

## Consultation Submission Form

### *Planning and Design Code for South Australia*

This submission form is being used to collect feedback about the new Planning and Design Code. Your input will help build the new planning rules for our State.

\* Which part of the Planning and Design Code would you like to make a submission about?

*(Please click the circle to select which part of the Code you wish to comment on. You can also see which council areas are included in the rural and urban code via the links below.)*

- My submission relates to Rural code. [\(click here for council areas\)](#)
- My submission relates to Urban code. [\(click here for council areas\)](#)
- My submission relates to **Statewide code**

*This consultation process is powered by pernix*

## Consultation Submission Form

### *Planning and Design Code for South Australia*

#### Personal Details

\* Please provide your contact details below *(Name, Postcode & Email are mandatory)*

Please be advised that your submission will be made publicly available on the SA Planning Portal.

Name	Sam Green
Company	City of Playford
Address	██████████, Davoren Park
Your Council Area	City of Playford
State	SA
Postcode	5113
Country	Australia
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## Consultation Submission Form

### *Planning and Design Code for South Australia*

\* Which sector do you associate yourself with?

- Local Government
- State or Federal Government
- Development Industry
- Business
- General Public
- Community Group

## Consultation Submission Form

### *Planning and Design Code for South Australia*

\* Would you like to make comment on

Specific Topics for example :

- Rules of Interpretation
- Zones and Sub-zones
- Overlays
- General Provision
- Mapping Land Use Definitions
- Administrative Definitions
- Referrals
  - Table of Amendments

General comments

All of the above

## Consultation Submission Form

### *Planning and Design Code for South Australia*

The Planning and Design Code consists of Rules of Interpretation, Referrals, Mapping, Table of Amendments, Overlays, Zones, Subzones, General Policy, Land Use Definition and Admin Definitions. You can choose to comment individually on each of these components as well as enter general feedback in the following pages.

*Please note there is no 'save and return' facility - you will need to add all of your comments and submit the form at the same time.*

Enter your feedback for Rules of Interpretation

Enter your feedback for Referrals

Enter your feedback for Mapping

Enter your feedback for Table of Amendments

## Consultation Submission Form

### *Planning and Design Code for South Australia*

Please enter your feedback for overlays

*click next at the bottom of the page for next topic*

Advertising Near  
Signalised Intersections  
Overlay

Affordable Housing  
Overlay

Aircraft Noise Exposure  
Overlay

Airport Building Heights  
(Aircraft Landing Area)  
Overlay

Airport Building Heights  
(Regulated) Overlay

Building Near Airfields  
Overlay

Character Area Overlay

Character Preservation  
District Overlay

Coastal Areas Overlay

Defence Aviation Area  
Overlay

Design Overlay

Dwelling Excision  
Overlay

Environment and Food  
Production Area  
Overlay

Future Road Widening  
Overlay

Hazards (Acid Sulfate  
Soils) Overlay

Hazards (Bushfire  
General Risk) Overlay

Hazards (Bushfire High  
Risk) Overlay

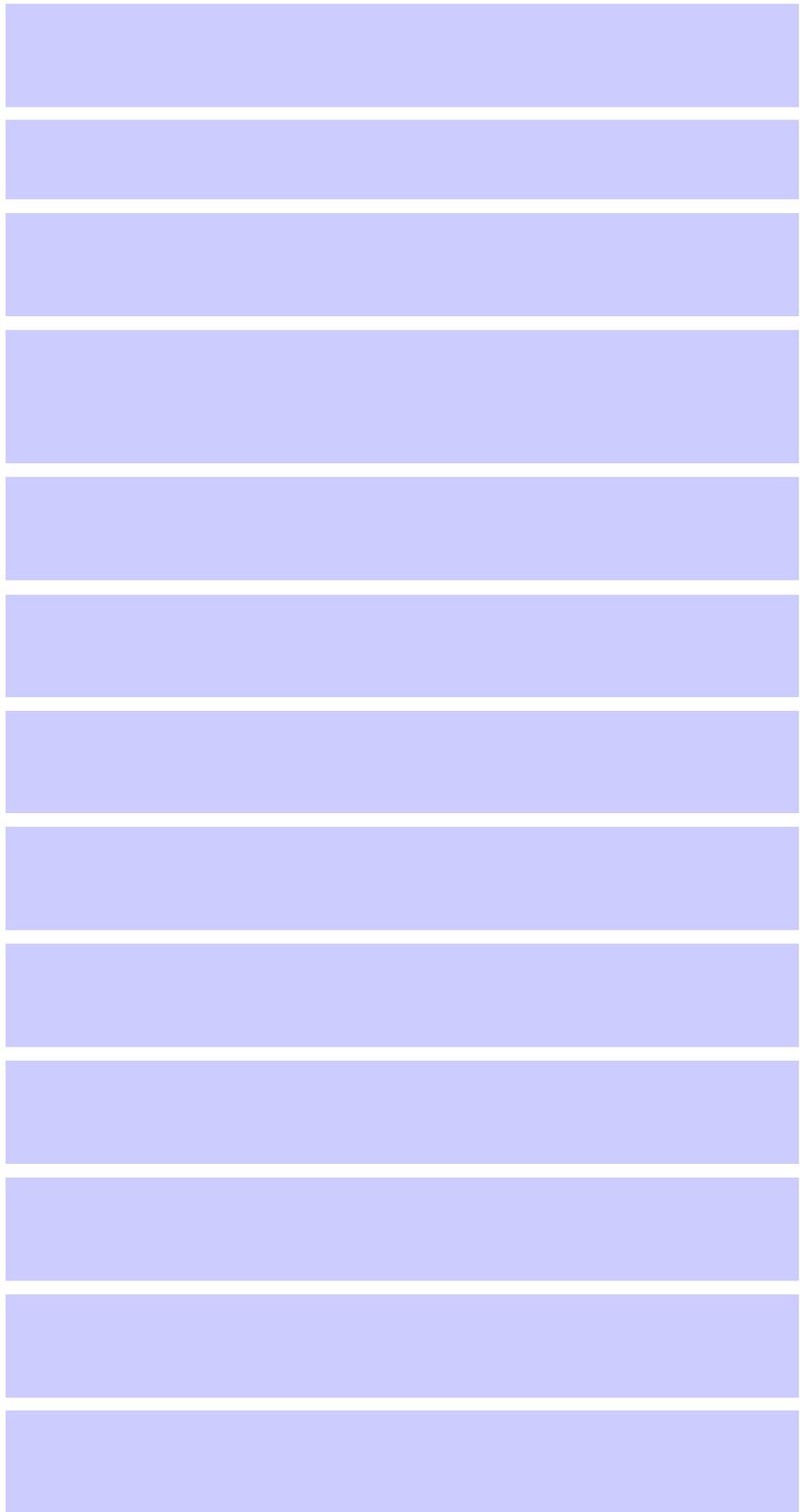
Hazards (Bushfire  
Medium Risk) Overlay

Hazards (Bushfire  
Outback) Overlay

Hazards (Bushfire  
Regional) Overlay

Hazards (Bushfire Urban  
Interface) Overlay

Hazards (Flooding)  
Overlay



Historic Area Overlay



Historic Shipwrecks  
Overlay



Key Outback and Rural  
Routes Overlay



Key Railway Crossings  
Overlay



Limited Dwelling Overlay



Limited Land Division  
Overlay



Local Heritage Place  
Overlay



Major Urban Transport  
Routes Overlay



Marine Parks (Managed  
Use) Overlay



Marine Parks (Restricted  
Use) Overlay



Mount Lofty Ranges  
Catchment (Area 1)  
Overlay



Mount Lofty Ranges  
Catchment (Area 2)  
Overlay



Murray Darling Basin  
Overlay



Native Vegetation  
Overlay

Noise and Air Emissions  
Overlay

Non-Stop Corridor  
Overlay

Prescribed Surface  
Water Area Overlay

Prescribed Water  
Resources Area Overlay

Prescribed Watercourse  
Overlay

Prescribed Wells Area  
Overlay

RAMSAR  
Wetlands Overlay

Regulated Trees Overlay

Resource Extraction  
Protection Area Overlay

River Murray Flood Plain  
Overlay

N/A

River Murray Tributaries  
Area Overlay

N/A

Significant Industry  
Interface Overlay

Significant Landscape  
Protection Overlay



Sloping Land Overlay



State Heritage Area  
Overlay



State Heritage Place  
Overlay



State Significant Native  
Vegetation Overlay



Strategic Infrastructure  
Gas Pipelines Overlay



Traffic Generating  
Development Overlay



Urban Transport Routes  
Overlay



Water Protection Area  
Overlay



Water Resources  
Overlay



# Consultation Submission Form

## *Planning and Design Code for South Australia*

Please enter your feedback for zones and subzones

*click next at the bottom of the page for next topic*

Adelaide Oval Subzone

Animal Husbandry  
Subzone

Aquaculture Zone

Business  
Neighbourhood Zone

Capital City Zone

Caravan and Tourist  
Park Zone

City Frame Subzone

City Living Zone

City Main Street Zone

City Park Lands Zone

City Riverbank Zone

## Coastal Waters Zone

## Commonwealth Facilities Zone

### **Recommended action/change:**

The zone should identify the kinds of development that are subject to State planning laws and include assessment criteria, otherwise the zone does not appear to serve any real purpose in the context of the Planning and Design Code.

### **Question the need for the proposed transition:**

Does the zone serve any purpose?

### **Commentary:**

The Commonwealth Facilities Zone is a proposed new zone which would apply to Commonwealth owned land adjacent the RAAF Edinburgh airbase that recognises existing commonwealth facilities and the future development of Federal Government owned land for large-scale aviation and defence-related activities. There is no equivalent zone within the current Development Plan and the land is excluded from Development Plan policy.

The new Commonwealth Facilities Zone would have a minor impact/change given that most development on Federal land is subject to Commonwealth laws and therefore is exempt from approval under the Planning, Development and Infrastructure Act 2016.

## Community Facilities Zone

### **Recommended Action/Change :**

- 1) Replace the Community Facilities Zone with the Suburban Activity Centre in the following locations:
  - Elizabeth Downs Centre on Hamblyn Road (current zoning is Local centre with a community facilities policy area).
  - Elizabeth East Centre on Midway Road (current zoning is Local centre with a community facilities policy area).
  - Elizabeth North Centre on Woodford Road (current zoning is Local centre with a community facilities policy area).
- 2) Include the Meals on Wheels site at Elizabeth Grove within the Housing Diversity Zone (which is also the adjacent zoning).
- 3) Include the Community Facilities Zone adjacent the Elizabeth Centre in the Urban Activity Centre.

### **Recommend agreement with proposed transition:**

With the exception of these areas referred to above the transition to Community Facilities Zone is endorsed.

### **Commentary**

There are several locations where the Community Facilities Zone is proposed to be applied to replace current zoning. In the following locations it is considered that the Zone should be replaced by the Suburban Activity Centre:

- Elizabeth Downs Centre on Hamblyn Road (current zoning is Local centre with a community facilities policy area).
- Elizabeth East Centre on Midway Road (current zoning is Local centre with a community facilities policy area).
- Elizabeth North Centre on Woodford Road (current zoning is Local

centre with a community facilities policy area).

The proposed alternative Suburban Activity Centre provides a broader range of development options for these sites which are currently underutilised. The zone is consistent with the proposed new zoning of the remainder of land within these centres.

At Elizabeth Grove, the Community Facilities Zone (accommodating Meals on Wheels) should be replaced by the Housing Diversity Neighbourhood Zone which, while supporting community uses, would enable a broader range of activities if there was a desired change of use. This would be contiguous/consistent with the proposed adjoining zoning.

The proposed Community Facilities Zone at Elizabeth Regional Centre should be incorporated into the Urban Activity Centre (consistent with the current Regional Centre Zoning of the site).

**Recommend agreement with proposed transition:**

The new Community Facilities Zone is considered to be an appropriate transition in the following three locations where community facilities are the dominant and sustainable land use:

- The corner of Yorktown and Shillabeer Roads (currently Community Zone).
- Craigmore – opposite the Craigmore shopping centre on (currently Neighbourhood Centre Zone with a policy area related to community facilities)
- Portion of an area adjacent the Munno Para Centre (currently Zoned District Centre with policies related to community facilities).

Conservation Zone

Aquaculture and  
Recreation Subzone

Dwelling Subzone

Small Scale Settlement  
Subzone

Visitor Experience  
Subzone

Cultural Institutions  
Subzone

Deferred Urban Zone

**Recommend Agreement with proposed zone transition:**

The current Deferred Urban Zoning transitions to a new zone of the same name and applies to the same areas. The zone is very similar to the current Development Plan Zone and considered to be an appropriate transition.

Eastern Park Lands  
Subzone

Education and  
Innovation Zone

Employment Zone

**Recommended Action/Change:**

- 1) Amend the proposed Employment Zone to reduce the desired development size for shops to 250 square metres (per allotment) with 500 square metres (per allotment) as Restricted development.
- 2) Include current Concept Plan Map Play/32 and ensure context is provided in policy to ensure appropriate location of higher impact industries adjacent Riverlea (Buckland Park).
- 3) Correct Restricted development provision to ensure that Special Industry is Restricted and not excluded from the restriction.

**Recommend agreement with proposed transition:**

The transition from Industry Zone to Employment Zone and Urban Employment to Employment Zone is appropriate with the above recommendations for change.

**Commentary:**

The proposed new Employment Zone is generally considered to be a satisfactory transition to replace two current zones within the City of Playford which are the Industry Zone and the Urban Employment Zone.

Employment Zone to replace Industry Zone

The Employment Zone is proposed to replace the Industry Zone in four locations throughout the City including the Lionsgate site (former Holden site), Elizabeth South, Virginia and in two locations in the proposed Buckland Park development. The Employment Zone is the most flexible Industry/Employment zone of the suite of proposed new Code Zones.

The three areas within the current Industry Zone are of quite different character.

- The proposed Employment Zone is generally appropriate for the Lionsgate site, given the flexibility of the existing site for a broad range of uses, with the exception of Special industry which is appropriately proposed as a form of Restricted development. However, it is noted that a shop is able to be considered up to a floor area of 1000 square metres, bulky goods can be accommodated above this limitation. It is restricted above this level. A shop or group of shops is currently able to be considered up to only 250 square metres. It is noted that there is potential for the division of land to create parcels that would allow for multiple sites with the potential of up to 1000 square metres (while noting that the policy guidance suggests that 500 square metres is the appropriate maximum floor space for shops).

Given the scale of this site and extensive frontage to Phillip Highway the capacity to accommodate a substantial amount of retail development and bulky goods development is noted. There is a concern about the potential for impact on the Regional Centre and other centre locations particularly in the southern portion of the city including the Regional Centre (CBD). This is a major proposed shift in policy which has not undergone appropriate levels of investigation and analysis. On this basis it would be appropriate to reduce the level of shopping development to (Restricted development – 500 square metres; guidelines for maximum floor - 250 square metres). These policies would apply to all shops including bulky goods.

- The proposed transition in the Buckland Park area is considered appropriate. It is noted however, that current policy guides higher impact industries to the south west of the policy area where it is considered that any potential impact on residential development would be minimised. This policy does not get carried across because of the loss of 'green text' local additions in the transition process. Significant guidance is provided by the Desired character statement under the current controls (but is absent in the new), which also links to a concept plan which has been retained for the Buckland Park Development. Concept plan Play/32 is however, missing and should be retained as it is useful in guiding development within the area.
- The proposed Employment Zone is appropriate for transition to replace the current Industry Zone in Virginia.

#### Employment Zone to replace current Urban Employment Zone

The Employment Zone is proposed to replace the current Urban Employment Zone in several locations. Urban Employment Zones were created with the Playford Growth areas DPAs and includes the SCT intermodal area in Penfield, the Edinburgh North and Penfield Industry area (between Bellchamber Road/Winterslow Road and Womma road which includes the new Drake warehouse facility, and an area of land on the northern side of Womma Road in Penfield.

The transition of the current Urban Employment Zone to the Employment Zone is generally considered to be appropriate. Urban Employment Zone is the most flexible of current industry zones already allowing a commercial element.

- Should be noted that the new Employment Zone does not impose additional restrictions as per the current Policy Area 21 to avoid a range of activities which are not compatible with the SCT interchange. For example several forms of development, including bulky goods outlet, consulting room, indoor recreation centre, office petrol filling station, service industry and service trade premises are non-complying. It is noted that the land within this area / part of the zone is understood to be entirely owned by SCT so that the owners have the ability to determine the types of activities that suit / are compatible with their activities. On this basis it may be appropriate to maintain a reduced range of restricted development, although it is noted that overall within the Code it is considered that the forms of Restricted development are too limited – see discussion elsewhere.
- The Employment Zone is reasonably well suited for transition to both the Womma Road Penfield land and the Edinburgh North / Penfield land.

It is noted that there is an error within the Zone which makes Industry a Restricted Development, while Special Industry is excluded from that requirement. Special Industry should be designated as Restricted Development (not Industry).

Employment (Bulk Handling) Zone

Entertainment Subzone

Gouger and Grote Street Sub Zone Subzone

Greenfield Neighbourhood Zone

Hard-edged Built Form Subzone

Health Subzone

Hills Face Zone

**Recommended Action/Change:**

It should be made clear in the new Hills Face Zone that, in line with the current Zone, the Zone is not a residential area (residential development is not the primary intent of the zone).

**Recommend agreement with proposed transition:**

With the exception of the above matter, the Hills Face Zone is considered to be a suitable transition.

**Commentary:**

Overall, the zone is considered to be a suitable and generally consistent replacement for the existing Hills Face Zone. There are not any alternative zones of a similar nature. The Desired Outcomes (DO) for the new Hills Face Zone are generally a literal translation of existing policy with most lists and wording directly carried over to the new zone. DO 1 should be amended to correct the list which starts at item b).

The new Zone results in the loss of a policy area (Watershed), however it is replaced with an Overlay (Mount Lofty Ranges Water Supply Catchment Area 1) which covers the same area.

The most substantial change is the loss of a direct reference to the Hills Face Zone not being a residential zone. The existing words from the Development Plan should be retained so as to not create unreasonable expectations about residential development opportunity within the Zone.

Another matter of note, is an increase to excavation and filling height

triggers for restricted development (maximum of 3 metres) creating greater flexibility with a guideline height of no greater than 1.5 metres.

The list of restricted development is a rationalisation of the current non-complying development list. Notably the current exemptions for landfill and mining have not been carried over to the new Zone (they are now proposed as restricted development) and this is supported.

Hindley Street Subzone

Home Industry Zone

Rural Horticulture Zone

**Recommended Action /Change:**

- 1) Reduce the range of activities which will be likely to conflict with the primary activity of horticulture or take horticultural land out of production. Activities such as transport distribution (other than ancillary to horticulture), dwellings and tourist accommodation (other than ancillary to horticulture) should be very limited in the area and not restrict the development or use of adjoining or nearby land.
- 2) Reintroduce Land division as a form of Restricted development as it is likely to take horticultural land out of production.
- 3) Provide a bespoke zoning solution for the transition of the Value-adding (Virginia) DPA to ensure that the major potato and onion processing development can be appropriately accommodated in the zone, noting the Rural Horticulture Zone is not an appropriate transition.
- 4) Include a setback for horticultural development from townships and residential zones (currently 300 metres).
- 5) Include stocking rates and policies for structures for horse keeping.
- 6) Include reference to dwellings in the Flood Hazard overlay as they are a vulnerable form of development and frequently house vulnerable people such as the elderly and disabled.

**Recommend agreement with proposed transition:**

In general the zone transition from Primary Production to Rural Horticulture is suitable with the exception of matters indicated above.

**Commentary:**

The Rural Horticulture Zone is proposed to replace the current Primary Production Zone. In general the new zone is considered to be a suitable replacement. This proposed zone includes areas both to the west and east of Port Wakefield Road which is supported. The zone improves the planning policies for intensive primary production of the nature that is visible throughout the Virginia horticulture district such as greenhouses. Specific concerns have been detailed below:

- The Value-adding (Virginia) DPA has been supported by Council in order to help facilitate the expansion of a major potato and onion processing plant at the corner of Angle Vale Road and John Road, Virginia. The DPA proposes to establish special policies in a policy area within the current Primary Production Zone. The DPA has been through a public consultation phase and staff will provide a formal report to Strategic Planning Committee in March 2020. However, consideration is required in the meantime regarding the means of satisfactorily transitioning the new proposed policies for the site into the Planning and Design Code. The proposed Rural Horticulture Zone

does not adequately accommodate the type of development proposed. It is likely that there will be a need to establish a separate Zone or subzone for the development. There is also a need to avoid the need to repeat the current exercise for developments of a similar nature. This may be possible with changes to Code policy for the Rural Horticulture Zone which would provide sufficient support for expansion of developments of a similarly substantial nature.

- An extensive range of uses is envisaged in the new zone including dwellings, tourist accommodation and transport distribution. These are activities that should not be mentioned in terms of being anticipated in the zone (and is contradictory to the Performance Outcome 1.1) as they have the potential to cause concerns/incompatibility with their presence unless carefully sited. The basic purpose of the zone is 'intensive horticulture' and these have the potential to significantly disrupt horticulture. In the case of transport distribution it should only be ancillary and in association with horticultural uses on the same site. The increased flexibility of the zone enables these activities to be considered under appropriate conditions which need to be adequately included in the Code.
- DTS provision for shops is 100 m<sup>2</sup> (double the current policy of 50m<sup>2</sup>) which is quite a large provision when extended across the whole area, especially when produce sold from the site can be from the region (ie not necessarily from the site).
- Appropriate setbacks for buildings from boundaries appear not to have not been appropriately dealt with (ie for weed and fire control)
- Current policies in the Primary Production Zone include a minimum setback of 300 metres from residential / township type zones where aerial spraying is required – there is nothing equivalent observed in the proposed Code. There also appears to be nothing equivalent to replace the current Development Plan minimum of 1000m separation distance for intensive animal keeping.
- Animal and horse keeping policies do not include policies for specific structures or stocking rates.
- A major concern is to not include land division as Restricted development and to only have shops above 250m<sup>2</sup> as restricted.
- A major concern is to not have any reference to dwellings in the Flood hazard overlay which applies to significant areas related to the Gawler River (which only refers to buildings housing vulnerable people and does not include dwellings as an example - the elderly and disabled frequently live in dwellings) or to refer to the hazard levels 1,2 and 3.

Infrastructure Zone

Infrastructure (Airfield)  
Zone

Infrastructure (Ferry  
and Marina Facilities)  
Zone

Innovation Subzone

## Innovation Zone

### **Recommended Action /Change:**

- 1) Change the Innovation zone by increasing the 500 square metre Restricted development limit to enable the ability to expand shopping development in the precinct (to acknowledge the incorporation of a former Neighbourhood Centre with a significant range of shops in the zone).
- 2) Include appropriate policies in a subzone (or other appropriate means) such as protection of the helipad from excessive building heights, development of a mainstreet on Haydown Road and the medium density residential interface.

### **Recommend agreement with proposed transition:**

- 1) In general the zone transition from Suburban Activity Node to Innovation Zone for the Health Precinct is considered satisfactory subject to matters including those raised above.
- 2) The transition of portions of the Regional Centre to Innovation Zone is satisfactory.

### **Commentary:**

The proposed new Planning and Design Code Innovation Zone will apply to three areas within the City. These areas are the Playford Health Precinct and two areas within / adjoining the Elizabeth Regional Centre (CBD).

#### Playford Health Precinct

The new Innovation Zone, which is specific to the Playford Health Precinct is generally considered to be a suitable replacement for the current Suburban Activity Node (SAN). It should be noted that the Innovation Zone is only proposed to replace the Health Precinct and not the Curtis Road Centre in Playford Alive which is proposed to be Suburban Activity Centre.

The Desired Outcome (DO) for the new Innovation Zone is a better reflection of what is desired around the Lyell McEwin Hospital than the current SAN Zone. The current policy area provisions of the SAN Zone are adequately reflected in the Innovation Zone. It should be noted however, that Council has recently approved a Development Plan Amendment (and is awaiting consideration by the Minister for Planning) which will change the current policies. While the new extended zone boundary will no doubt be implemented in the Code, the new DPA policy may not and where there are significant missing elements they should be incorporated.

The most substantial change is the new restricted development provision for shops of 500m<sup>2</sup> or greater. The current zoning replaced a Neighbourhood Centre Zone which was absorbed into the SAN Zone – this provided the opportunity for a larger supermarket for example and this ability was continued into the SAN Zone. While there is likely to be a small supermarket included as part of the shopping centre redevelopment, it would be appropriate to provide the flexibility for a larger supermarket if there is the demand (given that the current SAN has replaced the Neighbourhood Centre Zone).

It may be appropriate to advocate for a subzone to include certain policies, for example the protection of the helipad from buildings with excessive heights in close proximity (given that Building near airports overlay does not apply to the helipad), and the development of Haydown Road as a mainstreet with activated frontages with canopies and verandahs. Other significant matters include the need to include the residential interface along Broughton Road, the reference to iconic buildings, EPA policies relating to the Industry Zone to the west and the need for pedestrian connections in key locations. Some of these matters would have been addressed through a concept plan if this were allowed.

Sites adjacent Regional Centre

The proposed transition from Regional Centre to Innovation Zone is proposed to apply to the area including the TAFE and NSS to the north of Winterslow Road. The selected zone is suitable and applies to a broad range of appropriate uses. The zone also applies to the area incorporating Playford International College and Kaurna School. The zone does not allow greater than 500 square metres of shops (above 500 square metres is Restricted development) and therefore would not allow supermarkets beyond the core of the centre which is appropriate in order to focus more intense retail activity in the core of the Elizabeth Centre.

Intensive Horse Establishments Subzone

Intensive Rural Enterprise Zone

Main Street Subzone

Master Planned Neighbourhood Zone

**Recommended Action /Change:**

- 1) Amend Overlays and Deemed to satisfy provisions in the new Zone to reduce the extent to which the policies unnecessarily remove development from deemed to satisfy pathways for regularly anticipated forms of development and minor departures from policy.
- 2) Include an overlay for high voltage electricity infrastructure in a similar manner to those for high pressure gas lines.
- 3) Reinforce the ability to implement concept plans with additional policy and in particular the ability to manage the location of new centres.
- 4) Reinforce the ability to ensure that shopping development is focused in centres.
- 5) Reword public notification requirements to reduce the extent of public notification in unnecessary circumstances where there are unlikely to be significant concerns.

**Recommend agreement with proposed transition:**

In general the transition from Suburban Neighbourhood to master-planned Neighbourhood Zone is endorsed subject to those matters highlighted above.

**Commentary:**

The main growth areas within the City of Playford are currently located within the Suburban Neighbourhood Zone of the City of Playford Development Plan. The current zone is proposed to be replaced with the Master-planned Neighbourhood Zone. The majority of new development in Playford will be likely to take place in this proposed zone and therefore substantial effort has gone into comment on this zone.

The Playford growth areas will be one of the major areas where the new zone will be applied in Greater Metropolitan Adelaide, so there is a

potential opportunity to significantly influence the proposed policies of the new zone.

#### Overlays

- 1) Overlays have the potential to substantially increase the workload in many cases by unnecessarily removing consideration of development as 'deemed to satisfy' (DTS). The application of Overlays as 'exceptions' to specific classes of development in the deemed to satisfy pathway should be reconsidered. Instead, consider DTS/DPF provisions to ensure that anticipated classes of development can proceed as a deemed to satisfy development provided they do not impact/offend.
- 2) The Major Transmission Infrastructure Corridors with high voltage electricity infrastructure have not been included in the Code transition. They are included on the current development *Overlay Map Play/5 Development Constraints* and should be included in the Code as an Overlay in a similar manner to the inclusion of high pressure gas lines.

#### Concept Plans

- 1) Review policies that guide the implementation of Concept Plan outcomes with a view to including additional policies either at the zone level, or alternatively policies to assist in the interpretation of the Concept Plan within the Technical and Numerical Variations (TNVs) (eg similar to the land division policies applying to the Angle Vale township which includes additional policies on the page following the Concept Plan).
- 2) Transition existing *Concept Plan Map Play/32 (Buckland Park)* to the Code as this map still retains a function to guide development. As suggested above, guiding policies should also be retained to give this map context and 'meaning'. Review inclusion of additional concept plans where they help to guide policy.

#### Anticipated Land-uses

The transition to the Code for the Master-planned Suburban Neighbourhood Zone needs to manage the location of new centres throughout Growth areas. Considerable thought was given to the development of centres in the structure planning undertaken for the growth areas and this thinking was translated to concept plans. As discussed above the concept plans need to be provided additional weight through additional policy. It is considered that the Code needs to more closely transition current policies which identify preferred locations for activity centres, while acknowledging that such centres may not in all cases be able to be delivered and therefore providing for alternate opportunities. It is considered that 'activity centre' should be defined and included in the administrative definitions. Additionally, the following minor change should be included:

Reword DTS/DPF 3.5 of the Assessment Provisions for the zone to state:  
Non-residential development:

- a) Does not exceed 250m<sup>2</sup> in gross leasable floor area; or
- b) Is established within activity centres that have a combined gross leasable floor area of at least 1500m<sup>2</sup>.

#### Activity Centres

Consider the reintroduction of the policy content of current Suburban Neighbourhood Zone PDCs 29 and 30 (or similar) including amendments to reflect current circumstances to provide guidance on the anticipated size of activity centres based on their location.

This could be achieved by including a DTS/DPF for PO 3.2 in the new zone and retain the anticipated floor areas as TNVs to be applied spatially. For example PO # *'Activity centres should result in total floor areas in the order of those specified in the Anticipate Activity Centre Floor Area Technical and Numerical Variation Overlay.'* Alternatively this could be a standalone policy.

Hazards – Site Contamination

In order to improve the identification of known contaminated sites an Overlay or a Concept Plan could be applied.

Hills Face Zone interface

Current Development Plan policies include reference to establishing policies to setback development close to the zone boundary. An additional policy in the new Code is recommended, referring to allotments that abut the Hills Face Zone. This could be drafted as follows: *PO# Development that abut the Hills Face Zone should be of a sufficient size and shape to accommodate dwellings with appropriate setbacks from the Zone boundary and include suitable landscape buffers. DTS/DPF # Built form is to be setback a minimum of 40 metres from the Hills Face Zone boundary and include a landscaped buffer of not less than 10 metres in width along the Hills Face Zone.*

Public Notification

Reword the Procedural Matters section relating to Notification of Performance assessed development as follows: *All classes of performance assessed development are excluded from notification except where it involves any of the following:*

- a. *Non-residential development on land adjacent land approved to be used by a more sensitive receiver.*
- b. *Development identified as 'all other code assessed development' in Master-planned Suburban Neighbourhood Zone Table 3*
- c. *Non-residential development that does not satisfy DTS/DPF 3.5, 3.6, 3.7 or 3.8.*

Medium-High Intensity Subzone

Nairne Redevelopment Subzone

Open Space Zone

**Recommended Action /Change:**

- 1) Amend legislation to ensure that the Native Vegetation legislation is triggered by the consideration of development in the Open Space Zone as it is in the current Metropolitan Open Space System (MOSS) Zone.
- 2) Ensure that current context in the MOSS zone is not lost, for example the desire to create a continuous linear Park and shared cycle/walkway along the Gawler River.
- 3) Replace the current provision which required the provision of 100 metre strip adjacent the Gawler River to help create a corridor.
- 4) Do not apply this Zone to the area within the current Regional Centre / adjacent the proposed Elizabeth Urban Activity Centre.

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

**Commentary:**

The zone is generally an appropriate transition of the Development Plan MOSS (Metropolitan Open Space System) Zone and Open Space Zone into the Planning and Development Code with some notable/serious flaws. It is notable that many specific references to watercourses have been removed and replaced with controls in the General Provisions and/or Overlays (including the Native Vegetation Overlay).

It is important context for consideration of development applications, that in replacing the MOSS (Metropolitan Open Space) Zone, the Open Space Zone is being applied to areas such as Gawler River where it is the intention to develop a linear park with construction of shared cycle/walking trails. Without this understanding other policies lose their context and emphasis so there is a need to ensure appropriate policies are included.

Notably, there does not appear to be a replacement provision for the current requirement when land is divided adjacent the Gawler River for a strip of land not less than 100 metres wide (measured from the centre line of the River) to be set aside as reserve. This should be carried into the new Code to ensure that this corridor can be completed.

While proposed policy does not provide support for non-open space land uses (eg dwellings) which are currently non-complying, this restriction has been removed in the new Code thereby creating a potential additional assessment for the Council where previously it could refuse to proceed with the assessment. Policies need to be reinforced.

The Open Space Zone in the current Development Plan was established for the Buckland Park development. The current Zone includes a restricted recreation policy area 19 (adjacent the Deferred Urban Zone) as a result of its location near the Jeffries composting operation which has odour implications and a concept plan map (Play/32). The new zone does not include the restrictions in the current policy area and the concept plan which should be carried across to the new Open Space Zone.

It is also noted that a small section of the Open Space Zone is proposed to replace the current Regional Centre Zone and Open Space Precinct in the area in front of the Civic Centre and Police / Courts precinct. The Urban Activity Centre Zoning is a preferred transition.

Change in Zone name

A serious flaw which has been identified is that the change in Zone name to Open Space Zone from MOSS Zone, means that the Native Vegetation Act 1991, which refers specifically to the MOSS Zone (Part 1, 4 (2) (a) of the Native Vegetation Act 1991) will no longer apply to many urban parcels currently appearing in the Native Vegetation Overlay.

The Native Vegetation Branch has confirmed these concerns that, as things currently stand, the zone name change will trigger those parcels to lose protection under the Native Vegetation Act even though they currently appear in the Native Vegetation Overlay. A change like this would seriously weaken the ability to retain, protect and enhance important remnant vegetation on public and private land within our urban areas and undermines the intent of the original zoning and related

legislation. It's our understanding that the implication of this name change was not intended and we ask that urgent amendments are made to ensure continued protection of vegetation within these parcels under the Native Vegetation Act 1991 when the Code is introduced on 1 July 2020. Similar comments apply to the Native vegetation overlay.

Consistent with the above comments relating to the proposed zone name change from MOSS zone, the Native Vegetation Overlay (used in the Open Space Zone) is ineffective without it being triggered by the MOSS zoning.

## Recreation Zone

### **Recommended Action /Change:**

- 1) Ensure that a broader range of facilities including emergency services, entertainment, cultural and exhibition, spectator and ancillary administrative facilities, including this facilities at the Elizabeth Oval, are supported by the Recreation Zone.
- 2) Amend the 50 metre Deemed to satisfy setback. In the Playford context this would be likely to remove considerable development from the Deemed to Satisfy pathway.
- 3) Ensure the existing motorsport facilities are supported in the Recreation Zone.
- 4) Provide support for the retention of native vegetation within the zone.

### **Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

### **Commentary**

The Recreation Zone in the current Development Plan is being transitioned to a zone with the same name. The new zone is broad in its application, and for general sports grounds is generally an appropriate translation. Notwithstanding this, within Playford there are a number of significant concerns.

The introduction of a 50m setback in the Deemed to Satisfy (DTS) provisions is likely to exclude most buildings associated with community sports and recreation facilities.

More importantly, the new zone removes the existing references to non-sporting recreation land uses including emergency services facility, entertainment, cultural and exhibition facilities, spectator and administrative facilities ancillary to recreation development and swimming pools.

The Elizabeth Oval complex is entirely unsupported by the new zone which does not recognise its existing community, function and entertainment facilities.

The new zone fails to include existing provisions that allow for the maintenance of the integrity and development options for Adelaide International Raceway and Speedway Park.

It is also noted, that because of the wide ranging application of this zone that there are in the Playford context, some areas of natural vegetation which warrant retention. This is for various reasons including for tree canopy cover and their contribution to the amenity of increasing dense urban environments. There is a need to ensure that policies support the retention of these areas where practical given that the native vegetation

overlay is not applied.

Remote Areas Zone

Residential Aviation  
Estate Subzone

Residential  
Neighbourhood Zone

**Recommended Action /Change:**

Reduce the range of development such as residential flat building, retirement facility, shop, office and educational facility which are included as activities anticipated in the Zone which under current zoning is effectively a buffer zone.

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

**Commentary**

The Residential Neighbourhood Zone is proposed to replace the current Development Plan Suburban Neighbourhood Zone for a corridor of land along Dalkeith Road in Munno Para Downs. Rural Interface Policy Area 22 also currently applies and varies the current zoning to create a minimum allotment size of 1200 square metres with the intention of creating a buffer to the primarily rural land on the opposite side of Dalkeith Road. This replacement is generally considered to be satisfactory subject to some minor adjustments.

The proposed application of an overlay in the new Code in conjunction with the Residential Neighbourhood Zone limits the lot size to 1200 square metres. The frontage is also limited by an overlay to a minimum of 20 metres.

It is noted that forms of development such as residential flat building, retirement facility, shop office and educational facility have been included as desired forms of development. These should be excluded to be consistent with the intention of this area as a low density interface which would help to protect the farming areas opposite on Dalkeith Road. These facilities would be appropriate and accessible in the adjoining Masterplanned Neighbourhood Zone.

The only form of Restricted Development is a Shop if it is larger than 200 square metres. As mentioned elsewhere there is a need to expand the number of forms of restricted development in order to exclude a greater range of developments.

Residential Park Zone

**Recommended Action /Change:**

Reduce the potential for establishing shops to a restricted development size of 500 square metres.

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

Resource Extraction Zone

**Commentary**

Overall, the zone is close to a literal translation of the Development Plan Zone into the Planning and Development Code Zone. The most notable difference is the increase of allowable shop from 150 square metres to 1000 square metres (restricted development above this size). This maximum floor area does seem excessive and could be reduced to say 500 m2.

**Recommended Action /Change:**

- 1) Introduce policies requiring reduction of scarring of land in scenic or highly visible areas
- 2) Introduce policy that seeks to reduce interface conflict, for example with adjacent horticulture.
- 3) Enable caretaker/workers accommodation

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

**Commentary**

The Resource Extraction Zone is generally considered to be a suitable replacement for the Mineral Extraction Zone. The new Desired Outcome (DO) for the zone better reflects the broad nature of resource extraction (i.e. not limited to mining activities). While the current Mineral Extraction Zone includes policies that recognise the need to protect existing horticulture/agriculture within the adjoining Primary Production Zone and to minimise visual impacts, the new 'simplified' policies would provide adequate guidance.

The key matters that require further consideration include:

- Policies to minimise land scarring, particularly in more scenic areas (i.e. landscape buffers);
- Policies that recognise interface conflicts between horticulture/agriculture and resource extraction – right to farm;
- Possible inclusion of policy to allow for caretaker / workers accommodation

Rundle Mall Subzone

Rundle Street Subzone

Rural Zone

**Recommended Action /Change:**

- 1) The Rural Zone should not be applied to the Virginia Nursery site which requires site specific policies and was the subject of a DPA in

2015. The site requires specific policies developed to provide a solution in line with the current policies.

- 2) The Rural Zone should not be applied to the Renewal SA land in Macdonald Park adjacent NEXY and the site should be part of the adjacent Rural Horticulture Zone, which would be consistent with the current zoning of the site.

**Recommend opposition to the proposed transition:**

The Rural Zoning of two sites in Playford should not proceed

**Commentary**

The Rural Zone is proposed to apply to two relatively small areas of land in the City of Playford. Both of these are considered to be inappropriate transitions.

Virginia Nursery site

The Rural Zone replaces the current Primary Production Zone and Policy Area 1 for the Virginia Nurseries site. The balance of the Primary Production Zone is being transitioned into the Rural Horticulture Zone.

The proposed Rural Zone poorly reflects the existing land use and does not include any of the former Policy Area provisions developed specifically for the site. It is not an appropriate transition. The current policy area provisions were specifically developed to deal with a range of concerns that had developed over a long period of time with the Virginia Nursery site and included substantial legal action and enforcement proceedings. The current policies allow for the ongoing development of the site within an agreed framework and was the culmination of substantial efforts on the part of the City of Playford and Virginia Nursery.

Given the bespoke nature of the current zoning which was designed specifically to cater for the unique circumstances of the Virginia Nursery it is not considered that the current range of zones will cater for the circumstances, and there is a need to discuss an alternative approach. The alternatives could include a subzone designed to specifically carry over the current policies.

Renewal SA land

The Rural Zone is also proposed for a site owned by Renewal SA in Macdonald Park adjacent the NEXY which is currently Primary Production Zone. Renewal SA is of the view that the land should be Rural Horticulture which would be contiguous with the adjacent Rural Horticulture Zone. This is considered to be a reasonable proposition. There does not appear to be any justification for the Rural Zone being proposed for this area.

Peri-Urban Zone

**Recommended Action /Change:**

- 1) Support increases in development opportunity within the zone, while indicating some concern about the potential for increased polluted run-off from development which may have water quality implications within the zone.
- 2) Consider the potential for increasing the forms of Restricted development.
- 3) Express concern about the zone name which may indicate urban development potential which is not the primary function of the zone.

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

### **Commentary**

The current Primary Production (Mount Lofty Ranges) Zone and Watershed Protection (Mount Lofty Ranges) Zone is proposed to be replaced by the Peri-Urban Zone. The primary impact of this Code transition is the loss of explicit Zone level policy reinforcing the importance of water quality protection. Whilst much of this has been moved into a number of General Provisions (eg Beverage Production in Rural Areas) or Overlays (eg Water Protection Area, Water Resources and Mount Lofty Ranges Catchment (Area 1) Overlays) – the current zoning focus on primary production and water quality is lost and replaced instead with a focus on both farming and non-farming value adding opportunities, development that expands the economic base and promotes its regional identity. The name of the zone is a concern as it unintentionally portrays the possible future intent to allow the zone to develop in a manner which approaches being urban in nature, where this is not the intention.

The Peri-Urban Zone seeks to create local conditions that support new and continuing investment while seeking to promote co-existence with adjoining activities and mitigate land use conflicts – which moves away from the primary intent of the current zone which seeks to curtail development other than primary production, preserving natural and rural landscapes and water quality. The potential for increased levels of economic development is supported given the difficulty in finding opportunities under current zoning. However, it is unclear what impact this may have on the quality of run-off in watershed areas when applied with varying levels of compliance across the Greater Metropolitan Area.

Given that the Peri-Urban zone will apply widely throughout the State, this is understandable, however in the case of the Watershed Protection (Mount Lofty Ranges) Zone, the shift is marked and relies almost entirely on the application of Overlay and General policies to replace the current zoning policy which is more general in nature.

The biggest practical impact is that both current zones have the benefit of significant levels of non-complying development. This provides Council with strong mechanisms to prevent incompatible development. Under the Peri-Urban Zone, very little development is restricted with only Dairy, Intensive Animal Husbandry in the Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay, Land Division, Landfill, some larger shops, Stock sales yard, Stock slaughter works, Special industry and Windfarm restricted.

Notably, whilst wineries are contemplated in the existing zoning, additional beverage production (eg breweries and cideries) are now also explicitly contemplated. This is considered to be appropriate as they complement wineries, albeit that similar environmental restrictions are intended to apply.

The shift in Zone focus is likely to create additional development assessment requirements and most likely compliance to ensure that development does not create any significant environmental (particularly water quality) concerns.

**Recommended Action /Change:**

No changes recommended

**Recommend agreement with proposed transition:**

In general the transition is endorsed.

**Commentary**

The Rural Living Zone is being transitioned to the zone of the same name in the new Code. The zones are similar and carry over the same minimum allotment sizes for the three areas affected in Virginia (1ha), Macdonald Park (1 ha) and Craigmore (4000 m2) without these being restricted development (they are currently non-complying). Overall, the zone is close to a literal translation of the Development Plan Zone into the Planning and Development Code Zone. The most notable difference is providing the potential for development of non-residential uses in the form of small-scale commercial uses including offices, shops and consulting rooms. Restaurants and shops above 200 square metres are restricted developments. The guideline policies suggest that these forms of development should be no more than 100 square metres in area.

Typically Rural Living Zones throughout the State have accommodated ancillary and associated use, usually in the form of small scale, non-residential uses and shops, consulting rooms, offices and light industry remain contemplated development provided it is of a scale that does not adversely impact the semi-rural or semi-natural residential character and amenity of a locality. Enabling the development to be considered on merit (exclusion of a restaurant from restricted development) may lead to increased traffic, amenity impacts and waste water complications.

Notwithstanding this, a restaurant would still need to meet the size requirements, demonstrate the management of any potential impacts, show a link to use of the land and meet all other qualifications for non-residential development in the Zone. On this basis, a small café that showcases produce grown on the site (e.g. Olives) may be appropriate and should not be restricted development. It is noted that such developments would only likely be approved in limited circumstances.

Given the allotment sizes and requirement for non-residential development to remain ancillary, small scale non-residential activity (eg small scale shops and consulting rooms) is not likely to adversely impact the semi-rural or semi-natural residential character and amenity of these areas.

Rural Settlement Zone

Rural Shack Settlement Zone

Small-scale settlement Subzone

Soft-edged  
Landscaped Subzone

Specific Use  
(Motorsport Park) Zone

Specific Use (Tourism  
Development) Zone

Suburban Activity  
Centre Zone

**Recommended Action /Change:**

- 1) Virginia Centre should transition to the Virginia Mainstreet Zone and not to the Suburban Activity Centre Zone
- 2) The current Town Centre Zone at the corner of Main North Road and Anderson Walk should transition to the Suburban Employment Zone.

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

**Commentary**

There are a number of centres throughout Playford proposed to be transitioned to Suburban Activity Centre (SAC). The SAC replaces lower order centres with existing zoning such as neighbourhood and local centres and also includes the proposed Buckland Park Centre which currently has District Centre Zoning.

Generally the proposed transition to SAC is appropriate and is supported with the following exceptions:

- The Virginia Centre is proposed to transition to the SAC. The mainstreet of Virginia which is currently zoned Town Centre, has more of a feel of a mainstreet environment than it does a typical suburban centre. The Township Mainstreet Zone is the proposed zone within the new Code which appears most suited to this environment. The proposed streetscape upgrade is also taking the Virginia Centre in this direction (toward continued development of a mainstreet).
- The current Town Centre Zone at the corner of Main North Road and Anderson Walk is proposed to be transitioned to SAC. The SAC is intended for typical suburban centres which often include supermarkets and a variety of supporting specialty shops. The Anderson Walk location has not developed as a suburban centre and given the dominance of the surrounding centres (Munno Para, Blakes Crossing and Curtis Road) is unlikely to do so. The zoning in this locality should support the development of a diversity of relatively small scale business, commercial and retail activities. The Suburban Employment Zone is recommended as the appropriate zone for the transition.

Suburban Business  
and Innovation Zone

## Suburban Employment Zone

### **Recommended Action /Change:**

- 1) Indicate concern about the potential of the increased capacity to develop shops (Code includes 1000 square metre shop Restricted development limit). Recommend a decrease in the Restricted development levels to 500 square metres for shops, with a guideline maximum of 250 square metres.
- 2) Recommend that the current 1500 square metre limit on shops in the Mingari Street Commercial Zone should be carried across to the Code as a Restricted development limit.

### **Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

### **Commentary**

The Suburban Employment Zone is proposed to replace two current Development Plan Zones. These zones are the Light Industry Zone and Commercial Zone and they are located throughout the City. The proposed replacement zone provides greater flexibility than either of the current zones to accommodate either commercial or industrial types of activities. The new zone potentially provides the capacity for a mix of activities, which can occur in localities such as those which have been selected, and allow for easier evolution/change of land uses as circumstances change, which is positive.

On the negative side it may be more difficult to ensure a high amenity than it would be through seeking commercial development in a commercial zone (particularly on main roads), rather than light industry which can often be less attractive. There are also potential implications from additional retailing and commercial development on main roads. It is noted that the Restricted Development limit (maximum) is 1000 square metres, with a guideline maximum of 500 square metres for shops. The current non-complying maximum under the Light Industry Zone is 250 square metres. The current Commercial Zone has a non-complying limit of 250 square metres, except for the Mingari site where there is a 1500 square metre guiding limit.

### Suburban Employment Zone to replace Light Industry Zone

The current Light Industry Zone is located as follows:

- John Rice Avenue (opposite Lionsgate), Elizabeth South
- Phillip Highway (opposite Lionsgate), Elizabeth South
- Angle Vale Road / Northern Expressway, Angle Vale
- Curtis Road (southern side), Smithfield
- Bishopstone Road (Council POC site), Davoren Park

The most significant implication of the proposed transition from Light Industry to Suburban Employment is the potential for additional commercial / shopping development, particularly along the main road frontages of these areas such as John Rice Avenue, Phillip Highway and Angle Vale Road. Ordinarily with zoning changes of this nature there would be assessment of the traffic implications and the potential impact of additional retail/shopping development. In this case this type of analysis has not been undertaken and therefore the potential impacts are not fully understood. It can be assumed that there will be an incremental increase in the traffic directly entering/exiting these roadways which could create additional congestion on arterial roads. There would also be potential for the increased dispersal of shopping/retailing along main roads which could have medium to long term implications for the vitality and continued development of some existing centres such as the Regional Centre (CBD), Elizabeth South Centre and Elizabeth Vale (in the Health

Precinct). The alternate position is that there would be additional consumer choice and competition.

#### Suburban Employment to replace Commercial Zone

The current Commercial Zone is located as follows:

- Mingari Street site (corner Main North Road, former Bowls Club), Munno Para
- Curtis Road (northern side in Playford Alive development), Munno Para
- Curtis Road (cnr. Frisby Road, occupied by Bunnings), Angle Vale

##### 1) Mingari site

In regard to Mingari Street the proposed transition to Suburban Employment is generally reasonable. The most significant change is in regard to the potential for development of shops. Retail Floor space is currently limited in the Development Plan Commercial Zone to 1500 square metres which applies to the whole of the site. It is noted that a 1000 square metre maximum is imposed under the proposed Code, but this will apply for each shop (with potential to divide the site into several allotments). Council's original intent was to limit the size of shopping on this site so that it does not develop into a centre zone / neighbourhood centre.

However, it is possible for the site to be divided or for multiple shops smaller than 1000 square metres to be established. It is recommended that the 1500 square metre limit for the current site is retained/carried across to the Code through appropriate means, for example through a Technical and Numerical Variation. This would avoid the site developing into a Neighbourhood Centre style development. It was a deliberate decision of Council following independent analysis of the circumstances applying to centres and shopping in the area to avoid the development of another Neighbourhood Centre on this site.

##### 2) Curtis Road (northern side in Playford Alive Development)

The transition for this portion of the Playford Alive Development is generally considered to be reasonable. However, the potential for development of a retail/commercial strip along Curtis Road and the consequent potential traffic issues is a concern. This concern is mitigated to some extent by the current ownership by Renewal SA which has an interest in looking after the public interest. However, it should be noted that ownership of land will be likely to change at some stage, whether before or after the development of this area.

##### 3) Curtis Road (Bunnings site adjacent NEXY)

The transition for this portion of the Playford Alive Development is considered to be reasonable. As discussed above there may be some potential for retailing on portions of the site which have not been developed for the Bunnings development with this transition which would not have been allowed for under the current Commercial zoning.

#### Suburban Employment to replace District Centre

The transition for the majority of the Munno Para District Centre is discussed under the heading 'Urban Activity Centre'. The southern portion of the centre is proposed to be transitioned to Suburban Employment. The transition is considered to be reasonable and consistent with the direction of the current zoning and existing development of this portion of the Munno Para Centre site on Main North Road.

Suburban Main Street  
Zone

General Neighbour  
hood Zone

**Recommended Action /Change:**

- 1) Increase the range of restricted development in the zone.
- 2) Refine public notification triggers to avoid notification of unnecessary forms of development
- 3) Refine overlays to avoid unnecessarily tripping development out of Deemed to Satisfy.

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

**Commentary**

The General Neighbourhood Zone is the replacement Zone for the current Residential Zone proposed in the transition to the Code.

Predominantly the General Neighbourhood Zone encourages low residential densities with low site coverages, generous setback and development of low-rise suburban character consistent with the current Residential Zone. The majority of current zone objectives and policies are addressed either through zone provisions or the General section of code. Specific policy for precincts 27 & 28 of the current zone is not provided, however this is not seen as a significant departure from current policy in that limited precinct specific policy is provided in the Current Development Plan.

Site areas and frontages for various forms of dwellings are largely consistent or moderately exceed current Development Plan Provisions. The Zone is subject to TNV's which replicate current Development Plan Provisions relating to building heights

A greater range of housing choice is proposed for the zone. Residential flat buildings and group dwellings are envisaged which may lead to higher density of developments. Increases in density in the suburbs overall would be a slow incremental process as redevelopment/renewal occurs, however this will be driven by market demand. Less policy importance is placed on protection of low density residential development from non-residential land uses in place of value adding / improvement of services to the community which appears to be given more weight (and is a general emphasis of the Code).

Office, shop and consulting room have moved from non-complying for the current zone to an envisaged form of development- likely to lead to increases in changes of use to office and consulting room uses given the lower rents, costs and higher parking availability in residential areas. Restrictions are introduced regarding maximum floor areas which will limit larger non-residential development. This may result in some relatively minor interface concerns and places a higher level of responsibility on planning staff to deter non-compatible land use.

There is concern regarding public notification triggers for developments that do not meet minimum allotment or frontage requirements. This is onerous when compared to current policy and notification triggers.

Suburban  
Neighbourhood Zone

Supported accommodation no longer triggers notification, however this is considered a practical outcome to ensure that there is the ability to accommodate this form of development throughout the suburbs.

The non-complying list has been removed from Zone, but the General Neighbourhood Zone has some policies which would make these forms of development generally difficult to support due to their size, intensity and/or impact to the residential amenity on the zone. The loss of non-complying development types may make some forms of development more difficult to discourage prior to lodgement.

Due to the overlays, especially Building near Airfields Overlay, some development will not be considered as deemed-to-satisfy. As discussed elsewhere, overlays could be refined to ensure that some forms of development are still able to be considered as deemed to satisfy.

**Recommended Action /Change:**

- 1) Increase the range of restricted development in the zone.
- 2) Refine public notification triggers to avoid notification of unnecessary forms of development
- 3) Increase the side setbacks to a level consistent with the current policies

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

**Commentary**

The new Suburban Neighbourhood Zone is proposed to replace the current Residential Hills Zone on the eastern side of the City of Playford adjacent the Hills Face Zone to the east of Main North Road. The new Zone has complementary goals for the future development of the zone with some specific variations that are discussed below. It should be noted that the Suburban Neighbourhood Zone does not replicate the current Development Plan Suburban Neighbourhood Zone.

As with much of the Code policy across the city there is a relaxation in terms of the ability to establish retail and commercial development. The implications for this within the Residential Hills Zone are not likely to be substantial given limited direct exposure to major roads. However, there may be an increase in small scale office and commercial development that is not as reliant on substantial exposure to traffic. This is considered to be acceptable.

It is noted that secondary (side road) setback is less generous than the current provisions and in a low density zone it would be appropriate to make adjustments to these proposed code policies.

There is currently an extensive list of non-complying development for the Residential Hills Zone. The replacement Zone includes only 'Shop' greater than 1000 square metres as Restricted development. It is considered that the Restricted list of development should be expanded to include additional forms of development. Alternatively a policy could be included to refer to forms of development that are generally not considered appropriate within the zone. This has the advantage of enabling these forms of development to still be considered on merit if there is appropriate justification.

Public notification is a concern that is dealt with as a separate issue

elsewhere.

## Housing Diversity Neighbourhood Zone

### **Recommended Action /Change:**

1) Replace The Housing Diversity Zone with the General Neighbourhood Zone in the suburb of Elizabeth Grove. Noting that the zone is to be retained in other very limited localities, including on the site of the former Elizabeth Grove Centre.

### **Recommend agreement with proposed transition:**

The transition is endorsed subject to the matters raised above.

### **Commentary**

The Housing Diversity Neighbourhood Zone is proposed to replace the Current Residential Regeneration Zone only in the relatively small area and suburb of Elizabeth Grove. The current Residential Regeneration Zone is a 'remnant' zone which has been removed in the remainder of Playford. It formerly applied in parts of Playford Alive regeneration was intended but was replaced several years ago without any noticeable negative impacts.

Elizabeth Grove is very similar in character, for example allotment size, to other suburbs of Elizabeth which are mainly former SA Housing Trust suburbs.

The proposed residential density of the Housing Diversity Zone is up to 70 dwellings per hectare which is considered likely to contribute to an inner urban character which is not compatible with the desired character of this area. The proposed policies for the General Neighbourhood Zone, will still promote the gradual redevelopment of the Elizabeth Grove area, together with other areas it would apply to, but at more compatible densities.

The Housing Diversity Zone also applies to a number of very small localities adjacent to suburban shopping facilities (including a small area in Elizabeth Grove), where higher densities are already proposed by current Council policies. In these limited circumstances the proposed zoning is appropriate.

## Township Zone

### **Recommended Action /Change:**

- 1) Transition the whole main street area currently shown as Urban Activity Centre to Township Zone
- 2) Remove the transition to Urban Activity Centre in the whole of the township which is clearly inappropriate
- 3) Increase the range of restricted development in the zone.

### **Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above.

### **Commentary**

A small portion of the One Tree Hill Township is proposed to transition to Township Zone from the current zone of the same name. The One Tree Hill township is discussed under the heading Urban Activity Centre. There is an error in regard to substantial areas of the Township and a proposal to transition to Urban Activity Centre. It is recommended that the transition to Township should include the whole of the main street and that there should not be a transition Urban Activity Centre which is clearly not intended for this situation.

There are no forms of restricted development in the Township Zone. As discussed elsewhere there is considered to be a need to expand the range to include those activities that are highly unlikely to be appropriate within the Zone.

Township Activity  
Centre Zone

Township Main Street  
Zone

Underground Subzone

Urban Activity Subzone

Urban Activity Centre  
Zone

**Recommended Action /Change:**

- 1) Transition the Urban Activity Centre Zone to include/replace the areas of the proposed Community Facilities Zone and the Open Space Zone adjacent the Elizabeth Centre (both of the area currently have Regional Centre Zoning).
- 2) Extend the Urban Activity Centre Zone to the north of the current Zoning in Munno Para Centre to include the Spotlight and Aldi sites (remove proposed Community Facilities Zone for this area).
- 3) Remove the entire Urban Activity Zone proposed for the One Tree Hill Township. Replace the UAC with the Township Zone in the main street area, and for the remainder of the area the Residential Neighbourhood Zone should replace the UAC.

**Recommend agreement with proposed transition:**

In general the transition is endorsed subject to the matters raised above

**Commentary**

Transition of Elizabeth Centre (the CBD)

The Urban Activity Centre (UAC) is the proposed replacement Zone for the Regional Centre Zone in the new Code. Notably the UAC Zone also replaces the current District Centre Zoning for the Munno Para Centre, and within the City of Salisbury, the Salisbury City Centre is proposed to transition to an Urban Activity Centre. The Urban Activity Centre is the highest order centre below the Adelaide CBD.

Given the range of zones proposed in the new Code, the transition of the Regional Centre to the Urban Activity Centre is appropriate. The policies applying in the new Urban Activity Centre are similar to those for the Regional Centre, with some notable differences as follows:

Centres Hierarchy

Regional Centres are currently acknowledged as the primary centres outside of the CBD, including their important role with government administration and cultural activities. The Code proposes the partial dismantling of the hierarchy of centres so that Regional Centres and large District Centres have the same zoning and will be called Urban Activity Centres.

It is noted that the proposed Buckland Park District Centre is proposed to transition in the new Code to Suburban Activity Centre. In so far as the zoning of a centre is indicative of status, Elizabeth (the CBD), Munno Para Centre and Salisbury City Centre will have the same status. It is difficult to determine the actual likely future impact of this change in zoning in terms of government and business decision making about location. However, there are advantages in focussing many services and facilities in a location such as Elizabeth where there is a large range of services and facilities in conjunction with good public transport, cultural and administrative facilities to help create a vibrant alternative to the Adelaide CBD. Playford is concerned about de-emphasis of the importance of the Elizabeth Regional Centre. If this proposal is implemented it highlights the potentially important role that Playford will need to play if the Centre is to continue to grow to service a regional community, particularly because 'out of centre' shop development is being more firmly imbedded by the Code.

#### Core of Elizabeth Regional Centre

The Urban Activity Centre in the Code transition is proposed to incorporate only a portion of the area (primarily that which would be considered to be the 'core' of the centre) which is within the current Regional Centre. This would include the main retail shopping centre and the majority of land adjoining Elizabeth Way. Some peripheral areas of the current Regional Centre are proposed by the Code to be included in the Innovation Zone, Community Zone, Recreation Zone and Open Space Zones.

#### Regional Centre to Innovation Zone

The proposed transition from Regional Centre Innovation Zone would apply to areas such as the TAFE and NSS to the north of Winterslow Road. The selected zone is suitable and applies to a broad range of appropriate uses. The zone is also proposed to apply to the area incorporating Playford International College and Kaurna School. It does not allow greater than 500 square metres of shops (above 500 square metres is restricted development) and therefore would not allow supermarkets beyond the core of the centre. This is appropriate in order to focus more intense retail activity in the core of the Elizabeth Centre and consistent with current policy.

#### Regional Centre to Community Facilities Zone

A proposed transition to Community Facilities Zone applies to the allotments incorporating the Civic Centre, Courts and Police Station. The Community Facilities Zone reflects the current policy area over the land as part of the Regional Centre Zone. Given the Council and Government own the land it is unlikely that the broad range of uses in this area will change. The Urban Activity Centre would be an appropriate transition to avoid a zone boundary and notification requirements.

#### Regional Centre to Open Space Zone

This area includes land in front of the Civic Centre and GP Plus (between Main North Road and these facilities). While currently zoned Regional Centre, it currently has an Open Space policy area over it. While the open space policies are not considered to be a major issue, the preferred zoning of this area is Urban Activity Centre.

#### Munno Para Centre

The proposed zoning transition from the current zoning of District Centre to Urban Activity Centre is appropriate given the range of zones available with the following exceptions. The Code proposes a transition to Community Facilities Zone in the area/sites developed with Spotlight and

Aldi supermarket. This is not an appropriate transition and should be included in the UAC given the current retail domination of this area, while the remainder of the proposed Community facilities zone, for example close to the Smithfield Railway Station is an appropriate reflection of the intent of the current zoning and current activities in the location.

One Tree Hill Township

The One Tree Hill Township is proposed to transition in the new Code to UAC. A small section of the township is also proposed to transition to the Township Zone. The transition to Urban Activity Centre is the most surprising of the proposed new zoning proposals and is not an appropriate transition. As discussed above, the UAC is clearly designed for higher order (larger) centres such as Elizabeth and Munno Para. Unusually the transition also proposes that this zone should be applied to a number of sites including Council owned open space and the One Tree Hill primary School site. This transition appears to be an error.

A range of zones have been reviewed from the suite proposed under the new Code in order to propose an appropriate Zone for the main street area of the One Tree Hill Township. The Township Zone is favoured because it is appropriate to the small scale environment of One Tree Hill. This zoning should only apply to the town centre/main street itself (this should include the areas within current Development Plan Precincts 30 and 35). The Residential Neighbourhood Zone (RN) is appropriate for the residential areas adjoining the main street, as proposed in the Code transition. The One Tree Hill School and open space reserve areas should also be included within the RN Zone which can appropriately cater for these activities (and not within the Urban Activity Centre Zone). A 1500 square metre allotment size minimum is proposed for this zone through an overlay which is generally consistent with the large semi-rural residential development of this area and cater for septic systems.

Urban Corridor  
(Boulevard) Zone

Urban Corridor  
(Business) Zone

Urban Corridor (Living)  
Zone

Urban Corridor (Main  
Street) Zone

Urban Neighbourhood  
Zone

Urban Renewal Zone

Viticulture renewal  
Zone



Mixed Use Transition  
Subzone



## Consultation Submission Form

### *Planning and Design Code for South Australia*

Please enter your feedback for general policy

*click next at the bottom of the page for next topic*

Advertisements General  
Policy

Animal Keeping and  
Horse Keeping General  
Policy

Aquaculture General  
Policy

Beverage Production in  
Rural Areas General  
Policy

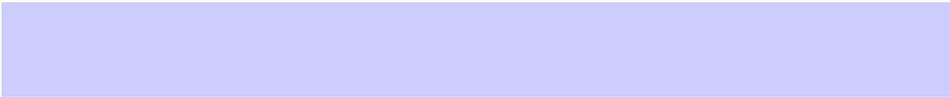
Bulk Handling and  
Storage Facilities  
General Policy

Clearance from  
Overhead Powerlines  
General Policy

Design in Rural Areas  
General Policy

Design in Urban Areas  
General Policy

Forestry General Policy



Housing Renewal  
General Policy



Infrastructure and  
Renewable Energy  
Facilities General Policy



Intensive Animal  
Husbandry and Daries  
General Policy



Interface between Land  
Uses General Policy



Land Division in Urban  
Areas General Policy



Land Division in Rural  
Areas General Policy



Marinas and On Water  
Structures General  
Policy



Open Space and  
Recreation General  
Policy



Resource Extraction  
General Policy



Site Contamination  
General Policy



Tourism Development  
General Policy



Transport Access and



Parking General Policy



Waste Treatment and  
Management General  
Policy



Workers Accommodation  
and Settlements General  
Policy



## Consultation Submission Form

### *Planning and Design Code for South Australia*

Please enter your feedback for Land use Definition

*click next at the bottom of the page for next topic*

Agricultural building  
definition

Ancillary  
accommodation  
definition

Name change from 'dependent accommodation' – no longer implies that the accommodation is for family only, nothing about renting out individually.  
Nothing mentioned about minimum size of land, although if the land is small this may impact on POS and be refused anyway.  
No extra car parking space is required.  
A granny flat with a bedroom and a living room but no bathroom would not fall within this definition – would default to granny flat or another term, may need to be notified/referred (wouldn't be DTS).

Animal keeping  
definition

Aquaculture definition

Defined by other legislation. No comment from Council

Automotive collision  
repair definition

Not restricted in some zones while 'motor repair station' is (Business Neighbourhood Zone).

Bulky goods outlet  
definition

Definition has been copied from Development Regulations 2008. Does not resolve confusion between 'bulky goods outlet' and 'shop'. Shop is restricted development in some zones where as bulky goods outlet is not (Employment Zone).

Caravan and tourist

Well-defined, good that 'short-term' is included in definition. Supported

park definition

by Council

Commercial forestry definition

Commercial forest is defined in Regulations and has similar meaning to commercial forestry definition in new code. Definition supported by Council

Consulting room definition

Cropping definition

Dairy definition

Detached dwelling definition

Replicates existing definition in Development Regulations. Ambiguous definition that does not provide clarity in land use between dwelling typology. Recommend better definition of dwelling types.

Dwelling definition

Replicates existing definition in Development Regulations. Ambiguous definition that does not provide clarity in land use between dwelling typology. Recommend better definition of dwelling types.

Educational establishment definition

Definition has been copied from Development Regulations 2008. No objection from Council

Electricity substation definition

Farming now does not include agriculture, but agriculture is not defined. Farming can only be cropping, grazing or low intensity animal husbandry. Some things may not fall into farming but neither do they fall into horticulture (potatoes?).

Farming definition

Definition has been copied from Development Regulations 2008.

Fuel depot definition

Copied from Development Regulations 2008, but exclusions no longer include service industry (no longer defined, could now be part of light industry).

General industry definition

Group dwelling definition

Replicates existing definition in Development Regulations. Ambiguous definition that does not provide clarity in land use between dwelling typology. Recommend better definition of dwelling types.

Horse keeping definition

Horticulture definition

Hotel definition

Indoor recreation facility definition

Copied from Development Regulations 2008, Council supports that land uses such as gym and yoga studio are now specifically included.

Industry definition

Intensive animal husbandry definition

Landfill definition

Similar to existing landfill depot definition in EPA Act – provides better detail than previous definition and is supported by Council.

Light industry definition

Low intensity animal husbandry definition

Motor repair station definition

Mushroom production definition

Office definition

Organic waste processing facility definition

Outbuilding definition

New definition – generally supported by Council

Personal or domestic services establishment definition

Not previously defined but listed under shop in Dev Regulations – new definition provides clarity and is supported by Council

Place of worship definition

Pre-school definition

Protective tree netting structure definition

Definition has been copied from Development Regulations 2008.

Public service depot definition

Replicates existing- supported by Council

Recreation area definition

Renewable energy facility definition

Residential flat building definition

Replicates existing definition in Development Regulations. Ambiguous definition that does not provide clarity in land use between dwelling typology. Recommend better definition of dwelling types.

Residential park definition

Restaurant definition

Definition has been copied from Development Regulations 2008. Is still included as a shop which creates confusion

Retail fuel outlet definition

Retirement facility definition

Row dwelling definition

Replicates existing definition in Development Regulations. Ambiguous definition that does not provide clarity in land use between dwelling typology. Recommend better definition of dwelling types.

Semi-detached dwelling definition

Replicates existing definition in Development Regulations. Ambiguous definition that does not provide clarity in land use between dwelling typology. Recommend better definition of dwelling types.

Service trade premises definition

Shop definition

Question benefit of keeping restaurant within definition given it has its own definition, especially given increased DTS exceptions for shops in some zone-takeaway restaurants may become DTS applicable.

Special industry definition

Stock slaughter works definition

Stock sales yard definition

Definition has been copied from Development Regulations 2008. Generally appropriate

Store definition

New definition. Generally supported by Council

Student accommodation definition

Supported accommodation definition

Replicates existing definition in Telecommunications Act 1997 and is supported by Council

Telecommunications facility definition

Tourist accommodation definition

Warehouse definition



Wind farm definition



Workers'  
accommodation  
definition



## Consultation Submission Form

### *Planning and Design Code for South Australia*

Please enter your feedback for Admin Definitions

*click next at the bottom of the page for next topic*

AEP (Annual Exceedance Probability)	
AHD (Australian Height Datum)	
Asset protection zone	New definition- supported by Council
Battle-axe allotment	Definition has been copied from Development Regulations 2008, now also includes an illustration which is supported for clarity
Battle-axe allotment	
Building height	
Building level	
Building line	Definition has been copied from Development Regulations 2008. Generally supported by Council
Bushfire buffer zone	

Defence aviation area

Density

Poor definition- equates to net density. Will result in excessively high density to allotment sizes. Requires reworking and reconsideration. Clarify if intended to be gross density

FFL (Finished floor Level)

Gross leasable floor area

Groundwater

Habitable room

Heritage agreement

New definition- needs clarification on net or gross density, otherwise generally supported

High-density

New definition – generally supported when considered with medium and low-rise definitions however definition of levels- i.e. above ground is required for clarity.

High-rise

New definition. Generally supported however clarify if deliveries and servicing are included as part of the hours of operation- are activities generally associated with a land use but often occur early morning/ later at night

Hours of operation

Low-density

Low rise

Medium-density

Medium-rise

Mezzanine

Native vegetation

Replicates existing definition under Native Vegetation Act 1991.

Non-sensitive use

New definition – means everything that is not a sensitive use (defined in EPA Act 1993). Generally supported

Power system

Primary street

Private open  
Space

Proclaimed  
shipwreck

Secondary street

Sensitive receiver

Sensitive use

New definition – supported in encouraging increased greening and supports new plantings and trees. Supported by Council.

Site

Soft-landscaping

South

South facing

Standard sea flood risk level

Tangent point

Terrace arrangement

New definition – somewhat helpful to distinguish between row dwellings and detached dwellings which abut, provisions for row dwellings and terrace arrangements seem to be the same.

Total floor area

Wall height

Waste

Replicates existing definition under Environmental Protection Act.

Council has concern over current definition in that it captures everything i.e. “any discarded, dumped, rejected, abandoned, unwanted or surplus matter, whether or not intended for sale or for purification or resource recovery by a separate operation from that which produced the matter”.

Recommend new code uses includes and excludes columns to better define “waste” such as includes rubbish, sewage, effluent, debris etc excludes by-products, recycled and second hand materials or perhaps come up with a better definition to state waste is unusable material.

## Consultation Submission Form

### *Planning and Design Code for South Australia*

Please enter your general feedback here

#### **Restricted Development in the New Code**

##### **Summary**

Reducing the range of development in the new Restricted development category is supported. However, it is considered that the extent of reduction is an overreaction to the desire to facilitate development throughout the State which will be likely to have some adverse consequences. While lists should be minimised, there is a need to carefully expand the range of development in the Restricted lists in order to ensure that inordinate time is not spent on dealing with development which should be 'turned away' at the counter.

##### **Commentary**

The Planning and Design Code does not retain the current lists of Non-Complying Development for each of the new zones that are part of the Code. In its place is a new category called Restricted Development which also has a different process for consideration of development applications. The current non-complying process substantially involves Council in the assessment process with a concurrence from the State required if Council recommends approval.

The new process for Restricted development does not involve Council and requires approval by the State Government through the State Commission Assessment Panel (SCAP).

This process is part of the delivery on the new objectives of the Planning Development and Infrastructure Act which has a key objective of facilitating development. The State's intention is to deal with what is considered to be excessively long lists and sometimes inadequately considered ranges of non-complying development in current Development Plans which can create a barrier to approval of some developments that may warrant approval under some circumstances.

In general, the minimal lists of Restricted Development are considered to be an overreaction to the objectives of the PDI Act. It would be appropriate for the lists to include a small range of development (with the range dependent on the circumstances applicable for each zone) which is not likely under the vast majority of circumstances to warrant development approval. The disadvantage of this process is that Council is not involved in the consideration of Restricted development. Alternatively, or in conjunction with this a range of development could be included as a performance outcome for each zone to guide the general range of development which is not generally appropriate within the zone. This would help to avoid those forms of development which are clearly unlikely to warrant consideration as development applications and the generation of additional unnecessary applications.

## **People and Neighbourhoods Policy Discussion Paper**

### **Summary**

The timing of release of the discussion paper in conjunction with the consultation on the Code has not provided sufficient time to enable proper analysis and discussion. Some of the ideas included are encouraging, and recognition of the impact of infill development and urban renewal is appropriate.

The paper does however highlight the need for a commitment to ongoing research and review to ensure that improvements will be possible progressively over time. This would allow for careful consideration, engagement and discussion, rather than being allowed to build up and require resolution 'in bulk' as appears to be the case with some issues in the Code introduction.

### **Commentary**

The State Planning Commission released a People and Neighbourhoods Policy Discussion Paper in September 2019, immediately before the release of the Planning and Design Code for consultation. The discussion paper seeks comment by the 28 February 2019 which aligns with the closing date for comments on the Planning and Design Code.

The practical value of the release of the Discussion Paper is diminished by the inability to provide the focus on this document that it deserves due to the need for a primary focus on providing comment on the consultation for the Planning and Design Code. The timing does not enable appropriate discussion and debate of the contents to enable appropriate inclusion of the conclusions and recommendations into the Code, given the extent of the work required to analyse and provide comment on the Code transition. The discussion paper is well presented and relatively concise. However, policy on residential development and development of neighbourhoods on its own warrants detailed debate and analysis over reasonable timeframes before the policy is implemented.

Encouragingly the Discussion Paper acknowledges the impact that implementation of urban renewal and infill housing is having across greater Metropolitan Adelaide and seeks to respond to that. The Discussion paper refers to some of the policy improvements that are being introduced. Examples of this include requirements for tree planting associated with dwellings and water sensitive design policies. However, there are areas of concern in the paper, for example the means of managing or encouraging ancillary accommodation (for example use of back yards to accommodate an additional dwelling) requires very careful consideration (and wide discussion) so as to not create a range of substandard housing that does not comply with requirements that would apply to other forms of housing. The implementation of minimum housing standards as has been adopted in other States and internationally would be desirable to avoid some of the issues that come with more compact forms of housing.

The discussion paper, the broad range of issues that it covers and the need for change, clearly highlights the need for ongoing policy review to be implemented so that in the future changes are made as required rather than being undertaken 'in bulk' together with a major transition of the planning system. There will need to be a major State Government commitment to ongoing policy research and change in order to ensure the Planning and Design Code is properly managed, maintained and implements the 30 Year Plan.

## **Defence Precinct**

There is an opportunity to work with the State Government to identify a suitable area of land within the City of Playford which would be appropriate to develop as a defence precinct. This land would likely be in close proximity to RAAF Edinburgh and Greater Edinburgh Parks.

Although the idea is embryonic at this stage, the Adelaide City Deal was signed in March 2019 and provides the opportunity to pursue the concept further. The City Deal is a ten year partnership between the Australian Government, the Government of South Australia and City of Adelaide. While the City of Adelaide is a signatory to the agreement, the objectives include supporting economic and population growth in areas beyond the Adelaide CBD.

There is potential for Playford to provide opportunities to develop defence industries within the City that would also provide employment and economic development opportunities for the local area and the region.

The implementation plan for the City deal provides a series of milestones and steps that have been agreed to. There are at least two that may provide support to the concept for a Defence Precinct in Playford as follows:

1) Plan for Urban Renewal

Q4 2020 - Identify new growth precincts consistent with the 30 year plan for Greater Adelaide, 2017 Update.

2) Protecting Defence Precincts

Q2 2021 – Review and update planning policies to support defence, industry and commercial clusters and precincts and inform updates and changes to the Planning and Design Code.

This is a matter that will also be pursued independently from the consultation on the Planning and Design Code.

## **Riverlea Development (Buckland Park)**

### **Summary**

There is considerable uncertainty about the future of the Riverlea Development and likelihood of it proceeding. Riverlea was declared a major development and has been rezoned for approximately 10 years. Circumstances have changed since the original rezoning and there is now a very long term zoned residential land supply in the City of Playford and northern region of Adelaide.

There is particular concern about the ability to properly coordinate the infrastructure and development of this large area which has a potential population of 30,000 people and 12,000 dwellings if the current developer were not to proceed with the development. The arrangements in place for infrastructure provision and coordination are substantially different to those established for the more recent Playford growth areas. There is a need for careful consideration of options for zoning and development of this extensive area before such circumstances eventuate.

### **Commentary**

The Riverlea development, which is proposed to be established in the suburb of Buckland Park, is a development by the Walker Corporation. At full development it could accommodate up to 30,000 people and 12,000 dwellings. It would be the largest development of its type undertaken in the State. The land is to the west of Port Wakefield Road and Virginia.

The proposed development was initially controversial because it was viewed as being a development on the periphery of the metropolitan area without appropriate links to public transport and remote from services and facilities such as those provided by the Elizabeth Regional Centre (CBD). It would also take a substantial area of horticultural land out of production.

The site was rezoned by the Minister for Planning in December 2010. This followed a major development process under the Development Act at a time when there was considered to be a shortage of zoned land for residential development. The whole of the site is currently zoned as Suburban Neighbourhood Zone with a proposed District Centre adjoining the Port Wakefield Road. The Major Development status of the project remains which provides a level of certainty that key infrastructure is delivered. This is important as there are no other mechanisms, such as an Infrastructure Scheme or infrastructure deeds, to ensure that the infrastructure is delivered, especially as developer does not have total control of the rezoned area, or if the developer on sells the development.

As discussed elsewhere in this report the current Suburban Neighbourhood Zone is to be replaced by the Master-planned Suburban Neighbourhood Zone which is proposed to be applied across Council's growth areas, and includes Buckland Park. The circumstances related to the development of Riverlea are significantly different to those for the other Playford growth areas in terms of infrastructure provision, controlling timing of infrastructure to match demand from growth, and financing/vesting mechanisms. The growth areas around Angle Vale, Virginia and Munno Para Downs have Land Management Agreements in place that deal with agreements for timing and contributions to road upgrades, stormwater drainage and social infrastructure. There was a State Government requirement that agreements were reached with land owners prior to the rezoning of the Playford Growth Areas being approved by the Minister for Planning. There are no such agreements in place for the Riverlea development. While Walker has interests in significant portions of the zoned land, the remainder is owned by a number of individual land holders. There are concerns about the implications this may have for establishing a coordinated development.

There is a lack of certainty about the commencement of development given that it is 10 years since the area was rezoned. If the Riverlea development does not proceed through to development by the Walker Corporation, serious consideration should be given to the rezoning of the land, potentially back to the current Development Plan Primary Production Zone, or under the Code to Rural Horticulture Zone. This would enable reconsideration of the long term future of the area in light of long term land supply, strategic planning and infrastructure considerations. In the circumstances of Walker not proceeding, if the zoning is not changed and there is not a review undertaken of the appropriateness of this development, mechanisms need to be established to ensure the appropriate and timely provision of key physical and social infrastructure."

## **Open Space Policy**

### **Summary**

The policy applying to development of open space in Playford is considered to require modification in order to provide adequately for the needs of Playford which vary substantially from those experienced elsewhere. The growth areas of Playford are very flat and require the integration of substantial drainage channels, swales and detention basins into open space areas in a manner which ensures that they contribute to the attractiveness of the open space.

It is recommended that definitions of open space and usable open space are included, that there is an emphasis on the contribution of areas used for stormwater infrastructure to improve open space quality/amenity and that a maximum of 50% of areas used for drainage purposes are considered as open space.

### **Commentary**

Land division in all residential type zones requires an assessment against all provisions of the Land Division in Urban Areas – General Policies.

Overall the land division open space provisions of the draft Planning and Design Code are consistent with the content of the policy within the current Development Plan and the Council's Open Space Guidelines, however, there are some areas of improvement required.

There is less guidance referring to the location/distance of parks/open space (depending on hierarchy) from the dwellings that they serve. It is suggested that this policy should be retained.

Land Division module PDC 6 in the current Development Plan suggests that a maximum of 50% of land required for drainage reserves should be considered as contributing towards the public open space provision. Other policy of the current Development Plan (Open Space and Recreation PDC 8) seeks no more than 20% of land allocated as public open space having a slope in excess of 1-in-4 and comprising creeks or other drainage areas.

The two current policies (50% and 20% as described above) while leading to some confusion, do have a practical and worthwhile outcome. Playford is unlike many Council areas and requires that reasonable areas are dedicated for good quality open space areas, but also acknowledges that substantial areas are required to be set aside for drainage purposes. There is a need to ensure that the drainage areas such as detention basins are also reasonably attractive and often will be combined with open space. This means that there is an allowance for portion of the required open space to be used for drainage purposes.

The proposed new Code Open Space and Recreation policies (PO & DTS/DPF 4.1) would be likely to lead to a greater level of open space (physical or monetary) compared to current Land Division module PDC 6 and a 50% requirement should be included in its place. This is because Playford in general is oversupplied with open space. Additionally, it is concerning that the quantitative measure is identified as a DPF rather than a PO because the DPF will *'...guide what is generally considered to satisfy the corresponding performance outcome but does not derogate from the discretion to determine that the outcome is met in another way.'*

On the understanding that quantitative measures are considered inappropriate for performance outcomes, it is suggested that the code provides an Administrative Definition for 'open space' and 'useable open space', and then reword the relevant PO and DPF/DTS. A recommended approach is detailed below:

#### Recommendations for changes to open space provisions for land division:

- Reintroduce minimum distances to areas of public open space for housing based on their function/position in the hierarchy of open space i.e. local, neighbourhood, district level.
- Include Administrative Definitions for the terms 'open space' and 'useable open space', and reword Open Space and Recreation PO 4.1 as suggested to provide further weight and consistency in application of open space requirements.
- Include the following in Administrative Definitions:

**Open space:** public open space that is intended for active and passive recreation.

**Useable open space:** open space where a maximum of 50% consists of: (a) a slope greater than 1 in 4; (b) is subject to inundation exceeding 20% AEP and/or (c) comprises watercourses, wetlands or detention basins.

Reword the Open Space and Recreation PO and DTS/DPF policies as follows:

Open Space and Recreation

PO 4.1 – Land allocated for open space includes useable open space that is suitable for intended active and passive recreational use considering gradient and the potential for inundation.

DTS/DPF 4.1

No more than 20% of the open space:

(a) has a slope in excess of 1 in 4; and

(b) is subject to inundation exceeding 20% AEP; and

(c) is comprised of watercourses, swales, channels, wetlands or detention basins.

PO4.2

Open Space provided for essential storm water infrastructure provides high quality open space and amenity value to residents

DTS/DPF4.1

A maximum 50% of land comprising watercourses, swales, channels, wetlands or detention basins may be considered as open space, where high quality amenity or recreation value is provided.