

**WEST LAKES RESIDENTIAL & MIXED USE DRAFT CODE
AMENDMENT (PRIVATELY FUNDED)**

Lot 100 & Lot 101 Frederick Road, West Lakes

City of Charles Sturt

August 2022

HAVE YOUR SAY	4
1. WHAT IS THE PLANNING AND DESIGN CODE?	5
1.1 Planning and Design Code Framework.....	5
1.2 Overlays.....	5
1.3 Zones.....	5
1.4 Sub zones.....	5
1.5 General Development Policies	5
1.6 Amending the Planning and Design Code.....	5
2. WHAT IS PROPOSED IN THIS CODE AMENDMENT?	7
2.1 Need for the amendment	7
2.2 Affected Area	8
2.3 The Locality and Surrounding Development.....	10
2.4 Summary of proposed policy changes.....	14
3. WHAT ARE THE NEXT STEPS FOR THIS CODE AMENDMENT?	19
3.1 Engagement	19
3.2 How can I have my say on the Code Amendment?	20
3.3 What changes to the Code Amendment can my feedback influence?	21
3.4 What will happen with my feedback?	21
3.5 Decision on the Code Amendment.....	22
4. ANALYSIS.....	23
4.1 Strategic Planning Outcomes.....	23
4.2 Infrastructure planning	35
4.3 Investigations	38
5. REFERENCES	90
ATTACHMENT A – AFFECTED AREA MAPPING AND CURRENT CODE POLICY	91
ATTACHMENT B – CURRENT CODE POLICY MAPS.....	92
ATTACHMENT C – PROPOSED CODE POLICY	98
ATTACHMENT D – STRATEGIC PLANNING OUTCOMES	105
1. State Planning Policies	105
2. Regional Plans.....	110
3. Other Strategic Plans.....	118
ATTACHMENT E – RETAIL ANALYSIS AND ECONOMIC INVESTIGATIONS	121
ATTACHMENT F – TRANSPORT INVESTIGATIONS	122
ATTACHMENT G – HERITAGE ASSESSMENT.....	123
ATTACHMENT H – OPEN SPACE AND URBAN DESIGN INVESTIGATIONS.....	124

ATTACHMENT I – SERVICES INVESTIGATIONS	125
ATTACHMENT J – NOISE INVESTIGATIONS	126
ATTACHMENT K – ARBORMAN PRELIMINARY TREE INVESTIGATIONS	127
ATTACHMENT L - ENVIRONMENTAL INVESTIGATIONS	128
ATTACHMENT M –ODOUR INVESTIGATIONS	129
ATTACHMENT N – EPA LICENCE – SA WATER LOT 101 FREDERICK ROAD	130
ATTACHMENT O – EPA CORRESPONDENCE	131
ATTACHMENT P - REGISTER OF ABORIGINAL SITES AND OBJECTS SEARCH ...	132

DRAFT

HAVE YOUR SAY

This draft Code Amendment is on consultation from <**Dates to be determined**>. During this time you are welcome to lodge a written submission about any of the changes proposed in this draft Code Amendment.

Submissions can be made via one of the following:

a) Online on the SA Planning Portal

https://plan.sa.gov.au/have_your_say/code_amendments

b) Via Charles Sturt YourSay site at <https://www.yoursaycharlessturt.com.au/>

or

emailed to: jgronthos@charlessturt.sa.gov.au

or

Posted to:

- Chief Executive Officer
- City of Charles Sturt
- West Lakes Residential and Mixed Use Draft Code Amendment (Privately Funded)
- PO Box 1
- Woodville SA 5011

A copy of this draft Code Amendment is available for viewing at Council's offices, and libraries.

A Public Meeting at the conclusion of the consultation process will be held to give those who made a written submission and indicated their desire to attend a Public Meeting to make a verbal submission, as well as any other person who wishes to appear before Council's City Services Committee to make representations on the proposed amendments, or add further detail and clarification on a written submission.

The Public Meeting will be held at <**To be determined**> at Council's Civic Centre, 72 Woodville Road, Woodville. Please note that if no submissions are made indicating a desire to be heard, then no Public Meeting will take place.

The Public Meeting is a statutory requirement as part of Council's endorsed Engagement Plan for the draft Code Amendment process to allow an opportunity for any interested person to appear at the Public Meeting and make a verbal submission on the draft Code Amendment.

It is also important to note a decision on the draft Code Amendment will not be made at the Public Meeting.

A subsequent Engagement Report will be prepared and provided to the City Services Committee for its consideration following a review of all the submissions received, summarising all written and verbal representations, suggesting responses to the issues raised and, if necessary, recommended changes to the draft Code Amendment.

1. WHAT IS THE PLANNING AND DESIGN CODE?

The Planning and Design Code (the Code) sets out the rules that determine what landowners can do on their land.

For instance, if you want to build a house, the Code rules will tell you how high you can build and how far back from the front of your land your house will need to be positioned. The Code will also tell you if any additional rules apply to the area where your land is located. For example, you might be in a high bushfire risk area or an area with specific rules about protecting native vegetation.

1.1 Planning and Design Code Framework

The Code is based on a framework that contains various elements called overlays, zones, sub zones and general development policies. Together these elements provide all the rules that apply to a particular parcel of land. An outline of the Code Framework is available on the PlanSA portal.

1.2 Overlays

Overlays contain policies and maps that show the location and extent of special land features or sensitivities, such as heritage places or areas of high bushfire risk.

They may apply across one or more zones. Overlays are intended to be applied in conjunction with the relevant zone. However, where policy in a zone conflicts with the policy in an overlay, the overlay policy trumps the zone policy.

1.3 Zones

Zones are areas that share common land uses and in which specific types of development are permitted. Zones are the main element of the Code and will be applied consistently across the state.

For example, a township zone for Andamooka can be expected to apply to similar townships like Carrieton. Each zone includes information (called classification tables) that describes the types of development that are permitted in that zone and how they will be assessed.

1.4 Sub zones

Sub zones enable variation to policy within a zone, which may reflect local characteristics. An example is Port Adelaide centre, which has many different characteristics to typical shopping centres due to its maritime activities and uses.

1.5 General Development Policies

General development policies outline functional requirements for development, such as the need for car parking or wastewater management. While zones determine what development can occur in an area, general development policies provide guidance on how development should occur.

1.6 Amending the Planning and Design Code

The *Planning, Development and Infrastructure Act 2016* (the Act) provides the legislative framework for undertaking amendments to the Code. With approval of the Minister for Planning and Local Government (the Minister) a Council, Joint Planning Board,

Government Agency or private proponent may initiate an amendment to the Code and undertake a Code Amendment process.

An approved Proposal to Initiate will define the scope of the Amendment and prescribe the investigations which must occur to enable an assessment of whether the Code Amendment should take place and in what form.

The State Planning Commission (the Commission) is responsible under the Act for ensuring the Code is maintained, reflects contemporary values relevant to planning, and readily responds to emerging trends and issues.

The Commission provided independent advice to the Minister for Planning and Local Government on the Proposal to initiate this Code Amendment. The Commission will also provide a report on the Code Amendment (including compliance with the Community Engagement Charter) at the final stage of the Code Amendment process.



2. WHAT IS PROPOSED IN THIS CODE AMENDMENT?

2.1 Need for the amendment

While Charles Sturt Council is the Designated Entity that has initiated the Code Amendment, the process has been funded by the Proponent, Potentia West Lakes Pty Ltd ('Potentia') who have entered into a contract with SA Water (the owners of the land) for the purchase and development of Lot 100 and are currently in the negotiations for the potential purchase of a portion of Lot 101. As such both Lot 100 and Lot 101 form the Affected Area. The Council contain full control over the Code Amendment process and decision-making responsibilities in accordance with the Act.

The Affected Area comprises approximately 19.8 hectares in area with approximate frontages of 365 metres to Lochside Drive and 565 metres to Frederick Road (a State Maintained Road).

The Affected Area has been utilised as the 'Port Adelaide Wastewater Treatment Plant' for SA Water (formerly the Engineering & Water Supply Department) from 1935 until 2004 when it was decommissioned. The decommissioned infrastructure (which was part of the waste-water treatment process) remains on the land. Lot 100 is now surplus to SA Water's infrastructure requirements, with SA Water owning and operating a new re-lift waste-water pumping station built adjacent the southern boundary of the old plant on Lot 101 (on the north-western corner of Frederick Road and Lochside Drive) which is to remain. There is a portion of Lot 101 (with an area of approximately 50m around the periphery of this allotment) which SA Water is currently using for buffering purposes. It is proposed that this land be considered in the investigations as an opportunity for additional public open space.

The *State Planning Policies for South Australia (2019)* is the highest order policy document in South Australia and details the importance of locating medium and higher residential densities and mixed-use development in and near established services and transport corridor catchments to achieve densities required to support the economic viability of these locations.

The *30-Year Plan for Greater Adelaide (2017)* details the Government's aim to contain the urban footprint of Adelaide by increasing residential densities in appropriate areas such as 'Mass Transit Routes'. It aims to accommodate population growth mainly by increasing infill development in established areas.

The City of Charles Sturt will accommodate a portion of the projected population growth, predominantly through achieving greater residential densities in major infill development projects (eg Bowden/Renewal SA, 'West', Woodville West, St Clair, adjacent Kilkenny station), and other infill developments around centres and adjacent to transit corridors. The Affected Area for this Code Amendment qualifies as a site that has major infill development potential in close proximity to existing services including the West Lakes (1.3km to the south-west) and Port Adelaide Urban Activity Centres (1.6km to the north east approx.) along with the Royal Park/Hendon Suburban Activity Centre (1km to the east approx.).

The Attorney General's Department (AGD) June 2021 Land Supply Report (LSR) for Greater Adelaide – Part 2 – Urban Infill outlines that within the Adelaide West Region the projected new dwelling demand over the next ten (10) years will be 10,600 at a projected medium population growth scenario or 15,700 dwellings at a projected high population growth scenario. The LSR anticipates that 30% of the net dwelling increase will come from strategic infill (such as the Affected Area).

Accordingly, the draft Code Amendment investigates policy amendments to encourage low to medium density residential, mixed use and commercial development to make better use of the Affected Area's proximity to Mariners Reserve, the lake frontage, associated recreation areas and western beaches and other established services. The draft Code Amendment also investigates the opportunity for appropriate buffering and open space opportunities surrounding the SA Water Re-lift Facility which is to remain on Lot 101.

2.2 Affected Area

The area(s) affected by the proposed amendment are described as follows and are shown in the maps at **Attachment A, Figure 2.1, Figure 2.3** and **Figure 2.3** on the following pages.

The 19.8 hectares of the Affected Area, being the land bounded by Frederick Road, Lochside Drive and Mariners Reserve is contained within Certificate of Title Volume 6162 Folio 717 (Allotment 100 in Deposited Plan 110755) and Certificate of Title Volume 6162 Folio 718 (Allotment 101 in Deposited Plan 110755).

The Affected Area comprises the existing SA Water, Waste Water Re-lift Facility on Lot 101 as well as the former SA Water Waste Water Treatment Plant on Lot 100 which includes decommissioned infrastructure as follows:

- Primary and secondary sedimentation tanks;
- Aeration tanks;
- Digestion tanks;
- Chlorine dosing facilities;
- Odour control facilities;
- Storage sheds;
- Administration and laboratory buildings;
- Local Heritage Places – Workshop and machinery building; and
- Associated landscaping and carparking areas.

This draft Code Amendment seeks to include a vegetated area of public open space around the re-lift waste facility (refer to Concept Plan in **Attachment C**) with the remaining portion of Lot 101 to remain in the Infrastructure Zone.

The Affected Area contains a Local Heritage Place recognised as the '*Port Adelaide Treatment Works*' with the extent of the listing including: "*The original form of the administration building, main plant building and the garden area located between the original administration building and Frederick Road for a distance of 50 metres to the north and south of the original administration building. Excluding sewerage ponds, all other structures and garden areas to the north, south and fronting Frederick Road.*"

The Affected Area contains a 20m wide easement for sewerage purposes adjoining the Frederick Road boundary. There are no other Land Management Agreements (LMA's) rights-of-way, caveats or encumbrances over the Affected Area.

Figure 2.1 Affected Area



The Affected Area has a frontage to Frederick Road to its east of 565m and a frontage to Lochside Drive to its south of 365m. The Affected Area adjoins residential properties located within the Waterfront Neighbourhood Zone to its immediate north, south and west. The north-western corner of the Affected Area adjoins the Council owned Mariners Reserve.

Frederick Road is dual carriageway, State Maintained Road under the care and control of the Department for Infrastructure and Transport (DIT). Frederick Road is an important north-south thoroughfare east of the lake system, between Grange Road in the south and Old Port Road in the north. Where it passes the Affected Area it carries approximately 14,800 vehicles per day¹. Lochside Drive is a local collector road under the care and control of the City of Charles Sturt ('the Council').

The Affected Area has an existing access point on Frederick Road between Brandwood Steet and Schenker Drive. An existing median opening with right turn lane on Frederick Road provides access into the Affected Area for vehicles travelling south on Frederick Road.

The Affected Land has public transport access with a bus stop for the 371 and 372 loop services to the West Lakes interchange approximately 500m south of the Affected Area and the 118 service to the CBD on Old Port Road, approximately 400m to the north. Frederick Road has dedicated bicycle lanes with connections to wider networks.

Existing development on the Affected Area is relatively uncoordinated in terms of vehicle circulation, parking, signage, landscaping and architectural style (with exception of the buildings comprising the Local Heritage Place). Existing vegetation on the Affected Area includes three (3) Significant Trees and ten (10) Regulated Trees predominantly located around the periphery of the Affected Area. There are small pockets of vegetation central to the Affected Area, with the largest expanse of vegetation to the north-west portion of the Affected Area close to Mariners Reserve.

¹ Department for Infrastructure and Transport traffic data from 2021

2.3 The Locality and Surrounding Development

The Affected Area has a frontage to 'Mariners Reserve' providing direct access to the lake frontage. To the east of the Affected Area, over Frederick Road, there exists large scale commercial and light industrial (employment) land uses. To the north, west and south of the Affected Area (over Lochside Drive) exist predominantly low density detached residential development located within the Waterfront Neighbourhood Zone dating to the original development of West Lakes, as well as a growing instance of medium density infill development.

The Affected Area is within 50 metres of West Lakes Golf Club to the south. 'Cooke Reserve' is located approximately 200 metres south-east of the Affected Area over Frederick Road. The Affected Area is also located approximately 1.1km south of 'Aquatic Reserve' on the corner of Old Port Road and Bower Road to the north.

The Affected Area is located between the Urban Activity Centres of West Lakes located approximately 1.26km to the south-west, Port Adelaide located approximately 1.5km to the north-east and Arndale located approximately 4.4km to the east as depicted in **Figure 2.2** below. The Affected Area is therefore ideally located between and in close proximity to major Activity Centres with direct lake front access.

Figure 2.2 Affected Area Context

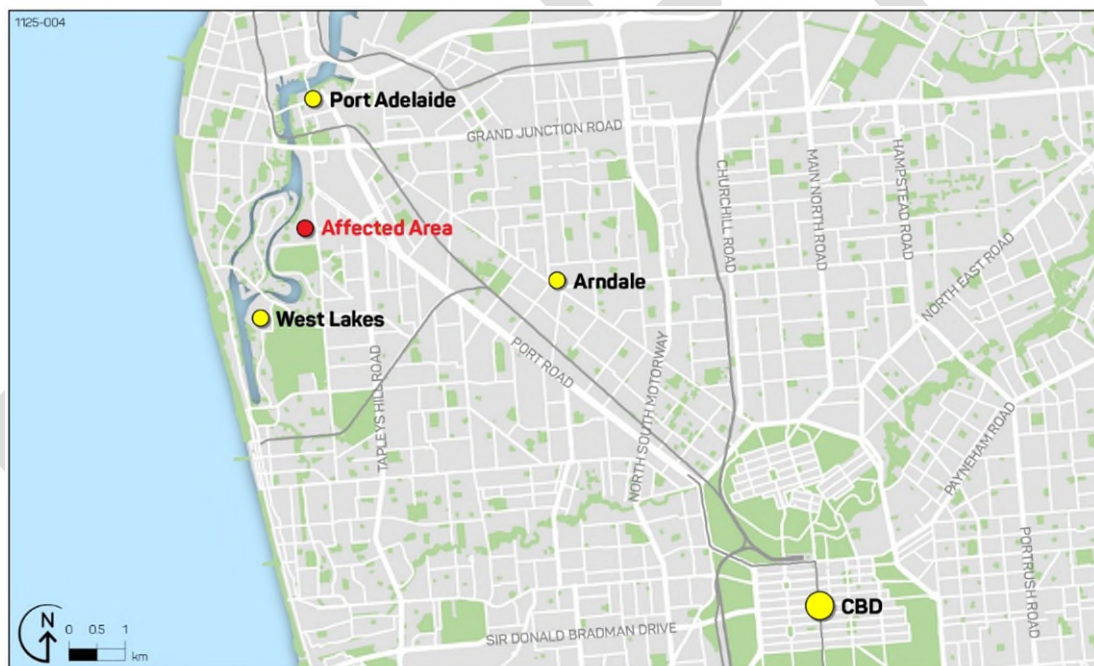


Figure 2.3 Images of Affected Area



The broader locality is serviced by a number of schools including:

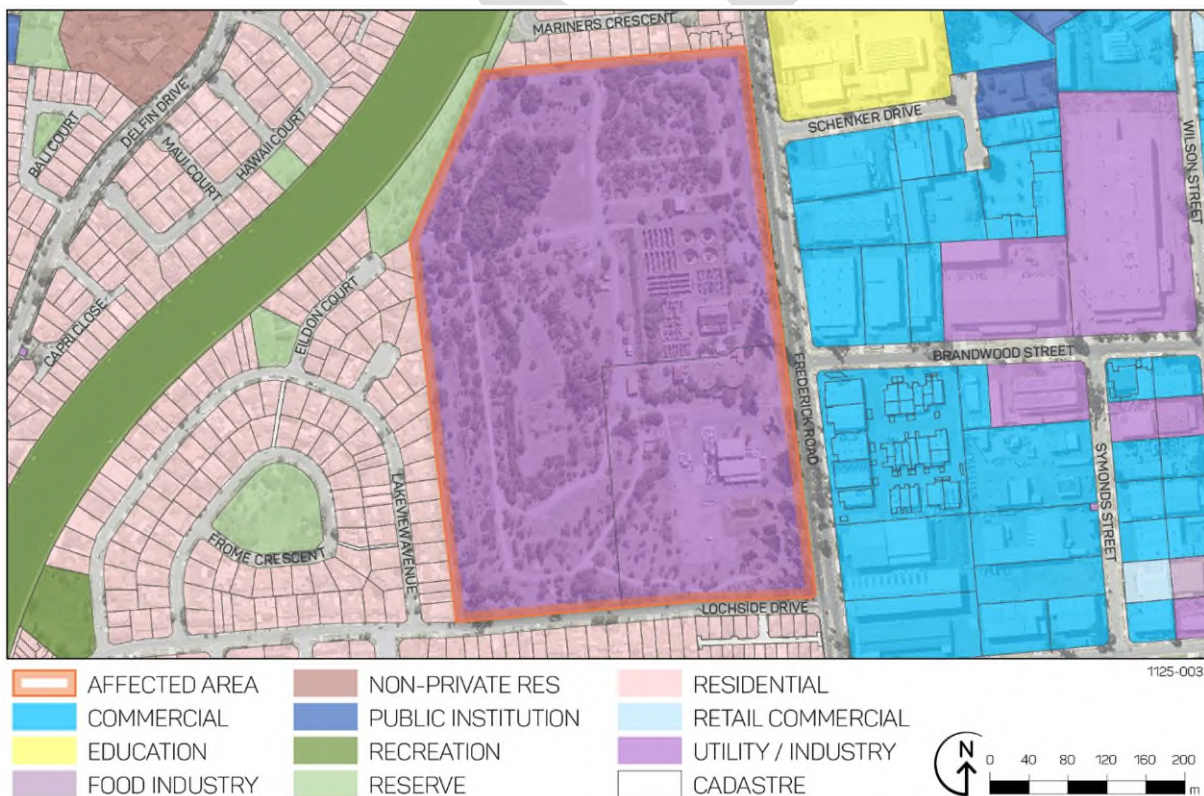
- Portside Christian College;
- Westport Primary School;
- West Lakes Shore Primary School;
- Alberton Primary school;
- Hendon Primary school;
- Seaton High School; and
- Le Fevre High School

The Strategic Employment Zone, on the opposite side of Frederick Road, comprises a range of commercial premises including:

- Kingdom Hall Jehovah's Witness Congregation;
- MTA Training and Employment Centre;
- Automotive collision repair businesses;
- Warehouses and distribution centres;
- Workshops and manufacturing; and
- A small shop ('Café Bar on Frederick').

The mix of land uses is depicted within **Figure 2.4** below.

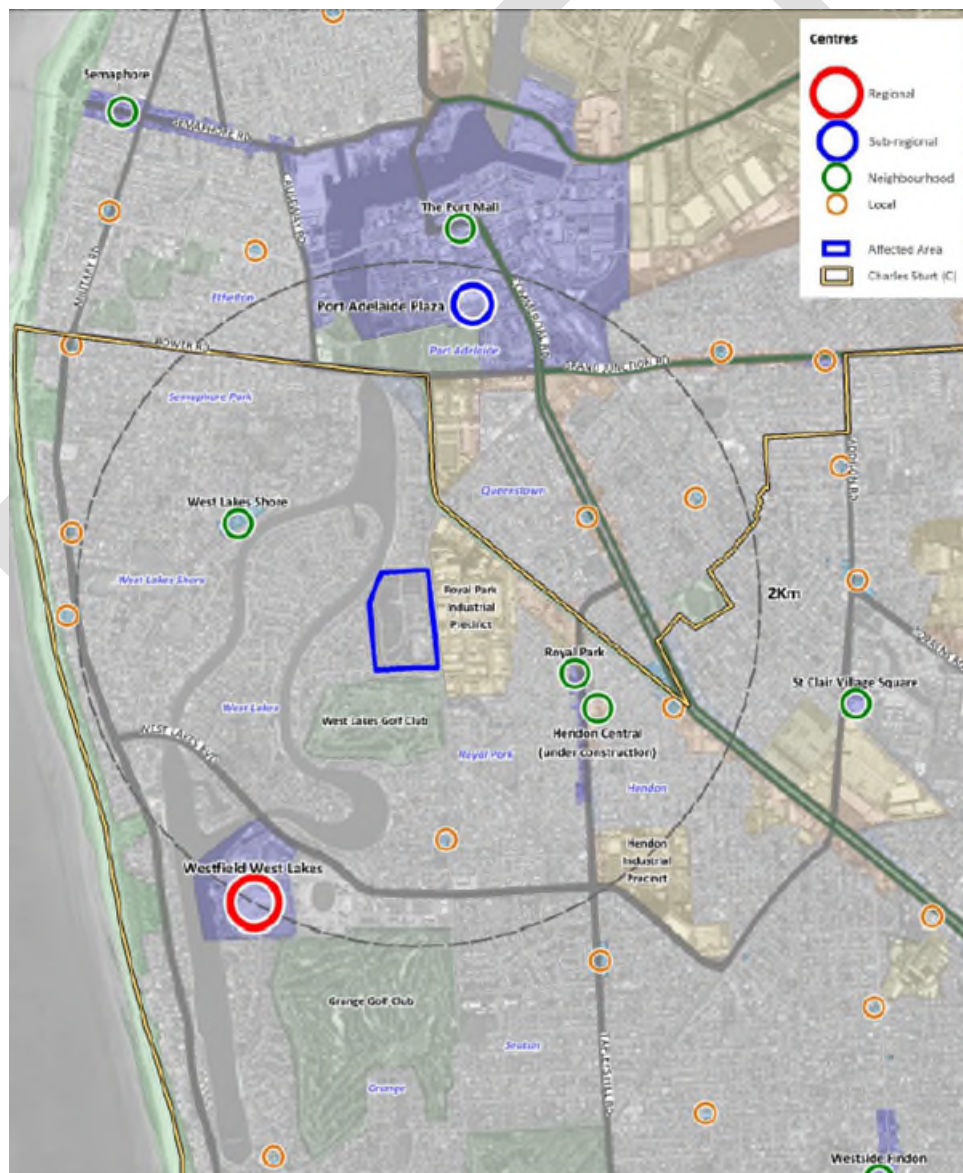
Figure 2.4 Land use mix



Other important land uses close to the Affected Area (refer to **Figure 2.5**) include:

- West Lakes Golf Club, 50 metres to the south;
- Retailing clustered in small nodes on Tapleys Hill Road including a Drakes supermarket in Royal Park and a new centre under construction in Hendon;
- The small 'Woodlake' Local Activity Centre on Frederick Road, 1.2 km to the south;
- The regional shopping centre of Westfield West Lakes and surrounding commercial and leisure uses, 2.4 km by road to the south-west;
- The master planned mixed-use 'West' development located in an Urban Neighbourhood Zone around the former Football Park precinct (with expected full development of 1,600 homes). The first stages of a High Street precinct have been completed with a Carl's Jr burger restaurant, Mosaic Hotel and aged care complex with commercial and retail space. A new library, community hub and medical centre opened in April 2022. The Master Plan shows other future elements including a child care centre; and
- A freestanding ALDI store on Frederick Road, 1.7km to the south.

Figure 2.5 Regional Context



2.4 Summary of proposed policy changes

2.4.1 Current Code Policy

The Affected Area is currently located in the 'Infrastructure Zone' in the South Australian Planning and Design Code, as shown in **Attachment B** and **Figure 2.6** below:

The Infrastructure Zone generally seeks continuation or expansion of existing utility infrastructure as reflected in the following Outcomes for future development:

DO1 The protection, provision, maintenance and expansion of infrastructure services and facilities that support orderly development and vehicular movements

PO 1 Development does not hinder the ongoing operation of existing utility and other infrastructure services or jeopardise the expansion of those services to support economic activity and manage impacts on the environment and community."

Zone DTS/DPF 1.1 outlines the following development forms as being suitable within the zone:

- (a) *Electricity substation*
- (b) *Landfill, including gas extraction plant and equipment*
- (c) *Water treatment and supply*
- (d) *Stormwater retention / detention basin*
- (e) *Sewerage treatment facility*
- (f) *Public service depot*
- (g) *Telecommunications facility*
- (h) *Waste transfer depot*

Figure 2.6 Existing Zoning



The Affected Area is subject to the following Overlays:

Overlays

- Airport Building Heights (Regulated) (All structures over 110 metres) Overlay
Manages the potential impact of buildings and generated emissions to maintain operational and safety requirements of airfields, airports, airstrips and helicopter landing sites.
- Hazards (Flooding General) Overlay
Ensures impacts on people, property, infrastructure and the environment from general flood risk are minimised through the appropriate siting and design of development.
- Local Heritage Place Overlay
Maintains the heritage and cultural values of Local Heritage Places through conservation, ongoing use and adaptive reuse.
- Prescribed Wells Area Overlay
Ensures sustainable water use in prescribed wells areas.
- Regulated and Significant Tree Overlay
Ensures the conservation of regulated and significant trees to provide aesthetic and environmental benefits and mitigate tree loss.
- Traffic Generating Development Overlay
Ensures safe and efficient vehicle movement and access along urban transport routes and major urban transport routes
- Urban Transport Routes Overlay
Ensures safe and efficient vehicle movement and access along urban transport routes.
- Water Resources Overlay
Protects the quality of surface waters in South Australia.

Technical Numeric Variations (TNVs)

There are no Technical or Numeric Variations (TNVs) applicable to the Affected Area.

2.4.2 Proposed Code Policy

The Code Amendment proposes to rezone the Lot 100 and a part of Lot 101 to '**Urban Renewal Neighbourhood Zone**', with the north-eastern portion of Lot 100 along Frederick Road proposed to be located within the '**Mixed Use Transition Subzone**.' The south-east corner of Lot 101 containing the SA Water Re-Lift Facility is proposed to remain within the **Infrastructure Zone**.

The **Urban Renewal Neighbourhood Zone** generally seeks development in the form of residential development with complementary non-residential uses, as reflected in the Desired Outcome:

DO1 Housing and other land uses which no longer meet community preferences are replaced with new diverse housing options. Housing density increases, taking advantage of well-located urban land. Employment and community services will improve access to jobs, goods and services without compromising residential amenity.

Performance Outcome PO 1.1 and the associated Deemed to Satisfy/Designated Performance Feature DTS/DPF 1.1 of the Urban Renewal Neighbourhood Zone provides more specific guidance in relation to envisaged development in the Zone:

<i>Performance Outcome</i>	<i>Deemed-to-Satisfy Criteria/ Designated Performance Feature</i>
<i>PO 1.1</i> <i>Predominantly residential development with complementary non-residential uses that support an active, convenient, and walkable urban neighbourhood.</i>	<i>DTS/DPF 1.1</i> <i>Development comprises one or more of the following:</i> <ul style="list-style-type: none"><i>(a) Ancillary accommodation</i><i>(b) Community facility</i><i>(c) Consulting room</i><i>(d) Dwelling</i><i>(e) Educational establishment</i><i>(f) Office</i><i>(g) Place of Worship</i><i>(h) Pre-school</i><i>(i) Recreation area</i><i>(j) Residential flat building</i><i>(k) Retirement facility</i><i>(l) Shop</i><i>(m) Student accommodation</i><i>(n) Supported accommodation.</i>

The **Mixed Use Transition Subzone** of the Urban Renewal Neighbourhood Zone generally seeks the transition of the area towards mixed use development as reflected in the subzone's desired outcome:

DO1 Development accommodating a range of business, commercial, warehousing and light industrial uses enabling the transition of the area to mixed use development, compatible with residential development.

This subzone is considered appropriate given the existing light industrial land uses over Frederick Road and will provide an appropriate and complimentary transition in land uses.

It is proposed to retain the Overlays that currently apply to the land within the existing Infrastructure Zone. In addition, the draft Code Amendment seeks to introduce the following Overlays and Technical and Numerical Variations over Lot 100 and a part of Lot 101. An explanation of the purpose of each Overlay is also provided in italics.

Overlays

Additional Overlays to be applied to part of the Affected Area include:

- Affordable Housing Overlay
Ensure that Affordable housing is integrated with residential and mixed use development, and that Affordable housing caters for a variety of household structures.
- Stormwater Management Overlay
Ensures that development incorporates water sensitive urban design techniques to capture and re-use stormwater
- Urban Tree Canopy
Ensures that Residential development preserves and enhances urban tree canopy through the planting of new trees and retention of existing mature trees where practicable.
- Urban Tree Canopy Overlay
Ensures that Residential development preserves and enhances urban tree canopy through the planting of new trees and retention of existing mature trees where practicable.
- Heritage Adjacency Overlay
Ensures that development adjacent to State and Local Heritage Places maintains the heritage and cultural values of those places.
- Future Local Road Widening Overlay
Ensures that development is consistent with and will not compromise efficient delivery of future road widening requirements of local roads.

Local Variation (TNV)

- Apply the following Technical and Numeric Variation (TNVs) to part of the Affected Area:
 - Maximum building height is 2 levels
 - Maximum building height is 9m
 - Maximum building height is 3 levels
 - Maximum building height is 12.5m
 - Maximum building height is 4 levels
 - Maximum building height is 16.5m
 - Maximum building height is 5 levels
 - Maximum building height is 22m
 - Minimum future local road widening setback is 2.5m
 - Concept Plan – West Lakes

The proposed Zone, Overlays, Technical Numeric Variation boundaries and Concept Plan are shown in **Attachment C**.

3. WHAT ARE THE NEXT STEPS FOR THIS CODE AMENDMENT?

3.1 Engagement

Engagement on the Code Amendment must occur in accordance with the Community Engagement Charter principles, which require that:

- engagement is genuine;
- engagement is inclusive and respectful;
- engagement is fit for purpose;
- engagement is informed and transparent; and
- engagement processes are reviewed and improved.

An Engagement Plan has been prepared for this Code Amendment to ensure that engagement will be conducted and measured against the principles of the Charter. For more information on the Community Engagement Charter go to the PlanSA portal at (plan.sa.gov.au/en/charter).

A summary of the engagement that is occurring for this Code Amendment is provided as follows:

- An 8-week consultation process;
- A public notice placed within The Advertiser;
- A copy of the draft Code Amendment being placed on the SA Planning Portal https://plan.sa.gov.au/have_your_say/code_amendments;
- Information on Council's 'Your Say Charles Sturt' website - <https://www.yoursaycharlessturt.com.au> with information on the draft Code Amendment including, but not limited to a copy of the draft Code Amendment, FAQs and information on how to make a submission;
- Copies of draft Code Amendment and information brochure to be made available at Council offices and libraries;
- A written notice to all property owners within the Affected Area and adjacent to the Affected Area inviting them to review and comment on the draft policy;
- Invitation to prepare submissions online or via post or by e-mail.
- Information brochure outlining what the draft Code Amendment is about, the proposed policy amendments, how interested persons can comment; and
- Two drop-in sessions.

A Public Meeting (if required) will be held on **<date to be determined>** at the conclusion of the consultation process at which time any interested person may appear before Council's City Services Committee to make a verbal submission on the draft Code Amendment. Please note that if no submissions are made indicating a desire to be heard, then no Public Meeting will take place. The Public Meeting is a statutory requirement as part of Council's endorsed Engagement Plan for the draft Code Amendment process to allow an opportunity for any interested person to appear at the Public Meeting and make a verbal submission on the draft Code Amendment. **It is also important to note a decision on the draft Code Amendment will not be made at the Public Meeting.**

A subsequent Engagement Report will be prepared and provided to the City Services Committee for its consideration following a review of all the submissions received, summarising all written and verbal representations, suggesting responses to the issues raised and, if necessary, recommended changes to the draft Code Amendment.

3.2 How can I have my say on the Code Amendment?

There are several ways in which you can provide feedback on the Code Amendment. This includes:

Submissions can be made via one of the following:

- a) Online on the SA Planning Portal

https://plan.sa.gov.au/have_your_say/code_amendments

- b) Via Council's YourSay website at www.yoursaycharlessturt.com.au

or

emailed to: jgronthos@charlessturt.sa.gov.au

or

- c) Posted to:

Chief Executive Officer
City of Charles Sturt
West Lakes Residential and Mixed Use Code Amendment
PO Box 1
Woodville SA 5011

- d) Attending one of the drop-in sessions:

- **<dates / times to be determined>**

- e) Attending and speaking at the Public Meeting proposed (if required) for this draft Code Amendment (please indicate in your written submission your desire to be heard at the Public Meeting). The Public Meeting will be held on **<date to be determined>**.

3.3 What changes to the Code Amendment can my feedback influence?

Aspects of the project which stakeholders and the community can influence include:

- Appropriateness of the **Urban Renewal Neighbourhood Zone** and **Mixed Use Transition Subzone** over the Affected Area;
- Application of Overlays to the Affected Area;
- Application of Technical and Numeric Variations (TNVs) to the Affected Area; and
- Whether the investigations associated with the Code Amendment have appropriately addressed the following key issues:
 - Whether the proposed **Urban Renewal Neighbourhood Zone** and **Mixed Use Transition Subzone** is the most appropriate zone and subzone for the Affected Area;
 - Transport and parking impact;
 - Stormwater management;
 - Interface impact (including noise and visual appearance);
 - Whether the proposed incremental maximum building heights of between 2-5 building levels as depicted with the Concept Plan is appropriate;
 - Infrastructure and services impacts;
 - Suitability of the Affected Area for the intended use (including potential site contamination); and
 - Economic impact.

Aspects of the project which stakeholders and the community cannot influence are:

- Geography of the Affected Area;
- General Development Policies in the Planning and Design Code (as it relates to state-wide policy); and
- Standard policies and wording contained in Zones and Overlays in the Planning and Design Code (as it relates to State-wide policy).

3.4 What will happen with my feedback?

The City of Charles Sturt is committed to undertaking consultation in accordance with the principles of the Community Engagement Charter and is genuinely open to considering the issues raised by people in the community.

All formal submissions will be considered by the City of Charles Sturt when determining whether the proposed Amendment is suitable and whether any changes should be made. Each submission will be entered into a register and you will receive an email acknowledging receipt of your submission. Your submission will be published on Council's YourSay website and the PlanSA portal. Personal addresses, email and phone numbers will not be published, however company details will be.

The City of Charles Sturt will consider the feedback received in finalising the draft Code Amendment and will prepare an Engagement Report which will outline what was heard during consultation and how the proposed Code Amendment was changed in response to submissions.

The Engagement Report will be considered by Council then forwarded to the Minister, and then published on the PlanSA portal.

3.5 Decision on the Code Amendment

Once the Engagement Report is provided to the Minister, the Commission may provide further advice to the Minister, at the Minister's request, if the Code Amendment is considered significant.

The Minister will then either adopt the Code Amendment (with or without changes) or determine that the Code Amendment should not proceed. The Minister's decision will then be published on the PlanSA portal.

If adopted, the Code Amendment will be referred to the Environment Resources and Development Committee of Parliament (ERDC) for their review. The Commission will also provide the Committee with a report on the Code Amendment, including the engagement undertaken on the Code Amendment and its compliance with the Community Engagement Charter.

4. ANALYSIS

4.1 Strategic Planning Outcomes

4.1.1 Summary of Strategic Planning Outcomes

Development Patterns and Trends

The City of Charles Sturt is experiencing urban renewal in the form of increased residential development, medium density infill dwellings, mixed use infill as well as higher density renewal on key strategic sites.

The Affected Area is located within a local catchment that has grown steadily in the last 5-7 years from a population of 4,070 (approx.) in 2016 to 4,280 (approx.) in 2021 (refer to Deep End investigations in **Attachment E**).

The steady growth has come through a low underlying level of new homes replacing old (two replacing one house) and several large infill / townhouse developments in 2016 and 2017 which saw higher rates of growth in the last 4 years.

Deep End investigations (refer **Attachment E**) found that the area is characterised by:

- A high proportion of older 'singles' and 'couples without children' which is reflected in the older age profile (23% aged 65+ years);
- Couples without children (30%) being the largest family type;
- A small average household size of just 2.28 persons;
- Smaller, ageing households are attracted to the smaller, lower maintenance dwelling stock where 33% are townhouses or semi-detached dwellings;
- A slightly higher proportion of Australian-born residents with no significant groups of overseas-born residents; and
- Many families are long established, evident by the high proportion (68%) living in the same dwelling as 5 years earlier and the high proportion (40%) who fully own their home.

The demographic profile suggests that the affluent, older population of the area (many already living in townhouses) would be well suited to a future dwelling mix on the Affected Area with an increased proportion of townhouses and apartments. This contemporary style suited to smaller families has emerged in the 'West' development in the Urban Neighbourhood Zone at West Lakes.

Larger infill sites present an opportunity to achieve coordinated development at higher densities and with quality built form and public realm outcomes. Consequently, the Affected Area provides an opportunity to deliver approximately 16.98 hectares (excluding the SA Water re-lift facility) of new residential land in a planned and coordinated manner, reducing the reliance upon minor infill to meet housing demand in the City of Charles Sturt. Under a low to medium density residential scenario, the subject land is anticipated to yield in the order of approximately 560 dwelling units.

The Affected Area is well serviced with infrastructure, with only minor enhancement required to facilitate residential use.

Land Supply and Demand

The Attorney General's Department (AGD) June 2021 *Land Supply Report (LSR) for Greater Adelaide – Part 2 – Urban Infill* outlines that within the Adelaide West Region the projected new dwelling demand over the next ten (10) years will be 10,600 at a projected medium population growth or 15,700 dwellings at a projected high population growth. The LSR anticipates that 30% of the net dwelling increase will come from strategic infill (such as the Affected Area).

Economic Analysis

The City of Charles Sturt '*Living Green to 2020 Refresh: Environmental Plan*' (*Living Green*) identifies that the Western Adelaide region is a significant contributor to the state economy with 22.5% of the State's total employment.

The City of Charles Sturt draft '*Your Neighbourhood Plan 2020*' (*Neighbourhood Plan*) identifies that the City contains 10,528 local business which generates a gross regional product in the order of \$5.594 billion. The draft Neighbourhood Plan identifies that projected residential growth of over 1,150 people each year within the Council area will require up to 500 new dwellings across the City of Charles Sturt.

The draft Neighbourhood Plan recognises that:

"Great local open spaces, streets safe for cycling and walking, good quality infill and good shops and community services... these elements make a walkable neighbourhood which has many benefits including residents' health... increased community contact and well-being, more trade of local shops, less household money spent on driving and transport, less congestion and benefits to the environment through more biodiversity and less pollution."

The draft Neighbourhood Plan sets a walkability target of 90% of households being located within 800m of a mix of services and facilities (convenience shop, speciality food, supermarket, post office, bank, pharmacy, GP, dentist, ELC, Child Care). It also seeks an increase of employed persons living and working in the same SA3 ABS statistical area and sets a target in annual employment numbers growth to exceed Adelaide metropolitan average. The proposed **Mixed Use Transition Subzone** of the Urban Renewal Zone will encourage local services and facilities to be developed within walking distance of anticipated future residential development.

The rezoning of the Affected Area is not considered to have a detrimental impact on the existing economic viability of employment uses in the adjoining Strategic Employment Zone over Frederick Road. The Deep End report identified that new residents in the Affected Area itself will generate demands for local services which could be provided within an attractive local node designed into future development. The Deep End report noted that the COVID-19 period is creating a revival in local shopping as consumers seek safe and simplified shopping experiences close to home.

Based on their analysis, Deep End consider that a convenient, small-scale commercial centre on the Affected Area is appropriate and can leverage the daytime population at work and commuter / commercial traffic through the area.

Environmental Impacts

A key strategic planning outcome of the State Planning Policies is to protect communities and the environment from risks associated with emissions, hazardous activities and site contamination. The Affected Area was utilised as an SA Water Sewage Treatment Plant prior to its decommissioning in 2004. This rezoning supports strategic planning outcomes in respect of Environmental Impacts. A Site Contamination Audit Statement (SCAS) (refer to **Attachment L**) has concluded that the Affected Area is suitable for the following sensitive uses, other use or range of uses, subject to the conditions on land and groundwater outlined in the SCAS:

- a. *Sensitive use – residential with garden/accessible soil (home grown produce <10% fruit and vegetable intake, no poultry);*
- b. *Sensitive use – residential with minimal opportunities for soil access; includes dwellings with fully and permanently paved yard space such as high-rise buildings and apartments;*
- c. *Sensitive use – childcare centres, kindergartens, preschools and primary schools;*
- d. *Public open space such as parks, playgrounds, playing fields (e.g. ovals), secondary schools and footpaths;*
- e. *Commercial use such as shops, offices, consulting rooms, petrol filling stations and warehouses; and*
- f. *Industrial use such as light, service, general or special industry.*

The spatial allocation of future public open space proposes to accommodate a portion of an existing area of vegetation within the Affected Area which is considered an important area for biodiversity.

The Code Amendment seeks to introduce the Urban Tree Canopy Overlay over the Affected Area. The Open Space investigations (refer to **Attachment H**) envisage retention of existing vegetation and trees in public open space areas, opportunities for green pedestrian and cycling linkages and green verges through the Affected Area. The draft Neighbourhood Plan outlines that:

“More trees in response to climate extremes, great local open space, streets safe for cycling and walking....make walkable neighbourhoods which has many benefits including resident’s health.. less congestion and benefits to the environment through more biodiversity and less pollution.”

Infrastructure and Services

This proposal is well serviced by both civil and social infrastructure, as sought by the State Planning Policies.

Civil Infrastructure

The Affected Area does not require significant extensions to civil infrastructure and can be appropriately serviced via existing infrastructure located within close proximity.

Discussions between *Potentia West Lakes* (the Proponent) and Council have agreed that stormwater discharge for the Affected Area should be directly connected to the West Lakes water body after water quality improvement via Water Sensitive Urban Design (WSUD) techniques (refer to FMG Infrastructure Investigations in **Attachment I**). The Affected Area is covered by sandy soils which are highly impervious. This lends itself a range of WSUD treatment techniques.

Existing potable water service lines are present along the eastern and southern frontages of Frederick Road and Lochside Drive, . Preliminary consultation with SA Water (refer to **Attachment I**) revealed that the existing network has sufficient capacity to accommodate the anticipated dwelling unit yield.

FMG Investigations found that waste water (sewage) servicing to the Affected Area will require careful consideration in a future development application, given the presence of shallow groundwater and proximity to the existing Re-lift Pump Facility to remain on Lot 101. Preliminary discussion have been held with SA Water (refer to **Attachment I**) who identified a number of options for waste water servicing for future development over the Affected Area.

The Affected Area is serviced by gas mains along both Frederick Road and Lochside Drive. Future development anticipated over the Affected Area will be able to be serviced by these gas lines.

Telstra, Vocus, Optus and TPG communications infrastructure are present in Lochside Drive and Frederick Road. There is an existing Optus fibre connection to the Affected Area from Frederick Road, just south of Schenker Drive. As such, there is sufficient infrastructure already present in close proximity to the Affected Area which is likely to be able to support (or support with minor external augmentation) future development facilitated by the draft Code Amendment.

Existing 11kV underground high voltage SA Power Networks (SAPN) cabling is present along the western verge of Frederick Road, and northern verge of Lochside drive. The network will be able to provide sufficient service to anticipated development over the Affected Area facilitated by the Code Amendment.

Social Infrastructure

Social infrastructure investigations undertaken by Deep End (refer to **Attachment E**) have identified that the Affected Area is suitably supported by existing social infrastructure, and is within close proximity to numerous educational, child-care, retail and medical facilities.

Analysis of the surrounding locality by Deep End found that the following important land uses are located close to the Affected Area:

- West Lakes Golf Club, 50 metres to the south;
- Retailing clustered in small nodes on Tapleys Hill Road including a Drakes supermarket in Royal Park and a new centre under construction in Hendon;
- The small 'Woodlake' Local Activity Centre on Frederick Road, 1.2km to the south;
- The regional shopping centre of 'Westfield West Lakes' and surrounding commercial and leisure uses, 2.4 km by road to the south-west;
- The master planned mixed-use 'West' development located in the Urban Neighbourhood Zone around the former Football Park precinct which is progressing towards an expected full development of 1,600 homes. The first stages of a High Street precinct have been completed with a 'Carl's Jr' burger restaurant, 'Mosaic Hotel' and aged care complex with commercial and retail space. A new library, community hub and medical centre was opened in April 2022. The Master Plan shows other future elements including a child care centre; and
- A freestanding ALDI store on Frederick Road, 1.7km to the south.

Notwithstanding the above key centres and other surrounding land uses identified with the Deep End investigations (refer to **Attachment E**), the Deep End Demand Analysis found that a range of uses can be supported on the Affected Area both through a current deficiency in the area and from the new demands that will flow from anticipated new housing on the Affected Area. These demands will be supplemented by the existing local workforce and passing traffic.

Deep End recommended that future development, facilitated by the Code Amendment, would enable a policy framework for a Local Centre with up to 1,000 sqm gross leasable floor area (GLFA) of shop / retail uses, a gym and other flexible commercial areas (1,000 sqm) that would present a low scale but valuable asset for the local area. A medical centre with other potential allied health professionals would complement the retail, gym and commercial uses.

Existing networks and demand analysis show there could be interest in a fuel site, one or more franchised food outlets and a child care centre on the Affected Area. A policy framework that included ability for complementary non-residential uses that support an active, convenient, and walkable urban neighbourhood is directly aligned with the City of Charles Sturt draft 'Your Neighbourhood Plan 2020' *which seeks to promote good quality infill and good shops and community serviced. These elements make a walkable neighbourhood which has many benefits.*

The Deep End investigations found that the recommended retail floor area and other recommended uses in the Affected Area will have little or no overall effect on the large Port Adelaide and West Lakes centres or the smaller nodes on Tapleys Hill Road and the smaller 'Woodlake' Local Activity Centre.

Integrated Transport

The Affected Area is well integrated with existing transport infrastructure, services and functions, and is considered to support State planning objectives in relation to integrated transport.

Stantec have reviewed integrated transport surrounding the Affected Area (refer to **Attachment F**) and have identified that whilst no bus services are located immediately adjacent the Affected Area, the Affected Area has public transport access with a bus stop for the 371 and 372 loop services to the West Lakes interchange just south of the site and the 118 service to the CBD on Old Port Road, a short distance north (refer to Error! Reference source not found. on the following page).

The rezoning of the Affected Area provides the opportunity to further improve public bus services within the locality based on anticipated population within the Affected Area. This matter is highlighted in Section 4.2 Infrastructure Planning consultation on the draft Code Amendment to be brought to the attention of the Department for Infrastructure – Public Transport Services Division for consideration.

Figure 4.1 Public Transport Services



Pedestrian paths are located on the southern side of Lochside Drive and the eastern side of Frederick Road. Bicycle lanes are located on each side of Fredrick Road. The proposed West Lakes Concept Plan has indicated that future verge widening for footpath and streetscaping be provided on both the Lochside Drive and Frederick Road frontages of the Affected Area. The proposed concept plan shows a pedestrian and cycling link through the Affected Area to the lake frontage. There will be an expectation for footpaths to be provided through a future development of the Affected Area which will form part of a future development application.

Mariners Reserve adjoining the Affected Area consist of scattered planting with a pathway and access steps to the lake. There is a pedestrian path along the lake edge to the north which connects to Settlers Reserve.

The water edge to the south of Mariners Reserve consists of private frontage and the lake access walking route moves away from the water edge cutting through the local street network.

The rezoning of the Affected Area provides the opportunity to improve pedestrian and cycling linkages via Mariners Reserve into the broader West Lakes shore pathway network as well as through the Affected Area to the local street network.

Interface Between Different Land Uses

The proposal will facilitate the creation of a more compatible interface with existing residential development located within the Waterfront Neighbourhood Zone.

Resonate acoustic engineers have undertaken a noise assessment for the Affected Area (refer to **Attachment J**). The noise assessment was undertaken to ensure compliance with relevant requirements arising from the Affected Area's proximity to a State Maintained Road, the relationship between likely future commercial activity and future residential use as well as noise emanating from the SA Water Re-Lift Pump facility which is to remain on Lot 101. This assessment found that existing noise levels were dominated by road traffic from Frederick Road. Any other existing industrial or commercial activities are determined to have a negligible noise impact on the Affected Area. With the anticipated land use mix facilitated by the Code Amendment (as a mixture of commercial and residential), requirements arising from the *Environmental Protection (Noise) Policy ('Noise EPP')* and the 'Interface Between Land Use' provisions of the Planning & Design Code are expected to be appropriate for the control of noise emissions from new noise sources, to both existing and new noise sensitive receivers.

Application of a Noise and Air Emissions Overlay noise attenuation area is not recommended for the Affected Area due to relatively low road traffic noise levels and low noise emanating from the SA Water Re-Lift Pump facility (refer to **Attachment J**). Potential noise issues associated with noise sensitive development in mixed use areas can be addressed through the relevant provisions of the Planning & Design Code and *Noise EPP* as required.

A review was also undertaken of surrounding EPA licensed activities by EnviroScan (refer to **Attachment L**). This review found that within a 1km radius of the Affected Area there were four (4) EPA licenced activities that required a buffer distance as depicted in **Figure 4.2** on the following page.

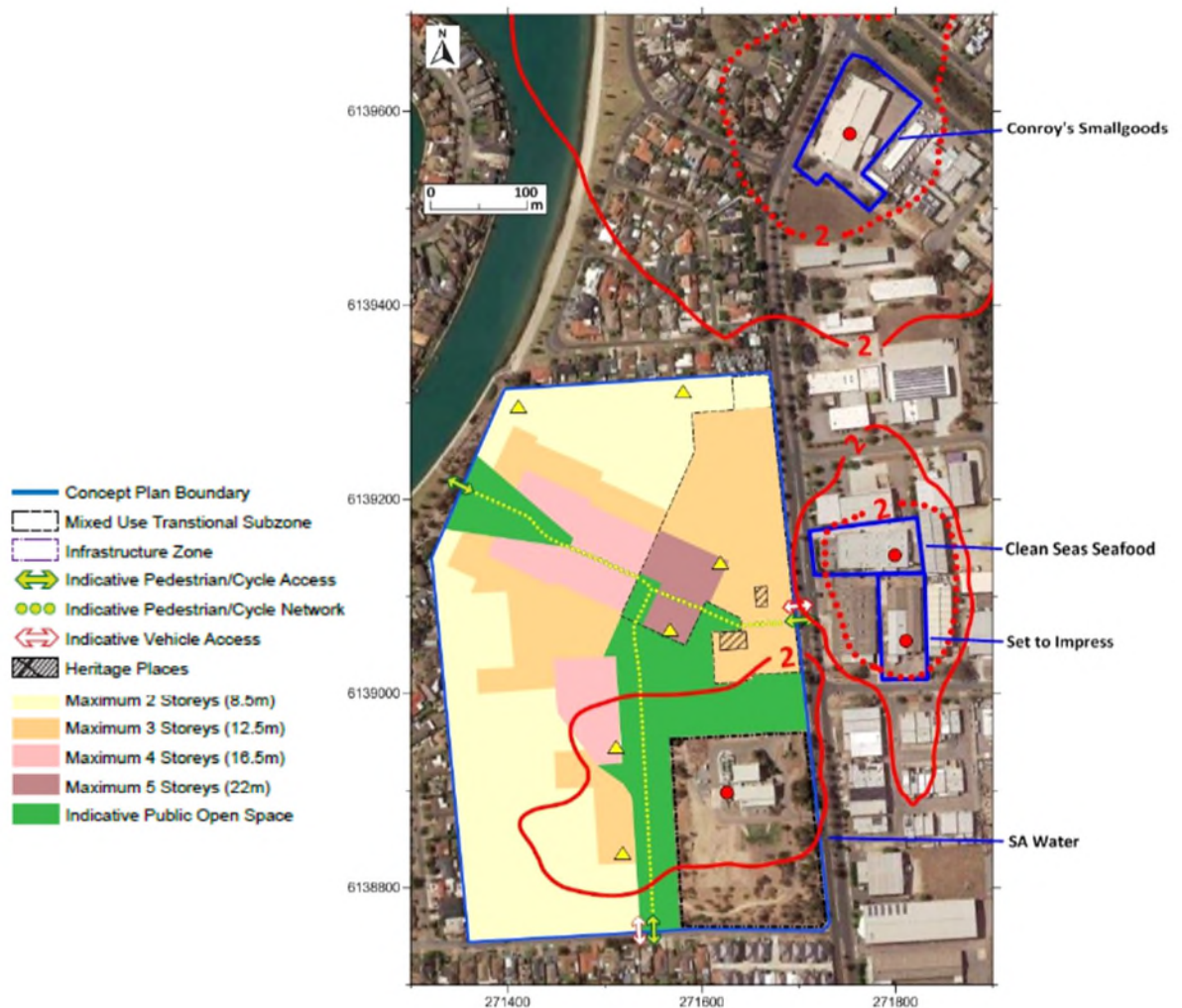
EnviroScan have undertaken odour modelling for these premises over the Affected Area (refer to **Attachment M**) and found that under normal operations, detectable odour would be restricted to within 50 metres of the four (4) odour emitting sites. The *South Australia Environment Protection (Air Quality) Policy 2016* Schedule 3 specifies the maximum ground level concentration (glc) criterion for odour as 2 odour units (2 OU) for a 3-minute average (99.9%ile) in the metropolitan area. In practise this means that the average person can just detect a 2 OU aroma and probably not identify it. In contrast, a 4 OU smell is distinct and the source can probably be recognised.

The SA Water biofilter stack odour source (located on Lot 101 of the Affected Area) is within 100m of anticipated future residential development. The EnviroScan investigations found that under normal operation any odour is contained to the Biofilter exhaust stack. The Re-lift Pump facility is subject to ongoing regulation by the EPA (via EPA licence number 51175). Conditions of

the licence include the implementation of a site specific Odour Management Plan which is regulated and monitored by the EPA.

Advice from the Planning and Land Use Services division of the Department for Trade and Investment outlined that they are “*confident that the measures already in place (including management / legislative requirements under Acts) are adequate to manage noise and odour impacts. Given that there is a very unlikely chance of odour levels reaching unsatisfactory levels, the Code team is satisfied that the Interface Management Overlay is not required in this location.*”

Figure 4.2 EPA Licensed Activities and buffer requirements (Source: Enviro Scan)



It is acknowledged that existing sensitive land uses in the adjoining Waterfront Neighbourhood Zone are typically low density, low-rise building form. To appropriately manage this interface in terms of building height and appropriate separation distances to taller built form, it is proposed to introduce a range of building heights across the Affected Area. Building heights are generally proposed to transition in height from a maximum of 2 building levels and 9 metres along the majority of the northern, southern and portion of the western interface with taller built form (predominantly a maximum of 3 storeys) elsewhere within the Affected Area, with a maximum of 5 storeys and 22 metres centrally located and adjoining the lake frontage. A maximum building height of four (4) storeys is

proposed along the majority of the Frederick Road frontage within the 'Mixed Use Transition Subzone'. This transition in building heights is proposed to be introduced via the application of Technical and Numeric Variations and a Concept Plan (refer to **Attachment C**). The application of this specific policy approach, along with the policy guidance provided in the General Development Policies of the Code, will ensure that built form interface will be appropriately managed and considered by the Relevant Authority during the assessment of future development applications.

4.1.2 Consistency with the State Planning Policies

State Planning Policies define South Australia's planning priorities, goals and interests. They are the overarching umbrella policies that define the state's interests in land use. There are 16 State Planning Policies and six special legislative State Planning Policies.

These policies are given effect through the Code, with referral powers assigned to relevant Government Agencies (for example, the Environmental Protection Agency for contaminated land). The Code (including any Code Amendments) must comply with any principle prescribed by a State Planning Policy.

This Code Amendment is considered to be consistent with the State Planning Policies as shown in **Attachment D**.

4.1.3 Consistency with the Regional Plan

The directions set out in Regional Plans provide the long term vision and set the spatial patterns for future development within a region. This can include land use integration, transport infrastructure and the public realm.

The State Planning Commission has identified that the existing volumes of the South Australian Planning Strategy, prepared under the *Development Act 1993*, will apply until such time as the new Regional Plans are prepared and adopted. Refer to the PlanSA portal for more information on the Commission's program for implementing Regional Plans throughout South Australia.

Where there is conflict between a Regional Plan and the State Planning Policies, the State Planning Policies will prevail.

This Code Amendment is considered to be consistent with the Regional Plan as shown in **Attachment D**.

4.1.4 Consistency with other key strategic policy documents

This Code Amendment aligns with other key policy documents in the following manner:

City of Charles Sturt Community Plan 2020-2027

The 'Community Plan 2020-2027' sets out the long-term strategic vision and plan for the City of Charles Sturt and provides high-level guidance to the Council and the community (refer to **Attachment D**).

The Community Plan shows how the Council will achieve the shared vision of a strong, connected community with exciting places, sustainable strategies and economic growth.

The Code Amendment contributes to achieve the vision of the Community Plan by:

- Unlocking the development potential of a key site along a State Maintained Road corridor and immediately adjoining Mariners Reserve and the lake frontage;
- Activating the streetscape and provide additional housing options for the local community;
- Provide a diversity of complementary land uses that will contribute to a vibrant and dynamic community which will grow economic development within the City;
- Increasing the provision of public open space;
- Introducing the Urban Tree Canopy Overlay; and
- Increasing the opportunity for adaptive reuse of existing Local Heritage Places.

Attorney General's Department – Land Supply Report for Greater Adelaide

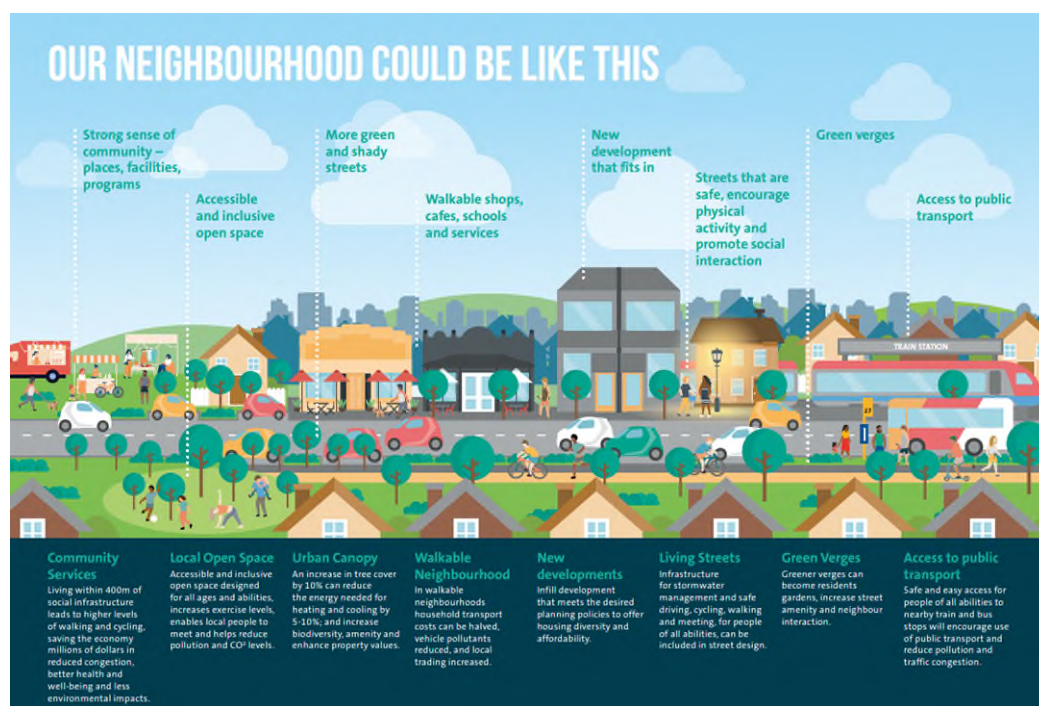
The *Land Supply Report (LSR) for Greater Adelaide* coordinated by the Planning and Land Use Services Directorate (PLUS) of the Attorney-General's Department (AGD) provides a single source of data around residential and employment land trends, land supply and estimated future demand for both a medium and high population growth scenarios (Refer to **Attachment D**).

The Code Amendment will assist to deliver low to medium density residential development over portion of the Affected Area to contribute to land supply within the western region of Adelaide in accordance with the LSR.

City of Charles Sturt draft 'Your Neighbourhood Plan 2020'

The draft '*Your Neighbourhood Plan*' recognises the City's important role in Adelaide's residential growth, which anticipates growth over 1,150 people each year in Charles Sturt requiring 500 new dwellings. The Plan sets out Council's strategy for improving the liveability of urban neighbourhood via the techniques depicted in **Figure 4.3** on the following page.

Figure 4.3 Extract of draft Neighbourhood Plan Strategies



The Code Amendment will provide a policy framework that facilitates infill development which offers housing diversity in a walkable neighbourhood. The Code Amendment will facilitate a policy framework to encourage the development of local services in a 'Mixed Use Transition Subzone' to support new and existing residences within a 400m radius.

City of Charles Sturt Living Green to 2020 Refresh

'Living Green to 2020' is the City of Charles Sturt's environmental plan, it describes how Council will approach environmental issues for the coming years, in partnership with the community.

The Plan identifies that we all interact with environmental services such as water and energy production, public transport services, walking and cycling infrastructure and the stormwater and other systems that keep our communities running smoothly.

The Code Amendment provides a policy framework that facilitates integrated planning to create a sense of community whilst also contributing to environmental sustainability which is a key strategy of 'Living Green to 2020.' The Code Amendment will facilitate the provision of additional public open space (including retention of an area of existing valued biodiversity); extending the Urban Tree Canopy Overlay and Stormwater Management Overlay over the Affected Area.

4.2 Infrastructure planning

The following infrastructure planning is relevant to this Code Amendment:

Council Infrastructure Planning	Response/Comment
Roads	<p>Stantec have undertaken traffic forecasting (contained within Attachment F) based upon the likely anticipated land uses facilitated by the draft Code Amendment.</p> <p>The investigations have concluded that the predicted impact on the adjacent road network will cause an increase in traffic on Lochside Drive and Frederick Road, however the resultant traffic volumes for each road will remain within the available capacity and the intended function of these roads.</p> <p>Intersection analysis using SIDRA modelling found that the existing intersection arrangement, including the existing length of right turn lane into the Affected Area on Frederick Road, will be suitable to cater for the anticipated traffic volumes from the envisaged land uses in the Affected Area.</p> <p>Modelling demonstrated that the existing Lochside Drive/Frederick Road intersection can continue to operate satisfactorily with the existing traffic control (Stop sign). No changes were recommended.</p>
Stormwater Management	<p>As outlined in Section 4.1.1, discussions between <i>Potentia West Lakes</i> and Council have agreed that stormwater discharge for the Affected Area should be directly connected to the West Lakes water body after water quality improvement via Water Sensitive Urban Design (WSUD) techniques (refer to FMG Infrastructure Investigations in Attachment I).</p> <p>The Affected Area is covered by sandy soils which are highly impervious. This lends itself a range of WSUD elements. The FMG Investigations found that 1% AEP storm event major storm flows will be safely conveyed directly into the West Lake system, without detention requirements or any noticeable effect on existing downstream stormwater networks.</p>
Waste Management	<p>It is anticipated that future residential development will utilise Council's current waste collection system. This will be confirmed during the development application stage of future land division and built form development over the Affected Area.</p>

Government Agency Infrastructure Planning	Response/Comment
Roads (Commissioner of Highways/Department of Infrastructure and Transport).	<p>Frederick Road is a State Maintained Road under the care and control of the Commissioner of Highways.</p> <p>The 'Traffic Generating Development Overlay' and 'Urban Transport Routes Overlay' will continue to be applied to the Affected Area. Through the continued application of these overlays, the Code Amendment ensures that the relevant policies managing future traffic movements, carparking and the like are provided for the Affected Area to guide future development and manage impacts on the State Maintained Road.</p>
Public Transport	<p>As the rezone will anticipate a future population of approximately 1,290 people further consideration needs to be made by the DIT – Public Transport Division on future allocation of bus services along Frederick Road to cater for the anticipate population. The Department will be directly notified of the draft Code Amendment as part of the consultation process to seek their input.</p>

Potable water (SA Water)	As outlined in Section 4.1.1 existing potable water service lines are present along the eastern and southern frontages of Frederick Road and Lochside Drive, consisting of a 200 Cast Iron Concrete Lined (CICL) main, and 150mm AC main on each road respectively. Preliminary consultation with SA Water (refer to Attachment I) revealed that the existing network has sufficient capacity to accommodate the anticipated dwelling unit yield.
Sewer (SA Water)	As outlined in Section 4.1.1 preliminary discussions have been held with SA Water (refer to Attachment I) who identified a number of options for servicing anticipated future development over the Affected Area, including by either direct connection into the base of the pump chamber within the Re-lift Facility on Lot 101, or connection into the existing rising main in Frederick Road. The preferred method of waste water design and final detail of connections will form part of a future development application.
Electricity	As outlined in Section 4.1.1 existing 11KV high voltage SA Power Networks (SAPN) underground cabling is present along the western verge of Frederick Road, and northern verge of Lochside Drive. High voltage power to the full extent of the Lochside Drive and Frederick Road frontages suggests the network will be able to provide sufficient service to anticipated development over the Affected Area.
Gas	As outlined in Section 4.1.1 the Affected Area is serviced by gas mains along both Frederick Road and Lochside Drive. Future development anticipated over the Affected Area will be able to be serviced by these gas lines, however minor augmentation to potentially connect the 110mm diameter service through to the 63mm main in Frederick Road may be required.
Communications	The area is serviced by the multiple carriers of the 4G network. The NBN is active within the area and has capacity to service the Affected Area.

The existing infrastructure has sufficient capacity to service the Affected Area. As such no further agreements or other arrangements are required to fund the infrastructure as part of the Code Amendment process. Infrastructure assets that will ultimately be vested with Council will be subject to further agreement with Council to ensure that relevant infrastructure is consistent with Council requirements.

Water, electricity and gas will be provided by the relevant services providers with associated costs for connection to be met when the Affected Area is ultimately developed.

4.3 Investigations

4.3.1 Investigations undertaken

The extent of investigations that have been undertaken as part of the Code Amendment process have been agreed by the Minister in the 'Proposal to Initiate'.

The following investigations have been undertaken to inform this Code Amendment:

- Assessment of potential Zones;
- Retail analysis assessment;
- Desired Urban Form and Density Analysis;
- Building Performance and Amenity;
- Transport Impact assessment;
- Heritage Impact Assessment;
- Open Space Assessment;
- Services assessment; including:
 - SA Water (for potable water, recycled water and sewer);
 - Stormwater
 - SA Power Networks (for electricity);
 - APA Group (for gas reticulation); and
 - National Broadband Network (NBN) (for telecommunications).
- Flightpath Building Height Limits Investigations;
- Interface (Noise and air emissions) Investigations;
- Preliminary Tree Assessment;
- Environmental Investigations;
- Affordable Housing; and
- Waste Management.

Further details on investigations undertaken in support of the Code Amendment are included in **Attachments E to P**.

4.3.2 Assessment of Potential Zones

The rationale for the Code Amendment (as outlined in the '*Proposal to Initiate*' document), is to establish a mixed-use development outcome to accommodate a range of low rise (1-2 storey) low to medium density residential development as well as medium rise (3-6 storey) medium to high density residential development and supporting commercial services and facilities (subject to investigation findings) in a future master planned community over the Affected Area.

The 'Proposal to Initiate' document suggests the following possible rezoning policy options to achieve such an outcome (noting that one or more of the zones could apply to all or parts of the Affected Area):

1. Urban Renewal Neighbourhood Zone
(or a similar Neighbourhood-Type Zone)
2. Mixed Use Subzone of one of the Neighbourhood- Type Zones
3. Infrastructure Zone
4. Local Activity Centre Zone;
5. Community Facilities Zone

Most Neighbourhood Zones within the Planning and Design Code predominantly support and focus on residential development in urban and suburban areas as well as greenfield residential developments.

In assisting to determine the most appropriate zoning for the Affected Area, the '*People and Neighbourhoods Policy Discussion Paper September 2019*' prepared by the State Planning Commission provides useful guidance in relation to the land uses and the intended intensity/location of development sought by the various zones within the Planning and Design Code.

0 on the following page provides a helpful snapshot of the naming convention of zones. **0** assists in the determination of the appropriate zone for the Affected Area based on its location and the stated rationale of achieving a more supportive policy framework for a range of low rise (1-2 storey) low to medium density residential development as well as medium rise (3-6 storey) medium to high density residential development and supporting commercial services and facilities.

Figure 4.4 Settlement Plan and Zoning Intent (adapted from “People and Neighbourhoods Policy Discussion Paper September 2019”)

SPP Settlement Pattern	Proposed Residential Zones
Capital City 	<p>City Living: The primary residential zone in the CBD, delivering high amenity, low to medium density residential living environments, with a mix of small-scale non-residential activity compatible with this use.</p>
Urban Centres 	<p>Urban Neighbourhood: Supports the highest density and mix of land uses outside the CBD, including residential, retail, office, commercial and civic, in locations where there is significant opportunity to increase the development density around a major public transit node or corridor, or a significant place of interest.</p> <p>Urban Corridor (Living): Supports the development of high-density, vibrant, mixed-use neighbourhoods that provide a variety of new housing choices, along with a range of complementary retail and commercial activities. Development will generally have a greater proportion of housing than retail or commercial development.</p>
Suburban Areas and Townships 	<p>Urban Renewal: Caters for the renewal of sites with medium and high-density housing in precincts where the housing stock is being replaced as it no longer meets market and community needs.</p> <p>Housing Diversity Neighbourhood: Supports the replacement of existing dwellings with medium-density housing, primarily in the form of terrace housing, group dwellings or apartment buildings.</p> <p>Suburban Neighbourhood: Caters for areas of very low-density, heritage, character and foothill locations, with larger allotments on sloping land.</p> <p>General Neighbourhood: Will apply to most of the residential land in Greater Adelaide and some Regional Areas. Supports low-medium density housing of one to two storeys, with a mix of small-scale shops, offices and consulting rooms, as well as larger scale community services and facilities (e.g. schools, childcare and recreation facilities).</p>
Suburban Areas and Townships (Continued) 	<p>Suburban Master-Planned Neighbourhood: Supports master-planned communities, including planning for employment and retail facilities, in an integrated activity centre.</p> <p>Suburban Greenfield Neighbourhood: Supports low-rise greenfield development in areas that will not include an activity centre.</p> <p>Residential Park: Caters for affordable, short-term and long-term housing opportunities (in the form of caravan and camping sites, cabins and transportable dwellings) and associated small-scale services and facilities, in an open landscaped setting.</p> <p>Township: An urban centre supporting a range of residential, community, retail, business, commercial and light industry uses and facilities to serve the local community, businesses and visitors.</p>

As depicted in **0**, a Neighbourhood-Type Zone within the 'Suburban Areas and Townships' suite of zones would be most suitable to achieve the rational of the Code Amendment. Consideration of each Zone is provided within **Table 4.1** below. The Urban Neighbourhood Zone has not been included in the analysis below as it envisages a much higher density and higher built form along with larger retailing gross leasable floor area than anticipated by this Code Amendment.

Table 4.1 Suburban Areas and Townships Zone Analysis

Zone	Desired Outcome	Planning Analysis
Urban Renewal Neighbourhood Zone	<i>DO1: Housing and other land uses which no longer meet community preferences are replaced with new diverse housing options. Housing density increases, taking advantage of well-located urban land. Employment and community services will improve access to jobs, goods and services without compromising residential amenity</i>	<ul style="list-style-type: none"> ○ Envisages a diverse range of housing options combined with mixed use development to serve the local community. ○ Current land use over the Affected Area is surplus to SA Water needs and no longer meets community preferences. ○ Affected Area is well located between the West Lakes and Port Adelaide Urban Activity Centres and located on the lake frontage in close proximity to walking/cycling trails and reserves.
Housing Diversity Neighbourhood Zone	<i>DO 1: Medium density housing supports a range of needs and lifestyles, located within easy reach of a diversity of services and facilities. Employment and community service uses contribute to making the neighbourhood a convenient place to live without compromising residential amenity.</i>	<ul style="list-style-type: none"> ○ Supports desired medium-density housing ○ However, Zone discussion paper predominantly envisages this Zone to cater for terrace housing, group dwellings or apartment built forms. ○ The vision for the Affected Area seeks to combine a mix of more traditional low-rise (1-2 storey) detached and semi-detached built form with pockets of medium density, medium rise (3-6 storey) apartment sites. ○ Zone could discourage the potential for more traditional lower density detached dwellings if it

		were to be applied over the Affected Area.
Suburban Neighbourhood Zone	<i>DO 1: Low density housing is consistent with the existing local context and development pattern. Services and community facilities contribute to making the neighbourhood a convenient place to live without compromising residential amenity and character.</i>	<ul style="list-style-type: none"> ○ Zone envisages low density housing which does not align with rational for Code Amendment of a mixture of low and medium density housing options.
General Neighbourhood Zone	<i>DO1: Low-rise, low and medium-density housing that supports a range of needs and lifestyles located within easy reach of services and facilities. Employment and community service uses contribute to making the neighbourhood a convenient place to live without compromising residential amenity.</i>	<ul style="list-style-type: none"> ○ Zone envisages low rise built form which does not align with the rational for the Code Amendment which seeks a mixture of low rise and medium rise built form.
Master Planned Neighbourhood Zone	<i>DO1: A new or expanding community with a diverse range of housing that supports a range of needs and lifestyles located within easy reach of a diversity of services, facilities and open space.</i>	<ul style="list-style-type: none"> ○ Zone provides some outcomes which are envisaged over the Affected Area such as a diverse range of housing in close proximity to services and open space; ○ Policy Discussion Paper considered this zone to be more suitable to a Greenfield form of development were a new activity centre and services are to be established rather than a strategic infill site such as the Affected Area.
Waterfront Neighbourhood Zone	<i>DO1: A diverse range of housing which takes advantage of waterfront locations. Development enhances public access to waterfront areas. Dual aspect allotments incorporate designs to enhance the streetscape</i>	<ul style="list-style-type: none"> ○ Supports Code Amendment rational of diverse range of housing taking advantage of waterfront location; ○ Maximum Building Height TNV for this zone only envisages up to 3 building levels which does not align with rational of Code Amendment for medium rise built form 3-6 storeys.

As outlined in **Table 4.1**, the Urban Renewal Neighbourhood Zone DO 1 seeks:

DO1 Housing and other land uses which no longer meet community preferences are replaced with new diverse housing options. Housing density increases, taking advantage of well-located urban land. Employment and community services will improve access to jobs, goods and services without compromising residential amenity.

Urban Renewal Neighbourhood Zone PO 2.1 and associated DTS/DPF 2.1 allow for the application of a Maximum Building Height TNV to be spatially applied over the Affected Area. Urban Renewal Neighbourhood Zone PO 9.1 and DTS/DPF 9.1 also enable the application of a 'Concept Plan' over the Affected Area. Building heights and setbacks are controlled via minimum setbacks in PO5.1, PO 5.2, PO 6.1 and PO 7.1.

The rationale for the Code Amendment as stated in the '*Proposal to Initiate*' outlined the possibility of either a Local Activity Centre Zone, Community Facility Zone or a 'Mixed Use Subzone' of one of the 'Neighbourhood-Type Zones' may be required to provide a focus for retail, commercial and recreational facilities (subject to further investigations). The Deep End retail and commercial land use investigations (refer to **Attachment E** and Section 4.3.3) found that:

"The West Lakes Residential and Mixed Use Code Amendment presents an opportunity to activate an underutilised site with new housing and a range of commercial uses servicing existing residents and new families.

The Affected Area and its local catchment have a range of positive attributes which support local retail and commercial uses on Frederick Road.

A Local Centre with up to 1,000 sqm of shop / retail uses, a gym and other flexible commercial areas (1,000 sqm) would present a low scale but valuable asset for the local area. A medical centre with potentially other allied health professionals would complement the retail, gym and commercial uses.

Existing networks and demand analysis show there could be interest in a fuel site, one or more franchised food outlets and a child care centre on the land.

Table 4.2 on the following page provides an analysis of the zones against the Deep End investigations.

Table 4.2 *Mixed Use, Centre and Facilities Zone Analysis*

Zone	Desired Outcome	Planning Analysis
Local Activity Centre Zone	DO1: Provision of a range of community, educational, recreational and health care facilities	<ul style="list-style-type: none"> No minimum GLFA for shop or envisaged floor area for offices however DO1 seeks that scale that service the local community Maximum building PO 3.1 and DTS/DPF 3.1 enables a maximum building height TNV only to building height 3 levels or 12m which does not align to the Code Amendment vision of medium rise (3-6 storey) built form.
Community Facilities Zone	<i>DO1: Provision of a range of community, educational, recreational and health care facilities.</i>	<ul style="list-style-type: none"> This Zone is more aligned to regional community facilities such as schools and hospitals or regional sports facilities. The Deep End land use investigations do not anticipate land uses of this scale over the Affected Area.
Mixed Use Transition Subzone of the Urban Renewal Neighbourhood Zone	<i>DO1: Development accommodating a range of business, commercial, warehousing and light industrial uses enabling the transition of the area to mixed use development, compatible with residential development."</i>	<ul style="list-style-type: none"> Subzone PO 1.4 and DTS/DPF1.4 envisages shops up to 500m²; Subzone envisaged land uses in DTS/DPF 1.1 include offices, shops, licenced premises, hotels, training facilities and light industry.

The Mixed Use Transition Subzone as outlined in **Table 4.2** would allow for appropriate transition from the adjoining 'Strategic Employment Zone' over Frederick Road to the sensitive land uses anticipated over the majority of the Affected Area.

This is an appropriate outcome to ensure that future retail development occurs within a 'Mixed Use Transition Subzone' over part of the Affected Area and this does not compromise the role, function and primacy of the existing 'Urban Activity Centre Zones' located at Port Adelaide and West Lakes along with the 'Suburban Activity Zone' in Royal Park/Hendon.

The application of the proposed 'Mixed Use Transition Subzone' over part of Lot 100 of the Affected Area would therefore complement the role of the 'Woodlake' Local Activity Centre Zone on the corner of Frederick Road and Lochside Drive located 1.2km (approx.) to the south, by supporting a range of small-scale shops,

offices and businesses whilst not undermining the role and function of the larger existing 'Urban Activity Centre' and 'Suburban Activity Centre Zones'.

A balance between low to medium density housing, transitioning interface height provisions and consideration of an appropriate land use mix will therefore be facilitated through the adoption of the 'Urban Renewal Neighbourhood Zone' over the Affected Area (excluding part of Lot 101 accommodating the SA Water Re-lift Pump Facility) and the adoption of the 'Mixed Use Transition Subzone' over portion of the 'Urban Renewal Neighbourhood Zone' fronting Frederick Road. This is directly aligned with the overall intent of the draft Code Amendment as envisaged by the 'Proposal to Initiate'.

The SA Water Re-lift Pump Facility is to remain on part of Lot 101. The open space investigations (refer **Attachment H**) envisage an area of public open space to be vegetated to form a 'buffer' surrounding this facility. In order to ensure the ongoing viability of this infrastructure, and any required future upgrades, it is recommended that the portion of the Affected Area containing the SA Water Re-lift Pump Facility will remain within a reconfigured 'Infrastructure Zone' boundary.

Policy Implications

The Urban Renewal Neighbourhood Zone and Mixed Use Transition Subzone are considered the most appropriate policy response over Lot 100 and a part of Lot 101 of the Affected Area, with the balance of Lot 101 containing the SA Water Re-lift Pump Facility to remain in the Infrastructure Zone.

4.3.3 Retail Analysis and Economic Investigations

Background

Deep End have undertaken a retail and economic analysis for the Affected Area (refer to **Attachment E**) on the basis that the one of the above Zones identified in Section 4.3.2 would be selected to accommodate low to medium density housing together with a mixed use area fronting Frederick Road. The Deep End analysis is based on a total yield of approximately 560 dwelling units '(rounded up)' comprising a mix of traditional detached dwellings (approximately 358 dwelling units) and apartments (approximately 196 dwelling units).

Deep End Services were engaged to undertake an assessment of the proposed Code Amendment with respect to land use and economic impact. More specifically, Deep End Services have:

- Reviewed the surrounding locality, including:
 - Land use mix,
 - Existing and projected population ABS data including age profile;
 - Existing and project dwelling types and demographic housing profile;
 - Existing services (including retail, commercial, medical, health and fitness and childcare);
 - Distribution and size of workforce and ABS Journey to Work zones; and
 - Location and type of public open space and recreation areas;
- Undertaken a high level assessment and recommendations of a range of land uses that could be planned for and developed over the Affected Area; and

- Provided recommendations of the indicative land use area requirements for the Affected Area.

Findings

In terms of population, demographic and housing profile for the Affected Area, Deep End have confirmed that:

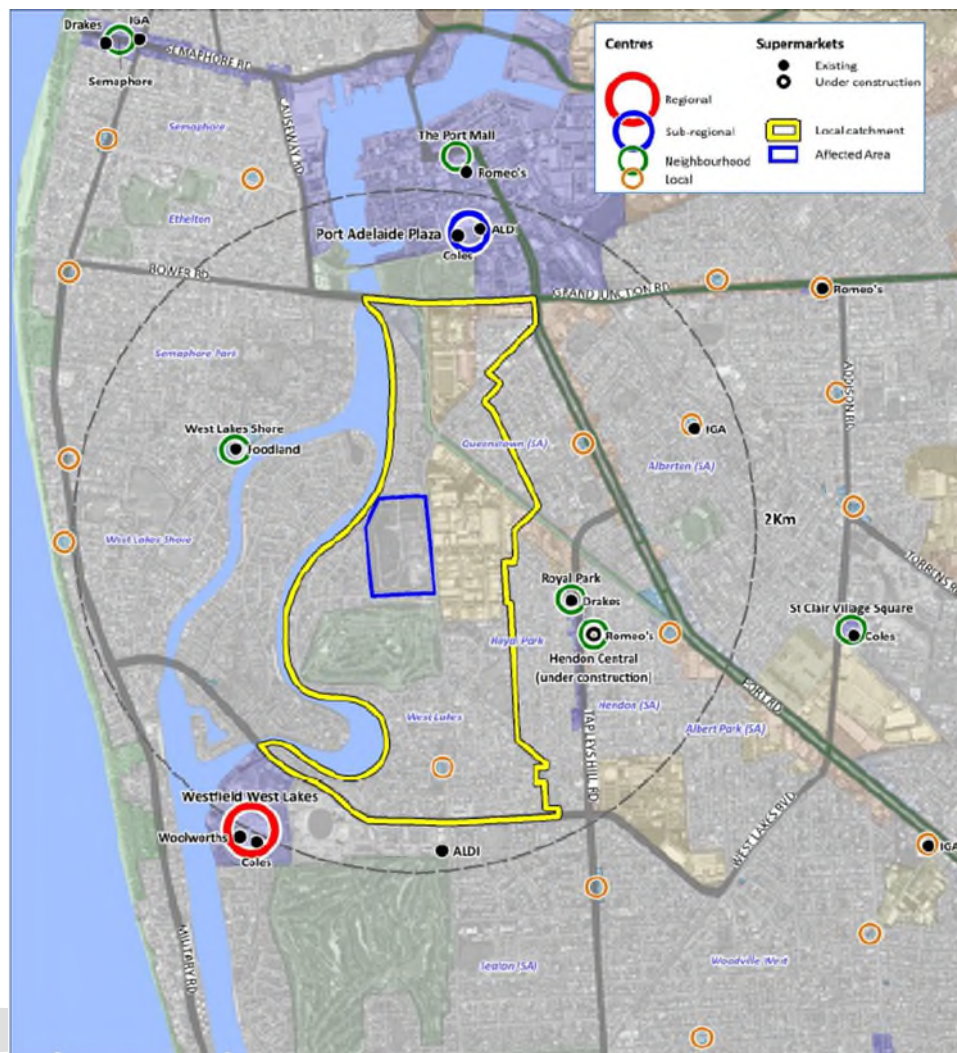
- The local catchment area has experienced steady population growth in the last 5-7 years from about 4,070 in 2016 to 4,280 in 2021;
- Based on the 2016 Census, the area is characterised by:
 - A high proportion of older 'singles' and 'couples without children' which is reflected in the older age profile (23% aged 65+ years);
 - Couples without children (30%) being the largest family type;
 - Many families are long established, evident by the high proportion (68%) living in the same dwelling as 5 years earlier and the high proportion (40%) who fully own their home;
 - A small average household size of just 2.28 persons;
- The demographic profile suggests that the affluent, older population of the area – many already living in townhouses – would be well suited to a future dwelling mix on the Affected Land with a high proportion of townhouses and apartments;
- Based on an average 2.3 persons per dwelling, Deep End have advised that Affected Area could accommodate a future population of 1,290 people (approx.);
- At full development and occupancy of the Affected Area by 2031, the local catchment will be approximately 6,000 people.

The Deep End report also recognised the large employment base in the Royal Park Industrial Precinct which mostly enters and leaves the estate via Schenker Drive, Brandwood Street and Wilson Street, opposite the potential Mixed Use land. This workforce has poor connections to local retailing and should strongly support services developed on the Affected Area.

In relation to retail floor area, Deep End investigations have confirmed that:

- The wider area is well supplied with major supermarkets and other retailing in a range of centres across all levels of the hierarchy (refer to **Figure 4.5** on the following page). The influential centres are:
 - Port Adelaide (Sub- Regional Centre);
 - 'Westfield' West Lakes and emerging 'West' Precinct (Regional Centre);
 - Royal Park/ Hendon (Neighbourhood Centre)
 - ALDI West Lakes (Local Centre)
 - 'Woodlake' Frederick Road (Local Centre)

Figure 4.5 Centres & Supermarkets (Source: Deep End)



Deep End found that the Affected Area catchment is not large enough to support a supermarket between the existing centres and operators, however poses good prospects for a small retail node in conjunction with other commercial uses.

Deep End found that key drivers for a small retail and commercial node on the Frederick Road frontage of the Affected Area are:

- Good visibility and access to 14,800 vehicles per day;
- Favourable demographics, with higher income levels west of Frederick Road and from new residents moving into new dwellings;
- A significant new population on the site increasing the local catchment population by almost one-third; and
- A relatively large workforce within a short drive-time and high levels of passing traffic.

Based on an analysis of surrounding land uses and likely catchment demand, Deep End investigations found that the following aspirational land use mix should be envisaged:

- A shop area of 800-1,000 sqm GLFA indicatively including:
 - Convenience store – 200 sqm;

- 1 x liquor – 120 sqm;
- Pharmacy – 200 sqm (ideally located close to a medical centre on-site);
- 2x Café / lunch bar / bakery – 200 sqm;
- 2 x basic or franchised lunch /evening take away food operators – e.g., Subway;
- pizza, chicken, fish & chips – 200 sqm;
- 1 x hairdresser – 70 sqm;
- Fuel outlet (which may also include on-site food premises);
- Small to mid-sized medical practice with additional allied health consulting rooms (indicative including a range of);
 - Physiotherapy;
 - Psychiatry;
 - Dietician;
 - Podiatry;
 - Audiology;
 - Blood collection;
- Long day childcare centre (LDC) (in the order of 100 places) to service existing and new families in the area, the adjacent industrial area and other workers commuting through the area who may find the site convenient, being either close to home or work; and
- Flexible office or commercial space attractive to small professional services firms, health practitioners, service businesses, NGOs or instructional services /classes such as educational tuition, self-defence, music, fitness, yoga, Pilates or dance classes.

The overall Deep End investigations consider that:

- A Local Centre with up to 1,000 sqm GLFA of shop / retail uses, a gym and other flexible commercial areas (1,000 sqm GLFA) would present a low scale but valuable asset for the local area. A medical centre with potentially other allied health professionals would complement the retail, gym and commercial uses.
- Existing networks and demand analysis show there could be interest in a fuel site, one or more franchised food outlets and a child care centre on the land.
- All uses, if accommodated, could take up to 1.4 hectares of land although some efficiencies could be gained to reduce the land take.
- A small local retail and commercial land use mix on the Affected Area will have a range of positive benefits including:
 - It will provide an active focus and hub for the existing and new residential area and place for the employment zone workers to source food and other daily needs;
 - New and existing residents will access essential retail stores and potentially childcare and medical services by foot. This enhances the efficiency and sustainability credentials of a future development;
 - It will generate up to 155 full and part-time employment opportunities;
 - A significant part of the floorspace will be sustained by the new on-site population; and
 - Improved choice and convenience for residents and better efficiency and serviceability of the centres network in the City of Charles Sturt.

- The retail floor area and other recommended uses on the Affected Area will have little or no overall effect on the large Port Adelaide and West Lakes centres or the smaller nodes on Tapleys Hill Road.

Policy Implications

The proposed adoption of the 'Mixed Use Transition Subzone' with a direct frontage to Frederick Road could facilitate these potential future commercial land uses within the Affected Area.

4.3.4 Desired Urban Form and Densities

The intent of the Code Amendment is to facilitate a low to medium density (low and medium rise) residential land use and supporting services and facilities which may comprise mixed commercial land uses including small scale shops, consulting rooms and offices.

Urban Form

The existing SA Water Re-lift Pump Facility includes infrastructure in the scale similar to a 3 to 4 storey built form, however the vast majority of the Affected Area includes former tanks and open sparsely vegetated land. Refer to **Figure 4.6** on the following page.

Figure 4.6 Existing Infrastructure located on the Affected Area



To facilitate a degree of flexibility and support innovative and adaptable development outcomes, as well as appropriately manage the interface with the surrounding 'Waterfront Neighbourhood Zone' adjoining the Affected Area, incremental building heights are proposed, which will be controlled by both a Technical Numeric Variation (TNV) and a Concept Plan.

In recognition of the interface with existing low-rise built form a maximum building height of 2 building levels and 9 metres is proposed along the northern, southern and western interface. Taller built form (predominantly a maximum of 3 storeys with some four (4) storey built form) is proposed elsewhere within the Affected Area, with a maximum of 5 storeys and 22 metres centrally located and as far as practical from existing residential properties. A maximum building height of three (3) storeys is proposed along the majority of the Frederick Road frontage within the 'Mixed Use Transition Subzone'

The building heights proposed will therefore maintain a low-rise character immediately adjoining the existing Waterfront Neighbourhood Zone and gradually transition to a medium-rise built form central within the Affected Area. The three (3) storey building height along the Frederick Road frontage is similar to existing warehousing located on the eastern side of the road.

The building height transitions envisaged across the Affected Area are depicted in **Figure 4.7** on the following page and in **Attachment C** and **Attachment H**, and include:

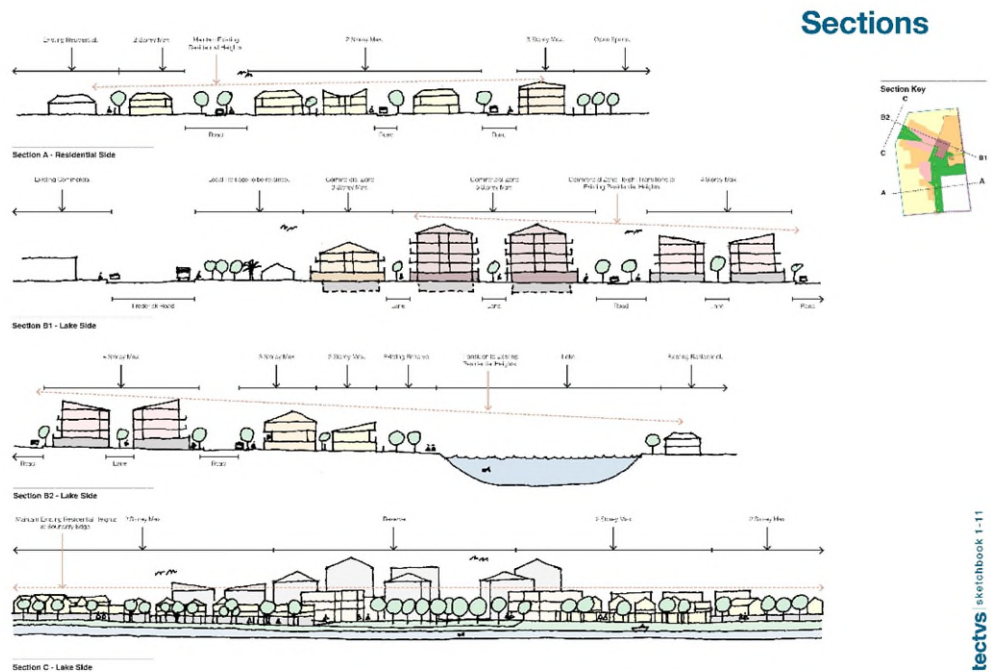
- 2 building levels and 9 metres;
- 3 building levels and 12.5m;
- 4 building levels and 16.5m;and
- 5 building levels and 22m (central within the Affected Area).

The General Development Policies, 'Design in Urban Areas' provisions of the Code will also ensure that future higher built form provides façade articulation and provides visual interest via variation in colour palettes and materiality. Specifically **DO 1 of Design in Urban Areas** seeks that:

DO1 Development is:

- (a) contextual – by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributing to the character of the locality.*
- (b) durable – fit for purpose, adaptable and long lasting.*
- I inclusive– by integrating landscape design to optimise pedestrian and cyclist usability, privacy and equitable access and promoting the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors.*
- (d) sustainable– by integrating sustainable techniques into the design and siting of development and landscaping to improve community health, urban heat, water management, environmental performance, biodiversity and local amenity and to minimise energy consumption.*

Figure 4.7 Future Envisaged Building Height (Indicative Cross-Sections)



Density

A key objective of the draft Code Amendment is to facilitate opportunities for low to medium density residential development, to integrate through a transition of building heights with surrounding residential areas (which comprises low-density, low rise housing) and takes advantage of the Affected Area's location and proximity to the lake edge and areas of public open space.

Part 8 of the Planning and Design Code (Version 2022.9) defines 'low density' as meaning less than 35 dwelling units per hectare and 'medium density' as meaning '35 to 70 dwelling units per hectare.'

Based on an Affected Area of 10.15ha (minus the SA Water Re-lift Pump Facility, indicative public open space and roads), the anticipated dwelling yield of 560 dwelling units over the area would result in a net density of approximately 55 dwelling units per hectare. This would fit within the 'medium density' definition of the Code. This is considered an appropriate outcome and enable a suitable transition from the surrounding low to medium density, low rise Waterfront Neighbourhood Zone to the north, south and west. It will also result in a subtle transition in building height to the 'Strategic Employment Zone' over Frederick Road where existing warehousing and commercial premises are typically two (2) to three (3) storey, in the form of larger pre-cast concrete or Colorbond sheet construction with little visual relief (as depicted in **Figure 4.8** below).

Figure 4.8 Existing Interface – Frederick Road (Source: Tectvs)



Policy Implications

On this basis, and as outlined in Section 2.4.2 above, it is recommended that the draft Code Amendment adopts the following Technical and Numerical Variations Maximum Building Height (Levels) (Maximum building height is 2 levels):

- Maximum Building Height (Metres) (Maximum building height is 9 metres)
- Maximum Building Height (Levels) (Maximum building height is 3 levels)
- Maximum Building Height (Metres) (Maximum building height is 12.5 metres)
- Maximum Building Height (Levels) (Maximum building height is 4 levels)
- Maximum Building Height (Metres) (Maximum building height is 16.5 metres)
- Maximum Building Height (Levels) (Maximum building height is 5 levels)
- Maximum Building Height (Metres) (Maximum building height is 22 metres)
- West Lakes Concept Plan

4.3.5 Flightpath Building Height Limits Investigations

Background

The Airport Building Heights (Regulated) Overlay – All Structures over 110 metres currently applies over the entire Affected Area. This overlay seeks to ensure building height does not pose a hazard to the operation and safety requirements of commercial and military airfields.

Findings

The Urban Design investigations by Tectvs Architects (refer **Attachment H**) indicate a maximum building height of 5 building levels and 22 metres central to the Affected Area. This is reflected within the proposed Concept Plan and Technical Numeric Variations (TNVs) (refer **Attachment C**).

The maximum building height in both levels and metres is therefore well within the Airport Building Heights (Regulated) height limit of 110 metres over the Affected Area. Accordingly, there are no implications from the Code Amendment with respect to Airport Building Heights and informal engagement was not warranted with Adelaide Airport Ltd. A formal referral to both the Civil Aviation Safety Authority (CASA) and Adelaide Airport Ltd will occur as part of the formal consultation process of this Code Amendment.

Policy Implications

Retain the existing Airport Building Heights (Regulated) Overlay – All Structures over 110 metres for the entire Affected Area.

4.3.6 Building Performance and Amenity

The Affected Area currently contains the two (2) buildings comprising the Local Heritage Place (refer to Section 4.3.7) as well as infrastructure associated with the former Waste Water Treatment Plant (WWTP). With exception of the Local Heritage Place, the existing built form has a poor visual amenity and poor streetscape appeal, especially when viewed from Frederick Road and Mariners Reserve.

It is anticipated that future buildings developed in the Affected Area will be designed to a contemporary and high standard to deliver a high level of amenity for internal users, as well as to the wider locality more generally.

In this regard, the South Australian Planning and Design Code (Code) contains several 'General Development Policies' which adopt a best practice approach to the delivery of a high level of building performance. These are primarily contained within the 'Design in Urban Areas' section of the Code.

These policies provide guidance on matters including internal and external building design, visual privacy, building separation and outlook, dwelling configuration, building adaptability, environmental performance, and provision of adequate site facilities and storage. The rezoning will therefore provide a policy framework to enable significant improvement to the visual appearance, streetscape and amenity value of the Affected Area.

'Urban Renewal Neighbourhood Zone', Performance Outcomes PO 3.1 to PO 7.1 include setback provisions from the primary street boundary, secondary street boundary, side boundaries and rear boundaries as follows:

- PO 3.1 Buildings are set back from primary street boundaries to contribute to the existing/emerging pattern of street setbacks in the streetscape and integrate development with public open space.*
- PO 4.1 Buildings are set back from secondary street boundaries to achieve a pattern of separation between building walls and public streets and reinforce a streetscape character.*
- PO 5.1 Dwelling boundary walls are limited in height and length to manage visual and overshadowing impacts on adjoining properties*
- PO 5.2 Dwellings in a semi-detached, row or terrace arrangement maintain space between buildings consistent with a suburban streetscape character.*
- PO 6.1 Buildings are set back from side boundaries to provide:*
- (a) separation between buildings to minimise visual impact*
 - (b) access to natural light and ventilation for neighbours.*
- PO 7.1 Buildings are set back from rear boundaries to provide:*
- (a) separation between dwellings to minimise visual impact*
 - (b) access to natural light and ventilation for neighbours*
 - (c) open space recreational opportunities*
 - (d) space for landscaping and vegetation*

The Zone's policy framework provides a building envelope for future development over the Affected Area. The Zone provides adequate provisions to ensure future development over the Affected Area will have a uniform streetscape appeal and adequate setbacks to mitigate overshadowing, ensure that light and ventilation is provided to dwellings and a high quality, contemporary and visually appealing appearance of built form.

Policy Implications

Urban design matters can be addressed as part of any detailed development proposal. There is sufficient policy coverage addressing these matters within the Planning and Design Code.

4.3.7 Transport Investigations

Background

Stantec were engaged to undertake transport investigations to inform this Code Amendment (refer to **Attachment F**). Stantec's investigations were informed by discussions with both the City of Charles Sturt and Department for Infrastructure and Transport (DIT). Findings of their investigations are summarised in **Table 4.1** below and depicted in **Figure 4.9** on the following pages.

Findings

Table 4.1 *Summary of Transport Investigations*

Area of Investigation	Summary of Investigation Findings
Affected Area Access	<ul style="list-style-type: none">• Frederick Road is a State Maintained Road under the care and control of Department for Infrastructure and Transport (DIT).• Frederick Road comprises dual carriageways which are 7.2 metres wide aligned in a north-south direction and configured with two lanes in each direction separated by a raised central 4.0 metre median. There is a parking lane on the eastern side of the road for a portion of the Affected Area frontage.• Frederick Road has a posted speed limit of 60km/h and carries approximately 14,800 vehicles per day²• Kerbside parking is not permitted along the Frederick Road frontage due to the bicycle lane operating at all times. No other parking controls apply.• A new access road utilising the existing Frederick Road access point could be located approximately 300 metres north of Lochside Drive.• Lochside Drive is a local collector road managed by the City of Charles Sturt and is aligned in an east-west direction forming a T-junction with Frederick Road. Lochside Drive loops around to the west to connect to Frederick Road further to the south as a collector road through this precinct of West Lakes. It is a single carriageway two-way road configured with one lane in each direction. The carriageway width is 9.3 metre (approx.) and is set within a 15.2 metre wide road reserve.• No parking is permitted on both sides of Lochside Drive close to Frederick Road intersection and is unrestricted on both sides to the west.• Lochside Drive has an urban default speed limit of 50km/h and carries approximately 1,500 vehicles per day and 150 and 125 vehicles per hour during the AM and PM peak periods respectively.• It is anticipated there will be a new access road on the southern frontage of the site on Lochside Drive, located

² Department for Infrastructure and Transport traffic data from 2021

	<p>approximately 220 metres west of Frederick Road. SIDRA Modelling has been undertaken on this basis.</p>
External Road Network Impacts	<ul style="list-style-type: none"> • Traffic counts undertaken by Stantec in March 2022 identified that: <ul style="list-style-type: none"> • Traffic flows on Frederick Road were highly platooned (or bunched) with long duration of gaps between platoons. • There was noticeably little traffic between these platoons. • Vehicles from Lochside Drive could turn generally at will unless a platoon of traffic was passing on Frederick Road. • Most traffic to and from Lochside Drive was to and from the north of the intersection. • The intersection operated very efficiently with little queuing observed. • Stantec have undertaken traffic forecasting (contained within Attachment F) based upon the likely anticipated land uses facilitated by the draft Code Amendment. Combined traffic volumes generated (residential and commercial) by the Affected Area would be approximately 9700 (rounded) vehicles per day and 784 & 981 vehicles per hour during the AM and PM peak hours respectively (as depicted in Figure 4.9 below). <p>Note: Stantec's further advice dated 1 August 2022, provided a revised residential peak figure from 435 to 431 peak hour trips resulting in a minor change to 780 & 977 vehicles per hour during the AM and PM peak hours respectively (a difference of 4 peak hour vehicle movements per day).</p> <ul style="list-style-type: none"> • The predicted impact on the adjacent road network will cause an increase in traffic on Lochside Drive and Frederick Road. However, the resultant traffic volumes for each road will remain within the available capacity and the intended function of these roads. • Lochside Drive will increase to approximately 3,100 vehicles per day on its eastern portion to Frederick Road. This will be within the desired traffic volume for a collector road, which typically ranges from 3,000 to 5,000 vehicles per day. • Lochside Drive to the west will have a minor increase, with much of that predicted from local residents (to the west and south) accessing the new mixed uses in the Affected Area through the internal road network. • Frederick Road will increase to around 20,000 vehicles per day to the north and 18,200 vehicles per day to the south, which will remain within capacity for a four lane arterial road which can carry up to 45,000 vehicles per day based on uninterrupted flow (with no significant intersections or limited access) as found along this section

	<p>of Frederick Road between Old Port Road and West Lakes Boulevard.</p> <ul style="list-style-type: none"> • The existing intersection arrangement, including the existing length of right turn lane on Frederick Road, will be suitable to cater for the anticipated traffic volumes from the Affected Area. • Modelling indicates that the existing intersection can continue to operate satisfactorily with the existing traffic control (Stop sign). No changes are recommended. • The existing right turn lane on Frederick Road into Lot 100 of the Affected Area can be utilized, with the length providing suitable storage length. The lane can be brought up to current standards in length if modifications are required. • The location of the anticipated access road intersection in Lot 100 of the Affected Area and Frederick Road will be suitable with offset spacing from adjacent side streets (on the eastern side of Frederick Road) and the existing straight alignment of Frederick Road which provides clear sight distance in each direction. • The anticipated new intersection at Lochside Drive based on a simple T-junction arrangement will operate efficiently, with a Degree of Saturation of less than or equal to 0.12 for both AM and PM peak periods. The location of the access road intersection will be suitable given the existing straight alignment of Lochside Drive which provides clear sight distance in each direction.
Walking and Cycling	<ul style="list-style-type: none"> • A bicycle lane operates on each carriageway of Frederick Road. • Pedestrian paths are located on the southern side of Lochside Drive and the eastern side of Frederick Road. No pedestrian paths exist immediately adjoining the Affected Area. As such the proposed Concept plan shows future verge widening for footpath and streetscaping on both street frontages, with the Future Local Road Widening Overlay also applied over the Affected Area for this purpose. • Pedestrian and cyclist connections would desirably be provided to/from the lake frontage/ Mariners Reserve, through the Affected Area to both Frederick Road and Lochside Drive. An indicative pedestrian/cycle network has been shown on the proposed Concept Plan.
Public Transport	<p>There are no bus services immediately adjacent the Affected Area, with surrounding services (as depicted in Error! Reference source not found.) travelling to and from West Lakes and Port Adelaide interchanges to the south and north respectively.</p> <p>There is a bus stop 500 meters to the south that connects to the Seaton loop bus route.</p>

DRAFT

Figure 4.9 Predicted Traffic Volumes (Daily and Peak Hour)

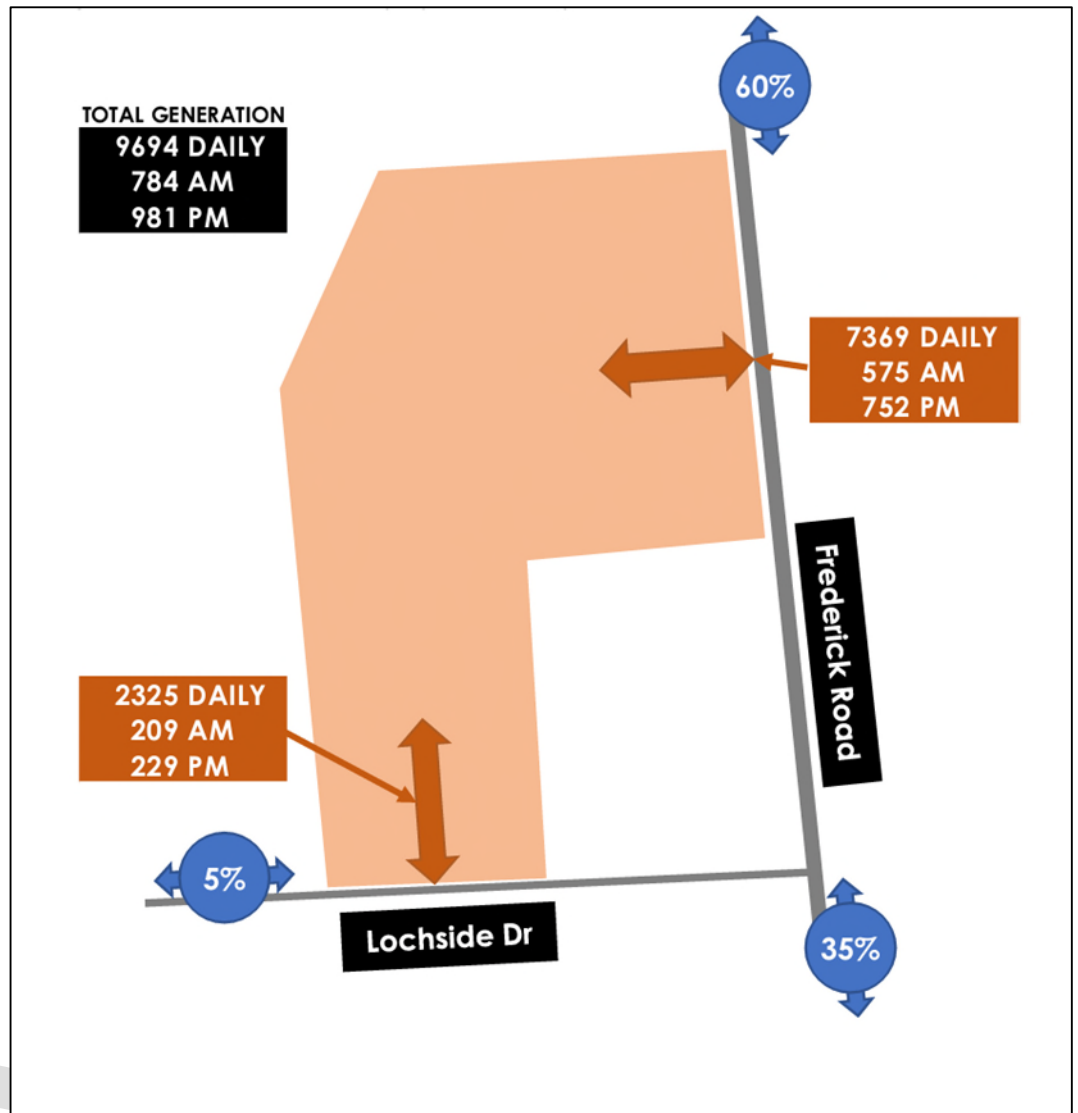
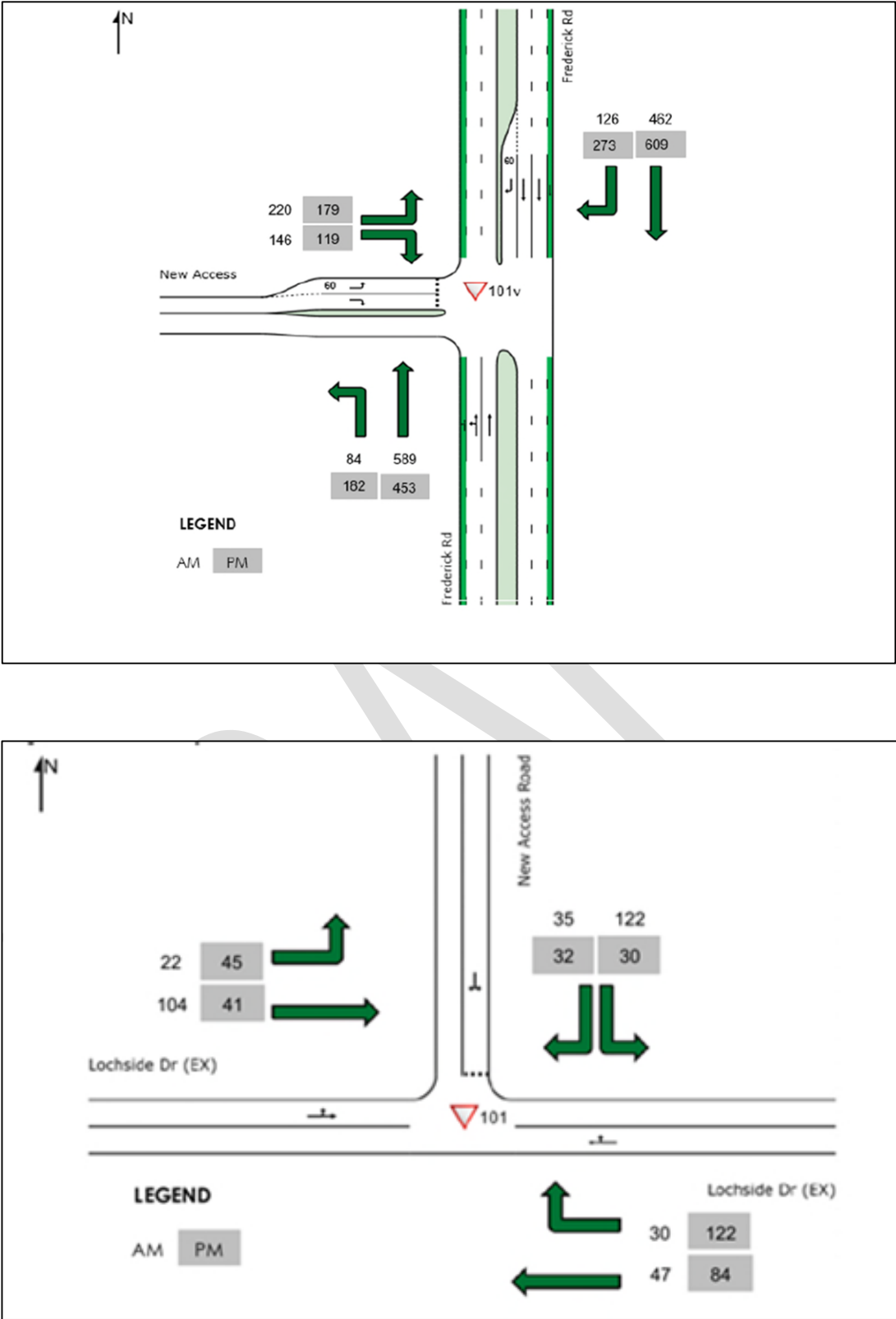


Figure 4.10 Schematic Layout for new intersections from Affected Area (source: Stantec)



Stantec’s review of Planning and Design Code policies relevant to a Neighbourhood-Type Zone with Mixed Use Subzone has not found any specific policies which would be problematic for the anticipated uses in the Affected Area. Given the size and layout of the Affected Area, it is likely that these policies can generally be satisfied with development in the Affected Area.

Policy Implications

Based on the above findings, it is recommended that the proposed Concept Plan includes the location of desired road access points on both Frederick Road and Lochside Drive, as well as pedestrian/cycling linkages through the Affected Area connecting the lake frontage and surrounding street network.

The proposed Concept Plan shows future verge widening for footpath and streetscaping on both street frontages, with the Future Local Road Widening Overlay also applied over the Affected Area for this purpose.

The existing Traffic Generating Development Overlay and Urban Transport Routes Overlay should be retained.

4.3.8 Heritage Assessment

Background

Jason Schulz from DASH Architects has undertaken a Heritage Impact Assessment (refer to **Attachment G**) for the Local Heritage Place located on the Affected Area as depicted in **Figure 4.11** and **Figure 4.12** on the following page.

The 1995 Heritage Survey describes the Local Heritage Place as:

“An imposing and elegant sewage treatment works complex set in a most attractive garden. Consists of a single storey administration building, a large sewage plant building and associated sewage ponds and water treatment area. The two buildings are constructed of red brick walls with rendered quoins, string courses and plinths and are styled in an early 1930’s Inter-Ware Stripped Classical manner with terracotta tiled roofs. The main plant building is the most notable for the high quality of its design and construction and its robust architectural detailing. The extensive garden is also of note, containing remnants of the original garden, including many mature palm trees.”

The extent of the existing Local Heritage Listing is:

“The original form of the administration building, main plant building and the garden area located between the original administration building and Frederick Road for a distance of 90m to the north and south of the original administration building. Excludes sewage points, all other structures and garden areas to the north, south and fronting Frederick Road.”

Figure 4.11 1995 Heritage Survey



Figure 4.12 Local Heritage Place



Findings

The retention of both buildings is consistent with their heritage values, with a review finding the listing of the two buildings as a Local Heritage Place still has merit.

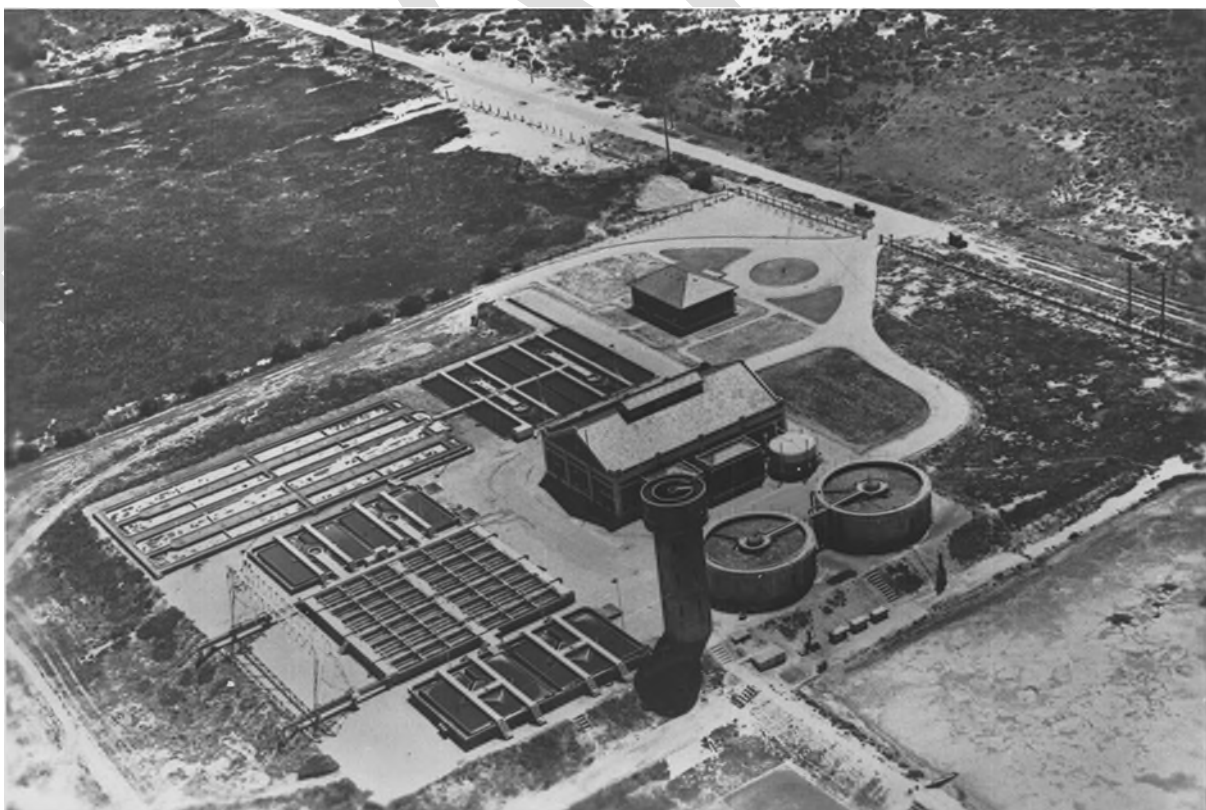
Whilst the Concept Plan shows an indicative roadway running between the two buildings, their spatial relationship will be maintained.

The listing of the gardens is questioned. As depicted in **Figure 4.13** on the following page. This image highlights that the Affected Area was historically located in relatively isolated wetlands. Curated landscapes were neither needed, nor considered necessary at the time of the treatment plant construction. DASH consider that the palms may have been added later (but prior to creating the suburb of West Lakes in the mid to late 1970s) possible to 'beautify' the WWTP as viewed from surrounding land.

While the palms may have aesthetic or landscape value, the heritage investigations do not consider them to have any heritage value associated with the Treatment Works. Nevertheless, the draft Code Amendment does not propose to alter the extent of the listing.

Substantial alteration to the landscaping under the current listing, provided the palms are generally retained may have merit, however would form part of a separate development application at a later date.

Figure 4.13 *Affected Area c1935*



The existing Planning and Design Code Provisions contained within the Local Heritage Place Overlay contain sufficient assessment criteria to ensure that future development over the Affected Area maintains the heritage values of the

Local Heritage Place and ensure that new buildings and structure compliment the heritage values of the Local Heritage Place.

The Heritage Impact Assessment concludes that rezoning of the Affected Area would have a positive impact to the Local Heritage places, as it will enable a wider variety of adaptive land uses for the buildings. Broadening the range of permissible land uses will encourage an economic uplift of the locality and assist in providing conditions that are more likely to support new investment and use of the Local Heritage Places in the Affected Area.

The current Local Heritage Place Overlay extends over both Lot 100 and Lot 101, however the Local Heritage Place and the gardens listed in the description of the Place are located entirely within Lot 100. It appears that the land originally comprised one (1) allotment and was later divided into two (2) in 1997 without modification of the heritage listing. The Heritage Impact Assessment recommends modifying the Local Heritage Overlay to only be applicable to Lot 100, with Heritage Adjacency Overlay to be applied to Lot 101.

The Heritage Impact Assessment concludes that the proposed maximum height limits will not result in development that is at odds with the heritage and cultural values of the Local Heritage Place.

Policy Implications

The existing Local Heritage Place Overlay be retained over Lot 100 and be removed over Lot 101 (which does not contain a Local Heritage Place). The Heritage Adjacency Overlay be applied to Lot 101.

The Code Policy for the Local Heritage Place Overlay and the Heritage Adjacency Overlay contain sufficient policy framework to ensure that future development over the Affected Area remain consistent with the management of the heritage and cultural values of the Local Heritage Place.

The proposed Concept Plan and maximum building height TNVs will not result in development that is at odds with the heritage and cultural values of the Local Heritage Place.

4.3.9 Aboriginal Sites and Objects

Background

A search of the Register of Aboriginal Sites and Objects was undertaken (Refer to **Attachment N**). The search found no entries for known Aboriginal sites or objects over the Affected Area.

Findings

Although the register did not contain any known sites or objects all Aboriginal sites and objects are protected under the *Aboriginal Heritage Act 1988* (the Act), whether they are listed in the central archive or not. Section 20 of the Act requires that any Aboriginal sites, objects or remains, discovered on the land, need to be reported to the Premier. The Department of the Premier and Cabinet - Aboriginal Affairs and Reconciliation as well as the Kaurna Yerta Aboriginal Corporation and the Ramindjeri Heritage Association Incorporated will be formally consulted during the draft Code Amendment engagement process.

Policy Implications

There are no policy implications for the Code Amendment for any known Aboriginal Sites or Objects as part of this draft Code Amendment process.

4.3.10 Open Space

Background

Aspect Studios have undertaken an Open Space investigation (refer to **Attachment H**). The investigation has included an analysis of the Affected Area context, a review of Council's Open Space Strategy, an analysis of the existing open space composition and hierarchy and the Affected Area's opportunities and constraints in order to determine future open space requirements on the Affected Area.

Adjacent to the western boundary of the Affected Area and extending north and south is the water body of West Lakes. The northern portion of the western boundary provides direct lake edge access via Mariners Reserve. The topography of the Affected Area is generally flat with a slight rise in elevation from the lake edge to Frederick Road.

The Affected Area consists of two distinct soil groups. A large portion of the Affected Area contains red brown earth (red brown clay to red brown sandy clay) which was originally grasslands consisting of 'Spear' grass and 'Wallaby' grass. Portions of the Affected Area to the east consist of old dune sand and heavy red brown clay soils.

The City of Charles Sturt *Open Space Strategy* identifies that Precinct E (the Coastline) has a high provision of open space with 220.61ha (7.21ha/1000), this is due to the precinct including open space that has wider regional value.

The Open Space Strategy identifies characteristics of West Lakes, West Lakes Shore and Tennyson as follows:

- Lake has value although limited access to the foreshore;
- There is poor permeability around the streets with cul-de-sacs;
- Lack of street trees; and
- Difficulty accessing beach connections by pedestrians.

The Strategy identified the following open space implications for West Lakes, West Lakes shore and Tennyson:

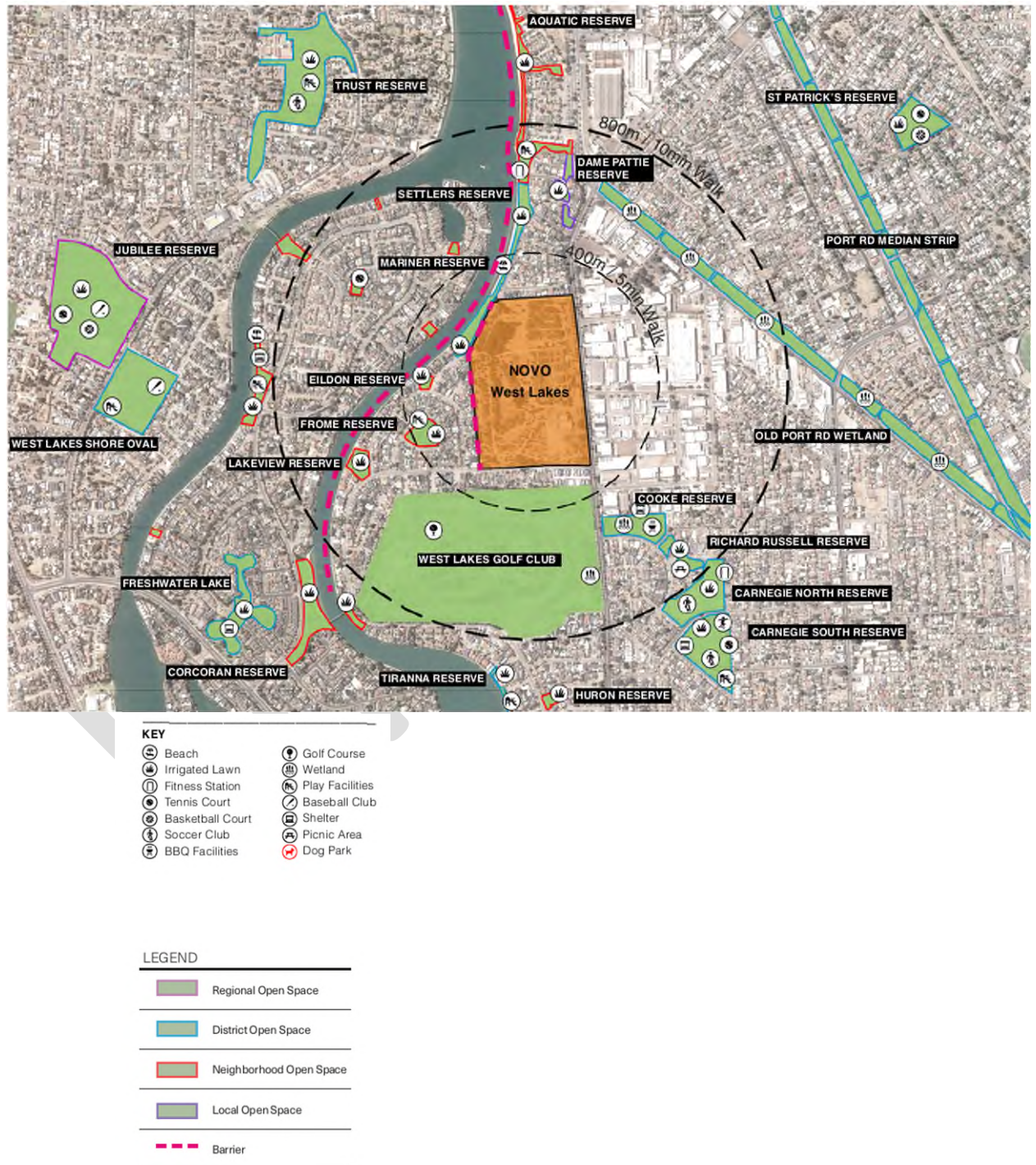
- Need to improve connections; and
- Potential to strengthen the quality and usability of open space.

Findings

The Aspect Studios investigations found that the Affected Area is well placed directly adjacent the West Lakes shore and linear park, providing lake views and opportunities for water recreational activities.

Figure 4.14 on the following page depicts the existing open space distribution within an 800m (or 10 minute walk) of the Affected Area.

Figure 4.14 Existing Open Space Distribution (source: Aspect Studios)



Availability of public open space in the vicinity of this site is impeded by several barriers:

- The State Maintained road - Frederick Road;
- Large tract of privately owned open space - West Lakes Golf Club;
- West Lakes water body; and
- Industrial/commercial precinct to the east.

Existing open space supply within a five-to- ten-minute walk from the centre of the site is restricted to local or neighbourhood reserves. Frome Reserve has a relatively new 'off the shelf' equipment based play space that can be easily accessed from the Affected Area. Carnegie North and South Reserves are approximately one kilometre from the Affected Area to the south and predominantly cater for formal sport such as soccer and are on the other side of Frederick Road making it difficult for young children to access it.

Aspect Studios have identified an opportunity to connect the Affected Area to the water edge through Mariners Reserve. Currently the Reserve consist of scattered planting with a pathway and access steps to the lake. There is a walking path along the lake edge as you walk north which connects to Settlers Reserve. The water edge to the south of Mariners reserve consists of private frontage and the lake access walking route moves away from the water edge cutting through the residential area (refer to **Figure 4.15** on the following page).

Figure 4.15 Lake Access & Link Route (source: Aspect Studios)



Aspect Studios identified that an opportunity exists to extend additional public open space within the Affected Area into the existing Mariners Reserve which is currently underutilized and has little infrastructure apart from a narrow footpath along the lakefront. The footpath comes to a dead end where private ownership of lakefront properties exists. Continuing the path network through the Affected Area will improve linkages through the Affected Area and beyond to future nodes

of activation. The Planning, Development and Infrastructure Act 2016 prescribes a minimum 12.5% of development sites for public open space. The proposed Concept Plan displays an area of approximately 20% of the Affected Area for future public open space which exceeds the legislative requirement.

The investigations recommend that future public open space design within the anticipated development (part of a future development application) should consider the following:

- New play spaces with nature play elements;
- New BBQ and shelter facilities;
- Fitness equipment at stations spaced throughout the Affected Area;
- Linear parks that encourage walkability;
- Opportunities for informal sport such as half court basketball; and
- Dedicated dog park.

Figure 4.16 on the following page depicts an indicative Open Space Master Plan for the Affected Area. This figure is indicative of the likely future lay out and future design of public open space. The final configuration and layout is subject to detailed review and at a future development application stage (subject to authorisation of the draft Code Amendment).

There is also the opportunity for the inclusion of water sensitive urban design (WSUD) in the streetscape and open space to assist with water quality and sustainable design outcomes. The policy framework for Water Sensitive Urban Design is contained within the General Development Policies – ‘Design in Urban Areas’ provisions of the Planning & Design Code.

The Planning and Design Code’s existing General Development Policies – ‘Open Space and Recreation’ provisions provide an adequate policy framework to ensure future areas of public open space meet future residents needs with DO1 seeking:

“Pleasant, functional and accessible open space and recreation facilities are provided at State, regional, district, neighbourhood and local levels for active and passive recreation, biodiversity, community health, urban cooling, tree canopy cover, visual amenity, gathering spaces, wildlife and waterway corridors, and a range of other functions and at a range of sizes that reflect the purpose of that open space.”

Figure 4.16 Indicative Open Space Master Plan (source: Aspect Studios)



Policy Implications

It is recommended to apply the 'Urban Tree Canopy Overlay' over the entirety of the Affected Area. This Overlay seeks that residential development preserves and enhances urban tree canopy through the planting of new trees and retention of existing mature trees where practical and includes a policy framework for tree inclusion during the assessment of future development applications. The overlay is applicable to all Neighbourhood- Type Zones within Greater Metropolitan Adelaide.

Indicative areas of Public Open Space and key pedestrian/cycling linkages through the Affected Area as outlined in the Open Space Master Plan should be spatially depicted on the proposed Concept Plan for the draft Code Amendment.

4.3.11 Services Investigations

Background

FMG engineering have undertaken a preliminary infrastructure assessment (which includes an analysis of stormwater and services investigations) for the Affected Area (refer to **Attachment I**).

The FMG investigations included both a desktop review and engagement with key service authorities to confirm the capacity of existing infrastructure and their ability to service the anticipated future development facilitated by this Code Amendment.

A review by FMG of available LiDAR data suggests localised undulations between 2mAHD and 3.5mAHD exist throughout, however overall site levels trend towards the Lake in the north western corner of the site at roughly 1%. The existing SA Water infrastructure on the south-east corner of the Affected Area is located on a plateau at roughly 5.5mAHD, with existing levels along the north-western boundary at 1.5-2mAHD.

Geotechnically, the Affected Area is quite complex. Reporting prepared by Douglas Partners (Rev 0 – 21 March 2021) outlines varying conditions across the Affected Area, with a typical depth of uncontrolled fill varying from 1m to 2.5m across much of the Affected Area. This coincides in some locations with the groundwater depth which is typically 2.15m-3.37m below the existing surface levels (approximately -0.5mAHD to -1mAHD). The fill layer is typical of the West Lakes region, however somewhat unique to the Affected Area is the presence of a 200-1200mm thick sludge layer within the fill.

Findings

As outlined in **Section 4.2** earlier in this report, existing trunk infrastructure generally has sufficient capacity available to service the anticipated future development over the Affected Area. **Table 4.1** on the following page provides a summary of the infrastructure investigations.

Table 4.1 *Summary of Infrastructure Investigations*

Infrastructure Type	Findings
Potable water (SA Water)	<p>Existing potable water service lines are present along the eastern and southern frontages of Frederick Road and Lochside Drive, consisting of a 200 Cast Iron Concrete Lined (CICL) main, and 150mm AC main on each road respectively. Preliminary consultation with SA Water (refer to Attachment I) revealed that the existing network has sufficient capacity to accommodate the anticipated dwelling unit yield.</p> <p>SA Water have advised that construction of a DN150mm potable water supply within the anticipated new road reserves, and a series of external augmentations would be required, for development within the Affected Area, including;</p> <ul style="list-style-type: none">• Construction of 2 x new DN200/150 branch mains off the Ex.200 CICL main in Frederick Road;• Construction of a new DN150/150 branch main off the Ex.150 AC main in Lochside Drive;• Proposed DN150 internal mains to interlink between Frederick Road and Lochside Drive where possible.• Proposed DN150 branches off Frederick Road will require being dog-legged beneath the Ex.650;• MSCL main on the western side before entering the Affected Area; and• Traditional Housing allotments fronting Lochside Drive will require direct servicing off Ex.150 AC main. <p>The utilisation of smart technologies over the Affected Area is envisaged to add value to the anticipated future community with initiatives including but not limited to:</p> <ul style="list-style-type: none">• Wall mounted smart meters;• Dual Reticulation (potable and recycled water); and• Recycled smart irrigation for public open space.
Sewer (SA Water)	<p>As outlined in Section 4.1.1 preliminary discussion has been held with SA Water (refer to Attachment I) who identified a number of options for servicing anticipated future development over the Affected Area.</p> <p>FMG and SA Water have identified that waste water servicing of the Affected Area requires careful consideration, given the presence of shallow groundwater, proximity to the existing Re-lift Pump Facility and lack of suitable existing gravity sewer to connect the whole of the Affected Area into.</p> <p>Suitable connection solutions include:</p> <ul style="list-style-type: none">• Direct connection into the base of the pump chamber within the lifting station on Lot 101, or

Infrastructure Type	Findings
	<ul style="list-style-type: none"> Connection into the existing rising main in Frederick Road. <p>The preferred method of waste water design and final detail of connections will form part of a future development application.</p>
Electricity	<p>As outlined in Section 4.1.1 existing 11KV high voltage SA Power Networks (SAPN) underground cabling is present along the western verge of Frederick Road and northern verge of Lochside Drive. High voltage power to the full extent of the Lochside Drive and Frederick Road frontages suggests the network will be able to provide sufficient service to anticipated development over the Affected Area.</p> <p>There may be the opportunity for the integration of novel technologies for the generation and harvesting of power (for example solar, hydrogen and associated battery storage of electricity). Whilst details of these initiatives would require negotiation and approval by SAPN, these elements would further increase the viability of the Code Amendment through a reduced reliance on the existing electrical grid network supply if proceeded with. This would form part of a future development application.</p>
Gas	<p>As outlined in Section 4.1.1 the Affected Area is serviced by gas mains along both Frederick Road and Lochside Drive. Future development anticipated over the Affected Area will be able to be serviced by these gas lines, however minor augmentation to potentially connect the 110mm diameter service through to the 63mm main in Frederick Road may be required.</p>
Communications	<p>The area is serviced by the multiple carriers of the 4G network including Telstra, Vocus, Optus and TPG Communications.</p> <p>The NBN is active within the area and has capacity to service the Affected Area. An existing Optus fibre connection to the Affected Area from Frederick Road exists just south of Schenker Drive.</p>

Policy Implications

Both flooding and stormwater management matters can be addressed as part of any detailed development proposal. There is sufficient policy coverage addressing this matter within the Planning and Design Code.

No specific policy on the provision of infrastructure is considered necessary given the suitability of infrastructure to cater for future development on the Affected Area.

The 'Hazards (Flooding – General) Overlay' currently applies over the Affected Area. The overlay seeks to minimise impacts of general flood risk through appropriate siting and design of development. This will continue to apply over the whole of the Affected Area.

Neighbourhood-Type Zones throughout the City of Charles Sturt are also covered by the 'Stormwater Management Overlay'. This Overlay seeks to ensure that development incorporates water sensitive urban design techniques to capture and re-use stormwater. This is therefore proposed to be applied over the portion of the Affected Area to be located within the Urban Renewal Neighbourhood Zone.

4.3.12 Interface (Noise and Odour) Investigations

Background

Noise investigations were undertaken by Resonate (refer to **Attachment J**) that considered the potential impact of noise on the amenity of future residents, as well as the potential for future residents to constrain the existing and future land uses in the vicinity. In particular, the investigations considered:

- Traffic on Frederick Road;
- The existing commercial land uses within the adjoining Strategic Employment Zone;
- The existing function of the SA Water Re-Lift Pump Facility on Lot 101; and
- Potential future noise emanating from the proposed Mixed Use Transition Subzone.

Findings

Resonate undertook noise monitoring of the Affected Area between Thursday 24 March and Thursday 31 March 2022. This monitoring revealed that noise from industrial activities on the eastern side of Frederick Road were not audible at the measurement position located within the 20 metre easement adjoining Frederick Road within the Affected Area.

Previous noise measurements conducted by Resonate on the boundary of the SA Water Re-Lift Pump Facility (Lot 101) indicated that the noise impact from the nearest infrastructure source is negligible compared to road traffic noise. The SA Water Re-Lift Pump Facility underwent an upgrade in 2018 to mitigate both noise and odour emanating from the facility. This upgrade included voluntarily limiting their noise emissions to 40dB(A) or less at the boundary of Lot 100. This is the limit that would have applied if the Affected Area was already developed.

Technically SA Water were (and still are) allowed to generate a higher level of noise at this boundary under the Environment Protection (Noise) Policy, and this limit would reduce to 40-45 dB(A) on rezoning. However, since they have already self-imposed a limit of 40 dB(A) on their operation Resonate are of the opinion that their ability to operate or expand will not be significantly impacted by this Code Amendment.

Resonate concluded that future noise sensitive development within the Affected Area is therefore not anticipated to require any measures to address noise from existing noise sources.

The potential application of the 'Noise and Air Emissions Overlay' was considered by Resonate. The 'Noise and Air Emissions Overlay' contains planning policies to protect new noise and air quality sensitive development from noise and air emissions generated from major transport corridors (road and rail) and mixed land use.

Where a site is within a 'Noise and Air Emissions Overlay' noise attenuation area, this triggers the application of *Ministerial Building Standard MBS 010 - Construction requirements for the control of external sound* for noise sensitive (Class 1, 2, 3, 4 or 9c) buildings. While *MBS 010* applies at the building consent stage, it is also often invoked during the planning stage to demonstrate that a proposed development can meet relevant Planning & Design Code 'Noise and Air Emissions Overlay' provisions.

Based on the noise monitoring undertaken by Resonate, existing road traffic noise levels received at the site are generally low (57dB(A) during the day (7am to 10pm) and 50dB(A) during the night (10pm to 7am) and it is expected that standard facade constructions will result in appropriate internal road traffic noise levels for future noise sensitive developments.

MBS 010 also addresses potential noise impacts arising from mixed land uses. In particular it requires that all facades of noise sensitive land uses within a noise attenuation area and mixed use zone are constructed with acoustic treatment. Potential noise issues associated with noise sensitive development in the 'Mixed Use Transition Subzone' can be appropriately addressed through the relevant General Development Policies, Interface Between Land Uses provisions of the Planning & Design Code, and the Noise EPP as required.

The following Interface between Land Use provisions of the Code will assist in interface management in the 'Mixed Use Transition Subzone' for future development applications:

- DO1: Development is located and designed to mitigate adverse effects on or from neighbouring and proximate land uses.*
- PO 1.1 Sensitive receivers are designed and sited to protect residents and occupants from adverse impacts generated by lawfully existing land uses (or lawfully approved land uses) and land uses desired in the zone.*
- PO 1.2 Development adjacent to a site containing a sensitive receiver (or lawfully approved sensitive receiver) or zone primarily intended to accommodate sensitive receivers is designed to minimise adverse impacts.*
- PO 2.1 Non-residential development does not unreasonably impact the amenity of sensitive receivers (or lawfully approved sensitive receivers) or an adjacent zone primarily for sensitive receivers through its hours of operation having regard to:*
- (a) the nature of the development*
 - (b) measures to mitigate off-site impacts*
 - (c) the extent to which the development is desired in the zone*
 - (d) measures that might be taken in an adjacent zone primarily for sensitive receivers that mitigate adverse impacts without unreasonably compromising the intended use of that land.*

Resonate therefore do not recommend application of a 'Noise and Air Emissions Overlay' noise attenuation area to the Affected Area for the purposes of addressing mixed land use noise issues. The EPA reviewed the Resonate acoustic investigations (refer to **Attachment O** and concurred with their findings.

Background

EnviroScan have undertaken odour modelling over the Affected Area taking into consideration the four (4) EPA licenced premises located within close proximity (refer to **Attachment M**) and found that under normal operations, detectable odour would be restricted to within 50 metres of the four (4) odour emitting sites. The *South Australia Environment Protection (Air Quality) Policy 2016* Schedule 3 specifies the maximum ground level concentration (glc) criterion for odour as 2 odour units (2 OU) for a 3-minute average (99.9%ile) in the metropolitan area. In practise this means that the average person can just detect a 2 OU aroma and probably not identify it. In contrast, a 4 OU smell is distinct and the source can probably be recognised.

Findings

The SA Water biofilter stack odour source (located on Lot 101 of the Affected Area) is within 100m of anticipated future residential development. The EnviroScan investigations found that under normal operation any odour is contained to the Biofilter exhaust stack. The Re-lift Pump facility is subject to ongoing regulation by the EPA (via EPA licence number 51175). Conditions of the licence (refer to **Appendix N**) include the implementation of a site specific Odour Management Plan which is regulated and monitored by the EPA. The EPA have verbally advised that conditions on the licence are strictly monitored and enforced by the EPA. The EPA also verbally advised that the *Environment Protection Act 1993 (the 'EP Act')* contains a legislative framework the require the reporting and expedient mitigation of any detection of odour that exceeds their licence conditions.

Given the modelling and testing undertaken by EnviroScan which demonstrates that under normal operation odour from the SA Water biofilter is limited to within the exhaust stack, the very low likelihood of plant distribution or failure that would result in detectable odour to anticipate future residential properties and the legislative requirements under the EPA Act it is considered that there is sufficient rigor within other legislation and existing systems to mitigate odour.

Further, all forms of dwellings in a future development application would be assessed via the Performance Accessed pathway, in which the General Development Policies, Interface Between Land Uses provisions would apply, which has the following Outcome:

DO1 *Development is located and designed to mitigate adverse effects on or from neighbouring and proximate land uses.*

PO 5.1 *Development with the potential to emit harmful or nuisance-generating air pollution incorporates air pollution control measures to prevent harm to human health or unreasonably impact the amenity of sensitive receivers (or lawfully approved sensitive receivers) within the locality and zones primarily intended to accommodate sensitive receivers.*

It is therefore considered there is sufficient rigor in the General Development Policies and other legislation without the application of the Interface Management Overlay being applied. Preliminary advice from the Planning and Land Use Services Division of the Department for Trade and Investment confirmed that they are "confident that the measures already in place (including management /

legislative requirements under Acts) are adequate to manage noise and odour impacts. Given that there is a very unlikely chance of odour levels reaching unsatisfactory levels, the Code team is satisfied that the Interface Management Overlay is not required in this location.”

Policy Implications

The existing General Development Policies, Interface Between Land Uses provision of the Code provide sufficient assessment framework to ensure that the amenity of future sensitive land uses within the Affected Area are not unreasonably impacted by development within the ‘Mixed Use Transition Subzone’ or adjoining ‘Infrastructure Zone’ and ‘Strategic Employment Zone’.

Application of a ‘Noise and Air Emissions Overlay’ noise attenuation area is not recommended for the Affected Area due to relatively low road traffic noise levels below the threshold requiring any specific facade treatment in accordance with MBS 010.

4.3.13 Interface (Built Form and Land Use Mix) Investigations

Background

A key objective of the draft Code Amendment is to facilitate opportunities for low to medium density, low rise (1-2 storey) and medium rise (3-6 storey) residential development, which will seamlessly integrate with surrounding residential areas (which comprises low-density housing). The opportunity to enhance the Affected Area’s location and proximity to the lake frontage and Mariners Reserve public open space is strongly encouraged.

Investigations have been undertaken in relation to the management of interface areas. In particular, the interface between the Affected Area and adjoining sensitive land uses along the northern, southern and western boundaries. Interface between the proposed ‘Mixed Use Transition Sub Zone’ and sensitive land uses within the balance of the proposed ‘Urban Renewal Neighbourhood Zone’ were also considered.

It is anticipated that future development within the Affected Area will be designed and assessed to ensure an appropriate level of integration and transition with existing and future anticipated built form and land uses, located on adjoining and adjacent land parcels.

While not exhaustively listed herein, it is anticipated this would extend to assessment of matters including:

- The design, character and visual appearance of any building;
- The bulk, scale and visual impact of any building;
- Building heights at street (eye) level;
- Building heights and setbacks in relation to surrounding land; and
- Interface impacts including visual privacy, access to sunlight /overshadowing and acoustic privacy.

Findings

The General Development Policies, particularly ‘Design in Urban Areas’ and ‘Interface Between Land Use’ provisions with the Code provide a sound assessment tool in managing the interface between land use mixes both within

the Affected Area and sensitive land uses surrounding the Affected Area. The following 'Interface Between Land Uses' provisions are considered most relevant in ensuring the suitable interface of future development over the Affected Area:

Interface between land uses

- DO 1 Development is located and designed to mitigate adverse effects on or from neighbouring and proximate land uses.*
- PO 1.1 Sensitive receivers are designed and sited to protect residents and occupants from adverse impacts generated by lawfully existing land uses (or lawfully approved land uses) and land uses desired in the zone.*
- PO 2.1 Non-residential development does not unreasonably impact the amenity of sensitive receivers (or lawfully approved sensitive receivers) or an adjacent zone primarily for sensitive receivers through its hours of operation having regard to:*
- (a) the nature of the development*
 - (b) measures to mitigate off-site impacts the extent to which the development is desired in the zone*
 - (d) measures that might be taken in an adjacent zone primarily for sensitive receivers that mitigate adverse impacts without unreasonably compromising the intended use of that land.*
- PO 3.1 Overshadowing of habitable room windows of adjacent residential land uses in:*
- a. a neighbourhood-type zone is minimised to maintain access to direct winter sunlight*
 - b. other zones is managed to enable access to direct winter sunlight.*
- PO 3.2 Overshadowing of the primary area of private open space or communal open space of adjacent residential land uses in:*
- a. a neighbourhood type zone is minimised to maintain access to direct winter sunlight*
 - b. other zones is managed to enable access to direct winter sunlight*
- PO 3.3 Development does not unduly reduce the generating capacity of adjacent rooftop solar energy facilities taking into account:*
- a. the form of development contemplated in the zone*
 - b. the orientation of the solar energy facilities*
 - c. the extent to which the solar energy facilities are already overshadowed.*
- PO 6.1 External lighting is positioned and designed to not cause unreasonable light spill impact on adjacent sensitive receivers (or lawfully approved sensitive receivers).*

Design in Urban Areas

- PO 10.1 Development mitigates direct overlooking from upper level windows to habitable rooms and private open spaces of adjoining residential uses in neighbourhood-type zones.*
- PO 10.2 Development mitigates direct overlooking from balconies to habitable rooms and private open space of adjoining residential uses in neighbourhood type zones.*

Given the comprehensive nature of the above Code provisions, it is considered that future development within the Affected Area will include appropriate mitigation measures to ensure a high level of residential amenity. As such the application of the 'Interface Management Overlay' is not warranted in this instance.

Further, the Urban Renewal Neighbourhood Zone provides the following Code provisions to ensure the appropriate interface between land uses is achieved:

- PO 1.2 Commercial activities improve community access to services are of a scale and type to maintain residential amenity.*
- PO 1.5 Non-residential development sited and designed to complement the residential character and amenity of the neighbourhood.*
- PO 2.1 Buildings generally 2-3 levels with taller buildings located on sites that are a suitable size and dimension to manage massing and impacts on adjoining residential development.*
- PO 2.2 Buildings on an allotment at the interface with a different neighbourhood-type zone are sited and designed to provide an orderly transition to the built form scale envisaged in that zone to mitigate impacts on adjacent residential uses.*
- PO 6.1 Buildings are set back from side boundaries to provide:*
- (a) separation between buildings to minimise visual impact*
 - (b) access to natural light and ventilation for neighbours.*
- PO 7.1 Buildings are set back from rear boundaries to provide:*
- (a) separation between dwellings to minimise visual impact*
 - (b) access to natural light and ventilation for neighbours*
 - (c) open space recreational opportunities*
 - (d) space for landscaping and vegetation.*
- PO 9.1 Development is compatible with the outcomes sought by any relevant Concept Plan contained within–Part 12 - Concept Plans of the Planning and Design Code to support the orderly development of land through staging of development and provision of infrastructure.*

The Zone provisions above will ensure future development over the Affected Area provides a transition in scale from the adjoining Waterfront Neighbourhood Zone. This transition in scale at the interface will be further reinforced by the adoption of the West Lakes Concept Plan (refer to **Attachment C**).

The proposed Concept Plan TNV spatially applies relevant Maximum Building Heights where development up to two (2) storey is applied adjacent the northern, southern and western interface of the Affected Area with the Waterfront Neighbourhood Zone transitioning to taller built form central to the site and along the Frederick Road frontage. The combined Concept Plan TNV and Maximum Building Height TNVs will ensure the appropriate and gradual transition in building height across the Affected Area.

Future development of the Affected Area will be subject to detailed design, the scale of which will be dictated by market demand and controlled through Code policy. In this regard, development may or may not utilise the maximum building height and dwelling yields anticipated by the rezoning.

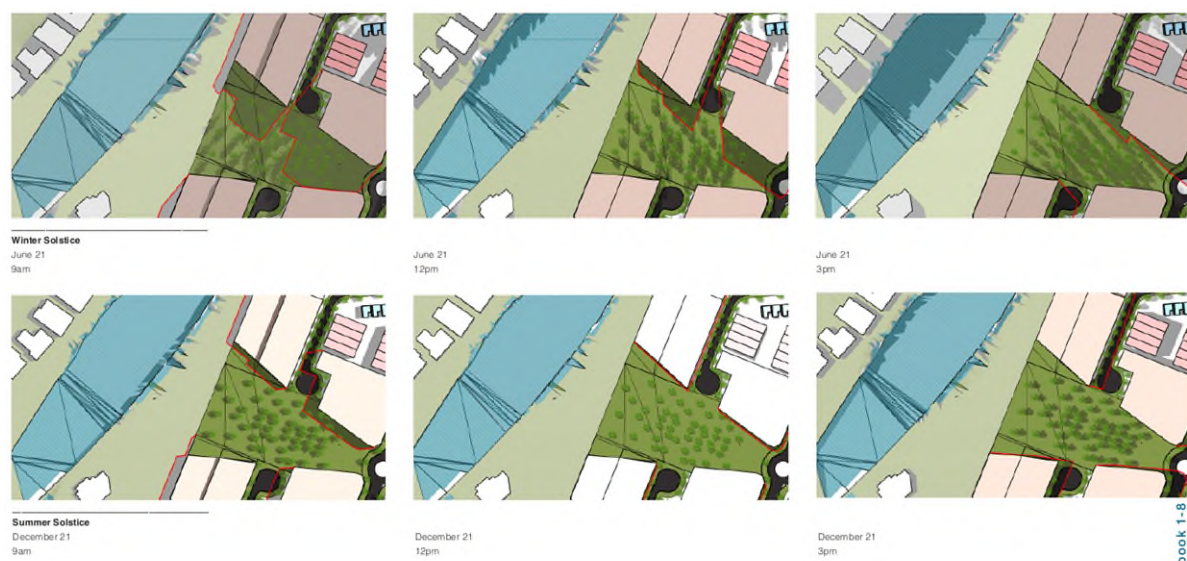
Code provisions within the 'Mixed Use Transition Subzone' further reinforce the importance of careful interface with sensitive land uses, demonstrated by the following provisions:

- DO1 Development accommodating a range of business, commercial, warehousing and light industrial uses enabling the transition of the area to mixed use development, compatible with residential development.*
- PO 1.1 Redevelopment and transition of the area towards mixed development including, residential, supported by a mix of compatible uses including light industry, service trade, motor repair and other compatible businesses servicing the local community that do not produce objectionable emissions.*

The appropriate transition in height provided by the above provisions is visually depicted earlier in the report in **Figure 4.7** under the heading 'Desired Urban Form and Densities.'. This diagram illustrates that indicative-built form will transition in height gradually towards the centre of the Affected Area.

The indicative buildings also demonstrate the possible location of public open space. Given the orientation of adjoining development to the north or over Lochside Drive to the south, adjoining dwellings will not be unduly overshadowed by the height of likely future development (refer to **Figure 4.17** below and **Attachment H**) .

Figure 4.17 Tectvs Indicative Shadow Diagrams (building envelope)



Policy Implications

The 'Urban Renewal Neighbourhood Zone' and 'Mixed Use Transition Subzone' along with the suite of Overlays, TNVs and Concept Plan provide flexibility in the way the Affected Area may be developed in the future, having regard to the context of the locality. The proposed Zone, Subzone and policy framework, including a Concept Pan, can appropriately manage impacts of future development at the interface with the surrounding locality. The investigations confirm that the interface between existing residential land uses and future development of the Affected Area can be appropriately managed.

4.3.14 Preliminary Tree Assessment

Background

In accordance with the agreed Initiation of the Code Amendment by the Minister, investigations of existing vegetation over the Affected Area was undertaken by Arborman Tree Solutions (refer to **Attachment K**) to identify the location and health of any Regulated trees and consideration of applying the Urban Tree Canopy Overlay.

The Affected Area was found to comprise sixteen (16) trees, that were either 'Regulated' or 'Significant' as defined by the *Planning, Development and Infrastructure Act 2016*. of which only one (1) was found to be potentially indigenous to the local area, with five (5) trees identified as being native. Ten (10) of the trees were identified as Canary Island Date Palms (*Phoenix canariensis*).

Findings

The majority of trees were identified as being in Good to Fair overall condition with extended useful life expectancies, however one (1) tree was identified as being dead with no opportunity for remediation.

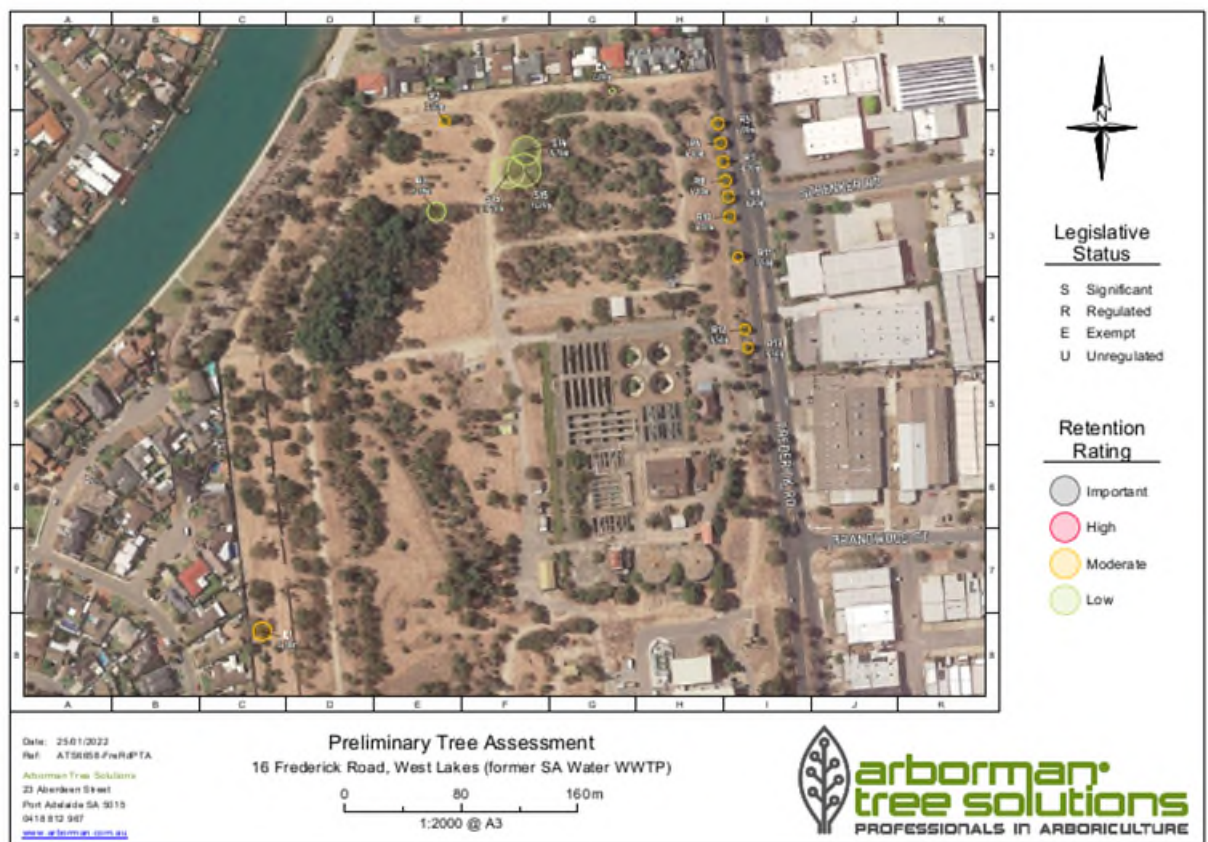
The arboriculture investigation found that of the 16 trees, three (3) were identified as being a 'Significant Tree' as defined by the *Planning, Development and*

Infrastructure Act 2016 (the PDI Act). A further eleven (11) trees were identified as being 'Regulated' with two (2) trees being 'exempt' under the Act.

The investigation found that none of the sixteen (16) trees were considered to provide 'important' aesthetic and/or environmental benefit.

The investigations identified that the nine (9) of the Canary Island Date Palms (*Phoenix canariensis*) are located adjoining Fredrick Road on Lot 100. The remaining trees identified are located on the northern and western periphery of the Affected Area, with a small group of four (4) trees located central to the area as illustrated in **Figure 4.18** on the following page.

Figure 4.18 Location of existing Vegetation



The Planning and Design Code contains policies (Regulated and Significant Trees Overlay) that applies over the Affected Area. The policies include the following Desired Outcome and Performance Objectives:

DO1 Conservation of regulated and significant trees to provide aesthetic and environmental benefits and mitigate tree loss.

PO 1.1 Regulated trees are retained where they:

- (a) make an important visual contribution to local character and amenity.
- (b) are indigenous to the local area and listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.

or

- (c) *provide an important habitat for native fauna.*

PO 1.2 Significant trees are retained where they:

- (a) *make an important contribution to the character or amenity of the local area.*
- (b) *are indigenous to the local area and are listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species.*
- (c) *represent an important habitat for native fauna.*
- (d) *are part of a wildlife corridor of a remnant area of native vegetation.*
- (e) *are important to the maintenance of biodiversity in the local Environment and / or*
- (f) *form a notable visual element to the landscape of the local area*

PO 1.4 A tree-damaging activity in connection with other development satisfies all the following:

- (a) *it accommodates the reasonable development of land in accordance with the relevant zone or subzone where such development might not otherwise be possible*
- (b) *in the case of a significant tree, all reasonable development options and design solutions have been considered to prevent substantial tree-damaging activity occurring.*

Given the majority of the tree's location at the periphery of the site, most trees could possibly be integrated with future development if desired (and dependent on the detailed design of the future development). The policies above will guide the future assessment of a proposed removal of Regulated trees as part of a future development proposal.

On this basis, it is anticipated that the presence of Regulated Trees, will not preclude future development of the Affected Area. Notwithstanding, it is recommended that a suitably qualified Arborist be engaged at the Development Application stage to report on the status of each tree, and to assess the impact of future development on each tree.

It is proposed to incorporate the 'Urban Trees Canopy Overlay' over the entire Affected Area. The Overlay seeks to preserve and enhance urban tree canopy through the planting of new trees and retention of existing mature trees where practicable. The Urban Tree Canopy Overlay is currently applied to all Neighbourhood-type Zones within Greater Metropolitan Adelaide. Given the Code Amendment seeks to apply the 'Urban Renewal Neighbourhood Zone' (a 'Neighbourhood-type Zone' as listed by Part 8 of the Planning and Design Code) the inclusion of the 'Urban Trees Canopy Overlay' over the entire Affected Area is considered appropriate.

The General 'Design in Urban Areas' policies of the Code seek the incorporation of soft landscaping and tree planning as outlined below:

PO 3.1 Soft landscaping and tree planting are incorporated to:

*minimise heat absorption and reflection
maximise shade and shelter
maximise stormwater infiltration
enhance the appearance of land and streetscapes*

PO 13.1 Development facing a street provides a well landscaped area that contains a deep soil space to accommodate a tree of a species and size adequate to provide shade, contribute to tree canopy targets and soften the appearance of buildings.

PO 13.2 Deep soil zones are provided to retain existing vegetation or provide areas that can accommodate new deep root vegetation, including tall trees with large canopies to provide shade and soften the appearance of multi-storey buildings.

PO 13.3 Deep soil zones with access to natural light are provided to assist in maintaining vegetation health.

PO 13.4 Unless separated by a public road or reserve, development sites adjacent to any zone that has a primary purpose of accommodating low-rise residential development incorporate a deep soil zone along the common boundary to enable medium to large trees to be retained or established to assist in screening new buildings of 3 or more building levels in height.

Policy Implications

The arboriculture investigations found that of the 16 trees, three (3) were identified as being a 'Significant Tree' as defined by the *Planning, Development and Infrastructure Act 2016* (the PDI Act). Eleven (11) trees were identified as being 'Regulated' with the two (2) remaining trees being 'exempt' under the Act due to the proximity to existing dwellings or being identified as 'dead'.

There are existing policies in the Planning Design Code under the Regulated and Significant Trees Overlay that can address the future assessment of any proposed removal of a Regulated tree on the Affected Area and therefore no additional policies are proposed.

The 'Urban Tree Canopy Overlay' is proposed to be applied over the 'Urban Renewal Neighbourhood Zone' portion of the Affected Area. The policy framework contained within the Overlay seeks to maximise tree planting and the retention of existing trees.

4.3.15 Environmental Investigations

Background

A Site Contamination Audit has been undertaken for Lot 100 of the Affected Area. The Auditor, Mr Phillip Hitchcock has provided a 'Site Contamination Audit Statement' (SCAS) under section 103Z of the *Environment Protection Act 1993* which contains the summary of the findings of the site contamination audit report (refer to **Attachment L**).

The audit including the development of the Conceptual Site Model (CSM). The CSM includes assumptions and inclusions of all potential sources, pathways and receptors.

The primary potential sources of contamination within the Affected Area are activities associated with the wastewater treatment, sludge lagoons and spread of sludge, chemical storage and imported uncontrolled fill.

The primary potential off-site sources of contamination that could contaminate the Affected Area are known wastewater treatment activities, sludge lagoons, historical petroleum hydrocarbon contamination of groundwater (70 m south at former Council depot on the southern corner of Lochside Drive and Frederick Road) and various industrial activities within the 'Strategic Employment Zone'.

Interim Audit Advice (IAA) has also been provided for the portion of Lot 101 of the Affected Area identified as public open space within the Concept Plan (Refer to **Attachment L**). The IAA identifies the same potentially contaminating activities and constraints as the SCAS area identified above.

Findings

The SCAS found that the former council property has been investigated with a 'Site Contamination Audit Report' (SCAR) (60450) issued in 2015. The original source of the identified groundwater contamination has been removed and a period of groundwater remediation was undertaken. Modelling was undertaken to estimate the future extent of the plume following groundwater remediation. The modelling identified that the concentrations of benzene (considered to be the primary risk driver) in groundwater would reduce to below 0.3 mg/L within 75 m down-gradient of the source area after 50 years. Annual groundwater monitoring is required as a condition of the Council depot audit.

Recently reported concentrations indicated a downward trend in most locations, with no exceedance of trigger levels. Based on the outcomes of the Council depot investigation and SCAR it is considered unlikely it would pose an unacceptable risk to groundwater beneath the Audit Site.

Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) contamination has been identified within groundwater on and off site in the West Lakes area. Discussions with the EPA (and as noted in the SA EPA's Blue Book) identified that there are to be no new groundwater wells installed in the West Lakes area beyond those directly associated with contamination management (i.e. investigation/remediation).

Investigations undertaken by the SA EPA, as documented on their website, have concluded recreational use of the lake does not pose a risk.

Following the site investigation works, the audit found that the main contaminants of concern were refined to:

- Arsenic, cadmium, lead, nickel, zinc, dioxins & furans, TRH and PFAS – in soil;
- PFAS, metals, nutrients – in groundwater;
- PFAS, nutrients and metals – in surface water; and
- Nutrients and metals – in bore water.

Derivation of soil site-specific criteria for metals of concern was undertaken with a minimum 300 mm clean soil layer. Following comparison with these criteria, the audit found that no exceedances of human health criteria remain at the Affected Area within fill, sludge or natural soils.

Some elevated Total Recoverable Hydrocarbons (TRH) concentrations were found to exist (primarily within sludge material) with respect to direct contact for residents, however these will be mitigated via the capping conditioned as part of the Audit Report. Direct contact exceedances for maintenance workers will be managed via the construction environment management plan (CEMP) for any future development which is also a condition of the Audit Report.

The proposed use of the Affected Area is anticipated to be residential with areas of mixed use and considered to represent the more conservative category of ASC NEPM HIL A use which is defined as 'sensitive use – residential with garden/accessible soil (home-grown produce <10% fruit and vegetable intake, no poultry), also includes children's day care centres, preschools and primary schools, ASC NEPM HIL A.'

The auditor has concluded that:

"No active remediation is considered to be required for the Affected Area based on low density residential and other mixed land use.

That site contamination of soil does exist at the Affected Area for a low density residential land use (HIL A). This is to be managed in the pre-construction phase of the development by the placement of shallow clean fill.

That site contamination of groundwater does exist at the Affected Area due to elevated concentrations of PFAS compounds, dioxins and furans, arsenic, cadmium, copper, nickel, zinc, un-ionised ammonia, total nitrogen and phosphorous in groundwater which are above the adopted assessment criteria, however the EPA has conducted community consultation to advise no extraction.

As the groundwater contamination is partially site-derived, off-site investigation has been undertaken as part of the Audit. The Auditor concludes that contamination of off-site surface water and bore water does also exist and that the nature and extent of this has been defined.

Site contamination of soil vapour does not exist at the Affected Area.

There is no actual or potential risk to human or environmental receptors for the Affected Area for the proposed land use."

The Auditor has determined that the Affected Area is suitable for the following sensitive uses or another use or range of uses, subject to the conditions on land and groundwater:

- a. Sensitive use – residential with garden/accessible soil (home grown produce <10% fruit and vegetable intake, no poultry).
- b. Sensitive use – residential with minimal opportunities for soil access; includes dwellings with fully and permanently paved yard space such as high-rise buildings and apartments.
- c. Sensitive use – childcare centres, kindergartens, preschools and primary schools.

- d. Public open space such as parks, playgrounds, playing fields (e.g. ovals), secondary schools and footpaths.
- e. Commercial use such as shops, offices, consulting rooms, petrol filling stations and warehouses.
- f. Industrial use such as light, service, general or special industry.

Within the IAA, the Auditor has advised that approximately 60% of the site is underlain by sludge. The combination of capping impacted soils and the proposed development (road, walking paths and landscaping) will minimise infiltration. Minimising infiltration will reduce leaching of contaminants of concern from the fill and underlying sludge material and will reduce the future impact to groundwater directly below the Site. It is proposed that capping works will be completed during each stage of development as governed by the Construction Environmental Management Plan (CEMP).

Policy Implications

The Site Contamination Audit will be noted on the Affected Area's Certificates of Title. The Site Contamination Audit has deemed the Affected Area suitable for the sensitive land uses which are anticipated as part of this proposed rezoning.

The *Planning, Development and Infrastructure Act 2016* and supporting *Regulations 2017* provide sufficient rigour to ensure contamination is appropriately addressed as part of a future development application stage.

The Planning and Design Code's Site Contamination General Development Policies provide suitable policy support for relevant authorities in ensuring this matter is addressed for sensitive land uses.

4.3.16 Affordable Housing

Background

State Planning Policy 6.8 seeks to ensure "*that a minimum 15% of new housing in all significant developments that meets the criteria for affordable housing.*" The Affected Area is currently located within the 'Strategic Employment Zone' in which residential development was not expressly envisaged.

Affordable Housing under the Planning and Design Code "*means housing that meets the relevant criteria for 'affordable housing' as determined by the Minister responsible for the South Australian Housing Trust Act 1995 under Regulation 4 of the South Australian Housing Trust Regulations 2010.*"

Affordable housing is designed and priced to cost people no more than 30% of their gross income if they are on a low or moderate income. A dwelling is considered to be an affordable home if it is:

- Offered for sale to eligible buyers
- Offered for home ownership and is for sale at or below the appropriate price point
- Priced at \$367,000 or less (if key criteria are met, the price can be up to \$422,050 - the criteria are published in the government gazette).

Findings

This Code Amendment seeks to apply the 'Urban Renewal Neighbourhood Zone' over the Affected Area in order to accommodate low to medium density residential development. In order to ensure that future development incorporate Affordable Housing,

it is recommended that the 'Affordable Housing Overlay' be applied over the Affected Area. The Affordable Housing Overlay has the following Outcomes:

DO1: Affordable housing is integrated with residential and mixed use development

DO2: Affordable housing caters for a variety of household structures

PO 1.1 Development comprising 20 or more dwellings / allotments incorporates affordable housing.

The Affordable Housing Overlay under DTS/DPF 1.2 seeks that development comprising 20 or more dwellings/or residential allotments includes a minimum of 15% affordable housing. This will be assessed as part of a future land division application. The Affordable Housing Overlay also triggers a mandatory referral to Minister responsible for administering the *South Australian Housing Trust Act 1995* (via the SA Housing Authority).

Policy Implications

There are sufficient policies contained in the Affordable Housing Overlay of the Planning and Design Code to ensure that future development provides a minimum of 15% affordable housing.

4.3.17 Waste Management

Managing waste in a low to medium density infill residential and mixed-use development scenario is an important consideration, to ensure that efficient, convenient and sustainable practices are employed. While the final form of development for the Affected Area will be determined as part of a future development proposal, it is important that future waste management solutions are practical and affordable, and designed to appropriately manage waste, encourage greater recovery of resources and enhance the quality of life for the community.

There are a number of resources available to assist developers on this issue (for example, the Government of South Australia's 2014 Guide '*Better Practice Guide: Waste Management for Residential and Mixed Use Developments*', the City of Charles Sturt *Residential Waste and Recycling Policy* as well as specialised 'Waste Management' consultants available to assist future development proponents at the design phase of a development proposal). Further, the Planning and Design Code contains a number of specific policies in relation to the management of waste and recycling.

For example, the following existing General Development Policies of the Code provide significant guidance and can be applied at the development Application stage:

- Design in Urban Areas: PO 1.5, 11.1, 11.2, 11.3, 11.4, 11.5

Policy Implications

There are sufficient policies contained in the Planning and Design Code to assess future proposals on the management of waste and recycling.

Given the large scale of the Affected Area, there is considered sufficient available area to adequately accommodate typical waste vehicle movements that would comply with the City of Charles Sturt *Residential Waste and Recycling Policy*. Detailed design and analysis of waste collection which will form part of future development applications.

4.3.18 Recommended policy changes

The scope of the Code Amendment does not include the creation of new planning policy, and is limited to the spatial application of Zones, Subzones and Overlays or TNVs provided for under the published Planning and Design Code. The changes to the spatial application of the Zones, Subzones and Overlays and TNVs are described in **Section 2.4.2** of this report.

Notwithstanding, the above investigations confirm that the policy contained within the Planning and Design Code is adequate to guide future development of the Affected Area.

Following is a list of the recommended policy changes which are proposed in response to the investigations undertaken in support of this Code Amendment:

Proposed Code Policy	<p>Zone</p> <ul style="list-style-type: none">• Urban Renewal Neighbourhood Zone• Mixed Use Transition Subzone• Infrastructure Zone <p>Overlays</p> <p>It is recommended to retain all existing Overlays over the Affected Area and incorporate the following additional Overlays over the portion of the Affected Area in the Urban Renewal Neighbourhood Zone:</p> <ul style="list-style-type: none">• Affordable Housing Overlay• Stormwater Management Overlay• Urban Tree Canopy Overlay• Heritage Adjacency Overlay• Future Local Road Widening Overlay <p>Local Variation (TNV)</p> <ul style="list-style-type: none">• Maximum Building Height (Levels) – 2 levels• Maximum Building Height (Metres) – 9 metres• Maximum Building Height (Levels) – 3 levels• Maximum Building Height (Metres) – 12.5 metres• Maximum Building Height (Levels) – 4 levels• Maximum Building Height (Metres) – 16.5 metres• Maximum Building Height (Levels) – 5 Levels• Maximum Building Height (Metres) – 22 metres• Concept Plan – West Lakes
-----------------------------	--

5. REFERENCES

- Arborman Tree Solutions, July 2022, Preliminary Tree Assessment;
- Aspect Studios, July 2022, Urban Open Space analysis;
- Australian Environmental Auditors Pty Ltd, May 2022, Site Contamination Audit Statement;
- City of Charles Sturt, 2014, Living Green to 2020 Refresh;
- City of Charles Sturt, August 2015, Open Space Strategy 2025- Background Report;
- City of Charles Sturt, 2020, draft Your Neighbourhood Plan;
- City of Charles Sturt, 2020, 'Our Community Plan' 2020-2027
- Deep End Services, July 2022, West Lakes Residential & Mixed Use Code Amendment;
- Department of Planning, Transport and Infrastructure, 2017, The 30-Year Plan for Greater Adelaide, 2017 Update;
- FMG, July 2022, Preliminary Infrastructure Assessment, 16 Frederick Road, West Lakes;
- Government of South Australia, Attorney-General's Department – Land Supply Report for Greater Adelaide;
- Resonate, July 2022, 16 Frederick Road Wests Lakes Environmental Noise Assessment;
- Stantec, July 2022 West Lakes Residential and Mixed Use Code Amendment, Lot 100 & 101 Frederick Road Transport Impact Assessment;
- State Planning Commission, 2019, State Planning Policies;
- State Planning Commission, 2019, People and Neighbourhoods Policy Discussion Paper; and
- Tectvs, July 2022, Built Form analysis- West Lakes.

ATTACHMENT A – AFFECTED AREA MAPPING AND CURRENT CODE POLICY

The Affected Area is currently zoned 'Infrastructure Zone' as illustrated in **Figure 5.1** below.

Figure 5.1 Existing Zoning



The following Overlays and Technical Numeric Variations (TNV's) currently apply to the Affected Area:

Overlays

- Airport Building Height (Regulated) (All structures over 110 metres)
- Local Heritage Place
- Traffic Generating Development
- Urban Transport Routes
- Hazards (Flooding General)
- Regulated and Significant Trees
- Prescribed Wells Area
- Water Resources

Technical Numeric Variations (TNV's)

No TNVs currently apply over the Affected Area.

ATTACHMENT B – CURRENT CODE POLICY MAPS

Figure 5.2 Existing Airport Building Heights (Regulated) Overlay



Figure 5.3 Existing Regulated and Significant Tree Overlay



Figure 5.4 Existing Prescribed Wells Area Overlay

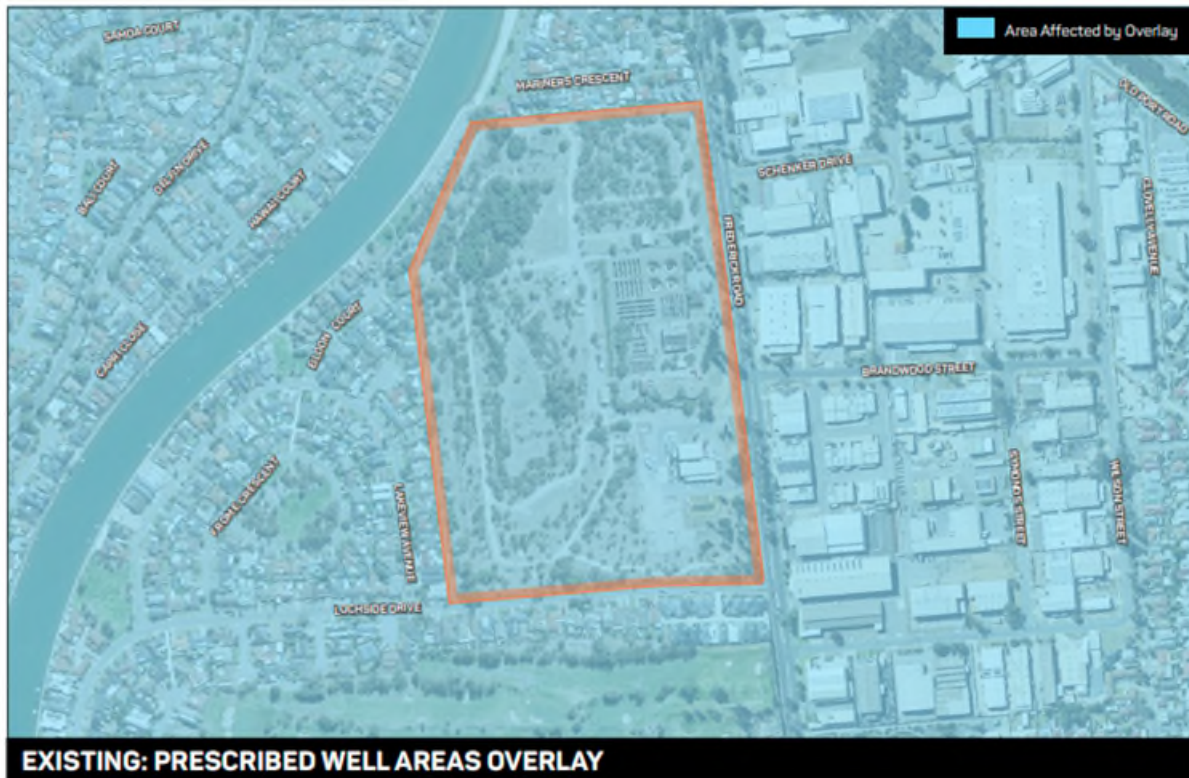


Figure 5.5 Existing Hazards (Flooding – General) Overlay

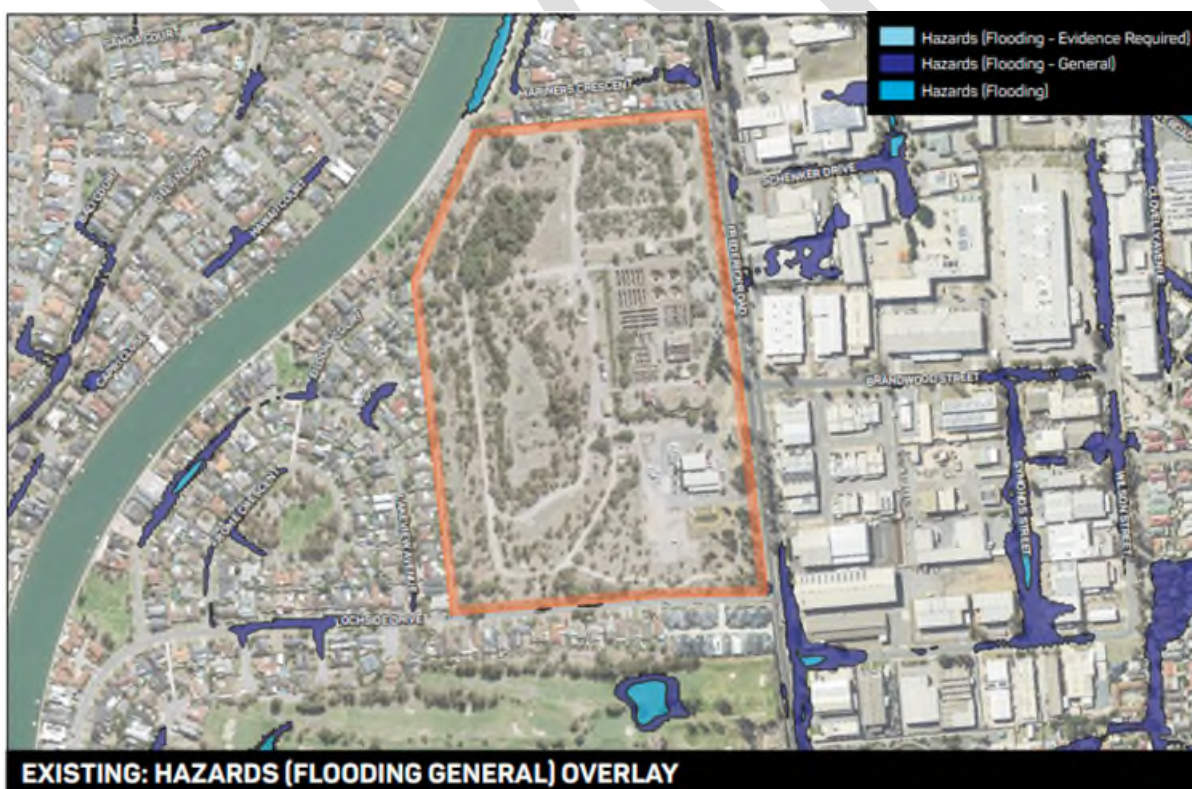


Figure 5.6 Existing Local Heritage Place Overlay

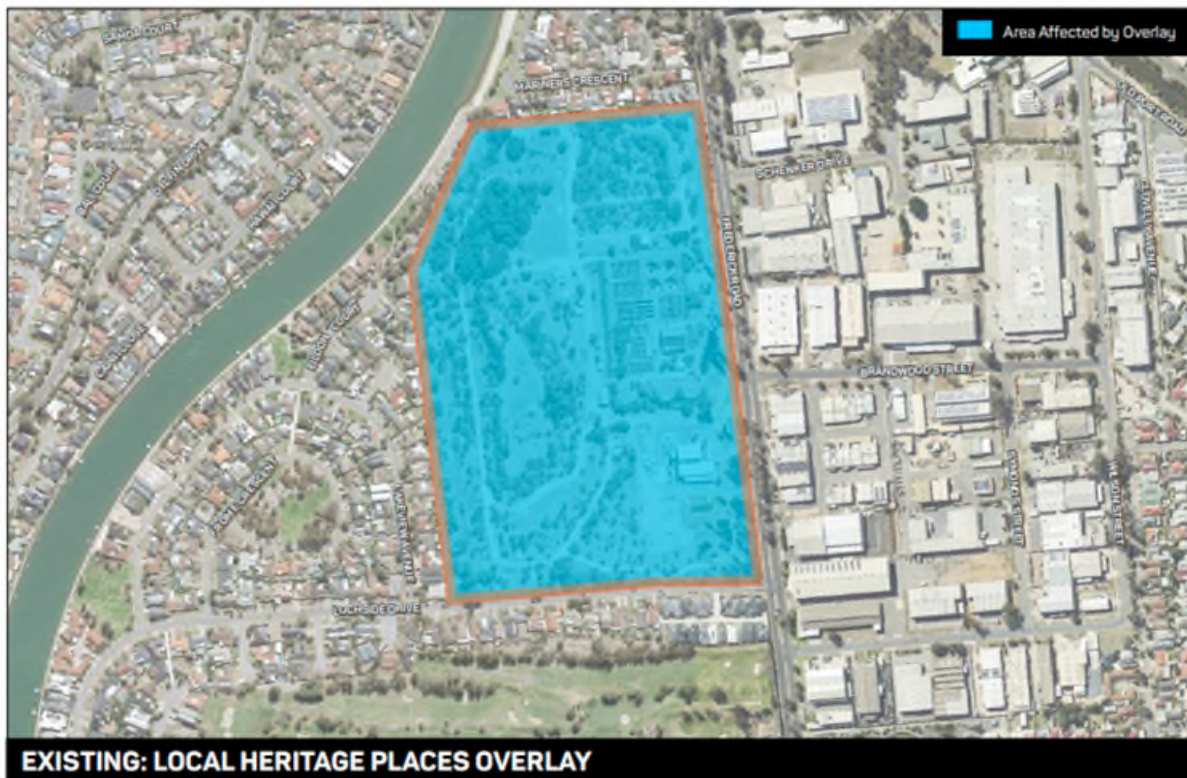


Figure 5.7 Existing Traffic Generating Development Overlay

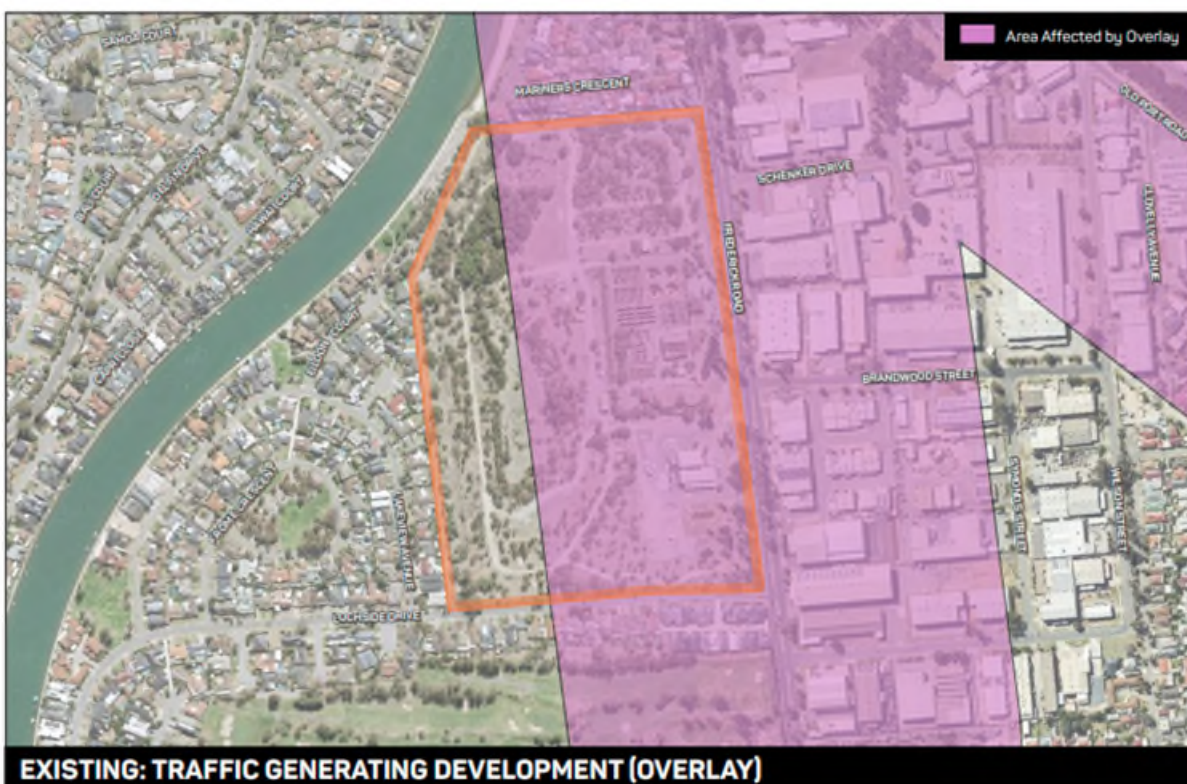


Figure 5.8 Existing Urban Transport Routes Overlay

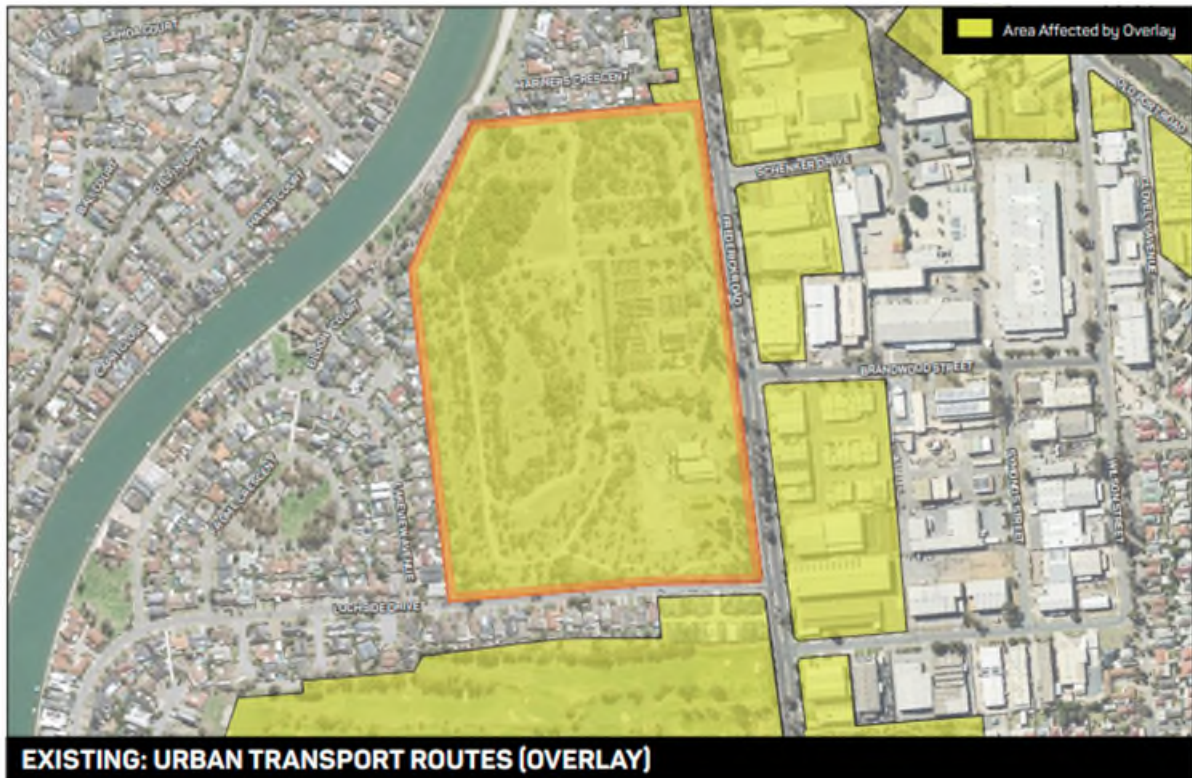


Figure 5.9 Existing Water Resources Overlay



Figure 5.10 Existing Affordable Housing Overlay



Figure 5.11 Existing Urban Tree Canopy Overlay

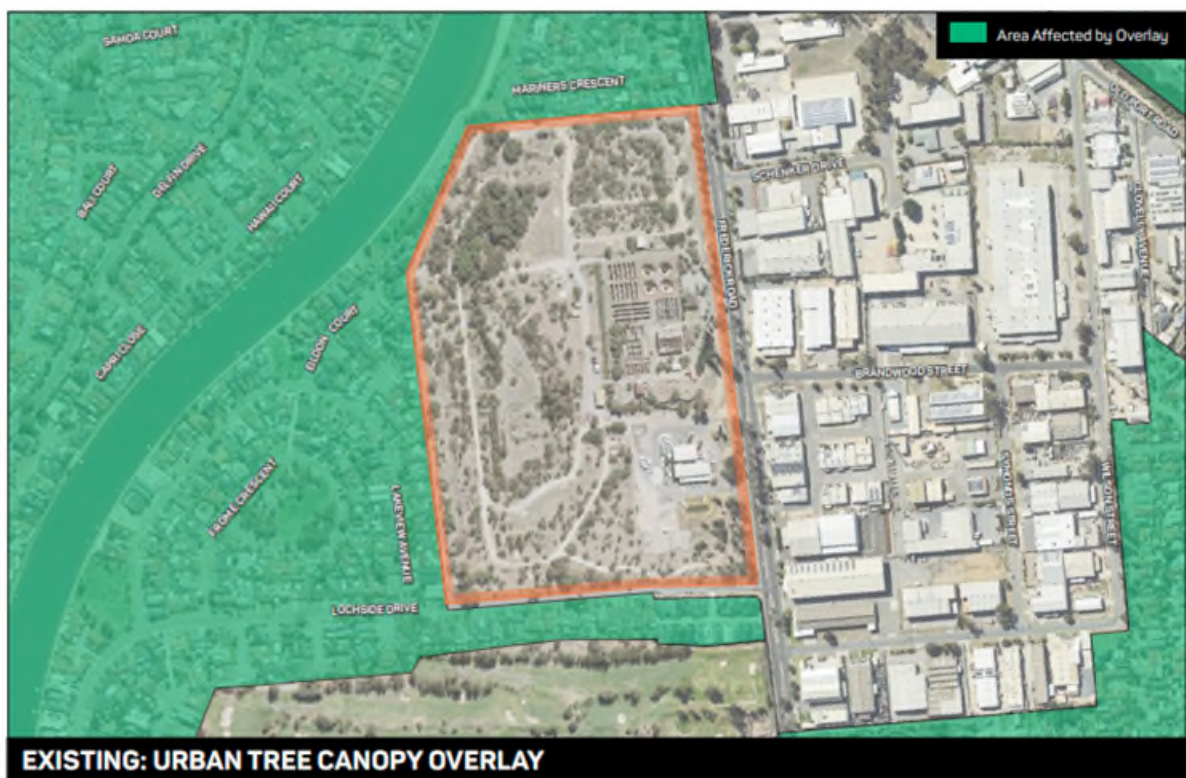
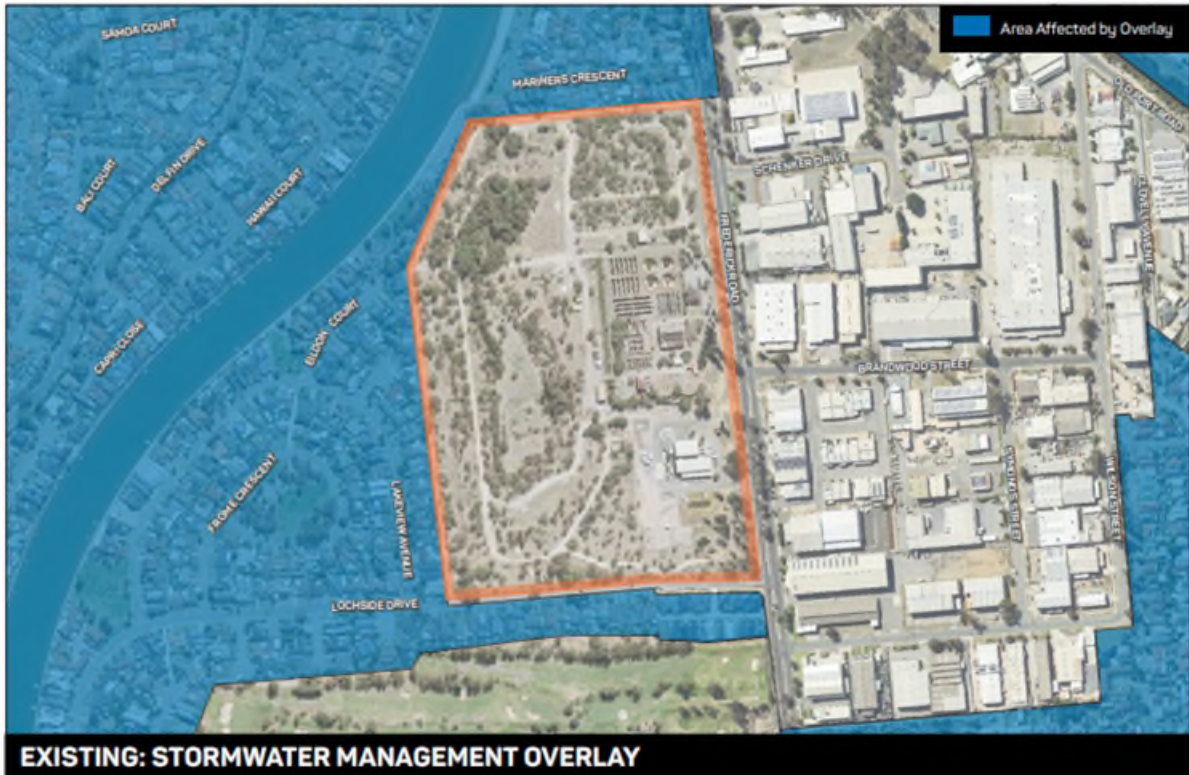


Figure 5.12 Existing Stormwater Management Overlay



ATTACHMENT C – PROPOSED CODE POLICY

It is proposed to zone a portion of the Affected Area 'Urban Renewal Neighbourhood Zone' with the north-eastern portion of the Affected Area to be Zoned 'Mixed Use Transition Subzone.' The south-eastern corner of the Affected Area comprising the existing SA Water Re-Lift Pump Facility is to remain in the Infrastructure Zone as depicted in **Figure 5.13** and **Figure 5.14** below.

It is proposed to maintain all of the existing Overlays that currently apply over the Affected Area as well as introduce those applicable to the neighbourhood suite of zones. It is proposed to introduce the 'Affordable Housing Overlay', 'Future Local Road Widening Overlay', 'Heritage Adjacency Overlay', 'Stormwater Management Overlay' and the 'Urban Tree Canopy Overlay' over the 'Urban Neighbourhood Zone' portion of the Affected Area.

Overlays

- Airport Building Height (Regulated)
(All structures over 110 metres)
- Affordable Housing
- Future Local Road Widening
- Hazards (Flooding General)
- Prescribed Wells Area
- Regulated and Significant Tree
- Water Resources
- Traffic Generating Development
- Stormwater Management
- Heritage Adjacency
- Urban Transport Routes
- Urban Tree Canopy

Figure 5.13 *Proposed Zoning*



Figure 5.14 *Proposed Sub-Zone*



Figure 5.15 *Proposed Local Heritage Places Overlay*

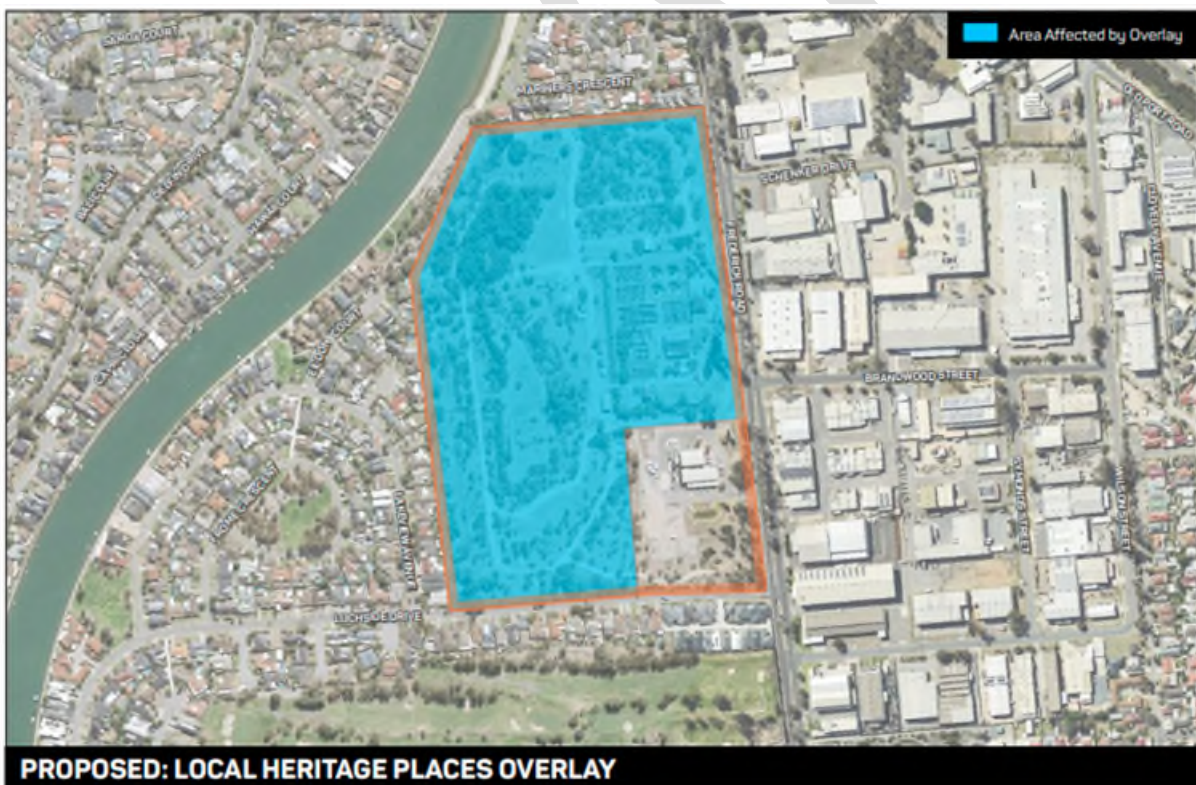


Figure 5.16 *Proposed Heritage Adjacency Overlay*

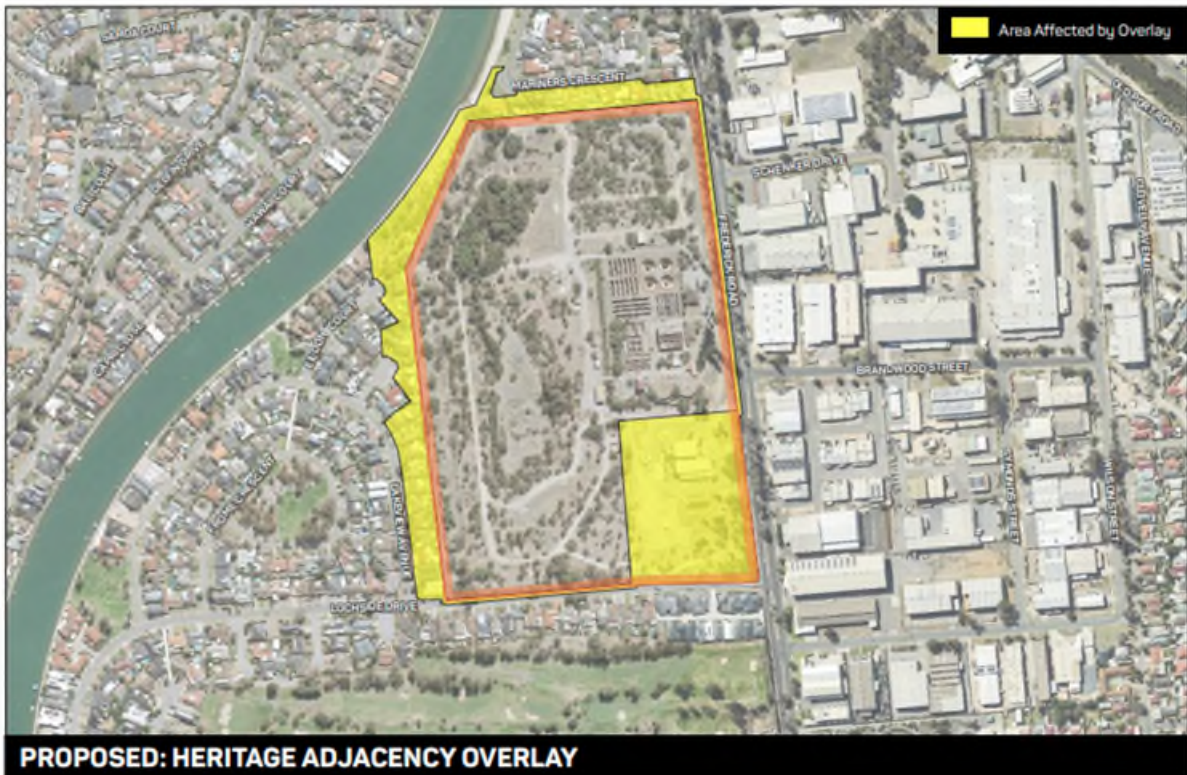


Figure 5.17 *Proposed Affordable Housing Overlay*

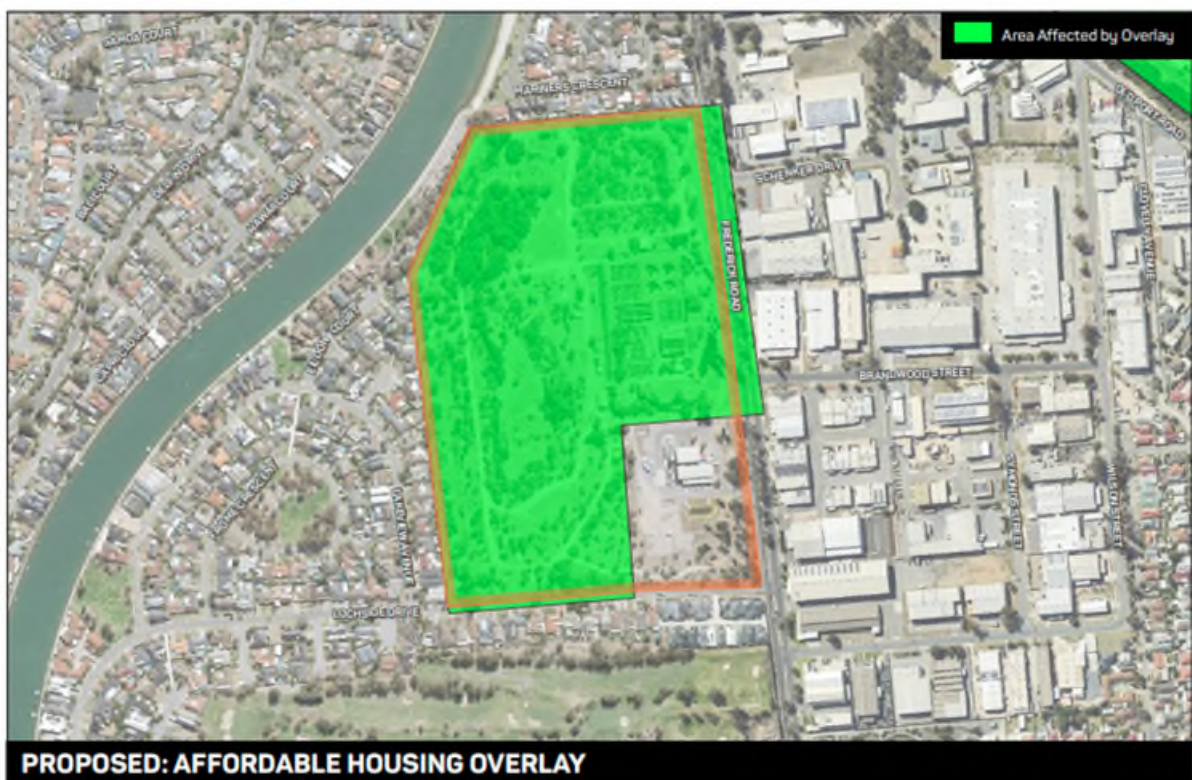


Figure 5.18 *Proposed Urban Tree Canopy Overlay*

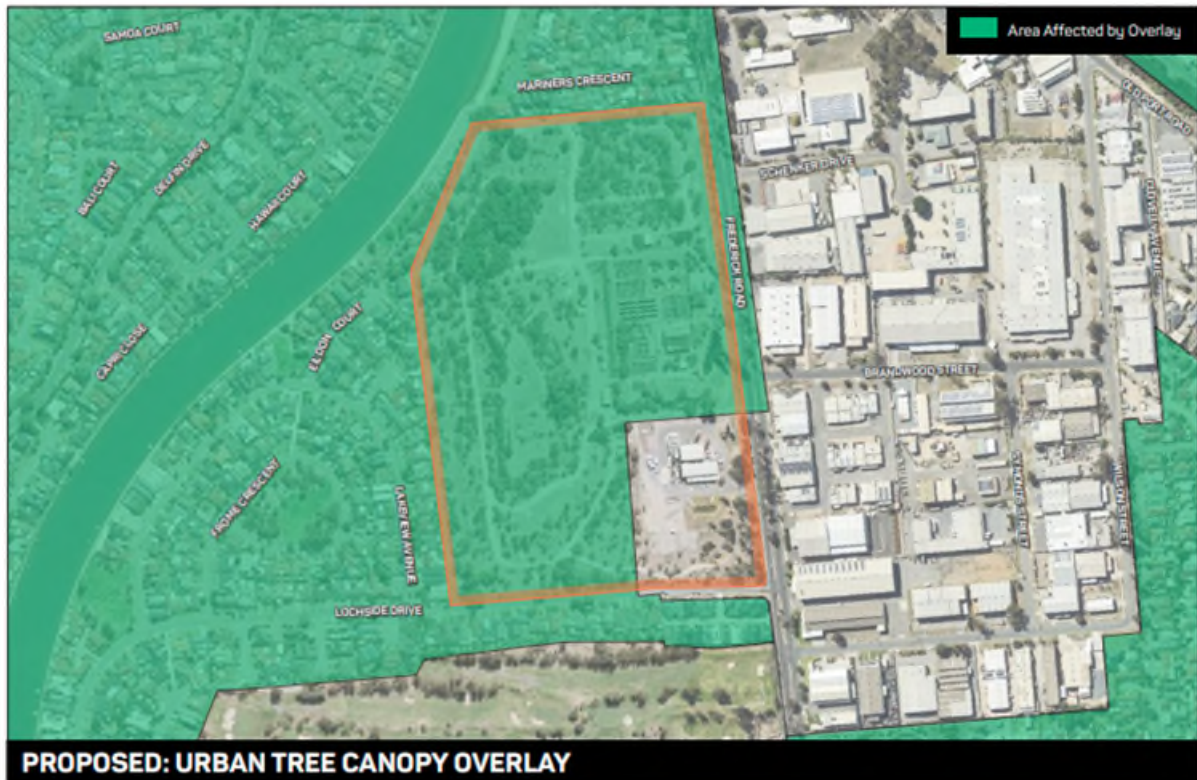
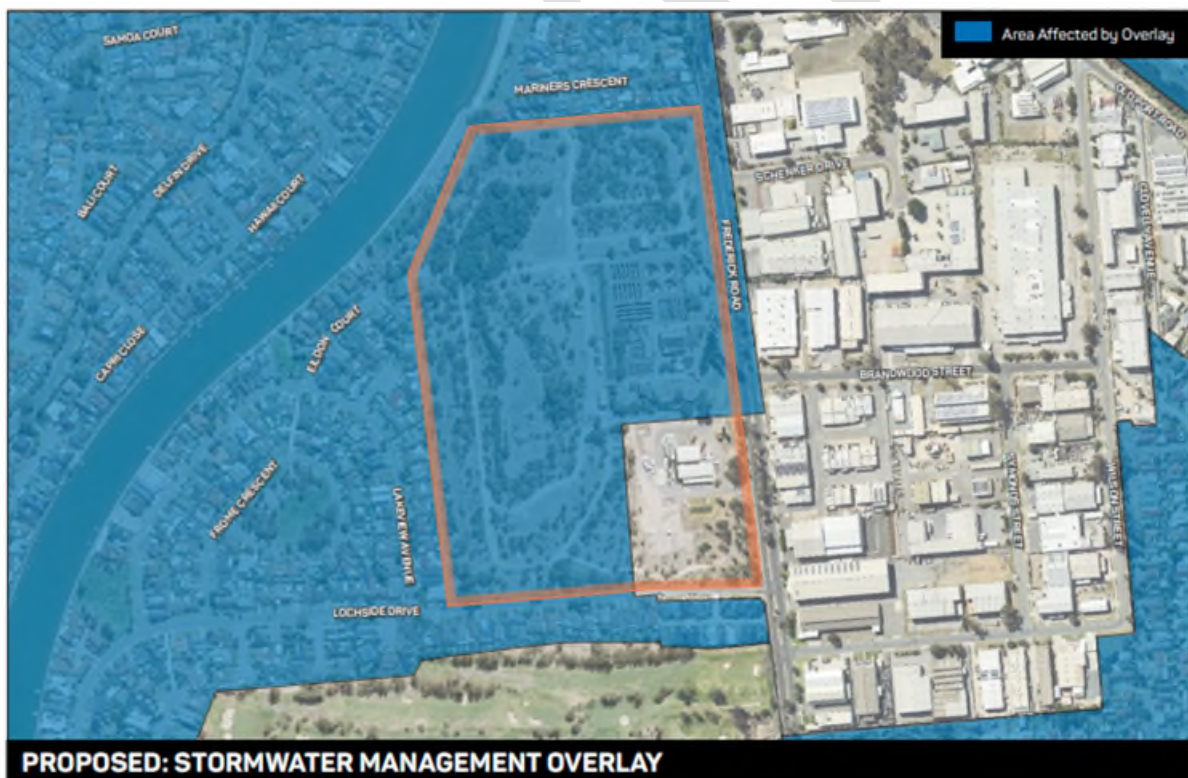


Figure 5.19 *Proposed Stormwater Management Overlay*



PROPOSED: FUTURE LOCAL ROAD WIDENING SETBACK

Local Variation (TNV)

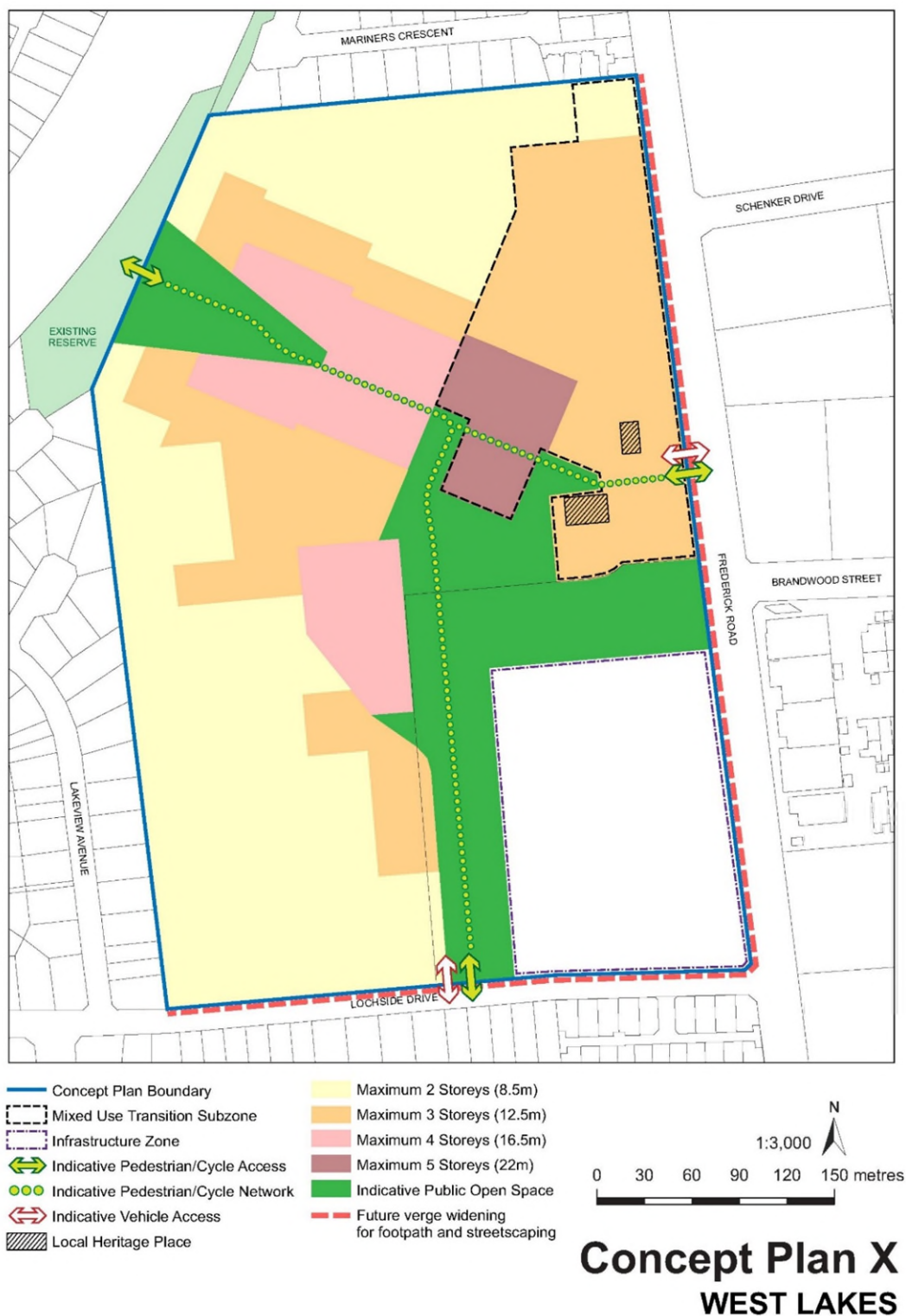
It is proposed to introduce the follow TNVs over the portions of the Affected Area consistent with the proposed Concept Plan:

- Maximum Building Height (levels)(Maximum building height is 2 levels);
- Maximum Building Height (Metres) (Maximum building height is 9 metres);
- Maximum Building Height (levels)(Maximum building height is 3 levels);
- Maximum Building Height (Metres) (Maximum building height is 12.5 metres);
- Maximum Building Height (levels)(Maximum building height is 4 levels);
- Maximum Building Height (Metres) (Maximum building height is 16.5 metres);
- Maximum Building Height (Levels)(Maximum building height is 5 levels); and
- Maximum Building Height (Metres) (Maximum building height is 22m).

It is also proposed to introduce the following TNVs over the whole of the Affected Area (refer to **Figure 5.21** over the page).

- Concept Plan – West Lakes
- Minimum future local road widening setback is 2.5m

Figure 5.21 *Concept Plan – West Lakes*



The proposed policy changes introduced via the Code Amendment, including the 'Urban Renewal Neighbourhood Zone', 'Mixed Use Transition Subzone' and realigned 'Infrastructure Zone' as well as the various Overlays and Technical and Numeric Variations listed above, currently form part of the policy framework established by the Planning and Design Code and can be viewed on the Planning Portal:

<https://code.plan.sa.gov.au/>

ATTACHMENT D – STRATEGIC PLANNING OUTCOMES

1. State Planning Policies

The State Planning Policies (SPPs) require that the Principles of Good Planning are considered in the preparation of any designated instrument, including a Code Amendment.

SPP Key Principles

There are 16 SPPs that include Objectives, Policies and Principles for Statutory Instruments (including the Planning and Design Code). The most critical SPPs in the context of this Code Amendment are:

Integrated Planning

Objective: *To shape cities and regions in a way that enhances our liveability, economic prosperity and sustainable future.*

SPP 1.1 *An adequate supply of land (well serviced by infrastructure) is available that can accommodate housing and employment growth over the relevant forecast period.*

SPP 1.7 *Regenerate neighbourhoods to improve the quality and diversity of housing in appropriate locations supported by infrastructure, services and facilities.*

SPP 1.8 *Mixed-use development around activity centres, public transport nodes and strategic transit corridors to encourage greater use of active transport options such as walking, cycling and public transport.*

Code Amendment

Outcome:

The City of Charles Sturt is experiencing urban renewal in the form of new residential development, townhouses and higher density dwellings, mixed use and infill development. The key drivers influencing urban renewal are:

- Increased demand for new compact urban form at higher densities; and
- Increased demand for housing choice and affordability, including opportunities for an ageing population, people living with a disability and new arrivals.

An assessment of future housing needs found that it is desirable for the inner western metropolitan housing market to diversify in response to population growth and changing demographic characteristics. While there is expected to be continued demand for detached dwellings on larger blocks, demand for infill development will continue as household formation and dwelling occupancy preferences change. Under current planning policy, demand is likely to be met through an over-reliance on minor infill (one into two) residential development. Without greater housing diversity, the dominance of detached housing and a lack of housing choice is expected to continue to place pressure on housing affordability.

The Affected Area provides an opportunity to deliver approximately 16.98 hectares of new residential land in a planned and coordinated manner. The estimated dwelling yield over the Affected Area is in the order of 560 dwelling units or a population of 1,290 people (approx.). The Affected Area is well serviced by regional and local reserves as well as being in close proximity to the Urban Activity Centres of Port Adelaide and West Lakes. The Affected Area is within an established urban area and is well supplied with social infrastructure.

The proposed Mixed Use Transition Subzone provides the opportunity for local commercial facilities to support the day to day needs of the new population.

The Affected Area is well positioned to support existing walking and cycling routes along the adjoining Mariners Reserve and the lake frontage.

Design Quality

Objective: *To elevate the design quality of South Australia's built environment and public realm.*

SPP 2.6 *Maximise opportunities for the Principles of Good Design and community engagement to inform future policy creation and improve design outcomes.*

SPP 2.10 *Facilitate development that positively contributes to the public realm by providing active interfaces with streets and public open spaces.*

SPP 2.12 *Create design solutions for infill development that improves the relationship between buildings and public spaces, and the interface with neighbours.*

Code Amendment

Outcome:

The Code Amendment will facilitate low rise (1-2 storey) and medium rise (3-5 storey) low to medium density residential and/or commercial development with an emphasis on good design outcomes.

The policies contained in the draft Code Amendment aims to facilitate improved interface of the Affected Area with the adjoining lake frontage and its associated walking/cycling paths. The proposed Concept Plan also provides opportunities for improved green linkages through the Affected Area as well as opportunities to link the identified new areas of public open space. The Code Amendment provides the opportunity to encourage walking and cycling through the Affected Area and greater connectivity to the Lake frontage as well as associated end of trip facilities such as bicycle parking and amenities.

Biodiversity

Objective: *To maintain and improve our state's biodiversity and its life supporting functions.*

SPP 4.4 *Enhance the biodiversity of urban areas and townships through a connected and diverse network of green infrastructure systems along streetscapes, major watercourses, linear parks, open space, the coast and other strategic locations.*

SPP 4.6 *Encourage nature-based tourism and recreation that is compatible with, and at an appropriate scale for, conserving the natural values of that landscape.*

Code Amendment

Outcome:

The Code Amendment will facilitate the expansion, support and supplementation of the existing recreational assets by enabling the incorporation of public open space resources that will connect and integrate with the adjoining lake frontage and Mariners Reserve. The proposed area of open space adjoining Mariners Reserve seeks to capture an area of existing vegetation within the Affected Area to maintain its biodiversity.

Climate Change

Objective: *Provide for development that is climate ready so that our economy, communities and environment will be resilient to climate change impacts.*

SPP 5.1 *Create carbon-efficient living environments through a more compact urban form that supports active travel, walkability and the use of public transport.*

SPP 5.3 *Facilitate climate-smart buildings to reduce our demand for water and energy.*

SPP 5.4 *Mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure and other design responses.*

SPP 5.9 *Encourage development that does not increase our vulnerability to, or exacerbate the impacts of climate change and which makes the fullest possible contribution to mitigation.*

Code Amendment

Outcome:

The Code Amendment will facilitate low to medium density residential and/or commercial development within an established and well-serviced area in proximity to walking and cycling paths along the lake frontage.

The Concept Plan includes a desired location of public open space that will integrate into the adjoining Mariners Reserve and improve green linkages through the Affected Area. The proposed area of open space seeks to capture an area of existing vegetation within the Affected Area to maintain its biodiversity.

The 'Urban Trees Canopy Overlay' is proposed over the Urban Renewal Neighbourhood portion of the Affected Area to improve tree canopy coverage. This will assist in reducing the urban heat load and assist in cooling the urban environment.

The Code Amendment facilitates a policy framework that encourages water sensitive urban design (WSUD) and green infrastructure.

Housing Supply and Diversity

Objective: *To promote the development of a well-serviced and sustainable housing and land choices where and when required.*

SPP 6.3 *Develop healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.*

SPP 6.5 *Locate higher density residential and mixed- use development in strategic centres and transport corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.*

SPP 6.6 *A diverse range of housing types within residential areas that provide choice for different household types, life stages and lifestyle choices.*

SPP 6.8 *Ensure a minimum 15% of new housing in all significant developments that meets the criteria for affordable housing.*

Code Amendment

Outcome:

The Code Amendment will facilitate diverse housing options within low to medium density residential and/or commercial development. The Affected Area is located within an established and well-serviced area, in proximity to walking and cycling paths along the

adjoining lake frontage. It is proposed to apply the 'Affordable Housing Overlay' to support delivery of affordable housing.

Employments Lands

Objective: *To provide sufficient land supply for employment generating uses that supports economic growth and productivity.*

SPP 9.2 *Enable opportunities for employment and encourage development of underutilised lands connected to, and integrated with, housing, infrastructure, transport and essential services.*

SPP 9.6 *Protect prime industrial land for employment use where it provides connectivity to freight networks; enables a critical mass or cluster of activity; has the potential for expansion; is connected to skilled labour; is well serviced; and is not constrained by abutting land uses.*

Code Amendment

Outcome:

The Code Amendment will facilitate a range of compatible residential and non-residential land uses in a well-designed mixed-use environment. The envisaged land uses within the 'Mixed Use Transition Subzone' is anticipated to create in the order of 155 full and part time employment opportunities. The Deep End report concludes that commercial land uses within the Affected Area will not impact existing employment land uses within the identified catchment area.

Strategic Transport Infrastructure

Objective: *To integrate land use policies with existing and future transport infrastructure, services and functions to preserve and enhance safe, efficient and reliable connectivity for people and business.*

SPP 11.2 *Development that maximises the use of current and planned investment in transport infrastructure, corridors, nodes and services.*

SPP 11.5 *Encourage development that supports the increased use of a wider variety of transport modes, including public transport, walking and cycling, to facilitate a reduced reliance on private vehicle travel and promote beneficial community health outcomes.*

Code Amendment

Outcome:

The Code Amendment will facilitate greater connectivity to the walking/cycling paths along the lake frontage. Envisaged new shared use paths within the Affected Area will provide greater connectivity to existing public transport routes along Frederick Road to the south and Old Port Road to the north. The Code Amendment seeks to facilitate a walkable neighbourhood to new local services within the 'Mixed Use Transition Subzone'. The Code Amendment will facilitate a new population in the area and will require further consideration for increased public transport services along Frederick Road to cater for the future needs of residents.

Water Security and Quality

Objective: *To ensure South Australia's water supply is able to support the needs of current and future generations.*

SPP 14.2 *Protect and recognise water supply catchments, including:*

- *Water Protection Areas under the Environment Protection Act 1993 (including those located in the Mount Lofty Ranges, South East and River Murray)*
- *The River Murray Protection Areas under the River Murray Act 2003*
- *Prescribed water resources and wells under the Natural Resources Management Act 2004.*

SPP 14.6 *Improve the alignment between urban water management and planning by adopting an integrated water management approach.*

Code Amendment

Outcome:

The Code Amendment recognises the site's proximity to the adjoining lake frontage and seeks to protect and enhance this natural resource. Future residential development over the Affected Area will incorporate best practice water sensitive urban design (WSUD) practices and improve the water quality discharged into the lake.

The Affected Area is not located within either a Water Protection Area nor a River Murray Protection Area. The Code Amendment will continue to apply the 'Prescribed Wells Overlay' and the 'Water Resources Overlay'.

Emissions and Hazardous Activities

Objective: *To protect communities and the environment from risks associated with emissions, hazardous activities and site contamination, whilst industrial development remains viable.*

SPP 16.2 *Assess and manage risks posed by known or potential site contamination to enable the safe development and use of land.*

Code Amendment

Outcome:

It is acknowledged that site contamination is a complex and broad issue impacting large areas of land across the State. With the increasing focus on urban renewal and reinvigoration of existing urban areas, it is critical that site contamination issues are identified and addressed to safeguard communities and the environment.

The Site Contamination Audit Statement (SCAS) concluded that whilst site contaminating of soil does exist over the Affected Area for a low density residential land use (HIL A), this can be adequately managed in the pre-construction phase of the development by the placement of shallow clean fill. The Auditor concludes that there is no actual or potential risk to human or environmental receptors for the Affected Area for the likely anticipated land uses, with the Audit Site being deemed suitable for sensitive uses or another use or range of uses, subject to the conditions on land and groundwater (refer to **Attachment L**).

2. Regional Plans

The Regional Plan

The relevant volume of the Regional Plan is the '30-Year Plan for Greater Adelaide'. The investigations undertaken to date and outlined in this Code Amendment, will ensure that the proposed rezoning is largely consistent with the key policies and targets of the 30-Year Plan for Greater Adelaide as described below.

In summary, the Code Amendment supports the key policies and targets of 30-Year Plan for Greater Adelaide as follows:

Regional Plan 30–Year Plan for Greater Adelaide:

Policy Theme Transit corridors, growth areas and activity centres.

Policy 1 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.

Policy 2: *Increase residential and mixed-use development in the walking catchment of:*

- *Strategic activity centres*
- *Appropriate transit corridors*
- *Strategic railway stations.*

Policy 3: *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.*

Policy 4: *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.*

Policy 5: *Encourage medium rise development along key transport corridors, within activity centres and in urban renewal areas that support public transport use.*

Policy 8: *Provide retail and other services outside designated activity centres where they will contribute to the principles of accessibility, a transit-focused and connected city. High quality urban design, and economic growth and competitiveness.*

Policy 10: *Allow for low-impact employment activities in residential areas, such as small-scale shops, offices and restaurants, where interface issues can be appropriately managed.*

Action 4: *Rezone strategic sites to unlock infill growth opportunities that directly support public transport infrastructure investment.*

Code Amendment:

Outcome:

The Code Amendment will:

- Facilitate additional housing opportunities at increased densities within an established urban area;
- Facilitate opportunities for greater housing diversity to meet changing household needs;
- Include a 'Mixed Use Transition Subzone' to facilitate a range of mix-use development including limited retail and commercial land uses to service the proposed residential uses and provide potential employment opportunities; and
- The Affected Area is considered to be a large consolidated parcel for a general infill site.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Design quality

Policy 26: *Develop and promote a distinctive and innovative range of building typologies for residential housing which responds to metropolitan Adelaide's changing housing needs, reflects its character and climate, and provides a diversity of price points.*

Policy 28: *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.*

Policy 29: *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.*

Action 16: *Ensure that the local area planning process adequately address interface issues in the local context and identify appropriate locations for:*

- *Medium and high-rise buildings*
- *Where there should be minimum and maximum height limits.*

Code Amendment:**Outcome:**

The Code Amendment will:

- Include a Concept Plan that depicts building heights across the Affected Area to ensure that building heights transition from adjacent low-rise residential areas to a centralised medium -rise built form;
- The West Lakes Concept Plan TNV depicts the likely area of future public open space and green linkages for the surrounding street network;
- The code amendment, in particular the Concept Plan TNV provides an emphasis on enhancing connectivity with the adjoining Mariners Reserve and lake frontage; and
- Provide the opportunity for a range of housing products and densities to be provided which cater for differing lifestyles and affordability.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Housing mix, affordability and competitiveness

Policy 36: *Increase housing supply near jobs, services and public transport to improve affordability and provide opportunities for people to reduce their transport costs.*

Policy 37: *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.*

Policy 45 *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.*

Policy 46 *Ensure an adequate land supply is available to accommodate housing and employment growth over the longer term (at least a 15 year supply).*

Target 1.1 *85% of all new housing in metropolitan Adelaide will be built in established urban areas by 2045.*

Target 2 *60% of all new housing in metropolitan Adelaide is built within close proximity to current and proposed fixed line (rail/tram/O-Bahn) and high frequency bus routes by 2045.*

Target 5 *Urban green cover is increased by 20% in metropolitan Adelaide by 2045.*

Target 6 *Increase housing choice by 25% to meet changing household needs in Greater Adelaide by 2045.*

Code Amendment:**Outcome:**

The Code Amendment specifically delivers an infill housing outcome in proximity to services and jobs. The proposal includes the insertion of the 'Affordable Housing Overlay' to increase opportunity for various housing forms to occur. The insertion of the 'Urban Tree Canopy Overlay' will provide a policy framework for increased canopy cover to assist in the cooling of the urban environment. The Code Amendment provides indicative public open space shown in the Concept Plan that is well above the legislative requirements (in the order of 20 percent compared to the 12.5% legislated).

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Health, Wellbeing and Inclusion

Policy 47: *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.*

Policy 48 *Create greenways in transit corridors, along major watercourse linear parks, the coast and other strategic locations to provide walking and cycling linkages.*

Policy 50 *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.*

Policy 53: *Encourage the integration of green infrastructure in the public and private realms to support positive physical, mental and social health outcomes.*

Code Amendment:

Outcome:

The Code Amendment provides the opportunity to increase green linkages to Mariners Reserve, the lake frontage as well as well-design local areas of public open space. The Code Amendment will facilitate greater enjoyment and connectivity to this major watercourse and the recreation benefits it offers.

The insertion of the 'Affordable Housing Overlay' provides a policy framework to ensure a minimum of 15% affordable housing is provided within the Affected Area. Through this policy, housing diversity is aimed to be achieved.

The insertion of the 'Urban Tree Canopy Overlay' and the retention of the 'Regulated and Significant Tree Overlay' provides a policy framework to not only retain trees across the Affected Area but enhance the canopy coverage. This will improve cooling of the urban environment and reduce the urban heat impacts compared to sparsely vegetated land that presently exists across the majority of the Affected Area. The spatial location of a portion of the indicative public open space shown on the Concept Plan closest to Mariners Reserve aims to retain an area of existing vegetation to retain its biodiversity.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: The economy and jobs

Policy 56: *Ensure there are suitable land supplies for the retail, commercial and industrial sectors.*

Policy 73: *Provide sufficient strategic employment land options with direct access to major freight routes to support activities that require separation from housing and other sensitive land uses.*

Code Amendment:

Outcome:

The Code Amendment facilitates a policy framework that enables retail and commercial land uses that do not undermine the Port Adelaide and West Lakes Urban Activity Centre Zones nor the Royal Park/Hendon Suburban Activity Centre Zone. The Code Amendment will facilitate local services that are within a walkable distance from the future residential development.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Transport

Policy 75: *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.*

Policy 77 *Ensure that new housing (and other sensitive land uses) permitted in locations adjacent to airports and under flight paths or near major transport routes (road, rail and tram) mitigates the impact of noise and air emissions.*

Policy 78 *Improve, prioritise and extend walking and cycling infrastructure by providing safe, universally accessible and convenient connections to activity centres, open space and public transport.*

Code Amendment:

Outcome:

The new residential community over the Affected Area facilitated by this Code Amendment will improve walking and cycling green linkages to Mariners Reserve and the lake frontage.

The rezoning will have no impact on the existing 'Airport Building Heights (Regulated) – All structures over 110 metres Overlay'.

Noise modelling undertaken by Resonate (refer to **Attachment J**) has confirmed that future sensitive land uses within the Affected Area will not be impacted by existing road and industry noise. The existing 'Interface Between Land Uses' provisions of the Code include sufficient policy to minimise adverse impacts to existing and future sensitive land uses.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Infrastructure

Policy 86 *Ensure that new urban infill and fringe and township development are aligned with the provision of appropriate community and green infrastructure, including:*

- *walking and cycling paths and facilities*

- *local stormwater and flood management including water*
- *sensitive urban design*
- *public open space*
- *sports facilities*
- *street trees*
- *community facilities, such as child care centres, schools, community hubs and libraries.*

Code Amendment:

Outcome:

Open Space, Stormwater and Services, Vegetation and Traffic Investigations that have informed this Code Amendment have resulted in the West Lakes Concept Plan. The Concept Plan aims to ensure that new urban infill development within the Affected Area is undertaken in an environmentally sensitive manner with best practice urban design to provide a new community that enhances residence wellbeing and minimise its impact on the urban environment. The Concept Plan envisages green linkages and shared use paths through the Affected Area to connect to Mariners Reserve and the lake frontage.

The inclusion of the 'Stormwater Management Overlay' provides a policy framework for the use of Water Sensitive Urban Design (WSUD) techniques to be incorporated into future development. This may include swales, rain gardens and bio-filtration tree pits (subject to future development applications). It is anticipated that the internal road network within the Affected Area will provide the opportunity for local street tree planting and incorporation of WSUD techniques.

The 'Urban Renewal Neighbourhood Zone' and the 'Mixed Use Transition Subzone', will allow for a mixed use environment to encourage low-intensity non-residential land uses such as shops, child care centre and other complementary land uses.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Biodiversity

Policy 92 *Support the enhancement of the urban biodiversity of metropolitan Adelaide through the development of greenways in transit corridors, along major watercourses, linear parks and the coast and in other strategic locations.*

Policy 95 *Support the enhancement of the urban biodiversity of metropolitan Adelaide through a connected and diverse network of green infrastructure.*

Code Amendment:

Outcome:

Vegetation and Open Space investigations have informed the West Lakes Concept Plan that provides green linkages and a biodiversity corridor linking to Mariners Reserve and the lake frontage.

The future local road network within the Affected Area will provide opportunities for street tree planting and greenways connecting to the adjoining local road network.

The application of the 'Urban Tree Canopy Overlay' and the retention of the 'Regulated and Significant Tree Overlay' will provide a policy framework to increase canopy cover over the Affected Area and retain existing trees.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Open Space, Sport and recreation

Policy 104 *Investigate opportunities to increase the amount and/or quality of public open space provision in areas of low open space provision and areas of increasing population growth.*

Code Amendment:

Outcome:

Open Space investigations have informed the West Lakes Concept Plan that demonstrates a greater linkage of public open space to existing recreation areas and walking/cycling paths within the adjoining Mariners Reserve and lake frontage. This will assist in usable public open space for future residence and existing community and contribute to the well-being of the community. The Concept Plan shows indicative public open space areas in the order of 20 percent of the Affected Area which is well above the legislative requirement of 12.5%. The indicative areas of public open space also seek retain a vegetated area near Mariners Reserve to preserve its biodiversity.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Climate Change

Policy 105 *Deliver a more compact urban form to:*

- *conserve areas of nature protection areas*
- *reduce vehicle travel and associated greenhouse gas emissions.*

Policy 107 *Increase the proportion of low-rise, medium-density apartments and attached dwellings to support carbon-efficient living.*

Policy 111 *Create a more liveable urban environment through establishing a network of greenways, bicycle boulevards, tree-lined streets and open spaces, which will have a cooling effect on nearby neighbourhoods and buildings.*

Code Amendment:

Outcome:

The Code Amendment facilitates low and medium rise infill residential development. The Code Amendment and associated Concept Plan seeks to maximise opportunities for alternative transportation use including cycling and walking paths linking to the existing Mariner's Reserve. The Concept Plan shows indicative public open space areas in the order of 20 percent of the Affected Area which is well above the legislative requirement of 12.5%. The indicative areas of public open space also seek retain a vegetated area near Mariners Reserve to preserve its biodiversity.

The future internal road network will provide opportunity for street-tree planting. The inclusion of the 'Urban Tree Canopy Overlay' and the retention of the 'Regulated and Significant Tree Canopy Overlay' will provide a policy framework for the retention of existing trees and enhanced tree canopy over the Affected Area which will aim to contribute to the cooling of the urban environment.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Water

Policy 115 *Incorporate water-sensitive urban design in new developments to manage water quality, water quantity and water use efficiency and to support public stormwater systems.*

Policy 117 *Increase the provision of stormwater infrastructure (including water sensitive urban design) to manage and reduce the impacts of:*

- *run-off from infill development*
- *urban flooding from increased short-duration intense rainfall events associated with climate change*
- *pollution from roads and other developed areas.*

Code Amendment

Outcome:

The Code Amendment will facilitate development that will improve water quality through adopting water sensitive urban design (WSUD) treatments that reduce the risk of flooding.

Regional Plan: 30-Year Plan for Greater Adelaide:

Policy Theme: Emergency management and hazard avoidance

Policy 121 *Ensure risk posed by known or potential contamination of sites is adequately managed to enable appropriate development and safe use of the land.*

Policy 122 *Mitigate the impact of extreme heat events by designing development to create cooler communities through the use of green infrastructure.*

Code Amendment

Outcome:

The Code Amendment will facilitate an increased urban tree canopy over the Affected Area through the proposed application of the Code's 'Urban Tree Canopy Overlay' which seeks new development to preserve and enhance urban tree canopy through the planting of new trees and retention of existing mature trees where practicable.

The Code Amendment and associated Concept Plan seeks to maximise opportunities for cycling and walking paths linking to the existing Mariners Reserve and lake frontage. The Concept Plan shows indicative public open space areas in the order of 20 percent of the Affected Area which is well above the legislative requirement of 12.5%. The indicative areas of public open space also seek retain a vegetated area near Mariners Reserve to preserve its biodiversity.

The future internal road network will provide opportunity for street-tree planting.

The Site Contamination Audit Statement (SCAS) confirms that the Affected Area is suitable for the intended sensitive land uses or other range of uses subject to the audit conditions on land and groundwater being applied to any future development applications. The Planning and Design Code's Site Contamination General Development Policies provide suitable policy support for relevant authorities in ensuring this matter is addressed for sensitive land uses at the development application stage.

3. Other Strategic Plans

City of Charles Sturt Community Plan 2020 – 2027

The City of Charles Sturt 'Community Plan 2020-2027' (the 'Community Plan') outlines key strategies to achieve the shared community vision of the Council area. The Community Plan outlines five (5) key pillars which are supported by their own outcomes and measures of what success looks like. Importantly the Community Plan seek to facilitate the creation of "a leading, liveable city".

Our Liveability – A liveable city of great places

- 'A well-designed urban environment that is adaptive to a diverse and growing city.'
- 'Drive an integrated responsive transport system and well-maintained network of roads and paths that facilitate safe, efficient and sustainable connections'
- 'Enhance the quality and diversity of open and public spaces'

Our Environment – An environmentally responsive and sustainable city

- 'Our city is greener to reduce heat island effects and enhance biodiversity'

Our Economy – An economically thriving city

- 'Business and industry sectors continue to grow and diversify'

Code Amendment:

Outcome:

The Code Amendment contributes to achieve the vision of the Community Plan by unlocking the development potential of a key site along a State Maintained Road corridor and immediately adjoining Mariners Reserve and the lake frontage which will activate the streetscape and provide additional housing options for the local community.

The inclusion of the 'Urban Tree Canopy Overlay' in the Code Amendment and retention of the 'Regulated and Significant Tree Overlay' provide a policy framework to retain and enhance the tree canopy over the Affected Area assisting to reduce the heat island effect. The Concept Plan shows indicative public open space areas in the order of 20 percent of the Affected Area which is well above the legislative requirement of 12.5%. The indicative areas of public open space also seek retain a vegetated area near Mariners Reserve to preserve its biodiversity.

The future internal road network provides the opportunity for street tree planting and water sensitive urban design (WSUD) techniques to be implemented.

The 'Urban Renewal Neighbourhood Zone' and particularly the 'Mixed Use Transition Subzone' will allow for a diversity of complementary land uses that will contribute to a vibrant and dynamic community which will grow economic development within the City.

City of Charles Sturt – Draft Your Neighbourhood Plan 2020

The City of Charles Sturt draft 'Neighbourhood Plan 2020' recognises that the Council area plays an important role in Adelaide's future, covering a large area of western Metropolitan Adelaide. The Plan recognises that the Council area will accommodate in the order of 1,150 people each year and up to 500 new dwellings across the city of Charles Sturt. The draft 'Your Neighbourhood Plan' seeks to improve the liveability of neighbourhoods, through the following driving philosophies:

Community Services	Living within 400m of social infrastructure leads to higher levels of walking and cycling, saving the economy millions of dollars in reduced congestion, better health and well-being and less environmental impacts.
Local Open Space	Accessible and inclusive open space designed for all ages and abilities, increases exercise levels, enables local people to meet and helps reduce pollution and CO ² levels.
Urban Canopy	An increase in tree cover by 10% can reduce the energy needed for heating and cooling by 5-10%; and increase biodiversity, amenity and enhance property values.
Walkable Neighbourhood	In walkable neighbourhoods household transport costs can be halved, vehicle pollutants reduced, and local trading increased.
New Developments	Infill development that meets the desired planning policies to offer housing diversity and affordability.
Living Streets	Infrastructure for stormwater management and safe driving, cycling, walking and meeting, for people of all abilities, can be included in street design.
Green Verges	Greener verges can become residents gardens, increase street amenity and neighbour interaction.
Access to public transport	Safe and easy access for people of all abilities to nearby train and bus stops will encourage use of public transport and reduce pollution and traffic congestion.

Code Amendment:

Outcome:

The Code Amendment facilitates a policy framework to support an anticipated future population of 1,290 people contained within 560 dwelling units (approx.). The future development of the Affected Area will play a key role in accommodating the anticipated population growth within the City of Charles Sturt.

The Desired Outcome of the 'Urban Renewal Neighbourhood Zone' envisages diverse housing options with supportive and complimentary community services. The rezoning will cater for housing choice and affordability in a walkable and vibrant neighbourhood, consistent with the driving philosophies of the draft '*Your Neighbourhood Plan 2020*.'

Attorney General's Department – Land Supply Report for Greater Adelaide

The June 2021 *Land Supply report for Greater Adelaide* is an evidence based report by the Planning and Land Use Services Directorate of the Attorney-General's Department (PLUS_AGD) which provides a single source of data around residential and employment land trends, land supply and estimated future demand for both a medium and high population growth scenario.

Part 2 of the report analyses urban infill supply and demand for key metropolitan regions of Greater Adelaide. The Affected Area is located within the Adelaide West region of the report, which identifies that an estimated 10,600 dwellings for medium growth and 15,700 dwellings for high growth will be required over the next ten (10) years which is anticipated to be delivered from urban infill land supply.

Code Amendment

Outcome:

The Affected Area is considered to be an urban infill site in the Adelaide West region that has the potential to provide for dwelling growth. The Code Amendment 'unlocks' the residential development potential of this key strategic site.