Development Plan Amendment

By the Minister

Port Adelaide Enfield Council
Development Plan

Devon Park Residential Development Plan Amendment

Executive Summary and Analysis

For Consultation
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THE AMENDMENT
DEVELOPMENT PLAN AMENDMENT SUMMARY

1 INTRODUCTION

The Minister for Planning has released the Devon Park Residential Development Plan Amendment (DPA) for consultation.

The DPA proposes to the rezone a pocket of industrial land (Entech Electronics Site) within Devon Park to facilitate population growth and opportunities for low to medium density housing options.

HAVE YOUR SAY

The Development Plan Amendment (DPA) is on consultation for eight weeks. Submissions are due by close of business Thursday 19 September 2019.

The Chair, State Planning Commission, c/- Department of Planning, Transport and Infrastructure:

- by post: GPO Box 1815, Adelaide SA 5001, or

The State Planning Commission has been established to act as the state’s principal planning advisory and development body. The Commission will provide advice to the Minister on the DPA.

The Commission will hold a public meeting at 7.30pm Thursday 10 October 2019 at the Fitzroy Community Club (at the Sam Johnson Oval), Swan Court, Renown Park. At this public meeting, the Commission will hear from those people who have indicated in their submissions that they wish to be heard.

If you would like more information on the DPA you can contact the Department for Planning, Transport and Infrastructure on 7109 7007.

Public submissions will be made available on Friday 20 September 2019 following the consultation period.

Following receipt of the Commission’s advice, the Minister will decide whether to approve, amend or refuse the DPA.

This Summary is for information only and does not form part of the formal Amendment to the Development Plan.
THE AREA AFFECTED BY POLICY CHANGE

The area affected by this DPA only comprises the Entech Electronics site of approximately 8060 square metres at Belford Avenue, Devon Park, as shown in the Figure 1 below.

WHY WE ARE CHANGING PLANNING POLICY

The Devon Park area is a long-established industrial area, which has seen recent renewal of residential use into areas previously occupied by general industrial land uses. This has left the remaining industrial areas in the locality somewhat compromised in terms of their industrial function due to the proximity to sensitive land uses and a need to control amenity nuisance.

The Entech Electronics site is one of the last remaining pockets of industrial activity and Industry zoned land in the Devon Park area and is well positioned to accommodate future low to medium density residential development growth. It is understood that greater flexibility is required for Entech’s continued operations than what is presently accommodated at this site. The proponents are investigating opportunities for relocation on this basis. The rezoning of the land will facilitate its sale and therefore the relocation of Entech to a new, more appropriate location suitable for accommodating their ongoing and future needs.

It is considered practical for the land to be rezoned and a policy framework implemented which supports the renewal of the site for low to medium density residential use – particularly as the site is restricted in its ability to support ongoing industrial activity. This supports the urban regeneration and housing supply goals in The 30-Year Plan for Greater Adelaide 2017 to better utilise established urban areas and encourage economic and population growth particularly in proximity to major transport corridors.
4 SUMMARY OF THE ZONE CHANGES

The DPA is proposing to make changes to the Development Plan for the Port Adelaide Enfield Council including:

- Replacing the existing Industry Zone covering the affected area with the Residential Zone.
- Introduce the Medium Density Policy Area 73 to the affected area to support the desired medium density development envisaged in this location.
- Amend the Desired Character Statement of the Medium Density Policy Area 73 to identify and differentiate the applicable design elements of the statement to Angle Park (where it currently applies) and Devon Park (where it is proposed).
- Introduce the Affordable Housing Overlay to the affected area.
- Consequential zone, policy area and affordable housing mapping amendments to reflect the policy changes.

5 LEGISLATIVE REQUIREMENTS

The DPA has been prepared in accordance with requirements of the Development Act, 1993 (Act) and the Development Regulations 2008. The Act provides the legislative framework for undertaking amendments to a Development Plan. The Act allows either the relevant council or, under prescribed circumstances, the Minister for Planning to amend a Development Plan.

In this case, the Minister is undertaking the amendment because they are of the opinion that the matter is appropriate because of a matter which in the opinion of the Minister is of significant social, economic or environmental importance (section 24(1)(g) of the Act).

Prior to the preparation of this DPA, the Minister received advice from a person or persons holding prescribed qualifications pursuant to section 26(3) of the Development Act 1993.
ANALYSIS

1 BACKGROUND

The Devon Park area is a long-established residential area with low density dwellings in proximity to the Adelaide-Gawler rail line and access to large areas of open space. These features have made it attractive for residential investment with the area increasingly being the subject of uplift with subdivision and development of medium density dwellings.

Industrial activity in the area has also evolved, taking on lower impact profiles or choosing to relocate to areas with environments that are more conducive to industrial requirements and impacts. This has resulted in remaining industrial activities, such as the Entech Electronics site at Belford Avenue / Bolingbroke Avenue, becoming increasingly isolated amongst development that is sensitive to the impacts of noise, air quality and heavy vehicle movements.

Entech Electronics is now also looking to relocate, and this provides the opportunity to review the zoning of the 8,000 square metre site as an integral component of the broader residential area. It represents an increasingly rare opportunity for broad hectare development in the inner / middle metropolitan area.

The City of Port Adelaide Enfield has provided in-principle support for the rezoning of the site to residential zoning.

2 THE STRATEGIC CONTEXT AND POLICY DIRECTIONS

Various strategic documents have been considered in preparing this DPA, including overarching State Government Strategic Plans and plans produced by local government. Refer to the References / bibliography list for a comprehensive list of all publications considered. Additional information about the South Australian Planning system and links to relevant key strategic and demographic documents can be found at http://saplanningportal.sa.gov.au/home.

The Strategies and Plans that are most pertinent to planning policy are summarised below as they have a direct influence on the planning policy directions proposed in this DPA

Key findings of other Strategic Plans of relevance have been summarised in Appendix 1 – Strategic Objectives and Priorities.

2.1 Consistency with the 30-Year Plan for Greater Adelaide

The Planning Strategy presents current State Government policy for development in South Australia based on key economic, social and environmental imperatives. It seeks to guide and coordinate State Government activity in the construction and provision of services and infrastructure. It also indicates directions for future development to the community, the private sector and local government.

The 30-Year Plan for Greater Adelaide 2017 (the Plan) is the relevant volume of the Planning Strategy for South Australia and applies to areas affected by this DPA. The Plan has been prepared by the Government to guide the community, local government, business and industry and is consistent with South Australia’s Strategic Plan.

The 2017 update identifies 6 targets, underpinned by a range of policies that will help measure progress on delivering a new urban form and how Greater Adelaide will become a more liveable, sustainable and competitive place. The following are of relevance to this DPA:

Target 1: Containing our urban footprint and protecting our resources
- 85% of all new housing in metropolitan Adelaide will be built in established urban areas by 2045.

Target 2: More ways to get around
- 60% of all new housing in metropolitan Adelaide will be built within close proximity to current and proposed fixed line (rail, tram, O-Bahn and bus) and high frequency bus routes by 2045.

Target 6: Greater housing choice
- Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045.
Devon Park Residential DPA
by the Minister
Analysis

The DPA seeks to deliver the targets of the Plan by opportunity for a diversity of infill housing, including affordable and medium density housing, within an established residential area in inner/middle metropolitan Adelaide.

The affected area is adjacent open space, in proximity to mass transit (the Adelaide-Gawler rail corridor) as well as areas of employment and mixed use/retail.

2.2 Planning Reform and the Planning and Design Code

A new planning system is currently being introduced into South Australia. The new Planning, Development and Infrastructure Act 2016 is being introduced in stages. The Planning and Design Code is the cornerstone of the new planning system, and will consolidate the planning rules contained in South Australia’s 72 Development Plans into one rulebook. In this regard the City of Port Adelaide Enfield Development Plan will be superseded by the new Planning and Design Code in the middle of 2020.

Existing zones in the current development plans will be transitioned to the equivalent zone in the Planning and Design Code. In regard to the policy changes proposed in this DPA, all changes seek to utilise existing zones with the current Port Adelaide Enfield Council Development Plan. These changes will be transitioned within the new zones and subzones that may be applied to the affected area.

Refer to the SA Planning Portal at www.saplanningportal.sa.gov.au for more information about the planning reforms or the Planning and Design Code.

2.3 State Planning Policies for South Australia (Jan 2019)

The Planning, Development and Infrastructure Act, 2016 establishes a new strategic and planning policy framework for South Australia’s Planning System. The State Planning Policies for South Australia (SPP) is the highest order statutory instrument for South Australia’s planning system and will guide both regional and metropolitan planning and development in the future. The SPP outlines matters of importance to the state in land use planning and development.

Within the PDI Act, the SPPs are given effect through the creation of planning instruments, including Regional Plans and the Planning and Design Code within the new planning system and their consideration is important in ensuring consistency with any transition of existing Development Plans to the new Planning and Design Code.

The SPP outlines 16 policies which sets out the overarching goals for the state and requirements for the planning system of which the following 4 are of specific relevance to this DPA:

**SPP 1 Integrated Planning:** Integrated planning coordinates the strategic use of land with the necessary services and infrastructure.

**SPP 2 Design Quality:** Good design improves the way our buildings, streets and places function, making them more sustainable, more accessible, safer and healthier.

**SPP 6 Housing Supply and Diversity:** Our planning system must enable the sufficient and timely supply of land and a variety of housing choices at appropriate locations.

**SPP 16 Emissions and Hazardous Activities:** Protecting communities and the environment from exposure to industrial emissions and hazards and site contamination is fundamental to the creation of healthy cities and regions.

The DPA is consistent with the key policy directions sought within the SPP. Supporting residential growth in this location further supports the investment within strategic public transport in this location, particularly the Adelaide – Gawler rail corridor which will be electrified. This supports the shift to more sustainable and active transport modes, aiding in the creation of walkable communities and further supporting renewal of key corridor along Churchill Road.
The desire for increased density for development within an established residential context requires emphasis on good design outcomes and the DPA seeks to ensure sufficient policy coverage addressing good design outcomes for the development of the affected area.

The DPA also addresses the conflict between residential and industrial land uses through supporting the relocation of the Entech Electronics facility to a more appropriate location, facilitating its potential future growth, as well as improving amenity for the surrounding residential neighborhood. In doing so, the DPA needs to also acknowledge and suitably address the management of site contamination and provide the necessary policy support to accommodate the intended residential land uses envisaged for this location.

**2.4 Housing and Employment Land Supply Program (HELSP) Report 2012 – Monitoring Report**

The HELSP report is a review of the supply, demand and consumption, and the regional constraints and opportunities of housing and employment lands (together with population trends) in the greater Adelaide area. It is guided by *The 30-Year Plan for Greater Adelaide* and supports the achievement of the targets of that Plan by ensuring the government can deliver a long-term supply of land to support housing and jobs growth; guide rezoning by councils and the government; support the transition to a new urban form through increased infill development; and aligning land supply with infrastructure planning and investment.

A recent report update - the Residential Land Supply and Demand Trends 2018 - notes that in recent years significant progress has been made on structure plans, investigations and subsequent Development Plan Amendments for key infill areas and transit corridors across the inner and middle regions of metropolitan Adelaide. This provides for significant future community growth in a manner that supports both function and amenity.

In the past decade, a large amount of infill development has occurred in Mawson Lakes, Northgate and other major infill broad hectare sites, however, this supply is rapidly diminishing and the challenge now is to progress the identified major infill areas and continually identify opportunities to create more capacity, such as that at Devon Park.

Between 2008 and 2014:
- 10589 dwellings were demolished at an annual average rate of 1765.
- 2656 sites were re-subdivided between 2008 and 2014 (annual average of 443 sites).
- The total net dwelling increase on demolition and re-subdivision sites over the study period (2008-14) was 11,913 (annual average of 1,986 dwellings).

It is estimated that minor infill supply will continue at a similar rate into the foreseeable future.

**2.5 Integrated Transport and Land Use Plan for South Australia (2015)**

The *Integrated Transport and Land Use Plan* (ITLUP) provides comprehensive actions and directions for land use, infrastructure and transport over the next 30 years. The focus is on connecting people to places and business to markets through three goals of:

- Healthy, safe, affordable, connected communities
- A strong, diverse and growing economy
- Thriving natural and built environments

The affected area is located within an area identified in ITLUP as ‘Inner Adelaide’. Key directions for Inner Adelaide are:

- A sharper focus on inner Adelaide to boost the central city as a creative, lively and energetic area where more people want to live and businesses want to locate.
- Refocusing our transport system to support and actively encourage mixed-use medium density, vibrant communities and business growth in inner and middle urban areas.
Accessibility to public transport and population densities, in essence, are interrelated and can influence the demand and usage of public transport and success in reducing car dependency, particularly for inner suburban areas.

Other key improvements to the transport network identified in ITLUP that are relevant to Inner Adelaide and the affected area are as follows:

- A redesigned and modernised bus network with improved frequency, coverage and directness of bus services that focus on major activity centres; improved and expanded feeder services to train services; development of ‘super stops’ at strategic activity centres; and increased park and ride car parking capacity.
- Improved cycling and walking connections to public transport stations and stop, to activity centres and other key destinations, to expand the catchment of these services and facilities.

### 2.6 Port Adelaide Enfield City Plan 2030

The City of Port Adelaide Enfield City Plan shapes strategic decision making for the organization towards 2030. It identifies the Council’s strategic planning priorities for its community, centred around the following vision:

- A City that values its diverse community and embraces change through innovation, resilience and community leadership.

Five key themes form part of the Plan with supportive objectives and indicators, of which the following are pertinent to the DPA:

- **Economy – A City of opportunity**
  - Growing – number of local jobs
- **Community – A City that supports community wellbeing**
  - Healthy – proportion who say they are healthy
  - Inclusive – proportion who feel part of their community
  - Cohesive – proportion who say they feel safe in their neighbourhood
- **Place Making – A City where people love to be**
  - Belonging – city net promoter score
  - Accessible – proportion who say they can easily access places and services from across the city

The DPA aligns with these objectives and performance indicators, especially as it aids in facilitating the creation of additional housing, and therefore communities, within a location that has excellent access to services, facilities and employment services. It also supports the creation of a walkable neighbourhood, aiding in active transport and health benefits associated with these neighbourhoods. The DPA also seeks to ensure good design outcomes so that the resultant residential population is integrated within the existing surrounding community and aids in identity and belonging.

### 2.7 Related Development Plan Amendments

Consideration has been given to the following Development Plan Amendments that are currently also being undertaken. This includes consideration of Council led DPAs and other DPAs being conducted by the Minister for Planning. The affected area borders the City of Charles Sturt, therefore consideration has been given to any policy changes proposed within this Council area.

- **City of Port Adelaide Enfield Development Plan Amendments**
  - **Cowan Street, Angle Park Residential DPA**

This DPA seeks to rezone a former reserve at Angle Park for medium density residential development. The DPA includes investigating issues around interface with adjacent non-residential land uses, along with infrastructure capacities. While the DPA is site specific, the policies to be
applied may potentially align and comprise those envisaged as part of this DPA. It will be important that any changes to policy as part of the DPA do not adversely affect those proposed to be sought within this DPA (and vice versa).

- **Corner Days and Regency Roads, Croydon Park DPA**

  Council is reviewing the land use policies applying to a large area of underutilised industrial zoned land at Days Road and Regency Road, Croydon Park. The DPA is privately funded, and the affected area is under the ownership of several different parties. The zoning review is intended to enable the future development of the land for residential, retail, and commercial uses.

  The DPA is specific to this location and unlikely to impact on the Devon Park Residential DPA.

- **City of Charles Sturt Development Plan Amendments**

  The City of Charles Sturt is currently in the process of preparing a number of site specific and generally privately funded DPAs across its Council area. These mostly relate to the provision of mixed use development outcomes in strategic locations and are unlikely to have a direct bearing on the policies being reviewed as part of the Devon Park Residential DPA. The closest of the DPAs to the affected is summarised below.

  - **Kilkenny (Mixed Use) DPA**

    This DPA affects a specific area of land adjacent to the Kilkenny train station and seeks to rezone employment zoned land to a form of mixed use zone which supported a broader range of non-residential land uses, as well as high density residential development. The objectives of this DPA align with the Devon Park Residential DPA and therefore would contain a consistent policy approach. Nevertheless, the specific nature of this DPA is unlikely to affect the policy response to the Devon Park Residential DPA.

    It is noted that the adjacent land to the affected area south of Alexander Avenue underwent a similar rezoning process in 2013, where the land fronting Alexander Avenue between Bolingbroke Avenue and Exeter Terrace was rezoned from industry to residential which supports medium density development. It is noted that a concept plan is applicable to this site.

- **City of Prospect Development Plan Amendments**

  The City of Prospect is not currently undertaking any Development Plan Amendments that are relevant to this DPA.

- **Development Plan Amendments by the Minister for Planning**

  The proposed DPA would ensure that consistency is achieved, and avoid repetition, ambiguity and conflict in regard to the policies contained in the following related Ministerial DPAs:

  - **Adelaide-Gawler Rail Corridor Uplift DPA**

    It is noted that the affected area for this DPA falls within the original investigations area for the Adelaide-Gawler Rail Corridor Uplift DPA. The Devon Park Residential DPA has been proposed as a separate process to enable it to be managed in an efficient, stand-alone manner, and to enable the Adelaide-Gawler DPA to focus on areas in the north of Adelaide instead. It is likely, given the specific and confined nature of the affected area, the policy response for the Devon Park DPA will differ slightly to that of the Uplift DPA which covers broader areas within different contexts in the Playford and Gawler Councils.

2.8 **The State’s Planning Policy Library**

The South Australian Planning Policy Library (SAPPL) provides the current ‘benchmark’ for amending land use policy and zoning in South Australia and has been used as a basis to frame proposed amendments contained in this DPA. The SAPPL is made up of a General Section, Overlays, Zones, Policy Areas and Precincts.
The Port Adelaide Enfield Council Development Plan is based on the format and content of the SAPPL. On this basis, changes to this Development Plan are generally focussed on amendments at the Overlay and Zone levels, as the General Section provisions are already consistent with the SAPPL.

The following policies have been selected from the SAPPL for consideration and/or use in this DPA and are discussed in more detail under section 4.9.2 - What Policy Currently Applies and section 5 Summary of Recommended Policy Changes:

- Affordable Housing Overlay
- Noise and Air Emissions Overlay
- Residential Zone
- Medium Policy Area
- Interface between Land Uses
- Hazards
- Residential development

2.9 Planning and Design Code

The Planning and Design Code will be a central feature of South Australia's new planning system, becoming the state’s single planning rulebook for assessing all development applications and replacing the 72 Development Plans and SAPPL. It will provide a consistent and contemporary planning policy framework across the state.

The SAPPL will be used as a base for the amendments, however, how policy for the affected area will sit within the future Planning and Design Code framework will also be considered. Use of Core SAPPL policy as much as possible will ensure appropriate transition of policy introduced as part of this DPA in this location into the new Code.

3 INVESTIGATIONS PREVIOUSLY UNDERTAKEN

3.1 Statement of Justification, Privately Funded DPA, Ekistics, May 2018

A ‘Statement of Justification’ (the Statement) was provided by Ekistics, the proponent’s representative, to the City of Port Adelaide Enfield to seek support for the rezoning of the land to enable future development of the land for medium density residential dwellings as externally funded Development Plan Amendment (DPA). The City of Port Adelaide Enfield, at the time, while providing in principle support for the DPA’s intent, did not have the resources to commit to undertaking the DPA.

Two key justifications for the proposed rezoning were provided as follows:

- Limitations of the site for light industry - the established policy framework applying to the site and environs places significant limitations on the ability to achieve a compatible but also viable future industrial development on the Entech site given the limited land size, established policy conditions, and challenging residential interface, and thus there is a need to reconsider the existing policy applying to the land.

- The suitability of the site for residential development - the land is unconstrained and under single ownership making its redevelopment easier to achieve and manage. The site sits within a residential context which is undergoing change and will likely to increase over time, reflective of its walking distance to public transport (bus and train), and large areas of public open space. The land is also serviceable with infrastructure that has capacity or can be economically provided.
3.2 Site Contamination Audit Interim Audit Advice Form, Adrian Hall, July 2018

An interim Site Contamination Audit Advice form has been provided by Adrian Hall, an Accredited Auditor. The Advice indicates that previous reports and investigations undertaken on Site Contamination in the affected area have been prepared and assessed in accordance with the guidance in the National Environment Protection (assessment of site contamination) Measure 1999 and the EPA publication, Guidelines for the assessment and remediation of site contamination.

The findings from the numerous site assessments undertaken across the affected area over many years, and considered as part of the Auditor’s Interim Audit Advice, indicate that:

- the site is subject to localised areas of soil contamination as a result of the historic uses across the site (including leakage of underground storage tanks), including higher than
- any soils removed from the site would be classified as Intermediate and Low-Level Contaminated Waste
- there is evidence of soil vapour contamination across the site however these are anticipated to pose low risk to occupants of the site and east of the site (particularly with appropriate remediation of the soil)
- there are elevated levels of TCE and benzo(a)pyrene within the groundwater, with background levels of sulfate, chloride and sodium concentrations exceeding acceptable residential and open space use levels

Importantly, the results indicate that with remediation, the affected area can be made suitable for residential development. The remediation of the site, and the requirements of this are matters that can be suitably addressed as part of future development applications for the land.

The Environment Protection Authority (EPA) have reviewed and provided advice on the Interim Audit Advice. They are comfortable with the recommendations made within the Audit Advice and consider the Interim Advice to be sufficient in respect of the investigations addressing the site’s suitability for residential development.

Implications for this DPA

The affected area comprises a contaminating activity and has known and well documented contamination locations and levels. The Hazards module within the existing Development Plan already contains policy which ensures that the assessment and remediation of soil contamination is addressed as part of any future development application. Notwithstanding this, it is important that the policy acknowledges the site’s history and need for remediation within the policy framework and this can be most appropriately addressed through the Desired Character Statement within the adopted zone / policy area. Suggested wording is as follows:

“Development of land with a known history of a potentially contaminating activity such as from former industrial uses, will occur once the site has been assessed and remediated to the standard necessary to ensure it is safe and suitable for the proposed uses, including sensitive uses such as residential development.”

3.3 Remediation Management Plan, Senversa, June 2018

A Remediation Management Plan (RMP) for the Affected Area has been prepared by Senversa on behalf of the land owner. The RMP defines the nature and extent of contamination on and under the site (having regard to the extensive testing and analysis history for the site) and outlines the remediation options, including roles and responsibilities for completing the remediation tasks and steps in mitigating potential risks to human health and the environment during the remediation process.

On the basis of a remediation options assessment, the RMP recommends one of or a combination of the following options:

- Option 1 - excavation, on-site treatment and re-use of soils contaminated with volatile organic compounds.
Option 5 - consolidation and isolation of metal impacted soils under sealed areas of the developed site.

However, it is noted that the application of the options should be considered based on, but not limited to, the following factors:

- Final development layout
- The proposed title arrangements – noting that SMPs require Strata or Community Title arrangements to support their implementation
- Feasibility of retaining contamination on-site in the context of the proposed development layout and required property title arrangements.

The RMP also details the appropriate staged remediation process, and makes recommendations for the preparation of a Construction and Environment Management Plan (CEMP), a site-specific Health Environment Safety Plan (HESP) and also a contingency plan for any unexpected situations that could occur.

Implications for this DPA

The RMP identifies that there is site contamination impacting the affected area and that remediation works will need to occur prior to the use of the site for sensitive residential purposes. These matters will be addressed as part of any future land division or dwelling applications across the affected area and therefore have no direct bearing on the policy requirements for this DPA.

3.4 Utility Infrastructure Analysis, BCA Engineers, October 2018

A high-level assessment of the infrastructure capacity in this location has been undertaken in order to determine what, if any, additional infrastructure provision and upgrades will be required as a result of the development of the site. The assessments were informed by the development of the site with a yield consistent with medium density development. Key findings are summarised below

Power Network

The area affected is serviced by SA Power Networks low voltage supply infrastructure from a pad-mounted transformer located on Belford Avenue. The transformer also supplies the street. The site currently has a 275kVA rated supply. This will be adequate to service future residential properties. Each new allotment will require individual domestic electrical connections.

NBN

The existing site is serviced by NBN via Belford Avenue and Alexander Road. There is evidence of Telstra services but these are indicated as disconnected. NBN will be able to be extend their network to service future development.

Sewer Network

The existing site is currently serviced by the SA Water network by 2 existing 100mm government inspection points (GIP) serving as sewer connections to site (1 from Belford Avenue and 1 from Alexander Avenue). The existing sewer infrastructure has suitable depth for connection along any face via gravity drainage.

The site requires expansion of its existing sewer infrastructure to suit the needs associated with the development of the land for residential purposes. All (but two) Torrens title lots proposed will require an individual 100mm sewer connection.

Potable Water

The existing domestic water infrastructure at the site is not suitable for reuse under a residential scheme. All new titles will require an individual 25mm water meter and connection to the street.
An application to SA Water for the developments domestic water requirements will be necessary to confirm Authority main capacity and quantify any unforeseen costs associated with Authority infrastructure upgrades.

Natural Gas

Existing medium pressure gas mains are present in Alexander Avenue and Belford Avenue, bordering the development on the north and south boundaries. There is limited access to gas from neighbouring Bolingbroke Avenue.

Natural gas is available at only medium pressure, reducing its efficacy as a source of fuel for anything other than domestic cooking applications. Dependant on the requirement of gas to site for domestic cooking, hot water or otherwise, a gas connection and meter can be provided to most titles. Bolingbroke Avenue fronted properties have limited access to gas infrastructure, and hence will may require a developer contribution to facilitate its’ use within this road. APA may be required to extend their network to service Bolingbroke Avenue fronted houses if required.

Non-potable Water (Recycled)

No recycled water infrastructure has been identified near the site nor required for the site.

### Implications for this DPA

There are no discernible implications for policy. The provision of any infrastructure upgrades and connections will be required as a condition for future division of the land and the existing Infrastructure and Land Division module policies within the Port Adelaide Enfield Development Plan provide the necessary support for this to be suitably addressed at a development application stage.

There is no need for a Deed with the proponent before the rezoning of the land to facilitate the upgrade of any required infrastructure to service the development. The fact that the land is under single ownership and most likely will be developed by a single entity implies a masterplanned approach and the management of infrastructure connections and upgrades as part of any future application process.

### 3.5 Stormwater and Flooding Infrastructure Assessment, MLEI Consulting Engineers, December 2018

An assessment of the flood potential and Stormwater infrastructure capacity of the surrounding network has been undertaken, having regard to the proximity of the site to the interface with the adjacent Charles Sturt Council’s infrastructure. Key findings are summarised below:

- The existing adjacent stormwater infrastructure is at capacity and the area is currently subject to flooding during extreme events (although these are largely limited to the edges of the site at the street interface and limited to depth of 20mm as shown in Figure 2 below).
- Outflow from the development will likely need to be restricted from the 100-year post development flow rate to the 5-year pre-development. Given medium density development is anticipated, the development proposal will need to consider provision of space to house stormwater detention which will need to include (overall for the site):
  - a storage volume of approximately 83m$^3$ for the 100yr ARI event. In addition,
  - a storage volume of 12m$^3$ for the 5yr ARI event
- To facilitate a gravity stormwater (and sewer) servicing of the proposed development, the site may need some minor controlled filling following demolition of existing facilitates (which should also address the minimum finished floor levels to avoid potential flooding from major storm events).

While the assessment considers that Water Sensitive Urban Design measures are likely to be unachievable given the site’s intended development intensity, this is not supported by limited infrastructure capacity requirements and should continue to be pursued as part of the design outcomes for the development of the affected area, particularly as it can be developed in a masterplanned manner.
Implications for this DPA

Notwithstanding the stormwater network capacity issues in this location, the ability to accommodate stormwater runoff from the site can be suitably resolved as part of the design of any future development and does not trigger the need for a specific Deed with Council for the upgrade of trunk infrastructure, side entry pits or kerbing. There is adequate policy coverage within the Hazard and Natural Resources modules of the Development Plan to address these design issues of flooding and stormwater management (including use of water sensitive urban design).

Figure 2: Extent of floodwater inundation to the affected area.

3.6 Traffic Investigations, Cirqa, April 2019

An assessment of the parking and traffic implications of the development of the affected area to the intended medium density capacity has been undertaken in order to understand what, if any, upgrades need to be undertaken to the road network. This has included a SIDRA model analysis and has taken into account the nearby rail line crossing, the impacts of the Regency to Pym Street South Road Project and the development of the currently vacant warehouse site to the south of the affected area for up to 40 townhouses (assuming a density of 50 dwellings per hectare). The assessment has also considered the ability to service development through on-street parking and any implications this may have on design that should be reflected in policy. Key findings are summarised below:
Traffic
• All surrounding roads are of a local road function
• Future development of the site will generate in the order of 320 trips per day, with up to 32 trips in the AM / PM peak periods
• Retention of the existing industrial land use is anticipated to generate up to 250 trips per day with up to 50 trips in the AM / PM peak hour
• The increase of 70 additional trips per day and 15 trips in the peak hour as a result of the rezoning of the affected area will not impact upon the functional hierarchy of the adjacent local road network
• The proposed rezoning is not considered to result in undue amenity impacts to surrounding properties as a result of a minor increase in traffic movements
• SIDRA analyses of the Belford Avenue and Bolingbroke Avenue intersection indicate that the proposed rezoning will have minimal impact upon queues, delays and the junction level of service.
• SIDRA analyses of the Churchill Road and Bolingbroke Avenue intersection indicate that the proposed rezoning will have minimal impact upon queues, delays and the junction level of service.
• The rezoning will result in decrease number of through-bound volumes along Bedford Avenue through the rail crossing and will also not impact on the queue lengths or contribute to risks of queue conflicts with the rail crossing.

On-Street Parking
• The development of the site for 40 medium density dwellings would require the provision of on-street parking for 20 vehicles based on the existing Development Plan policy (in addition to off-street parking requirements within the site itself)
  The affected area currently has approximately 230 metres of usable street frontage to the existing road network. Such a frontage will facilitate adequate parking for the proposal as well as associated access provisions.
• It is likely that a portion of the site’s on-street parking requirement will be able to be additionally accommodated internally within the development within any new roadway proposed.

Implications for this DPA
The policy coverage of design issues associated with the location and design of access, parking and movement networks is contained within the Transportation and Access module within the General Section of the Development Plan. The policies within this section include coverage of the following issues of relevance to the Affected Area’s future development:
• safety in the location of access points in accordance with Australian Standards
• the design of off-street car parking in accordance with Australian Standards
• the provision of adequate parking (referencing the ratios identified within Tables ChSt/2 which accommodates parking for medium density forms of residential development)
• minimising pedestrian and vehicle conflicts

On the basis of the above, the rezoning of the Affected Area to accommodate residential development is considered appropriate from a traffic management perspective and will not require additional policy coverage on this issue.
4 WHAT ELSE DID WE CONSIDER / INVESTIGATE?

4.1 Industrial Land Supply

A comprehensive Industrial Land Demand and Supply assessment was undertaken as part of the Employment Lands (Gillman/ Dry Creek and Wingfield) and General Section Amendments Development Plan Amendment. This assessment remains applicable to the assessment of industrial land demand and supply within the City of Port Adelaide Enfield and north-western Adelaide generally.

Economic growth and market trends tend to drive growth within industrial development and therefore demand for industrial land. However, recently, there have been other drivers which have influenced how and where industries are locating. These key drivers of demand for industrial land include:

- Structural change and rise of the logistics sector (mainly through the rise of online retailing)
- A shift from manufacturing to warehousing and logistics
- Infrastructure improvements enticing companies to a particular area with convenient access resulting in time savings and logistics benefits
- Clustering of similar businesses to create business networks and collaboration, driving synergies and economies of scale – examples include Innovation Precincts, defence etc.
- Availability of serviced and affordable land provides incentive for companies to move premises (particularly those with poorly located or out-dated facilities) often as they are better suited, cheaper and can accommodate operational and growth flexibility into the future
- Competing uses in the inner / middle suburban areas, including commercial and residential uses provide restrictions to growth, expansion and investment

The key drivers for demand and emerging trends have seen quite dramatic changes in the industrial sector in recent years, categorised by:

- a continued shift to outer metropolitan areas, where large, low cost industrial land is available
- the reduction of industry zoned land in the inner suburban markets
- a greater emphasis on efficiency in ‘the freight task’, with accessibility to quality infrastructure (road, rail, sea).

Western Adelaide currently has approximately 3,353 ha of existing land zoned or earmarked for industrial purposes (DPTI, 2018).

In terms of metropolitan wide demand:

- Gillman / Dry Creek has been rezoned to accommodate a range of industrial land uses;
- Greater Edinburgh Parks, has significant existing and future available industrial land and will benefit from improved infrastructure such as the Northern Expressway, Port River Expressway and the proposed Northern Connector;
- Lefevre Peninsula, has significant existing industrial land available as well as future growth opportunities;
- Infill opportunities exist within the Inner North, although these opportunities are expected to diminish over the next 5-10 years; and
- Tonsley and Lonsdale can be expected to absorb some of the metropolitan demand for industrial land.

Based on the above, the loss of industrial land by the rezoning of the affected area for residential development is not likely to impact negatively on the overall offer and supply of industrial zoned land to service Adelaide into the future.
Implications for this DPA

The affected area should be rezoned to accommodate medium density residential development (i.e., a Residential Zone) with minimal impact on industrial land supply.

4.2 Appropriate Built Form

4.2.1 Density

The principal objective of the DPA is to facilitate medium density residential development to take advantage of the affected area’s location and proximity to public transport, services, and open space. Medium density development has a range of interpretations within the Port Adelaide Enfield Council Development Plan. The adjacent policy context (Residential East Policy Area 64) provides for medium density development in certain locations, although the density provisions provide for minimum allotment sizes of 300 square metres (33 dwellings per hectare net) and do not align to policies within the Development Plan such as:

- Comprehensive Development Policy Area 55 (which covers areas of Northgate, Oakden, Kilburn and Blair Athol) - 33 to 40 dwellings per hectare net
- Medium Density Policy Area 73 (which covers The Parks) – 35 – 70 dwellings per hectare net

The recently rezoned land to the south of the affected area within the Charles Sturt Council Development Plan provides for densities in the order of 35 – 70 dwellings per hectare net.

Implications for this DPA

Given the desire to maintain consistency with adjacent development to the south which supports medium density development, and that this policy framework is likely to transition easily into the Planning and Design Code, a net residential density in the order of 35 – 70 dwellings per hectare (equates to 142 – 285 square metres site areas) is considered the most appropriate density range and also reflects the more contemporary policy provisions.

4.2.2 Building Heights

The established building heights within the surrounding residential areas to the affected area are predominantly single storey in form, although more recent development that better represents the density of development envisaged within the affected area is typically within a 2 or 3 storey built form.

The policies of the surrounding residential areas allow for up to two storey forms and therefore it is appropriate that this is also accommodated within the affected area as a minimum. It is considered that additional building height up, to 3 storeys, is appropriate within the affected area as it interfaces with taller built forms to the south and can be suitably accommodated and designed as part of the contained masterplanned site.

Any proposed development will interface with existing single storey residential development to the east and an appropriate transition is important in these locations to avoid overbearing building, shadowing and overlooking.

Implications for this DPA

The policy framework should facilitate up to three storey building forms, as well as identify a desire to transition to lower building forms for adjacent residential areas.
4.2.3 Setbacks

Given that there is a desire for medium density development, these forms of development are typically afforded reduced front, side and rear setbacks, reflective of the desire to maximise the use of smaller land parcels. This approach is consistent with those applicable in other policy areas within the Development Plan, as outlined below:

<table>
<thead>
<tr>
<th>Zone / Policy Area</th>
<th>Primary frontage</th>
<th>Secondary frontage</th>
<th>Side</th>
<th>Rear</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential Zone</td>
<td>5m (non-arterial)</td>
<td>1.5m (1 storey) 2m (2 storey) 2m + height above 6m (3+ storeys)</td>
<td>Boundary up to 9m length and 3m height 1m – 1 storey 2m – 2 storey 2m+ height above 6m – 3+ storeys</td>
<td>0m (if laneway) 3m single storey 8m - 2+ storeys</td>
</tr>
<tr>
<td>Comprehensive Development Policy Area 55 (Lightsview)</td>
<td>Boundary (no limit identified) 1m – 1 storey 1.5m – 2 storey 2m+ height above 6m – 3+ storeys</td>
<td>5.5m - 2+ storeys</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Medium Density Policy Area 73 (The Parks)</td>
<td>3m</td>
<td>1.5m (all cases) Boundary (no limit identified)</td>
<td>&lt; 300m² 0m (if laneway) 1m single storey 2m – 2 storeys 2m+ height above 6m -3+ storeys &gt;300m² 0m (if laneway) 3m single storey 3m – 2 storeys 3m + height above 6m -3+ storeys</td>
<td></td>
</tr>
</tbody>
</table>

It should be noted that the core policy allowing for reduced setbacks also requires consideration of an adequate direct winter sunlight to the proposed and adjacent dwellings in accordance with the General Section policies, providing additional protection and guidance in ensuring suitable building amenity outcomes as a result of reduced setbacks.

While the affected area does have a direct interface within an existing streetscape (Belford Avenue and Alexander Avenue), it is likely that the policy context for the areas to the east will similarly shift to cater for increased densities in the future. Therefore a reduced setback within the streetscape will, over time, become aligned and allow for the suitable framing of the streetscape space.

Implications for this DPA

The policy will provide for reduced setbacks than for those for the Residential Zone. The ability to create a newly formed character in this location would facilitate the application of the setbacks found within the Medium Density Policy Area 73, given this represents a contemporary policy approach to medium density development within the Port Adelaide Enfield Development Plan.

4.3 Heritage

Places of heritage value are protected within the Heritage Places Act, 1993 (State Heritage places), Development Act, 1993 (Local Heritage places) or the Aboriginal Heritage Act 1988. The following is a review of heritage within and adjacent to the DPA investigation area.
Indigenous

The Port Adelaide Enfield Council Development Plan does not contain information about the location of objects and sites of Aboriginal heritage significance within the location of the affected area. Information about such sites and objects is maintained in a register (a Central Archive which includes the Register of Aboriginal Sites and Objects) managed by the Aboriginal Affairs and Reconciliation Division within the Department of State Development.

A search of this database has indicated that there are no known objects or sites of Aboriginal heritage significance within the area affected by this DPA. Given the fully developed nature of the affected area, it is unlikely that any objects exist, however, the requirements of the Aboriginal Heritage Act, 1988 indicate an obligation to report any objects found during development. This does not require specific policy guidance as part of this DPA as it is covered by obligations within the Aboriginal Heritage Act, 1988 (with notations typically attached to approvals advising of these obligations).

Non-Indigenous

Places of State and local heritage value are listed in tables found in the Development Plan. A review of the Development Plan indicates that there are no heritage places located inside the affected area. The nearest local heritage place is located within Berwick Avenue, some 80 metres south of the site and with no direct relationship to the affected area, and therefore unlikely to have its setting affected by any future development in this location.

Given the proximity of the Charles Sturt Council and Prospect Council boundaries, a review of the Charles Sturt Council Development Plan and Prospect Council Development Plan has also been undertaken and confirmed that there are no heritage places within proximity of the DPA investigation area.

<table>
<thead>
<tr>
<th>Implications for policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>As no heritage places are affected by the rezoning of the subject land and any future development, there are no policy implications for this DPA.</td>
</tr>
</tbody>
</table>

4.4 Social Infrastructure

Health and Education

The affected area is located within the Woodville High School Zone. Additionally, there are 18 education and early learning facilities within proximity of the affected area. These include:

- seven kindergartens/child care centres
- three public primary schools
- two private primary schools
- two private primary and secondary (R-12) schools
- one public secondary school
- the Regency TAFE campus.

There are a number of health related and care services located in proximity to the site including:

- six general practitioner practices
- one chiropractic practice
- three psychologist clinics
Given that the affected area is likely to achieve a yield which would cater for in the order of only 100 additional people, there is likely to be capacity within the range of education, early learning health and medical facilities within the surrounding area.

Recreation / Open Space

The likely form of residential development will have reduced areas of private open space and therefore the suitable provision of accessible public open space within the surrounding area will be important to service future residents and ensure walkability. An assessment of surrounding facilities has identified that there are approximately nine ovals, reserves and recreation grounds within a one kilometre radius of the Affected Area. These facilities provide for both active and passive recreation as well as organised and informal active pursuits likely to be sought by occupants of dwellings in the affected area.

Two of these facilities, Sam Johnson Sportsground (5.7 hectares) and the Charles Cane Reserve (1.4 hectares), are within 200 metres walking distance of the affected area and demonstrate that provision of public open space within the affected area with development may not be required.

Implications for this DPA

The existing social infrastructure in the surrounding area is considered adequate to provide for any additional population growth as a result of the development in the affected area. The Residential Zone caters for the provision of small-scale non-residential land uses which service the local population and, while not anticipated to occur on this location, could be accommodated should the need / demand arise. No specific policy response is required to address this issue.

4.5 Pedestrian and Cycle Links

Pedestrian facilities within the area include footpaths along both alignments of all surrounding roads. A pedestrian crossing facility is provided at the Gawler Rail line to the east of the site, and provides good accessibility for pedestrians and cyclists to Churchill Road from the affected area. Pedestrian connection is provided to the Sam Johnson Sportsground, which includes a Dog Park and is the other key pedestrian node / attraction for this location.

Belford Avenue is identified as a secondary link on the City North Ring Route Bike Direct Network although no line marked cycling lane is provided.

These existing facilities provide a pedestrian-friendly environment through the provision of pedestrian and cycle links that are safe and attractive throughout the area. Given the scale of the affected area, internal links and connections are not considered necessary.

Implications for this DPA

There are a number of policies within the Transportation and Access Module in the General section of the Port Adelaide Enfield Development Plan which support the provision if suitable walking and bicycle paths and connections, including the minimisation of conflicts between vehicles and pedestrians. Additional policy coverage on this matter as a part of this DPA is not considered necessary.

4.6 Off-Street Car Parking

The area affected is located adjacent to Adelaide to Gawler rail line and also to a number of bus services along Churchill Road. The intent in supporting medium density residential development at this location is to maximise opportunities for population adjacent to strategic rail infrastructure and the investment in its upgrade. This implies a desire for transitioning to more sustainable transport modes, which also supports better health and wellbeing. It is therefore appropriate that the proposed policy seeks reduced vehicle parking provision.
The Port Adelaide Enfield Council Development Plan includes off-street vehicle car parking requirements for specific forms of development and these policies apply generally across the Council area. There are also separate requirements for those within Designated Areas, which are typically activity centres and identified growth corridors, such as along Churchill Road. These offer significantly reduced parking ratios for development and, given the nature of the residential development envisaged within the affected area and its context, are not considered appropriate for this location.

Additional guidance is also provided within Medium Density Policy Area 73 which offers a slight reduction to off-street parking for specific forms of residential development that would support a transition to public transport usage, yet provide sufficient off-street parking likely to be required for the forms of residential development envisaged (ie accommodating single car households). This is as follows:

- Single bedroom dwelling: 1 parking space
- Two bedroom dwelling where on-street parking is available within 50 metres: 1 space
- Affordable Housing: 1 space
- All other cases: 2 spaces

This approach aligns with Core policy structure of the SAPPL and provides for slightly reduced parking within certain circumstances, but then also maintains the current 2 spaces per dwelling for larger dwellings and where on street parking is not available.

**Implications for this DPA**

Adopt the car parking ratios for the affected area found within the Medium Density Policy Area 73.

### 4.7 Affordable Housing

Given that this DPA proposes policy to provide for medium density housing, it is considered reasonable to also encourage affordable housing.

The Affordable Housing Overlay and policies already exist in the Development Plan. These policies provide guidance for the provision of affordable housing for developments comprising more than 20 dwellings which is likely to be the case for the development of the affected area. The DPA therefore proposes applying the Affordable Housing policies to the affected area.

**Implications for this DPA**

It is recommended that the Affordable Housing Overlay and policies be applied to the affected area.

### 4.8 Interface with Noise Sources (Existing industry and rail)

The Noise and Air Emissions Overlay identifies and provides policies for mixed use developments and medium to high-density housing around major transit corridors (road and rail). In particular, it seeks to protect sensitive land uses (eg housing), from noise and air emissions generated by major transit corridors and land use by applying policies that address design, open space and building etc.

The application of the policy in relation to the Adelaide – Gawler Rail line would typically only be required for residential development within 50 metres of the rail corridor. The subject land is located over 157 metres from the corridor, and separated by additional residential buildings which would further buffer noise.

The warehouse to the south of the affected area is vacant, although has existing use rights for the warehouse use. The land has been rezoned for residential development and therefore the establishment of another industrial or commercial use that will create noise and air quality impacts on surrounding residential
development is not supported by the policy framework. It is highly likely that this site will also soon be redeveloped for residential development similar to those to its east.

### Implications for this DPA

As the distance to the rail corridor is approximately 157 metres, and likelihood of industrial activities occurring on the site to the south are small, the application of the Noise and Air Emissions Overlay is considered to be onerous and not necessary for the affected area.

### 4.9 Potential Zone & Policy Area Assessment

An assessment has been undertaken of the possible zone and policy area scenarios which may be suitable for the affected area to support the most appropriate development outcome. Ideally, a new zone and/or policy area will be avoided in favour existing policy within the Development Plan given the development of the new Planning and Development Code.

The future zoning for the Affected Area will need to support medium density residential development forms. As commercial development is not envisaged as part of the future development scenario for the land, this limits the potential zoning options. The potential zone options provided within the South Australia Planning Policy Library (SAPPL) which may accommodate the envisaged development scenario, include:

- Residential Zone
- Residential Neighbourhood Zone
- Suburban Neighbourhood Zone

The Residential Neighbourhood Zone is not currently applied within the current version of the Development Plan and its introduction for this small area of Devon Park is not considered appropriate, nor necessary.

The Suburban Neighbourhood Zone and Residential Zone currently operate within the Development Plan. As the future policy scenario is not anticipated to accommodate mixed use or non-residential development the application of the Suburban Neighbourhood Zone is not considered appropriate. As such it is considered that the application of the Residential Zone with a suitable Policy Area is the most appropriate policy outcome for this site.

The Development Plan currently contains a number of Policy Areas under the Residential Zone, the majority are location-specific policy areas, which provide a highly specified policy framework suitable for that particular location and not easily applied elsewhere. However, there are two policy area suite options operating under the Residential Zone module that are considered to be reasonably applicable to the affected area, these are:

- Medium Density Policy Area 73
- Residential East Policy Area 64

It is noted that the adjacent area to the south, under the Charles Sturt Development Plan, is located within the Residential Zone, Integrated Medium Density Policy Area 20. Consideration has been given to whether this policy area could be suitably applied to the affected area.

Given the proximity and similar development circumstances between the site and the adjacent area it is clear there is a strong connection and relationship. However, applying this policy area would be a significant change to the Port Adelaide Enfield Development Plan and would require heavy alteration of the policy (eg Council Wide and Residential Zone levels) to appropriately apply in this circumstance. Additionally, it is noted that the Integrated Medium Density Policy Area is not a standard Policy Area suite within the SAPPL. As such, this investigation has focused on the suitable policy area suites currently operating under the Development Plan, as identified above.
Residential East Policy Area 64

This policy area is currently applied to the land surrounding the affected area within the Port Adelaide Enfield Council area. Generally, the policy area is intended to accommodate a range of dwelling types but with a predominance of single-storey detached dwellings.

The intended development scenario for the affected area is to see a transition to a medium density form of residential development. Whilst this policy area is generally focused on low density residential development, medium density development is envisaged for land located within 500 metres of centres, shops, public transport routes, or areas of open space.

As discussed above, the affected area is within 500 metres of two substantial open space areas, and three public transport routes, these being bus routes on Harrison Road and Churchill Road, and the Gawler Railway Line (Dudley Park Station). As such, the affected area would conclusively achieve the requirements for medium density development under this policy scenario.

The Desired Character statement acknowledges the dominance of detached dwellings on larger allotments within the area, and indicates that opportunities for re-development will be limited to small pockets of underutilised land. Additionally, it is specified that infill housing must recognise and respond to the character of the area in which it is located in regard to its scale and siting.

The primary issue with the application of this policy area suite is due to PDC 4 which sets a minimum site area per dwelling of 300 square metres. Applying this requirement to the 8000 square metre site means the future development scenario could not achieve a medium density of the 35 – 70 net dwellings per hectare, the preferred density rate for medium density development contained within contemporary policy within the SAPPL. It is therefore considered that this policy area should not be applied to the affected area.

Medium Density Policy Area 73

This option provides policy framework which would facilitate the redevelopment of the affected area for medium density residential development.

The Medium Density Policy Area 73 provides for a range of medium density residential dwelling types, with a minimum of 15 per cent affordable housing, and designed to integrate with open space, neighbouring centres, and public transport.

Currently, Policy Area 73 only applies in one location within the Port Adelaide Enfield Development Plan, being approximately 4 kilometres north-west of the affected area in Angle Park. It is noted that the area is yet to be developed.

The Desired Character Statement currently provides locational specific guidance on development within the Policy Area. Whilst the language of the Desired Character Statement is somewhat location specific the policy intent can be appropriately applied to a different location, with some adaption should this policy scenario be adopted.

It is noted that transition in dwelling density, height, and form from the area to adjacent lower density residential development is a key consideration within the Desired Character Statement for the Policy Area. This is a comparative issue for the Affected Area.

It is noted that the Policy Area currently envisages dwellings of “one to three storeys in height with buildings up to four storeys in height envisaged in areas adjacent to or within close proximity to open space or the Neighbourhood Centre Zone”.

Whilst there is no Neighbourhood Centre Zone in proximity to the affected area, it is noted that the site is located within proximity of open space and as such a reasonable argument could be applied for four storey development at this location under this policy scenario. However, it is considered that four storey development would not be suitable at this location due to the degree of incongruity with established residential areas adjacent. Should this policy area be applied site specific policy may be necessary within the Desired Character statement and PDC 6, to differentiate appropriate building heights for the affected area and the Angle Park area, and / or provide for appropriate transition between height levels.
This area is also identified and provided additional policy guidance through the inclusion of Concept Plan Map PAdE/23. It is not considered that in this circumstance a concept plan would be necessary to guide development of the affected area, given its limited size and the fact that concept plans will not form part of the pending Planning and Design Code.

**Implications for this DPA**

It is considered that the application of the Residential Zone, Medium Density Policy Area 73 is the most appropriate policy option for the affected area.

It will be necessary to make amendments to Desired Character Statement, to ensure that the locational specific language can appropriately apply to both the existing policy area and the affected area.

5 SUMMARY OF RECOMMENDED POLICY CHANGES

5.1.1 Zoning

- **Residential Zone**
  - Replace the existing Industry Zone covering the affected area with the Residential Zone.

5.1.2 Policy Areas

- **Medium Density Policy Area 73**
  - Introduce the Medium Density Policy Area 73 to the affected area to support the desired medium density development envisaged in this location
  - Amend the Desired Character Statement to identify and differentiate the applicable design elements of the statement to Angle Park (where is currently applies) and Devon Park (where it is proposed).

5.1.3 Maps and overlays

- **Overlays**
  - Introduce the following Overlay Maps and associated policies:
    - **Affordable Housing** – to provide for affordable housing in the DPA affected area

- **Mapping**
  - Replace the following maps to reflect amended / new policy:
    - Council Index Map
    - PAdE/36:
      - Zone Map
      - Policy Area Map
  - Insert the following map to reflect amended / new policy:
    - PAdE/36:
      - Affordable Housing
6 STATEMENT OF STATUTORY COMPLIANCE

6.1 Section 26 of the Development Act 1993

Section 26 of the Development Act 1993 prescribes that the DPA must assess the extent to which the proposed amendment:

(a) accords with the Planning Strategy
(b) accords with other parts of the Development Plan
(c) complements the policies in the Development Plans for adjoining areas
(d) satisfies the requirements prescribed by the Regulations.

6.2 Accords with the Planning Strategy

Relevant strategies from the Planning Strategy are summarised in Section 2 and Appendix 1 of this document. It is the intent of the DPA to support the achievement of the Planning Strategy policies.

6.3 Accords with other parts of the Development Plan

The policies proposed in this DPA are consistent with the format, content and structure of the Port Adelaide Enfield Council Development Plan.

6.4 Complements the policies in the Development Plans for adjoining areas

The policies proposed in this DPA will not affect the Development Plans for adjoining areas.

6.5 Satisfies the requirements prescribed by the Regulations

The requirements for public consultation (Regulation 11) and the public meeting (Regulation 12) associated with this DPA will be met.
7 REFERENCES/BIBLIOGRAPHY

- CITY PLAN 2030, City of Port Adelaide Enfield 2013
- INFRASTRUCTURE ANALYSIS, BCA Engineers, 2018
- INFRASTRUCTURE ANALYSIS, MLEI Consulting Engineers, 2018
- INTEGRATED TRANSPORT AND LAND USE PLAN, Government of South Australia, 2015
- PORT ADELAIDE ENFIELD COUNCIL DEVELOPMENT PLAN, Government of South Australia, Consolidated 6 February 2018
- REMEDIATION MANAGEMENT PLAN, Senversa, 2018
- RESIDENTIAL LAND SUPPLY AND DEMAND TRENDS - 2018, Department of Planning, transport and Infrastructure, 2018
- SITE CONTAMINATION AUDIT INTERIM AUDIT ADVICE FORM, Adrian Hall, 2018
- SOUTH AUSTRALIAN PLANNING POLICY LIBRARY – VERSION 6, Government of South Australia, 2011
- STATE PLANNING POLICIES FOR SOUTH AUSTRALIA, Government of South Australia, 2019
- STATE STRATEGIC PLAN, Government of South Australia, 2016
- STATEMENT OF JUSTIFICATION FOR PRIVATELY FUNDED DPA, Ekistics, 2018
- THE 30-YEAR PLAN FOR GREATER ADELAIDE 2017, Department of Planning, Transport and Infrastructure, Government of South Australia 2017
- TRAFFIC INVESTIGATIONS, Cirqa, 2019
Appendix 1: Strategic objectives & priorities

State Government (other strategic documents)


The Plan sets 5 overarching targets which the DPA is considered to meet, as discussed below. In addition, the Plan identifies a range of policies that underpin how these targets can be achieved as well as action plans.

Table 2 - The 30-Year Plan for Greater Adelaide (2017)

<table>
<thead>
<tr>
<th>Planning Strategy Targets</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Containing our urban footprint and protecting our resources</strong></td>
<td>The DPA seeks to rezone land that can support the development of new housing in an established urban area of Adelaide, and this is therefore entirely consistent with assisting in the achievement of this target.</td>
</tr>
<tr>
<td>Target - 85% of all new housing in metropolitan Adelaide will be built in established urban areas by 2045</td>
<td></td>
</tr>
<tr>
<td><strong>2. More ways to get around</strong></td>
<td>The DPA seeks to rezone land that can support future housing and is located in close proximity (and with direct pedestrian connection) to established public transport routes, including the Dudley Park Railway Station and bus routes on Churchill Road and Harrison Road. These public transport routes provide exceptional connectivity from this location, particularly to the CBD.</td>
</tr>
<tr>
<td>Target – 60% of all new housing in metropolitan Adelaide will be built within close proximity to current and proposed fixed line (rail, tram, O-Bahn and bus) and high frequency bus routes by 2045</td>
<td></td>
</tr>
<tr>
<td><strong>3. Getting active</strong></td>
<td>The DPA promotes the use of active transport modes through the provision of walking and cycling access ways, as well as promoting mixed use development opportunities with residential, retail and commercial activities in proximity to these routes.</td>
</tr>
<tr>
<td>Target - Increase the share of work trips made by active transport modes by residents of Inner, Middle and Outer Adelaide by 30% by 2045</td>
<td></td>
</tr>
<tr>
<td><strong>4. Walkable neighbourhood</strong></td>
<td>The DPA seeks to integrate residential development with conjunction with nearby public transport services, centres, and public facilities, which encourage improved walking activity within the locality. Legibility and connectivity to nearby centres and facilities are central principles underpinning this DPA.</td>
</tr>
<tr>
<td>Target - Increase the percentage of residents living in walkable neighbourhoods in Inner, Middle and Outer Metropolitan* Adelaide by 25% by 2045</td>
<td></td>
</tr>
<tr>
<td><strong>5. Housing Choice</strong></td>
<td>A key output of the DPA is the provision of increased housing choices through the provision of a low to medium density housing and medium rise development. This, in conjunction with the traditional low-density formats in the vicinity will provide an improved range of housing choices to reflect the diverse characteristics of the population.</td>
</tr>
<tr>
<td>Target – Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045</td>
<td></td>
</tr>
</tbody>
</table>
The key policies from *The 30-Year Plan for Greater Adelaide* that underpin these targets are identified as follows:

<table>
<thead>
<tr>
<th>Policy / Action</th>
<th>Comment</th>
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<tbody>
<tr>
<td><strong>Transport corridors, growth areas and activity centres</strong></td>
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<tr>
<td><strong>P1</strong> - Deliver a more compact urban form by locating the majority of Greater Adelaide’s urban growth within existing built-up areas by increasing density at strategic locations close to public transport. (Map 2)</td>
<td>The DPA proposes the development of a low to medium density residential nature that optimises its strategic location in proximity to key transport corridors and services. This format of infill development seeks to better utilise physical and service infrastructure in the vicinity and reduce dependence on the private motor vehicle. This is intended to promote active lifestyle, accessibility to goods and services, improved safety and community development. In turn, increased densities in proximity to services enables them to become increasingly economically viable.</td>
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<tr>
<td><strong>P3</strong> - Increase average gross densities of development within activity centres and transit corridor catchments from 15 to 25 dwellings per hectare to 35 dwellings per hectare.</td>
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<td><strong>P4</strong> - Ensure that the bulk of new residential development in Greater Adelaide is low to medium rise with high rise limited to the CBD, parts of the Park Lands frame, significant urban boulevards, and other strategic locations where the interface with lower rise areas can be managed.</td>
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<tr>
<td><strong>P6</strong> - Promote urban renewal opportunities and maximise the use of government-owned land to achieve higher densities along transit corridors.</td>
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<tr>
<td><strong>Design Quality</strong></td>
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<tr>
<td><strong>P27</strong> - Provide for transitions between higher density and multi-storey, mixed-use developments in activity centres, corridors and existing detached housing precincts.</td>
<td>The DPA promotes a mix of housing diversity that provides a range of housing formats to meet the needs of a diverse community. Policy ensures that the mixture of uses and formats are cognisant of adjoining uses and formats to mitigate interface and conflicts.</td>
</tr>
<tr>
<td><strong>P28</strong> - Promote permeable, safe, attractive, accessible and connected movement networks (streets, paths, trails and greenways) in new growth areas and infill redevelopment areas that incorporate green infrastructure.</td>
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<tr>
<td><strong>P29</strong> - Encourage development that positively contributes to the public realm by ensuring compatibility with its surrounding context and provides active interfaces with streets and public open spaces.</td>
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<td><strong>P32</strong> - Encourage higher density housing to include plantable space for trees and other vegetation where possible.</td>
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<tr>
<td><strong>Housing mix, affordability and competitiveness</strong></td>
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<tr>
<td><strong>P36</strong> - Increase housing supply near jobs, services and public transport to improve affordability and provide opportunities for people to reduce their transport costs.</td>
<td>The DPA includes policy that requires development to transition from the new, higher intensity development to the adjacent, lower density residential area. Development is required to consider the context and desired character of the locality.</td>
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<tr>
<td>Policy / Action</td>
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</table>
| **P37** - Facilitate a diverse range of housing types and tenures (including affordable housing) through increased policy flexibility in residential and mixed-use areas, including:  
  - ancillary dwellings such as granny flats, laneway and mews housing  
  - dependent accommodation such as nursing homes  
  - assisted living accommodation  
  - aged-specific accommodation such as retirement villages  
  - small lot housing types  
  - in-fill housing and renewal opportunities. | This will maximise the amenity, health and safety of residents and the larger community, and to mitigate the negative impacts of noise and air quality, as well as quality of life issues such as privacy and access to sunlight at the interface of development.  
  The DPA will also facilitate the transition from an industrial use of the affected area, with numerous amenity, health and safety impacts on the locality, to a more compatible form of development with the surrounding residential areas. |
| **P45** - Promote affordable housing in well located areas close to public transport and which offers a housing mix (type and tenure) and quality built form that is well integrated into the community. | |
| **Health, wellbeing and inclusion** | |
| **P47** - Plan future suburbs and regenerate and renew existing ones to be healthy neighbourhoods that include:  
  - diverse housing options that support affordability  
  - access to local shops, community services and facilities  
  - access to fresh food and a range of food services  
  - safe cycling and pedestrian-friendly streets that are tree-lined for comfort and amenity  
  - diverse areas of quality public open space (including local parks, community gardens and playgrounds)  
  - sporting and recreation facilities  
  - walkable connections to public transport and community infrastructure. | The DPA promotes an increased diversity of housing formats with a focus on medium density residential.  
This includes provision for affordable housing. This is intended to meet the needs of the increasingly diverse community in an area dominated by low rise, detached housing.  
The large site, with majority single ownership, provides a significant opportunity for the development of a coordinated, residential community in middle metropolitan Adelaide with access to a range of public transport services as well as open space and recreation facilities. |
<p>| <strong>P50</strong> - Provide diverse areas of quality public open space in neighbourhoods (especially in higher density areas) such as local parks, community gardens, playgrounds, greenways and sporting facilities to encourage active lifestyles and support access to nature within our urban environment. | |
| <strong>The economy and jobs</strong> | |
| <strong>P55</strong> - Promote certainty to undertake development while at the same time providing scope for innovation. | The DPA will provide certainty for the future development of this site for residential purposes. The establishment of residential growth will provide for the population growth necessary to generate economic growth in nearby centres and commercial areas. |
| <strong>P56</strong> - Ensure there are suitable land supplies for the retail, commercial and industrial sectors. | As part of the investigations for this DPA an assessment is undertaken to ensure that adequate industrial and commercial land is still available within |</p>
<table>
<thead>
<tr>
<th>Policy / Action</th>
<th>Comment</th>
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<tbody>
<tr>
<td></td>
<td>the Council area despite the conversion of the affected area.</td>
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<tr>
<td><strong>Transport</strong></td>
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<tr>
<td>P75 - Increase the number of neighbourhoods, main streets and activity centres where place is given greater priority than vehicle movement by adopting a ‘link and place’ approach.</td>
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<tr>
<td>P76 - Improve the amenity and safety of public transport stops, stations and interchanges by improving their connections to adjacent development and encouraging mixed-use development and housing diversity in close proximity.</td>
<td>The DPA provides for a medium density residential development area that enables direct access to public transport and a local medium density residential population will increase economic certainty for investment purposes.</td>
</tr>
<tr>
<td>P78 - Improve, prioritise and extend walking and cycling infrastructure by providing safe, universally accessible and convenient connections to activity centres, open space and public transport (see Map 8).</td>
<td></td>
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<tr>
<td><strong>Infrastructure</strong></td>
<td></td>
</tr>
<tr>
<td>P83 - Ensure that new urban infill and fringe and township development are aligned with the provision of appropriate community and green infrastructure, including:</td>
<td>The DPA places significant emphasis on pedestrian, cycle movement in a zone. In addition, public transport accessibility will provide alternative mode for longer distances. On this basis, the DPA is able to justify a reduction for minimum parking requirements to reflect the viability of alternative transport modes.</td>
</tr>
<tr>
<td>• walking and cycling paths and facilities</td>
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<tr>
<td>• local stormwater and flood management including water sensitive urban design</td>
<td></td>
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<tr>
<td>• public open space</td>
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<tr>
<td>• sports facilities</td>
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<td>• street trees</td>
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<td>• community facilities, such as child care centres, schools, community hubs and libraries.</td>
<td>Existing policy in the DPA requires that infrastructure be provided to meet the requirements of the proposed development. No change is proposed to this direction.</td>
</tr>
<tr>
<td>P84 - Design and locate community infrastructure to ensure safe, inclusive and convenient access for communities and individuals of all demographic groups and levels of ability.</td>
<td>The investigations have generally concluded that any upgrades required can be accommodated but will be better determined at the development assessment stage. These will also generally be at the cost of the developer.</td>
</tr>
</tbody>
</table>
State Planning Policies for South Australia (January 2019)

The State Planning Policies for South Australia (SPPSA) is the highest order policy document for South Australia’s planning system. It outlines 16 policies which set out the overarching goals for the state and requirements for the planning system.

Table 3

<table>
<thead>
<tr>
<th>State Planning Policy</th>
<th>Comment</th>
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<tbody>
<tr>
<td><strong>SPP 1 Integrated Planning:</strong> Integrated planning coordinates the strategic use of land with the necessary services and infrastructure.</td>
<td>The DPA investigation integrates land use, transport, and infrastructure planning to ensure the policy outcome provides a coordinated response for the strategic use of the affected site.</td>
</tr>
<tr>
<td><strong>SPP 2 Design Quality:</strong> Good design improves the way our buildings, streets and places function, making them more sustainable, more accessible, safer and healthier.</td>
<td>The DPA establishes a policy framework which promotes high quality design on the ground which both achieves the desired development outcome while ensuring that the design is sympathetic and responsive to surrounding uses.</td>
</tr>
<tr>
<td><strong>SPP 3 Adaptive Reuse:</strong> Adaptive reuse of buildings, sites and places in both urban and rural settings can have cultural, social, economic and environmental benefits.</td>
<td>The DPA proposes the rezoning of a site, which is currently being ineffectively utilised for industrial purposes, to a higher and better residential use for the site which is more compatible with its long-standing residential locality.</td>
</tr>
<tr>
<td><strong>SPP 5 Climate Change:</strong> Our future prosperity, the livability of our cities and towns, the health and wellbeing of our communities and the resilience of our built and natural environment all depend on how well we adapt to and mitigate the impacts of climate change.</td>
<td>The DPA provides for a higher density residential development in a highly walkable, cycle friendly urban environment with strong connections to nearby public transport routes, thus promoting the use of alternative transport and reducing car dependency.</td>
</tr>
<tr>
<td><strong>SPP 6 Housing Supply and Diversity:</strong> Our planning system must enable the sufficient and timely supply of land and a variety of housing choices at appropriate locations.</td>
<td>The DPA provides for the growth of housing supply within the locality and allows for a diversification in the housing form in this location.</td>
</tr>
<tr>
<td><strong>SPP 11 Strategic Transport Infrastructure:</strong> The economic and social prosperity of South Australia relies on a transport system that is safe, integrated, coordinated, dependable and sustainable.</td>
<td>The DPA ensures that the proposed rezoning has adequately considered and responded to the potential impacts of future development on the surrounding road and transport network. Additionally, the policies of the DPA ensure that the future development scenario is appropriately integrated with existing and future pedestrian, cycling, road, and public transport infrastructure.</td>
</tr>
<tr>
<td><strong>SPP 14 Water Security and Quality:</strong> Our water dependent ecosystems also rely on access to water so that they can continue to provide cultural, aesthetic, amenity, recreational and tourism benefits. It is therefore vital that we continue to protect and plan for our water now and into the future.</td>
<td>The DPA has investigated that post-development scenario to ensure that water quality requirements can be satisfactorily achieved.</td>
</tr>
<tr>
<td><strong>SPP 15 Natural Hazards</strong>: Natural hazards are an integral part of the South Australian landscape and have the potential to impact on people, property, infrastructure, our economy and the environment. As we continue to grow and develop, we need to plan for and mitigate risks from these hazards.</td>
<td>Stormwater and flooding potential have been investigated to ensure that the site can be utilised for the intended purpose without an unreasonable level of risk.</td>
</tr>
<tr>
<td><strong>SPP 16 Emissions and Hazardous Activities</strong>: Protecting communities and the environment from exposure to industrial emissions and hazards and site contamination is fundamental to the creation of healthy cities and regions.</td>
<td>The previous industrial use of the land has been considered and expert advice has been provided to ensure that the land can be suitably remediated at the development assessment stage to accommodate sensitive residential use.</td>
</tr>
</tbody>
</table>
Port Adelaide Enfield Council
Development Plans

Devon Park Residential Development Plan Amendment

The Amendment
**Amendment Instructions Table**

<table>
<thead>
<tr>
<th>Name of Local Government Area:</th>
<th>City of Port Adelaide Enfield</th>
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</thead>
<tbody>
<tr>
<td>Name of Development Plan:</td>
<td>Port Adelaide Enfield Council Development Plan</td>
</tr>
<tr>
<td>Name of DPA:</td>
<td>Devon Park Residential DPA</td>
</tr>
</tbody>
</table>

*The following amendment instructions (at the time of drafting) relate to the Port Adelaide Enfield Council Development Plan consolidated on 6 February 2018.*

*Where amendments to this Development Plan have been authorised after the aforementioned consolidation date, consequential changes to the following amendment instructions will be made as necessary to give effect to this amendment.*

<table>
<thead>
<tr>
<th>Amendment Instruction Number</th>
<th>Method of Change</th>
<th>Detail what in the Development Plan is to be amended, replaced, deleted or inserted.</th>
<th>Is Renumbering required (Y/N)</th>
<th>Subsequent Policy cross-references requiring update (Y/N) if yes please specify.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Amend</td>
<td>If applicable, detail what material is to be inserted and where. Use attachments for large bodies of material.</td>
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<td></td>
<td>Replace</td>
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<td>Delete</td>
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<td>Insert</td>
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**COUNCIL WIDE / GENERAL SECTION PROVISIONS** (including figures and illustrations contained in the text)

Amendments required: **No**

**ZONE AND/OR POLICY AREA AND/OR PRECINCT PROVISIONS** (including figures and illustrations contained in the text)

Amendments required: **Yes**

**Medium Density Policy Area 73**

1. **Insert**
   - Within the Desired Character Statement paragraph 3, after the words “Cardigan street” insert the following words:
     - ‘at Angle Park, and Belford Avenue and Alexander Avenue at Devon Park,’

2. **Insert**
   - Within the Desired Character Statement paragraph 5, after the words “density envisaged” insert the following words:
     - ‘at Angle Park’

3. **Insert**
   - Within the Desired Character Statement, paragraph 1 following the Land Division heading, immediately before the words “Land division will” insert the following words:
     - ‘At Angle Park,’

4. **Replace**
   - Last paragraph of Desired Character Statement with the following words:
     - “Development of land with a known history of a potentially contaminating activity such as from former industrial uses, will occur once the site has been assessed and remediated to the standard necessary to ensure it is safe and suitable for the proposed uses, including sensitive uses such as residential development.”
## TABLES

### Amendments required: No

### MAPPING (Structure Plans, Overlays, Enlargements, Zone Maps, Policy Area & Precinct Maps)

Amendments required: Yes

### Map Reference Table

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<tr>
<td>5.</td>
<td>Amend</td>
<td>Medium Density Policy Area 73 listing to include reference to Map PAdE/36</td>
<td>N</td>
<td>N</td>
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<tr>
<td>6.</td>
<td>Amend</td>
<td>Affordable Housing Overlay listing to include reference to Map PAdE/36</td>
<td>N</td>
<td>N</td>
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### Map(s)

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<tr>
<td>7.</td>
<td>Replace</td>
<td>Council Index Map, Zone Map PAdE/36, Policy Area Map PAdE/36 with the contents of Attachment A</td>
<td>N</td>
<td>N</td>
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<tr>
<td>8.</td>
<td>Insert</td>
<td>Affordable Housing Overlay Map PAdE/36 as contained within Attachment B</td>
<td>N</td>
<td>N</td>
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</tbody>
</table>
For the purposes of the Development Plan unless otherwise clearly indicated, the locality area/precinct boundaries depicted on or intended to be fixed by Maps PADE/1 to Map PADE/41 inclusive shall be read as conforming in all respects (as the case may require) to the land division boundaries, to the centre line of roads or drain reserves or to the tide boundaries, or to imaginary straight lines joining the positions defined by survey or by the measurements shown on the said maps against which the said locality area/precinct boundaries are shown or otherwise indicated.

Council Index Map
Policy Area Map PAdE/36
Overlay Map PAdE/36
AFFORDABLE HOUSING

Lambert Conformal Conic Projection, IDA394