

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 1***



**Respondent No:** 1

**Login:** Anonymous

**Email:** n/a

**Responded At:** Oct 04, 2018 08:45:40 am

**Last Seen:** Oct 04, 2018 08:45:40 am

**IP Address:** n/a

Q1. Name	Harry Ainslie
Q2. Postal Address	
Q3. What is your interest in this project?	resident
Q4. Please specify	not answered
Q5. Please select your age category	65 plus
Q6. Provide your written submission on the draft DPA in the space below.	
i live near the proposol	
Q7. Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 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	Agree
Q11. How could the consultation be improved?	
by involving more people	



**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 2***



**Respondent No:** 2

**Login:** Anonymous

**Email:** n/a

**Responded At:** Oct 16, 2018 17:50:53 pm

**Last Seen:** Oct 16, 2018 17:50:53 pm

**IP Address:** n/a

Q1. Name Mary Tsarnas

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify not answered

Q5. Please select your age category 55-64

Q6. Provide your written submission on the draft DPA in the space below.

I welcome the development plans as it will bring more completion and selection for us residents in that zone. It's a good thing when you have different shops to choose from.

Q7. Or upload your written submission not answered

Q8. Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 at 6pm? Yes

Q9. I found the information easy to understand Strongly agree

Q10. I had adequate notice to get involved with the consultation Strongly agree

Q11. I was satisfied that I was provided with adequate opportunities to have my say Agree

Q12. How could the consultation be improved?

not answered

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 3***



**Respondent No:** 3

**Login:** Anonymous

**Email:** n/a

**Responded At:** Oct 16, 2018 17:53:12 pm

**Last Seen:** Oct 16, 2018 17:53:12 pm

**IP Address:** n/a

Q1. Name Diamandi Tsarnas

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify not answered

Q5. Please select your age category 65 plus

Q6. Provide your written submission on the draft DPA in the space below.

Extra supermarkets and bulky goods retail in the area is great for the consumer. More choice is better outcomes for us

Q7. Or upload your written submission not answered

Q8. Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 at 6pm?

Yes

Q9. I found the information easy to understand

Strongly agree

Q10. I had adequate notice to get involved with the consultation

Agree

Q11. I was satisfied that I was provided with adequate opportunities to have my say

Agree

Q12. How could the consultation be improved?

not answered

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 4***



**Respondent No:** 4

**Login:** Anonymous

**Email:** n/a

**Responded At:** Oct 16, 2018 17:55:02 pm

**Last Seen:** Oct 16, 2018 17:55:02 pm

**IP Address:** n/a

Q1. Name Toula Tsarnas

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify not answered

Q5. Please select your age category 40-54

Q6. Provide your written submission on the draft DPA in the space below.

I like the plans and hope they go ahead. Choice between supermarkets makes for better deals for us

Q7. Or upload your written submission not answered

Q8. Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 at 6pm? Yes

Q9. I found the information easy to understand not answered

Q10. I had adequate notice to get involved with the consultation not answered

Q11. I was satisfied that I was provided with adequate opportunities to have my say not answered

Q12. How could the consultation be improved?

not answered

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 5***



**Respondent No:** 5

**Login:** Anonymous

**Email:** n/a

**Responded At:** Oct 16, 2018 18:04:43 pm

**Last Seen:** Oct 16, 2018 18:04:43 pm

**IP Address:** n/a

Q1. Name John Panteladis

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify not answered

Q5. Please select your age category 65 plus

Q6. Provide your written submission on the draft DPA in the space below.

I would like the proposal to go ahead. An Aldi store will bring healthy competition and more choice for the consumer

Q7. Or upload your written submission not answered

Q8. Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 at 6pm? No

Q9. I found the information easy to understand not answered

Q10. I had adequate notice to get involved with the consultation not answered

Q11. I was satisfied that I was provided with adequate opportunities to have my say not answered

Q12. How could the consultation be improved?

not answered



**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 6***



**Respondent No:** 6

**Login:** Anonymous

**Email:** n/a

**Responded At:** Oct 16, 2018 18:36:37 pm

**Last Seen:** Oct 16, 2018 18:36:37 pm

**IP Address:** n/a

Q1. Name Erene Petrovic

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify not answered

Q5. Please select your age category 25-39

Q6. Provide your written submission on the draft DPA in the space below.

I will welcome this development, I think it will be great for the area

Q7. Or upload your written submission not answered

Q8. Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 at 6pm? Yes

Q9. I found the information easy to understand not answered

Q10. I had adequate notice to get involved with the consultation not answered

Q11. I was satisfied that I was provided with adequate opportunities to have my say not answered

Q12. How could the consultation be improved?

not answered

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 7***



**Respondent No:** 7

**Login:** Anonymous

**Email:** n/a

**Responded At:** Oct 16, 2018 18:38:26 pm

**Last Seen:** Oct 16, 2018 18:38:26 pm

**IP Address:** n/a

Q1. Name Kosta Petrović

Q2. Postal Address



Q3. What is your interest in this project? resident

Q4. Please specify not answered

Q5. Please select your age category 25-39

Q6. Provide your written submission on the draft DPA in the space below.

I would love to see this development go ahead. I think it's great for the consumer to have choice and for the supermarkets to have competition

Q7. Or upload your written submission not answered

Q8. Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 at 6pm? Yes

Q9. I found the information easy to understand not answered

Q10. I had adequate notice to get involved with the consultation not answered

Q11. I was satisfied that I was provided with adequate opportunities to have my say not answered

Q12. How could the consultation be improved?

not answered

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 8***

29 October 2018



CITY OF  
**Port Adelaide Enfield**

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

Attention: Jim Gronthos, Senior Policy Planner

Dear Sir,

**Re: Grange Road, Findon Development Plan Amendment (Privately Funded) - submission**

I refer to the abovenamed DPA that has been released for consultation.

In reviewing the document, the affected site's distance from the City of Port Adelaide Enfield is noted, along with the projected trading catchment of the intended retail development.

On this occasion, Council has no specific comments on the proposed policies, and no objection to the DPA as a whole. Council does not wish to speak at the public meeting.

Thank you for the opportunity to comment. If you require further information or would like to discuss this matter, please contact Michael Kobas, Urban Planner on telephone 08 8405 6002.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Karen Cummings'.

Karen Cummings  
**City Development Manager**

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 9***

**From:** Metropolitan Fresh Findon <findon@metrofresh.com.au>  
**Sent:** Wednesday, 7 November 2018 4:05 PM  
**To:** Jim Gronthos  
**Subject:** Draft Grange Road, Findon Development Plan - Submission

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

Dear Sir

RE: **Draft Grange Road, Findon DPA – Submission**

In reference to your correspondence dated 4<sup>th</sup> October 2018 in regards to the Draft Grange Road Development Plan Amendment (Privately Funded) – Public Consultation.

Please be advised that we will **strongly objecting** to an “ALDI Store” on the corner of Grange & Findon Road.

There will be significant impact to the retail traders within the Findon Shopping Centre. Implementation of this facility would see a massive decline in turnover and profits to many retailers.

In respect to my business I believe the impact would mean the minimum termination of 10 employees.

The ALDI group working model is to have minimal service staff therefore from an employment perspective collectively you would potentially have significant job losses within the Western Suburbs.

The Western suburbs is very well serviced with shopping centres at West Lakes, Fulham Gardens, Westside, Arndale, BrickWorks and the Findon Shopping Centre. Aldi is already present at the Airport, West Lakes and Arndale and we believe setting one up in Findon is just saturating the area immensely.

We also need to consider that with the local independent stores in the area, the money and profit remains in South Australia as opposed to the Aldi stores where the money goes elsewhere.

Logistically we also need to consider the impact on traffic and the safety of residence and customers if a an Aldi store is erected. The restricted parking at both locations and potentially Customers trying to walk with trollies between the two centres would cause catastrophic chaos along Findon and Grange Roads.

The impact to small business owners within this radius will be significant and therefore we **Strongly Object** to an Aldi being erected on the corner of Grange and Findon Roads

Please don't hesitate to contact me if you wish to discuss further.

Regards

Michael Manov  
Managing Director  
Metropolitan Fresh Findon Pty Ltd  
Ph: 08 8356 7763  
Fax: 08 8353 0333  
[REDACTED]





**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 10***

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

Dear Sir

RE: **Draft Grange Road, Findon DPA – Submission**

In reference to your correspondence dated 4<sup>th</sup> October 2018 in regards to the Draft Grange Road Development Plan Amendment (Privately Funded) – Public Consultation.

Please be advised that we will **strongly objecting** to an “ALDI Store” on the corner of Grange & Findon Road.

There will be significant impact to the retail traders within the Findon Shopping Centre. As a Trader at Findon shopping centre we already struggling to compete against both Coles and Foodland. To offer another supermarket nearby could mean the end of our business. Not to mention potential loss of employment for 16 employees.

The Western suburbs is very well serviced with shopping centres at West Lakes, Fulham Gardens, Westside, Arndale, Brick Works, St Clair, Welland, Churchill and the Findon Shopping Centre. Aldi is already present at the Airport, West Lakes, Arndale and Churchill and we believe setting one up in Findon unfortunately the population in the western suburbs has not increased substantially to cater for another supermarket.

Please consider the small businesses in the area which cannot compete against the likes of Aldi, Coles & Foodland, these are all family owned and operated businesses. We therefore **Strongly Object** to an Aldi being erected on the corner of Grange and Findon Roads

Please don't hesitate to contact me if you wish to discuss further.

Regards

Ian & Michelle Faneco

**Ian & Michelle Faneco • Franchisees**

**Bakers Delight Welland Plaza** • Shop 18, 522 Port Road,  
Welland, SA 5007 Australia • T: +61 8340 2977

**Bakers Delight St Clair**, Shop 5, Cheltenham Parade,  
St Clair, SA 5011 Australia, T: +61 8244 0422

**Bakers Delight Findon**, Shop 29, 303 Grange Road,  
Findon, SA 5023 Australia, T: +61 8235 0359

[www.bakersdelight.com.au](http://www.bakersdelight.com.au) · [wellandbd@adam.com.au](mailto:wellandbd@adam.com.au)



**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 11***



Friendly Society Medical Association Limited  
ABN 69 088 347 602

52 Gawler Place, Adelaide SA 5000

GPO Box 612 Adelaide SA 5001

T. (08) 8223 0300 F. (08) 8223 2947

[www.nationalpharmacies.com.au](http://www.nationalpharmacies.com.au)

15 November 2018

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

Dear Sir

RE: Draft Grange Road, Findon DPA – Submission

We refer to your correspondence dated 4 October 2018 regarding the Draft Grange Road Development Plan Amendment (Privately Funded) – Public Consultation.

National Pharmacies is a large South Australian based organisation that has been operating from Findon Shopping Centre for more than 30 years.

We provide a valuable service to the residents around Findon Shopping Centre. We are open 8am until 9pm Monday to Saturday and from 9am to 9pm on Sundays and Public Holidays.

As reported, the retail environment has become extremely difficult and it is well document that retail spending is stagnate.

Over the past 3 years, our sales figures from our Findon store have been in decline. The sales figures are listed in the table below:

Business	2015/16	2016/17	2017/18
Pharmacy	\$8,348,159	\$8,280,242	\$8,122,675
Optical	\$504,104	\$477,591	\$470,515
Total	\$8,852,263	\$8,757,833	\$8,592,190

The decline in sales from 2015/2016 to 2017/2018 is 2.9% or an annual reduction of 1.5% and this trend is continuing in 2018/2019.

Any change that will take away the existing retail spending from the Findon Shopping Centre will place our business at risk and will ultimately result in us reducing our trading hours and most likely having to reduce staffing numbers.

The Western suburbs are already well serviced with shopping centres at West Lakes, Fulham Gardens, Westside, Arndale, BrickWorks and the Findon Shopping Centre. Aldi is already present at the Airport, West Lakes and Arndale and we believe setting one up in Findon will not increase the retail spending in the area.

As a proud South Australian organisation, our profits benefit South Australian members and remains in South Australia.

Given the above, we strongly object to this development and ask that our concerns be considered when assessing this proposal.

If you have any queries regarding the above and the likely impact this development will have on our South Australian based business, please do not hesitate to contact me.

Yours sincerely



**IAN BRADROOK**  
**Senior Manager - Property Development**

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 12***



27 November 2018

Draft Grange Road, Findon DPA – Submission  
Attn: Chief Executive Officer  
City of Charles Sturt  
PO Box 1  
Woodville  
SA 5011

**By Email:** [council@charlessturt.sa.gov.au](mailto:council@charlessturt.sa.gov.au)

Dear Mr Sutton,

**Re: Draft Grange Road, Findon DPA**

I am writing in my capacity as General Manager of Drakes Supermarkets in response to the City of Charles Sturt's public consultation period for the proposed Development Plan Amendment for Grange Road, Findon ("DPA").

Drakes Supermarkets operates a Foodland supermarket at the Findon Shopping Centre which is located directly opposite the proposed DPA affected area at Grange Road, Findon and subsequently we wish to note our objection to the proposed amendment.

It is our submission that the existing Findon Shopping Centre adequately services the needs of the area and there is no compelling reason to change the Development Plan to allow the proposed new Aldi and related development. The City of Charles Sturt's Strategic Directions Report 2014 ("SDR") outlines a need to provide services and daily needs providers (eg food shopping retail) within close proximity to residential areas. This need is already provided for by Findon Shopping Centre in which large Foodland and Coles supermarkets are located, along with a number of smaller retailers which complement the larger stores. The centre is located a mere 150m away from the proposed new site which is completely unnecessary to support the needs of the local community which are already catered for by the existing retailers.

The analysis by JLL included in the Explanatory Statement and Analysis to the DPA suggests that existing retailers in the vicinity might expect a loss of turnover of approximately 5% which is considered 'acceptable' by the report's authors and that the proposed Aldi will not be in direct competition with the existing supermarkets located adjacent to the site. Drakes Supermarkets rejects these comments, and we believe the negative impact may potentially be much higher, as experienced by our other stores where Aldi sites have opened within the same catchment area. Even at 5% loss of turnover this presents an unacceptable loss to our business and we will be unable to guarantee that our business will continue to remain viable at the Findon location. The claims by JLL that Aldi would not be in direct competition due to the nature of the goods sold and that all losses would be recouped within two years is fanciful.

The SDR also outlines a need to consider the impact of major development sites on road networks and key intersections. As mentioned in the Traffic Impact Assessment conducted by Infraplan and included as an Appendix to the Explanatory Statement and Analysis, the intersection of Grange and Findon Roads is already near capacity and the proposed development is likely to increase traffic flows and queue times. This will have a negative effect on the neighborhood and may result in potential customers of Findon Shopping Centre choosing shop elsewhere to avoid traffic congestion.

Furthermore, as detailed in the Explanatory Statement and Analysis, there are a number of targets provided in the South Australia Strategic Plan 2011 which should be considered by the council in planning decisions. Contrary to the comments made in the Explanatory Statement, we submit that the following targets will not be supported if the DPA is approved;

- Target 35 regarding Economic Growth will not be supported should the council approve the DPA. The proposed development will be highly detrimental to competing businesses such as those located at Findon Shopping Centre and may result in the closure of these business instead of growth.
- Targets 47 and 49 regarding Employment are similarly not supported. The possible closure of businesses suffering financial strain resulting from the proposed Aldi store will have the consequence of less employment opportunities in the area.
- Target 38 relating to Business Investment may also be negatively affected as it may not be viable for existing business make any further investment in the area.

In confirming its objection to the proposed DPA, Drakes Supermarkets requests to be heard at the public meeting proposed to be held on 18 February 2019 regarding this matter.

Thank you

Regards

A handwritten signature in blue ink, appearing to read 'Bob Soang', with a horizontal line extending to the right.

Bob Soang  
General Manager  
**Drakes Supermarkets**



**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 13***

30 November 2018

REF No.: 00483-003

Mr Jim Gronthos  
Senior Policy Planner  
City of Charles Sturt  
PO Box 1  
WOODVILLE SA 5011  
By Email: [jgronthos@charlessturt.sa.gov.au](mailto:jgronthos@charlessturt.sa.gov.au)

Dear Jim,

## RE: FINDON DEVELOPMENT PLAN AMENDMENT – SUBMISSION ON BEHALF OF ALDI

We refer to the draft Grange Road, Findon Development Plan Amendment (DPA) which is currently undergoing public and agency consultation. As previously advised, Ekistics has been engaged by ALDI to review the DPA and prepare this submission.

### 1. Summary

Following our review of the DPA and associated documents, we support the extension of the Neighbourhood Centre Zone and Findon Policy Area 10 to cover the subject land. We also support the creation of a new Precinct to provide specific policy guidance for future development in this location. However, we wish to raise the following key concerns with the DPA:

- **Landscape Buffer** – we believe that the proposed 3 metre wide landscape buffer will significantly constrain development on the site, will not minimise the transfer of noise and odour and has the potential to cause issues from a crime prevention perspective;
- **Height of freestanding signs** – currently, freestanding signs in the Findon Policy Area 10 are non-complying if they exceed 6 metres in height. This restriction doesn't reflect the height of existing signs and is inconsistent with the height of signs typically relating to retail development. Therefore, it is recommended that the non-complying trigger be lifted to signs that are greater than 8 metres in height;
- **Traffic movements** – we believe that additional clarity should be provided within the DPA in relation to access arrangements, the movement of service vehicles and the provision of shared car parking spaces.

These matters are addressed in greater detail on the following pages of this letter along with recommended changes to the proposed planning controls within the DPA.

## 2. Background

### 2.1 History

For some time now, ALDI has been seeking to establish a Store in the Findon area. Individually, ALDI Stores represent a direct investment of more than \$5M and result in the employment of approximately 25 full time equivalent (FTE) positions. An additional 48 FTE direct and indirect jobs will be created during the construction period.

Ideally, ALDI is seeking to construct a Store along Grange Road given its strategic location in the inner western suburbs, adjacent an arterial road corridor and close to residential development. Accordingly, ALDI has secured a site of approximately 8,344m<sup>2</sup> in area at 263A -275 Grange Road, Findon which is used (or has been used) for various retail and commercial businesses including 'Tradelink', 'Grange Road Motors' and 'Adelaide Canoe Works' (see Figure 1 on the following page).

In addition to the ALDI Store, initial development concepts for the land have proposed a mixed-use outcome directly to the west of the ALDI Store – potentially retail on ground floor and residential above.

Prior to settling on 263A-275 Grange Road, Findon as the preferred location, ALDI undertook extensive investigations into a range of potential sites within the inner western suburbs of Adelaide. Initially, these investigations focussed on Centre Zones which, generally, offer a supportive policy framework for an ALDI Store. However, it soon became apparent that these Zones were either quite limited in size and/or depth or the land within them was tightly held by existing businesses. Accordingly, ALDI concluded that no suitable sites were available within the existing Centre Zones given ALDI's requirements for a minimum total site area of around 5,000m<sup>2</sup>, adequate car-parking and safe and efficient loading arrangements for ALDI's trucks.

In particular, the Findon Centre shopping complex was considered as a potential site for an ALDI Store. However, there are currently no vacant shops within the Findon Centre and the complex already contains a Coles and Foodland supermarket.

Figure 1 Subject Site

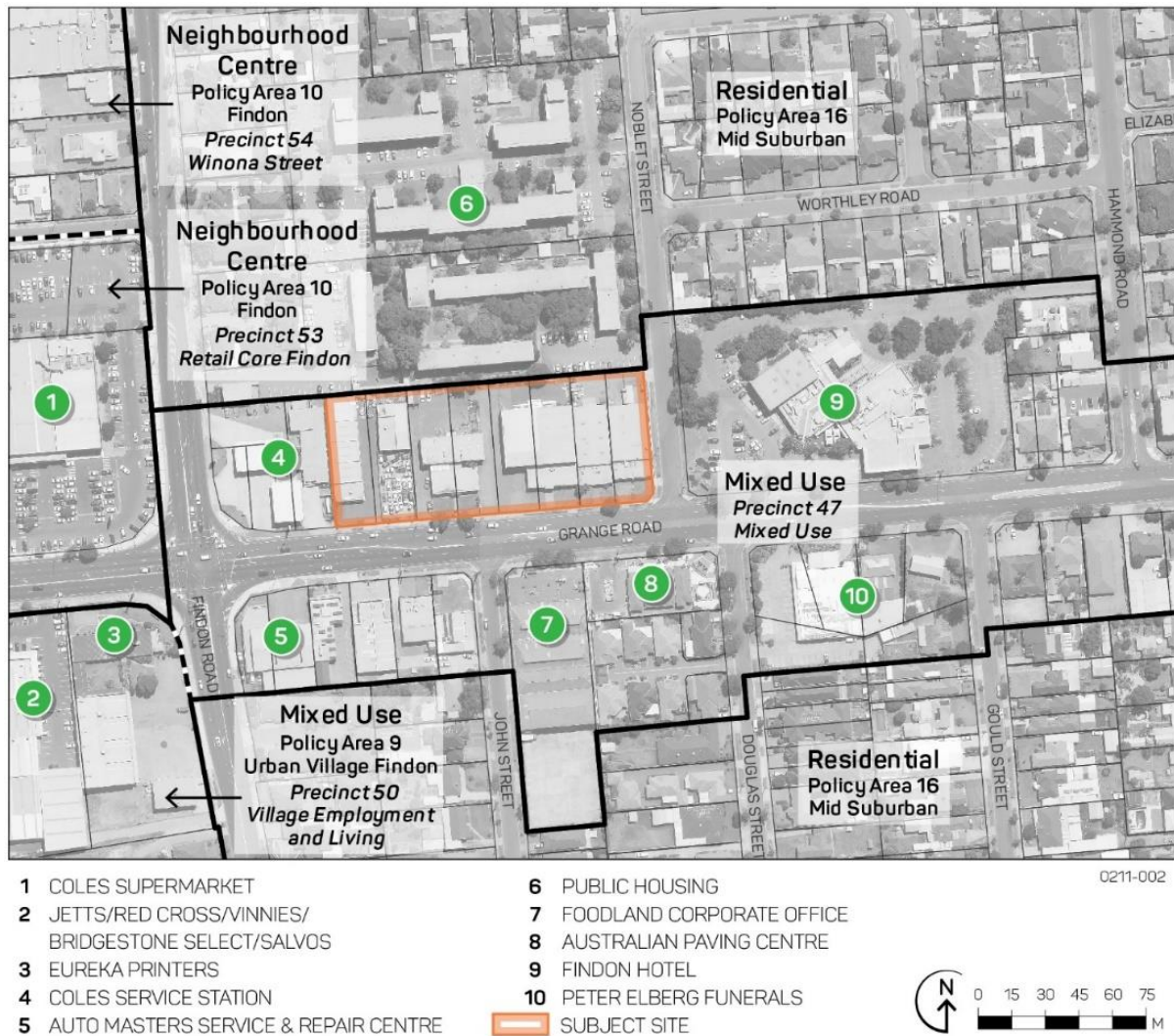


ALDI has also considered a number of sites outside the existing Centre Zones. However, these sites are constrained by zoning restrictions which, in most cases, would result in an ALDI Store being a non-complying form of development. For example, the Mixed Use Zone, which covers a significant portion of Grange Road, lists a 'shop or group of shops' with a gross leasable floor area of 250m<sup>2</sup> or more as non-complying. Consequently, ALDI has entered into a formal agreement with the City of Charles Sturt to fund a DPA to provide a more supportive policy framework for the subject land at Findon.

Importantly, the locality is also predominantly commercial in character and nature (see **Figure 2**). More specifically, the Findon Hotel is located to the east of the site over Noble Street and a service station is situated to the west with frontage to Findon Road and Grange Road. A range of commercial land uses (i.e. showrooms, vehicle repair, offices) exist on the opposite side of Grange Road. The Findon Shopping Centre, containing supermarkets and speciality shops, is situated to the north-west of the Grange Road and Findon Road intersection.

In addition to the commercial land uses, high density public housing, in the form of residential flat buildings up to four storeys in height, is located to the north of the subject land and extends across the entire rear site boundary.

Figure 2 Locality and Existing Zoning



## 2.2 Proposed Development

The ALDI Store is proposed to be located on the corner of Grange Road and Noblet Street, Findon.

Approximately two-thirds of the site will be required for the ALDI Store (based on indicative concept plans). The balance of the site will be available for a complementary land use which is yet to be determined, but is likely to be some form of retail such as a shop or bulky goods outlet.

The ALDI Store is likely to have a nett floor area in the order of 1,700m<sup>2</sup>, of which approximately 1,180m<sup>2</sup> will be retail floor space and the remaining areas used for 'back of house' functions and staff amenities.

In terms of car parking, various concepts have proposed in the order of 120 to 130 spaces for the ALDI Store and the associated development with the exact details to be resolved via a future Development Application. A shared parking area will be created with primary vehicular access provided off Grange Road and secondary access off Noblet Street. Preliminary advice has been provided by GTA traffic consultants to confirm that

appropriate distances and sightlines are maintained between the proposed access points and existing intersections within the locality.

We note that the Council's traffic consultant (InfraPlan) has supported the proposed access arrangements and provision of car parking spaces.

ALDI Stores are typically much smaller than full-scale Coles and Woolworths supermarkets (less than half the size). Also, all deliveries to the Store are undertaken by ALDI employees, with only two 19 metre truck deliveries per 24 hours and one daily bakery delivery via a small rigid vehicle. This means that the impact of an ALDI Store on nearby residential areas will be significantly less than a full-scale Coles or Woolworths supermarket.

Importantly, the retail analysis prepared by Council's consultant (Jones Lang LaSalle) indicates that the proposed ALDI will only have a minor impact on the turnover of the adjacent Findon Shopping Centre and that this impact will be recouped within two years. Also, the introduction of an ALDI Store will provide increased choice and competition for customers which will assist to drive down weekly grocery bills for residents in the area.

### 3. The DPA

#### 3.1 Introduction

We note and support the proposed rezoning of the subject land to Neighbourhood Centre. The existing and proposed land uses within the area affected by the DPA are listed as envisaged forms of development in the Neighbourhood Centre Zone and it makes sense to expand the existing Zone to the east along Grange Road to encompass the subject land. In this way, a consistent policy approach can be established for development in this location. Similarly, we support the extension of the Findon Policy Area 10 to cover the affected area and we support the introduction of a new Findon Centre East Precinct to provide more specific policy guidance for future development.

Notwithstanding our support for the introduction of the Neighbourhood Centre Zone over the land, we have identified a number of concerns with the proposed new policies – some of which have the potential to place significant constraints on future development, particularly the proposed ALDI Store. These concerns are set out below together with suggested recommended changes.

#### 3.2 Neighbourhood Centre Zone

As noted above, we support the introduction of the Neighbourhood Centre Zone over the subject land. However, we recommend that a number of minor amendments be made to reflect the proposed land uses and associated development. Firstly, we recommend that Principle of Development Control (PDC) 1 of the Zone be amended to include 'bulky goods outlet' as an envisaged form of development. Accordingly, PDC 1 would read as shown on the following page.



**1** *The following forms of development are envisaged in the zone:*

- bank
- bulky goods outlet
- child care facility
- consulting room
- dwelling in conjunction with non-residential land uses
- library
- health centre
- office
- petrol filling station
- place of worship
- playing field
- pre-school
- primary school
- recreation area
- restaurant
- shop
- supermarket.

Secondly, we recommend that the Non-complying Development list within the Procedural Matters section of the Zone be amended so that a freestanding advertisement greater than 6 metres in height is no longer captured as a non-complying form of development. This reflects the existence of a number of freestanding signs in the locality that are taller than 6 metres (see Figure 3) while also reflecting the fact that freestanding signs associated with an ALDI Store (or similar forms of development) are typically in the order of 8m in height.

With the above in mind, it is recommended that the Non-complying Development list be amended as follows so that an 8 metre high freestanding sign would be assessed on its merits in the Findon Policy Area 10:

*Advertisement and/or advertising hoarding that:*

- (a) is roof mounted and projects above the roof line*
- (b) is parapet mounted and protrudes above the top of the parapet*
- (c) is animated or flashing*
- (d) is freestanding and greater than 8 metres in height within **Findon Policy Area 10** and 6 metres in height within **Findon Road Policy Area 11***
- (e) is freestanding and greater than 4 metres in height within **Henley Square Policy Area 12***
- (f) is freestanding signs or sign trees on Tapleys Hill Road, south of Poplar Street within **Royal Park Policy Area 13**.*

Figure 3 Existing freestanding sign in the locality exceeding 6m in height



### 3.3 Findon Policy Area 10

We note that the DPA proposes to amend the Desired Character Statement in the Findon Policy Area 10 to guide future development within a new 'Precinct 84 Findon Centre East'. While we're generally supportive of the intent of the addition to the Desired Character Statement, we have significant concerns with the strong emphasis on the provision of an *"... intensely planted landscaped buffer along the interface of the precinct with the Residential Zone"*. The provision of a landscaped buffer is also reinforced by proposed PDC 10 in the Precinct which requires a 'screen' of at least 3 metres in width containing a *"... densely planted row of trees which will achieve a mature height of a least 6 metres"*. Concept Plan Map ChSt/7 also reinforces the provision of an "Intensive Landscape Buffer" along this boundary.

Given the rectangular shape of the site (which results in a wide frontage and a relatively narrow depth), the provision of a 3 metre wide landscaped buffer places a very significant constraint on the land and is likely to render the site undevelopable for an ALDI Store for the following reasons:

- The landscape buffer would require the relocation of the existing (and proposed) access point to Noblet Street. This could have unintended consequences for traffic movements in the locality;
- A 3 metre wide landscape buffer would mean that the building would have to be sited closer to Grange Road which will severely impact the turning movements for the semi-trailers using ALDI's loading dock (e.g. semi-trailers may not have enough room to manoeuvre and reverse into the loading dock); and
- Siting the building at least 3m further to the south to accommodate the landscape buffer will result in a significant loss in car parking spaces (potentially meaning that ALDI may not be able to meet Council's car parking requirements).



In addition, the landscape screen will not assist to minimise any potential noise or odour generated by the proposed ALDI Store (as sought by proposed PDC 10 in the new Precinct). Specifically, we have been advised by Acoustic Engineers that landscaping is completely ineffective when it comes to reducing the transfer of noise. Rather a solid barrier, such as a fence or wall, is required to provide appropriate acoustic treatment. Similarly, in the unlikely event that the ALDI Store will generate any odours, a 3 metre wide strip of landscaping will not prevent these odours from travelling beyond the site.

While we anticipate that the authors of the DPA may have also intended that the landscape buffer may assist to screen views of the site from the residential flat buildings to the north, we respectfully suggest that this intention is misguided for the following reasons:

- The first apartment building within the SA Housing Trust complex is set well back from the boundary and does not contain any windows on its southern elevation (see Figure 4). Therefore, no views of the subject land are available from this building;
- While the second apartment building is sited closer to the common boundary we note that;
  - » the main living areas of the apartments and associated balconies face towards the north to overlook an internal landscaped courtyard (see Figure 5);
  - » the windows on the southern elevation appear to be either bedrooms or bathrooms from which views to the south towards the subject land are less likely to be obtained due to the use of the rooms (see Figure 6);
  - » an existing strip of mature trees is already located along the boundary near the second apartment building which already screens views (see Figure 7);
  - » the provision of a landscape buffer on the subject land will do little to restrict views from the second and third storeys of the apartment building towards the subject land.

**Figure 4** Apartment building to the north of the subject land (note lack of windows facing south)



**Figure 5** Internal landscaped courtyard onto which the apartment buildings face





**Figure 6** Second apartment building to the north of the subject land (note windows are for bedrooms)



**Figure 7** Second apartment building to the north of the subject land (note existing landscape screening)



In addition to the above, the provision of a 3 metre wide landscaped buffer between the wall of the ALDI Store and the boundary fence is likely to pose a risk from a crime prevention perspective. More specifically, the existing 'Crime Prevention' policies within the Development Plan warn against the creation of concealment opportunities and entrapment spots.

Notwithstanding the above, we can advise that the ALDI Store will provide substantially more landscaping over the site than is currently provided. This is consistent with ALDI's design philosophy which places a strong emphasis on the provision of landscaping to complement the building and 'frame' the car parks and access points. Specifically, ALDI will introduce landscaping along the Grange Road and Noblet Street frontages as well as along the northern boundary (in the form of shrubs and groundcovers) and within the car park. Details of the landscaping will be provided by ALDI's Landscape Architect as part of a forthcoming development application.

As mentioned previously, we note that the landscape buffer is partly intended to address potential noise issues arising from further development. Based on our experience with many other ALDI Stores that have been developed around metropolitan Adelaide in close proximity to residential development, the provision of an acoustic wall or fence is a much more effective way to address the transfer of noise. Therefore, we recommend that the DPA be amended to require the provision of appropriate treatments along the residential interface to minimise the transfer of noise and other impacts.

Given our concerns with the DPA's emphasis on the 3 metre wide landscape buffer, we recommend that the following changes be made to the Desired Character for Precinct 84 Findon Centre East. We have also suggested a number of minor changes which, we think, will assist to clarify the intent of the Zone and Policy Area. New text has been underlined and deletions have been struck through:

*This precinct will accommodate a supermarket, along with limited specialty retail and bulky goods facilities. Residential development is encouraged above non-residential uses.*

*~~It is important that~~ Development will be sited is located and designed to provide active facades and avoids the presentation of blank walls to the Grange Road and Findon Road frontages while also balancing the need to provide appropriate loading facilities and parking areas to support envisaged forms of development. ~~to integrate the precinct with the retail core to the west.~~*

*Pedestrian ~~environments~~ movement will be improved through the consolidation of vehicular access points and ~~facilitate the improvement of~~ connections with the retail core through safe crossing points to Findon Road. ~~with amenity improved through tree planting and landscaping.~~ Similarly, existing non-conforming vehicle access arrangements will be rectified through relocation and improvements to road infrastructure.*

*The amenity of the precinct will be improved through the provision of landscaping comprising trees, shrubs and groundcovers along the road frontages and within the car parking areas.*

*~~It is important that~~ Development will be is located and designed to minimise impacts on the amenity of residential properties abutting the precinct, particularly with regard to building bulk and scale, as well as noise and odour from servicing arrangements and plant equipment. ~~This will be assisted with the development of an intensely planted landscaped buffer along the interface of the precinct with the Residential Zone.~~ This will be achieved through the provision of appropriate treatments along the residential interface which may include acoustic walls, landscaping or other similar measures.*

We also recommend that PDC 10 of the Precinct be rewritten as follows to remove the emphasis on the 3 metre wide landscape buffer while also addressing the key planning issue which relates to the interface between the two land uses:

**10** ~~*A landscape screen of at least 3 metres in width should be planted along the boundary with the Residential Zone and should comprise a densely planted row of trees which will achieve a mature height of at least 6 metres. Development should include appropriate treatment measures along the boundary of the Residential Zone to minimise potential impacts associated with noise and odour.*~~

Finally, we recommend that 'Concept Plan Map ChSt/7 Findon Policy Area 10' be amended to reinforce the required interface treatment along the northern boundary. We have taken the liberty of amending the Concept Plan and have provided this as Appendix 1.

### 3.4 Traffic

Given the importance of traffic movements and access arrangements for the DPA and future development on the land, ALDI has engaged GTA Traffic Consultants to undertake a peer review of the InfraPlan Traffic Impact Report. GTA's review, which is contained in full in Appendix 2, concludes the following:

- Pedestrian linkages between the proposed site and the Findon Shopping Centre should be promoted via the existing traffic signals at Grange Road and Findon Road to suit the existing linkages within the Findon Shopping Centre;
- The car parking rates proposed will be appropriate for the proposed zone;
- The traffic generation of the proposal will be less than calculated in the Infraplan report and hence this report provides a conservative estimate of the traffic impact on the adjacent road network;
- The traffic impact of the proposal on the existing Grange Road and Findon Road intersection will be minor and within acceptable ranges for the intersection with no upgrade to the intersection considered necessary;
- The traffic impact of the proposal on Noblet Street will be within the capacity and amenity level for the street;
- The proposal will not meet the necessary volume of traffic for the required time based on Austroads Guidelines in order to consider traffic signals necessary for the Noblet Street and Grange Road intersection; and
- Access should be provided in two locations along the Grange Road frontage for safe and convenient access along the length of the frontage of the site, along with an access point to Noblet Street.

Based on GTA's review, it is clear that future development facilitated by the DPA will not trigger a need to upgrade the existing road infrastructure. Further, the DPA will facilitate a reduction in the number of crossovers to Grange Road which will improve the safety and efficiency of traffic movements in this locality.



Notwithstanding the above, we recommend that a number of minor amendments be made to the DPA to improve clarity in relation to traffic and access issues. For example, we recommend that PDC 5 in the Findon Policy Area be amended as follows to ensure that future access points to Findon and Grange Road are consistent with the relevant Concept Plan:

- 5 ~~No further vehicular access points should be created to Grange Road or Findon Road~~ should be provided in accordance with Concept Plan Map ChSt/7 - Findon Policy Area 10.

To this end, we also recommend that the Concept Plan be updated slightly to reflect the most recent investigations undertaken by ALDI in relation to access to the site. These amendments are included in Appendix 1 and, in essence, move the proposed access points further away from the John Street intersection.

In addition, the following new PDC is recommended for Precinct 84 Findon Centre East which specifically relates to the movement of service vehicles and the establishment of a shared use car park:

- 12 Buildings should be sited to enable the safe and efficient movement of service vehicles while also facilitating the establishment of shared car parking areas within the precinct.

## 4. Conclusion

In conclusion, we support the inclusion of the affected area in the Neighbourhood Centre Zone and Findon Policy Area 10. We also support the creation of a new Precinct to provide specific policy guidance for future development in this location. However, we are extremely concerned that the proposed 3 metre wide buffer along the northern boundary will significantly constrain development on the site will not address potential interface issues such as noise and odour. Rather, we recommend that the DPA be amended to require appropriate interface treatments along this boundary. This could include acoustic walls, landscaping or other similar measures which would need to be designed to the specifications of an appropriately qualified Acoustic Engineer.

We have also recommended a number of relatively minor amendments to the DPA to improve clarity, to address the movement of service vehicles and to ensure that freestanding signs of an appropriate height can be incorporated into the proposed development within triggering a non-complying assessment process.

We look forward to elaborating on our submission at the forthcoming Public Meeting. In the meantime, if any further information is required, please contact the undersigned on 7231 0286.

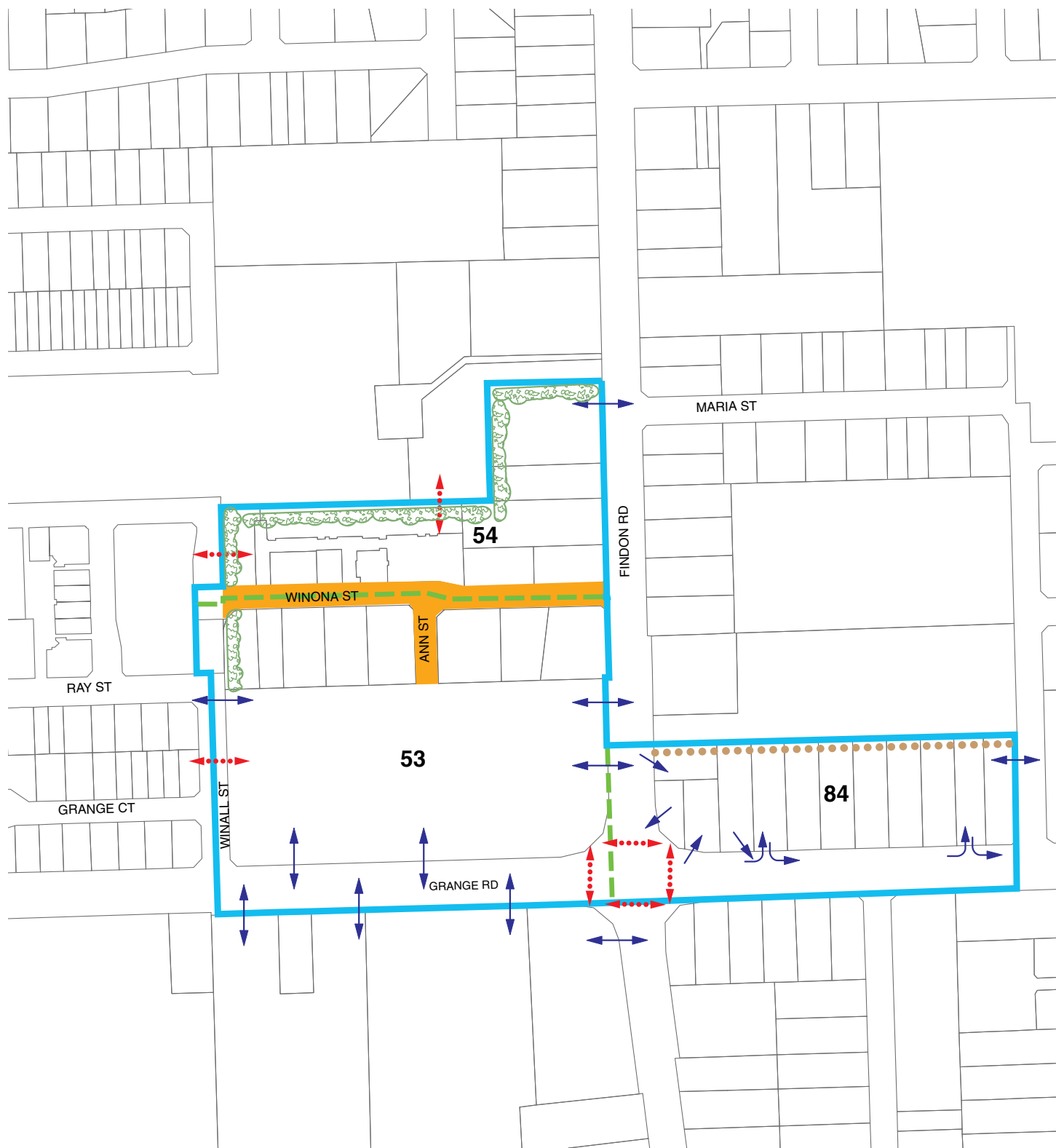
Yours Sincerely



**Kieron Barnes**  
Senior Associate

Cc Nigel Uren, Property Director, ALDI Stores

## Appendix 1. Amended Concept Plan



**53** Precinct 53 Retail Core Findon

**54** Precinct 54 Winona Street

**84** Precinct 84 Findon Centre East



Intensive Landscape Buffer



Vehicle Access Points



Pedestrian Links



Possible Future Traffic Restriction Measures



Interface Treatment



Policy Area Boundary



Precinct Boundary



0 25 50 75 100 125 metres



FINDON

# Concept Plan Map ChSt/7

## FINDON POLICY AREA 10



## Appendix 2. GTA Peer Review

REF: S111911

DATE: 30 November 2018

Ekistics  
PO BOX 32  
GOODWOOD SA 5034

Attention: Mr. Kieron Barnes (Senior Associate)

Dear Kieron,

**RE: GRANGE ROAD, FINDON DPA – TRAFFIC IMPACT REPORT – PEER REVIEW**

A Traffic Impact Report dated August 2018 was prepared by Infraplan for the Grange Road Findon Development Plan Amendment. GTA Consultants has been engaged by Ekistics to undertake a peer review of the report, in particular with regards to the findings and recommendations for the site. This letter provides the details of the review of the Infraplan report. Relevant extracts from the Infraplan report are provided in italics followed by our comments.

**Pedestrian Access**

*The proposed development will increase pedestrian movements around the site and create new desire lines. For this reason, additional pedestrian refuges or other crossing options for Grange Road and Findon Road should be explored to improve pedestrian safety.*

The recommended access routes in the Infraplan report includes a pedestrian refuge on Findon Road to the north of Grange Road, and a pedestrian refuge on Grange Road to the west of Noblet Street.

The proposed refuge location on Grange Road recommended in the Infraplan report does not align with any pedestrian routes within the Findon Shopping Centre. The Grange Road and Findon Road intersection includes signalised pedestrian crossing facilities which would enable pedestrians to safely cross Findon Road to walk east/west on Grange Road to the site.

The option for a pedestrian refuge on Grange Road will need to be considered in the context of access arrangements at the site and will require the support of DPTI. For these reasons, it is suggested that it would be premature to include this potential refuge on the concept plan.

**Car Parking**

*The proposed number of car parks is appropriate based on accepted traffic engineering practice and meets the Scenario 1 proposal to extend the Neighbourhood Centre Zone.*

*The proposed number of car parks does not strictly meet the existing Mixed-Use zoning or the Scenario 2 proposal to change the existing Mixed-Use Zone to allow for a greater GFLA.*

Both conclusions for parking are noted and will meet the parking requirements for the proposed land uses.

**Traffic Generation and Distribution**

**Grange Road and Findon Road Intersection**

The Infraplan report includes the following conclusion with regards to the Grange Road and Findon Road intersection:

*The signalised intersection of Grange Road and Findon Road is modelled as approaching saturation. The proposal will increase the number of trips through this intersection and will increase delay at the intersection and cause oversaturation. However, the modelled performance was not observed to accurately reflect real world conditions and therefore the proposal is not likely to significantly affect delay at the intersection. This would need to be reinvestigated should the site be further detailed.*

The Grange Road and Findon Road intersection is shown to be near capacity (in terms of DPTI modelling specifications) in the Infraplan report and the SIDRA results are what would be expected for an arterial road intersection of this nature. The assessment does note that the intersection operates better in reality than indicated by the SIDRA models. It is noted that this intersection was upgraded by DPTI in 2014 with modifications to through and turn lanes to reduce the number of right turn and rear-end crashes at the intersection and improve traffic flow.

Notwithstanding the above, the SIDRA modelling indicates the proposed development will only cause a decrease in capacity of less than 10% and minor increases in queue length. Given the analysis has been undertaken as a comparative capacity assessment, the differences between the existing and predicted operation is minor and would not require consideration of upgrades to the intersection.

With regards to traffic generation, the traffic assessment states *"this results in a total of 3,266 trips throughout the day and 351 in the peak hour. Subtracting the 538 daily and 78 PM peak hour trip of the existing site equates to 2,728 additional daily trips, and 273 additional PM peak hour trips.*

The predicted traffic generation for the proposed land uses in the traffic assessment are appropriate and reflect the likely traffic generation of the site. However, the traffic assessment does not consider the impact of linked trips (or passing trade) which has been identified as high as 35% for ALDI Stores (based on surveys in Victoria by GTA Consultants). It is noted however that DPTI will typically only accept 20% as a passing trade factor.

Hence the actual traffic impact on Grange Road would likely be 20% less (as a minimum) than calculated in the traffic assessment. Whilst this does not have an impact on the assessment of turning movements into and out of the site, it would have an impact on the Grange Road and Findon Road intersection analysis and reduce the impact of the proposal on the intersection further.

A 20% reduction in predicted traffic volumes on Grange Road would be a reduction of approximately 35 trips per peak hour and 355 trips per day from the predicted total traffic volumes.

It should also be noted that the traffic generation of an ALDI Store peaks on a Saturday generally, with weekday peak traffic generation rates lower than that assumed in the Infraplan report. Hence, the traffic generation calculated in the Infraplan report should be considered a conservative estimate (that is higher than would be expected in reality).

Based on the above review of the traffic models developed in the Infraplan report and the consideration of linked trips on actual traffic generation, I consider that the proposal is not likely to significantly affect delay at the Grange Road and Findon Road intersection.

Hence, I consider that an upgrade of the Grange Road and Findon Road intersection is not required as a consequence of the DPA.

### Noblet Street Intersection

Three scenarios were developed in the Infraplan report for access to the site which has an impact on the operation of Noblet Street as follows:

*This results in three potential scenarios for the site:*

- 1. John Street is modified as a left-in and left-out street only, reducing the risk of conflict with the existing accessway. This would need to include an assessment of traffic redistribution and a Road Safety Audit,*
- 2. The primary access on Grange Road is relocated outside of the prohibited zone (as per Figure 7), and incorporates right turns out as per Figure 10. This would need to be supported by a Road Safety Audit, or*
- 3. The primary access on Grange Road is relocated and designed as left in & left out only with a potential requirement for traffic signals at the intersection of Noblet Street and Grange Road (requiring further investigation and design in consultation with DPTI). It is noted that this arrangement is favoured by DPTI and Council although the installation of traffic signals is not.*

*Movements identified in Option 3 are recommended for inclusion in the concept plan for the district centre to minimise conflict and align with Council and DPTI policy. The remaining potential options may be further explored in detailing of the site should issues arise with Option 3.*

Peak hour traffic volumes recorded for the traffic assessment indicate 56 vehicle movements at the intersection during the PM peak hour, which suggests a daily volume of approximately 600 vehicles per day on Noblet Street. The increase predicted of the proposed land uses could increase traffic by up to 300 vehicles per day to the north of the site (residential section), and 800 vehicles per day at the Grange Road intersection (commercial section). These volumes would remain within the capacity of the street and below the general amenity level of 2,000 vehicles per day.

The assessment suggests that the Noblet Street intersection may possibly meet a warrant for traffic signals (under Option 3).

The warrant for traffic signals is defined Austroads Guide to Traffic Management Part 6: Intersection, Interchanges and Crossing (Austroads, 2007) which states the following:

*The following guidelines indicate those circumstances where signals could be of significant benefit. The terms 'major' and 'minor' are used respectively to indicate the roads carrying the larger and smaller traffic volume:*

**a. Traffic volume:** *Where the volume of traffic is the principal reason for providing a control device, traffic signals may be considered, subject to detailed analysis when the major road carries at least 600 vehicles/hour (two way) and the minor road concurrently carries at least 200 vehicles/hour (highest approach volume) on one approach over any 4 hours of an average day.*

**b. Continuous traffic:** *Where traffic on the major road is sufficient to cause undue delay or hazard for traffic on a minor road, traffic signals may be considered when the major road carries at least 900 vehicles/hour (two way) and the minor road concurrently carries at least 100 vehicles/hour (highest approach volume) on one approach, over any 4 hours of an average day. This warrant applies provided that the installation would not disrupt progressive traffic flow, and that no alternative and reasonably accessible signalised intersection is present on the major road.*

The key to identifying a warrant for traffic signals is understanding the flow of traffic on the minor road which must occur for any 4 hours of a day, for instance 100 vehicles per hour or 200 vehicles per hour.

Traffic surveys at ALDI Hawthorn on the corner of Belair Road and Angas Road in Hawthorn recorded on weekdays a maximum hourly volume of 172 trips per hour throughout a weekday which is much less than the calculated peak volume of over 235 vehicles per hour in the Infraplan report.

Based on these surveys, the proposed development would not generate sufficient traffic volumes to meet the warrant for traffic signals at the Noblet Street and Grange Road intersection when considering distribution between the separate driveways of the site.

## Access

*The proposal would reduce the number of vehicle crossovers significantly and reduce the likelihood of conflict between vehicles and pedestrians.*

*Left in and left out access only to primary accessways off of Grange Road is recommended for inclusion in the concept plan for the district centre.*

A reduction in the number of driveways of the existing site is supported. The size and frontage of the site would require two access points on Grange Road and an access point on Noblet Street. Given the location of adjacent intersections of side streets, the access points would need to be left in and out movements only. This will allow for efficient access by vehicles between the various uses of the site, and also facilitate appropriate access routes into and through the site for heavy vehicles associated with deliveries and waste collection.

There are various options for access arrangements and median arrangements discussed in the Infraplan report. These ultimately will require agreement with DPTI based on a detailed development application. A limitation on the number of access points should only be considered in the context of the traffic generation of the site and the land uses proposed.

The location of adjacent local street intersections and existing median arrangements will make the provision of a right turn directly out of the site difficult. The need for a right turn from the site is reduced by the availability of the Noblet Street intersection and access via a driveway on Noblet Street.

## Waste Collection

*While a large amount of waste is anticipated to be generated by the site, provision of an on-site compactor and appropriate servicing techniques (requiring further detail) is likely appropriate and consistent with Development Plan requirements.*

The proposed site will be capable of providing for appropriate servicing by waste collection service providers as required.

## Summary

A review of the Traffic Impact Report (Infraplan, August 2018) for the Development Plan Amendment has found the following:

1. Pedestrian linkages between the proposed site and the Findon Shopping Centre should be promoted via the existing traffic signals at Grange Road and Findon Road to suit the existing linkages within the Findon Shopping Centre;
2. The car parking rates proposed will be appropriate for the proposed zones;
3. The traffic generation of the proposal will be less than calculated in the Infraplan report and hence this report provides a conservative estimate of the traffic impact on the adjacent road network;
4. The traffic impact of the proposal on the existing Grange Road and Findon Road intersection will be minor and within acceptable ranges for the intersection with no upgrade to the intersection considered necessary;
5. The traffic impact of the proposal on Noblet Street will be within the capacity and amenity level for the street;
6. The proposal will not meet the necessary volume of traffic for the required time based on Austroads Guidelines in order to consider traffic signals necessary for the Noblet Street and Grange Road intersection;
7. Access should be provided in two locations along the Grange Road frontage for safe and convenient access along the length of the frontage of the site, along with an access point to Noblet Street;

For the above reasons, we remain of the view that the existing road infrastructure will comfortably accommodate the development envisaged by the DPA including a new ALDI Store

Naturally, should you have any questions or require any further information, please do not hesitate to contact me on (08) 8334 3600.

Yours sincerely

**GTA CONSULTANTS**



**Paul Morris**  
Director

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 14***

**Respondent No:** 13**Login:** Anonymous**Email:** n/a**Responded At:** Nov 30, 2018 14:24:48 pm**Last Seen:** Nov 30, 2018 14:24:48 pm**IP Address:** n/a

Q1. **Name** Joyce Baronian

Q2. **Postal Address**

[REDACTED]

Q3. **What is your interest in this project?** resident

Q4. **Please specify** not answered

Q5. **Please select your age category** not answered

Q6. **Provide your written submission on the draft DPA in the space below.**

Vegetation - the nature strip and areas surrounding the development need to be sufficiently vegetated with appropriate trees and other greenery. Too many of these developments are going ahead at the expense of loss of trees and vegetation. Traffic - traffic congestion needs to be managed so that surrounding streets are not clogged up with parked cars. There is already an approved development going ahead in John Street, Flinders Park across the road from this proposed development that will cause traffic and parking issues so if not managed properly the proposed development will just compound the problem. Trolleys - shopping trolleys should not be allowed to leave the shopping complex. Parking should not be allowed on Grange Road. All parking for the proposed businesses should be off street.

Q7. **Or upload your written submission** not answered

Q8. **Do you wish to be heard at the Council public meeting to be convened in relation to this draft DPA on Monday 18 February 2019 at 6pm?** No

Q9. **I found the information easy to understand** Agree

Q10. **I had adequate notice to get involved with the consultation** Agree

Q11. **I was satisfied that I was provided with adequate opportunities to have my say** Agree

Q12. **How could the consultation be improved?**

not answered

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 15***



Mr Paul Sutton  
CEO,  
City of Charles Sturt  
72 Woodville Road,  
Woodville, SA, 5011  
council@charlessturt.sa.gov.au  
(08) 8408 1100

Dear Sir,

Civic Built is the owner of land immediately adjacent to land at 263A-275 Grange Road, Findon, which is proposed to be rezoned. Further to the notice advertised on Council's website on 4 October 2018, please accept this submission in relation to the proposed Grange Road, Findon Development Plan Amendment (DPA).

In November 2017, Civic Built made comment through its consultants on the Statement of Intent (SOI) prepared on behalf of ALDI. One of the core concerns raised at that time was the appropriateness of the selected site for the proposed intended uses. These concerns remain unresolved by the DPA investigations and proposed policy amendments.

The intent of the DPA was to investigate planning policy amendments to determine the suitability of the Affected Area to facilitate potential retail development in the form of an ALDI store (eastern portion of the subject site). Council's information brochure about the DPA<sup>1</sup> submits that the draft DPA investigations confirm that the land is suited to higher order of retail activities based on a range of matters including retail analysis, transport assessment, stormwater management, environmental management and interface issues.

Two key concerns are raised with respect to the DPA, as follows:

1. The DPA investigations do not clearly resolve or demonstrate that critical matters such as traffic, can be resolved to justify the rezoning.
2. Planning policy amendments are considered and tested using the ALDI development as the substantive lens for assessment rather than a more accepted planning approach that considers highest and best use for the land.

Each of these concerns is discussed in further detail below.

#### *DPA Investigations*

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<sup>1</sup> <https://www.yoursaycharlessturt.com.au/39493/documents/88618>

We have commissioned expert peer reviews in relation to: the economic and retail impact of the proposal; and a transport impact assessment. These independent assessments identify a series of deficiencies with the DPA investigations which bring into question the appropriateness of the site for rezoning. Attention is drawn to key matters below. The full peer review reports are **enclosed** and are to be considered and referred to in conjunction with this correspondence.

#### Economic Impact Assessment Peer Review

The peer review of the Economic Impact Assessment (EIA) conducted by Jones Lang LaSalle (JLL) has been prepared by MacroPlan-Dimasi (MacroPlan) and identifies shortcomings in relation to the JLL report, as summarised below:

- Omission of planning context and exact use composition;
- The methodology utilised by JLL;
- The absence of a market gap assessment of the trade area;
- Lack of evidence supporting first year sales estimates and other predictions; and
- Omission of community benefit assessment.

Of particular concern is MacroPlan's finding that:

*The JLL report fails to provide a detailed assessment of supermarket/retail demand and market gap within the main trade area. MacroPlan considers that this analysis is required to demonstrate if the proposed ALDI supermarket is supportable at the subject site.*

Based on the review by MacroPlan, it is submitted that the existing investigations do not adequately demonstrate a need for rezoning of the affected area for a supermarket development.

#### Traffic and Access Peer Review

MFY (traffic, parking and transport experts) was engaged to undertake a review of the traffic and parking assessment by InfraPlan dated August 2018 and the traffic modelling appended to that report. MFY has raised concerns and matters that warrant further review, as summarised below:

- The analysis of the Grange Road/Findon Road intersection in accordance with appropriate modelling standards and to DPTI requirements, including identification of potential upgrades to achieve at least status quo operation standards at the intersection;
- Adequacy of identification of access arrangements;
- The absence of a masterplan identifying site capacity;
- Lack of clarity around parking rates; and
- Quality of assessment of traffic impacts on adjacent residential streets.

Based on the review by MFY, the DPA investigations do not adequately confirm that an appropriate access solution can be achieved for the site, or any associated traffic safety implications on Grange Road and adjacent residents.

Until an access solution can be demonstrated for the proposed land use, it is inappropriate for the land to be rezoned.

At a fundamental level, the DPA investigations should be in respect to the highest and best use of the site for a range of land uses that may be envisaged within the proposed zoning. The investigations informing the DPA are targeted at demonstrating a specific land use and development outcome for the site which are considered more appropriately tested through the development assessment process. The current investigations and policy approach, while intended to unlock the land for development, are considered to unnecessarily restrict future development of the site (particularly in the case that access arrangements limit the feasibility of the site for the intended ALDI development). Planning policy limitations associated with the proposed DPA are discussed in more detail below.

### *Policy Limitations*

The 'Review of Zone Options' contained in the DPA makes it clear that the primary criteria for assessing the merit of each Zone was its ability to accommodate an ALDI supermarket. It is suggested that the rezoning should adopt a broader lens for assessment which will ultimately result in a better planning policy outcome. This is of critical importance given further investigation appears necessary to establish whether further supermarket space is warranted or whether it would simply be an encroachment on the future provision of other land uses.

The 'Review of Zone Options' contained in the DPA also notes that the existing Mixed Use Zone provisions could be used to test the suitability of a retail outlet with gross leasable floor area greater than 250m<sup>2</sup> as a non-complying form of development. As the existing development assessment pathway can be utilized to test the proposed ALDI development, the rezoning process should not be seeking to replicate the development assessment process.

Other fundamental limitations exist within the proposed policies which should be addressed prior to the finalisation of a DPA. It is clear that the proposed Grange Road, Findon DPA is to facilitate a very specific land use and tenant. In response, the DPA effectively creates three layers of policy which restrict and limit the use of the land to facilitate the development of an ALDI store.

1. At base level, the rezoning will change the nature of the development from non-complying to a merit application.
2. The policy area seeks to reinforce the proposed zone provisions further supporting the use of the land as a supermarket.
3. The precinct layer then limits the potential land uses to: a supermarket, bulky goods outlet and integrated residential use.

Use of restrictive policies (aimed at facilitating a pre-determined development outcome) is likely to have the unintended consequence of limiting potential future development of the land for other appropriate land uses.

The number of companies within South Australia that observe the ALDI model of leasable area composition is limited. Consequently, by designing policies for a specific business model, the future tenancy and ownership of the site is undermined, and the future development of necessary community facilities could be limited. Based on the projected population increases mentioned in the 30 Year Plan for Greater Adelaide and the draft 2017 Update, demand for community facilities and similar institutional facilities will increase. Zoning and flexible policy approaches that also support such uses should therefore be protected.

Should the proposed rezoning of the affected area to Neighbourhood Centre Zone be pursued, it is submitted that greater flexibility of the policy suite is required so as not to prejudice future development of the land. Precinct level policy is not supported to further constrain development options for the land.

From a planning perspective, the development of a master plan would assist in broadly demonstrating whether the envisaged future land uses can be accommodated on the site in conjunction with necessary separation distances, landscaping, access, vehicle movement and parking requirements.

#### ***South Australian Planning Reforms***

The South Australian planning system is undergoing a comprehensive reform program which in the immediate term is seeking to limit the number of new rezoning proposals via the DPA process in favour of transition of planning policy via the Planning and Design Code (due for implementation by 2020). This places additional onus on DPA's under development to clearly demonstrate the suitability of land for rezoning. This is considered particularly so for what is essentially a "spot-rezoning" with an intended development in mind, and where an alternate and suitable development assessment pathway exists. Further, release of the Productive Economy discussion paper is imminent and should play a key role in considering the merits of the affected area for rezoning.

To this end we ask that Council give serious consideration for the matters raised within this letter and accompanying documentation.

I wish to reserve the right to be heard at the public meeting to be held on Monday, 18 February 2019.

Your sincerely

pp NU

Dean Kyros

Managing Director

Civic Built Pty Ltd

Level 1, 183 Melbourne Street,

North Adelaide, SA, 5006

Enclosed (2)





MLM/18-0257

28 November 2018

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Dear Dean,

**GRANGE ROAD, FINDON DPA  
TRAFFIC AND ACCESS PEER REVIEW**

Thank you for your instructions in relation to the above matter. You have requested that I undertake a review of the traffic and parking assessment that was completed to inform the assessment of the Development Plan Amendment (DPA) for the site on the corner of Noblet Street and Grange Road at Findon. Specifically you have requested that I consider and identify any traffic or safety matters which have not been adequately addressed or issues which could arise as a result of the future development envisaged on the subject site.

In forming my view in relation to this matter, I have reviewed the Traffic Impact Report prepared by InfraPlan dated August 2018 and the traffic modelling that is appended to this report. I have also considered the Concept Plan in the Draft DPA Assessment Report and reviewed the proposal in relation to relevant Australian Standards and traffic assessment guidelines.

**LAND USE**

The proposal seeks to vary the zone to provide for development of a supermarket and associated specialty or bulky goods tenancies. A DPA assessment would typically consider the impacts of a future land use on a site generically and provide an assessment in respect to the highest and best use for the site. This will mean that the traffic assessment will allow for the highest generating option for the land, with the assessment able to be refined for the particular proposal within a Development Application (DA).

The subject assessment has not adopted this approach but rather has considered a specific proposal for the land, understanding the proposed floor area of the supermarket to the square metre and the exact number of proposed parking spaces.

While the proposal defined will be close to the highest and best use for the site in terms of traffic generation (albeit the generation rates for the retail component are low), it is not clear as to how



the site would be utilised and whether the design would be able to be functional. Given that it has been considered to such a level to be able to define parking space numbers and exact floor area, there should be adequate information to prepare a master plan for the site which will provide an improved understanding of how design aspects will inform planning policy (such as provisions in relation to the safe and efficient movement of people and goods).

## **PARKING**

The InfraPlan assessment indicates that the current zone “requires” a parking provision of 7 spaces/100m<sup>2</sup>. I do not concur with this statement as the Development Plan is only a guide and therefore the recommended parking provision in the Development Plan is not a requirement per se.

The report has considered two options for parking depending on the zone ultimately adopted (albeit I note Council’s brochure identifies the proposal to be a Neighbourhood Centre Zone) namely:

- the rates which would apply to a designated area, as defined in the Development Plan; or
- a rate of seven spaces per 100 m<sup>2</sup> as in Table ChSt/2A of Council’s Development Plan. The report has then justified a lower parking rate in relation to the proposal on the subject land. While I agree that the rate of seven spaces per 100m<sup>2</sup> is not consistent with current parking generation rates at retail sites, the report provides no direction as to how the DPA should respond to this reduction. Rather it treats the parking assessment as though the subject matter was a DA, having assumed that a certain number of spaces can be provided.

If the site is to be in a Designated Area, this would potentially address this issue but clearer advice is warranted in regard to this matter.

While a masterplan of the site would generally confirm the number of parking spaces which could be provided, the assumption that the area needed for a parking space is 40m<sup>2</sup> is too generic to apply to a small site where the area of land required to create loading and access has not been considered. Further, this rate generally applies to a standard grid car park design and does not consider inefficiencies created by the shape of the tenancies within the development proposal.

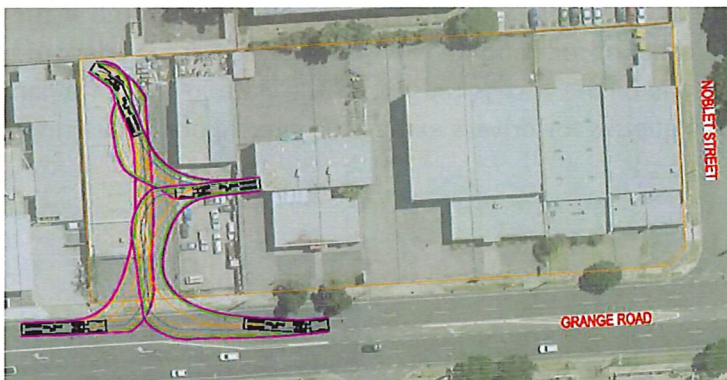
Further, there is no commentary in respect to the design of the car park. While it is noted that the detail of the car park design would be a matter for a DA on the land, it is important that the DPA addresses appropriate design criteria that should be adopted. This will assist in the development of appropriate policy that applies to the subject DPA.

A review of the master plan for the site would enable confirmation that an appropriate car park design, consistent with relevant Australian Standards can be established and that the provision envisaged as being required by development on the site can be achieved.



## LOADING

The report identifies that loading will occur to and from Grange Road in accordance with Aldi policy and procedures. There has been no assessment of whether the Aldi policies and procedures are consistent with the relevant Australian Standards. Such a review is warranted. Further, there has been no consideration as to how the turning movements for the delivery vehicle will be accommodated on the land without impacting on the safety or operation of the car park. Figure 1 illustrates the turning movements of a 20 m semi-trailer (which is reportedly the size of the deliveries) entering and exiting the site in a forward direction (at the western end of the land as identified in the InfraPlan report).



**Figure 1: A semi-trailer turning movements entering and exiting the site in a forward direction.**

You can see from the above figure that the truck path would utilise a large area of the subject land and would require a very large crossover. InfraPlan were (quite rightly) critical of the width of an existing 18 m wide crossover which impacts on pedestrian safety. The proposed crossover would need to be 22 m which is wider than the existing access.

Further, while the report acknowledges that the loading may require a separate access which would be subject to approval by the Department of Planning, Transport and Infrastructure (DPTI) in considering the DPA, it is important to understand that an appropriate delivery access associated with the proposed land use can be achieved, particularly given the size of the land and the width of the access required. This matter warrants further review and confirmation from DPTI that the delivery access arrangements can be endorsed.

## ACCESS

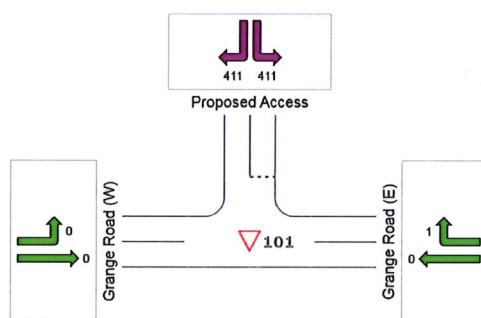
It is important to understand how access can be achieved for a site so that direction can be provided in a concept plan to inform the future development of the site. The report does consider access options but does not provide a clear recommendation as to the preferred access arrangements for the land. Nor does it adequately review the impacts or whether the access would be adequate to service the site. While this need not be definitive in the Concept Plan and it may be necessary to alter at the time of development due to land ownership and title boundary constraints, it is deficient to not at least understand then an access option for the site can be achieved and the ramifications of the options considered.



The Concept Plan has identified an access option but it is not consistent with the traffic report options and does not represent an access solution that has been demonstrated to be safe and functional

In regard to the access assessment, the following matters are examples of issues that have not been addressed in the assessment:

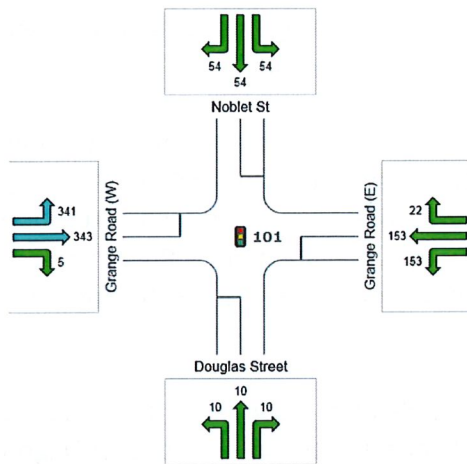
- The impact on traffic using John Street should right turn movements be prohibited at this location and the potential for U-turns to be generated on Grange Road or alternative routes through residential streets to impact residents if this right turn was to be removed;
- The length of the queue likely generated by the subject development to understand if the channelised right turn lane to the site could accommodate the queue or if there is adequate capacity to exit the site. A SIDRA analysis of the access (based on the data in the InfraPlan report) shows that there would be long queues for drivers exiting the site. Figure 2 illustrates the queue results of this analysis.



**Figure 2: queue results from the SIDRA access analysis**

The above analysis has also not considered the queue from Findon Road identified in the InfraPlan report which will extend past the access location, making it impossible to turn right out during peak hours (thus creating a greater exit restriction);

- There has been no assessment of the potential traffic impact in Noblet Street. This area is residential in nature and there should be an understanding as to whether the change in land use will impact the amenity of these residents and whether the volumes would change the nature or function of Noblet Street. Of note is that the traffic distribution indicates that 10% of vehicles could use the northern end of this street when travelling to and from the site.
- There has been no analysis of the operation of a signal at Noblet Street. A preliminary analysis of a signal at this location illustrates that the queue would extend into the Grange Road/Findon Road intersection during the morning commuter peak, as illustrated in Figure 3.



**Figure 3: Preliminary analysis of the queue length at the Grange Road/Noblet Road intersection during morning commuter peak, should it be signalised.**

During the pm peak, the queue from the Grange Road/Findon Road intersection would extend across a signalised intersection at Noblet Street. Such queueing creates safety conflicts on the road;

- There has been no assessment as to whether, despite the potential warrant, a traffic signal solution would be acceptable to DPTI. There is a separation of less than 200m between the Findon Road/Grange Road signalised intersection and Noblet Road and DPTI typically require at least 400m separation between signalised intersections. This warrants further review and analysis to understand if this option can be considered.

Substantial further investigations are required in order to understand if safe access to the site can be achieved for the type of proposed development of the land. While it is agreed that it is desirable to minimise and consolidate access points, nomination of access for the site which are not properly designed and will not cater for the anticipated traffic volumes or movements will create more substantial potential conflicts on the arterial road network and should not be supported.

## TRAFFIC ASSESSMENT

A number of deficiencies in respect to the traffic assessment, as it relates to the proposed access and associated impact on adjacent roads, were identified in the Access section above. A holistic assessment is required at this DPA stage of development to understand the broader traffic implications associated with development of the entire site. To postpone such a review to the DA stage of the development would pose the risk that access requirements and broader traffic impacts have not been considered collectively.

That is not to say that a detailed assessment of the DA is required in this traffic study, but rather a high level assessment of access requirements and traffic impacts associated with the higher volumes which will be generated by the development of the land and the implications of how these issues can be addressed when the site is developed. This information would ensure the





access shown on the concept plans are appropriate. The current arrangements indicated on the Concept Plan would not provide for safe and convenient access to the land.

The SIDRA analysis of the Grange Road/Findon Road intersection is a good example as to how the traffic impacts have not been adequately addressed. The results of the analysis show, quite clearly, that the intersection has not currently reached saturation and will exceed saturation on the Grange Road approach following completion of the development. Put simply, the development will impact the function of this intersection and trigger the need to upgrade this facility.

The reporting of the SIDRA modelling does not provide details of the queue or delay impact on each approach which is necessary to understand the actual impact of the intersection. A Degree of Saturation of 1.06 on the Grange Road (east) approach is substantially higher than acceptable for the operation of a through lane on an arterial road. While a DOS of slightly higher than 1.0 may have been accepted previously for, say, a right turn from a minor road, it is not an acceptable outcome for the through lane of an arterial road.

While interrogation of the SIDRA output provided enables limited information (as it is the summary performance of the intersection rather than the complete results), it is still evident that there will be a substantial increase in queues and increases in delays to drivers of up to 45% in some instances. A more definitive understanding of the impacts would be possible if the entire output or the model was to be provided and this should be requested by Council.

The explanation that the existing situation model (or the base case as it is typically defined) does not represent the actual performance of the intersection is not acceptable. The requirement of SIDRA 7 modelling guidelines is that the base case is verified to ensure the model is indicative of the site operation. There are a number of mechanisms in SIDRA which can be used to provide a model which is generally reflective of the existing situation which then provides a sound base to use to assess the forecast scenario. This is a requirement of DPTI modelling procedures.

Substantial review of the model is essential to better understand the potential impact that the development of the subject land will have on the operation and function of the Grange Road/Findon Road signalised intersection and what upgrade requirements could be triggered by this future development. While it may not be the responsibility of a developer to upgrade public infrastructure to a better performance standard, it is common that upgrades to maintain the status quo situation in respect to the signal operation are implemented as a result of a development. This may necessitate works at the intersection. In any event, it is important that the assessment accurately reflects the potential impact to public infrastructure as part of a DPA assessment.

## SUMMARY

In summary, there are many deficiencies in the current traffic impact assessment that has been completed for the DPA. It would appear that some of this has arisen by the lack of information provided to InfraPlan, albeit further analysis to understand the traffic impact is, nonetheless,



required. Of note is that the access and resultant traffic impact assessment for the site does not provide a position in respect to either an appropriate access solution or any associated impacts which will result in potential traffic safety implications on Grange Road and impacts on adjacent residents.

The following matters, in particular, warrant further review:

- The analysis of the Grange Road/Findon Road intersection in accordance with appropriate modelling standards and to DPTI requirements, including identification of potential upgrades to achieve at least status quo operation standards at the intersection;
- Identification of appropriate access arrangements for the site which could be illustrated on the concept plan. This should include analysis of the potential impact of the access, confirmation that safe and convenient access can be achieved for domestic and commercial vehicles and that there are not substantial implications on the adjacent road network;
- Preparation of a master plan which identifies potential development for the site and identification that appropriate parking and loading operations can be achieved on the land in accordance with relevant Australian Standards;
- Improved clarification of parking rates to apply to development on the site; and
- Assessments of any traffic impact on residential streets adjacent the site.

In addition to the above, I consider that it is important to liaise directly with DPTI in relation to potential future access on Grange Road. If such access cannot be achieved (as the preliminary analysis in this report would suggest), then it may impact the feasibility of development of the land and this should be understood during the DPA assessment as it will potentially impact the viability of the DPA or at least the development of the concept plan and/or the relevant policies.

There may also be a requirement by DPTI that an Infrastructure Agreement be prepared to ensure that the developer is committed to the completion of the necessary public works required as a result of the development on the land. This matter needs to be resolved during the DPA assessment.

Of particular note is that the traffic assessment currently provided does not adequately confirm that an access solution can be achieved for the site. This is essential to provide for appropriate future development of the land is to be rezoned.

Yours sincerely,  
**MFY PTY LTD**

A handwritten signature in black ink, appearing to read 'Melissa Mellen'.

**MELISSA MELLEN**  
Director





# 263A-275 Grange Road, Findon

## Peer Review of Economic Impact Assessment

November 2018



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## Introduction

This report presents a peer review of the Jones Lang LaSalle (JLL) Economic Impact Assessment (EIA) Report, titled '*Proposed Retail Development – 263A-275 Grange Road, Findon*' undertaken in May 2018 for the City of Charles Sturt.

The purpose of this report is to examine the general methodology, data and assumptions adopted in the report prepared by JLL and comment on the key findings and conclusions presented in the report.

This report is presented in two sections as follows:

1. The key findings and conclusions of our peer review of the JLL report.
2. A detailed overview of the JLL report including methodology, the key data sets used and its key findings.

## Section 1: Key findings

The key findings of our peer review are outlined below, based on the detailed analysis provided in the following section:

- The JLL report does not provide sufficiently detailed information on the size of the intended uses for the site, nor does it consider the planning context of the site which is typically included in EIAs.
- MacroPlan does not agree with the method JLL used in estimating trade area residents' supermarket expenditure, and considers the analysis to be overly simplistic. In the preparation of retail EIAs, the majority of retail/property consultants use MarketInfo to estimate the available retail market, which is widely viewed as the best available estimates for retail expenditure.
- The JLL report fails to provide a detailed assessment of supermarket/retail demand and market gap within the main trade area. MacroPlan considers that this analysis is required to demonstrate if the proposed Aldi supermarket is supportable at the subject site.
- The JLL report provides an estimate of first year sales for the proposed Aldi supermarket in 2021, however does not provide any analysis backing up this estimate. The figure also seems low for an Aldi supermarket given the average sales of Aldi stores is currently \$17 million.
- The JLL report forecasts supermarket specific impacts for a range of supermarkets/centres in the surrounding region at 2021. It is unclear how these retail sales were estimated and JLL has not provided any explanation of their approach. MacroPlan has concerns with some of the estimates used, and some of the impacts are unjustified and appear too low. Furthermore, some of the statements and assertions made by JLL cannot be verified.

- The JLL report fails to provide any assessment of potential benefits of the proposed development, and thus the possibility that it is likely to result in a net community benefit cannot be concluded.

Overall, MacroPlan considers that the EIA is missing some critical information usually included in EIAs, and that the key conclusions of the report cannot be substantiated based on the provided analysis.

## Section 2: Peer review of JLL report

This section of the report provides MacroPlan's detailed commentary and analysis for each section of JLL's Economic Impact Assessment (EIA) report, including methodology, key data sets used and key findings.

### Section 1: Introduction

This section of the JLL report describes the location of the subject site, and summarises the proposed uses for the site.

The JLL report states that the subject site has a total area of approximately 8,344 sq.m, with the Aldi supermarket proposed to accommodate around two thirds of this area. The remainder of the site is proposed to comprise an additional retail tenancy or tenancies, with the retail uses sharing carparking. JLL does not state the size of the proposed Aldi supermarket or the additional tenancy/tenancies in the report, nor state the carparking requirements for the retail development.

The *'Draft Grange Road, Findon – Development Plan Amendment'* released by City of Charles Sturt in October 2018 refers to a background information document provided by Ekistics, acting on behalf of ALDI Stores Pty Ltd, which states that the Aldi store will likely comprise 5,714 sq.m of the 8,344 sq.m site, and that the Aldi store will have a net floor area of 1,722 sq.m. It is also noted that 94 car parks are intended to be provided for the Aldi store, with an additional 44 spaces for the associated retail development.

MacroPlan considers that the area for the Aldi supermarket is adequate for the provision of a freestanding Aldi supermarket and associated carparking. The amount of the carparking intended to be provided for the store, at around 5.5 spaces per 100 sq.m, is also considered adequate for a typical supermarket development, which typically include around 5 spaces per 100 sq.m.

The JLL report fails to discuss the planning context of the subject site. MacroPlan understands that Council is undertaking a privately funded Development Plan Amendment (DPA), which proposes to rezone the subject site from the current Mixed Use Zone to the Neighbourhood Centre Zone. The DPA also proposes the creation of a new precinct – Findon Centre East – which covers the intended use for supermarket, large format retail and residential uses.

**Overall, this section of the JLL report does not provide sufficiently detailed information on the size of the intended uses for the site, nor does it consider the planning context of the site which is typically included in EIAs.**

## **Section 2: Economic Impact Assessment - Supermarkets**

This section of the JLL report defines the trade area for the proposed Aldi supermarket at Findon; presents population forecasts and the socio-demographic profile and supermarket expenditure capacity for each of the trade area sectors; provides a brief overview of the network of existing and proposed competitive centres within the trade area and surrounding area; and estimates competitive impacts of the proposed Aldi supermarket on the surrounding network of supermarkets.

### 2.1 Retail trade area

The trade area outlined in the JLL report comprises three sectors, including a primary sector and two secondary sectors to the north and south. The broad primary sector encompasses the suburbs of Findon, Beverley, Allenby Gardens, Welland, West Hindmarsh, Flinders Park and Kidman Park, as well as parts of the suburbs of Fulham Gardens, Seaton, Woodville West and Woodville South. JLL states that the defined trade area has regard to the location of the existing Findon Shopping Centre as well as the location of existing Aldi supermarkets in the surrounding area. The trade area map is relatively unclear, with none of the retail facilities labelled. A trade area map completed by MacroPlan showing the location of supermarkets in the region is provided in the **Appendix** of this report.



The extent of the trade area or catchment that is served by any shopping centre is shaped by the interplay of a number of critical factors. These factors include the relative attraction of the centre in comparison with alternative competitive retail facilities; the proximity and attractiveness of competitive retail tenants or centres; the available road network and public transport infrastructure, which determine the ease (or difficulty) with which customers are able to access a shopping centre; and significant physical barriers which are difficult to negotiate, and can act as delineating boundaries to the trade area served by an individual shopping centre.

Taking into consideration the above factors, MacroPlan considers the trade area which is likely to be served by the proposed Aldi supermarket would reflect the high profile location of the subject site on Grange Road, the main east-west thoroughfare in the region; the likely role and function of the proposed development, which is planned to include an Aldi supermarket and a number of other retail tenancies; and the location of existing and planned shopping centres throughout the surrounding area, namely Findon SC to the immediate west of the subject site and the surrounding network of Aldi stores.

Based on these factors, the trade area defined by JLL seems quite expansive, with the likelihood of residents in the secondary sectors visiting an Aldi supermarket at the subject site expected to be quite low, given the existing Aldi supermarket facilities in the surrounding area.

**Overall, the trade area defined by JLL is considered to be too broad for a proposed Aldi supermarket at the subject site, particularly given the location of existing Aldi supermarkets in the area such as at Armada Arndale to the north-east and at Adelaide Airport to the south.**

## 2.2 Competition

In the report, JLL outlined the existing supermarkets in the surrounding area relevant to the subject site in Table 1. These supermarkets are illustrated in Figure 3, however the supermarkets are not labelled. MacroPlan conducted a detailed review of the surrounding competitive context and accepts all existing supermarkets of relevance to the subject site have been reviewed by JLL in Table 1.

The JLL report also addresses the relevant proposed future supermarket developments in the surrounding area, namely a proposed Foodland supermarket development in West Lakes, which is located beyond the trade area. JLL notes that this development is not of relevance to the subject site, and MacroPlan agrees with this sentiment.

**This section provides a sufficiently detailed review of the existing and future competitive context of the area.**

## 2.3 Demographic analysis of trade areas

The socio-demographic profile outlined in the JLL report is generally in line with the Greater Adelaide region, with the secondary south sector typically more affluent owing to the inclusion of seaside areas. MacroPlan agrees with the summary of the key demographic characteristics of the trade area provided by JLL in the report.

## 2.4 Retail spending

In the report, JLL's estimates of per capita supermarket expenditure are based on retail trade data provided by the Australian Bureau of Statistics. JLL then compares the total retail trade for South Australia to the state's population to estimate the average spending at supermarkets per person across the state. JLL then made adjustments to the average spend taking into account the median income levels of residents in each trade area compared with South Australia.

JLL then provides an estimate of the available supermarket spending in the trade area by multiplying the average spend per person by the population in each trade area sector. However, the trade area population has thus far in the report not been detailed.

MacroPlan does not agree with this method of estimating trade area residents' supermarket expenditure. MacroPlan also considers JLL's method of tailoring average spending at supermarkets per person across South Australia to the specific trade area sectors by adjusting the figure to take into account income levels to be overly simplistic and flawed. Many other factors in addition to median income levels influence supermarket spend, such as age profile, size of household, ethnicity, etc.

MacroPlan uses *MarketInfo* data in the preparation of retail Economics Impact Assessments. MarketInfo is developed by Market Data Systems (MDS) and utilises a detailed micro simulation model of household expenditure behaviour for all residents of Australia. The model takes into account information from a wide variety of sources including the regular ABS Household Expenditure Surveys, national accounts data, Census data and other information. The MarketInfo data for spending behaviour used by a majority of retail/property consultants, and has been widely tested in panel hearings.

**Overall, MacroPlan questions the reliability of the spending figures detailed in the EIA, and has concerns that the JLL report may under or over-estimate the available supermarket expenditure in the trade area and therefore the demand for supermarket facilities. This may have implications on the key findings detailed the report.**

## 2.5 Population and population forecasts

In the report, JLL relies on the official State Government projections and then adjusts the numbers based on localised dwelling activity in order to estimate the future growth in population within the main trade area. MacroPlan does not have an issue with this approach, as this is the typical approach when preparing retail EIAs.

The main trade area population outlined in the JLL report is estimated at 59,400 people in 2016, including 33,700 people in the primary sector, and is projected to grow to 62,700 people by 2021 and 69,000 people by 2031. JLL does not provide current population estimates at 2018.



MacroPlan's analysis of the main trade area is broadly consistent with these findings, with the main trade area population estimated at 60,400 people in 2016, with the difference of 1,000 residents occurring in the secondary south sector. This slight difference is considered immaterial in the context of the overall analysis and key findings.

**The trade area population estimates and forecasts provided in the EIA are acceptable.**

## 2.6 Economic impact assessment

It is firstly noted that the JLL report fails to provide a detailed assessment of supermarket/retail demand and market gap within the main trade area. MacroPlan considers that a retail market demand and gap analysis is required to demonstrate if the proposed Aldi supermarket is supportable at the subject site, and such analysis is typically included EIAs.

In the report, JLL provides an estimate of first year sales for the proposed Aldi supermarket of \$14.4 million in 2020/21, however does not provide any analysis backing this estimate. In addition, it is not clear if it represents an estimate of full supermarket sales, including liquor and general merchandise, or just food and grocery sales. MacroPlan notes that around 8-10% of the turnover of a typical Aldi supermarket is made up of liquor sales, and up to around 20% is made up of general merchandise sales.

The sales potential of any particular retail facility is determined by a combination of a range of critical factors. These factors include the quality of the future facility, with particular regard to the major trader/traders which will anchor the centre; the strength of the tenancy mix relative to the needs of the catchment which it seeks to serve; the size of the available catchment which the centre will to serve; and the location and strengths of competitive retail facilities and the degree to which those alternative facilities are able to effectively serve the needs of the population within the relevant trade area.

Taking into consideration the above factors, the sales potential for the proposed Aldi supermarket would reflect the high profile location of the subject site on Grange Road; the location of Findon SC immediately west of the subject site; and the location of competing

Aldi stores throughout the surrounding area – namely at Armada Arndale, West Lakes and Adelaide Airport.

MacroPlan has assessed the forecast sales for the store at 2021 (including general merchandise and in constant 2017/18 dollars) and in our view JLL's forecast is low. In 2017 Aldi operated some 470 stores and achieved sales of around \$8 billion (sourced from published data). This corresponds to average sales of approximately \$17 million. A figure of \$14.4 million is some 15% below the current average, and it considered unlikely that Aldi would consider opening a store at the subject site if the supermarket were to trade at that level. More analysis is required to justify the estimated trading level of the proposed Aldi supermarket. An underestimate of the potential sales for Aldi would result in the potential impacts from the future store being underestimated.

The JLL report forecasts supermarket specific impacts for a range of supermarkets/centres in the surrounding region at 2021. To do so, JLL estimates the turnover of these supermarkets at 2021, assuming the proposed Aldi supermarket is not developed, using a market share approach. It is unclear how these sales were estimated, and JLL has not provided any explanation of their approach. It is also unclear if these sales only relate to food and groceries, or are inclusive/exclusive of liquor and general merchandise turnover. JLL has also failed to provide current turnover estimates for the supermarkets.

MacroPlan sourced the current sales for each shopping centre/supermarket, where available, from reported sales in publications such as Shopping Centre News and from the Property Council of Australia. If reported sales are not available, sales were calculated based on the retail floorspace of each supermarket multiplied by an appropriate turnover per sq.m. Current sales were then grown out to 2021, based on forecast retail expenditure growth in the region. MacroPlan generally agrees with JLL's estimates of turnover for some the selected supermarkets/centres in 2021, however the estimates for Findon SC, Westside Findon, Fulham Gardens SC and Brickworks Marketplace appear to be significantly different to what is considered reasonable for those centres.

The JLL report details that \$9.92 million of the total sales of \$14.4 million are expected to be drawn from the group of individually assessed centres. This leaves \$4.48 million that is assumed to be drawn from 'other' centres, which have not been detailed. MacroPlan considers the impact on 'other' centres, which accounts for 31.1% of the total Aldi sales, to be far too high. A more acceptable proportion to be drawn from 'other' centres for this analysis is considered to be at most 15 – 20% of total sales, particularly allowing the network of existing Aldi supermarket already serving the market.

If, say, the sales potential for Aldi is estimated at \$17-18 million, with up to 20% coming from centres not specified, that would leave \$14 million to be spread across the identified centres. This is some 40% above the figure \$9.9 million, and adopting a higher figure may have result in much higher impacts on some identified centres.

MacroPlan considers that much of the impact from the development of a new Aldi supermarket at Findon will fall on the existing Aldi stores in the region, namely at Armada Arndale, West Lakes, Adelaide Airport and Kilburn. In addition, the impacts projected on other retail facilities in the immediate area such as at Findon SC, Westside Findon and Fulham Gardens SC, are likely to be higher than as detailed in the EIA.

The JLL report also states that 'the lost trade as a result of the introduction of the new competition supermarket will be recouped in two years or less'. JLL has not provided any evidence to sustain this claim.

The JLL report discusses the implications for relevant proposed centres, namely new supermarkets at Bowden and West Lakes. JLL states that both developments will be located beyond the trade area, and therefore they have not assessed the impacts of the proposed Aldi supermarket on these stores. MacroPlan agrees with this assertion.

MacroPlan notes an error in Table 6, namely that the forecast sales for Aldi Findon are included in the column titled 'Without Aldi Findon', when it should be included in the column titled 'With Aldi Findon'.



The JLL report states that 'the impact of the proposed Aldi supermarket is not considered to be significant', and backs this up by stating that 'an impact of less than 5% is generally not considered to be significant [in retail analysis]'. MacroPlan considers this statement to be generally true, though as stated previously not all impacts are likely to be less than 5%.

The JLL report states that 'turnover at each supermarket/centre is expected to be greater in 2021 than current turnover, despite the additional competition from the Aldi supermarket'. JLL has not provided turnover data for current sales, and thus this statement cannot be verified. MacroPlan has assessed the projected impact on Findon SC and finds that this statement is not correct, with supermarket sales at the centre expected to be slightly lower than current sales in 2021.

The JLL report fails to provide any assessment of possible community benefits that may result from the proposed development. Without due consideration of the potential benefits it is not possible to conclude if a net community benefit or disbenefit is likely to result from the development of the proposed Aldi supermarket at the subject site.

**Overall, this section of the EIA fails to provide a detailed assessment of supermarket/retail demand and market gap within the main trade area, does not detail the analysis behind the Aldi supermarket sales projections or the estimate of supermarket sales at surrounding facilities, and the approach adopted by JLL in examining impacts is considered to require more reasoning and analysis. Most importantly, EIAs generally need to assess the likelihood of a net community benefit arising from the proposed development. Based on this EIA, no conclusion on the potential for net community benefit to arise can reasonably be reached.**

## 2.7 Conclusions and further comments

This section of the JLL report concludes with the statement that the proposed Aldi supermarket would be expected to bring new customers to the broader Findon shopping precinct, which may result in increased trade for Findon SC and thus a reduced impact over what was forecast by JLL. There is no evidence provided to support this statement.

In the report, JLL also point out that Aldi supermarkets derive a large portion of their sales from non-grocery items, and therefore do not directly compete with supermarkets. This is a highly questionable conclusion, given that Aldi is a supermarket and the far majority of its sales are derived from food and groceries.

**The conclusions are not considered sufficiently robust for a reader to make an informed decision on the likely economic impacts and benefits from the proposed development.**

### **Section 3: Economic Impact Assessment – Bulky Goods**

This section of the JLL report provides background information on large format retailing; defines the trade area for the proposed large format retail uses at the centre; provides a definition of large format retail and an example of large format retail goods; presents the large format retail expenditure capacity for each of the trade area sectors; provides a brief overview of the network of existing and proposed competitive large format retailers within the trade area and surrounding area; and discusses the implications of providing large food retail facilities at the subject site. There is no qualifying statement in the report detailing the purpose of inclusion of the large format retail EIA.

#### 3.1 Background

The JLL report describes the growth factors and location characteristics of large format retailing in Australia. MacroPlan agrees with this assessment.

#### 3.2 Trade area

The JLL report assumes that the proposed Aldi supermarket will be the main tenant at the subject site, and thus the proposed large format retail facilities at the subject site will have the same trade area as that defined for Aldi in the previous section. Given the small amount of additional facilities proposed at the subject site, MacroPlan agrees with this assessment.

#### 3.3 Bulky goods definition

The JLL report provides a definition of large format retail and an example of large format retail goods. MacroPlan agrees with this definition.

### 3.4 Competition

The JLL report provides a brief overview of the competitive large format retailers in close proximity to the site and within the broader trade area. MacroPlan notes that JLL has not included a map illustrating the location of these facilities, nor have they provided an indication of the amount of large format retail floorspace in the trade area. JLL also fails to discuss any of the large format retail precincts located in the surrounding region.

### 3.5 Bulky goods retail spending

The JLL report states that 'it is generally regarded that the bulky goods sector accounts for around 20% of the retail market'. MacroPlan agrees with this statement.

JLL then estimates the available large format retail spending capacity of residents in the trade area by taking 20% of the total retail spending market of the trade area. MacroPlan notes that JLL has not previously defined the total retail expenditure capacity of trade area residents, having only previously defined the supermarket spending market.

JLL then calculate the amount of supportable large format retail floorspace in the trade area by applying a sales turnover rate of \$3,500 per sq.m to the available trade area large format retail spending. MacroPlan understands that generally, homemaker stores across Australia generate sales in the order of \$3,000-\$4,000 per sq.m, and consider that \$3,500 per sq.m is generally an appropriate average trading level.

### 3.6 Conclusions and further comments

This section of the JLL report concludes with the statement that the potential scale of large format retail facilities to be provide a the subject site, at less than 2,000 sq.m, is too small to have a noticeable impact on the overall supply-demand balance in the trade area.

**MacroPlan supports the overall conclusion in principal; however JLL report fails to provide sufficiently detail information or analysis, and does not include a detailed assessment of large format retail demand and market gap within the main trade area. MacroPlan considers that analysis needs to be evaluated with detailed plans for the site which is not provided.**



# Appendix



263A-275 Grange Road, Findon  
Trade area and major anchor retailers



**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 16***

---

FW: Draft Grange Road, Findon DPA- Submission

-----Original Message-----

From: David Van Hung Le [REDACTED]  
Sent: Friday, November 30, 2018 2:03 PM  
To: Georgina House  
Cc: David Van Hung Le  
Subject: Draft Grange Road, Findon DPA- Submission

Draft Grange Road, Findon DPA- Submission

30.11.2018

Dear Madam/Sir Chief Executive Officer,

I'm living next to it, since 2006, and happy to see something could be better. However, could you consider the seriousness of having good air quality, because the site soil could be contaminated (not be in assessment yet as written in your council report).

No need thinking about asbestos , just only normal dust the soil are being allowed to be stirred up by blowers daily and sinfully contaminating our lungs!

We should do better and should not be like Adam, the first manager, who was given almost everything except only one thing as written: "15 The LORD God took the man and put him in the Garden of Eden to work it and take care of it. 16 And the LORD God commanded the man, "You are free to eat from any tree in the garden; 17 but you must not eat from the tree of the knowledge of good and evil, for when you eat from it you will certainly die." (in Genesis 2: 15-17).

In fact if human do well, there is no need for Jesus going through suffering of death, even on a cross, then rising from the dead back to life, that His Believers are given eternal life. We need Jesus for the basic eternal safety, yet we also need considering for each project like this. And I thank you for allowing people to have a voice in this DPA.

Merry Christmas 2018  
David Van Hung LE,  
[REDACTED]



**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 17***



## Jim Gronthos

---

**From:** Rushforth, John (Housing) <John.Rushforth@sa.gov.au>  
**Sent:** Thursday, 25 October 2018 3:29 PM  
**To:** Jim Gronthos  
**Subject:** Draft Grange Road DPA ( Privately Funded)

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Dear Jim

thank you for the opportunity to comment on this DPA. The South Australian Housing Authority comment on behalf of the abutting SAHT property (Allotment 33) and generally in accordance with its interest in promoting affordable housing in the State.

Comments:

1. Ensure that stormwater design takes into account and prevents possible flooding of the SAHT property as a consequence of any proposed development on the affected area, including the proposed raising of the finished floor levels (FFLs) to 400-500mm above current site levels which could potentially dam water on the SAHT site.

2. Affordable Housing: The area being rezoned exceeds 11 000m<sup>2</sup> and the potential for a significant residential components exists. The SA Housing Authority has no objection to the proposed rezoning to the Neighbourhood Centre Zone, Findon Policy Area 10, Precinct 84- Findon Centre East. The SAHA encourages Council to consider the following affordable housing, policy inclusions:

Include within the Neighbourhood Centre Zone and/ or in Policy Area 10, the following policy direction:

-PDCs

Land use:

- Affordable housing.
- Development comprising 20 or more dwellings should include a minimum of 15 per cent affordable housing.
- Incentives
  - o Where a minimum of 3 hours sunlight access on 21 June to habitable rooms and open space of dwellings in adjoining zones can be maintained, the following dispensations apply to development:

Form of development	Additional building height above maximum allowed height in zone	Car parking reduction (rounded to nearest whole number)
Development which includes more than 15 per cent of dwellings as affordable housing (as defined by the <i>South Australian Housing Trust Regulations</i> as amended)	1 storey	30 per cent



Kind regards

John

John Rushforth

Senior Urban Planner

Transaction and Property Services  
SA Housing Authority

Phone: 08 8207 0212

Email: [john.rushforth@sa.gov.au](mailto:john.rushforth@sa.gov.au)

Visit Housing SA at: [www.sa.gov.au/housing](http://www.sa.gov.au/housing)

Level 5 West  
Riverside Centre, North Terrace, Adelaide SA 5000

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**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 18***



*In reply please quote: #13283316  
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 Jim Gronthos

Dear Mr Sutton

**CITY OF CHARLES STURT – GRANGE ROAD, FINDON DEVELOPMENT PLAN  
AMENDMENT**

Thank you for providing the Department of Planning, Transport and Infrastructure (the Department) with an opportunity to comment on the Grange Road, Findon 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 manner. Should Council experience any delays with the DPA, it 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**

It is noted that there are two other DPAs currently being undertaken by Council in the Kidman Park area, being the Findon Road, Kidman Park (North) Mixed Use DPA and the Findon Road, Kidman Park Mixed Use (Metcash site) DPA.



Whilst the Department raises no objection to this in principle, it is noted that the subsequent development of the three subject sites will likely have a cumulative impact on the arterial road network, including the Grange Road / Findon Road intersection. In this context, it is recommended that Council takes a coordinated approach to its traffic investigations to ensure the cumulative impacts of the DPAs are appropriately considered. It is suggested that Council continue to work closely with the Department in this regard.

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](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](mailto: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 me by phone on 7109 7036 or email at [nadia.gencarelli@sa.gov.au](mailto:nadia.gencarelli@sa.gov.au).

Yours sincerely



Nadia Gencarelli  
**TEAM LEADER, COUNCIL DEVELOPMENT PLAN AMENDMENTS**  
**DEVELOPMENT DIVISION**  
**DEPARTMENT OF PLANNING, TRANSPORT AND INFRASTRUCTURE**

/ /2018

Att – A – Agency Comments




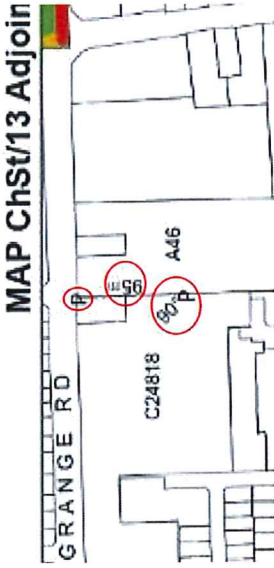
## ATTACHMENT A – AGENCY COMMENTS

### 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>	To note.
2.	The Amendment – Attachment B – Precinct 84 Findon Centre East – PDC 9	Correction required	It is considered that the word 'following' within PDC is unnecessary and can be deleted.	Amend PDC.
3.	The Amendment – Attachment B – Precinct 84 Findon Centre East – PDC 10	Overly prescriptive policy	It is considered that PDC 10 is overly prescriptive and may be difficult to apply in an assessment sense. It is therefore recommended that the PDC be reconsidered.	Amend PDC.

### Mapping Issues

No.	Section Ref	Issue	Discussion	Action required
4.	The Amendment – Attachment D – Overlay Map ChSt/13 Noise and Air Emissions	Amendments required	To provide clarity, it is suggested that the overlay map be updated to show a sliver of the	Amend map.

			<p>Type A and Type B Roads adjacent the affected area, for example:</p>  <p><b>ChSt/19 Adjoins</b></p> <p>N</p> <p>In addition to this, it is noted that the existing overlay shows a designated area adjacent to a railway line – this should be reinstated.</p>		
5.	The Amendment – Attachment D – Overlay Map ChSt/19 Noise and Air Emissions	Amendments required	<p>It is noted that the overlay map includes definition marks associated with the zone boundaries (highlighted below). Given the overlay map does not show zoning, these points of definition are unnecessary and should be removed.</p>  <p><b>MAP ChSt/13 Adjoin</b></p>	Amend map.	

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 19***

29 November 2018

SAW 97/02114

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

Dear Sir/Madam

**Re: Draft Grange Road, Findon Development Plan Amendment (DPA)**

I refer to the letter dated 4 October 2018 received from your office seeking our comments on the above DPA.

SA Water currently provides water and sewerage services to the subject area. Networks augmentation might be required should the proposed rezoning generate an increase in demands. The extent of the augmentation works (if required) will be dependent on the final scope and layout of the future development proposed to occur on the land subject to this DPA.

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 Grange Road, Findon Development Plan Amendment DPA. Please contact Peter Iliescu, Engineer, Wastewater Design Standards Planning on telephone (08) 7424 1130 or email [peter.iliescu@sawater.com.au](mailto: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](mailto:daniel.hoefel@sawater.com.au)

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***SUBMISSION 20***





**Natural Resources Centre**

205 Greenhill Road  
Eastwood SA 5063

DX 174, Adelaide

Tel 08 8273 9100

Fax 08 8271 9585

dwnr.amlr@sa.gov.au

[www.naturalresources.sa.gov.au/](http://www.naturalresources.sa.gov.au/)

[adelaidemtloftyranges](http://adelaidemtloftyranges)

Reference: F0000177632/18\_098

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

Dear Mr Sutton

**Re: City of Charles Sturt – Draft Grange Road Findon - Development Plan Amendment**

Thank you for providing the Adelaide and Mount Lofty Ranges (AMLR) Natural Resources Management (NRM) Board and the Department for Environment and Water (DEW) with the opportunity to comment on the Draft Grange Road Findon Development Plan Amendment (DPA).

It is understood that the purpose of the draft DPA is to rezone an area of Findon from mixed use zone to neighbourhood centre zone, to facilitate a potential supermarket and bulky goods retail development.

The DPA has been reviewed with the following comments provided for Council's consideration.

Policy alignment

The Adelaide and Mount Lofty Ranges Natural Resources Management Plan identifies the long term vision for the region's natural resources and the actions needed to maintain the natural systems that underpin them. It also provides more detail at a subregional level and identifies specific priorities for action within each subregion.

As the City of Charles Sturt draft Grange Road Findon DPA is in the Metropolitan Adelaide subregion, the Board suggests that the DPA should consider and align with the subregion's key priorities. These are detailed in the Regional NRM Plan and can be found on the AMLR region's website:

**[www.naturalresources.sa.gov.au/adelaidemtloftyranges/home](http://www.naturalresources.sa.gov.au/adelaidemtloftyranges/home).**

Relevant NRM Plan Priorities include:

- Reduce the impact of runoff from stormwater and priority watercourses on aquatic health, the coast and marine environments
- Protect urban watercourses for aquatic health and urban biodiversity outcomes (quality)



### Water Sensitive Urban Design

The board suggests that the DPA amendment could be strengthened through improved use of Water Sensitive Urban Design (WSUD) principles and stormwater recycling. Ideally, new policy should aim to achieve the recommended targets identified in the state government's ***Water Sensitive Urban Design - Creating more liveable and water sensitive cities in South Australia 2013***.

The DPA mentions the possible use of bioretention for water quality management and detention purposes, plus separate additional detention to meet pre-to-post-development peak flowrate requirements. It is recommended that the proponent and Council incorporate bioretention for the development, preferably in the form of more rain gardens and less single-objective underground detention storage. These types of treatment can offer multiple benefits including heat reduction, amenity and biodiversity improvements.

The desired character statement within the proposed DPA Amendment (p6 (PDF p228)), mentions:

*"It is important that development is located and designed to minimise impacts on the amenity of residential properties abutting the precinct, particularly with regard to building bulk and scale, as well as noise and odour from servicing arrangements and plant. This will be assisted with the development of an intensely planted landscaped buffer along the interface of the precinct with the Residential Zone."*

Similarly, existing policy (10) from the local development plan identifies that the residential boundary for this area of Findon Centre East should incorporate:

*"A landscape screen of at least 3 metres in width should be planted along the boundary with the Residential Zone and should comprise a densely planted row of trees which will achieve a mature height of at least 6 metres."*

Minimising amenity impacts could be reframed to instead focus on maximising the multiple benefits of the amenity elements of development in Precinct 84 – the buffer should be an active and integral part of the new development and would form the ideal location for (some of the) WSUD assets of the new development. It is noted that utilising WSUD design principles can also help to retain water for any landscaping that is required.

There are a number of sites within close proximity to the DPA amendment area that provide good examples of how WSUD and stormwater recycling can be successfully integrated into a planned development. This includes WSUD and stormwater recycling at St Clair, stormwater recycling at the Grange and Royal Adelaide Golf Course, rain gardens at Tracey Avenue, as well as the broader council stormwater recycling system. The recent Board collaboration with Council on installation of rain gardens at Tracey Avenue has highlighted the capability of Council engineers to develop and implement excellent in-house WSUD solutions, which could also be applicable here.



### **Green Infrastructure and Biodiversity**

There is an opportunity for the DPA to further manage impacts on stormwater management through policies which support early establishment of green infrastructure in combination with stormwater management. This would have the added benefit of reducing the urban heat island effect associated with increased hardstandings and buildings.

Recent thermal mapping completed by Council shows this area to be an area of moderate urban heat, caused by the prevalence of hard surfaces (buildings, car parks and roads). Urban heat may be exacerbated by further development of this precinct as an urban centre, affecting the adjoining existing residential land. Council could consider amending the policy to encourage the incorporation of white or light coloured roofs as well as additional green infrastructure for amenity, WSUD and cooling purposes. With careful planting selection, using native, locally sourced plantings, the rezoning could also improve biodiversity outcomes. Further information on suitable plantings for Adelaide can be found at the online plant selector here: <http://plantselector.naturalresources.sa.gov.au/>

If you require any additional information please contact Eilidh Wilson, Senior Policy Officer, on 8226 8547.

Yours sincerely

**Louisa Halliday**

**MANAGER PLANNING & EVALUATION**

**On behalf on the Adelaide and Mount Lofty Ranges NRM Board and DEW**

**Date:** 29/11/2018



**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***LATE SUBMISSION 21***



**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 280-162

Mr Jim Gronthos  
Senior Policy Planner  
City Of Charles Sturt  
72 Woodville Road  
WOODVILLE SA 5011

Dear Mr Gronthos

**Grange Road, Findon Development Plan Amendment**

Thank you for providing the Environment Protection Authority (EPA) with the opportunity to comment on the Grange Road, Findon Development Plan Amendment (DPA).

The EPA understands that the purpose of the DPA is to rezone the affected area from Mixed Use Zone to Neighbourhood Centre Zone to enable an ALDI supermarket and residential development to be constructed.

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.

The EPA has reviewed the DPA and provides the following comments for your consideration.

*Interface between land uses*

In its comments on the SOI the EPA identified the need for investigations be undertaken into the potential air and noise impacts of the proposed rezoning and subsequent redevelopment on existing residential development.

Such investigations were undertaken, including into potential impacts on future residential development within the affected area.

In response the DPA proposes policy within the Desired Character statement that identifies the need for development to be located and designed to minimise air and noise impacts on the amenity of adjacent residential properties.



The DPA also proposes that the Noise and Air Emissions Overlay be applied to the affected area.

In addition, the *Charles Sturt Council Development Plan* (consolidated 13 September 2018) contains the Interface between Land Uses module, which will assist with assessment of proposed development applications within the affected area.

The application of the proposed interface between land uses policies, the Noise and Air Emissions Overlay, as well as the existing policy within the development plan is supported by the EPA.

#### *Site contamination*

The EPA also identified in its response to the DPA that investigations into site contamination should be undertaken due to the nature of the activities currently and previously undertaken within the affected area.

A report, *Preliminary site investigation 263A – 275 Grange Road, Findon SA* (10 July 2018) (the ‘PSI’), was prepared by LBWco Pty Ltd. The PSI identified that potentially contaminating activities have been undertaken at the site including, but not limited to, a 10 KL underground storage tank (UST) registered in the Safework SA dangerous goods register. The UST could not be located during a site walkover by the consultant as part of the PSI.

The EPA notes from its review of the PSI that the area subject to the investigation was not the entire area that is proposed to be rezoned through the DPA. The part of the area that is currently occupied by a service station on the corner of Grange Road and Findon Road is considered in the report to be ‘off-site’; however, the service station site is clearly part of the affected area. The EPA notes that it is not clear from the DPA as to whether or not the service station would be retained in the future or would be replaced by the proposed supermarket and residential development.

As identified in the PSI the EPA has, in accordance with section 83A of the *Environment Protection Act 1993*, been notified of the existence of groundwater contamination at the site of the service station. Although the site of the service station was considered in the PSI, it was not considered in the context of the proposed rezoning and the potential for residential development to occur at the site of the service station and for it to be affected by groundwater contamination.

The EPA notes that the Charles Sturt Council Development Plan contains policy on site contamination within the Hazards module. It is advised that it may be necessary for additional policy to be included in the Desired Character statement for Findon Policy Area 10 identifying that site contamination may be present. This will ensure that site contamination is investigated and remediated (if necessary) to the appropriate extent at or before the development on the land is occupied.

The EPA considers, in accordance with EPA guidelines, that for a non-sensitive land use, a statement of land use suitability by a suitably qualified site contamination consultant is suitable. If a sensitive land use is proposed, a Site Contamination Auditor accredited by the EPA under Part 10A of the *Environment Protection Act 1993* should be engaged to carry out a Site Contamination Audit.

For further information on this matter, please contact Geoff Bradford on 8204 9821 or [geoffrey.bradford@epa.sa.gov.au](mailto:geoffrey.bradford@epa.sa.gov.au).

Yours sincerely

Kym Pryde

**PRINCIPAL ADVISER, PLANNING POLICY AND PROJECTS**

**PLANNING AND IMPACT ASSESSMENT**

**ENVIRONMENT PROTECTION AUTHORITY**

Date: 6 December 2018

**GRANGE ROAD, FINDON DEVELOPMENT PLAN AMENDMENT (PRIVATELY FUNDED)**

***LATE SUBMISSION 22***

## Jim Gronthos

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**From:** Jim Dimitropoulos [REDACTED]  
**Sent:** Monday, 10 December 2018 7:59 PM  
**To:** Jim Gronthos  
**Subject:** Fw: Proposed Aldi Development - Grange Road

Hi Jim

I realise that the public consultation period for the above proposal ended on the 30th November 2018 and I dont know if I am directing this email to the correct person.

However', I hope that Council is still open to hearing from surrounding businesses. There are 3 small businesses which operate out of 294 Grange Road Flinders Park.

From what we can see, the Aldi development means the right hand turn from Grange Rd to John Street will be closed off.

We believe that this will have a detrimental affect on our businesses as customers coming from the beach to the city along Grange Road or any potential new customers will have to travel further down Grange Road and then do a u-turn to come back to enter our premises. Anything that makes it more inconvenient for customers will have a negative effect on our businesses.

It is only fair that a plan that does not harm existing businesses should be considered.

Regards

Betty Kokkinos  
[REDACTED]