Charles Sturt Council

Kilkenny Mixed Use (Residential and Commercial) draft Development Plan Amendment (Privately Funded)

Summary of Consultation and Proposed Amendments (SCPA) Report

April 2021

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Introduction

This report is provided in accordance with Section 25(13) of the Development Act 1993 to identify matters raised during the consultation period and any recommended alterations to the amendment. The report also provides details of the consultation process undertaken by Council.

The SCPA Report should be read in conjunction with the consultation version of the DPA. Where relevant, any new matters arising from the consultation process are contained in this Report.

The Amendment reflects the recommendations of Council contained in this Report.

Consultation

Consultation Process

Statutory consultation with agencies and the public was undertaken in accordance with DPA process B (with consultation approval) and in accordance with Section 25(6) of the Development Act 1993; Regulations 10 and 11 of the Development Regulations 2008; and the agreed Statement of Intent.

The following Local Member(s) of Parliament were consulted on the DPA:

(a) Peter Malinauskas MP (Member for Croydon)

(b) Joe Szakacs MP (Member for Cheltenham)

(c) Hon Mark Butler MP (Federal member for Hindmarsh)

(d) Hon Steve Georganas MP (Federal member for Adelaide)

The response(s) are included within ***Attachment A***.

The consultation period ran from **Thursday 6 February 2020 to Tuesday 14 April 2020.**

Public Notification

Notices were published in the 'The Advertiser' on 6 February 2020, the Government Gazette on 6 February 2020 and The Messenger (Westside Weekly) on 5 February 2020. A further reminder notice was placed in the Messenger on 19 February 2020.

Council also had a web page dedicated to this project on the www.yoursaycharlessturt.com.au public consultation website, which included links to the DPA, Investigations Report and information brochure, as well as the ability to ask online questions and/or submit an online submission.

In addition, Council wrote to approximately **868 property owners and occupants** within and adjacent to the Affected Area (see **Figure 1**). The letter and information brochure provided details of the DPA and consultation process and dates.

The DPA documents were also made available at Council's Civic Centre and five libraries.

A copy of the DPA was forwarded to the Department of Planning, Transport and Infrastructure on 22 January 2020.

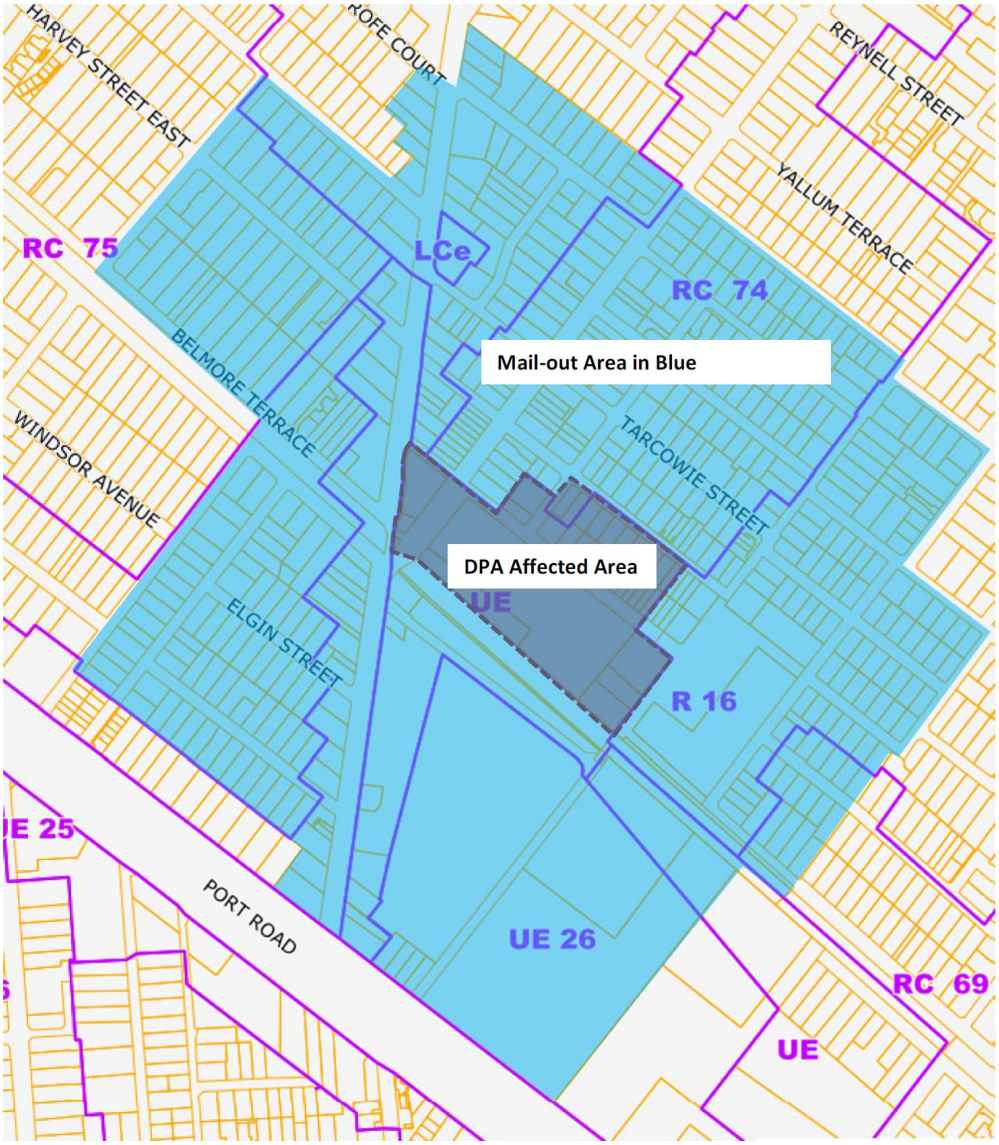


Figure 1: Extent of Mail-out to Owners and Occupants

Public and Agency Submissions

Public Submissions

Sixty nine (69) public submissions were received. Key issues raised in the submissions are summarised as follows:

(a) The draft DPA provided for too much density within the affected area with potential capacity for 500 dwellings. Concerns with this related principally to the impacts of traffic within the local road network. A reduced intensity across the site was sought which did not impact on the local street network.

(b) The draft DPA provided for too much building height with concerns about the impact with the established character of the neighbourhood (as well as facilitating the density / yield). The concern also related to the scale and visual appearance of taller buildings in this location. Suggestions included limiting heights to 3 storeys and reducing heights to 1 or 2 storeys at the periphery adjacent existing neighbourhood.

(c) Concerns of additional vehicles on the local road network, including additional truck movements from commercial development, and the difficulty this will create given the narrow widths and existing reliance on on-street parking for existing dwellings in surrounding streets (through concerns with potential lack of off-street parking from future development). Concerns also related to the accuracy of the assumptions for the distribution of traffic within the traffic investigations noting movements and rat-running occurs beyond what was suggested.

(d) Lack of public open space provision provided within the site with additional reliance placed on MJ McInerney Reserve which is already very popular and busy at times. Submissions sought greater public open space included in the draft DPA affected area.

(e) Concerns relating to higher residential density residential development may pose on existing significant industry known as Visy Glass (at the time of consultation it was known as OI Glass) manufacturing facility and adjacent allied warehouse and distribution centre. Concerns related specifically to conflict in land uses not being suitable and supported by strategic planning, inability to manage air and noise emissions, and the likely increase in complaints impacting operations and ongoing costs for OI Glass.

(f) Concerns about the ability for infrastructure to handle the additional demands and capacities from new residential development, including additional stormwater from increased impervious areas, with a desire to include requirements for WSUD and rainwater tanks for development.

A report on each submission (summary, comments, and action taken in response to each submission) is included in ***Attachment A*****.**

Agency Submissions

Seven (7) responses were received from agencies. There was either general support or no specific comments from agencies and neighbouring Councils. Key issues raised in the responses are summarised as follows:

(a) land within the draft DPA interfacing with the railway should support the provision of the Outer Harbour Greenway route;

(b) the draft DPA should consider safe access for evacuation for flooding from the site in a flood event and stormwater management for peak flow rates on pre and post development so as not to exacerbate flooding;

(c) better identify the function and how development should address the proposed plaza space;

(d) proposals within future development should include the provision of new public open space and WSUD infrastructure to contribute to the increase in tree canopy sought by the 30 Year Plan for Greater Adelaide.

Review of Submissions and Public Meeting

Copies of all submissions were made available for public review from Wednesday 15 April 2020 to 18 May 2020 on the Council website and at the Council offices.

Fourteen submitters requested in writing to be heard, and therefore a public meeting was held on 18 May 2020. The meeting was also held digitally through teleconferencing facilities, due to the Covid-19 pandemic restrictions. People participated online where available, with only a few attending the meeting in person. Of those expressing a desire to be heard, nine attended and spoke at the meeting, and two additional people came forward and made a verbal presentation.

Additional Matters and Investigations

The following additional investigations were conducted after the consultation process to inform the review of submissions and the preparation of further policy amendments to the draft DPA:

(a) Further assessment of the desired building heights across the affected area, responding to the community's concerns. This included reducing the heights overall , as well as reducing heights at the interface with the Historic Conservation Area along section of Pinda Street and Mundulla Street;

(b) Further assessment of the traffic impacts from development having regard to community comments relating to rat-running and assumptions relating to distribution of traffic within the GTA assessment, as well as aligning volumes to the maximum 1500 vehicles per day as identified by Council's Transport Strategy for streets of a local function (in response to community concerns relating to volumes);

(c) Further examination of the potential desired maximum yield for the site having regard to the revised traffic conditions sought within the local streets. This included the mix and size of retail and commercial facilities, as well as dwelling numbers across the affected area.

(d) Consideration for inclusion of additional public open space within the site, having regard to feedback received in the submissions.

(e) Further consideration to strengthen interface policy to address concerns received through the submissions on the potential impacts to the on-going operations of the adjacent licenced activity.

Additional advice was sought with the Environment Protection Authority (EPA) specifically in response to the issues raised by Visy Glass within their submission. Council sought to seek confirmation of the suitability of the methodology, assumptions and recommendations within the technical air emission and noise assessment investigations supporting the draft DPA that were challenged in the submission to confirm from the EPA that the assertions relating to licence limitations and additional conditions as a result of the draft DPA were correct and, in particular, the EPA's position on this matter.

The EPA's confirmation of the suitability of the investigations undertaken, the policy response proposed and that the draft DPA is not considered to impact the licence of OI has provided confidence to Council of the suitability of the policy direction for the draft DPA.

(f) Further clarification of the ability to integrate the potential amendments into the Planning and Design Code so that important local policy is not lost. This included the ability to introduce a Concept Plan Map for this location (which had previously not been advised as an option during the investigations for the draft DPA).

A copy of the additional GTA Traffic Assessment and further advice from the Environment Protection Authority is provided in ***Attachment F***

Timeframe Report

Delay(s) occurred because:

(a) the complexity of some of the investigations, particularly the assessment of noise and the implications of the interface. This included engagement with Visy Glass as part of the Investigation.

(b) the number and complexity of issues raised as a result of the consultation process. This required further examination of the desired development intent and potential yields within the affected area.

(c) additional investigations undertaken to inform the traffic impacts and potential revised yields in response to the community concerns.

(d) negotiations with the proponent in relation to agreement of additional costs associated with additional investigations and work involved in finalising the draft DPA.

CEO's Certification

The consultation process has been conducted and the final amendment prepared in accordance with the requirements of the Act and Regulations as confirmed by the CEO's Certifications provided in ***Attachment D*** (Schedule 4A Certificate) and ***Attachment E*** (Schedule 4B Certificate).

Summary of Recommended Changes to the Amendment following Consultation

The following is a summary of the changes recommended to the draft DPA following consultation and in response to public submissions and/or agency comments:

(a) revised desired character statement and insert of new PDC addressing densities sought for the different parts of the zone at Kilkenny (150 dwellings per hectare for the land south of Pinda Street and east of Wilpena Terrace and 70 dwellings per hectare for other areas)

(b) revised desired character statement and adapted existing PDC to express revised building heights applying across the zone at Kilkenny (reflecting maximum height of 4 storeys, plus reduced maximums at other locations across the zone)

(c) revising the desired character statement to add additional direction for the scale and function of non-residential development at Kilkenny

(d) revised desired character statement and insertion of an additional PDC referencing the Sound Exposure Category Levels and new Concept Plan Map showing these across the site

(e) revised the desired character statement and PDC to reflect the desire to provide additional public open space as an expansion of MJ McInerney Reserve, and referencing the new Concept Plan Map

(f) revise desired character statement and PDC to include reference to public parks and public plaza

(g) Adapt PDC 7 to better express desired forms of development and mixture of uses across the zone at Kilkenny

(h) Adapt PDC 10 table to reflect the reduced shop and commercial floor space areas desired at Kilkenny

(i) insertion of a new Concept Plan Map ChSt/32 – Suburban Activity Node Zone Kilkenny.

Attachment A – Summary and Response to Public Submissions

Report on each public submission received (including summary, comments and action taken in response)

Sub No.	Name/Address	Submission Summary	Comment	Council Response
1.	Rebecca Gurr 6 Cavendish Street, West Croydon	*1.1 Concerns raised that the development will provide no additional greenspace and will place pressure on the MJ McInerney Reserve.*	1.1 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Draft policy amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider	1.1 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			existing Development Plan policy as well as the proposed draft policy.	
		1.2 Concerns raised over the increase in traffic of over 400% on the adjacent streets by the draft DPA in the local area which will cause traffic congestion at both peak and non-peak times.	1.2 While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal).	1.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		1.3 Concerns regarding the requirement for sufficient car parking to address impacts experienced from existing on-street visitor parking.	1.3 The issue of car parking is acknowledged as a common issue experienced within established residential areas. The Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. The existing provisions were reflected in the draft DPA investigations under Section 3.2.5, Car Parking. The intent is to retain the same car parking standard that applies to the balance of the City for residential land uses. The requirements for detached dwellings and semi-detached dwellings seek a minimum of 2 spaces on site. For other dwelling types such a row-dwellings, group dwellings and residential flat dwellings the rate is reflective of the development's proximity to a district centre and public transport options, including high frequency services. These standards are higher, for instance, than what is applied for residential development within the Bowden (RSA) development, which envisages 0.75 spaces per dwelling. This is because the zoning for the Bowden development is in a designated area which anticipates a lesser residential parking	1.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			provision. The draft DPA does not propose a zone which will trigger a lesser off-street parking provision for residential development. During the review of submissions, advice was also sought from the Department of Planning which indicated that any potential amendments to the draft DPA to increase car parking ratios beyond the existing policy would need to be consistent with the State Government's Planning and Design Code (Code). The intent of the Code is to provide policy uniformity across Metropolitan Adelaide, including off-street car parking standards. While the policy in the Code is generally consistent with policy in the Charles Sturt Council Development Plan, it does provide a higher ratio expectation for certain developments such as group dwellings and residential flat buildings which propose 3-bedroom designs. Should the draft DPA be authorised future development would be bound by this policy in the Code. While a greater ratio of off-street car parking cannot be considered as part of this draft DPA, policy amendments are proposed to reduce the overall desired dwelling yield from what was originally consulted (ie from around 500 dwellings to 300 dwellings). The	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			proposed reduction in yield seeks to address issues raised in the submissions on matters regarding potential traffic congestion but also indirectly addresses the concerns relating to car parking. Policy also exists in the Development Plan to address on-street visitor parking, contained in the Land Division module of the General Section, which seeks that land division proposals should provide sufficient space for on-street visitor car parking (*at least one on-street visitor car parking space being provided for every two residential allotments*). The assessment of suitability of on-street car parking and off-street car parking would occur at a development assessment stage, which follows the draft DPA process.	
		1.4 Concerns raised with regards to property values of surrounding houses will decrease due to the Affordable Housing Overlay.	1.4 The desire for affordable housing opportunities within the established metropolitan area is in line with the Council's Community Plan to provide an urban environment that is adaptive to a changing and growing City. The issue of affordable housing is also an important direction in the State Government's Strategic Plan, and the South Australian Planning Strategy (the 30-Year Plan). Government's at all levels have a social obligation to ensure all household types can	1.4 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			be provided with opportunities to be located in areas close to public transport and other services and offer an integrated housing mix to cater for the varied needs of the community. The Affordable Housing Overlay policies are not unique to this draft DPA and already exist in the Charles Sturt Development Plan. These policies have been consistently applied to all new major rezoning development proposals across the City, which seek an increase in dwelling yield. These policies provide guidance for the provision of affordable housing for developments that comprise more than 20 dwellings which is likely to be the case for the proposed draft DPA Affected Area. Courts have consistently confirmed that the effect on property values is not a direct valid planning issue. There are many elements of a non-planning nature that would influence value.	
2.	Dean Earle 59 Harvey Street, Woodville Park	*2.1 Seeking a maximum two-storey built form.*	2.1 The proposed height limits seek to achieve reasonable development yields and a mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services.	2.1 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Following submissions received proposed amendments to building heights is proposed in the draft DPA including: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), west of Arkaba Road (north side of Pinda Street) and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace (a reduction from proposed maximum of five storeys as originally consulted as part of the draft DPA. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five storeys as originally consulted as part of the draft DPA. The proposed reduction in built form is considered appropriate to further improve the	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			transition between the draft DPA Affected Area and the adjacent residential area. The reduction in built form adjacent to the railway line is also considered appropriate to improve the interface with the adjacent non-residential land uses located south of the railway line.	
		2.2 Concerns raised regarding insufficient green space.	2.2 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Draft policy amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider	2.2 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			existing Development Plan policy as well as the proposed draft policy. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments "above ground". The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees.	
		2.3 Concerns raised with potential for an increase in traffic.	2.3 While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged.	2.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA, the wider local road network and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with Council's Transport Strategy for local roads such as those within this location. On this basis the revised policy scenario presents a reduced impact on the local road	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		2.4 Concerns raised with overpopulating the area.	2.4 Locational factors for higher densities (eg inner city, close to public transport and services) are major factors influencing density/housing options for the affected area within the draft DPA. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017). The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised	2.4 Amend the draft DPA policy relating to desired dwelling yield to address concerns raised through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			through the submissions received on the impacts from potential traffic on the local road network.	
		2.5 Seeking a door to door survey to seek views from the community on the draft DPA.	2.5 The draft DPA underwent a comprehensive statutory consultation process for eight weeks. The consultation process involved a mailout of 868 letters to property owners and occupants within and adjacent to the draft DPA Affected Area with an accompanying information brochure, seeking their input. The consultation process also involved: • A Government Gazette notice and formal notices in the Advertiser and Messenger newspapers. • A 'yoursay' web page with information brochure, link to the draft DPA, the ability to ask questions and an online submission option accessed through Council's web site. • Hard copies of the draft DPA and information brochures provided at all Council libraries and the Civic Centre as well as a display board at the Civic Centre. There were 405 'unique visitors' on the 'yoursay' web page during the course of the consultation period. Forty-seven (47) submissions were lodged directly on the site	2.5 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			and 38 visitors have subscribed to follow the project. A community briefing session was also arranged by Kilkenny residents on 3 March 2020 at the Kilkenny Community Centre and was attended by Council staff by invitation. Council staff outlined key aspects of the draft DPA policy and answered questions to assist informing the community in preparation of their submissions on the draft DPA.	
3.	Victor Sebastiao 11 Shirley Avenue, Croydon Park	*3.1 Raised concerns with multi-storey medium to high density living in the area and should be limited to two-storey built form.*	3.1 Refer to comments in row 2.1.	3.1 Refer to response in row 2.1.
		3.2 *Seeking the area is rehabilitated for future home owners to grow their own produce in a safe manner.*	3.2 Concerns in relation to contamination and future remediation are noted. The draft DPA environmental investigations identifies that in 2004 a site contamination investigation was undertaken for the former Bianco site by Adelaide Environmental Consulting. The investigation identified potentially contaminating activities that had been undertaken at the site and it is considered likely that there is a level of site contamination present. A further visual assessment was undertaken in 2015. The draft DPA includes policy in the Zone Desired Character statement for the Suburban Activity Node Zone to address the need for	3.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			remediation to be undertaken. The Charles Sturt Development Plan also contains existing policy in the General Section to ensure site contamination matters are assessed in any future development applications. The drat DPA has also been reviewed by the Environment Protection Authority (EPA). The Agency has confirmed in their submission that site contamination issues have been suitably addressed through the draft DPA policy. Future remediation process to ensure the land is suitable for its intended land use would occur at a development application stage, which would follow this draft DPA should it be endorsed by Council and ultimately authorised by the Minister for Planning.	
4.	Toni Simpson 71 Alfred Road, West Croydon	*Supports a redevelopment of the former Bianco site but the following concerns:* *4.1 Concerned with 5 storey dwellings along the railway line and the high number of dwellings proposed.* *Concerned that the potential for the Kilkenny population to double in size without any known plans to upgrade the current infrastructure.* *Raised concerns regarding increased traffic congestion on streets that are*	4.1 The concerns raised in the submissions regarding built form, population increase and traffic issues are noted. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed	4.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		already overcrowded with on-street parking. *Raised an issue that Alfred Road is already utilised as a thoroughfare to by-pass the David Terrace/Kilkenny Road train line to use the underpass in Rosetta Street.*	likely development scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network as well as reduce the proposed building height. As a result of the traffic issues raised through the consultation process additional investigations were undertaken based on reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space. A revised yield has been supported by a revised TIA to understand the anticipated traffic volumes and impacts to the surround local road network based on a reduced dwelling yield of around 300 dwellings and a reduction in potential commercial and retail floor area. The revised TIA has concluded that:	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
5.	Matt Lazarus 2/195 Military Road, Henley Beach South	5.1 *Supports the draft DPA and opportunity for young families to move into an area close to the City*.	5.2 Support for the draft DAP is noted.	5.2 No amendments proposed to the draft DPA.
6.	Shannon Linke 22 Burke Street, West Croydon	*6.1 Concerns raised that the increased population won't be accommodated by the small footprint of the DPA area.*	6.1 The concerns raised in the submission regarding population increase is noted.	6.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network as well as reduce the proposed building height.	address the traffic impact concerns received through the consultation process.
		6.2 Concerns raised over the pressure placed on existing infrastructure such as stormwater and sewer with the predicted increase in population.	6.2 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to	6.2 Amend the draft DPA policy relating to building heights, anticipated dwelling yield (based on desired density) and commercial/retail floor area to address the traffic

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network as well as reduce the proposed building height.	impact concerns received through the consultation process.
		6.3 Concerns raised regarding traffic congestion on narrow surrounding streets and increased demand for on-street parking.	6.3 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised	6.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		6.4 Seeking the provision of public open space be applied to the area and not rely on the adjacent park as open.	6.4 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other	6.4 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		6.5 Raised concerns regarding rainwater mitigation and how it will be addressed from the increased roof area.	6.5 Concerns are noted. In terms of rainwater mitigation, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the	6.5 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			assessment of a development application. The zone policy in the draft DPA also addresses the need for future development to incorporate Water Sensitive Urban Design systems. No additional policy amendments in relation to stormwater management are considered necessary in the draft DPA.	
		6.6 Sought clarification behind the existing off-street car parking provision in relation to 1.25 spaces per dwelling proposed for off-street parking.	6.6 Refer to comments in Row 1.3.	6.6 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		6.7 Sought information on building design / preliminary building plans available to provide detail on the proposed off and on street parking?	6.7 The draft DPA process seeks to consider the suitability of rezoning the affected area in order to facilitate future mixed-use development including residential development. The detail of future land division and/or buildings designs are dealt with as part of future development proposals and therefore do not form art of the draft DPA process.	6.7 No further amendments proposed to the draft DPA.
		6.8 Querying the energy rating of new buildings as new rules came into effect as of March.	6.8 Council's Development Plan contains existing policies in the General Section, relation to Energy Efficiency matters. The policies seek development through design at a planning assessment stage to provide for efficient solar	6.8 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			access to buildings and open space, consideration of siting of buildings to allow open spaces associated with the main activity areas face north for exposure to winter sun and ensure design considers adequate natural light and winter sunlight is available to the main activity areas of adjacent buildings. The policies also encourage roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells. The design of buildings to improve energy efficiency will also resonate through future policy under the Government's pending State-wide Planning and Design Code. The energy efficiency of future development is also considered at the building assessment stage through energy efficiency performance requirements for new buildings under the National Construction Code. This matter is dealt with appropriately at a future development assessment stage and no additional policy amendments are considered warranted in the draft DPA.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		6.9 Raise concerns that the maximum 5 storey building height is too high for this location as surrounding homes are two-storey maximum. This building height would also limit sunlight to the park.	6.9 Policy addressing building siting and design, building envelopes and staggered setbacks are well articulated in the Development Plan to ensure interface, bulk and scale, design and overshadowing impacts are minimal. To address concerns raised, the maximum 5 storey building height (south of Pinda Street) as proposed in the consultation version of the draft DPA is proposed to be amended to a maximum of 4 storeys maximum for buildings located south of Pinda Street and a maximum of 3 storeys adjacent to the existing Local Heritage Place (also south of Pinda Street) and north of Pinda Street with the remaining portion of the affected area which interfaces the existing Residential Character Zone proposed at a maximum of 2 storeys. The policy amendments proposed therefore seek a further graduation of building height profile scaling down towards the interface with the neighbouring Residential Character Zone.	6.9 Amend the draft DPA policy relating to building heights, to address concerns received through the consultation process.
		6.10 Raised concerns that the proposed commercial retail uses would contribute to congestion in the surrounding narrow street network.	6.10 Given the traffic concerns raised through a number of the submissions received, associated with commercial floor area the potential retail scale has been reduced to 250m^2 and commercial to 1000m2. The reduced floor areas have been reviewed through the revised TIA which has concluded that with the reduced residential yield there is adequate capacity in the surrounding local	6.10 Amend the draft DPA policy relating to commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			road network to cater for the additional traffic based on the amended policy.	
		6.11 *The submitter proposed two alternative redevelopment suggestions:* • *A smaller scale apartment development of a maximum of three storeys with the inclusion of ample greenways and small retail uses in the existing heritage structure.* • *Subdivide into residential blocks for the development of housing that suits the residential character guidelines of the area.*	6.11 The suggestions are noted. Amendments are proposed in the draft DPA policy to address concerns raised through the submissions e.g. reduced building heights, residential yield, retail floor area and policy seeking greater level of public open space similar to these submitter's concepts.	6.11 Amend the draft DPA, to address the desire for additional public open space and amend draft policy to reflect the proposed reduction in building heights and desired yield.
7.	Ricky Charles 4 Burke Street, West Croydon	*7.1 Supports a redevelopment of the former Bianco site into a residential use however concerns raised in relation the potential residential yield.*	7.1 The concerns raised in the submissions regarding the proposed yield is acknowledged. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings and concluded that existing infrastructure such	7.1 Amend the draft DPA policy relating to anticipated dwelling yield and commercial/retail floor area to address concerns raised such as traffic impacts received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network.	
		7.2 Concerns raised that MJ McInerney Reserve is currently a very busy park and will not be able to accommodate another 500+ people.	7.2 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location).	7.2 Amend the draft DPA, to address the desire for additional public open space.

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			This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		7.3 Concerns raised regarding increased traffic.	7.3 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in	7.3 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		7.4 Concerns raised over the appearance of multi-storey development.	7.4 Policy addressing building siting and design, building envelopes and staggered setbacks are well articulated in the Development Plan to ensure interface, bulk and scale and overshadowing impacts are minimised. The assessment of future development proposals is not subject to this draft DPA but will be subject to the development assessment process when individual development applications are lodged in the future to address any design and appearance issues. In terms of building heights, the maximum 5 storey building height (south of Pinda Street) as which was proposed in the consultation version of the draft DPA is proposed to be amended to address concerns raised through the submissions received to 4 storeys maximum for buildings located south of Pinda Street and a maximum of 3 storeys adjacent to the existing Local Heritage Place (also south of Pinda Street) and north of Pinda Street with the	7.4 Amend the draft DPA policy relating to building heights, to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			remaining portion of the affected area which interfaces the existing residential area proposed at a maximum of 2 storeys. The policy amendments proposed in the draft DPA therefore seek a further graduation of building height profile whereby building height and densities are to scale down towards the interfaces of the neighbouring residential areas.	
8.	Maween Malheson 9 Castle Street, West Croydon	*8.1 Opposes the proposal as the scale/size of the multi-story development is unreasonable.*	8.1 The concerns raised in the submissions regarding the proposed scale and size is acknowledged. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the	8.1 Amend the draft DPA policy relating to building heights and yield to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			potential yield from 500 to around 300 dwellings and reduced building heights. The policy amendments proposed in the draft DPA therefore seek a further graduation of building height profile whereby building height and densities are to scale down towards the interfaces of the neighbouring residential areas.	
9.	Shirley and Lindsay Cullinan 90 Harvey Street East, Woodville Park	*9.1 Raises several concerns regarding the potential increase in traffic and parking the proposal may create, specifically:* • *New residents may take-up existing on-street parking and playground parking around the McInerney Reserve.* • *New residents will create additional traffic on David Terrace/Kilkenny Road which can become quite congested at certain times.* • *Harvey Street on weekends is already busy with cars parked on both sides of the street due to people attending the temple on David Terrace or the garden shop on the corner.*	9.1 Concerns around car parking is noted and acknowledged as a common issue experienced within established residential areas. Refer to comments in Row 1.3. In relation to potential impacts to David Terrace / Kilkenny Road, no issues were raised through the Department of Infrastructure and Transport (DIT) in their submission. The draft DPA traffic investigations indicated that David Terrace currently carries around 19,900 vehicles per day, while the potential development could generate in the order of 2,760 vehicle trips per day that are anticipated to use David Terrace the analysis indicated the traffic generation associated with the potential development of the affected area will be able to be catered for within the road network. While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is	9.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield (based on desired density) and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			adequate capacity in the surrounding local road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. As a result of the traffic issues raised through the consultation process additional investigations were undertaken based on reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space. A revised TIA was undertaken to understand the anticipated traffic volumes and impacts to the surround local road network based on a reduced dwelling yield of around 300 dwellings and a reduction in potential commercial and retail floor area. The revised TIA has concluded that: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day,	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
10.	Nogol Salehi 15 Tarcowie Street, Kilkenny	*10.1 Supports the redevelopment of the Bianco site into a mixed-use development but raises concerns in relation to the impact on the existing traffic and parking in the area based on the proposed yield.* *Recommends that each dwelling have 1 carpark as a minimum and 2 car parks for any dwelling that has more than one bedroom.*	10.1 Concerns around car parking is noted and acknowledged as a common issue experienced within established residential areas. Refer to comments in 1.3. While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding local road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights,	10.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield (based on desired density) and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			the surrounding road network to cater for the additional traffic based on the amended policy.	
11.	Sean Healy 20 Yallum Terrace, Kilkenny Bronwyn Loechel 15 Elizabeth Street, Croydon	*11.1 Concerns raised on the potential traffic congestion in the local street network surrounding the development.*	11.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic	11.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		11.2 Proposed re-routing Aroona Rd underneath the railway line to connect with Port Road to alleviate pressure on the streets north of the development site.	11.2 The proposal to re-routing Aroona Road underneath the railway line to connect with Port Road is unlikely to be a feasible option to address the scale of traffic envisaged. As detailed in Row 11.1 a revised TIA based on a reduce yield has been undertaken. The findings demonstrate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity in the surrounding local road network to cater for the additional traffic based on the amended policy.	11.2 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		11.3 Concerns that the proposed 5-storey development will have a significant aesthetic impact upon the surrounding heritage area and suggests that a 3-storey development would be more suitable.	11.3 Refer to comments in Row 2.1.	11.3 Amend the draft DPA policy relating to building heights, to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
13.		*13.1 Concerns raised about the increase in pollution and heat due to the increased traffic that the proposal will create as well as the disruption to the local environment/amenity by the increased noise and activity.* *Suggestions made to offset the raised issues by completing the street tree planting that was started during drought season. Advised that street tree planting will be important as the proposal will not contain adequate additional green space to balance the increased population it will create.* *Consideration should be made to ensure there is trees and vegetation to shade the greenway continuing through the subject site.*	13.1 The additional vehicular activity generated by the new development is unlikely to significantly increase pollution and impair air quality of the locality when considering the volume and nature of existing vehicle movements along Kilkenny Road / David Terrace and Port Road. The consideration of completing street tree planting within the locality is noted and should be pursued through Council's Open Space Unit as it is outside the scope of this draft DPA. In terms of public open space policy amendments are proposed for additional public open space in the draft DPA. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides	13.1 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			provide opportunity for trees and smaller vegetation to be planted. The detailed design of the public open space is however not a matter that the draft DPA can address (other than the desired approximate location and size). This ordinarily occurs at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			new roads are proposed to provide wide footpaths for sufficient space for street trees.	
14.	Chris Matty 7 Wilpena Terrace, Kilkenny	*14.1 Opposes the rezoning as parking on the adjacent streets is already quite limited and the addition of a large-scale housing complex will only congest these streets further.*	14.1 Concerns around car parking is noted and acknowledged as a common issue experienced within established residential areas. Refer to comments in Row 1.3. While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding local road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development	14.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield (based on desired density) and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
15.	Eugene and Vera Melnitchouk 20 Tarcowie Street, Kilkenny	15.1 *Supports the draft DPA rezoning to rejuvenate the dilapidated, graffiti covered site that has been a dreadful eye sore for many years to increase safety of the area.*	15.1 Support for the draft DPA and associated policies are noted.	15.1 No further amendments proposed to the draft DPA.
		15.2 Indicated it is an opportunity to provide much needed homes for families within close proximity to the city.	15.2 Comments noted. The draft DPA envisages a variety of dwelling types to cater for the needs of different households in close proximity to	15.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			public transport services, other services and the City.	
16.	Jean Chinca 13a Yallum Terrace, Kilkenny	16.1 *Indicates supports for the former Bianco site being developed but concerns with building heights and density.* *Considers the 5-storey built form is too high for the area and the proposed 500 dwellings will create overcrowded conditions. Suggests a 3-storey development is far more acceptable.*	16.1 Support for a form of redevelopment of the former Bianco site but concerns raised in the submissions regarding built form and density are acknowledged. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network as well as reduce the proposed building height. As a result of the traffic issues raised through the consultation process additional investigations were undertaken based on	16.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space. A revised yield has been supported by a revised traffic impact assessment to understand the anticipated traffic volumes and impacts to the surround local road network based on a reduced dwelling yield of around 300 dwellings and a reduction in potential commercial and retail floor area. The revised assessment has concluded that: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		16.2 Concerns raised regarding overlooking into existing properties from top storey windows.	16.2 Overlooking and privacy issues are addressed through building design and screening techniques that are well articulated in the existing Development Plan policies within the General Section and in the Desired Character statement policy within the proposed zone. This issue is assessed at the development application stage.	16.2 No further amendments proposed to the draft DPA.
		16.3 Seeking gardens area for development to plant trees.	16.3 Noted and agreed. With respect to green space, the Charles Sturt Council Development Plan contains existing policy in the General Section of the Plan, which seeks residential development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”.	16.3 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		16.4 Raised concerns regarding utility services such as gas and electricity indicating that supply issues in the area need to be considered as the representor has experienced a reduction in electricity at times.	16.4 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage.	16.4 No further amendments proposed to the draft DPA.
		16.5 Concerns raised that the narrow streets of Kilkenny will become unsafe with extra vehicles parked within the on-street spaces. Suggestion made to convert certain streets to one-way with on-street parking on one side of the street. In addition, limited time parking for signed 'residential parking only' spaces could be introduced.	16.5 Concerns around car parking is noted and acknowledged as a common issue experienced within established residential areas. Refer to comments in Row 1.3. Suggestions regarding one-way street designs and/or limited time parking are beyond the scope of the draft DPA.	16.5 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		16.6 Concerns raised on the anticipated volume of traffic and congestion along	16.6 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A	16.6 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		the local road network and arterial roads.	revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in	commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			the surrounding road network to cater for the additional traffic based on the amended policy.	
		16.7 Raised concerns around development providing for visitor car parking.	16.7 Refer to comments in Row 1.3,	16.7 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		16.8 Concerns raised regarding waste collection trucks already having difficulty getting down the narrow streets when cars are parked on both sides of the street. *Also raised concerns regarding emergency service vehicles that may find it difficult to access any house in the adjacent streets if these streets are full with parked cars.*	16.8 Refer to response in Row 16.7 regarding the provision of off-street parking. Further, any new development involving a new road system within the draft DPA affected area will require through existing policies its design to provide width that can provide for the safe and convenient movement and parking of projected volumes and allow the efficient movement of services and emergency vehicles. As part of the consultation of the draft DPA the Metropolitan Fire Services and State Emergency Services were also consulted.	16.8 No amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		16.9 Indicated that rainwater tanks must be installed for each proposed dwelling and stormwater storage areas implemented to conserve water that could be used to water green areas. Water should be saved and recycled wherever possible.	16.9 In terms of rainwater mitigation, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks. The zone policy in the draft DPA also addresses the need for future development to incorporate Water Sensitive Urban Design systems. No additional policy amendments in relation to stormwater management are considered necessary in the draft DPA.	16.9 No further amendments proposed to the draft DPA.
		16.10 Seeking more green areas that incorporate trees to reduce the 'heat island effect.	16.10 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public	16.10 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The desired greenway and additional public open space will provide opportunity for trees and smaller vegetation to be planted. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		16.11 Seeking future development to reflect existing materiality and built form of the Kilkenny historical area. *Concerns that recent trends of dark grey or black bricks and roofs will*	16.11 The existing Development Plan does not contain policy that requires development proposals in a zone adjacent to the Residential Character Zone to compliment the style or finishes of this zone. This is not typical just for the draft DPA affected area.	16.11 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		absorb heat and make the dwellings 'hot boxes' to live in.	The draft DPA affected area does (as identified during the consultation) contain two allotments that are already located in the Historic Conservation Area. Notwithstanding a proposed new zoning, development over these sites will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exists in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. Council's Development Plan contains energy efficiency policy in the General Section. While the policy stops short of desired finishes the policy does desire development be appropriately sited and designed to maximise north facing sun, and roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		16.12 Queried as to how the existing heritage listed buildings in the area would be protected from damage during the construction phase?	16.12 While Council can control that a development is built in accordance with the approved plans the protection of adjacent buildings during construction is the responsibility of the developer.	16.13 No further amendments proposed to the draft DPA.
		16.13 *Not wishing to see a large shopping complex and consider a café and restaurant appropriate as part of the mixed-use component of the draft DPA.*	16.13 The draft DPA policy seeks uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes.	16.13 Amend the draft DPA policy to reduce desired commercial/retail floor areas.
		16.14 Seeking more parking spaces such as parking bays along MJ McInerney Reserve.	16.14 Comments noted. Off street and on-street car parking as part of the draft DPA has been discussed in Rows 16.5 and 16.7. Consideration of additional parking areas around the existing reserve is outside the scope of this draft DPA.	16.14 No further amendments proposed to the draft DPA.
		16.15 Indicated that the existing Community Centre on Wilpena Terrace will need to be extended/include more facilities to accommodate the increased number of residents in the area.	16.15 Upgrading community services in the area are subject to Council's on-going review, prioritisation and budgeting processes. While the draft DPA investigations concluded that the affected area is well serviced by a range of community uses, the draft DPA facilitates a range of non-residential community land uses which serve the local population. This is reflected in the draft policy.	16.15 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
17.	Gino Chinca 13a Yallum Terrace, Kilkenny	*17.1 Indicated support for the area to be utilised but objects to the proposed heights and density. Seeking a maximum of 3 storeys.*	17.1 Concerns raised in the submissions regarding built form and density are acknowledged. In light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network as well as reduce the proposed building height. To address concerns raised, the maximum 5 storey building height (south of Pinda Street) as proposed in the consultation version of the draft DPA is proposed to be amended to a maximum of 4 storeys maximum for buildings located south of Pinda Street and a maximum of 3 storeys adjacent to the existing Local Heritage Place (also south of Pinda Street) and north of Pinda Street with the remaining portion of the affected area which interfaces the existing Residential Character Zone proposed at a maximum of 2 storeys. The policy amendments proposed therefore seek a further graduation of building height profile scaling down towards the interface with the neighbouring Residential Character Zone.	17.1 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		17.2 Indicated concerns with the potential in increase in traffic congestion in surrounding narrow street network.	17.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area.	17.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		17.2 Raised the issues of limited on-street parking currently in the area. Indicated that present residents should be considered for on-street parking as many houses in the area are single fronted and don't have a driveway for off-street parking.	17.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	17.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		17.4 Questioned whether the surrounding schools would cope with the extra number of children that are likely to enrol that may live in the new development?	17.4 Through the investigations the draft DPA concluded that the affected area is well serviced by a range of community uses including schools within a 2.0-kilometre radius of the draft DPA Affected Area. The demand on public schools is a State Government matter and its response to upgrades would be based on current and future likely demand for services. The	17.4 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the draft DPA. No submission was received by the Department.	
		17.5 Concerns raised regarding the capacity of the existing essential services to accommodate the proposal e.g. electricity, gas, sewage, deep drainage, waste management.	17.5 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage. Further, any new development in addition to development involving a new road system within the draft DPA affected area will require through existing policies the design of driveway crossovers, parking areas, accessways and elements that interact with the public realm should safely and efficiently accommodate the collection of waste and recycling materials as well as roads to be designed of a width that can provide for the safe and convenient movement and parking of projected volumes	17.5 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			and allow the efficient movement of services and emergency vehicles.	
		17.6 Indicated that Council should consider increasing the amount of facilities within the MJ McInerney Reserve such as extra parking, BBQ's, seating and toilets to accommodate the anticipated influx of people in the area.	17.6 The MJ McInerney Reserve was recently significantly updated to respond to higher order recreation provisions. Further upgrades would be dependent on the level of increased future demand.	17.6 No amendments proposed to the draft DPA.
		17.7 Indicated the unsuccessful track record of the various types of shops that have attempted to establish themselves in the local area and considers the proposed new shops within the mixed-use development would not survive partly due to competition with the nearby shopping centres.	17.7 The local focussed shops envisaged within the draft DPA site is not intended to parallel the scale or function of the larger shopping centres within the locality. The draft DPA policy seeks uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes.	17.7 Amend the draft DPA policy to reduce desired commercial/retail floor areas.
		17.8 Queried whether the State Government would provide more trains to cater for the anticipated new residents of Kilkenny?	17.8 The provision for additional train services to cater for the increase in commuter trips by new residents is a State Government public transport issue and would likely be based on an assessment of future demand for this service. The Department of Planning, Transport and Infrastructure were consulted as part of the draft DPA consultation process.	17.7 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The Department's submission did not indicate the potential for increased services at this stage, however raised the potential for future changes to the station and indicated support for the draft DPA to facilitate the protection of land in the affected area interfacing the railway station with the desired location for the Outer Harbor Greenway route.	
18.	Pamela Thackray 73 Wilpena Terrace, Kilkenny	*18.1 Supports a redevelopment of the former Bianco site however has concerns with regards to the potential for 5-storey buildings and 3-storeys should be limited.*	18.1 Refer to comments in Row 2.1.	18.1 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.
		18.2 Concerns with the increase in traffic and considers it unacceptable as the existing congestion of the current traffic levels won't cope, especially along David Terrace. Considers future plans for a railway overpass should be considered.	18.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development	18.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. With regards to a potential overpass suggestion, as detailed above, based on a reduce yield the findings demonstrate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity in the surrounding local road network to cater for the additional traffic based on the amended policy.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		18.3 Indicated that traffic lights would be needed at the Wilpena Terrace and Torrens Road intersection.	18.3 The Department of Planning, Transport and Infrastructure were consulted as part of the draft DPA consultation process. Based on the previous investigations, the Department's submission did not indicate the need for a potential traffic light system at the intersection with Wilpena Terrace and Torrens Road. As detailed above based on a reduce yield the findings demonstrate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity in the surrounding local road network to cater for the additional traffic based on the amended policy.	18.3 No further amendments proposed to the draft DPA.
		18.4 Concerned with increase in delivery vehicles with retail proposed.	18.4 Concerns with the increase of delivery vehicles with retail proposed is noted. The revised TIA has involved a policy reduction for potential retail and commercial land uses. The reduced floor area has been factored into the revised TIA traffic volumes. The findings demonstrate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity in the surrounding local road network to cater for the additional traffic based on the amended policy.	18.5 Amend the draft DPA policy to reduce desired commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		18.5 *Indicated that train services need to be increased to and from the city to cope with increased commuting needs.*	18.5 The provision for additional train services to cater for the increase in commuter trips by new residents is a State Government public transport issue and would likely be based on an assessment of future demand for this service. The Department of Planning, Transport and Infrastructure were consulted as part of the draft DPA consultation process. The Department's submission did not indicate the potential for increased services at this stage, however raised the potential for future changes to the station and indicated support for the draft DPA to facilitate the protection of land in the affected area interfacing the railway station with the desired location for the Outer Harbor Greenway route.	18.5 No further amendments proposed to the draft DPA.
		18.6 Indicated that the MJ McInerney Reserve is not large enough to cater for the open space recreation needs of the new residents and small green spaces should be included in the development.	18.6 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA	18.6 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
19.	Eugene Lamnek 75 Alfred Road, West Croydon	*19.1 Opposed with the proposed high density living not considered consistent with the surrounding residential areas.*	19.1 The proposed height limits applying to this area have been derived on the basis of a range of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1.	19.1 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone.	
		19.2 Concerns raised with increasing traffic volumes. Indicated that the traffic impact study didn't include the impact on West Croydon area roads such as Alfred Road and Rosetta Street and concerned that Alfred Road will become a major exit/entry route for the new development.	19.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day,	19.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. The revised TIA also provided a revised distribution model to consider the anticipated vehicle movements to the broader local road network including Alfred Road. The findings indicated that 15% of vehicles arriving/departing from the draft DPA affected area is anticipated to use Alfred Road. The increase of traffic volumes on Alfred Road (specifically near the intersection with Rosetta Street) is expected to approach 1,500 vehicles per day, however, a high proportion of the total traffic in this location is existing road users already on the network. The additional traffic volume from the proposed DPA site is considered to be accommodated without a significant negative impact on the wider local road network. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		19.3 Raised concerns that the proposal to waive the standard 12.5% public open space requirement is not consistent with the current body of knowledge on the importance of open space for general wellbeing and mental health (several studies listed). Indicated that the proposed greenway re-alignment and the small plaza are not adequate to mitigate the need for new open space included as part of any future development and recommends additional open space at the north-western end of the development to provide buffering from traffic on David Terrace.	19.3 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider	19.3 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			existing Development Plan policy as well as the proposed draft policy.	
20.	David Arkins 99 Day Terrace, West Croydon	*20.1 Indicated that car parking is already a problem on Day Terrace, especially at school drop off and pick up times.*	20.1 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	20.1 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		20.2 Indicated that since the re-opening of the MJ McInerney Reserve it has become quite overcrowded and carparking has become an issue, often leading to cars parking on both sides of neighbouring streets, particularly on Sackville Street. Indicated that more green space is needed to cope with the additional number of residents.	20.2 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown	20.2 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		20.3 Concerns raised with traffic. Indicated that current traffic issues along David Terrace close to the Kilkenny railway line will exacerbate as enormous pressure will be put on the exit roads to the main arterial roads. Concerned that bottle necks on David Terrace will make drivers use other back streets to get out which will put pressure on the existing narrow streets.	20.3 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal).	20.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
21.	Kip Fuller & Tony Williams 19 Rowell Crescent, West Croydon	*21.1 In principle in favour of changes for rezoning the land. Indicated that the industrial site has been a terrible ugly blight on the Kilkenny neighbourhood.*	21.1 In principle support for the rezoning noted.	21.1 No amendments proposed to the draft DPA.
		21.2 Indicated in favour of the retention of the heritage listed "The Austral Picture Palace" building for a repurposed non-residential commercial use.	21.2 Comments Noted. The building in question is identified as a Local Heritage Place in the Charles Sturt Council Development Plan. The Development Plan contains existing policies to address future development of Local Heritage listed buildings. With regards to future land uses the draft DPA provide flexibility for mixed use purposes. The future proposed use of the building is not within the scope of this draft	21.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			DPA but will be determined by a future development application, if the drat DPA is authorised.	
		21.3 Concerns with the proposed density and building height and considers the proposal is too constrained by the area's limited footprint.	21.3 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, the intent of this and other submissions to review and modify building heights have been considered and resulted in policy amendments to the draft DPA resulting in a lower form. Refer to comments in Row 2.1. The draft density is also proposed to be amended following a revised Traffic Impact Assessment (TIA) undertaken to understand the anticipated traffic volumes and impacts to the immediate and surrounding local road network based on a reduced dwelling yield of around 300 dwellings and a reduction in potential commercial and retail floor area.	21.3 Amend the draft DPA policy relating to building heights, anticipated dwelling yield (based on desired density) and commercial/retail floor area to address concerns received through the consultation process.
		21.4 Opposes the addition of a large commercial and retail areas.	21.4 The draft DPA policy seeks uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses	21.4 Amend the draft DPA policy to reduce desired commercial/retail floor areas and desired location.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			has been amended to also reduce the potential traffic volumes.	
		21.5 Strongly disagrees that there is no need for additional public open space due to the proximity of the MJ McInerney Reserve.	21.5 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	21.5 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		21.6 Raised concerns that during construction it will be highly disruptive for residents as there is widespread concern for the standard of management of asbestos removal, soil contamination remediation, earthworks, traffic movements and noise generated.	21.6 Concerns regarding disruptions during construction and the safe remediation of the land are noted. These are all matters outside the scope of the draft DPA. With regards to future demolition, construction noise, future remediation of the affected area and traffic management during construction, these matters will be dealt with following any future development approvals for proposed land uses in accordance with an approved remediation plan, traffic management plan and the requirements of relevant legislation such as the *Environment Protection Act 1993*.	21.6 No further amendments proposed to the draft DPA.
		21.7 Concerns raised that the modern development will contrast with and detract from the existing character of the older dwellings in the two adjacent suburbs.	21.7 It should be acknowledged that the draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	21.7 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		21.8 The ability of the area's existing essential infrastructure and utilities to cope with the influx of new residents.	21.8 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage.	21.8 No further amendments proposed to the draft DPA.
		21.9 Indicated that there is inadequate off-street parking allocated for occupants of the new dwellings and their visitors, plus, limited parking for staff, customers and deliveries for the commercial and retail areas.	21.9 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. In relation to future commercial land uses the proposed zone will require a minimum of 3 car park spaces for every 100m2 of gross leasable floor area. The draft DPA investigations indicate this ratio is reflective of the proximity	21.9 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			and high accessibility of the proposed zone to frequent public transport. In relation to these land uses the draft DPA proposes a reduction in the desired floor areas from originally consulted 1400m2 for retail and commercial to 250m2 for retail and 1000m2 for commercial to focus on the day to day needs of local residents and address submission concerns to reduce the potential traffic volumes.	
		21.10 Raised concerns regarding emergency and waste collection vehicle access to the site will be constrained due to on-street parked cars on the already narrow Kilkenny streets.	21.10 Refer to response in Row 21.9 regarding the provision of off-street parking. Further, any new development involving a new road system within the draft DPA affected area will require through existing policies a design that can provide an appropriate width for the safe and convenient movement and parking of projected volumes and allow the efficient movement of services and emergency vehicles. Future, development proposals will be required to demonstrate how waste can be managed on site and removed. The Development Plan contains existing policies to assess this matter. As part of the consultation process for the draft DPA the Metropolitan Fire Services and State Emergency Services were also consulted.	21.10 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			With regard to parking congestion in local streets in the area, Council staff are happy to investigate on a needs-basis. Council has not received any advice from Emergency Services or it's waste contractor that they are having difficulties with access under the existing parking arrangements and we would be happy to respond to those service providers or indeed any residents if they seek Council intervention to address issues relating to parking congestion.	
		21.11 A car and traffic master plan for the Kilkenny and West Croydon areas is needed.	21.11 A Local Area Traffic Management Plan for the Croydon, West Croydon and Kilkenny areas has been undertaken by Council in 2006 and have since implemented most of its recommendations. Currently, there are no plans to undertake additional area-wide traffic studies in this area in the foreseeable future.	21.11 No further amendments proposed to the draft DPA.
		21.12 Raised concerns that the population growth will increase traffic movements in the area which will have a negative impact on the amenity of the area as traffic congestion increases. *Indicated that the draft DPA traffic report didn't consider the impact on*	21.12 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic	21.12 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		adjacent West Croydon narrow streets. These streets will be negatively affected by rat-running vehicles seeking alternative routes to arterial roads in hope to avoid David Terrace bottlenecks and frequent delays. *The proposed pedestrian bikeway crossing by the railway crossing will contribute to further traffic delay queues on the already busy David Terrace.*	investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			In terms of traffic distribution on West Croydon streets, the revised traffic investigations estimate that 15% of vehicles departing/arriving from the draft DPA site will use Alfred Road and Rosetta Street, and 5% will use Aroona Road. The increase of traffic volumes on Alfred Road (specifically near the intersection with Rosetta Street) is expected to approach 1,400 vehicles per day, however this figure is still within the acceptable limits for a local street and therefore the additional traffic volume from the proposed draft DPA site is not considered to result in any significant negative impact on the wider local road network. With regard to the intersection of David Terrace and the proposed pedestrian bikeway, the infrastructure for the Outer Harbor Greenway crossing across David Terrace is already in place, constructed by the Department in 2014/15. The Draft DPA traffic investigations considered the intersection functions along David Terrace and within the affected area with the proposed additional volumes (proposed during consultation) and the advice indicated that *additional traffic volumes at the Mundulla Street/David*	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Terrace intersection will increase queues in the channelised right turn lane on David Terrace (for vehicles waiting to turn right) but remain within the capacity of the existing channelised turning lane (even with additional traffic volumes diverted from right turn restrictions at the Pinda Street intersection).	
		21.13 Not supportive of 5-storey building heights.	21.13 Comments noted. Refer to comments in Row 21.3.	21.13 Refer to response in Row 21.3.
		21.14 Consider reducing the proposed floor space area and type of services to be operating from the commercial and retail spaces within the development. Large commercial/retail businesses will increase daily visitation traffic and this will have a negative impact on the adjacent residents.	21.14 Comments noted, refer to comments in Row 21.4.	21.14 Refer to response in 21.4.
		21.15 Raised concerns regarding noise disturbances and increases in air pollution due to increase in traffic and commercial areas.	21.15 Comments noted. The extra vehicular activity generated by the new development is unlikely to significantly increase pollution that impairs air quality of the locality when considering the volume and nature of existing vehicle movements along Kilkenny Road / David Terrace and Port Road. As detailed above a revised suite of policy is proposed to address the traffic concerns received.	21.15 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		21.16 Queried what is considered to be a "low impact and low intensity non-residential development to service the needs of the area?". Local residents already have access to established commercial/retail precincts in close proximity.	21.16 Comments noted. The draft DPA outlined the types of land uses envisaged in the zone under Principle of Development Control 1. Examples of non-residential land uses envisaged include shops, offices and consulting rooms. The draft zone also contains policy in the Desired Character statement which envisages that these uses will cater for the day to day needs of local residents and workers and will be at its greatest intensity closest to the public transit (near the railway station). What is not envisaged is bulky goods outlets and large-scale retail and commercial shops as there are suitable in other locations in the City for these types of uses. Also refer to comments in Row 21.4 with regards to proposed policy amendments to the envisaged floor areas for non-residential land uses.	21.16 Amend the draft DPA policy to reduce commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		21.17 Queried whether the residents of the development will be long-term owners/tenants rather than casual occupiers like "Airbnb" or short-term rent.	21.17 The future tenure cannot be known through the draft DPA process. The Development Plan is a statutory instrument to guide development applications and contains policy to address desired land uses such as types of dwelling forms or non-residential land uses.	21.17 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Short term accommodation is separately defined as tourist accommodation which is assessed differently to that of a dwelling eg. parking provisions. Consideration of tenure for the proposed built form is not a matter that Council can control under current planning legislation.	
		21.18 Queried what % of up to 500 proposed dwellings are envisaged to be reserved for affordable housing due to the overlay requirements?	21.18 The Affordable Housing Overlay policies are not unique to this draft DPA and already exist in the Charles Sturt Development Plan. These policies have been consistently applied to all new major rezoning development proposals across the City, which seek an increase in dwelling yield. The policy envisages a minimum of 15% affordable housing be included where a development comprises 20 or more dwellings which is likely to be the case for the proposed draft DPA Affected Area. The desire for affordable housing opportunities within the established metropolitan area is in line with the Council's Community Plan to provide an urban environment that is adaptive to a changing and growing City. The issue of affordable housing is also an important direction in the State Government's Strategic Plan, and the	21.18 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			South Australian Planning Strategy (the 30-Year Plan). Government's at all levels have a social obligation to ensure all household types can be provided with opportunities to be located in areas close to public transport and other services and offer an integrated housing mix to cater for the varied needs of the community.	
		21.19 Queried how will development display quality urban design, built form and be sustainable?	21.19 Assessing the appearance, urban design elements and built form of a building form an important part of the development assessment process which will occur when individual development applications are lodged in the future. Existing Development Plan policies address building sustainability measures to ensure quality outcomes are achieved.	21.19 No further amendments proposed to the draft DPA.
		21.20 Seeking Council to remain as the manager of waste collection from the completed site, not the future strata title and commercial managements due to Council's current efficient service for maximising the green waste removal for recycling instead of going to landfill.	21.20 Most residential developments that have street frontage utilise Council's standard 3 bin system Future developments will be assessed against existing policy contained in the Development Plan seeking designs to ensure the safe and efficient collection of waste and recycling materials. As a general rule, it is expected that most residential developments will make use of	21.20 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Council's waste and recycling services. There are, however, some circumstances in which severe spatial restrictions and/or high or unusual waste volumes or types at a given site may mean that a Council service is not the most effective or efficient approach. A private service provision may also be required where a developer is unable to provide sufficient space and access for bin storage and presentation. Whether or not a Council service is used, waste and recycling systems for developments of this size and complexity require careful thought and planning demonstrate to Council that a flexible solution can be made for waste management. Collection from a private road or property may be considered by Council where extra assistance is required by elderly and infirm residents, where Council agrees to its waste collection vehicles using a private road or vehicular areas on a property to access a collection point (noting that this will require that internal roads comply with road design requirements for Council's waste collection vehicles).	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			In either of the cases above, Council will require the specific agreement of its waste and recycling contractor. Council will also require documentation from the landholder to indemnify Council and its contractor from any damage that may be caused to private property during the collection process. In relation to commercial (non-residential land uses, Council does not provide a waste collection service for commercial and industrial properties. Applicants must provide details of their proposals to Council as part of the assessment of a development proposal to ensure the development can safely and efficiently store and dispose of its waste, including the pick-up hours for waste disposal units.	
		21.21 *Concerns raised regarding visitor traffic and car parking to M J McInerney Reserve from the proposed combined residential and commercial development occupants and visitors.*	21.21 Consideration of additional parking areas around the existing reserve is outside the scope of this draft DPA. The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing	21.21 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. Traffic issues have been raised earlier and response provided. Amendments are proposed to the draft DPA to reduce the potential yield to address traffic issues raised during the consultation process.	
		21.22 Concerns raised that the increased resident population will overcrowd the MJ McInerney Reserve and the reserve should be increased in size.	21.22 Comments noted. Refer to comments in Row 21.5.	21.22 Refer to response in Row 21.5.
		21.23 Concerns raised with regards to wind tunnelling and shade created by the large height of the proposed buildings. It is not best practise for landscaping and urban design.	21.23 Existing Development Plan policies and provisions proposed within the draft DPA work to limit development to a scale and form that does not unreasonably dominate or overshadow nearby established residences and the public streetscape generally e.g. graduated building height profile. Following submissions received a review to modify building heights has also been considered and resulted in further amendments to the draft DPA. The proposed reduction in built form is considered appropriate to improve the	21.23 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone.	
		21.24 Concerns raised regarding heat islands created by no additional trees or open space within the development.	21.24 In terms of public open space policy amendments are proposed for additional public open space in the draft DPA. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. The detailed design of the public open space is however not a matter that the draft DPA can address (other than the desired approximate location and size). This	21.24 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			ordinarily occurs at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		21.25 Indicated support for the proposed air and noise emissions policy indicating their disappointment with ongoing air and noise problems from nearby non-residential land uses.	21.25 Support for the proposed air and emission policy is noted. The Environment Protection Authority (EPA) in its submission has also supported the propose policy in the draft DPA.	21.25 No further amendments proposed to the draft DPA.
		21.26 Consider upgrading the underutilised Kilkenny Community Hall and the heritage listed Tam O'Shanter Gallery for services, programs and increased ve	21.26 Upgrading community services in the area are subject to Council's on-going review, prioritisation and budgeting processes. While the draft DPA investigations concluded that the affected area is well serviced by a range of community uses, the draft DPA facilitates a range of non-residential community land uses which serve the local population. This is reflected in the draft policy.	21.26 No further amendments proposed to the draft DPA.
		21.27 Indicated that since the mergers of the past three Councils, it is anticipated that that there would be an ongoing process of continuing improvement for our street, neighbourhood and City, consistent with the formal Agreements of the two mergers and ongoing benefits to residents. We seek Council's commitment to maintaining and improving the amenity and services for Kilkenny and West Croydon residents.	21.27 Comments noted. Council's commitment to maintain the City's amenity and services for its community is reflected in its Community Plan 2016 – 2027.	21.27 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
22.	Brett Stafford 37 Aroona Road, Kilkenny	*22.1 In favour of the redevelopment of the former Bianco site however has several concerns detailed below.*	22.1 Noted.	22.1 No amendments proposed to the draft DPA.
		22.2 Opposed to high density development considered aesthetically unacceptable, detrimental to the psychological and physical well-being of residents and ruins the heritage 'village' feel of Kilkenny.	22.2 The proposed density/building heights sought to achieve a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, the intent of this and other submissions to review and modify building heights have been considered and resulted in policy amendments to the draft DPA resulting in a lower form (maximum of 2 storeys, south of Mundulla Street, north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA.. A maximum of three storey-built form is proposed north of Pinda Street up to Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. A maximum of four storeys is proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five storeys as originally consulted as part of the draft DPA.	22.2 Amend the draft DPA policy relating to building heights, anticipated dwelling yield and commercial/retail floor area to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The proposed reduction in built form is considered appropriate and will further improve the transition between the draft DPA Affected Area and the adjacent residential area. The draft density is proposed to be amended following a revised Traffic Impact Assessment (TIA) undertaken to understand the anticipated traffic volumes and impacts to the immediate and surrounding local road network based on a reduced dwelling yield of around 300 dwellings and a reduction in potential commercial and retail floor area.	
		22.3 *Raised concerns regarding increase in traffic on Aroona Road and other local streets which are narrow and not designed for easy service truck access as well.*	22.3 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised	22.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. • In terms of traffic distribution on West Croydon streets, the revised traffic investigations estimate that 15% of vehicles departing/arriving from the draft DPA site will use Alfred Road and Rosetta Street, and 5% will use Aroona Road. The increase of traffic volumes on Alfred Road (specifically near the intersection with Rosetta Street) is expected to approach 1,400 vehicles per day, however this figure is still within the acceptable limits for a local street and therefore the additional traffic volume from the proposed draft DPA site is not considered to result in any significant negative impact on the wider local road network.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		22.4 Indicated that parking issues will increase. Advised that some streets are often impassable forcing some residents to park two wheels illegally on footpaths which impedes wheelchair and pedestrian access.	22.4 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	22.4 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		22.5 Concerns raised with the lack of local shops/supermarkets in walking distance.	22.5 The draft DPA envisages does envisage a mixed-use zone and proposes policy which desires small-scale commercial and retail development that serves only the day-to-day needs of the local community. The proposed floor areas have been amended following the consultation process to reduce the anticipated traffic volumes in the area. 22.6	22.5 Amend the draft DPA policy to reduce desired commercial/retail floor areas.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		22.6 Queried why the proposed development is exempt from the Heritage Area planning provisions that existing residents in the area must follow when renovating or planning additions?	22.6 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites future development will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-	22.6 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			storey built form is also envisaged in this existing Zone.	
		22.7 Raised environmental concerns such as access to the train station, greenways, communal gardens and efficient water catchment.	22.7 Comments noted. The draft DPA proposes greater housing type and density to take advantage of the affected areas location to the Kilkenny train station. The draft DPA also proposes policy for future development to provide space for a proposed greenway connection. The Development Plan also contains existing policy to assess design around proposed communal open space, which is shared between more than dwelling but excludes the private open space of an individual dwelling. With regards to water catchment, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the	22.7 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			potential for stormwater harvesting through various methods including storing in tanks. The zone policy in the draft DPA also addresses the need for future development to incorporate Water Sensitive Urban Design systems. No additional policy amendments in relation to stormwater management are considered necessary in the draft DPA.	
		22.8 Suggested that a new underpass/overpass on the railway line crossing on David Terrace to accommodate for the increase in traffic/population and reduce the traffic load off the already congested local streets.	22.8 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised	22.8 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
23.	Melanie Ford and Lloyd Gedling 6 Wilpena Terrace, Kilkenny	*23.1 Indicated that the existing streets in the immediate vicinity of the proposal are narrow, congested and often have cars parked on either side of the street. Raised concerns that the proposal will only cause further time delays and safety issues.* *Suggested an additional point of access/egress from Port Road via Aroona Road to the south of the current former Bianco site should be fully investigated.*	23.1 A revised Traffic Impact Assessment has been undertaken based on the issues raised in the consultation process based on a reduce yield. The findings indicate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity in the surrounding local road network to cater for the additional traffic based on the draft amended policy. The suggested additional point of access/egress from Port Road via Aroona	23.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Road to the south of the draft DPA affected area is unlikely to be a feasible option to address the scale of traffic envisaged. Further advice from the Department of Infrastructure and Transport (DIT) indicates that the Department's levels crossing policy will not permit any new level crossings. Consequently, a new crossing of the Outer Harbour rail line would not be supported to connect the affected Area from Aroona Road to Port Road.	
		23.2 Considers that future commercial space should be limited to fronting onto David Terrace to minimise further traffic congestion in the suburban streets.	23.2 The draft DPA policy seeks uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes and policy proposed to guide the location of non-residential land uses adjacent to David Terrace and east (adjacent to Wilpena Terrace).	23.2 Amend the draft DPA policy to reduce desired commercial/retail floor areas and location.
		23.3 Considers the proposed density is not reflective of or sympathetic to the existing historic conservation area.	23.3 The draft DPA responds to local interface context, including the existing *Historic Conservation Area*, by adopting the proposed graduated building height approach. Following submissions received a review to modify building heights and desired yield has	23.3 Amend policy to the draft DPA to reflect the proposed reduction in building heights and desired yield to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			also been considered and resulted in proposed policy amendments to the draft DPA. The proposed reduction in built form and yield is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		23.4 Concerns that the proposal would allow for new developments to dominate existing residences at 3-5 storeys which will change the micro climate within the immediate area affecting access to sun and prevailing breezes for nearby existing residences. Suggests limiting built form to 2 storeys maximum at the fringes of the proposed area is strongly preferred.	23.4 The draft DPA proposes amendments to further scale building height down towards the interfaces of the neighbouring residential areas, with a maximum 2 storeys proposed near that transition boundary adjacent to the existing *Historic Conservation Area*. The graduated building height approach aims to not unreasonably dominate or overshadow the nearby established residences and the streetscape generally.	23.4 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.
		23.5 Raised concerns regarding the significant increase in density will increase the area of hard surfaces, thus radiating more heat into the immediate surrounding area and increasing stormwater runoff/loss.	23.5 While a higher density is proposed in the draft DPA, amendments are proposed for additional public open space in the draft DPA. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%).	23.5 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. The detailed design of the public open space is however not a matter that the draft DPA can address (other than the desired approximate location and size). This ordinarily occurs at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The zone policy in the draft DPA also addresses the need for future development to incorporate Water Sensitive Urban Design systems. No additional policy amendments in relation to stormwater management are considered necessary in the draft DPA.	
		23.6 Seeking more public open space.	23.6 Refer to comment in Row 23.5.	23.6 Refer to response in Row 23.5.
		23.7 Suggestions to include urban design requirements within the rezoning to provide alternative methods for minimising the effects of radiated heat and changes to micro climate. In addition, requirements for making best use of stormwater within new dense urban developments and greening the area.	23.7 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General	23.7 Refer to responses in Row 23.5 and 23.6.

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			Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments "above ground". The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees.	
24.	Elsje Stolk & William Cornish 75 Wilpena Terrace, Kilkenny	*24.1 Concerns with an increase in traffic in side streets near the development which may ruin the quiet area.*	24.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed	24.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

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			revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		24.2 Concerns raised with the proposed dwelling yield. Concerned with social issues.	24.2 Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network.	24.2 Amend the draft DPA policy relating to building heights, desired dwelling yield and desire for additional public open space to address concerns raised through the consultation process.

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			With regards to social issues this matter cannot be assumed to be attributed directly to a higher density of living and is not considered a planning matter to address in the scope of the draft DPA.	
		24.3 Considers the proposed limit of 5-storeys is too high.	24.3 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	24.3 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.
		24.4 Concerned parking for nearby residents might also become an issue if the new development does not provide sufficient garaging space for each home.	24.4 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular	24.4 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. In terms of specific garaging space, this is an issue that has been identified and raised by Council in its submission to the State Planning Commission as a policy issue that requires attention in the Government's new Planning and Design Code.	the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		24.5 Concerned the newly renovated MJ McInerny Reserve is not big enough to cope with the increased demand that the new redevelopment would bring.	24.5 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown	24.5 Amend the draft DPA, to address the desire for additional public open space.

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			spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		24.6 *Suggests traffic flow through the side streets be monitored/surveyed to determine the impact of higher usage on nearby homes.*	24.6 As part of the updated traffic investigations that were undertaken post public consultation in light of issues raised in several submissions, recent traffic counts were within the draft DPA affected area were utilised to confirm existing traffic movements to the surrounding local road network and compare the potential impacts to the revised anticipated traffic movements. The revised investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. A Local Area Traffic Management Plan for the Croydon, West Croydon and Kilkenny areas has also been undertaken by Council in 2006 and have since implemented most of its recommendations. Currently, there are no	24.6 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			plans to undertake additional area-wide traffic studies in this area in the foreseeable future.	
		24.7 Suggests an upper limit of 150 homes be placed on the development and a maximum 2 storeys per home be enforced in clusters in cul-de-sac settings.	24.7 Refer to comments above in Rows 24.2 and 24.3.	24.7 Refer to responses above in Rows 24.2 and 24.3.
		24.8 Seeking sufficient parking including 2 allocations per home plus visitor car parks be provided.	24.8 Refer to comments above in Row 24.4.	24.8 Refer to responses in Row 24.4.
		24.9 Seeking playgrounds and barbeque facilities be included in the plan.	24.9 The MJ McInerny Reserve and surrounding reserves within the Council area provide sufficient playgrounds and barbeque facilities for existing and new residents in the area. The MJ McInerney Reserve was recently significantly updated to respond to higher order recreation provisions. Further upgrades would be dependent on the level of increased future demand.	24.9 No further amendments proposed to the draft DPA.
25.	Michael Blanch Director, Operations Visy Glass (formerly known as O-I Glass)	25.1 *Strongly opposed to the rezoning the draft DPA initiates. OI believes that the draft DPA is fundamentally flawed and should be discontinued and abandoned.*	25.1 Objections to the draft DPA are noted.	25.1 No further amendments proposed to the draft DPA.
		25.2 *Concerned that the draft DPA dramatically affects and impacts on the OI property which is OI's main site*	25.2 The draft DPA investigations have carefully considered the noise and air emissions from the OI Glass facility and adjacent warehouse	25.2 Amendments to the draft DPA proposed to incorporate a Concept Plan

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		for the production of wine bottles and other glass containers.	facility. The investigations support policy measures to manage noise impacts. Further policy amendments are proposed including a Concept Plan to provide the specific policy support for design and construction of development in this location based on the approach adopted by Sonus in their recommendations during the investigation stage.	to include the approach adopted by Sonus in their recommendations to provide the specific policy support for design and construction of future development in this location.
		25.3 *Seeking certainty regarding the operating conditions of the plant as well as the legislative and policy provisions that apply to the site and adjacent land. Concerned that a high-density residential development of the type envisaged in the draft DPA cannot occur in a manner that is compatible with glass manufacturing*	25.3 It is acknowledged that OI glass desire certainty. The proposed draft DPA policy has investigated the needs to ensure operational aspects of the existing facility within the scope of the current licence are not impacted by development of the affected area. The draft policy which was consulted on was reviewed and supported by the Environment Protection Authority (EPA) in their submission. The draft policy response at the time was informed by the State Government's position for not allowing Concept Plans which were central to the approach adopted by Sonus in their recommendations. This position has now been revised to provide the specific policy support for design and construction of development in this location.	25.3 Amendments to the draft DPA proposed to incorporate a Concept Plan to include the approach adopted by Sonus in their recommendations to provide the specific policy support for design and construction of future development in this location.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		25.4 *Advised OI currently meets all relevant environmental requirements and experiences very low levels of complaint from adjacent residential areas - the encroachment of sensitive land uses within the vicinity of the plant and the new warehouse presents an unacceptable risk of reverse environmental impacts which, in turn, will restrict the efficient on-going operations on the site*	25.4 Refer to comments in row 25.3. The proposed policy measures put in place for design and construction of resultant residential development seek to mitigate impacts from OI Glass facility (including adjacent warehouse).	25.4 Refer to response in row 25.3.
		25.5 Considers the draft DPA does not meet Council's own criteria for undertaking a privately funded DPA since - → *the proposed policy framework is not aligned with nor justified by the State's Strategic Plan, the State Planning Policies or the 30 Year Plan for Greater Adelaide* → *these documents stress the importance of preventing land use conflicts and of protecting employment lands from residential encroachment, questions that the DPA does not answer or analyse sufficiently*	25.5 State Strategic documents such as the 30 Year Plan for Adelaide identify the north-west corridor as a location that supports urban growth and numerous policies support increasing densities at strategic locations, such as train stations along this corridor. It is acknowledged that there are also policies which seek to support existing prime industrial land, and it is considered that the draft DPA addresses these matters through noise and air emission investigations. The Investigations are aligned with the Industrial Land Study and Employment Land Review. It is inaccurate to state that they do not support rezoning of the affected area as both documents specifically identify the affected area (as a distinct part of the West Croydon / Kilkenny Prime Industrial Area as	25.5 Refer to response in row 25.3.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		→ *the DPA is not aligned with either Council's Industrial Land Study or its more recent Urban Employment Land Review both of which identify the West Croydon/Kilkenny South area as being a Prime Urban Employment Area (termed a Prime Industrial Area in the former report), a strategic employment area that contributes to the local economy, and stress the importance of protecting the area from rezoning and encroachment as well as highlighting that there is a large supply of housing potential over the next few years - the DPA runs contrary to and undermines these reports* → *the existing zoning of Urban Employment represents a suitable and contemporary policy regime that appropriately reflects the range of well-established land uses - the DPA has not justified the radical and*	suitable for rezoning both of which identify this long dormant site as suitable for alternative land uses to industrial. The investigations clearly state a strategic intent to provide for better and higher use of the affected area due to its proximity to the rail station. Previous studies have also explored this intent and the draft DPA aligns with these recommendations. The investigations supporting the draft DPA demonstrate that impacts can be mitigated through design and construction measures and this will be reflected within the policy.	

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		sudden departure from this existing policy framework → *the DPA will create negative economic outcomes for manufacturing in this area in that it does not address fully the broader social, environmental or economic considerations associated with the rezoning which are reflected in Council's Privately Funded DPA Policy*		
		25.6 The draft DPA is not aligned with the key provisions of the State Planning Policies in that it does not protect employment lands, and in particular the prime industrial land in the West Croydon/Kilkenny South area, from residential encroachment and thereby jeopardising OI's existing operations and future expansion potential by - → *seeking to introduce new sensitive land uses in close proximity to OI's manufacturing plant and warehousing which will enhance community exposure to noise and emissions in contradiction with SPP 16 relating to emissions and hazardous activities - this*	25.6 The investigations undertaken by Sonus and Enviroscan demonstrate that development in this location can suitably mitigate impacts of noise and air emissions from the OI Glass facility. SAPP 9: Employment Lands has the objective of [providing]… *sufficient land supply for employment generating uses that supports economic growth and productivity*. Relevant policies include: *9.2 Enable opportunities for employment and encourage development of underutilised lands connected to, and integrated with, housing, infrastructure, transport and essential services.*	25.6 Refer to response in row 25.3.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		stresses the critical importance of preserving the State's industrial infrastructure capacity and employment levels and of avoiding or mitigating interface risks via, in part, appropriate separation distances to provide greater certainty for industry → *failing to send the right signals to the market to attract and retain interest and investment in manufacturing opportunities in the State (SPP 9)*	*9.3 Support state-significant operations and industries and protect them from encroachment by incompatible and/ or more sensitive land uses.* *9.6 Protect prime industrial land for employment use where it provides connectivity to freight networks; enables a critical mass or cluster of activity; has the potential for expansion; is connected to skilled labour; is well serviced; and is not constrained by abutting land uses.* *9.11 Encourage the development of integrated employment and residential mixed-use precincts where conflicts between uses can be managed.* Council has previously identified that the affected area is not a prime employment land due to a range of factors, and that its rezoning would not impinge on the overall land supply of employment land within the Region. In addition, SAPP 9 supports the potential for diversification of employment land where conflicts can be managed and where underutilised. This is the case for the affected area.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			SAPOP 16: Emissions and Hazardous Activities has the objective of [protecting]… *communities and the environment from risks associated with emissions, hazardous activities and site contamination, whilst industrial development remains viable.* The draft DPA suitably considers the level of protection required for this location in its assessment of air and noise impacts from the OI-Glass facility and adjacent warehouse facility. Measures have been recommended to mitigate impacts and these will now be better integrated into the policy through the concept plan supporting the policy. This includes considerations as to how the planning policy would be applied through the Planning and Design Code. It is noted that Policy 16.1 seeks for an appropriate mix of compatible land uses, separation distances and mitigating emissions at the source or receiver. The investigations support this approach and resultant policy achieves the intent of the policy. It should also be noted that the draft DPA is consistent with SAPP 1: Integrated Planning (including the Principles of Integrated Planning), SAPP 3: Adaptive Re-use	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			(supporting re-use of Local Heritage Place), SAPP 6: Housing Supply and Diversity (denser development in transport catchments, increasing diversity in housing supply, support provision of affordable housing).	
		25.7 *The draft DPA is in conflict with key provisions of the 30 Year Plan for Greater Adelaide in that it -* → *encourages the displacement of existing manufacturing land in favour of residential development thereby failing to protect employment land from encroachment by housing and to prevent the subsequent land use conflicts (Manufacturing and Defence Policy 69)* → *does not support land use activities in the form of strategic employment land options that require separation from sensitive land uses (Employment Lands Policy 73)*	25.7 The Policy provides for design to appropriately manage and mitigate conflicts between the land uses and the investigations support this approach through the use of the Minister's Specification SA 78B – Construction requirements for the control of external sound" and specifically the measures adopted within the specification relating to Code for Sound Exposure Categories. The application of policy 73 is out of context. This relates to new prime employment areas, not existing areas that have an established residential context. Notwithstanding this, strategic assessment of employment land supports the rezoning of the affected area. It is noted that the draft DPA has been supported by both the EPA and DPTI through the Statement of Intent where the intent of the draft DPA is articulated, supporting sufficient consistency with the 30	25.7 Refer to response in row 25.3.

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			Year Plan for Greater Adelaide. In addition, both DPTI and the EPA do not object to the investigations, and policy direction. Further policy is proposed as detailed in the comments in row 25.3.	
		25.8 *Outlines that there is no plausible justification for the radical and sudden departure from existing policy settings, with no satisfactory explanation in the draft DPA to support the change in direction for the proposed zoning and new policy*	25.8 Refer to response in row 25.5.	25.8 No further amendments proposed to the draft DPA.
		25.9 Indicated that the relationship between the location of land uses and their compatibility is a fundamental land use policy consideration, a matter of basic 'first principles' planning, which is the responsibility of a Council to properly address as a primary and fundamental issue in undertaking a DPA, ie will those land uses being proposed be well-suited and matched with nearby existing land uses, especially those of a lawful long-standing nature - Council has failed to consider the primary question of land use and its contextual fitness in the DPA.	25.9 Noted. The above issues and responses adequately address this matter. See above responses.	25.9 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		25.10 Concerned severe interface impacts will be created by the incompatible land use mix. Indicated that currently, OI operates 24/7 throughout the year and within all relevant environmental requirements and obligations but the increase in the number of sensitive properties being created by the DPA close to the OI plant will make OI's environmental challenge considerably more complex and create conflict, with potential to lead to increased environmental management costs which will impact on the viability of the plant - OI is strongly concerned with the probability of future residential complaints and the inevitable escalation of environmental licence conditions that would require significant investment and consequent impact on OI's competitive position in the market.	25.10 The draft DPA investigations have been undertaken with the best knowledge of OI Glass operations. Indeed, the Acoustic consultants selected for this draft DPA were specifically those utilised by OI (and this was done with OI Glass's consent) and have previously developed a detailed model from their operations to assist with previous noise issues with other existing residential areas. Council also willingly engaged with OI Glass in the preparation of the investigations, including requesting additional information about new equipment. However, the consultants have confidence in the quality of the assessment and the model as it has been based on the full operational licence capacity of the plant, which, at the time of the investigations, was significantly above the existing operating capacity of the plant. This criteria was a requirement of the EPA. It should also be noted that Council sought to involve the EPA as part of the investigations to peer review the findings and recommendations. The EPA have endorsed the methodology and findings of both the Air and Noise Emissions technical studies.	25.10 Additional amendments proposed in the form of policy and Concept Plan to provide more clarity for future development to be designed and constructed based on sound exposure categories.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The recommendations and supporting policy approach to the design and construction of the buildings within the affected area will suitably address noise criteria through the application of the Minister's Specification, a position supported by the EPA. In addition, there is policy within the proposed amendment which also mentioned development within the evaluation distance of an active Environment Protection Act 1993 licensed activity, needs to design itself to mitigate potential impacts as a further policy mechanism for the assessment process. This was added based on the advice of the EPA at the time of the preparation of the draft DPA policy. This policy is in addition to the Noise and Air Emissions Overlay policy. Additional amendments are proposed in the form of policy and Concept Plan to provide more clarity for future development to be designed and constructed based on sound exposure categories. This additional policy is supported by the EPA.	
		25.11 OI expresses concern that the draft DPA has been initiated without a true and accurate understanding of the potential environmental impacts (acoustic and air quality) of the plant	25.11 Refer to comments in row 25.10.	25.11 Refer to row 25.10 in relation to further amendments proposed.

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		on future medium to high residential development taking place on the rezoned land - it is plain that major industrial land uses that are located close to residential development are, in principle, incompatible with such housing.		
		25.12 *There are numerous shortcomings, errors and omissions in the investigations and analysis informing the draft DPA, particularly the following flawed assumptions -* → *as to how the future interface issues of noise, odour and air emissions can be successfully managed to mitigate adverse impact* → *that there is sufficient distance between the OI land and the future residential development to competently overcome these impacts*	25.12 Refer to comments in row 25.10.	25.12 Refer to row 25.10 in relation to further amendments proposed.
		25.13 Consultants engaged by OI have identified deficiencies in the way nuisance issues have been addressed in the DPA and have concluded that adverse interface impacts will result from allowing the proposed residential development –	25.13 The reports have been peer reviewed by the EPA and found to be appropriate for their purpose. It is noted that OI have previously challenged the Air Quality Report findings, methodology and assumptions and that this objection was rejected by the EPA before the draft DPA investigations were	25.13 Refer to row 25.10 in relation to further amendments proposed.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		→ *AE/Peer Review Air Quality Report - unless air quality impact assessment is revised to address shortcomings in the methodology employed in the DPA, it is considered likely that unacceptable risk of adverse health and nuisance impacts on the future residential development could occur as a result of the on-going lawful operation of the OI facility* → *Resonate/Environmental Noise Assessment - the DPA would allow encroachment of a noise sensitive land use within the vicinity of OI which would not receive the full benefit of the 6m high acoustic wall constructed (by OI) to reduce impact on existing dwellings to the northeast of its land; moreover, there is no mechanism to trigger a mandatory industrial noise assessment being undertaken for verifying whether an acceptable acoustic amenity for new residential development can be achieved, nor do the*	formally commenced. Council have asked the EPA to further review the objections in response to the submission being received and have had it confirmed that their original position on the suitability of the report remains unchanged. The Resonate report does not challenge the technical rationale underpinning the provisions within the Sonus Report. Indeed, Resonate *"agree with the underlying philosophy of adopting the Minister's Specification or similar to address industrial noise from O-I"*. Council has sought additional advice from the EPA in response to the issues raised by OI and their consultants in the submission. As previously stated, the assessment has been based on a conservative assessment of potential noise source, having regard to OI's full licence capacity, and the suggested policy approach are supported by the EPA as appropriate in mitigating the risks.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		proposed planning policy criteria safeguard OI from unmitigated encroachment of new residential development		
		25.14 Suggests that the draft The DPA is contrary to the logical and long-standing policy trajectory for the area which has been in place for some time and which has acknowledged and confirmed the area's deep rooted industrial and related land uses - *→ there have been no material changes to the land uses and planning considerations that underpin the current zoning structure or philosophy* *→ accordingly, there is no plausible justification for the extreme change in land use direction proposed by the DPA, with no satisfactory explanation that supports the new residential zoning* *→ the underlying premise and the policy direction of the DPA cannot be substantiated by the investigations and analysis undertaken and is therefore deficient*	25.14 While it is noted that the draft DPA seeks an alternative land use policy for this location, it is important to recognise that the former Bianco site has remained vacant in excess of 10 years. A large amount of strategic land use planning has occurred over the last 10 years which have identified that an alternative use of the affected area is warranted. It is considered that there is strategic justification for a potential change in use.	25.14 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		Air quality *25.15 The Enviroscan air quality assessment upon which the draft DPA has relied has been subject to a peer review which raises serious concerns and doubts about the reliability and accuracy of the Enviroscan findings and seriously challenges Council's contention that no specific policy response is required in the draft DPA.*	25.15 The reports have been peer reviewed by the EPA and found to be appropriate for their purpose. It is noted that OI have previously challenged the Air Quality Report findings, methodology and assumptions and that this objection was rejected by the EPA before the draft DPA investigations were formally commenced. Council have asked the EPA to further review the objections in response to the submission being received and have had it confirmed that their original position on the suitability of the report remains unchanged. The Resonate report does not challenge the technical rationale underpinning the provisions within the Sonus Report. Indeed, Resonate *"agree with the underlying philosophy of adopting the Minister's Specification or similar to address industrial noise from O-I"*. Council has sought additional advice from the EPA in response to the issues raised by OI and their consultants in the submission. As previously stated, the assessment has been based on a conservative assessment of potential noise source, having regard to OI's full licence capacity, and the suggested policy approach are supported by the EPA as appropriate in mitigating the risks.	25.15 Refer to row 25.10 in relation to further amendments proposed.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		25.16 The peer review report by AE believes that the draft DPA has adopted a simplistic approach to the assessment of the potential impacts on the proposed residential development and that it has not been satisfactorily demonstrated that the lawful operations of OI will not have an adverse air quality impact on the new housing - the identified deficiencies are such as to strongly question the outcomes reached in the Enviroscan assessment.	25.16 Refer to comments in row 25.15.	25.16 Refer to row 25.10 in relation to further amendments proposed.
		25.17 The AE report has identified a number of areas where the methodology adopted in the Enviroscan assessment is either deficient or fails to provide adequate justification of the assumptions adopted, including the - *→ choice of air dispersion model* *→ selection of meteorological data set* *→ estimated emissions from the site* *→ assumption of flat terrain* *→ selection of background data.*	25.17 Refer to comments in row 25.15.	25.17 Refer to row 25.10 in relation to further amendments proposed.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		25.18 Given the potential variability in the results produced by adopting those methodologies, it could be expected to result in non-compliances with the air quality objectives for the area affected by the draft DPA. The AE report recommends that the air quality assessment undertaken by Enviroscan needs to be revised to address the shortcomings identified otherwise it is likely that unacceptable nuisance risk will impact on the future residential development as a result of OI's on-going lawful operations	25.18 Refer to comments in row 25.15.	25.18 Refer to row 25.10 in relation to further amendments proposed.
		Noise *25.19 OI is critical of the Council relying on the Sonus 2019 acoustic report in drafting the DPA rather than having regard to the Sonus 2012 acoustic report, commissioned by OI, in reviewing predicted noise levels from the manufacturing site as to their likely impact on potential TOD proposals that were then being pursued by Council - the 2012 assessment concluded that irrespective of any measures incorporated -*	25.19 Refer to comments in row 25.15.	25.19 Refer to row 25.10 in relation to further amendments proposed.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		→ *noise levels from the OI site will be high when experienced on balconies or upper storeys of residences* → *noise levels will not achieve the acoustic goals outside of residences or within residences when external doors and windows are open* → *there are no practical methods to reduce the noise on balconies or inside with open windows* → *there is significant potential for OI plant noise to result in complaints from residences and, in turn, for residences to significantly constrain the existing and potential future activities on the OI site*		
		25.20 OI notes that the 2019 report recommended several policy mechanisms, such as the imposition of suitable treatments to future dwellings to provide a reasonable level of acoustic amenity, but those policy levers were neglected in the DPA draft and consequently no protection is offered in the new policy framework	25.20 It is noted that the policy mechanisms identified by Sonus in their assessment were not reflected within the draft DPA. This position was largely driven as a result of direction from DPTI and in response to the inability to accommodate Concept Plans as part of the amendment. Notwithstanding this, the policy coverage was considered to be achieved through the adoption of the Noise and Air Emissions Overlay, the coverage and	25.20 Refer to row 25.10 in relation to further amendments proposed.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		to ensure the unfettered operation of both existing and envisaged industrial activity in the locality - by not accepting these, there is no acoustic engineering support for the position adopted in the draft DPA	recognition of needed to mitigate impacts from the OI facility in the Desired Character Statement and the inclusion of the additional policy relating to ensuring development achieves the Environment Protection (Noise) policy, and the general interface provisions in the Development Plan. This policy approach was supported by the EPA through their submission. Since the draft DPA was prepared, Council is now aware of the ability to include a Concept Plan for this location and is seeking that this occur to reflect the Sound Exposure Classification levels identified by Sonus in their investigations across the site. Council believes this will make interpretation and understanding of potential noise impacts and mitigation measures easier to interpret and understand for both proponents and assessing planners. The amendments in the proposed Concept Plan are supported by the EPA. The Agency has indicated that 'the inclusion of the predicted sound exposure categories within the concept plan would allow developers to easily refer to the requirements and ensure that any residential use closer to noise sources have the requirements *of SA78B*	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Construction requirements for the control of external sound applied'. The importance of the amendments including the Concept Plan will be highlighted to the Department and the Minister should the draft DPA be approved by Council for the Minster's consideration. It is acknowledged that future proposals will need to be accompanied by expert advice which demonstrate achievement with the criteria identified within the Concept Plan map, however, given the site is likely to be largely developed as a single master planned development, this is not considered an unreasonable or onerous requirement. Receiving such advice is not unusual as part of an application process and is commonly received for mixed use development and developments within the CBD adjacent to noise sources (such as hotels in the CBD). The Minister's Specification applies to all Class1, 2, 3, 4 and 9B buildings, all of which would accommodate sensitive land uses (as outlined within Development Regulations, 2008). As such, the applicability of the overlay is appropriate to addressing the forms of development envisaged within the draft DPA. While the intent of the Minister's	

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			Specification is to mitigate road and rail noise for sensitive land uses, it aims to achieve an indoor occupant amenity that would be consistent with an industrial noise source, and therefore its application is appropriate. Sonus have adapted the Specification for use with Industrial Noise and this approach is not challenged by both Resonate Acoustics and the EPA. No single policy with the Development Plan is mandatory, and rather, an assessment on balance by the assessing authority is undertaken. This is no different for any forms of development (and Development Plan policy for that matter). However, there is considered to be sufficient strength in the policy relating to the importance in addressing noise impacts from the OI Glass facility to ensure sufficient weight and consideration is given to the policy and Concept Plan Map measures. In addition, measures are reinforced through the Building Code Assessment (either as Deemed-to-Satisfy or through performance assessment). It is acknowledged that the Minister's Specification only relates to mitigating noise from internal noise sources and not external spaces, such as balconies and private and	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			communal open space. In this regard, there is policy support within the Noise and Air Emissions Overlay that addresses design responses to this, including, the careful location and placement of balconies and yard spaces so that they are shielded from the noise source.	
		25.21 In any case, the adoption of those recommendations is flawed in that the complexity built into achieving the policy aims would require expert acoustic engineering input to interpret and apply thereby highlighting the problem of trying to deal with an inherent incompatible set of land uses by 'management-type' techniques at the development application stage - this approach is wrong in principle	25.21 Refer to comments in row 25.20.	25.21 Refer to row 25.10 in relation to further amendments proposed.
		25.22 The DPA's reliance on the 'Noise and Air Emission Overlay' being applied to trigger the Minister's Specification SA78B for road and rail corridor noise sources is misplaced as these measures would not necessarily be sufficient to mitigate against industrial noise which is not typically considered to be part of SA78B - there is a gap in this policy	25.22 Refer to comments in row 25.20.	25.22 Refer to row 25.10 in relation to further amendments proposed.

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		approach with regard to mandating as part of the Minister's Specification that industrial noise be considered when providing acceptable acoustic amenity for residential development		
		25.23 Advice provided by Botten Levinson underscores the view that placing faith in SA78B is flawed anyway since - → *its requirements are not mandatory* → *it can be dispensed with from time to time* → *it has no application to external areas such as balconies, garden areas, communal spaces or rooftop decks* → *none of its triggers relate to noise from operations arising from a long-standing industrial use* → *none of its construction requirements to mitigate noise*	25.23 Refer to comments in row 25.19.	25.23 Refer to row 25.10 in relation to further amendments proposed.

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		are applicable to these sorts of land uses		
		25.24 As the DPA appears to defer acoustic assessment to the subsequent development application stage, this is likely to result in either reverse amenity impacts affecting OI's operations and/or unforseen esoteric construction requirements and/or limitations on developers in the area affected by the draft DPA	25.24 The SEC levels identified by Sonus are mostly SEC category 3 or below, based on the mapping of source noise levels. Sonus have identified that treatments of SEC and below can be achieved using extensive but reasonable and practicable measures. It is noted that a small section of the affected area is within a SEC category 4, but this is limited to a portion of the affected area identified as being available to accommodate the greenway along the rail corridor within the proposed policy. The approach is not considered to render the site undevelopable or unviable to develop as a result of the required façade construction requirements to achieve the necessary internal sound levels.	25.24 Refer to row 25.10 in relation to further amendments proposed.
		25.25 The Resonate report states that although good design practice could be used for high density development, it would require great oversight to ensure due consideration is given to all noise source parameters but, at present, the mechanisms to confirm that sites	25.25 Refer to comments in row 25.20.	25.25 Refer to row 25.10 in relation to further amendments proposed.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		will be developed to appropriately mitigate noise arising from OI's activities do not exist		
		25.26 The OI submission states that it does not have confidence that the new Code as it presently stands will address the noise interface issue adequately (being very generic in nature), hence it is unlikely that the DPA provisions (assuming that it does adopt specific robust and tailored noise policy) will be transitioned over into the Code thereby resulting in a policy vacuum with the clear risk that potential reverse amenity acoustic impacts on OI operations are unable to be managed	25.26 The draft DPA is being prepared within the existing SA Planning Policy Library and legislation, and as such has been drafted in response to this. OI's confidence in the Code's ability to address this interface issue is noted, and Council has been working with the Department to ensure that the effective transition of policy content is achieved as a result of the draft DPA. The ability to include Concept Plans has made this easier and provided greater confidence to Council that this important policy measure can be effectively transitioned into the Code. This is a key reason why a Concept Plan is now proposed as part of the amendment. The importance of the amendments including the Concept Plan will be highlighted to the Department and the Minister should the draft DPA be approved by Council for the Minster's consideration. This will be supported by the Noise and Air Emissions Overlay (which triggers the Minister's Specification) as well as general interface policy.	25.26 Refer to row 25.10 in relation to further amendments proposed.

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			In addition, the Department have advised that a new 'Interface Management" Overlay is proposed that would provide additional policy support for addressing interface challenges between sensitive land uses and lawfully operating land uses, including - placement of buildings and rooms sensitive to noise away from the source, or behind those with non-sensitive uses; and screening of open space away from noise sources. The Overlay seeks development of sensitive receivers be designed in a manner that mitigates potential adverse environmental and amenity impacts generated by lawful operations of neighbouring land uses. It is considered the draft DPA policy can provide appropriate policy coverage in the transition to the Code (noting that this does not form part of this DPA). This Overlay is proposed to be recommended by Council to the Minister to transition the draft DPA to the Code should it be approved.	
		25.27 To address the perceived Code weakness, the Resonate report recommends that in order for the new Code to successfully manage noise encroachment impacting upon	25.27 Refer to comments in row 25.26.	25.27 Refer to row 25.10 in relation to further amendments proposed.

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		sensitive land uses the following measures need to be adopted - → *existing noise generating uses (industry and similar) be included in the 'Noise and Air Emissions Overlay'* → *noise sensitive development in the vicinity of noise sources so designated in that Overlay be assessed in accordance with the Minister's Specification or similar* → *the Minister's Specification be updated to include a framework for assessing and providing building policy for noise sensitive developments within the vicinity of industrial noise sources*		
		25.28 OI believes that the DPA's assumption that OI operations are static and will not evolve or change in the future is flawed - land use is not static and the investigations undertaken in the DPA do not address the possibility that the existing (full existing potential)	25.28 Council cannot speculate as to the future operations of any surrounding activity as part of its considerations for the draft DPA. While it is acknowledged that OI operations may change over time, this is the main reason why the modelling and assessment has been based on the current licence capacity, which is significantly more intense	25.28 Refer to row 25.10 in relation to further amendments proposed.

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		operations will undergo change, and as a consequence the implications of such an eventuality have not tested or substantiated *The expert assessments that have undertaken provide only a 'snapshot' of OI's operations over the last few years and have not considered the potential for environmental nuisance associated with expanded activities or increased output on the OI site, which could increase environmental impacts and thereby lead to different desired outcomes that the DPA seeks to achieve.*	in operation than what is understood to be OI's current operations. As such, the assessment is conservative.	
		25.29 OI holds the view that if the draft DPA proceeds, the context and environment within which OI operates will change with serious implications for its existing and any planned future evolution of its activities, to the extent that its operations may be constrained and the company forced into implementing additional environmental mitigation works at significant cost to meet its general	25.29 Council sought additional advice from the EPA on the implications of the existing licence and conditions for OI upon development of the affected area. The EPA indicated that: • *"investigations into the potential impacts of air and noise emissions have been undertaken and the EPA's review and assessment of those investigations gives us some level of confidence that they are either not likely to be an issue (in the case of air quality) or could be addressed*	25.29 Refer to row 25.10 in relation to further amendments proposed.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		environmental duty and licence obligations.	*through careful application of planning policy and design and engineering solutions (in the case of noise).* • *Whilst the modelling gives a good understanding of the potential impacts of air and noise emissions, there is no guarantee that there wouldn't be complaints from future residents should the DPA be approved and subsequent development occurs on the affected area.* • *However, with proper planning and design of any future developments the risk can be mitigated.* • *The EPA does not consider that approval of the DPA would automatically lead to changes to the O-I licence."*	
		25.30 *Concerned the draft DPA's assumption that future interface issues such as noise, odour and air emissions can be successfully managed by relying on existing statutory, legislative and licensing regimes as well as future planning policy ordinance - managing incompatibility between land uses using such mechanisms, and through the imposition of conditions of consent on future development applications, is wrong as a matter of principle*	25.30 Comments noted. The proposed policy approach in the draft DPA has been supported by the EPA as appropriate in mitigating the risks.	25.30 Refer to row 25.10 in relation to further amendments proposed.

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		25.31 Considers that at the development assessment stage, the first and fundamental question a relevant authority must determine is the question of land use, ie whether a proposed use is compatible with the orderly and proper planning of the locality and in line with Development Plan provisions - no question of 'management' of a proposal arises unless and until it is sound in principle in regard to its land use 'fit'.	25.31 Refer to comments in row 25.26.	25.31 Refer to row 25.10 in relation to further amendments proposed.
		25.32 Considers the above is even more strongly applicable at the DPA stage in that it is a Council's responsibility to address, as a primary and fundamental issue, whether the land uses being proposed by a DPA will be compatible with nearby existing land uses and, relevant in this case, with long-established lawful land uses - in this respect, OI believes Council has failed to properly address the question of compatibility and has put faith in minimising the incompatibility between land uses through the introduction of management-type techniques written into Development Plan policy and/or reliance on conditions of consent at	25.32 Refer to comments in row 25.26.	25.32 Refer to row 25.10 in relation to further amendments proposed.

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		the subsequent development application stage and/or relevant statutory and licensing regimes.		
		25.33 Advice indicates that the draft DPA cannot be justified by assuming that the regulatory framework in the Environment Protection Act will mitigate inherent land uses conflicts.	25.33 Comments noted. The proposed policy approach in the draft DPA has been supported by the EPA as appropriate in mitigating the risks.	25.33 Refer to row 25.10 in relation to further amendments proposed.
		25.34 OI undertakes several prescribed activities of environmental significance which operate under an EPA licence obliging OI to take measures to prevent or minimise negative environmental impacts arising from its operations - *→ these obligations, however, are not absolute and do not prohibit OI from undertaking activities that may impact the surrounding area* *→ the obligations are contextual in that they must be read in the context of the locality and, in this sense, the permitted land uses of the locality are directly relevant* *→ if the DPA proceeds, this context changes dramatically, with the introduction of*	25.34 Council sought additional advice from the EPA on the implications of the existing licence and conditions for OI upon development of the affected area. The EPA indicated that: • *"investigations into the potential impacts of air and noise emissions have been undertaken and the EPA's review and assessment of those investigations gives us some level of confidence that they are either not likely to be an issue (in the case of air quality) or could be addressed through careful application of planning policy and design and engineering solutions (in the case of noise).* • *Whilst the modelling gives a good understanding of the potential impacts of air and noise emissions, there is no guarantee that there wouldn't be complaints from future residents should*	25.34 Refer to row 25.10 in relation to further amendments proposed.

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		concentrated residential development as a prevailing land use, to the extent that OI's operations may be compromised and constrained and/or forced into additional mitigation works at significant cost → *the general environmental duty in the Environment Protection Act and OI's licence conditions requires OI to take all reasonable and practicable measures to prevent noise and odour leaving the premises and to ensure pollution is minimised - these terms are not definitive and this distinction is significant since OI can continue to comply with its statutory obligations even though some nuisance may be emitted from the land* → *in regard to noise, the standard requires the indicative noise level for the noise source to be determined with reference to the land uses promoted by the Development Plan, the area currently being within a zoned industrial context - if the DPA*	*the DPA be approved and subsequent development occurs on the affected area.* • *However, with proper planning and design of any future developments the risk can be mitigated.* • *The EPA does not consider that approval of the DPA would automatically lead to changes to the O-I licence."*	

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		proceeds, the area affected will allow for medium to high density residential land uses which will directly influence the determination of the indicative noise level being no longer premised on industrial uses but taking account of newly encroaching residential uses to the cost of OI's potential environmental performance → *the rezoning that the DPA facilitates will create the potential for conflict and complaint by causing incompatible land use change and by relying on the regulatory regimes to resolve this tension which is contrary to basic planning principles*		
		25.35 OI highlights the environmental management and economic implications the proposed rezoning to allow dense residential development near to its boundaries will have on the OI facility, and the threat that the plant could become unviable if either additional environmental management requirements are dictated, at high cost, or the plant's	25.35 Council sought additional advice from the EPA on the implications of the existing licence and conditions for OI upon development of the affected area. The EPA indicated that: • *"investigations into the potential impacts of air and noise emissions have been undertaken and the EPA's review and assessment of those investigations gives*	25.35 Refer to row 25.10 in relation to further amendments proposed.

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		operations or efficiency are required to be curtailed due to complaints with a consequent critical impact upon the sustainability of current and future functions of the facility *the experience of OI nationally is that an increase in the number of dwellings located close to its plants inevitably generates a heightened level of complaints and fuels increased environmental management costs, which would be prejudicial to OI's operations* *The DPA proposals for residential rezoning will encourage this cycle and will thereby compromise the on-going viability of the OI facility*	*us some level of confidence that they are either not likely to be an issue (in the case of air quality) or could be addressed through careful application of planning policy and design and engineering solutions (in the case of noise).* • *Whilst the modelling gives a good understanding of the potential impacts of air and noise emissions, there is no guarantee that there wouldn't be complaints from future residents should the DPA be approved and subsequent development occurs on the affected area.* • *However, with proper planning and design of any future developments the risk can be mitigated.* • *The EPA does not consider that approval of the DPA would automatically lead to changes to the O-I licence."*	
26.	Tracey Nearmy 23 Mundulla Street, Kilkenny	*26.1 Raised concerns with the proposed building height and suggests a maximum of 2-storeys north of Pinda Street. Concerned the building heights proposed will cause overlooking issues, clash with the heritage nature of the area, noise/light pollution and devaluing surrounding properties.*	26.1 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy	26.1 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

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			amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone. Issues relating to light spill, overshadowing and overlooking adjoining properties is acknowledged. The Development Plan contains existing policies that address building siting and design, building envelopes and staggered setbacks, screening techniques and noise attenuation measures that are able to moderate these types of interface impacts. In relation to land values, courts have consistently confirmed that the effect on property values is not a direct valid planning issue. There are many elements of a non-planning nature that would influence value.	
		26.2 *Concerns raised regarding car parking in the locality.*	26.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular	26.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		26.3 Concerns raised with the large increase in traffic on narrow roads will have a greater potential to have crashes occur and for roads to be gridlocked during peak traffic hours. Indicated the increase in traffic will be less safe for cycling and walking activities which conflicts with the area's promotion of the new greenway for recreation use.	26.3 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected	26.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

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			to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. The draft DPA proposes the extension of the existing greenway within the draft DPA affected area parallel to the railway line to encourage safe and convenient movement for pedestrians and cyclists.	
		26.4 *Concerns raised regarding the environmental impact this development will cause. The development should be low impact, sustainable and include green spaces within and around it as well as stormwater run-off catchments, rainwater catchments and recycling and permeable paving.*	26.4 Environmental concerns are noted. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to existing services and current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) to protect resources beyond the metropolitan area.	26.4 Amend the draft DPA, to address the desire for additional public open space.

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			While a higher density is proposed in the draft DPA, amendments are proposed for additional public open space in the draft DPA. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. The detailed design of the public open space is however not a matter that the draft DPA can address (other than the desired approximate location and size). This ordinarily occurs at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks. The zone policy in the draft DPA also addresses the need for future development to incorporate Water Sensitive Urban Design systems. No additional policy amendments in relation to stormwater management are considered necessary in the draft DPA.	
		26.5 *Suggests the construction of a new underpass/overpass on the railway line crossing on David Terrace as it is predicted to increase to 20,000 passes per day with the new development.*	26.5 A revised Traffic Impact Assessment has been undertaken based on the issues raised in the consultation process based on a reduce yield. The findings indicate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity in the surrounding local road network to cater for the additional traffic based on the draft amended policy.	26.5 Refer to response in Row 26.3.
27.	Deanna Howland	27.1 *Supports the draft DPA rezoning proposal.*	27.1 Support for the draft DPA noted.	27.1 No further amendments proposed to the draft DPA.

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	10 Myponga Terrace, Kilkenny			
28.	Krystle & Jarrod Duncan Cavendish Street, West Croydon	*28.1 Concerns raised that the significant increase in volume of residents is not sustainable in the area due to the current infrastructure.*	28.1 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage.	28.1 No further amendments proposed to the draft DPA.
		28.2 Concerns regarding impacts to the existing character of the current surrounding dwellings.	28.2 With respect to character, the draft DPA affected area is currently located in an Urban Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings.	28.2 Amend the draft DPA policy to reduce desired built form to address concerns received through the consultation process.

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			Notwithstanding a proposed new zoning, development over these sites future development will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		28.3 Concerns raised regarding insufficient car parking for the volume of new residents and their visitors.	28.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car	28.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			parking requirements for future development. Refer to comments in Row 1.3.	concerns received through the consultation process.
		28.4 Concerns raised in the submission regarding a significant increase in traffic. Indicated there is already an issue with parking and traffic difficulty navigating the streets due to the narrow nature of the streets, some homes without driveways who use the streets for permanent parking and cars generally parking on the street.	28.4 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic	28.4 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		28.5 Indicated that MJ McInerney Reserve is not a sufficient green space for the new volume of residents as it is currently at capacity during week days and beyond capacity on weekends.	28.5 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan.	28.6 Amend the draft DPA, to address the desire for additional public open space.

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			The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		28.6 Suggests a high density rezoning may result in adverse amenity issues such as litter, anti-social behaviour, graffiti and vandalism.	28.7 With regards to anti-social issues this matter cannot be assumed to be attributed directly to a higher density of living and is not considered a planning matter to address in the scope of the draft DPA.	28.6 No further amendments proposed to the draft DPA.
29.	Nick Pappas 1/40 Wilpena Terrace, Kilkenny	*29.1 Supports the rezoning however has raised some concerns.*	29.1 Support for a rezoning subject to concerns raised is noted.	29.1 No further amendments proposed to the draft DPA.
		29.2 Concerns regarding the proposed dwelling yield.	29.2 Locational factors for higher densities (eg inner city, close to public transport and services) are major factors influencing density/housing options for the affected area within the draft DPA. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with	29.2 Amend the draft DPA policy relating to building heights, desired dwelling yield to address concerns raised through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received.	
		29.3 Concerns with increased traffic in the area.	29.3 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following:	29.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		29.4 Seeking single to double storey apartment living across the development area would be more appropriate.	29.4 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services.	29.4 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		29.5 Concerns raised with car parking availability and impacts to on street car parks and sufficient access for emergency services or waste collection vehicles as the streets are already narrow.	29.5 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. In relation to sufficient access for emergency services or waste collection vehicles Council has not received any advice from Emergency Services or it's waste contractor that they are having difficulties with access under the existing parking arrangements and we would be happy to respond to those service providers	29.5 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			or indeed any residents if they seek Council intervention to address issues relating to parking congestion. As part of the consultation process for the draft DPA the Metropolitan Fire Services and State Emergency Services were also consulted.	
		29.6 Suggested the increase of traffic loads due to the proposed density will cause continual degradation of the surrounding road network.	29.6 The revised TIA has concluded that the surrounding local road network is expected to remain below 1,500 vehicles per day and on this basis the revised policy scenario presents a reduced impact on the local road network. The revised TIA concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic.	29.6 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic volumes.
		29.7 Concerns raised regarding the existing water pressures across the suburb of Kilkenny.	29.7 The infrastructure analysis conducted as part of the draft DPA investigations concluded that the existing potable water supply was ample and had spare capacity to accommodate the extra demand. Future upgrades to water supply are dependent upon the future development of the draft DPA site.	29.7 No further amendments proposed to the draft DPA.
		29.8 Suggests the aesthetics of a high-density development will mimic a 'ghetto' environment which can lead to gangs, violence drug and alcohol use	29.8 With regards to anti-social issues this matter cannot be assumed to be attributed directly to a higher density of living and is not considered a planning matter to address in the scope of the draft DPA.	29.8 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		in the park lands and in front of the train station.		
30.	Erasmia Pappas 1/40 Wilpena Terrace, Kilkenny	*30.1 Comments are identical as above (Refer to Submission/Row 29).*	30.1 Refer to comments in Row 29	30.1 Refer to responses in Row 29
31.	Con Pappas 82 Sutherland, Ferryden Park	*31.1 Comments are identical as above (Refer to Submission/Row 29).*	31.1 Refer to comments in Row 29	29.2 Refer to responses in Row 29
32.	Nicholas Folland 19A Tarcowie Street, Kilkenny	*32.1 Supportive of utilising the former Bianco site but raises concerns on the proposed policy.*	32.1 Noted.	32.1 No further amendments proposed to the draft DPA.
		32.2 Increase traffic concerns raised. Suggested the traffic impact study is highly inadequate and doesn't recognise local traffic conditions and driver behaviours. Suggests the increases in traffic will create dangerous conditions for pedestrians and drivers.	32.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised	32.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		32.3 *Concerns raised with parking for the proposed land uses including retail and commercial uses. Suggests street parking is already limited and many homes have no off-street parking which causes major inconveniences for locals.*	32.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car	32.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			parking requirements for future development. Refer to comments in Row 1.3.	address the traffic impact concerns received through the consultation process.
		32.4 Concerned more people may drive and park at the train station to create more street congestion.	32.4 The Department for Infrastructure and Transport currently does not provide a formal park 'n' ride facility at Kilkenny Station to attract people outside of the immediate locality to drive to the Station to catch a train to the City. While some commuters may choose to drive to the Station and park in the available parking spaces near the Station, the draft DPA site is not expected to contribute to commuter parking demand near the Station as new residents would reside within walking distance of the Station.	32.4 No further amendments proposed to the draft DPA.
		32.5 Concerns raised that the MJ McInerney Reserve does not have the capacity to accommodate a much higher level and there are very few other spaces within the immediate area. *Considers greening should be continued along Aroona Road and Port Road.*	32.5 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a	32.5 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy. The Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. Suggestions for increased street tree planting on Port Road and Aroona Road are acknowledged however, these areas are outside the scope of the draft DPA affected area. Future consideration for street tree planting in these locations will be subject to Council's on-going asset management review, prioritisation and budgeting processes.	
		32.6 Suggests lighting, road surfaces and footpath would need updating to cope with the proposal of a large scale.	32.6 These matters are outside the scope of the draft DPA. Ongoing infrastructure upgrades in the area are subject to Council's on-going review, prioritisation and budgeting processes.	32.6 No further amendments proposed to the draft DPA.
		32.7 The current proposal gives no indication of the desire to enhance the neighbourhood and add to the sense of place through innovative contemporary architecture that inspires better living and contributes to the community.	32.7 Comments noted. The draft DPA in its policy supports a high amenity public realm and pedestrian environment that will be achieved by landscaping, surface treatments, street furniture and building design.	32.7 No further amendments proposed to the draft DPA.
		32.8 Suggests the design of future development should enhance the neighbourhood.	32.8 The draft DPA affected area is currently located in an Employment Zone and not in the	32.8 Amend policy relating to the proposed built form to further improve the transition of scale

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites future development will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	adjacent to the draft DPA affected area.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
33.	Aleksandra Petrovic 4 Sackville Street, West Croydon	*33.1 Fully supports a redevelopment of the former Bianco site however concerned with the 500 dwelling yield*	33.1 Locational factors for higher densities (eg inner city, close to public transport and services) are major factors influencing density/housing options for the affected area within the draft DPA. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage. Notwithstanding the above rationale, in light of the review of submissions received an	33.1 Amend the draft DPA policy relating to building heights, desired dwelling yield and commercial/retail floor area to address concerns raised through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network.	
		33.2 Concerns raised with car parking in the locality.	33.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	32.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		33.3 Seeking green space to be included in the proposal.	33.3 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space	33.3 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		33.4 Concerns with increase in traffic congestion that would be created in the existing narrow street network.	33.4 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised	33.4 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		33.5 Queried how waste management will be handled.	33.5 Waste management will be handled in accordance with waste management plans produced during the development assessment stage for future individual developments. In relation to sufficient access for waste collection vehicles Council has not received any advice from its waste contractor that they are having difficulties with access under the existing	33.5 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			parking arrangements and we would be happy to respond to those service providers or indeed any residents if they seek Council intervention to address issues relating to parking congestion.	
		33.6 Queried how existing essential infrastructure will cope with the extra residents living in the area.	33.6 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage.	33.6 No further amendments proposed to the draft DPA.
34.	Danka Markovic 6 Sackville Street, West Croydon	*34.1 Opposes the proposal and raises the following concerns. Considers the increase in traffic unacceptable as Kilkenny Road and David Terrace are already extremely congested.*	34.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic	34.1 Amend desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		34.2 Concerned that MJ McInerney Reserve is not an adequate green space to cater for the proposal.	34.2 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	34.2 Amend the draft DPA, to address the desire for additional public open space.
		34.3 Concerns raised with car parking in the locality. Indicated that the removal of car parks at the Reserve after the	34.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential	34.3 While no further amendments are proposed to increase off-street car parking ratios for

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		update has led to park visitors parking along Sackville Street which was once a quiet street. Considers the proposal will intensify these Reserve parking issues and further congest Sackville Street.	areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. The draft DPA site is not expected to contribute to commuter parking demand near the existing reserve as new residents would reside within walking distance of the reserve.	residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
35.	Vinka Petrovic 4 Sackville Street, West Croydon	35.1 *Comments are identical as above (Refer to Submission/Row 33).*	35.1 Refer to comments in Row 33	35.1 Refer to responses in Row 33.
36.	Vlado Petrovic 4 Sackville Street, West Croydon	*36.1 Comments are identical as above (Refer to Submission/Row 33).*	*36.1* Refer to comments in Row 33.	*36.1* Refer to responses in Row 33.
37.	Lanka Joksimovic 2 Sackville Street, West Croydon	*37.1 Comments are identical as above (Refer to Submission/Row 33).*	*37.1* Refer to comments in Row 33	37.1 Refer to responses in Row 33.
38.	Radomir Joksimovic 2 Sackville Street, West Croydon	*38.1 Comments are identical as above (Refer to Submission/Row 33).*	*38.1* Refer to comments in Row 33	38.1 Refer to responses in Row 33.
39.	Anca Pop	*39.1 Comments are almost identical as above (Refer to Submission/Row 19).*	39.1 Refer to comments in Row 19.	39.2 Refer to responses in Row 19.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
	17 Heading Street, West Croydon			
40.	Kelly Dann 25 Wilpena Terrace, Kilkenny	*40.1 Supports a redevelopment of the former Bianco site however objects to the size and scale of the proposal and believes that assumptions made about its impact are understated.*	40.1 Comments noted.	40.1 No further amendments proposed to the draft DPA.
		40.2 Indicated there is severe peak-hour traffic congestion in the immediate streets no and entering Kilkenny Road from Tarcowie, Mundulla and Pinda streets during peak-hour is already problematic. Indicated that the surrounding streets are too narrow to support a large influx of vehicles, let alone on-street parking. The safety of residents due to increased traffic needs to be considered.	40.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal).	40.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		40.3 Raised concerns with allocated car parking spaces (1.5 spaces per proposed dwelling) would be absorbed into the existing infrastructure (railway line) and existing residents should not have to pay for permits for parking where new development is unable to cater to the new residents' parking needs.	40.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. With regards to permit parking for existing residents this matter is beyond the scope of the draft DPA.	40.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		40.4 Concerns raised on the impact of existing services in the area.	40.4 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage.	40.4 No further amendments proposed to the draft DPA.

		40.5 Considers the integrity of the existing heritage contributions in Kilkenny will be negatively impacted if the proposed future development is not sympathetic with existing structures. Indicated that large scale developments (over 3 storeys) do not fit in with the surrounding built form aesthetic.	40.5 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites future development will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. With regards to building heights, following submissions received a review to modify building heights has been considered and	40.5 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

			resulted in proposed policy amendments to the draft DPA including: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five storeys as originally consulted as part of the draft DPA. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area. The draft DPA also proposes policy for a single storey height within 7m of the front boundary adjacent to Mundulla Street and two storeys thereafter.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		40.6 Decrease in the value of existing properties in the area raised as a concern.	40.6 In relation to land values, courts have consistently confirmed that the effect on property values is not a direct valid planning issue. There are many elements of a non-planning nature that would influence value.	40.6 No further amendments proposed to the draft DPA.
		40.7 Considers more community consultation is needed.	40.7 The draft DPA underwent a comprehensive statutory consultation process for eight weeks. The consultation process involved a mailout of 868 letters to property owners and occupants within and adjacent to the draft DPA Affected Area with an accompanying information brochure, seeking their input. The consultation process also involved: • A Government Gazette notice and formal notices in the Advertiser and Messenger newspapers. • A 'yoursay' web page with information brochure, link to the draft DPA, the ability to ask questions and an online submission option accessed through Council's web site. • Hard copies of the draft DPA and information brochures provided at all Council libraries and the Civic Centre as well as a display board at the Civic Centre.	40.7 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• A Public Meeting was also held to give persons a further opportunity to provide a verbal submission to Council. There were 405 'unique visitors' on the 'yoursay' web page during the course of the consultation period. Forty-seven (47) submissions were lodged directly on the site and 38 visitors have subscribed to follow the project. A community briefing session was also arranged by Kilkenny residents on 3 March 2020 at the Kilkenny Community Centre and was attended by Council staff by invitation. Council staff outlined key aspects of the draft DPA policy and answered questions to assist informing the community in preparation of their submissions on the draft DPA.	
41.	Brenton Culshaw 10 Arkaba Road, Kilkenny	*41.1 Supportive of a reuse of the proposed site.*	41.1 Noted.	41.1 No further amendments proposed to the draft DPA.
		41.2 Traffic congestion concerns raised. Indicated that surrounding streets except for Wilpena Terrace are narrow, and the bin truck often has trouble getting through.	41.2 While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged.	41.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		Suggested Pinda Street should be used for access and egress with signalised entry that is synchronised with the existing traffic and railway crossing signals. *Suggested the southern ends of Arkaba Road and Wilpena Terrace be closed or made one way to encourage controlled access.*	As a result of the traffic issues raised through the consultation process additional investigations were undertaken based on reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space. A revised TIA was undertaken to understand the anticipated traffic volumes and impacts to the surround local road network based on a reduced dwelling yield of around 300 dwellings and a reduction in potential commercial and retail floor area. The revised TIA has concluded that: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. In relation to reports of insufficient access for waste collection vehicles, Council has not received any advice from its waste contractor that they are having difficulties with access under the existing parking arrangements and we would be happy to respond to those service providers or indeed any residents if they seek Council intervention to address issues relating to parking congestion. In relation to Pinda Street the traffic investigations identified this street for access and egress. However, DPTI/DIT has not imposed a requirement for this access to be signalised and instead is likely to require that movements at the intersection be restricted to left-in and left-out. The suggestion to close the southern ends of Wilpena Terrace and Arkaba Road has not	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			been considered as part of this draft DPA. Wilpena Terrace, designed as a relatively wide local collector street, with travel lanes in each direction that are unobstructed by parking, is regarded as having sufficient capacity to cater for the additional traffic volumes associated with the draft DPA site. Likewise, the local streets between Wilpena Terrace and Aroona Road currently typically carry less than 300 vehicles per day and are regarded as having sufficient capacity to accommodate the additional traffic volumes generated by the development, which will typically be less than 100 vehicles per day in these streets. The closure of southern sections of Wilpena Terrace and Arkaba Road and redirection of all draft DPA site traffic to the intersection of David Terrace and Pinda Street is likely to significantly impact the function of this arterial intersection and therefore closures and one-way restrictions in the local streets surrounding the site are not regarded as satisfactory solutions.	
		41.3 Off-street car parking concerns raised indicating that a number of Wilpena Terrace homes only have on-street parking. *Indicated that many cars park in side streets near the Railway Station to*	41.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing	41.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		access the rail services, thus competing with residents for available parks. *Indicated that on-street parking needs also need to consider the demand of the Community Hall, Conchetti Centre and Buddhist Temple.*	policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. In relation to the railway station, the Department for Infrastructure and Transport currently does not provide a formal park 'n' ride facility at Kilkenny Station to attract people outside of the immediate locality to drive to the Station to catch a train to the City. While some commuters may choose to drive to the Station and park in the available parking spaces near the Station, the draft DPA site is not expected to contribute to commuter parking demand near the Station as new residents would reside within walking distance of the Station. Consideration of parking demand for the Community Hall, Conchetti Centre and Buddhist Temple are outside the scope of the draft DPA. The affected draft DPA area will retain the same car parking standard that applies to the balance of the City for residential land uses.	commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		41.4 Issues of overlooking raised into private open space of surrounding residential properties.	41.4 Issues relating to overlooking adjoining properties is acknowledged. The Development Plan contains existing policies that address building siting and design, building envelopes and staggered setbacks, screening techniques	41.4 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

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			measures that are able to moderate this interface impacts. In relation to building heights following a review of the submissions received, the following amendments to the draft DPA are proposed: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five storeys as originally consulted as part of the draft DPA. The proposed reduction in built form is considered appropriate to improve the	

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			transition between the draft DPA Affected Area and the adjacent residential area.	
		41.5 Seeking additional green space in the proposed development.	41.5 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider	41.5 Amend the draft DPA, to address the desire for additional public open space.

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			existing Development Plan policy as well as the proposed draft policy.	
42.	Tanja Radjenovic 8 Sackville Street, West Croydon	*42.1 Suggests that 500 new homes are far too many for the area and considers around 200-300 would be more acceptable.*	42.1 In light of the review of submissions received an amended policy scenario is proposed to reduce the potential dwelling yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network.	42.1 Amend the draft DPA policy relating to building heights, desired dwelling yield and commercial/retail floor area to address concerns raised through the consultation process.
		42.2 Concerns raised with car parking for new dwelling. Indicated that the current on-street parking situation around the MJ McInerney Reserve is problematic and leads to issues when exiting and entering houses on Sackville St.	42.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	42.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		42.3 Traffic congestion raised on David Terrace.	42.3 The draft DPA traffic investigations considered the intersection functions along David Terrace and within the affected area with the proposed additional volumes (proposed during consultation) and the advice indicated that "*additional traffic volumes at the Mundulla Street/David Terrace intersection will increase*	42.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

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			queues in the channelised right turn lane on David Terrace (for vehicles waiting to turn right) but remain within the capacity of the existing channelised turning lane (even with additional traffic volumes diverted from right turn restrictions at the Pinda Street intersection)." While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following:	

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			• 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		42.4 Indicated that the existing reserve should not be considered as new development's green space.	42.4 Comments noted. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a	42.4 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		42.5 Designated parking for potential retail shop in heritage building.	42.5 The draft DPA policy seeks non-residential land uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses has been	42.5 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			amended to also reduce the potential traffic volumes and policy proposed to guide the location of non-residential land uses adjacent to David Terrace and east (adjacent to Wilpena Terrace). The Development Plan provides off-street carparking requirements for retail land uses. The draft DPA investigations highlighted the car parking ratio in this location requires a minimum of 3 spaces per 100m² of gross leasable floor area reflective of the proximity and accessibility of the affected area to frequent public transport (Kilkenny railway station).	
		42.6 Concerns raised with existing services and queried whether services would be upgraded?	42.6 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage.	42.6 No further amendments proposed to the draft DPA.

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43.	Sue Moroney 81 Alfred Road, West Croydon	*43.1 Concerns raised regarding increase in traffic. Indicated that the local streets are already unsafe being narrow and congested and local residents' cars are already comprised and drivers need to be very cautious and drive very slowly to avoid collisions. Concerned the increase in traffic will impact on the safety of children and cyclists, especially when crossing the nearby streets around MJ McInerney Reserve.*	43.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area.	43.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		43.2 Environmental concerns raised as an issue due to insensitive design e.g. dark bricks/roofs or limited green spaces leading to significant heat islands.	43.2 Environmental concerns are noted. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to existing services and current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) to protect resources beyond the metropolitan area. While a higher density is proposed, amendments are proposed for additional public open space in the draft DPA. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the	43.2 No further proposed amendments to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. Council's Development Plan also contains energy efficiency policy in the General Section. While the policy stops short of desired finishes the policy does desire development be appropriately sited and designed to maximise north facing sun, and roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			potential for stormwater harvesting through various methods including storing in tanks.	
		43.3 Seeking greater public open space.	43.3 This and numerous other submissions have argued for a greater provision and spread of public open. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full physical contribution. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	43.3 Amend the draft DPA, to address the desire for additional public open space.
		43.4 Seeking the established historical appearance be incorporated in the design.	43.4 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments.	43.4 No further amendments proposed to the draft DPA.

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			The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
44.	Petro Thomas 2 Shearer Street, Kilkenny	*44.1 Supportive of a redevelopment of the former Bianco site but raises some issues.*	44.1 Noted.	44.1 No further proposed amendments to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		44.2 Supports a rezoning of the land to a Suburban Activity Node Zone (Mixed Use)	44.2 Noted.	44.2 No further proposed amendments to the draft DPA.
		44.3 Concerned with the maximum building height of 5 storeys and suggest 2 or 3 storeys more suitable.	44.3 The proposed height limits applying to this area have been derived on the basis of a range of urban design and amenity considerations. Furthermore, the proposed height limits were proposed to achieve reasonable development yields and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	44.3 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.
		44.4 Supportive of 2 storeys along Mundulla Street for a proposed setback of 9.5 metres.	44.4 Noted.	44.4 No further proposed amendments to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		44.5 Supportive of non-residential development to service the needs of the local area concentrated along David Terrace and Wilpena Terrace.	44.5 Noted. The draft DPA policy seeks uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes and further policy proposed to guide the location of non-residential land uses adjacent to David Terrace and to Wilpena Terrace.	44.5 Amend the draft DPA policy to reduce desired commercial/retail floor areas.
		44.6 Supportive of the proposed Noise and Air Emissions Overlay and Affordable Housing Overlay policies.	44.6 Noted.	44.6 No further proposed amendments to the draft DPA.
		44.7 Supportive of policy desiring pedestrian connections to MJ McInerney Reserve and the station.	44.7 Noted	44.7 No further proposed amendments to the draft DPA.
		44.8 Supportive of policy to encourage the location of the greenway through the site adjacent to the railway corridor.	44.8 Noted.	44.8 No further proposed amendments to the draft DPA.
		44.9 Concerns raised with the demand for on street car parking.	44.9 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car	44.9 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to

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			parking requirements for future development. Refer to comments in Row 1.3.	address the traffic impact concerns received through the consultation process.
45.	Kimberly Kingsborough 48 Day Terrace, West Croydon	*45.1 Supports a development of the Bianco site in principle, however, raises several concerns.*	45.1 Support in principle for a redevelopment of the former Bianco site is noted.	45.1 No further proposed amendments to the draft DPA.
		45.2 Concerns with increase in local traffic on surrounding streets causing congestion, noise and air pollution.	45.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal).	45.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

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			• The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. The reduced vehicle activity initiated by the proposed policy amendments is unlikely to significantly increase pollution that impairs air quality of the locality.	
		45.3 Seeking additional green space to accommodate the recreation needs through significant increase in population and to offset the significant urban heat created by such a high density of living.	45.3 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for	45.3 Amend the draft DPA, to address the desire for additional public open space.

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			a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		45.4 Lack of adequate additional parking to accommodate occupants, visitors, staff and customers of the new dwellings and commercial businesses.	45.4 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	45.4 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			With regards to commercial land uses the draft DPA policy seeks non-residential land uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes and policy proposed to guide the location of non-residential land uses adjacent to David Terrace and east (adjacent to Wilpena Terrace). The Development Plan provides off-street carparking requirements for retail land uses. The draft DPA investigations highlighted the car parking ratio in this location requires a minimum of 3 spaces per 100m² of gross leasable floor area reflective of the proximity and accessibility of the affected area to frequent public transport (Kilkenny railway station).	
		45.5 Concerns raised with the proposed height of proposed dwellings not in keeping with the surrounding suburbs.	45.5 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services.	45.5 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone.	
		45.6 Queried impacts of additional population on local services including schools and health facilities.	45.6 The provision of medical and education facilities and services is managed by private operators and the State Government based on the demand pressures over larger catchments than the draft DPA area alone. The Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the proposed policies. No submission was received by the Department.	45.6 No further amendments proposed to the draft DPA.
		45.7 Raised two opportunities for the development: • *World class eco-friendly design and build to reduce our city and citizens impact on the environment.* • *Retail and commercial opportunities should be in keeping with the*	45.7 Environmental matters are noted. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to existing services and current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the	45.7 No further amendments proposed to the draft DPA.

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		existing culture of the surrounding areas. Vacant spaces should be prioritised for local independent businesses. Local artists should be used to enhance the visual appeal of buildings and streetscape	South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) to protect resources beyond the metropolitan area. While a higher density is proposed, amendments are proposed for additional public open space in the draft DPA. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to	

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			provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies	

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			in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks. Council's Development Plan also contains energy efficiency policy in the General Section. While the policy stops short of desired finishes the policy does desire development be appropriately sited and designed to maximise north facing sun, and roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells. With regards to retail/commercial opportunities, the draft DPA envisages a mixed-use zone and proposes policy which desires small-scale commercial and retail development that serves only the day-to-day needs of the local community. The proposed floor areas have been amended following the consultation process to reduce the anticipated traffic volumes in the area. In terms of the use of local artists to enhance the appeal of future non-residential buildings this is a matter for the future land owners of these sites to consider.	

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46.	Rhiannon Lucas 33 Yallum Terrace, Kilkenny	*46.1 Not opposed to a development of the site but concerned with external impacts in particular concerned with the increase in traffic that would make the small, already congested side streets even more dangerous.*	46.1 Comments noted. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area.	46.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		46.2 Concerns raised that the proposal assumes reliance on and demand for the train and public transport due to location which does not automatically mean residents will not have vehicles. Indicated most people don't work in the city, there are no regular bus services along David Terrace and even to use the local shopping precinct a car would be required.	46.2 Locational factors for higher densities (eg inner city, close to public transport and services) are major factors influencing density/housing options for the affected area within the draft DPA. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017). The draft DPA acknowledges that not all future residents will use the adjacent public transport services and hence future development will be required to provide off-street car parking.	46.2 No further amendments proposed to the draft DPA.
		46.3 Concerns that the proposed limited car parking per dwelling is inadequate. This shortfall places more demand on street parking which is already limited.	46.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the	46.3 While no further amendments are proposed to increase off-street car parking ratios for residential development,

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		The need for parking for both residents and visitors has been demonstrated in other developments including New Port, St Clair and Brompton of which streets are congested and difficult to navigate due to over population and lack of allocated park	number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		46.4 Indicated that the lack of green space within the development will put further demand on the MJ McInerney Reserve which is an extremely popular area since its upgrade. The upgrade included reducing the car parking available for visitors which in turn has significantly increased the street traffic around the Reserve.	46.4 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages	46.4 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
47.	Steve Rodda Aroona Road, Kilkenny	*47.1 Concerns regarding increase in traffic congestion. Indicated the existing busy, narrow streets adjacent the proposed site will not easily cope with so many extra cars, especially at peak times, including school traffic.*	47.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles	47.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		47.2 *Seeking a reduced development potential less than 100-150 dwellings. Cited examples of large-scale developments that are now underutilised as they are not highly sought such as Woodville West. Questioned the need for large development when other areas of housing remain underutilised (Woodville West, St Clair, West etc.*	47.2 The proposed density for the DPA site has been revised post consultation and lowered to potential to around 300 dwellings address traffic concerns raised through the consultation process as detailed above. The proposed density is considered appropriate and aligns with the State's 30-Year Plan for Greater Adelaide. The site presents an opportunity for higher residential densities to take advantage of its location adjacent to a train station. A lower density in this location would not be consistent with the Government's strategic planning policies and is considered an underutilisation of the site given its location.	47.2 Amend the draft DPA policy to reduce desired dwelling yield and building height to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
48.	Lionel Edwards and Maureen Gallagher 90 Day Terrace, West Croydon	*48.1 Generally supports a rezoning however, several matters could be addressed better.*	48.1 General support for a rezoning on the affected area noted.	48.1 No further amendments proposed to the draft DPA.
		48.2 Considers the proposed high density living, in particular the 4 to 5 storey dwellings is of a scale that would change the nature of the area and upset the increasing gentrification of local suburbs.	48.2 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone.	48.2 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.
		48.3 Seeking more green space within the redeveloped area. Indicated that MJ McInerney Reserve should not be used as a garden space for dense blocks of apartments as it would lead to a rapid overcrowding of the reserve.	48.3 The comments and justification on the need for additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision and spread of public open.	48.3 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		Questioned what effect would limited green space have on local heat maps?	The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full physical contribution. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy. In terms of the query regarding heat maps, it should be noted the land currently located in an Urban Employment Zone is largely denude of vegetation now. A rezoning to facilitate a mix of residential and some commercial land uses provides opportunity to increase greening over the draft DPA affected area to what is currently there through private open space and potential new public open spaces (the desired greenway and proposed additional reserve area) including potential new road	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			system, providing opportunity for the inclusion of street trees.	
		48.4 Traffic issues raised that impacting the locality. Concerns with more residents and visitors will add more vehicles to the existing parking demand. Indicated that there are already issues with parked cars and traffic congestion. Concerns raised with emergency vehicles and garbage removal vehicles navigating through narrow and congested roads.	48.4 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic	48.4 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. In relation to reports of insufficient access for waste collection vehicles, Council has not received any advice from its waste contractor that they are having difficulties with access under the existing parking arrangements and we would be happy to respond to those	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			service providers or indeed any residents if they seek Council intervention to address issues relating to parking congestion.	
		48.5 Suggests 5 storey buildings should not be included in the proposal, rather low to medium residential development.	48.5 Comments noted. Refer to comments in row 48.2.	48.5 Refer response in Row 48.2.
		48.6 Further consideration sought in the nature of any commercial enterprise within the development. Considers large retail outlets not required but supports smaller services such as a coffee shop or something with a similar community focus.	48.6 Comments are noted. The draft DPA envisages a mixed-use zone and proposes policy which desires small-scale commercial and retail development that serves only the day-to-day needs of the local community. The proposed floor areas have been amended following the consultation process to reduce the anticipated traffic volumes in the area.	48.6 Amendments to policy to reduce the floor areas for potential retail / commercial land uses.
		48.7 Considers a medium to high density proposal is not compatible with the nature of older Kilkenny and West Croydon suburbs and contrast between new developments without aesthetic considerations.	48.7 A reduction in built form is proposed (refer to Row 48.2) and is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area. The draft DPA affected area is currently located in an Urban Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments.	48.7 Amend policy to the draft DPA to reflect the proposed reduction in building heights.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites future development will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		48.8 Queried what percentage of up to 500 dwellings are envisaged to be reserved for 'Affordable Housing'? and their quality of design.	48.8 The desire for affordable housing opportunities within the established metropolitan area is in line with the Council's Community Plan to provide an urban environment that is adaptive to a changing and growing City. The issue of affordable housing is also an important direction in the State Government's Strategic Plan, and the South Australian Planning Strategy (the 30-Year Plan). Government's at all levels have a social obligation to ensure all household types can be provided with opportunities to be located in areas close to public transport and other services and offer an integrated housing mix to cater for the varied needs of the community. The Affordable Housing Overlay policies are not unique to this draft DPA and already exist in the Charles Sturt Development Plan. These policies have been consistently applied to all new major rezoning development proposals across the City, which seek an increase in dwelling yield. These policies provide guidance for the provision of affordable housing for	48.9 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			developments that comprise more than 20 dwellings which is likely to be the case for the proposed draft DPA Affected Area to include a minimum of 15 per cent affordable housing unless the development is to occur in stages and it can be demonstrated that any shortfall in affordable housing from any stage of development will be accommodated in another stage or stages. The future design of these developments are required to meet the same design policy parameters as other developments.	
49.	David Mills & Jane Sage 12 Wilpena Terrace, Kilkenny	*Strongly object the draft DPA and raised several concerns.* *49.1 Indicated that the draft DPA does not include any suggested treatments to manage the change in traffic flows which will result from prohibiting right hand turning from David Terrace onto Pinda Street. The change would bring about massive impacts for traffic volumes, safety, noise level and general amenity of Mundulla St.*	49.1 Potential road treatments to manage traffic flows such as prohibiting right hand turn from David Terrace onto Pinda Street will be designed at a development assessment stage in consultation with the Department of Infrastructure and Transport as David Terrace is a Department controlled road. Such treatments may involve a medium on David Terrace. The advice indicates that such treatments are minor works that can be considered within a deed as part of any future development application for the site which triggers such a treatment.	49.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		49.2 The DPA acknowledges that traffic along Mundulla St will increase by up to 6 times the current volume which will increase the risk of accidents at the Mundulla St/Wilpena St intersection. However, there is no mention of how this is to be mitigated within the DPA.	49.2 It is acknowledged that traffic volumes in surrounding streets will increase from the current levels as a result of development of the DPA site, noting that the site is currently vacant and therefore generates virtually no traffic. This is an unusual condition that it not typical of the remainder of the local area. The DPA Report acknowledges that traffic volumes travelling through the intersection of Mundulla Street and Wilpena Terrace will increase significantly and, whist the Report does not identify the installation of new traffic controls at this intersection as a requirement of the DPA, it does include the following recommendation: *" Treatment options at the intersection of Mundulla Street and Wilpena Terrace should*	49.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			be considered in relation to the existing crash history, anticipated additional traffic volumes and local pedestrian and bicycle access routes prior to determining any appropriate intersection upgrade format." At this stage the Council intends to consider new traffic controls at the intersection of Wilpena Terrace and Mundulla Street as part of the future renewal of the Wilpena Terrace road assets, which is not scheduled in the current road renewal program, but there are opportunities for this project to be brought forward in coordination with future redevelopment of the draft DPA site.	
		49.3 Many existing dwellings do not have the provision of off-street parking and community facilities at times can attract high volumes of users which places significant strain on street parking in the area. In addition, most weekday patrons of the train occupy on-street parking. The draft DPA does not adequately account for the current on-street parking shortage issues which will lead to the spread of on-street parking from the site further into neighbouring streets which do not directly interface with the site.	49.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	49.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		49.4 Suggests that draft DPA will have an effect on property values of neighbouring properties.	49.4 Comments noted however Courts have consistently confirmed that the effect on property values is not a direct valid planning issue. There are many elements of a non-planning nature that would influence value.	49.4 No further amendments proposed to the draft DPA.
		49.5 Indicated the height of the development will lead to overlooking issues.	49.5 Issues relating to overlooking adjoining properties is acknowledged. The Development Plan contains existing policies that address building siting and design, building envelopes and staggered setbacks, screening techniques measures that are able to moderate this interface impacts. In relation to building heights following a review of the submissions received, the following amendments to the draft DPA are proposed: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to Arkaba	49.5 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five storeys as originally consulted as part of the draft DPA. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		49.6 The existing businesses on the development site which contribute to the character of the area will cease to exist once any development commences on the site.	49.6 The existing businesses situated within the draft DPA affected area are able to continue operation under the legislation's existing use provisions despite any zoning change.	49.6 No further amendments proposed to the draft DPA.
		49.7 A number of community facilities in close proximity to the site may face possible closure/relocation due to perceived parking issues.	49.7 Refer to comments in Row 49.3. The policy would provide for parking generated by the proposed development on site. Additional residents within this location would likely support the provision of the services / facilities within the locality.	49.7 No further amendments proposed to the draft DPA.
		49.8 The likelihood of significant remediation activities to be undertaken on site prior to development commencing raises	49.8 Concerns in relation to contamination and future remediation are noted. The draft DPA environmental investigations identifies that in 2004 a site contamination investigation was undertaken for the former Bianco site by	49.8 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		major concerns given the proximity of nearby residences with the potential for contaminated materials to drift to the local area.	Adelaide Environmental Consulting. The investigation identified potentially contaminating activities that had been undertaken at the site and it is considered likely that there is a level of site contamination present. A further visual assessment was undertaken in 2015. The draft DPA includes policy in the Zone Desired Character statement for the Suburban Activity Node Zone to address the need for remediation to be undertaken. The Charles Sturt Development Plan also contains existing policy in the General Section to ensure site contamination matters are assessed in any future development applications. The drat DPA has also been reviewed by the Environment Protection Authority (EPA). The Agency has confirmed in their submission that site contamination issues have been suitably addressed through the draft DPA policy. Future remediation process to ensure the land is suitable for its intended land use would occur at a development application stage, which would follow this draft DPA should it be endorsed by Council and authorised by the Minister for Planning.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			With regards to future remediation of the affected area, this matter will be dealt with in accordance with an approved remediation plan, and the requirements of relevant legislation such as the *Environment Protection Act 1993*.	
		49.9 The greenway is not a form of open space and should not be used to justify the suggestion that open space requirements for the development have been met.	49.9 Public open space can include various elements that improve active and passive recreation, such as a greenway. The proposed inclusion of the greenway as a portion of public open space will assist in ensuring sufficient space is set aside for the creation of this important piece of infrastructure for the local and broader community. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown	49.9 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
50.	Tristram Lucas 33 Yallum Terrace, Kilkenny	*50.1 Concerns raised with increase in traffic creating greater congestion and safety issues.*	50.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised	50.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		50.2 Considers the proposed car parking per dwelling is inadequate. The proposal assumes reliance on and demand for the local train and public transport due to location.	50.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	50.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		50.3 Seeking more public green space.	50.3 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	50.3 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
51.	Alva Pugh 16 Yallum Terrace, Kilkenny	*51.1 The proposed 5 storey development considered too large and the proposed number of dwellings. Considers 3 storeys more suitable.*	51.1 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone. In light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received.	51.1 Amend policy to the draft DPA to reflect the proposed reduction in building heights and reduced density.
		51.2 Concerned with the increase in the number of cars the redevelopment would bring impacting narrow streets around Kilkenny. Indicated there is	51.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered	51.2 While no further amendments are proposed to increase off-street car parking ratios for residential development,

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		already traffic congestion and difficult to navigate through the streets and need for more on street car parking.	by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations	amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	
		51.3 Indicated that many streets and footpaths would need to be upgraded and repaired.	51.3 Asset maintenance of existing streets and footpaths are matters outside the scope of the draft DPA. Ongoing infrastructure upgrades in the area are subject to Council's on-going asset management review/prioritisation and budgeting processes.	51.3 No further amendments proposed to the draft DPA.
		51.4 Suggests existing schools in the area would not cope with the influx of extra children.	51.4 The provision of education facilities is managed by private operators and the State Government based on the demand pressures over larger catchments than the draft DPA area alone. The Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the proposed	51.4 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			policies. No submission was received by the Department.	
		51.5 Concerned the MJ McInerney Reserve would not cope with an influx of residents in the area.	51.5 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	51.5 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
52.	Joy Germein 4 Lincoln Street, West Croydon	*52.1 Suggest too many dwellings for the space allocated.*	52.1 Locational factors for higher residential densities (eg inner city, close to public transport and services) are major factors influencing density/housing options for the affected area within the draft DPA. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding this, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received.	52.1 Amend the draft DPA policy relating to building heights, desired dwelling yield.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		52.2 Indicated that green space should be allocated.	52.2 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	52.2 Amend the draft DPA, to address the desire for additional public open space.
		52.3 Concerns raised with increase in traffic along narrow streets.	52.3 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered	52.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in	impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			the surrounding road network to cater for the additional traffic based on the amended policy.	
		52.4 Indicated the development should be sustainable.	52.4 Comments on sustainability are noted. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to existing services and current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) to protect resources beyond the metropolitan area. The draft DPA through the consultation process, also included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are also recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted.	52.4 Amendments are proposed in the draft DPA to reduce the desired density and include further policy guidance seeking further public open space in addition to the desired greenway.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks. Council's Development Plan also contains energy efficiency policy in the General Section. While the policy stops short of desired finishes the policy does desire development be appropriately sited and designed to maximise north facing sun, and roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells.	
53.	Shannon O'Malley 18 Tarcowie Street, Kilkenny	*53.1 Generally supportive of a redevelopment of the former Bianco site for residential land uses.*	53.1 Noted.	53.1 No further amendments proposed to the draft DPA.
		53.2 Concerns raised that new development may not keep with the historical feel of Kilkenny by using materials and colours used in historical housing.	53.2 The draft DPA affected area is currently located in an Urban Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height,	53.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			siting, design, use of materials of new buildings. Notwithstanding a proposed new zoning, future development over these sites will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		53.3 Possible harm to existing heritage buildings that are close to main arterial roads in Kilkenny by the increase in traffic.	53.3 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone. The current Zone envisages industrial type land uses such as warehousing that involves the movement of large commercial/industrial vehicles. The proposed rezoning envisages	53.3 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			predominantly residential land uses with some smaller scale commercial and retail land uses. The effect of increased domestic traffic on the structural integrity of existing residential properties cannot directly be linked to the draft DPA. There are many elements of a non-planning nature that would influence structural integrity.	
		53.4 Concerns with increase in traffic impacting the area and making it unsafe for cycling and walking activities.	53.4 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal).	53.4 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. The draft DPA also proposes policy that desires that future development of the former Bianco site to accommodate the Outer Harbour Greenway immediately adjacent to the railway corridor providing a safer alternative for pedestrians and cyclist than the current the route of the Greenway along Pinda Street.	
		53.5 Concerns with traffic congestion through the proposed reduction in traffic movements at the Pinda Street and David Terrace intersection and suggestions for one-way movements in some streets.	53.5 The findings of the traffic investigations indicate that a channelised right turn lane on David Terrace into Pinda Street is not the most ideal design solution from a safety perspective due to the proximity of the railway line and the limited width of the David Terrace road reserve	53.5 Refer to response in row in 53.4 in relation to proposed policy amendments to reduce anticipated vehicle movements.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			to accommodate the turning lane without the loss of parking to the front of existing shops in this location. Instead, this will likely need to have a median placed across the junction to limit movements to left-in and left-out from Pinda Street. The modelling undertaken in the draft DPA investigations has factored this assumption. The suggestion for one-way movements in some streets is noted. Local streets between Wilpena Terrace and Aroona Road currently typically carry less than 300 vehicles per day and are regarded as having sufficient capacity to accommodate the additional traffic volumes generated by the development, which will typically be less than 100 vehicles per day in these streets. Whilst the projected additional traffic volumes are not regarded as significantly impacting the function of these streets, parking restrictions and/or traffic control intervention (such as one-way conversion) may provide some benefit in these streets. However, they are not proposed as part of this draft DPA and would be subject to further consultation with the local community on the specific advantages and disadvantages associated with those interventions.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		53.6 Car parking issues raised due to local narrow streets.	53.6 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	53.6 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		53.7 Concerns raised with environmental sustainability such as increase of sealed surfaces, air temperatures as well as stormwater management.	53.7 Environmental concerns are noted. It should be noted that a large section of the draft DPA affected area is already sealed. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to existing services and current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) to protect resources beyond the metropolitan area. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the	53.7 Amendments are proposed in the draft DPA to reduce the desired density and include policy guidance seeking further public open space in addition to the desired greenway.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks. Council's Development Plan also contains energy efficiency policy in the General Section. While the policy stops short of desired finishes the policy does desire development be appropriately sited and designed to maximise	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			north facing sun, and roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells.	
		53.8 Suggests that rainwater catchment areas need to be taken advantage of for water recycling and use within the development. Rain gardens and permeable paving should be incorporated also.	53.8 Noted. The installation of rain gardens and permeable paving will be addressed when individual development applications are received in the future should the draft DPA be authorised. Development assessment against the existing Development Plan policies, particularly against the policies within the Natural Resources module and its Water Sensitive Design sub-section, will achieve suitable engineering outcomes for managing stormwater. Also refer to comments in row 53.7.	53.8 No further amendments proposed to the draft DPA.
		53.9 Seeking greater green spaces and to not rely just on the MJ McInerney Reserve.	53.9 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a	53.9 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		53.10 The existing infrastructure such as the railway station, bus stops, streets, footpaths, rubbish bins, park, schools/early childcare services may not adequately cope with the potential increase of 54% in the total population of Kilkenny.	53.10 The Asset maintenance of existing public infrastructure eg. footpaths are matters outside the scope of the draft DPA. Ongoing infrastructure upgrades in the area are subject to on-going asset management review/prioritisation and budgeting processes for Government controlled assets and Council owned assets. The provision of education facilities is managed by private operators and the State Government based on the demand pressures over larger catchments than the draft DPA area alone. The Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the proposed	53.10 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			policies. No submission was received by the Department.	
		53.11 Concerned tall development may create wind tunnelling down the streets.	53.11 Existing Development Plan policies and provisions proposed within the draft DPA work to limit development to a scale and form that does not unreasonably dominate or overshadow nearby established residences and the public streetscape generally and minimise wind tunnelling through a graduated building height profile. Following the consultation process a review to modify building heights has also been considered and resulted in proposed policy amendments to the draft DPA. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	53.11 Amendments proposed to the draft DPA to reduce building heights graduating away from the adjacent Residential Character Zone.
		53.12 Questioned the viability of new commercial shopping within the development when they would need to compete with nearby large-scale shopping/commercial areas?	53.12 With regards to retail/commercial opportunities, the draft DPA envisages a mixed-use zone and proposes policy which desires small-scale commercial and retail development that serves only the day-to-day needs of the local community. The proposed floor areas have been amended following the consultation process to reduce the anticipated traffic volumes in the area.	53.12 Amendments proposed to reduce the proposed floor area for envisages retail and commercial land uses.

		53.13 Suggestion to build an underpass beneath the Kilkenny Road/David Terrace railway line to ease traffic congestion or Aroona Road under the railway line to ease congestion.	53.13 Suggestion noted. A revised Traffic Impact Assessment has been undertaken based on the issues raised in the consultation process based on a reduce yield. The findings indicate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity to cater for the additional traffic based on the draft amended policy. The draft DPA traffic investigations also considered the intersection functions along David Terrace and within the affected area with the proposed additional volumes (proposed during consultation) and the advice indicated that *additional traffic volumes at the Mundulla Street/David Terrace intersection will increase queues in the channelised right turn lane on David Terrace (for vehicles waiting to turn right) but remain within the capacity of the existing channelised turning lane (*even with additional traffic volumes diverted from right turn restrictions at the Pinda Street intersection*)*.	53.13 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
54.	David & Sheryl Kennedy 19 Wilpena Terrace, Kilkenny	*54.1 Generally supportive of the former Bianco site being redeveloped.*	54.1 Noted.	54.1 No further amendments proposed to the draft DPA.
		54.2 Indicated their difficulties in providing a submission on a proposal that cannot be viewed and queries whether a further opportunity will be provided to view a more detailed proposal.	54.2 Comments noted. The draft DPA process is not a development application process. A draft DPA is the process by which investigations are undertaken to consider the potential to rezone an area to facilitate a different form of development currently envisaged within the existing zone in Council's Development Plan. The DPA process is detailed within the introduction of the draft DPA. In terms of consultation the draft DPA underwent a comprehensive process for eight weeks in accordance with the statutory requirements and no further consultation is required for the draft DPA process. The consultation process involved a mailout of 868 letters to property owners and occupants within and adjacent to the draft DPA Affected Area with an accompanying information brochure, seeking their input. The consultation process also involved: • A Government Gazette notice and formal notices in the Advertiser and Messenger newspapers.	54.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• A 'yoursay' web page with information brochure, link to the draft DPA, the ability to ask questions and an online submission option accessed through Council's web site. • Hard copies of the draft DPA and information brochures provided at all Council libraries and the Civic Centre as well as a display board at the Civic Centre. • A Public Meeting was held to provide opportunity for verbal submissions to be made to Council. There were 405 'unique visitors' on the 'yoursay' web page during the course of the consultation period. Forty seven (47) submissions were lodged directly on the site and 38 visitors have subscribed to follow the project. A community briefing session was also arranged by Kilkenny residents on 3 March 2020 at the Kilkenny Community Centre and was attended by Council staff by invitation. Council staff outlined key aspects of the draft DPA policy and answered questions to assist informing the community in preparation of their submissions on the draft DPA.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		54.3 Concerns raised from increased traffic and the impact it will have on the structural integrity of existing residential properties.	54.3 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone. The current Zone envisages industrial type land uses such as warehousing that can involve the movement of large commercial/industrial vehicles. The proposed rezoning envisages predominantly residential land uses with some smaller scale commercial and retail land uses. The effect of increased domestic traffic on the structural integrity of existing residential properties is not a direct valid planning issue. There are many elements of a non-planning nature that would influence structural integrity. Notwithstanding the above, following the consultation process policy amendments are proposed to the draft DPA involving reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space, which reduces the anticipated traffic volumes from future development.	54.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		54.4 Concerns raised from the impacts of increased traffic along the local street network in relation to noise, safety, speed limits and traffic congestion. Alternative suggestions made with regards to access such as a bridge or	54.4 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased	54.4 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		underpass to connect to Aroona Road, south of the railway line.	public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised Traffic Impact Assessment concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy and therefore alternative	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			access arrangements are not considered warranted.	
		54.5 Concerns raised about car parking suggesting limited availability of on-street carparks currently within the area and the impacts that vehicles from the development have on this current parking shortage? *Concerns raised on the ability for waste management services to undertake their operations.*	54.5 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. With regard to parking congestion in local streets in the area, Council staff are happy to investigate on a needs-basis. Council has not received any advice from Emergency Services or it's waste contractor that they are having difficulties with access under the existing parking arrangements and we would be happy to respond to those service providers or indeed any residents if they seek Council intervention to address issues relating to parking congestion.	54.5 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		54.6 Overlooking issues raised and how these privacy issues will be addressed. Questioned	54.6 Issues relating to overlooking adjoining properties is acknowledged. The Development Plan contains existing policies that address	54.6 Amend policy to the draft DPA to reflect the proposed reduction in building heights to

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			building siting and design, staggered setbacks and screening techniques to moderate this potential issue. In relation to building heights following a review of the submissions received, the following amendments to the draft DPA are proposed: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five storeys as originally consulted as part of the draft DPA. The proposed reduction in built form is considered appropriate to improve the	address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			transition between the draft DPA Affected Area and the adjacent residential area. In relation to the comments regarding the Torrens Engineering site at 38-40 David Terrace Kilkenny, it should be noted that the site is not identified as a Local Heritage Place nor located within Council's Historic Conservation Area within Council's Development Plan and therefore has no heritage status. The amended policy proposes a maximum building height of two storeys over this area	
		54.7 *Concerns raised on how the new development blend into the area in order to maintain the historical feel of Kilkenny.* *Queried the opportunity to rename the suburb of Kilkenny (historical area) to be called 'Old Kilkenny' to assist in providing its own identity.* *Seeking greater consideration to the type of demographic it was likely to attract.*	54.7 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials of new buildings. Notwithstanding a proposed new zoning, future development will be required to be assessed against existing policy in the Historic Conservation Area which seeks new	54.7 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone. In relation to the proposal to change the suburb name, this matter is beyond the scope of the draft DPA process. This process is considered through State Government and if pursued through the Government, Council's support would be required, and this decision would be based on broad community consultation in the first instance. The consideration of policy amendments to the Development Plan focusses on desired land	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			uses for an area and built form eg. building heights, design etc. In relation to the consideration of demographics for the proposed future built form this is not a matter that Council can control. Local Governments have a responsibility to ensure policies are in place to encourage a range of housing choices for various household types in close proximity to existing services and public transport services to align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017).	
		54.8 Issues raised on the impacts on existing infrastructure such as • *railway station* • *bus stops* • *rubbish bins* • *schools* • *streets / footpaths* • *water* • *internet.*	54.8 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage. The Asset maintenance of existing public infrastructure eg. streets, footpaths, railway station are matters outside the scope of the	54.8 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			draft DPA. Ongoing infrastructure upgrades in the area are subject to on-going asset management review/prioritisation and budgeting processes for Government controlled assets and Council owned assets. In relation to bins/waste collection vehicles, Council has not received any advice from its waste contractor that they are having difficulties with access under the existing parking arrangements and we would be happy to respond to those service providers. Most residential developments that have street frontage utilise Council's standard 3 bin system Future developments will be assessed against existing policy contained in the Development Plan seeking designs to ensure the safe and efficient collection of waste and recycling materials. The provision of education facilities is managed by private operators and the State Government based on the demand pressures over larger catchments than the draft DPA area alone. The Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the proposed policies. No submission was received by the Department.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			With respect to internet connections the draft DPA investigations included NBN Co. advice that they will be able to supply fibre to the premises for future development.	
		54.9 Concerns raised with overshadowing and wind tunnels.	54.9 Existing Development Plan policies and provisions proposed within the draft DPA work to limit development to a scale and form that does not unreasonably dominate or overshadow nearby established residences and the public streetscape generally and minimise wind tunnelling through a graduated building height profile. Following submissions received a review to modify building heights has also been considered and resulted in proposed policy amendments to the draft DPA. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	54.9 Amendments proposed to reduce the height of built form.
		54.10 Raised issues on the impacts of sealed surfaces and stormwater run-off. Emphasised the importance of trees for greening and cooling.	54.10 Environmental concerns are noted. It should be noted that a large section of the draft DPA affected area is already sealed and void of any substantial greenery. The draft DPA through the consultation process, included policy which desires a	54.10 Amendments are proposed in the draft DPA to reduce the desired density and include policy guidance seeking further public open space in addition to the desired greenway.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		54.11 *Concerns with the extent of commercial land uses proposed and the issue of additional vehicle traffic in the local area.*	54.11 The draft DPA policy seeks non-residential land uses that will cater for the day to day needs of local residents. In response to submission concerns the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes and policy proposed to guide the location of non-residential land uses adjacent to David Terrace and east (adjacent to Wilpena Terrace).	54.11 Amend the draft DPA policy to reduce desired commercial/retail floor areas.
55.	Dave Saunders 21 Kupman Street, Kilkenny	*55.1 Concerns with the increase in traffic in the area surrounding the proposed development will cause significant congestion and safety issues.*	55.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised	55.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		55.2 Concerns with the proposed parking spaces is not sufficient and will cause further congestion.	55.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	55.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		55.3 Concerns raised on the capacity of the Kilkenny Primary School as the closest in proximity to the new development.	55.3 The provision of education facilities is managed by private operators and the State Government based on the demand pressures over larger catchments than the draft DPA area alone. The Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the proposed policies. No submission was received by the Department.	55.3 No further amendments proposed to the draft DPA.
56.	Simon Peters 18 Wilpena Terrace, Kilkenny	*56.1 Concerns with the increase in traffic in the area, disruptions in the flow of traffic. Suggested a potential train underpass at the Aroona Road section should be considered as a way of alleviating congestion.*	56.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised	56.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised Traffic Impact Assessment concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy and therefore alternative access arrangements are not considered warranted.	
		56.2 Concerns raised with the increase in the number of cars requiring on-street car parking. Considers an average of 1.25 car parks per dwelling available on-site is not sufficient.	56.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	56.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact

Sub No.	Name/Address	Submission Summary	Comment	Council Response
				concerns received through the consultation process.
		56.3 Concerns raised with the impact of the development on the historical feel of the area. Considers the potential of 500 dwellings and up to 5 storeys in height and significant retail areas are not in keeping with the heritage of the suburb and also risks affecting the value of houses in the area.	56.3 Locational factors for higher densities (eg inner city, close to public transport and services) are major factors influencing density/housing options for the affected area within the draft DPA. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300	56.3 Amend the draft DPA policy relating to building heights, desired dwelling yield and commercial/retail floor area to address concerns raised through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network A further graduation of building heights is also proposed post consultation. Following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA including: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			of five storeys as originally consulted as part of the draft DPA. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area. Comments on the value of houses is noted, however Courts have consistently confirmed that the effect on property values is not a direct valid planning issue. There are many elements of a non-planning nature that would influence value.	
57.	Scott Marshall 18 Tarcowie Street, Kilkenny	*57.1 Generally supportive of a redevelopment of the former Bianco site for residential land uses.*	*57.1* Noted.	*57.1* No further amendments proposed to the draft DPA.
		57.2 Concerns raised that new development may not keep with the historical feel of Kilkenny by using materials and colours used in historical housing.	57.2 The draft DPA affected area is currently located in an Urban Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic	57.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, future development over these sites will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		57.3 *Possible harm to existing heritage buildings that are close to main arterial roads in Kilkenny by the increase in traffic.*	57.3 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone. The current Zone envisages industrial type land uses such as warehousing that involves the movement of large commercial/industrial	57.3 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			vehicles. The proposed rezoning envisages predominantly residential land uses with some smaller scale commercial and retail land uses. The effect of increased domestic traffic on the structural integrity of existing residential properties is not a direct valid planning issue. There are many elements of a non-planning nature that would influence structural integrity.	
		57.4 Concerns with increase in traffic impacting the area and making it unsafe for cycling and walking activities.	57.4 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal).	57.4 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. The draft DPA also proposes policy that desires that future development of the former Bianco site to accommodate the Outer Harbour Greenway immediately adjacent to the railway corridor providing a safer alternative for pedestrians and cyclist than the current the route of the Greenway along Pinda Street.	
		57.5 *Concerns with traffic congestion through the proposed reduction in traffic movements at the Pinda Street and David Terrace intersection and suggestions for one-way movements in some streets.*	57.5 The findings of the traffic investigations indicate that a channelised right turn lane on David Terrace into Pinda Street is not the most ideal design solution from a safety perspective due to the proximity of the railway line and the limited width of the David Terrace road reserve	57.5 Refer to response in row in 57.4 in relation to proposed policy amendments to reduce anticipated vehicle movements.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			to accommodate the turning lane without the loss of parking to the front of existing shops in this location. Instead, this will likely need to have a median placed across the junction to limit movements to left-in and left-out from Pinda Street. The modelling undertaken in the draft DPA investigations has factored this assumption. The suggestion for one-way movements in some streets is noted. Local streets between Wilpena Terrace and Aroona Road currently typically carry less than 300 vehicles per day and are regarded as having sufficient capacity to accommodate the additional traffic volumes generated by the development, which will typically be less than 100 vehicles per day in these streets. One-way streets are likely to significantly impact the function of the road network are is not regarded as a satisfactory solution.	
		57.6 *Car parking issues raised due to local narrow streets.*	57.6 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car	57.6 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			parking requirements for future development. Refer to comments in Row 1.3.	concerns received through the consultation process.
		57.7 *Concerns raised with environmental sustainability such as increase of sealed surfaces, air temperatures as well as stormwater management.*	57.7 Environmental concerns are noted. It should be noted that a large section of the draft DPA affected area is already sealed. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to existing services and current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) to protect resources beyond the metropolitan area. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for	57.7 Amendments are proposed in the draft DPA to reduce the desired density and include further policy guidance seeking further public open space in addition to the desired greenway.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for stormwater harvesting through various methods including storing in tanks. Council's Development Plan also contains energy efficiency policy in the General Section. While the policy stops short of desired finishes the policy does desire development be appropriately sited and designed to maximise north facing sun, and roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells.	
		57.8 Suggests that rainwater catchment areas need to be taken advantage of for water recycling and use within the development. Rain gardens and	57.8 Noted. The installation of rain gardens and permeable paving will be addressed when individual development applications are received in the future should the draft DPA be authorised. Development assessment against	57.8 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		permeable paving should be incorporated also.	the existing Development Plan policies, in particular policies within the Natural Resources module and its Water Sensitive Design sub-section, will achieve suitable engineering outcomes for managing stormwater.	
		57.9 *Seeking greater green spaces and to not rely just on the MJ McInerney Reserve.*	57.9 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a	57.9 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		57.10 The existing infrastructure such as the railway station, bus stops, streets, footpaths, rubbish bins, park, schools/early childcare services may not adequately cope with the potential increase of 54% in the total population of Kilkenny.	57.10 The Asset maintenance of existing public infrastructure eg. footpaths are matters outside the scope of the draft DPA. Ongoing infrastructure upgrades in the area are subject to on-going asset management review/prioritisation and budgeting processes for Government controlled assets and Council owned assets. The provision of education facilities is managed by private operators and the State Government based on the demand pressures over larger catchments than the draft DPA area alone. The Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the proposed policies. No submission was received by the Department.	57.10 No further amendments proposed to the draft DPA.
		57.11 Concerned tall development may create wind tunnelling down the streets.	57.11 Existing Development Plan policies and provisions proposed within the draft DPA work to limit development to a scale and form that does not unreasonably dominate or overshadow nearby established residences and the public streetscape generally and minimise wind tunnelling through a graduated building height profile.	57.11 Amendments proposed to the draft DPA to reduce building heights graduating away from the adjacent Residential Character Zone.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Following the consultation process a review to modify building heights has also been considered and resulted in proposed policy amendments to the draft DPA. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		57.12 Questioned the viability of new commercial shopping within the development when they would need to compete with nearby large-scale shopping/commercial areas?	57.12 With regards to retail/commercial opportunities, the draft DPA envisages a mixed-use zone and proposes policy which desires small-scale commercial and retail development that serves only the day-to-day needs of the local community. The proposed floor areas have been amended following the consultation process to reduce the anticipated traffic volumes in the area.	57.12 Amendments proposed to reduce the proposed floor area for envisages retail and commercial land uses.

		57.13 Suggestion to build an underpass beneath the Kilkenny Road/David Terrace railway line to ease traffic congestion or Aroona Road under the railway line to ease congestion.	57.13 Suggestion noted. A revised Traffic Impact Assessment has been undertaken based on the issues raised in the consultation process based on a reduce yield. The findings indicate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity to cater for the additional traffic based on the draft amended policy. The draft DPA traffic investigations also considered the intersection functions along David Terrace and within the affected area with the proposed additional volumes (proposed during consultation) and the advice indicated that *additional traffic volumes at the Mundulla Street/David Terrace intersection will increase queues in the channelised right turn lane on David Terrace (for vehicles waiting to turn right) but remain within the capacity of the existing channelised turning lane (*even with additional traffic volumes diverted from right turn restrictions at the Pinda Street intersection*)*.	57.13 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
58.	Simon Johnson 17 Tarcowie Street, Kilkenny	*58.1 Concerns raised the proposal is too large in scale for the limited area and seeks a smaller scale development would address many of the issues that residents are concerned about.*	58.1 Locational factors for higher densities (eg inner city, close to public transport and services) are major factors influencing density/housing options for the affected area within the draft DPA. Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network.	58.1 Amend the draft DPA policy relating to building heights, desired dwelling yield and commercial/retail floor area to address concerns raised through the consultation process.
		58.2 Concerns with increase in traffic and parking demand in association with the increase in population. Suggested the traffic impact study should be expanded for the whole Kilkenny and West Croydon area as the current	58.2 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for	58.2 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		study mostly takes into account traffic out to David Terrace.	non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA, the wider local road network and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with Council's Transport Strategy for local roads such as those within this location. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		58.3 Considers the proposal will not be in keeping with the heritage feel of Kilkenny/West Croydon and will negate any Council description of a 'Heritage Area'.	58.3 The draft DPA affected area is currently located in an Urban Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites future development will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place. The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	58.3 Amend the draft DPA policy relating to building heights, desired dwelling yield to address concerns raised through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		58.4 Considers overflow parking from the development would spill onto local surrounding streets where on-street parking is currently limited. Examples of this are seen in other similar developments such as Bowden and St Clair.	58.4 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. With regard to parking congestion in local streets in the area, Council staff are happy to investigate on a needs-basis. Council would be happy to respond to any residents if they seek Council intervention to address issues relating to parking congestion.	58.4 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		58.5 Considers a priority that any future development has to contribute real and functional open space. Suggests the greenway bike/pedestrian path should not be classified as open space. Considers the proposed increase in population would overload the current facilities at the MJ McInerney Reserve.	58.5 Public open space can include various elements that improve active and passive recreation, such as a greenway. The proposed inclusion of the greenway as a portion of public open space will assist in ensuring sufficient space is set aside for the creation of this important piece of infrastructure for the local and broader community. This area would make up a portion of the legislation requirement for public open space (12.5%).	58.5 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		58.6 *Suggests the draft DPA will affect several small businesses situated within the affected area as it does not allow them to remain.*	58.6 The existing businesses situated within the draft DPA affected area are able to continue operation under the legislation's existing use provisions despite any zoning change. Closure would be dependent upon the decision of the business owner/operator. All land owners within the draft DPA affected area and the wider catchment were invited in writing to	58.6 No further amendments to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			consider the draft DPA and provide their feedback during the statutory consultation process.	
59.	Sue Johnson 17 Tarcowie Street, Kilkenny	*59.1 Supportive of a redevelopment of the former Bianco site.*	59.1 Noted.	59.1 No further amendments to the draft DPA.
		59.2 Concerns with privacy of existing residences due to overlooking potential.	59.2 Issues relating to overlooking adjoining properties is acknowledged. The Development Plan contains existing policies that address building siting and design, building envelopes and staggered setbacks, screening techniques measures that are able to moderate this interface impacts. In relation to building heights following a review of the submissions received, the following amendments to the draft DPA are proposed: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to	59.2 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five storeys as originally consulted as part of the draft DPA. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		59.3 Concerns with potential overflow of cars parked on already congested and narrow surrounding streets.	59.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	59.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		59.4 Concerns increased traffic will create unsafe conditions for young children in the local streets who come and go from the MJ McInerney Reserve.	59.4 While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA, the wider local road network and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal).	59.4 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with Council's Transport Strategy for local roads such as those within this location. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		59.5 Following traffic suggestions provided: • *All traffic out of the development must go along Pinda Street to Kilkenny Road.* • *Block the Mundulla Street and Arkaba Road intersection to stop traffic turning onto Arkaba Road.* • *A new flow of traffic out to Port Road, via Aroona Road (new access required).*	59.5 Suggestions are noted. Refer to response in row 59.4 regarding sufficient capacity of the local road network. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised Traffic Impact Assessment concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy and therefore alternative access arrangements are not considered warranted. The suggestion to close roads within the local road network has not been considered as part	59.5 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			of this draft DPA. Directing all egress from the Development to Pinda Street is regarded as unnecessary and is likely to impact the function of this arterial intersection, as well as traffic safety in David Terrace and Kilkenny Road as drivers seek to turn to access parts of the road network to the north and east of the site. The closure of Arkaba Road is also regarded as unnecessary as the current daily traffic volume in Arkaba Road is 70 vehicles per day and is regarded as having sufficient capacity to accommodate the additional traffic volumes generated by the Development, which is expected to be less than 150 vehicles per day in Arkaba Road. A new access road linking to Aroona Road (across the Outer Harbor Railway Line) is not supported by the Department for Transport.	
60.	Peter Kentish 64 Harvey Street, Woodville Park	*60.1 Page iv - Suggests there is no indication within the DPA that if there are changes made to the DPA after community consultation that the revised DPA will be released to the public for further consultation.*	60.1 Comments noted. Council intends to follow statutory requirements for the draft DPA process. A second-round public consultation is not required if there are no extensive revisions made. The Summary of Consultation and Proposed Amendments (SCPA) when prepared is made publicly available before Council considers a final draft of the DPA. The SCPA will document how the Council has responded to submissions made and communicate what policy amendments are	60.1 Outline in the SCPA the recommended proposed amendments to the draft DPA following a review of the submissions received for Council's consideration firstly then for the Minister's consideration.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			proposed to address certain matters raised through the consultation process.	
		60.2 Page 7, section 2.2 – Suggests the draft DPA does not seem to address target 5 of the 30 Year Plan (Urban green cover is increased by 20% in metro Adelaide by 2045).	60.2 Noted. While the location is intended to provide for more intense development which may reduce opportunities for planting of trees on private land, it is important to note the draft DPA affected area is already limited with greenery present. However, Council is now seeking the provision of additional open space within future development for the site, and this will provide for additional plantings, consistent with the intent of this Target. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides	60.2 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			provide opportunity for trees and smaller vegetation to be planted. The detailed design of the public open space is however not a matter that the draft DPA can address (other than the desired approximate location and size). This ordinarily occurs at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			new roads are proposed to provide wide footpaths for sufficient space for street trees.	
		60.3 Page 9, section 2.3.3 - Confusion as to why Council and Government Agency Infrastructure Planning in the draft DPA is not relevant in that it is listed as 'nil'.	60.3 There are no current infrastructure planning proposals by the Council, the Minister or other government agencies specifically in the location of the draft DPA site. These are listed where they are already planned and separate to the investigations undertaken as part of this draft DPA.	60.3 No further amendments proposed to the draft DPA.
		60.4 Page 9, section 2.3.4 – It cannot be agreed that the Woodville Road DPA (under preparation) would have no effect on the current proposed DPA with respect to vehicle traffic and the consequences. It has been rumoured that Woodville Road may become a one-way carriageway and this would have impacts upon David Terrace and Kilkenny Road.	60.4 The draft DPA is specific to that location and resultant zone policies are not considered to affect this draft DPA. Other recommendations relating to the final format and flow of Woodville Road fall outside of the Development Plan's remit and would likely require other significant consultation processes. No specific design proposals have been decided for the treatment of Woodville Road, and as such the draft DPA can only consider the data and designs available at the time of preparation.	60.4 No further amendments proposed to the draft DPA.
		60.5 Pages 16-18, Section 3.2.1 – It is not clear what 'immediate interface' translates to in regards to setback distance for 2 storey dwellings. Edits to wording: 'In this sense, the form close to the Mundulla Street frontage is	60.5 The immediate interface will retain a single storey height within 7m of the *Historic Conservation Area* and then two storey between 7m and 30m of the Mundulla Street frontage. Suggested word editing for the investigations is noted but does not warrant	60.5 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

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		most important and controls limiting this must be reflected within the policy'. Page 18 - 'in order to minimise architectural block, these interface areas must utilise architectural expression'	specific policy response as the intent remains the same. Policy wording cannot reflect a mandatory stance within a Development Plan as no individual policy can be mandatory.	
		60.6 *Page 18, Section 3.2.1- It is stated that the density of development anticipated within the affected area are not to be higher than those found within Bowden or West Lakes. A table comparing the minimum density of the affected area, Bowden and West Lakes is given however these 'minimum' numbers do not indicate that the actual densities are not necessarily less than those of Bowden or West Lakes as it does not stipulate a maximum. A maximum density should be stated.*	60.6 Noted and agree. There is a need to provide an upper limit to densities, notwithstanding the building height limits applied across the draft DPA's affected area. This is principally in response to the traffic generation of development. As such an assessment of up to 300 dwellings has been confirmed as maintained appropriate traffic volumes within local streets. As such, the upper density limits will be reflected within the Zone through specific additional policy.	60.6 Apply maximum density ranges for residential development within the zone for the affected area.
		60.7 *Pages 18-19, Section 3.2.1 – There is a reference made to road widening on David Terrace and additional setbacks requirements to encourage street activation e.g. outdoor dining due to the narrow nature of the existing footpath. The representor assumes this area along David Terrace will be outside the existing Torrens*	60.7 Road widening operations are undertaken by DPTI and are expressed within the Metropolitan Adelaide Road Widening Plan which is gazetted document. The Road Widening Plan seeks to identify where possible road widening may be needed for specific locations to facilitate any future widening works. This may or may not eventuate for David Terrace, and will depend on future DPTI	60.7 No further amendments to the draft DPA.

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		Engineering building which is not a pleasant environment for outdoor dining. The increased setback would erode that space for retail/commercial floor space. *What would be the purpose of the road widening along David Terrace unless the road crossing the railway line and the road opposite is also widened? Staff members of Torrens Engineering on David Terrace have not been advised that their occupancy of the site will end if the draft DPA goes ahead.* *On page 19 there seems to be a conflicting statement with the above concept of increased setbacks for street activation – "For locations within the affected area where this is intended to be a focus for non-residential land uses at ground, there is a strong desire to meaningfully frame and activate the street space through minimal setbacks".*	proposals. However, it is pertinent to ensure that Development Plan policy takes this into consideration as it may shape overall forms at specific locations. The presence of road widening does not mean it will be needed if the draft DPA is approved. Any future proposal will have to have regard to its existence; however, existing buildings and businesses do not need to vacate sites as a result. The desire to have buildings from public spaces applies across the zone and not just along David Terrace. Nevertheless, any proposal that results in the redevelopment of the site fronting David Terrace should consider providing space that allows for a comfortable pedestrian environment, including possible outdoor dining noting that the adjacent plaza may be more attractive for this activity. With respect to existing land uses within the draft DPA area, these ongoing land uses have existing use rights regardless of the land being rezoned. The land owner of the Torrens Engineering site was directly notified during the draft DPA consultation and invited to view the draft DPA and provide comments.	

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		60.8 *Page 26, Section 3.2.5 – DPA document typos identified – the bus stop about 100m south of Wilpena Street is on Kilkenny Road on the opposite side of the railway, not David Terrace as identified in the draft DPA.* *Public transport via buses on weekends and early weekday periods may be very limited and impractical for residents of the new development due to the limited schedules of bus timetables of J8 and J7 (nearest stops to development site). Residents will be more inclined to use private vehicles instead of the poorly efficient bus services, thus the traffic impact is likely to be greater than envisaged in the draft DPA.* *The proposed pedestrian crossing point over the railway line at the edge of MJ McInerney Reserve would represent major safety risks for children entering and leaving the Reserve as the crossing connects Aroona Road South which is narrow and acts as an access road for large trucks entering/exiting OI Glass.*	60.8 Noted, bus services are secondary to the rail activity for this location and the site remains well connected to public transport through various modes. The issue of safety of the southern rail crossing for pedestrians is noted. This is an existing crossing and the draft DPA is not seeking to alter this, but rather ensure the development and surrounding open space recognises this crossing in its design.	60.8 A Concept Plan is proposed as an amendment to the draft DPA to highlight desired pedestrian/cycle linkages and the location of the existing Kilkenny Railway Station to inform the assessment of future development.

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		60.9 *Page 27, Section 3.2.5 – The structure of the first sentence is confusing i.e. what does both refer to?* *The suggestion of policy for off-street communal parking within the Development Plan is a great suggestion, however it is written as if the DP has not been finalised. One would have thought that a DPA would come after a DP – this is a little unclear.* *Off street parking requirements for dwellings may be understated as the level of public transport may not be as great as the draft DPA and Appendix B seems to suggest. In addition, depending on the nature of the proposed retail/commercial precinct, the probability that those attending the precinct would arrive and leave via public transport is much lower than suggested within the DPA.* *On-site car spaces in a tandem parking arrangement proposed for detached and semi-detached dwellings is questionable as it is likely that the second vehicle will be parked on-street. In addition, it is questionable for*	60.9 Comment noted. All DPA investigations involving a rezoning for potential higher residential densities or commercial/retail land uses requires a traffic impact assessment. Based on the draft DPA affected area a density scenario is developed to determine the anticipated traffic volumes and impacts to the surrounding street network. The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. The existing provisions were reflected in the draft DPA investigations under Section 3.2.5, Car Parking. The intent is to retain the same car parking standard that applies to the balance of the City for residential land uses reflecting the proximity of the area to the CBD and a range of public transport options, including high frequency and capacity services and the location of the greenway.	60.9 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

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		detached, semi-detached and apartment dwellings with 3, 2 or 1 bedrooms to have as little as 2, 1.25 or 1 vehicles on average. For example, a 3-bedroom dwelling may have at least 4 residents that all require individual vehicles. This issue indicates that the DPA estimate of vehicles may be significantly low which has flow on impacts on parking, traffic management and safety. *The rise in popularity of SUV type vehicles will create some difficulties with off-street parking where parking space size is not generally generous, especially in the case of communal off-street parking.* *The MJ McInerney Reserve is very well patronised on weekends and car parking can be difficult in that vicinity.*	The requirements for detached dwellings and semi-detached dwellings seek a minimum of 2 spaces on site. For other dwelling types such a row-dwellings, group dwellings and residential flat dwellings the rate is reflective of the developments location to a district centre and public transport options, including high frequency services. Policy also exists in the Development Plan to address on-street visitor parking, contained in the Land Division module of the General Section, which seeks that land division proposals should provide sufficient space for on-street visitor car parking (*at least one on-street visitor car parking space being provided for every two residential allotments*). The assessment of suitability of on-street car parking and off-street car parking would occur at a development assessment stage, which follows the draft DPA process. The demand likely to be generated from retail and commercial land sues is likely to be low, given that their scale has been reduced down to 250m² for shops and 1,000m² for commercial development. These uses are not considered to be significant attractors for	

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			traffic, and likely to provide local services to residents and the surrounding community. The design of off-street parking is guided by Australian Standards and the Development Plan references the standards (through Core SAPPL policy) for this issue.	
		60.10 *Page 28, Section 3.2.5 – The traffic impact study was based in part on the estimated number of vehicles which is likely understated and not conservative. The claimed impact of public transport which may be overstated, especially the bus services and the assumption that those attending the retail areas will be doing so via public transport.* *There should be SIDRA modelling of Pinda Street/David Terrace and Mundulla Street/David Terrace intersections for AM peak times which may be more concentrated than PM peak periods. It would also be affected by trains where traffic can be banked up significantly along David Terrace.*	60.11 Traffic assessment has been prepared taking into account Council and DPTI traffic data and is commonly used for informing development proposals and road infrastructure projects. Council has sought the advice of transport experts in the provision of their advice. This has been subsequently confirmed by both DPTI and Council's traffic engineers. The traffic generation rates have been sourced from the Roads and Maritime Services of NSW "Guide to Traffic Generating Developments", which is an accepted industry guideline. The traffic assessment includes all the retail and commercial traffic generation, however it is anticipated that some trips associated with the retail component will be local walk-in trips or ancillary to other trips to or within the precinct (for example, trips to retail to/from work or MJ McInerney Reserve). The site is located in very close proximity to Kilkenny Railway	60.11 No further amendments to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		There's no modelling of traffic leaving Harvey Street East which tends to be congested in peak hours. *Details have not been provided of the residence correspondence relating to safety concerns at Mundulla Street/Wilpena Terrace intersection which is referred to in Appendix B.*	Station, public bus stops in David Terrace and Kilkenny Road and the Outer Harbor Greenway cycling corridor. As a result, the estimated traffic generation is considered to provide a very robust or upper-end estimate of the potential traffic impact associated with redevelopment of the draft DPA site. SIDRA modelling has been undertaken primarily to assess the impacts of draft DPA site redevelopment on traffic flow in David Terrace, hence the focus on analysis of queues within David Terrace. Based on the revised traffic generation calculations, the AM peak hour in Pinda Street is likely to result in less than 60 additional vehicles exiting Pinda Street from the proposed left-in left-out arrangement, which equates to an average of less than 1 additional vehicle exiting Pinda Street per minute and is not regarded as significantly impacting on traffic flow through this intersection. The impact of the additional traffic accessing Mundulla Street is not expected to lead to significant impacts in Harvey Street East since none of the draft DPA traffic is directed to Harvey Street East and only some of the turning movements at the intersection of Mundulla Street and David Terrace cause delays for only some of the vehicles exiting	

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			Harvey Street East (it really is only right turns into and out of Mundulla Street that conflict with right turn movements out of Harvey Street East). As part of the briefing on the background to this study the traffic engineering consultants were advised about existing issues and the concerns of local residents and a general comment about previous resident correspondence about safety concerns at the intersection of Mundulla Street and Wilpena Terrace was included in the traffic report. The specific detail about this correspondence is not regarded as relevant to the current reporting, however we can advise that the concerns relate to the crash history at the intersection (which is covered in the report) and potential for future traffic safety risks at the intersection.	
		60.11 Page 29 & Appendix B, Section 6.2.2 – Does the channelised lane on David Terrace have sufficient length to accommodate the peak hour traffic? A deceleration distance of 55 metres may be understated.	60.11 The traffic analysis indicates that the PM peak hour queue for the right turn from David Terrace into Mundulla Street is likely to remain well within the capacity of the right turn lane.	60.11 No further amendments to the draft DPA.
		60.12 Page 32, Section 3.2.7 – The assumption of an average of 2 residents per dwelling may be a	60.12 Comments noted. The average household size is based on latest Australian Bureau of Statistic data. The draft DPA through the	60.12 Amend the draft DPA, to address the desire for additional public open space.

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		significant understatement for dwellings of 1,2 and 3 bedrooms. An average of 3 would be closer to the mark which would translate to 990 residents living at the development site. This is approaching the benchmark of 1,000 people per 2 hectares of open space (MJ McInerney Reserve is 2.45 hectares) even without considering all the other existing residents in the undisclosed surrounding areas. The real concentration of residents, both post development and current, may well be significantly greater than the benchmark. *Currently, the MJ McInerney Reserve is extremely popular on weekends and car parking in the area of the Reserve is at a premium. This indicates that the Reserve may not be sufficient on its own as the sole open space area for the development once its constructed.*	consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		60.13 Suggested some figures, particularly maps, were reproduced in low resolution which proved to be difficult to read.	60.13 Comments noted. Further clarity can be provided if specific clarification required.	60.13 No further amendments proposed to the draft DPA.
		60.14 If other intersection formations are considered at the development application stage will they go out for public consultation?	60.14 Public consultation requirements of development applications will be subject to the Development Regulations, 2008 and may vary depending on the application type.	60.14 No further amendments proposed to the draft DPA.
61.	Leeahna Johnson 17 Tarcowie Street, Kilkenny	*61.1 Increased traffic concerns. Suggests smaller side streets will not cope such as Alfred Terrace, Aroona Rd and Wilpena Terrace as they are already used by many to avoid major roads and users travel at high speeds despite the 40km/h speed limit (crashes on these streets is common).*	61.1 While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA, the wider local road network and concluded the following:	61.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with Council's Transport Strategy for local roads such as those within this location. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		61.2 Considers the increase in traffic and population will require additional road safety measures such as pedestrian crossings or traffic lights, especially around the MJ McInerney Reserve and high foot traffic areas that lead to the train station.	61.2 The Department of Planning, Transport and Infrastructure were consulted as part of the draft DPA consultation process. Based on the previous investigations, the Department nor the recommendations in the traffic investigations did not indicate the need for new traffic signals in the arterial roads bounding the draft DPA affected area.	61.2 No further amendments proposed to the proposed draft DPA.

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			As detailed above, based on a reduce yield the findings demonstrate that the surrounding local road network is expected to remain below 1,500 vehicles per day and therefore there is adequate capacity in the surrounding local road network to cater for the additional traffic based on the amended policy. With regard to pedestrian crossings or traffic lights near MJ McInerney Reserve and the Kilkenny Station, the design of the internal street network will aim to provide a pedestrian friendly street environment, similar to new subdivisions in St Clair, Woodville West and Bowden. Whist vehicle and pedestrian volumes are unlikely to warrant the installation of traffic signals and push-button crossings, these pedestrian crossing options can always be considered at the detailed design stage should the draft DPA be approved.	
		61.3 *Concerned with increased numbers of cars requiring parking. Considers not enough allocated spaces per proposed dwelling for residents and visitors and potential for spill out onto surrounding side streets.*	61.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car	61.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			parking requirements for future development. Refer to comments in Row 1.3.	address the traffic impact concerns received through the consultation process.
		61.4 Concerned with the impact of increased population on the community.	61.4 Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network.	61.4 Amend the draft DPA policy relating to building heights, desired dwelling yield to address concerns raised through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		61.5 Suggests the height/scale of the proposed development does not complement the existing single to double storey dwellings in Kilkenny. Overlooking into existing properties from the development will be an issue.	61.5 Issues relating to building heights / overlooking is acknowledged. The Development Plan contains existing policies that address building siting and design, building envelopes and staggered setbacks, screening techniques measures that are able to moderate this interface impacts. In relation to building heights following a review of the submissions received, the following amendments to the draft DPA are proposed: • A maximum of 2 storeys, south of Mundulla Street (with single storey form within the first 7 metres of the Mundulla Street frontage), north-west corner of Arkaba Road and Pinda Street and west of Wilpena Terrace, adjacent to David Terrace) adjacent to the existing Residential Character Zone (a reduction from proposed maximum of three storeys as originally consulted as part of the draft DPA. • A maximum of three storey-built form proposed north of Pinda Street up to Arkaba Road and south of Pinda Street, between Arkaba Road and Wilpena Terrace. • A maximum of four storeys proposed south of Pinda Street, east of Arkaba Road, which is a reduction from the proposed maximum of five	61.5 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			storeys as originally consulted as part of the draft DPA. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
62.	Ross McNaughtan 25 Wilpena Terrace, Kilkenny	*62.1 Concerned with the large increase in traffic on the surrounding streets. Queried whether Council invest in repairing and upgrading the surrounding streets to accommodate the increased traffic and wear and tear inflicted on them?*	62.1 While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA, the wider local road network and concluded the following:	62.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			• 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with Council's Transport Strategy for local roads such as those within this location. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy With regards to upgrades and repairs on existing streets, the asset maintenance of existing public infrastructure eg. streets, footpaths are matters outside the scope of the draft DPA. Infrastructure upgrades in the area are subject to on-going asset management review/prioritisation and budgeting processes for Council controlled assets.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		62.2 Concerns with an increase in demand for on-street parking where it is currently limited.	62.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	62.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		62.3 Suggests the increased demand on community services in the area due to an increase in population and anticipates an upgrading of these services?	62.3 Upgrading community services in the area are subject to Council's on-going review, prioritisation and budgeting processes. While the draft DPA investigations concluded that the affected area is well serviced by a range of community uses, it was recommended that it was considered appropriate for the policy framework to envisage and facilitate a range of non-residential community land uses which serve the local population. This is reflected in the draft policy.	62.3 No further amendments proposed to the draft DPA.
63.	Irene Tsoukalas 2 Wilpena Terrace, Kilkenny	*63.1 Welcomes a redevelopment of the former Bianco site, but raises some concerns.*	63.1 Comments noted.	63.1 No further amendments proposed to the draft DPA.
		63.2 Concerned the construction phase of a new development will cause undue noise and disruption.	63.2 Concerns regarding disruptions during construction and the safe remediation of the land are noted. These are all matters outside	63.2 No further amendments proposed to the draft DPA.

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			the scope of the draft DPA. With regards to future demolition, construction noise, future remediation of the affected area and traffic management during construction, these matters will be dealt with following any future development approvals for proposed land uses in accordance with an approved remediation plan, traffic management plan and the requirements of relevant legislation such as the *Environment Protection Act 1993*.	

		63.3 Concerns raised with the potential for 5 storey development.	63.3 The proposed height limits applying to this area have been derived on the basis of a range of urban design and amenity considerations to achieve reasonable development yields and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	63.3 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		63.4 On-street parking issues raised.	63.4 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	63.4 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		63.5 Concerned with increased rates of crime and behaviour, development becoming a ghetto.	63.5 With regards to anti-social issues this matter cannot be assumed to be attributed directly to a higher density of residential living and is not considered a planning matter to address in the scope of the draft DPA.	63.5 No further amendments proposed to the draft DPA.
		63.6 Concerned that dwellings of the new development will not be occupied.	63.6 Concerns relating to potential for unoccupied future dwellings is not a matter that can be addressed in the scope of the draft DPA.	63.6 No further amendments proposed to the draft DPA.
		63.7 Concerns raised with overlooking onto neighbouring properties.	63.7 Issues relating to overlooking adjoining properties is acknowledged. The Development Plan contains existing policies that address building siting and design, building envelopes and staggered setbacks, screening techniques measures that are able to moderate this interface impacts. As detailed in row 63.3 policy amendments are proposed to reduce the built form to further improve the transition	63.7 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			between the draft DPA Affected Area and the adjacent residential area.	
64.	[redacted] West Croydon	64.1 *Indicated support for a rezoning to a mixed-use zone.*	64.1 Noted.	64.1 No further amendments proposed to the draft DPA.
		64.2 *Concerns with parking issues around the MJ McInerney Reserve. Concerned residents will resort to parking on the street because of the lack of on-site parking allocated to each dwelling of any new development.*	64.2 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	64.2 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		64.3 *Considers the building height is excessive and detrimental to the character of the area where there is a maximum of 2 storey buildings.*	64.3 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1.	64.3 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		64.4 The extension of the greenway is supported and other pedestrian connections with the hope that there are no issues with blind spots for cyclists (currently there are issues where cars fail to slow down on Gibson St).	64.4 Noted support for greenway and pedestrian connections. The detailed design of the proposed greenway is not within the scope of the draft DPA process. The design will be addressed at a later stage and will need to meet engineering standards.	64.4 No further amendments proposed to the draft DPA.
65.	Christine Braham 14 Alfred Road, West Croydon	*65.1 Seeking a significant reduction in the overall number of new homes.*	65.1 Increasing housing choices, dwelling densities (thereby population) within the established metropolitan area in close proximity to current and proposed fixed line rail, tram, O-Bahn and high frequency bus routes directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) The draft DPA investigations included an infrastructure analysis based on a proposed scenario of 500 dwellings and concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal.	65.1 Amend the draft DPA policy relating to building heights, desired dwelling yield to address concerns raised through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised through the submissions received on the impacts from potential traffic on the local road network.	
		65.2 Seeking a reduction in building heights.	65.2 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone.	64.2 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		65.3 Considers the density of off-street car parking is in adequate and seeks an increased ratio in the requirement for off-street parking for each dwelling.	65.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	65.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		65.4 Seeking greater public open space. Considers that MJ McInerney Reserve not be treated as satisfying the open space requirement for the development i.e. open space needs to be provided within the development as per the current requirement for developments.	65.4 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Draft policy amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan.	65.4 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		65.5 Concerns raised on the impact of anticipated increased traffic on streets in the whole of the local area including West Croydon and concerns David Terrace will become further congested.	65.5 Comments are noted Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised	65.5 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy. In regards to David Terrace the draft DPA traffic investigations considered the intersection functions along David Terrace and within the affected area with the proposed additional volumes (proposed during consultation) and the advice indicated that *additional traffic volumes at the Mundulla Street/David Terrace intersection will increase queues in the channelised right turn lane on David Terrace (for vehicles waiting to turn right) but remain within the capacity of the existing channelised turning lane (even with additional traffic volumes diverted from right*	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			turn restrictions at the Pinda Street intersection).	
		65.6 Seeking new development be sympathetic to the character of the existing areas such as colours and materials.	65.6 The draft DPA affected area is currently located in an Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place.	65.6 Amendments proposed to further improve the transition of building heights.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The proposed reduction in built form also aims to improve the transition between the draft DPA Affected Area and the adjacent residential area.	
		65.7 *Sought clarification on the amount of off-street car parking for staff, visitors and deliveries that will be provided for the commercial and/or retail area in the development.*	65.7 The Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. The existing provisions were reflected in the draft DPA investigations under Section 3.2.5, Car Parking. In response to submission concerns the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes and policy proposed to guide the location of non-residential land uses adjacent to David Terrace and east (adjacent to Wilpena Terrace). The Development Plan provides off-street carparking requirements for retail land uses. The draft DPA investigations highlighted the car parking ratio in this location requires a minimum of 3 spaces per 100m² of gross leasable floor area reflective of the proximity	65.7 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			and accessibility of the affected area to frequent public transport (Kilkenny railway station).	
66.	Linda Muller 6 Aroona Road, West Croydon	66.1 *Traffic concerns raised with potential congestion and potential gridlock on both of the major arterial roads (Kilkenny Road and Torrens Road) and the narrow side streets (in particular Mundulla Terrace, Wilpena Terrace, Aroona, Pinda Street, Alfred Road and Rosetta Street). Suggestions made to widen Kilkenny Road and a railway underpass or overpass by Kilkenny Station and blocking side streets to stop rat-running. Concerned with potential vehicle collisions and damage with parked cars.*	66.1 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of	66.1 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy and therefore alternative access arrangements are not considered warranted. The suggestion to close roads within the local road network has not been considered as part of this draft DPA and is regarded as unnecessary as the current daily traffic volumes in the adjacent streets is regarded as having sufficient capacity to accommodate the additional traffic volumes generated by the Development.	
		66.2 Concerns for potential risk to local residents on foot as they cross roads to access the MJ McInerney Reserve as there are no pedestrian crossings currently.	66.2 With regard to pedestrian crossings near MJ McInerney Reserve, the design of the internal street network within the draft DPA affected area will aim to provide a pedestrian friendly street environment, similar to new subdivisions in St Clair, Woodville West and Bowden. Whist vehicle and pedestrian	66.2 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			volumes are unlikely to warrant the installation of traffic signals and push-button crossings, these pedestrian crossing options can always be considered at the detailed design stage should the DPA be approved.	
		66.3 Concerns over potential increase in on-street parking demand in the streets surrounding the development due to the low number of carparks being provided for each dwelling and any visitors on site.	66.3 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	66.3 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
72.	Katriona Kinsella Address is confidential	*72.1 General regeneration of the affected area to residential and mixed-use that takes into account reasonable community feedback.*	72.1 Noted. The proposed policy response has taken into account key elements of the community's feedback.	72.1 Amendments proposed to expand of desired public open space, reduce building heights and densities.
		72.2 Seeking generous pedestrian and cyclist connections to the MJ McInerney Reserve, the train station platform and the Outer Harbour Greenway.	72.2 Agree. The connections are important for the future development of the site and the policy included within the draft DPA seeks to ensure this is achieved, particularly through the Greenway connection, as well as a Concept Plan which will now be able to be incorporated into the Code upon transition.	72.2 Proposed Concept Plan included in the amendments to highlight the desired location of linkages, the proposed greenway and additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		72.3 Raised concerns on impacts of increased traffic on existing roads, residents and businesses.	72.4 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic volumes for local streets in the Council area.	72.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		72.4 Suggests the Affordable Housing Overlay provisions currently propose that apartments built under this policy would at a minimum require '0' car parks and any other dwelling would require a minimum of 1 car park. Zero car parks required for apartments is outrageous.	72.4 The statement is incorrect. There is no concession given to residential development (apartments) in the Charles Sturt Development Plan applicable to the *Suburban Activity Node Zone*.	72.4 No further amendments proposed to the draft DPA.
		72.5 Suggests the Affordable Housing Overlay includes allowance for a 'decrease of minimum site areas of up to 20%.' Again, affordable housing should not constitute a decrease on minimum standards and quality of living.	72.5 This statement is incorrect. The policy within the affordable housing overlay in the Development Plan does not provide for discounts to site areas. Site areas are addressed within the Suburban Activity Node Zone and will be adjusted to a reduced yield that reflects the desired maximum vehicle movements within the local road network.	72.5 No further amendments proposed to the draft DPA.
		72.6 Meaningful feedback has been compromised on this draft DPA due to the lack of concept plans available. It is not clear in the maps provided in the draft DPA what is considered to be a	72.6 Comments Noted. The Concept referred to within the GTA report has not been able to be adapted as part of the draft DPA due to direction at the time from the Department that Concept Plans will not be accepted in the	72.6 Amendments to policy to address desired building heights in specific locations and the inclusion of a Concept Plan to show desired

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		'core location', something often referred to in the DPA.	future Planning and Design Code. This has now been revised, and a Concept Plan is now proposed. The changes to the extent of densities sought across the affected area, as well as building heights, means that the concept of core and transition will need to be abandoned for the Kilkenny part of the Zone (they will be retained for Seaton). Policy will be revised to reflect the specific locations by reference to street rather than the concepts of Core and transition.	infrastructure such as public open space, greenway location and access and internal roadways.
		72.7 *Suggested the lack of detail about a graduated storey approach within the draft DPA. A maximum of 2 storeys should be extended to Arkaba Road and Pinda Street.*	72.7 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone,	72.7 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			noting that two-storey built form is also envisaged in this existing Zone.	
		72.8 The presence of the adjacent reserve should in no way compromise on the minimum standards of allocating 12.5% open space or less to the development area.	72.8 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	72.8 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		72.9 Confusion surrounding what zone the affected area will be under as the P&D Code Consultation Map Viewer currently proposes the affected area as the Employment zone.	72.9 Comments noted. The timing with the Draft Planning and Design Code (Code) consultation was unfortunate but unavoidable, however the Consultation draft DPA clearly states the intent to rezone to the Suburban Activity Node zone under the Development Plan. The manner in which the zone transitions within the Planning and Design Code is still being negotiated with the Department, however, the intent will be to not change key policy measures such as heights, densities and land uses. Other important elements will be maintained through the recommended inclusion of a Concept Plan.	72.9 Continue to liaise with the Department if the draft DPA is authorised on an appropriate transition of policy to the Code including recommendations to the Minister as part of the draft DPA package.
		72.10 Concerned there is no information on the Your Say page about the potential impacts of the new Planning and Design Code and how the feedback from those that have taken the time to carefully draft comments will be used going forward.	72.10 Refer to comments in row 72.9 above.	72.10 Refer to response in row 72.10.
		72.11 Seeking landscaping along the train line which provides generous landscaping between the trainline and the start of residential development, making a significant positive impact on the quality and aesthetic of the area.	72.11 The draft DPA policy covering the affected area aims to include opportunities for the provision of the Outer Harbour Greenway along the rail corridor which will provide landscaping opportunity along this corridor. There is also additional areas identified within	72.11 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			the Concept Plan for public open space which will contribute to this.	
		72.12 Outlined to make this site an exemplary for including adequate green space.	72.12 Agreed. See comment in row 72.8 above.	72.12 Refer to response in row 72.8.
73.	M & Toni Tassone 10 Yallum Terrace, Kilkenny	*73.1 Supportive of a redevelopment but a lesser scale.*	73.1 Noted, refer to comments in row 73.2.	73.1 Refer to Council response in row 73.2.
		73.2 Considers the proposed 5 storey development and number of dwellings too high, impacting the existing residences.	73.2 The proposed height limits were proposed to achieve reasonable development yields and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent residential area. In relation to housing numbers, increasing housing choices, dwelling densities (thereby population) within the established metropolitan	73.2 Amend policy to the draft DPA to reflect the proposed reduction in building heights and desired dwelling yield to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			area in close proximity to public transport services directly align with the South Australian Planning Strategy (30-Year Plan for Greater Adelaide, Updated 2017) Notwithstanding the above rationale, in light of the review of submissions received an amended policy scenario is proposed to reduce the potential yield from 500 to around 300 dwellings to minimise the concerns raised on the impacts from potential traffic on the local road network.	
		73.3 Indicated the surrounding streets such as Aroona Road, Pinda Street, Mundulla Street and Tarcowie Street are too narrow. Suggested an underpass or overpass be constructed on Kilkenny Road at the railway line to ease traffic congestion.	73.3 A revised Traffic Impact Assessment has been undertaken based on the issues raised in the consultation process based on a reduce yield. The findings indicate that the surrounding local road network is expected to remain below 1,500 vehicles per day. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy and therefore alternative access arrangements are not considered warranted.	73.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		73.4 Concerned with car parking in the area.	73.4 The issue of car parking is noted and acknowledged as a common issue experienced within established residential areas. While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3.	73.4 While no further amendments are proposed to increase off-street car parking ratios for residential development, amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		73.5 Seeking more green space in the area.	73.5 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Draft policy amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan.	73.5 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	
		73.6 Concerned with the impact on existing infrastructure (water, sewerage, electricity and gas).	73.6 The draft DPA investigations included an infrastructure analysis based on a proposed likely development scenario of 500 dwellings which is now proposed to be reduced in yield. The investigations concluded that existing infrastructure such as water supply, sewer, electricity, gas, electricity and telecommunications are able to service the proposal. Likely upgrades to water supply and sewer are dependent upon the future development of the site. The extension or augmentation of specific infrastructure is a matter that will be addressed at the future development application stage.	73.6 No further amendments proposed to the draft DPA.
74.	Tracey Davis and Eugene Suleau 79 Wilpena Terrace, Kilkenny	*74.1 Supports a redevelopment of the site, however raises several concerns.*	74.1 Noted.	74.1 No further amendments proposed to the draft DPA.
		74.2 Concerned the proposed density is too high as a 5-storey maximum for development is beyond what is reasonable for impacts on the	74.2 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of	74.2 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		surrounding area. Considers a 2 to 3-storey limit would lessen the impact for the existing and new residents.	the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone.	through the consultation process.
		74.3 Seeking development between Mundulla Street and Pinda Street remain at 1 to 2-storey dwellings to remain in keeping with the heritage precinct.	74.3 The draft policy responds to local interface context, including the existing *Historic Conservation Area*, by adopting the proposed graduated building height approach. This approach applies to development between Mundulla Street and Pinda Street. Details of the approach include retaining a single storey height within 7m of the *Historic Conservation Area,* limiting 2 storeys up to 30m of the Mundulla Street frontage. Beyond this, the potential for three storeys is unlikely to impact on the historic streetscape context of Mundulla Street.	74.3 Amend policy to the draft DPA to reflect the proposed reduction in building heights to address concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		74.4 Concerns raised that commercial areas within this development will add undue traffic and congestion to the area.	74.4 Given the widespread traffic concerns associated with commercial tenancies within the DPA site, the desired floor area for retail and commercial land uses has been amended to also reduce the potential traffic volumes and policy proposed to guide the location of non-residential land uses adjacent to David Terrace and east (adjacent to Wilpena Terrace). The reduced scale of any new retail development will unlikely create large traffic and parking demands, noting that this location currently allows the accommodation of a range of industrial, retail and commercial development.	74.4 Amend the draft DPA policy to reduce desired commercial/retail floor areas.
		74.5 Seeking development be built to be complimentary to the existing housing structures and employ some of the structural elements and colour schemes seen in existing heritage housing.	74.5 The need to be contextual for development along Mundulla Street and portions of Pinda Street adjacent to the Historic Conservation Area are noted, however, this should be principally through height / form of development. This is reflected within the policy proposed. It is not intended that development in this location mimic historic development as this would undermine the original extent of the Historic Conservation Area. The existing Development Plan contains policies that address built form design and appearance to ensure future development proposals complement existing built form and character, but also address issues of	74.5 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			articulation, modulation and design interest within building facades.	
		74.6 Concerned with traffic increase in the local area, thus increasing the possibility of traffic becoming gridlocked during peak hours. Considers it will be hard to enter and exit and park within the development. Traffic issues on the small side streets of Pinda Street, Tarcowie Street, Penola Street, Aroona Road and Mundulla Street will intensify. There will be greater potential for crashes with cars trying to share the road.	74.6 Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with the City of Charles Sturt Traffic Management Strategy in relation to acceptable traffic	74.6 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			volumes for local streets in the Council area. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	
		74.7 The increase of cars could create safety hazards for people crossing to MJ McInerney Reserve.	74.7 The traffic volumes will continue to maintain local function of the road network. With regard to pedestrian crossings near MJ McInerney Reserve, the design of the internal street network within the draft DPA affected area will aim to provide a pedestrian friendly street environment, similar to new subdivisions in St Clair, Woodville West and Bowden. Whist vehicle and pedestrian volumes are unlikely to warrant the installation of traffic signals and push-button crossings, these pedestrian crossing options can always be considered at the detailed design stage should the DPA be approved.	74.7 No further amendments proposed to the draft DPA.
		74.8 Concerns raised with car parking. Suggests cars will need to park in nearby side streets due to a lack of parking within the new development.	74.8 While Council cannot control the number of vehicles associated with a particular property, the Charles Sturt Council Development Plan already contains existing policy in relation to	74.9 While no further amendments are proposed to increase off-street car parking ratios for residential development,

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			off-street and on-street car parking requirements for future development. Refer to comments in Row 1.3. Policy is also proposed within the zone that seeks for development along Mundulla Street to be rear loaded, meaning that there would be minimal driveways along Mundulla Street, maximising on-street parking potential in this location.	amendments are proposed to the draft DPA to reduce desired dwelling yield and commercial/retail floor area to address the traffic impact concerns received through the consultation process.
		74.9 Suggests an increase in sealed surfaces will increase the heat in the suburb.	74.10 In terms of public open space policy amendments are proposed for additional public open space in the draft DPA. The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides	74.9 Amend the draft DPA, to address the desire for additional public open space.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			provide opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings. Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		74.10 Will the existing railway station, bus stops, streets, rubbish bins, park, schools and early childcare services adequately cover a potential population increase of 54% in the area?	74.10 Ongoing infrastructure upgrades in the area are subject to on-going asset management review/prioritisation and budgeting processes for Government controlled assets and Council owned assets. The provision of education facilities is managed by private operators and the State Government based on the demand pressures over larger catchments than the draft DPA area alone. The Department of Education was consulted on the draft DPA on this basis to ensure they are aware of the proposed policies.	74.10 No further amendments proposed to the draft DPA.
		74.11 Several suggestions raised: • *Building a Park and Ride tower which splits the daytime parking into 40% for residents and 60% for commuters.* • *The addition of another roundabout in the lower end of Wilpena Terrace at Mundulla Street or Tarcowie Street to slow down cars that use these streets.* • *Implementing a crossing across David Terrace close to Whitefriars School to assist children and parents to walk or ride to the school safely.*	74.11 Suggestions are noted the following responses provided: • Council does not provide Park and Ride facilities as these facilities are associated with Public Transport provision which is regarded as a State Government responsibility. • With regard to parking for residents, the DPA sets the applicable parking rates for the residential uses within the draft DPA site. The provision of a multi-deck parking facility has not been identified, as the draft DPA considers that parking demand will	74.11 No further amendments proposed to the draft DPA.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		• *Traffic controls such as 2 hour only parking in nearby streets.* • *Including community gardens and walled garden spaces within the plaza area.* • *Consider the use of light-coloured roofs, water recycling, green walls, trees, rain gardens in street verges, communal green spaces, light coloured roads, permeable paving and stormwater channelled for use in garden beds at the MJ McInerney Reserve.*	be accommodated within private property and on public roads (on-street parking). • The construction of new roundabouts in Wilpena Terrace, at Mundulla Street or Tarcowie Street, will be considered as part of the future renewal of Wilpena Terrace road assets. Both intersections are located outside the draft DPA site and installation of roundabouts at these intersections has not been identified by the consultants as a requirement of the current draft DPA. • A request for the construction of a new pedestrian crossing across David Terrace, near Beaufort and Ranelagh Streets, has been previously submitted to DIT, which is the authority responsible for the provision of crossings across arterial roads. The Whitefriars School is located a significant distance from the draft DPA site and installation of a pedestrian crossing facility near Beaufort and Ranelagh Streets has not been identified as a requirement of the current DPA. • The introduction of timed parking controls in local streets surrounding the draft DPA site can be considered by Council if or when parking congestion becomes an	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			issue. Such a proposal would be subject to targeted consultation with residents about the impacts associated with congestion and the potential impacts associated with parking restrictions to reduce congestion. Consultation with residents about possible future scenarios with regard to parking restrictions in the streets surrounding the draft DPA site is outside the scope of draft DPA investigations. • With regards to garden designs in public open space, this detailed design is outside the scope of the draft DPA. The draft DPA desires through policy that development in the affected area should facilitate the creating of a public plaza adjacent to the northern rail station platform within the Wilpena Terrace and Wilpena Reserve. The desire for a plaza will ultimately be a decision of Council on existing public land and would likely be considered further if development is progressed on private land. Consideration of the design of the plaza will be addressed at that stage. • Environmental concerns are noted. The draft DPA through the consultation process, included policy which desires a	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are however, recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted. With respect to green space, the Charles Sturt Council Development Plan also contains existing policy in the General Section of the Plan, which seeks development proposals to provide private open space. The policy envisages private open space at ground level to be designed to assist with ease of drainage form a site, allow for effective deep planting and reduce urban heat loading and improve micro-climatic conditions around sites and buildings.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Existing policies in the Development Plan also seek private open space for apartment style developments “above ground”. The proposed draft DPA zone also includes existing policy within the Desired Character statement that envisages development where new roads are proposed to provide wide footpaths for sufficient space for street trees. With regards to stormwater management, the draft DPA infrastructure analysis identified drainage catchment storage areas that will be required within the site as part of a future development to deal with post-development flows and how stormwater is best managed in accordance with water sensitive urban design principles. The Development Plan already contains a significant number of General Section policies in relation to flooding and stormwater management, which are considered in the assessment of a development application. This includes the desire for maximising the potential for	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			stormwater harvesting through various methods including storing in tanks. Council's Development Plan also contains energy efficiency policy in the General Section. While the policy stops short of desired finishes the policy does desire development be appropriately sited and designed to maximise north facing sun, and roof pitches to facilitate the efficient use of solar hot water services and photovoltaic cells.	
75.	Philippa Forwood Corner of Cavendish and Sackville Streets, West Croydon	*75.1 Concerns raised that the proposed multi-storied apartment concept is out of keeping architecturally with the existing historic built form.*	75.1 The proposed height limits applying to this area have been derived on the basis of achieving a reasonable development yield and mix of dwelling types to capitalise on the proximity of the site to the CBD and public transport services. Nevertheless, following submissions received a review to modify building heights has been considered and resulted in proposed policy amendments to the draft DPA. Refer to comments in Row 2.1. The proposed reduction in built form is considered appropriate to improve the transition between the draft DPA Affected Area	75.1 Amend policy to the draft DPA to reflect the proposed reduction in building heights.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			and the adjacent Residential Character Zone, noting that two-storey built form is also envisaged in this existing Zone. The draft DPA affected area is currently located in an Urban Employment Zone and not in the adjacent Residential Character Zone with the exception of two allotments. The draft DPA acknowledges these sites in the draft policy and envisages future development to have regard to the elements of historic character through the consideration of height, siting, design, use of materials and fencing of new buildings. Notwithstanding a proposed new zoning, development over these sites will be required to be assessed against existing policy in the Historic Conservation Area which seeks new development to complement the historic significance of the area. The draft DPA affected area also contains a Local Heritage Place. Policies also exist in the Development Plan for new development that materially affects the context within which the heritage place is situated should be compatible with the heritage place.	

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		75.2 Concerned there has been no consideration of a dedicated green space for the new residents, reliant on MJ McInerney Reserve.	75.2 The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway line. This area would make up a portion of the legislation requirement for public open space (12.5%). Notwithstanding this, the comments received seeking additional public open space are noted and agreed. This and numerous other submissions have argued for a greater provision of public open space. Draft policy amendments are therefore recommended in the draft DPA for the desire of additional public open space as an expansion of MJ McInerney Reserve to provide the full legislative requirement as a physical contribution. The draft policy is reflected in the proposed zone and shown spatially in the proposed new draft concept plan. The detailed design of the public open space is not a matter that the draft DPA can address (other than the desired approximate location). This will occur at later stages associated with a proposed division of land, which will consider existing Development Plan policy as well as the proposed draft policy.	75.2 Amend the draft DPA, to address the desire for additional public open space.
		75.3 Concerns raised that the traffic impact study has not taken into account the consequences of increased traffic volume on the narrow residential	75.3 While the traffic volumes anticipated within the Traffic Impact Assessment (TIA) as part of the draft DPA investigations concluded that there is adequate capacity in the surrounding road	75.3 Amend the draft DPA policy to reduce desired dwelling yield and commercial/retail floor area to address the traffic

Sub No.	Name/Address	Submission Summary	Comment	Council Response
		streets of West Croydon. Suggested that several including Alfred Road and Cavendish Street which both lead to Rosetta Street could potentially become rat runs for motorists accessing Port Road and Torrens Road from the proposed development.	network to cater for the additional traffic, the concerns raised over potential traffic congestion is noted and acknowledged. Further traffic investigations have been undertaken since public consultation in light of issues raised in several submissions. A revised development mix is being considered by Council with reduced building heights, reduced dwelling densities, reduced areas for non-residential development and increased public open space within the draft DPA affected area. The additional traffic investigations considered the proposed revisions to the draft DPA and concluded the following: • 1,863 daily vehicles movements expected to be generated by the revised development mix (reduction of 1,554 trips from the original draft DPA proposal). • 196 trips in a peak hour period trips are expected to be generated by the revised development mix (reduction of 160 trips from the original draft DPA proposal). • The daily traffic volume in the local streets surrounding the draft DPA site is expected to remain below 1,500 vehicles per day, which is consistent with Council's	impact concerns received through the consultation process.

Sub No.	Name/Address	Submission Summary	Comment	Council Response
			Transport Strategy for local roads such as those within this location. On this basis the revised policy scenario presents a reduced impact on the local road network. The revised traffic investigations concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy.	

Attachment B – Summary and Response to Public Meeting Submissions

Fifteen (15) respondents requested to be heard through their written submissions, and therefore a public meeting was held at Council's Civic Centre on 18 May 2020. The meeting was also held digitally through teleconferencing facilities, due to the Covid-19 pandemic restrictions. People participated online where available, with a few also attending the meeting in person. Of those that expressed a desire to be heard, nine attended and spoke at the meeting, and two additional people came forward and made a verbal presentation.

Sub No.	Name of Respondent	Summary of Verbal Submission/Issues Raised	Council Response
1.	Tony Williams 19 Rowell Crescent, West Croydon (Written submission also provided – refer submission 21	• *Industrial site has been a problem for decades – state of site etc that people are aware of and eager to see something done.* • *DPA is addressing confined space – not like other identified locations such as St Clair or Bowden. Will have issues for traffic. Bottle neck at David Terrace (discussed issues as listed within written submission). Concerned about traffic from development that would have on David Terrace access* • *Wants best practice value adding to the site – win-win for residents, future residents and return on investment for developer. Believes development on the site should value-add to neighbourhood too.* • *Scope and scale should not proceed as now proposed. Supports DPA intent for residential use, but scale inappropriate* • *Commercial and retail sustainability is of concern – duplication with nearby centres.* • *Traffic impact study – grossly understated traffic volumes – didn't take into account West Croydon precinct – shortcuts and alternative access / rat-running* • *Wants a demonstration project and best practice outcomes.*	• Noted. The draft DPA seeks to address the concerns of the community about the development of this site. • Noted. This is addressed through consideration of built form and traffic impacts assessment undertaken as part of the draft DPA investigations. Further work undertaken by GTA has confirmed that a reduced commercial and residential yield can achieve maximum desired traffic volume within local street network. The draft DPA will seek a reduced yield (around 300 dwellings from the 500 originally indicated). • Agree. The draft DPA policy seeks to ensure that this is achieved. Provision of open space, commercial uses and stronger connections to the station (and greenway) aid in this. • Noted. See comment above in relation to yield reduction. Council has also reduced the height of the buildings from 5 storeys down to four storeys for the part of the site south of Pinda Street. • Noted, retail capacity has been reduced within proposed zone amendments, also facilitated by traffic volumes needed to be

			accommodated. Should maintain local scale and not impact adjacent centres. • Traffic assessment has been updated to reflect potential rat-running through West Croydon and updated volumes and forecast distribution provided to inform outcome. Reduced yield aids in ensuring local road capacity is maintained. • Noted. This is outside the scope of the DPA.
2.	Michael Blanch Director, Operations Asia Pacific Region OI Glass (Written submission also provided – refer submission 25 Also speaking in response to questions on behalf of OI Glass: • Richard Dwyer, Managing Director Ekistics • James Levinson, Botten Levinson	• *OI is supportive of site being redeveloped – agree its an eye sore. Don't agree with rezoning for high density living – regardless of number of storeys.* • *Close proximity to our site - 25m from glass warehouse and 40 metres from plant – is a recipe for conflict. They are a 24-hour operation with a continuous flow process- can't turn things off in evenings. It is Inevitable neighbours will complain about plant* • *Faced with tougher restrictions and need for new infrastructure – has significant cost implications for them. Invested significantly to meet expectations of shifting community profile around them. Consulted extensively with community over time. Acoustic wall is result of this previous consultation. Continue to have ongoing conversations with community groups. There are still some issues to iron out. Currently meet operational requirements in tight market. Needing to spend more to address noise issues will make them uncompetitive which will have significant flow on effects.* • *Supplies 360 million wine bottles annually – $154million to GDP. 468 people employed – from surrounding neighbourhood. Warehouse – additional $40 million investment, DPA could be beginning of the end for them.* • *Please consider other options to site under existing zoning*	• OI's support for the redevelopment of the site is noted despite the objection to the final format of the development facilitated by the draft DPA. A revised built form is proposed – refer to address concerns raised. • Council acknowledges the proximity of the adjacent OI facilities and their 24 hour operation and this is why the investigations supporting the draft DPA have carefully considered the implications of this for air and noise emissions for the subject land. It is considered that the policy supporting the SEC criteria within the Minister's Specification will address concerns relating to noise for internal environments. • OI's commitment to working with the surrounding community is noted and appreciated by Council. It is not considered that the draft DPA will result in OI needing to undertake further work to their plant and equipment. Rather, the onus on addressing the impacts at the interface is placed on the proponent of the affected area, and this is reflected within the policy being applied by the draft DPA. Of significance, this is also supported by the policies likely to be applied to the site by the Planning and Design Code

			(Interface Management Overlay) and the Concept Plan map. • Council acknowledges and supports O-I's contribution to the State and local economy and does not seek to compromise its ability to operate from the site under current licence conditions. It is not considered that the draft DPA will alter this due to the range of policy measures put in place within the draft DPA relating to noise and this position has been confirmed by the EPA.
3.	Tanja Radjenovic 8 Sacksville Street West Croydon Also on behalf of 2, 4, 6, and 8 Sackville St	• *Support for development but not 5 storeys. Open to other reasonable redevelopment – no more than 3 storeys.* • *Concerned about traffic and parking. Since reserve was developed, high demand for parking – access difficult from their driveways - New development will make this even worse.* • *Concerned about utilities – capacity able to cope / be upgraded?* • *New development will not have green space – park will be used – not fair as everyone needs yard space – no rules for them compared to others that exist* • *David Terrace / Kilkenny Road overloaded – wait 5 to 10 minutes to get into side streets – wasn't the case when first moved into area – not sure why but last couple of years noticed this* • *Developers need to think outside of the box – underground car parks, rooftop gardens – what will make it more acceptable for current residents*	• Noted. The site is a strategic location where more intense and higher built forms are appropriate to support increased population. To mitigate concerns, a reduced height is proposed to the built form down to four storeys and limiting this to the southern side of Pinda Street, where it is located away from adjacent residential areas and screened by future development on the site. • Noted. The assessment by GTA has considered local street function, including capacity of streets to accommodate traffic volumes. Further reductions in yields has facilitated a reduction in traffic volumes that align with Council's Transport Strategy for local streets of this nature. • Additional upgrades to infrastructure would need to be funded by the developer upon the development itself and will be influenced by the format and yields sought. This will be dealt with as part of any development application. • Noted. There remains a need for housing to be provided with private open space per dwelling. The draft DPA does not alter that requirement. However, there has been

			strong position from submissions that public open space should be provided. As such, provision of open space is being sought for the development site, as per the Development Regulations, 2008. • Noted. The traffic assessment has utilised latest data from DPTI to determine traffic impacts from the development of the site. • Noted. The policy supports basement or undercroft parking solutions, particularly for multi-storey development, and there is support for the provision of roof top / communal open space within developments as well that exists within the Development Plan.
4.	David Mills and Ms Jane L Sage 12 Wilpena Terrace, Kilkenny Written submission also provided – refer submission 49	• *Most concerns already been captured* • *People don't necessarily understand the village layout of the streets in this area. Study states 2440 additional vehicles - has not captured the amenity impacts and width of the street and proximity to dwellings. Would like this considered*	• Noted. See above comments. • Noted. The assessment by GTA has considered local street function, including capacity of streets to accommodate traffic volumes. Further reductions in yields has facilitated a reduction in traffic volumes that align with Council's Transport Strategy for local streets of this nature.
5.	David & Sheryl Kennedy 19 Wilpena Terrace, Kilkenny Written submission also provided – refer submission 54	• *Not against development of site – residential or commercial – welcomed.* • *Lives not far from glass factory and done good job in dealing with residents – does not hear or smell anything – only trucks on David Terrace* • *1200 cars down Wilpena Terrace and Mundulla Street not going to work – concerned about conflicts now. Too many cars for few streets – not designed for that much traffic* • *Home is 1.2m away from road – cars and trucks impact on home – structural integrity (footings) etc – similar to other properties in area. Employed structural engineers and transport engineers to prepare dilapidation report – concerned about damage to his building due to traffic*	• Noted • Noted • Noted. The assessment by GTA has considered local street function, including capacity of streets to accommodate traffic volumes. Further reductions in yields has facilitated a reduction in traffic volumes that align with Council's Transport Strategy for local streets of this nature. • Noted. It is not expected that traffic would impact on a dwelling in such a manner, noting that current zoning supports significantly larger and heavier vehicles in

		• *Need to have a different thoroughfare for that site. Pinda and Mundulla an issue. Needs to address growth in traffic volumes – consider bridge or underpass from this to Port Road – to take this traffic.*	this location (as has been case in the past). Nevertheless, structural issues of this nature are outside the scope of the Development Plan itself. • Noted. Alternative access difficult due to constraint posed by the rail line and crossing in this location. DPTI have confirmed that they would not accept reopening the Wilpena Street junction adjacent the rail crossing (due to safety), nor entertain any crossings over the rail for connection to Port Road through Aroona Road. Underpasses and bridges are unlikely to be financially viable for the volumes in question. On the basis of a revised policy scenario this presents a reduced impact on the local road network. The revised Traffic Impact Assessment concluded that there is adequate capacity in the surrounding road network to cater for the additional traffic based on the amended policy and therefore alternative access arrangements are not considered warranted.
6.	Simon Peters 18 Wilpena Terrace, Kilkenny Written submission also provided – refer submission 56	• *Primary concern is traffic management. 1200 vehicles accessed by two narrow roads is not going to work. People will go up Aroona Terrace and Alfred Road to Rosetta Street. This is difficult site for this scale of development. 7:30 – 9am – boom gates (3 and 9 minutes) – left turn from Mundulla – traffic banks up 3 or 5 blocks – likely to rat-run down Wilpena and circumnavigate the suburb. 1200 people – also consider guests – where do they park?*	• These issues are addressed in previous submission responses. See comments above.
7.	Simon Johnson 17 Tarcowie Street, Kilkenny Written submission also provided – refer submission 58	• *Too large in scale. Smaller sale development would address many of the issues. Model development that would not have amenity impacts on area rather than maximum yield.*	• These issues are addressed in previous submission responses. See comments above.

		• *Modelling is mainly about traffic to Kilkenny Road – not modelling to rat running in report – flaw – Council should consider this and model it.* • *Roadside parking used to spill out to his street when industry was operating – likely to happen again. Most parking relies on street – limited parking now.* • *Contribution to open space – McInerney Reserve is an asset – this proposal will overload the reserve – should be at least a contribution from the development – more than path or greenway.*	• These issues are addressed in previous submission responses. See comments above. • These issues are addressed in previous submission responses. See comments above. • These issues are addressed in previous submission responses. See comments above.
8.	Sue Johnson 17 Tarcowie Street, Kilkenny Written submission also provided – refer submission 59	• *Not opposed to development.* • *Currently it is an unattractive site but definitely seeking built form at a lower level.*	• Comments Noted. The issue of building heights and proposed reduction is addressed in previous submission responses. See comments above.
9.	Leeahna Johnson 17 Tarcowie Street, Kilkenny Written submission also provided – refer submission 61	• *Mainly on-street parking. Former St Clair resident where cars spilled out into St Clair Blvd– visitors couldn't get a car park – had issues getting in and out of car park – likely similar impacts will be had here. Little street parking as it is now* • *Concern about height- overlooking into yards – also experienced in St Clair – concerned about privacy.* • *Not opposed to development – has been lots of issues with behaviours and the dilapidated site*	• These issues are addressed in previous submission responses. See comments above. • These issues are addressed in previous submission responses. See comments above. • Noted.
10.	Linda Maller 6 Aroona Road, West Croydon Written submission also provided – refer submission 66	• *Was visible but no audio so could not speak. But confirmed that Elected Members re-read her submission and consider her concerns. She confirmed that she was comfortable with this (via gesture presumably)*	• Noted.
11.	Minh Tan Pham on behalf of Hon. Peter Malinauskas PM No written submission received however expressed a desire to speak.	• *Role to advocate on behalf of residents – agrees something needs to be done for the site* • *Concerns being raised in written submissions – top 3 concerns – traffic increase, high density and increased population, insufficient parking spaces.* • *Concern for no additional public open space, consider McInerney reserve expansion*	• Noted. • These issues are addressed in previous submission responses. See comments above.

		• *Infrastructure* • *Inconsistent design for neighbourhood character* • *Environmental impact of development*	• These issues are addressed in previous submission responses. See comments above. • These issues are addressed in previous submission responses. See comments above. • The draft DPA proposes a reduced built form. The proposed reduction in built form is considered appropriate to further improve the transition between the draft DPA Affected Area and the adjacent residential area. • The proposed development will result in the rehabilitation of the site and will need to be assessed against policy which seeks passive solar design, stormwater re-use and retention and landscaping that supports biodiversity, all of which is already contained within the existing policy.
12.	Christine Graham 14 Alfred Road West Croydon Written submission also provided – refer submission 65	• *Density is totally inconsistent with the nature of the community. Totally out of scale – an amendment needed to the DPA* • *Impact on traffic. Traffic survey didn't include the West Croydon area – quite a deficiency of the survey. Alfred Road has experienced increased traffic – mainly thorough from Kilkenny wanting to avoid railway crossing and congested David Terrace – Rosetta St bypasses railway line. Alfred Road was upgraded a few years ago and traffic flow has increased since then.* • *Extra driveways reduced potential for on-street parking* • *Open space – unacceptable that open space is not provided because of proximity to McInerney reserve.* • *Limited space for planting trees due to high density.*	• The intent of the draft DPA is to provide for increases in density and facilitate increased height in this strategic location. This requires variation from the established character of surrounding areas. However, a reduction in yields and building heights across the site have been proposed and will be reflected in the updated policy. • This issue has been addressed in previous submission responses. See comments above. • Refer to comments in Row 1.3. • This issue has been addressed in previous submission responses. See comments above. • The draft DPA through the consultation process, included policy which desires a greenway connection adjacent to the railway

			line. This area would make up a portion of the legislation requirement for public open space (12.5%). Policy amendments are also recommended in the draft DPA for the desire of additional public open space in the form of a local park to provide the full public open space physical contribution. The policy desire for these areas of public open space provides provide opportunity for trees and smaller vegetation to be planted.
Other respondents who originally indicated their wish to be verbally heard but did not speak or attend.			
13.	Matt Lazarus 2/195 Military Road, Henley Beach South Written submission also provided – refer submission 5	• Did not attend / speak when called.	
14.	Nicholas Folland 19A Tarcowrie Street, Kilkenny Written submission also provided – refer submission 32	• Attended / Did not desire to speak.	
15.	Ross McNaughtan 25 Wilpena Terrace, Kilkenny Written submission also provided – refer submission 62	• Attended / Did not desire to speak.	
16.	Tracey Davis and Eugene Suleau 79 Wilpena Terrace, Kilkenny Written submission also provided – refer submission 74	• Attended / Withdrew desire to speak.	

Attachment C – Timeframe Report

SCPA Timeframe Report: Process B1 – with consultation approval

The SOI was agreed by the Minister and Council on 17 October 2019

Key steps	Period agreed to in SOI	Actual time taken	Reason for difference (if applicable)
Investigations conducted, DPA prepared and submitted for approval to commence concurrent agency and public consultation	3 months	10 months	Additional time required to procure consultants, liaise with relevant Agencies on the outcomes of the investigations before finalising the draft DPA for consultation.
DPA prepared for agency and public consultation	4 weeks	7 weeks	Consultation date delayed avoiding the Christmas and New Year period.
Agency and public consultation period (report on any delays incurred by agencies)	8 weeks	8 weeks	N/A
Public Hearing held, submissions summarised and DPA amended in accordance with Council's assessment of submissions. Summary of Consultations and Proposed Amendments submitted to Minister for approval.	6 weeks	11 months	Additional time required to review submissions given the volume of submissions received and complexity of issues raised and time required to undertake further investigations, seek advice from Agency's in particular the EPA and the Planning and Land Use Services Department in relation to proposed policy amendments post consultation and the transition of policy into the Planning and Design Code.

Schedule 4a Certificate

CERTIFICATION BY COUNCIL'S CHIEF EXECUTIVE OFFICER

DEVELOPMENT REGULATIONS 2008

SCHEDULE 4A

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

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

I Paul Sutton, as Chief Executive Officer of the City of Charles Sturt, certify that the Statement of Investigations, accompanying this DPA, sets out the extent to which the proposed amendment or amendments-

(a) accord with the Statement of Intent (as agreed between the City of Charles Sturt and the Minister under section 25(1) of the Act) and, in particular, all of the items set out in Regulation 9 of the *Development Regulations 2008*; and

(b) accord with the Planning Strategy, on the basis that each relevant provision of the Planning Strategy that related to the amendment or amendment has been specifically identified and addressed, including by an assessment of the impacts of each policy reflected in the amendment or amendments against the Planning Strategy, and on the basis that any policy which does not fully or in part accord with the Planning Strategy has been specifically identified and an explanation setting out the reason or reasons for the departure from the Planning Strategy has been included in the Statement of Investigation; and

(c) accord with the other parts of the Development Plan (being those parts not affected by the amendment or amendments); and

(d) complement the policies in the Development Plans for adjoining areas; and

(e) satisfy the other matters (if any) prescribed under section 25(10)(e) of the *Development Act 1993*.

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

Jim Gronthos

DATED this 20 day of 1 2020

.....

Paul Sutton
Chief Executive Officer
City of Charles Sturt

Attachment E – Schedule 4B Certificate

Schedule 4B—Certificate—section 25(14)(b)

Certificate of chief executive officer that an amendment to a Development Plan is suitable for approval

I, Paul Sutton, as Chief Executive Officer of the City of Charles Sturt, certify, in relation to the proposed amendment or amendments to Charles Sturt Council Development Plan as last consolidated on 14 January 2021, referred to in the report accompanying this certificate—

(a) that the Council has complied with the requirements of section 25 of the Development Act 1993 and that the amendment or amendments are in a correct and appropriate form; and

(b) in relation to any alteration to the amendment or amendments recommended by the Council in its report under section 25(13)(a) of the Act, that the amendment or amendments (as altered)—

(i) accord with the Planning Strategy, on the basis that each relevant provision of the Planning Strategy that relates to the amendment or amendments has been specifically identified and addressed, including by an assessment of the impacts of each policy reflected in the amendment or amendments against the Planning Strategy, and on the basis that any policy which does not fully or in part accord with the Planning Strategy has been specifically identified and an explanation setting out the reason or reasons for the departure from the Planning Strategy has been included in the report of the Council; and

(ii) accord with the other parts of the Development Plan (being those parts not affected by the amendment or amendments); and

(iii) complement the policies in the Development Plans for adjoining areas; and

(iv) satisfy the other matters (if any) prescribed under section 25(14)(b)(ii) of the Development Act 1993; and

(c) that the report by the Council sets out a comprehensive statement of the reasons for any failure to complying with any time set for any relevant step under section 25 of the Act; and

(d) that the following person or persons have provided professional advice to the Council for the purposes of section 25(13)(a) of the Act:

Date:

.....

Paul Sutton
City of Charles Sturt
Chief Executive Officer

Attachment F – Additional Investigations and Agency Advice

REF: S163871

DATE: 12 October 2020

Jensen Plus
Level 2, 21 Roper Street
ADELAIDE SA 5000

Attention: Mr. David Barone (Associate)

Dear David,

RE: KILKENNY MIXED USE DPA IN RESPONSE TO CONSULTATION

Background

The City of Charles Sturt (Council) has recently consulted with Government agencies and the broader community regarding the draft mixed use Development Plan Amendment (DPA) within Kilkenny. One of the key concerns raised by the surrounding Croydon and Kilkenny communities was the increased housing density proposed within the DPA and the additional traffic that this will generate.

In response to the submissions, a revised development mix is being considered with reduced building heights, reduced areas for non-residential development and increased public open space. This letter report considers the proposed revisions to the DPA and specifically:

- The projected future traffic volumes on the local road network in consideration of Council's desired local road capacity volumes of 1,500 vehicles per day; and
- Assessment of additional routes that development traffic may seek to use to access the DPA site including Aroona Road and Alfred Street through to Rosetta Street.

Revised Land-use

Previous Development Mix

The previous development mix assessed as part of the original DPA report consisted of the following:

- 500 residential dwellings – comprising of:
  - 100 townhouses
  - 400 apartments
- 1,400 sq.m of retail space
- 1,400 sq.m of commercial space

Revised Development Mix

In response to the consultation, the revised development mix is now proposed to consist of the following:

- 301 residential dwellings - comprising of:
  - 11 dwelling houses
  - 240 apartments
  - 50 townhouses

VIC | NSW | QLD | SA | WA
Level 5, 75 Hindmarsh Square
ADELAIDE SA 5000
PO Box 119
RUNDLE MALL SA 5000
t// +618 8334 3600
ABN 66 137 610 514
www.gta.com.au

- 250 sq.m retail space
- 1000 sq.m commercial space

An overview of the revised land uses is shown in Figure 1. The hatched area indicates the proposed retail and commercial zone fronting David Terrace.

Figure 1: Revised Land-use Layout



Traffic generation

Previous Development Mix Estimated Traffic Generation Volumes

Previous traffic generation rates have been sourced from the Roads and Maritime Services of New South Wales (formerly RTA) "Guide to Traffic Generating Developments – updated traffic surveys 2013".

The applicable daily and peak hour rates and traffic generation for previous development mix are presented in Table 1.

Table 1: Previous Development Mix Daily and Peak Hour Traffic Generation Rates

Use	Size / Number	Daily Rate	Daily Traffic Generation	Peak Rate	Peak Traffic Generation
Residential	500	5 trips per unit	2,500	0.5 trips per unit	250
Retail	1,400sq.m	55.5 trips/100sq.m	777	5.6 trips/100sq.m	78
Commercial	1,400sq.m	10 trips/100sq.m	140	2 trips/100sq.m	28
		Total Vehicle Movements:	**3,417 Trips** (Daily)		**356 Trips** (Peak Hour)

A total of 3,417 daily trips and 356 trips during a peak hour were expected from the previous development mix.

Revised Development Mix Estimated Site Generated Volumes

The revised development mix has split the residential use into dwelling houses, apartments, and townhouses along with a reduction in the total number of dwellings from 500 to 301. The retail and commercial space has also been reduced from a combined 2,800sq.m to 1000sq.m of commercial space and 25sq.m of retail space. Traffic generation rates for the new residential dwelling formats have been sourced from the Roads and Maritime Services of New South Wales (formerly RTA) "Guide to Traffic Generating Developments – updated traffic surveys 2013".

The applicable daily and peak hour rates for the revised development mix along with the traffic generation volumes and change in trips from the previous development mix traffic generation are presented in Table 2.

Table 2: Revised Development Mix Daily and Peak Hour Traffic Generation Rates

Use		Size / sq.m	Daily Rate	Daily Traffic Generation	Change (Trips)	Peak Rate	Peak Traffic Generation	Change (Trips)
Residential	Dwelling House	11	9 Trips per dwelling	99	(-876)	0.85 Trips per dwelling	9	(-88)
	Apartment	240	5 Trips per unit	1,200		0.5 Trips per unit	120	
	Townhouse	50	6.5 Trips per dwelling	325		0.65 Trips per dwelling	33	
Retail		250sq. metre	55.5 Trips/100sq.m	139	(-638)	5.6 Trips/100sq.m	14	(-64)
Commercial		1000sq. metre	10 Trips/100sq.m	100	(-40)	2 Trips/100sq.m	20	(-8)
		Total Vehicle Movements:		1,863 Trips	(-1,554)		196 Trips	(-160)

The revised development mix is expected to generate an estimated 1,863 daily vehicles movements and 196 trips in a peak hour period. This is a reduction of 1,554 trips daily and 160 during a peak period from the original DPA proposal.

Traffic Distribution

The directional distribution of traffic generated by the revised land-uses will be influenced by several factors, including the:

- Configuration of the road network in the immediate vicinity of the site
- Surrounding employment centres, retail centres and other destinations in relation to the site
- Configuration of access points to the site

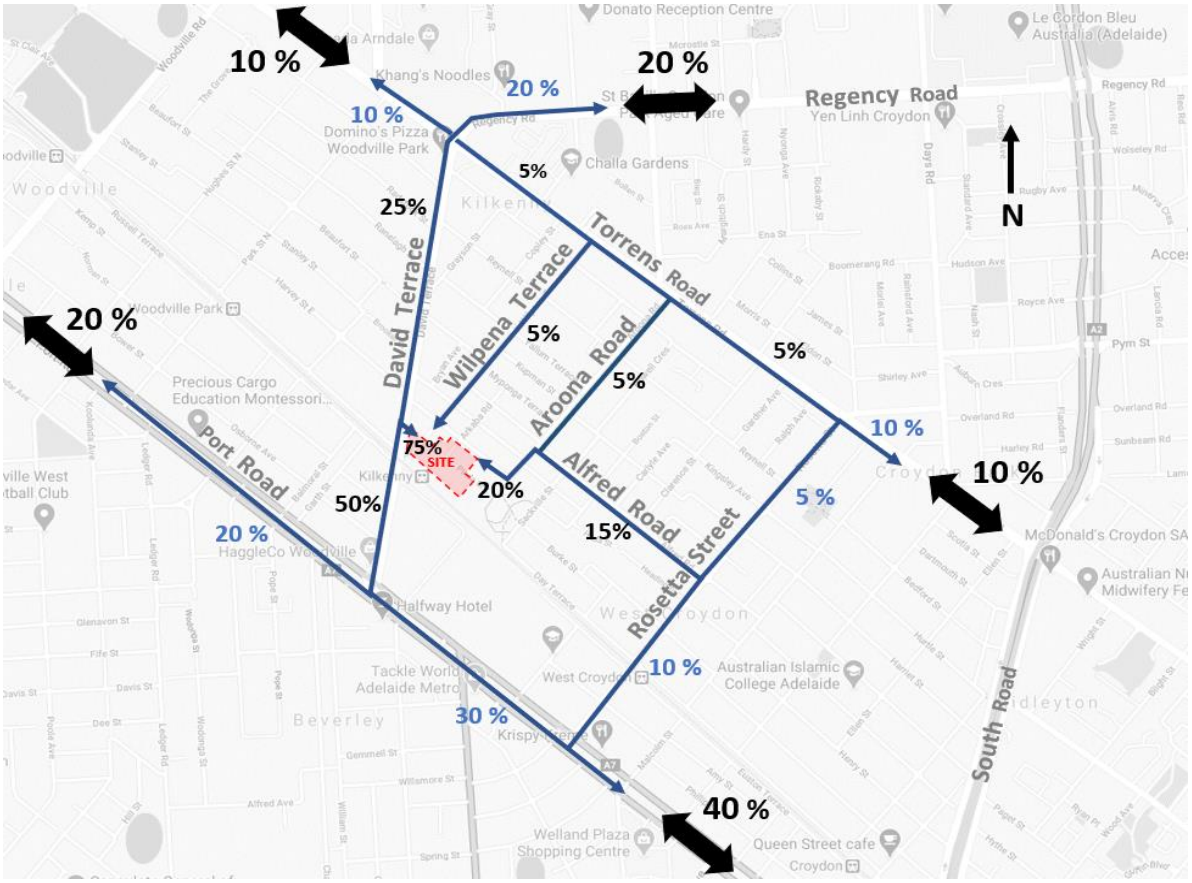
As part of the previous DPA assessment future changes to Pinda Street included a proposal to ban right in/right out movements and retain only left in/left out movements. Due to this arrangement, all right in/right out movement from David Terrace is assumed to occur at Mundulla Street.

Having consideration to the above, the estimation of the directional distributions for departing/arriving vehicle movements are as follows:

- 50% will use Mundulla Street
- 25% will use Pinda Street
- 5% will use Wilpena Terrace
- 5% will use Aroona Road
- 15% will use Alfred Road

The previous report did not consider the same extent of overall traffic distribution on the road network as has now been considered, with a proportion of development traffic now distributed to Aroona Road and Alfred Road. This has led to changes to the percentages distributed to the local road network that was previously considered. A revised distribution model has been prepared and considered all roads within the vicinity of the development to produce a detailed analysis of the expected traffic distribution. An overview of the overall traffic movement distribution is shown in Figure 2.

Figure 2: Overall Traffic Movement Distribution

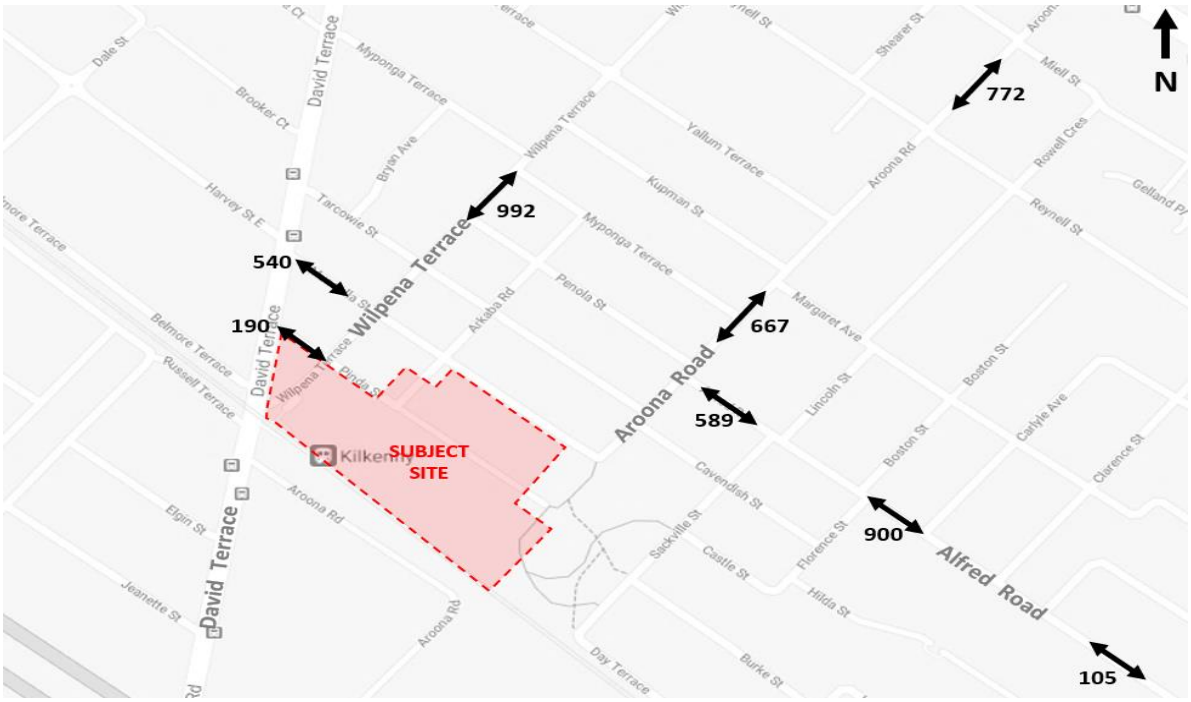


Traffic Volume Movements

Existing Traffic Movements

Recent traffic volume counts were received from council at eight (8) different locations. The locations of each traffic count and the two-way daily traffic movements are shown in Figure 3.

Figure 3: Existing Two-way Daily Traffic Movements



Revised Development Traffic Generation Movements

Based on the revised land-use trip generation and distribution of vehicle movements on the surrounding local road network, the projected daily two-way traffic volumes from the DPA site are shown in Figure 4.

Figure 4: Development Generated Two-way Daily Traffic Movements



Combined Existing and Development Two-way Daily Traffic Movements

The results of the combined traffic volumes along the surrounding network are shown in Figure 5.

The total volumes of existing and DPA generated traffic generated indicate that the highest volumes could be expected on Mundulla Street immediately south of David Terrace and at the southern end of Alfred Street. Traffic volumes of Mundulla Street would comprise a higher proportion of development traffic but would still be expected to be around or below 1,449 vehicles per day. This volume is below that considered in the previous DPA report, which showed that the intersection with David Terrace would still operate with acceptable queues and delays.

On Alfred Road, it can be seen traffic volumes increase further south on Alfred Road. Close to Rosetta Street the volume could be expected to approach 1,338 vehicles per day, however, a high proportion of the total traffic at this location will relate to other road users already on the network.

Figure 5: Combined Existing and Traffic Generated Two-way Daily Traffic movements



Traffic Impact Assessment

The total traffic generation for the revised development mix is estimated at 1,863 daily trips and 196 trips in a peak hour. This is a reduction of 1,554 daily trips and 160 peak hour trips when compared to the previous development mix.

As a result of the proposed changes to the level of development, the surrounding local road network is expected to remain below 1,500 vehicles per day (vpd).

Based on the above, the revised development mix is expected to be accommodated within the local road network without a significant negative impact on the wider local road network, reflecting that

historically the local road network would have accommodated traffic associated with the previous industrial use on the site.

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 Froggatt
Associate Director

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 496-206

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

Dear Mr Gronthos

Kilkenny Mixed Use Development Plan Amendment - Post consultation review

Thank you for providing the Environment Protection Authority (EPA) with the opportunity to provide further comment on its 5 May 2020 response to the Kilkenny Mixed Use Residential and Commercial Development Plan Amendment (DPA).

Council requested the EPA to confirm its response to the DPA that there is sufficient policy within the *Charles Sturt Council Development Plan* (Consolidated 13 February 2020) and proposed within the DPA to enable assessment of noise and air quality issues at the development application stage. The request from Council comes in response to a submission on the DPA made by Owens-Illinois (O-I), a landholder adjacent the area proposed to be rezoned through the DPA.

The EPA reviewed the DPA and the O-I submission and confirms its previous advice that there is sufficient policy proposed in the DPA and within the *Charles Sturt Council Development Plan* to enable noise and air quality issues to be considered when assessing future development applications.

However, as part of the DPA process Council may wish to seek from the proponent further details as to how noise impacts from industrial noise sources would be addressed to ensure that external amenity from industrial noise can be achieved. There may also be an opportunity to explore the potential use of the 'Significant Industry Interface Overlay' which has been incorporated within the live version of the Phase 2 Planning and Design Code in rural areas of the state.

More detailed comments are made below for your consideration.

Noise

The O-I submission included a letter from Resonate Acoustics which was engaged to perform a reverse acoustic amenity risk assessment on the subject DPA (Reference: A190829LT1B; dated

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January 2020). Resonate Acoustics provided comments on the Sonus Report (Reference: S5913C4; dated July 2019) and disputed some of the claims made in the report.

The summary provided by Resonate Acoustic is mostly accurate. Although the Minister's Specification SA78B may provide a good level of internal amenity, it does not include external amenity and is not required to be implemented for impacts from industrial noise sources.

The DPA notes that the warehouse to the south of the subject site is proposed to operate 24 hours per day and will be serviced by semi-trailer trucks loading and unloading on the north loading dock. This potentially exposes the subject site to a significant amount of noise during the night time hours. A 1.8m high acoustic fence was proposed to attenuate noise for existing residential receivers. No consideration was provided to possible receivers in the area affected by the DPA. The Sonus Report modelled noise from the proposed warehouse at potentially above 65dB for night time external noise levels at the closest locations (Figure 4 of the Sonus report). This is significantly above the levels that are to be expected at a suburban activity node. Furthermore, with the proposed buildings next to the southern noise sources planned to be 3-5 storeys, the 1.8m high acoustic fence proposed by the warehouse is unlikely to be effective in mitigating noise impacts for receivers on higher floors.

However, with sufficient siting and land use planning, this issue may be alleviated. In accordance with Figure 1 in the DPA, it is noted that buildings alongside the rail line are planned to be mixed use in nature 3-5 storeys high. With good planning, this can be utilised to the advantage of the subject land by using these tall buildings as a form of acoustic barrier for sensitive receivers within the affected area. This is noted within the DPA where it is stated on page 52 that 'The acoustic implications are linked to, and similar to those of the O-I Glass facility, and can be addressed through appropriate design and construction of dwellings within the affected area in the same way noise from the O-I facility can be mitigated'. The EPA agrees with this point; however, there do not seem to be any further details on how this would be achieved.

Without further information, the proposed DPA may be potentially exposing its future residents in the area to excessive noise from industrial land use that is proposed to operate 24 hours a day.

As advised in the EPA's response to the DPA on 5 May 2020, it is noted that the Desired Character statement for the Suburban Activity Node Zone identifies that development should be sited, designed and constructed to mitigate potential impacts from the O-I Australia glass manufacturing facility. It is also proposed that the Noise and Air Emissions Overlay be applied to the site. In addition, the *Charles Sturt Council Development Plan* (consolidated 13 February 2020) contains Interface between Land Uses policies to ensure noise matters are assessed in any future development applications.

The EPA notes that there is sufficient policy proposed within the DPA and already existing within the *Charles Sturt Council Development Plan* to enable the potential impacts of noise to be assessed at the development application stage. However, as part of the DPA process Council may wish to seek from the proponent further details as to how noise impacts from industrial noise sources would be addressed to ensure that external amenity from industrial noise can be achieved.

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There may also be an opportunity to explore the potential use of the 'Significant Industry Interface Overlay' which has been incorporated within the 31 July 2020 version of the Phase 2 Planning and Design Code in rural areas of the state. This Overlay expressly deals with the protection of significant industries and may provide more scope for specific design measures (such as acoustic targets for sensitive receivers), particularly given Minister's Specification SA78B does not apply to industrial noise sources. It may be beneficial to discuss the intended application of this Overlay with Planning and Land Use Services (formerly DPTI), and determine if its application around O-I could provide a mutually acceptable policy setting to assess future development applications.

Air Quality

The DPA included an air quality assessment undertaken by Enviroscan (Report No: 18- 0332; dated 8 March 2018). The O-I submission included a peer review of the Enviroscan report by Assured Environmental (AE) (Ref: 11438; dated 5 July 2018).

The EPA had previously reviewed both the Enviroscan and AE reports, but has again reviewed them and provides comment on each below.

Enviroscan (Report No: 18- 0332; dated: 8 March 2018)

Enviroscan undertook an assessment of the potential air quality impacts at the proposed redevelopment site, particularly from the O-I glass manufacturing plant located nearby on Port Road.

The EPA had requested that modelling be done at height as well as a standard assessment at ground level in order to understand the potential impact of air quality on sensitive receivers at all levels of the residential buildings.

At the time of modelling only AD5 glass furnace was operational, with AD2 and AD6 glass furnaces being mothballed. Enviroscan was requested by the EPA to assess air quality impacts from the O-I Adelaide Plant with the AD5 glass furnace in operation together with resumption of the AD2 and AD6 glass furnaces. It was the EPA's understanding that that represented what O-I had approval for in undertaking their operations. The modelling was based on emissions data made available by O-I at the time. Consequently, this is a very conservative approach to modelling.

The modelling was considered by the EPA to have met the requirements of the EPA's *Ambient Air Quality Assessment* (2016) publication.

Assured Environmental Peer Review (Ref: 11438; dated: 5 July 2018)

AE were contracted by O-I to undertake a review of the Enviroscan assessment report, and raised the following concerns:

1. The methodology adopted by Enviroscan was considered simplistic.
2. Enviroscan failed to provide justification for adopting Ausplume as the air dispersion model.
3. Enviroscan did not justify the chosen meteorological dataset.

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4. The assessment was deficient or failed to justify the estimated emissions from the O-I land.
5. The assessment was deficient or failed to justify the assumptions of flat terrain.
6. The assessment was deficient or failed to justify the selection of background data.

The issues raised by AE were addressed previously by the EPA in a letter to Mr Craig Daniel, City of Charles Sturt, on 24 August 2018.

In its submission on the DPA, O-I opposed the rezoning citing the issues identified in the AE peer review. The EPA provides the following comments on the issues raised in the AE peer review.

1. The methodology adopted by Enviroscan was considered simplistic

AE expressed concern in the peer review about terrain variations, which appears to be the basis of the criticism that the use of Ausplume was not appropriate. AE provided a contour map of the area showing a significant variation in terrain heights between the O-I site and the proposed rezoning site. This information was incorrect as the terrain in the area is flat. While acknowledged by the EPA as a simplistic model, Ausplume does provide considerations for terrain effects on dispersion as 'surface roughness factors' and the EPA understands that an appropriate roughness factor was adopted. Furthermore, Ausplume is also considered to be a more conservative model than Calpuff and, as a consequence, the EPA accepted and continues to accept Ausplume as an appropriate model for this work.

2. Enviroscan failed to provide justification for adopting Ausplume as the air dispersion model

This has been answered in response to issue no.1.

3. Enviroscan did not justify the chosen meteorological dataset

The use of the 2009 meteorological dataset in air quality modelling, as was used in the Enviroscan assessment, has been an expectation of the EPA for about eight years as it is a 'typical year'. Ensuring the use of the 2009 meteorological dataset has provided consistency in modelling. Furthermore, the terrain differences between the area proposed to be rezoned and the Bureau of Meteorology site does not concern the EPA. Whilst there may be some differences between the data from the Bureau of Meteorology site 5km away and that generated for the site using TAPM, it is expected that the differences would be minimal with insignificant differences at ground level.

Consequently, the EPA believes that the meteorological dataset used was appropriate.

4. The assessment was deficient or failed to justify the estimated emissions from the O-I land

The emissions data was provided by O-I itself and was the best information available at the time.

5. The assessment was deficient or failed to justify the assumptions of flat terrain

This has been answered in response to concern no.1.

6. The assessment was deficient or failed to justify the selection of background data.

The background data used was derived from available EPA data at the time. The information from

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the EPA monitoring network indicates that the levels of fine particles at Netley have since reduced. The EPA was satisfied that a background of 7.2µg/m^3 for $PM_{2.5}$ was a reasonable and conservative number to adopt for this site, and sees no reason why this is an underestimate.

Air Quality Conclusion

The EPA acknowledges that air dispersion modelling, by its very nature, is a prediction only as good as the assumptions made for the inputs into the model and the appropriateness of the chosen model. The model is a mathematical algorithm and, as such, could never be an exact prediction. As a consequence, the EPA's expectation is to input conservative data, which the EPA believes has been done by Enviroscan, to ensure that under-prediction is highly unlikely.

Air dispersion modelling remains the best available method to undertake such predictions, and the EPA still believes that AE's concerns do not sway the basic findings of the predictions of the Enviroscan report in support of the rezoning.

As advised in the EPA's response to the DPA on 5 May 2020, it is noted that the Desired Character statement for the Suburban Activity Node Zone identifies that development should be sited, designed and constructed to mitigate potential impacts from the O-I Australia glass manufacturing facility. It is also proposed that the Noise and Air Emissions Overlay be applied to the site. In addition, the *Charles Sturt Council Development Plan* (consolidated 13 February 2020) contains the appropriate Interface between Land Uses policies to ensure air quality matters are assessed in any future development applications.

The EPA notes that there is sufficient policy proposed within the DPA and already existing within the *Charles Sturt Council Development Plan* to enable the potential impacts of air quality to be assessed at the development application stage.

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

Yours sincerely

James Cother

PRINCIPAL ADVISER, PLANNING POLICY & PROJECTS

PLANNING AND IMPACT ASSESSMENT

ENVIRONMENT PROTECTION AUTHORITY

7 September 2020

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From:	Cother, James (EPA)
To:	Jim Gronthos
Cc:	Bradford, Geoffrey (EPA)
Subject:	FW: Kilkenny Mixed Use Draft DPA - post consultation review of submissions [DLM=For-Official-Use-Only]
Date:	Wednesday, 9 September 2020 5:42:03 PM
Attachments:	image001.gif image002.gif image003.jpg image004.jpg image005.jpg image006.jpg image009.jpg

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For Official Use Only

Hi Jim,

There is understandably concern from O-I as to the potential impact of the DPA on their business.

However, investigations into the potential impacts of air and noise emissions have been undertaken and the EPA's review and assessment of those investigations gives us some level of confidence that they are either not likely to be an issue (in the case of air quality) or could be addressed through careful application of planning policy and design and engineering solutions (in the case of noise).

Whilst the modelling gives a good understanding of the potential impacts of air and noise emissions, there is no guarantee that there wouldn't be complaints from future residents should the DPA be approved and subsequent development occurs on the affected area. However, with proper planning and design of any future developments the risk can be mitigated.

The EPA does not consider that approval of the DPA would automatically lead to changes to the O-I licence.

Regards,

James

James Cother
Principal Adviser, Planning Policy & Projects

Strategy and Assessment | Planning and Impact Assessment
Environment Protection Authority
Phone (08) 820 42093
211 Victoria Square Adelaide 5000

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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 539-206

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

Dear Mr Gronthos

Kilkenny Mixed Use Residential and Commercial DPA – Policy Amendments

Thank you for providing the Environment Protection Authority (EPA) with the opportunity to comment on the proposed policy amendments to the Kilkenny Mixed Use Residential and Commercial Development Plan Amendment (DPA).

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.

Noise

The EPA has reviewed the proposed amendments to the DPA as they relate to noise and advises the following.

SA78B Construction requirements for the control of external sound

The EPA supports inclusion of the predicted sound exposure categories within the concept plan. This would allow developers to easily refer to the requirements and ensure that any residential use closer to noise sources have the requirements *of SA78B Construction requirements for the control of external sound* applied.

The EPA advises that the requirements of SA78B does not ensure external noise amenity and is normally not implemented for impacts from industrial noise sources.

Zone Objectives

The proposed objectives for this zone appear to be written so that the primary land use is high

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density residential. From an *Environment Protection (Noise) Policy 2007* (Noise Policy) perspective, the EPA considers that the mixed used areas within this zone are secondary to the residential areas. Therefore, the following day and night indicative noise levels would apply under the Noise Policy to outdoor noise levels within the proposed zone.

Development Plan Zone	**Noise Policy land use category**	**Day Indicative Noise Levels (INL)**	**Night INL**
Urban Employment	Mixed use: General Industry, Commercial	64 dB(A)	55 dB(A)
Suburban Activity Node	Residential	58 dB(A)	50 dB(A)

As worst case noise level predictions are between 57-65 dB(A), external noise may be an issue especially for sensitive receivers fronting the noise source and is unlikely to meet the requirements of the Noise Policy as noted above. Therefore, if the rezoning is approved, the EPA recommends that a qualified acoustic engineer should be engaged to ensure that any future development within the zone is appropriately located, designed and constructed to protect potential residences from such worst case noise levels.

A section of the desired character statement in the DPA states that "office use may be appropriate on upper floors where they provide a buffer between active ground floor and residential activity". As commercial activity is generally less sensitive to noise impacts, this should be reflected within the objectives for the proposed zone.

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

Yours sincerely

Phil Hazell

MANAGER PLANNING AND IMPACT ASSESSMENT
ENVIRONMENT PROTECTION AUTHORITY
1 March 2021

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