

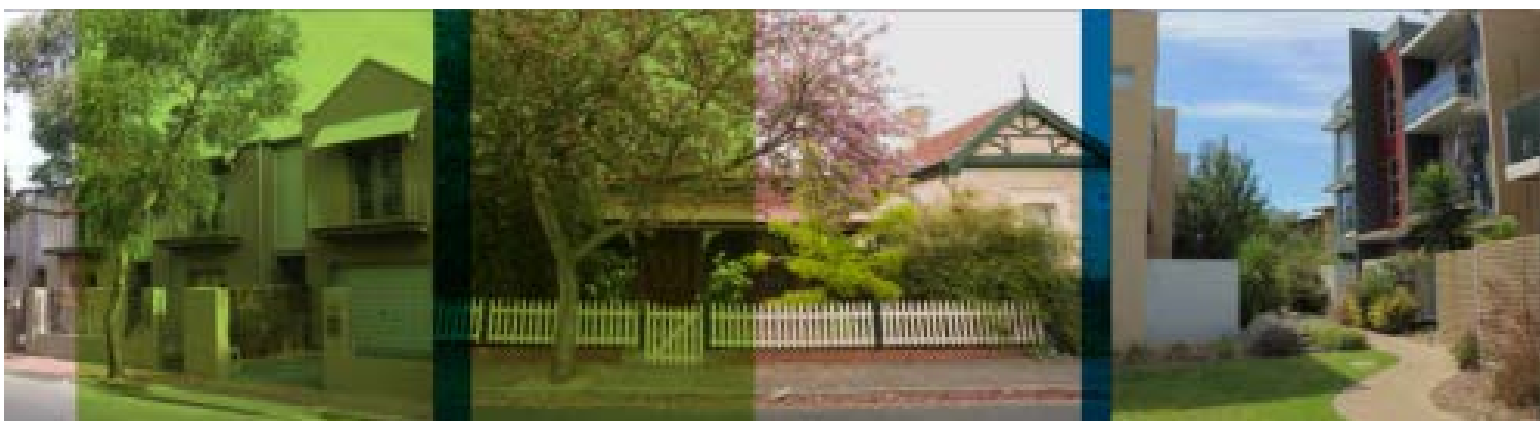
**CITY OF UNLEY  
VILLAGE LIVING AND  
DESIRABLE NEIGHBOURHOODS  
DEVELOPMENT PLAN  
AMENDMENT:**

(RESIDENTIAL CHARACTER,  
GROWTH AREAS & COUNCIL WIDE  
RESIDENTIAL POLICY REVIEW)



# Post Consultation Key Issues Preliminary Review

August 2014





**POST CONSULTATION KEY ISSUES PRELIMINARY REVIEW****RESIDENTIAL GROWTH DPA****Village Living and Desirable Neighbourhoods Development Plan Amendment –  
Residential Character, Growth Areas and Council Wide Residential Policy Review**

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## **Executive Summary**

The draft City of Unley Village Living and Desirable Neighbourhoods Development Plan Amendment: Residential Character, Growth Areas and Council Wide Residential Policy Review (Residential Growth DPA) was released for public consultation during March to May 2014.

As a result of the consultation 289 public, and 18 government agency, written submissions were received and 37 verbal presentations to the public meeting.

Through this process a range of fundamental and key zone and policy issues were raised. To finalise a response and options for possible amendments to the draft DPA these issues need appropriate consideration and guidance from the City of Unley *Development Strategy and Policy Committee* and *Council*.

Guidance on this post consultation preliminary review will help finalise the content of the *Summary of Consultation and Proposed Amendments (SCPA) Report* and the preparation of the accompanying amended draft DPA.

A recommended approach is to refer for final approval by the Minister for Planning, any unaltered or minor amendments to parts of the draft DPA. Where elements are the subject of significant change, it is prudent further consultation be undertaken and feedback sought on these elements, before concluding resolution of their final form.

### **1.0 Strategic Issues**

<b>1.1</b>	<b>The 30-Year Plan for Greater Adelaide</b>	
	<b>1.1.6</b>	<b>Recommended Changes</b>
	Page 1-5	Population growth is continuing, albeit at a low rate. The scale and density provided for within Unley's strategy of focussing on main corridors and limited precincts is more than sufficient for anticipated demand and required long-term targets. More aggressive rezoning for growth and less character areas is not required. Further possible subtle changes to growth areas would not represent a significant variation to likely yield and would remain within the target range.
<b>1.2</b>	<b>Integrated Transport and Land Use Plan</b>	
	<b>1.2.6</b>	<b>Recommended Changes</b>
	Page 6-8	The City of Unley encourages and pursues active involvement in the <i>Integrated Transport and Land Use Plan</i> (led by the Department of Planning Transport and Infrastructure) and commitments to facilitate early transport infrastructure investment to support the land use planning of <i>The 30-Year Plan for Greater Adelaide</i> .
<b>1.3</b>	<b>Living On/Near Transit Corridors and Centres</b>	
	<b>1.3.6</b>	<b>Recommended Changes</b>
	Page 9-10	The concept of urban transit corridor areas and residential living growth close to centres and open space, is supported, based on the directions of <i>The 30-Year Plan for Greater Adelaide</i> and advice of State Agencies (eg EPA and SA Health) that applicable standards in relation to noise and air emissions' can be met.

## 2.0 Zoning and Key Parameters

<b>2.1</b>	<b>Streetscape Zones (Built Form and Landscape)</b>	
	<b>2.1.6</b>	<b>Recommended Changes</b>
	Page 11-15	Reinforce the strategy to support the proposed Residential Streetscape Zones to maintain desired neighbourhood character, while allowing for diversity and growth in separate limited areas.
<b>2.2</b>	<b>Clarence Park</b>	
	<b>2.2.6</b>	<b>Recommended Changes</b>
	Page 16-18	Revise the proposed zoning in Clarence Park in accord with Option 2 (majority in a Residential Zone with minimum site areas revised to 350m <sup>2</sup> and Residential Regeneration Zone along Cross Road with maximum height revised to up to 2 storey).
<b>2.3</b>	<b>Black Forest (South)</b>	
	<b>2.3.6</b>	<b>Recommended Changes</b>
	Page 19-21	Revise the proposed zoning in Black Forest (Dryden Road) in accord with Option 1 (Residential Zone with minimum site areas revised to 350m <sup>2</sup> and the Residential Regeneration Zone along Emerson Road with maximum height revised to 2 storey).
<b>2.4</b>	<b>Black Forest (North)</b>	
	<b>2.4.6</b>	<b>Recommended Changes</b>
	Page 22-25	Revise the proposed zoning in Black Forest in accord with Option 1 (Residential Zone to include south side of Dunrobin Street and revised minimum site area to 350m <sup>2</sup> and the Residential Regeneration Zone maximum height to be revised to up to 2 storey).
<b>2.5</b>	<b>South Road (Everard Park and Black Forest)</b>	
	<b>2.5.6</b>	<b>Recommended Changes</b>
	Page 26-29	Revise the proposed zoning around South Road and tram (Everard Park and Black Forest) in accord with Option 1 (Residential Regeneration Zone – Major Roads Policy Area remain at 4 storeys but the fringe areas to the rear of the corridor in the Residential Regeneration Zone revised to provide for a maximum height up to 2 storey).
<b>2.6</b>	<b>Anzac Highway (Everard Park)</b>	
	<b>2.6.6</b>	<b>Recommended Changes</b>
	Page 30-33	Maintain Residential Regeneration Zone along Anzac Highway in accord with Option 1, including height up to 4 storey.  If re-consultation of parts of the DPA occurs, include the option to revise the proposed zoning around Anzac Highway, Third Avenue and Leader Street in accord with Option 2 (Residential Regeneration Zone – Major Roads Policy Area along Anzac Highway and adjacent area along north part of Third Avenue and west part of Leader Street revised to a Residential Zone with minimum site area of 300m <sup>2</sup> ).

<b>2.7</b>	<b>Unley (Charles Street and Mary Street)</b>	
	<b>2.7.6</b>	<b>Recommended Changes</b>
	Page 34-36	<p>Revise the proposed zoning in Unley (Charles Street) in accord with Option 1 (Residential Regeneration Zone – Renewal Policy Area with minimum site areas in Area 3 revised to 180m<sup>2</sup>, maximum site areas of 220 m<sup>2</sup> and semi-detached and detached dwellings removed from being non-complying development.</p> <p>If re-consultation of the relevant area of the DPA occurs, include the option to revise the proposed zoning in Unley (Charles Street) in accord with Option 2 (Residential Regeneration Zone – Renewal Policy Area 14.2 to include the area to the south of Mary Street as part of Area 1 along the eastern fringe and Area 2 for the western major core area.</p>
<b>2.8</b>	<b>Fullarton Road (Parkside, Fullarton, Highgate and Myrtle Bank)</b>	
	<b>2.8.6</b>	<b>Recommended Changes</b>
	Page 37-40	<p>Revise the proposed Residential Regeneration Zone Principles of Development Control 8 and 12 to provide for height up to 2 storey generally but maintain up to 3 storey fronting Fullarton Road and the other specific height limits for the Policy Areas.</p>
<b>2.9</b>	<b>Fullarton (Aragon Street)</b>	
	<b>2.9.6</b>	<b>Recommended Changes</b>
	Page 41-42	<p>Revise the proposed Residential Zoning to recognise in Aragon Street Fullarton that where the site depth is shallower in some case but the street frontage criteria is still satisfied, a reduced site area may be appropriate to facilitate expected semi-detached development.</p>
<b>2.10</b>	<b>Fullarton (Fisher Street Policy Area)</b>	
	<b>2.10.6</b>	<b>Recommended Changes</b>
	Page 43-45	<p>Maintain the current Residential Regeneration Zone (Fisher Street Policy Area 12) boundary and not expand to include the north side of Fisher Street.</p>
<b>2.11</b>	<b>Myrtle Bank</b>	
	<b>2.11.6</b>	<b>Recommended Changes</b>
	Page 46-50	<p>Revise the proposed Residential Zone in Myrtle Bank in accord with Option 1 (with revised minimum site area of 350m<sup>2</sup>).</p>
<b>2.12</b>	<b>Myrtle Bank (Spence Avenue Policy Area and Concept Plan)</b>	
	<b>2.12.6</b>	<b>Recommended Changes</b>
	Page 51-54	<p>Revise the proposed Residential Regeneration Zone (Spence Avenue Policy Area 15) reflecting the suggested an amended Concept Plan Figure SA/1, including simplified building areas and heights outlines, support for community and associated commercial activities in activity hub orientated to Glen Osmond Road, suitable restored heritage building (in accord with Heritage SA advice), road widening and rationalised vehicle access (avoiding or limiting distribution to Ridge Avenue) in accord with DPTI (Transport Services) negotiations, and additional policy for articulation of larger buildings to avoid bulk and visual impacts to neighbours.</p>

<b>2.13</b>	<b>Recognition of Existing Large Supported Accommodation Facilities</b>	
	<b>2.13.6</b>	<b>Recommended Changes</b>
	Page 55-56	Revise the proposed Residential and Streetscape Zones provisions to recognise existing large supported accommodation (eg aged care facilities) and their intensive but sensitive re-development to optimise the amount and quality of aged accommodation plus limited associated community, health, aged and commercial services.

### 3.0 Council-wide Policy and Design Parameters

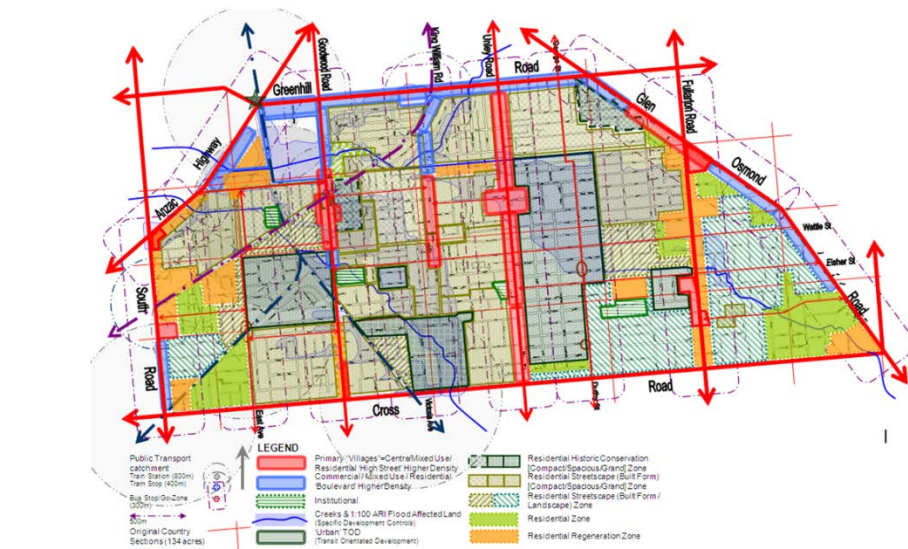
<b>3.1</b>	<b>Building Envelope (Height and Setbacks)</b>	
	<b>3.1.6</b>	<b>Recommended Changes</b>
	Page 57-59	Revised the Council-wide dwelling setbacks provisions in accord with Option 1 (to include an increase in side setbacks equivalent to half of the increase in wall height above 7 metres and also clarification of the zone interface building envelope as a Principle of Development Control with inclusion of a diagram).
<b>3.2</b>	<b>Overlays (Emissions and Affordable Housing)</b>	
	<b>3.4.6</b>	<b>Recommended Changes</b>
	Page 60-63	<p>The City-wide <i>SAPPL 'Overlay – Noise and Air Emissions'</i> be applied to the Residential Regeneration Zone (with additional roads designated Type A (Cross Road, Glen Osmond Road and South Road) and Type B (Anzac Highway and Fullarton Road).</p> <p>The affordable housing Objectives 4 and 6 and Principles of Development Control 12 and 13 from the <i>SAPPL Residential Regeneration Zone</i> module be included.</p>

## 1.0 Strategic Issues

<b>1.1</b>	<b>The 30-Year Plan for Greater Adelaide</b>
	<p>The 30-Year Plan for Greater Adelaide (the Planning Strategy) is preparing Greater Adelaide for a growth in population (560,000), dwellings (258,000) and jobs (282,000).</p> <p>It seeks to contain outer metropolitan sprawl and locate most new development in existing areas and in transit oriented mixed-use precincts. The targets for the Eastern Adelaide Region are 37,700 people and 18,400 dwellings. Development Plans are required by the Development Act to be aligned with the Planning Strategy.</p> <p>The City of Unley's strategic plan and focussed growth precincts modelling provide for 2,800 to 4,400 additional dwellings in low to higher growth scenarios.</p> <p>An aim of the Planning Strategy is to also achieve a more sustainable city with a rise in average gross density from 8 to 11 dwellings per hectare across Greater Adelaide, and transit corridors 25-35 dwellings per hectare, and a higher diversity of housing than the existing 24% of medium/high density dwellings. There will be variations across Greater Adelaide due to various factors like geography, non-residential areas and open space etc and inner city areas are, and will, suit higher density given the level of services and accessibility.</p> <p>The strategic approach is to focus the majority of required growth, and choice for a diversity of alternative and affordable housing options, on main transit corridors, including mixed use main roads and adjacent to tram and train stations, suitable strategic sites and in-fill in appropriate residential areas within the current urban area, and reducing pressure on heritage and character areas.</p> <p>Greater Adelaide's growth rate has declined and been below the low growth scenario (less than 1.3%) in the "Population Projections for South Australia and Statistical Divisions, 2006-2036" produced by the Department of Planning and Local Government at the end of 2010. There will be continued growth, but it will be at a slow rate and take longer than the 30 year horizon for the scope of envisaged development to occur.</p> <p>Since the release of The 30-Year Plan for Greater Adelaide, the Ministerial Capital City DPA was undertaken in 2012. This incorporated a greatly increased residential development potential for the Adelaide CBD, with a consequential lessening of market demand in inner rim council areas for medium and high density residential accommodation.</p>
1.1.1	DPA Proposals
	<p>The proposed residential rezoning, together with that in recent and future planned changes for growth in main road corridors and key strategic precincts, indicates a likely (25% of possible potential) yield of 3,750 dwellings based on Council modelling by 2040.</p> <p>Department of Planning Transport and Infrastructure (DPTI) Geographic Information System (GIS) Mapping Yield Analysis indicates a likely yield of 4,400 dwellings by 2040.</p> <p>The Unley strategic approach has been to move away from widespread indiscriminate in-fill consolidation to maintaining the majority of existing</p>

character neighbourhood areas and focussing growth to predominately along the main road corridors and limited strategically located residential precincts. The designation of precincts resulted from a filtering and relative balance of the quantitative and qualitative overlays of precincts regarding location (eg public transport, centres or services), relative character merit, current zoning and development opportunities.

**Proposed Strategic Plan**



The major proportion (75%) of the dwelling yield is anticipated to occur along the major mixed use commercial corridors, which represent 15% of the area and 8% of total properties within the City.

The smaller proportion (25%) of dwelling yield is anticipated to occur in the residential area, mainly concentrated in the growth zones; 10% (over 6% of the area) in the Residential Regeneration Zone and 8.0% (over 8% of the area) in the Residential Zone. The Heritage and Streetscape Zones represent 7% (over 71% of the area).

Precinct	Ha	%	Dwellings	%	Yield	%
Mixed use corridors	193	15	350	2	2800	75
Residential Regeneration	91	6	2600	15	400	10
▪ Fullarton Road corridor	32	2.1	720	4.1	90	2.3
▪ South Road corridor	13	0.9	400	2.4	80	2.0
▪ Anzac Highway corridor	4	0.3	60	0.4	60	1.5
▪ Other strategic areas	42	2.7	1420	8.1	170	4.2
Residential infill	109	8	1500	8	300	8
Residential heritage	260	18	2500	14	50	1
Residential character	776	53	10900	61	200	6
Total	1448	100	17850	100	3750	100

Unley is already one of the densest (around 11.4 dwellings per hectare) and most diverse housing areas (41% medium/high density dwellings) in Greater Adelaide. Through the likely growth yield to 2040 in medium and higher density dwelling development the density will be increased to over 15 dwellings per hectare and medium and higher density housing diversity to over 50%.

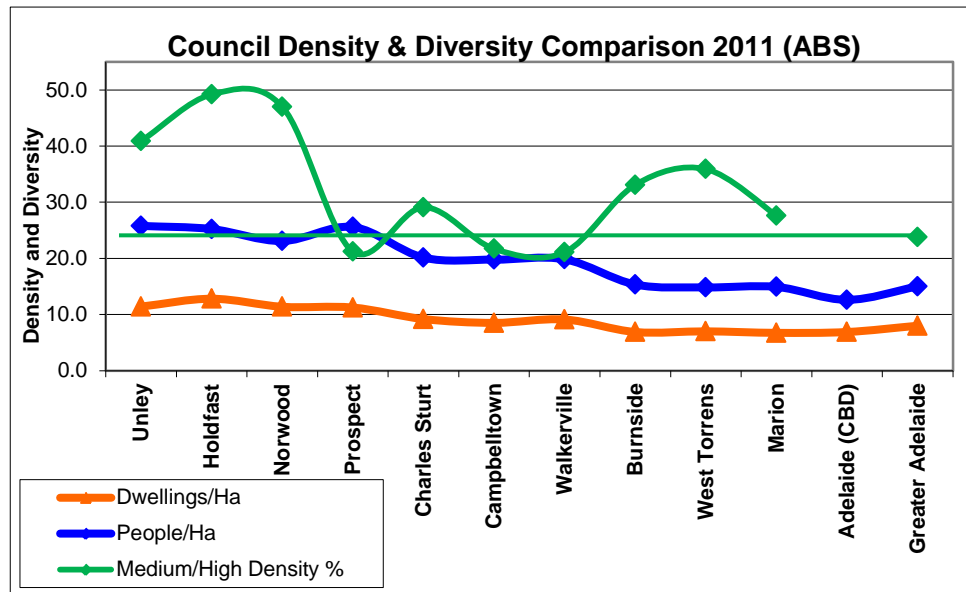
The potential likely yields from Unley’s focussed constraints and opportunities approach are consistent with the yield target range. A more aggressive extent of development and density is not required. There is flexibility relative to the targets where further subtle zoning changes would

	not represent a significant variation to the likely yield and would remain within the target range.
1.1.2	<p>Department of Planning Transport and Infrastructure (DPTI)</p> <p>DPTI have not specified a City of Unley area growth target, other than a presentation to Council in 2011 identifying 2,500 dwellings and generally an acknowledgement of Unley's self-determined extrapolation of a proportional share of the Eastern Adelaide Region target of 3,500 dwellings.</p> <p>The DPTI GIS Yield Analysis in 2012 and the City of Unley modelling of policy proposals and development density indicates a likely yield of 4,400 and 3750 dwellings respectively. This exceeds all the notional required growth targets.</p> <p>The Ministerial Capital City DPA in 2012 incorporated development growth opportunity within the City of Adelaide above the previous target equivalent to the whole Eastern Region target.</p> <p>The agreement from the Minister for Planning in January 2014 to release the Residential DPA for public consultation there was advice that:</p> <p><i>"While the proposed policy framework in the DPA allows Council to meet its targets set in The 30 Year Plan for Greater Adelaide, I ask that Council give further consideration to the proposed residential zoning during the consultation process, due to its close proximity to key transit corridors."</i></p> <p>The DPTI agency comments received during consultation indicated support for the improved clarity of policies but that there are a number of key issues and matters of detail that need further consideration or justification prior to the DPA being submitted for the Minister's final consideration, including:</p> <p><i>"The Department is concerned the proposed zoning regime will significantly limit the potential for housing diversity within the City of Unley both geographically and in the range of dwelling types. The Department considers that the Development Plan already includes a significant area of the Council zoned for historic conservation and streetscape built form that both protects and showcases the highest value and most intact heritage and character areas"</i></p> <p><i>"Housing diversity is highly desirable and appropriate in the City of Unley given its proximity to the city centre, parklands and the high level of public transport access – tram, train and multiple bus routes. The Department considers that potential for a range of housing types, including housing for the Council's ageing population, will enable the existing residents of the Council area to remain within their community. Similarly, it will enable the next generation of home owners or occupiers a wider choice of housing opportunities within the area"</i></p> <p><i>"The additional Residential Streetscape (Built Form) Zones and new Residential Streetscape (Landscape) Zone are not adequately justified. It is acknowledged many of these areas have an attractive streetscape, however the integrity and consistency of built form in several areas are considered marginal for such restrictive and prescriptive nature of zoning"</i></p>
1.1.3	<p>State Agency Feedback</p> <p>Those State Agencies making comment have indicated support for the State Planning Strategy (<i>The 30-Year Plan for Greater Adelaide</i>).</p>
1.1.4	<p>Community Feedback</p> <p>A majority of community submissions indicate a belief that promoted population growth and targets are not required, sustainable or likely to be achieved.</p> <p>Most agree with planning strategies in a general sense but outline the need</p>

to be supported by infrastructure and services.  
The majority supported targeting higher density dwelling growth to main road corridors, but were concerned about concentrating development opportunities to some neighbourhood areas as inequitable, unjustified, unnecessary and providing little gain overall. Some support an approach for development and housing diversity in strategic areas.  
The likely yield exceeds target range and an aggressive rezoning in neighbourhood areas could be avoided or reduced, and not significantly vary the likely yield and attainment of target range.

**1.1.5 Council Review and Options**

The dwelling growth target for Unley is not specified, but guided by a DPTI presentation to Council in 2011 of 2,500 dwellings and acknowledgement of the extrapolation of a proportional share of the Eastern Adelaide Region target indicating 3,500 dwellings  
The Unley growth strategy avoids widespread indiscriminate consolidation and a more focussed discriminate approach maintaining character areas and targeting growth to mainly main road corridors and strategically located residential precincts. On this basis Council modelling indicates a likely yield of 3,750 dwellings (25% of theoretical potential).  
DPTI Geographic Information System (GIS) Mapping Analysis indicates a likely yield of 4,400 dwellings.  
The yield from Unley’s strategy exceeds the yield target range. A more aggressive extent or density of growth is not justified or required, and some revision of residential growth areas would not significantly vary the overall yield and would remain within the target range.  
The Unley Council area is one of the densest and most diverse residential areas in Adelaide. This occurs as a result of compact historical development in the late 19<sup>th</sup> / early 20<sup>th</sup> century and later 20<sup>th</sup> century medium density re-developments.  
Dwelling density is high at 11.4d/Ha but higher dwelling occupancy (range of families) provides Adelaide’s highest population density of 25.8p/Ha.  
Diversity of medium/high density dwellings is 40.9% compared to Greater Adelaide at 23.8% and the only comparable suburban areas of Holdfast Bay 49.2% and Norwood 47.0% are higher. With inclusion of targeted dwelling growth, Unley’s diversity of medium and higher density dwellings would increase to over 50%.



The current strategy is to target development into new dwelling growth areas, ie corridors and strategic locations, to form a fine-grained network providing strategic access to new housing options within close proximity (eg 400metres) of public transport, centres and open space. Housing growth and new housing types will be focused on major roads within mixed use areas (corridor DPA's) and supported by tailored residential growth zones (this DPA). This strategy integrates planning growth with facilities and services as promoted by the 30 Year Greater Adelaide Plan.



The proposed planning zones (Residential, Residential Regeneration and Streetscape) are supported by the SAPPL, with Streetscape Zones akin to the standard Residential Character Zone. The criteria used to justify their extent and distribution is outlined in Section 3.5 – Local (Zone) Section Amendments of the DPA Investigations.

In addition, the forthcoming General DPA is proposing to include provision for a small Accessory Dwelling, eg granny flat, in the rear yard of existing character properties throughout the neighbourhood areas. This will provide widespread opportunity for additional and alternative housing choices to meet emerging demographic demands (eg student, young, aged person accommodation).

<b>1.1.6</b>	<b>Recommended Changes</b>
	Development Strategy and Policy Committee
	Population growth is continuing, albeit at a low rate. The scale and density provided for within Unley’s strategy of focussing on main corridors and limited precincts is more than sufficient for anticipated demand and required long-term targets. More aggressive rezoning for growth and less character areas is not required. Further possible subtle changes to growth areas would not represent a significant variation to likely yield and would remain within the target range.

<b>1.2</b>	<b>Integrated Transport and Land Use Plan</b>
	<p><i>The 30-Year Plan for Greater Adelaide (2010)</i> seeks to contain outer metropolitan sprawl and locate much of the new development in existing areas and particularly in designated transit oriented mixed-use precincts. The mixed use corridor development aims to create desirable places and centres well connected with local facilities and public transport.</p> <p>The two main functions of roads are summarised as ‘place’ or ‘link’. The qualities of ‘place’ (or relevant activities associated with local land uses) can be in tension with the ‘link’ (or movement) function of major roads, but an appropriate balance of the two needs is required for desired land use outcomes to be successful.</p> <p>The draft <i>Integrated Transport and Land Use Plan</i> (released in 2013 and under consultation review) builds upon the direction set by <i>The 30-Year Plan for Greater Adelaide</i>.</p> <p>Existing traffic volumes are high and have been increasing. Significant new development may compound the rising volumes and add to congestion. New development with more on-site parking will encourage more traffic whereas the aim is to enhance public transport use and reduce vehicle movements. However, the experience of medium density development indicates ongoing demand for on-site car parks.</p> <p>Unley has a high proportion of through metropolitan commuter traffic on the arterial road network. Well served and connected centres, and fringe Park-n-Ride hubs, could help with the shift toward more efficient public transport and alleviate car congestion in inner city areas. An integrated transport plan to prioritise and schedule such infrastructure investment in coordination with development is critical.</p> <p>Local road networks provide necessary alternative vehicle access. Metropolitan priority for uninterrupted arterial roads needs to be balanced with practical property access and not over-taxing the reasonable capacity and amenity of local networks.</p>
1.2.1	DPA Proposals
	<p>The proposed increased growth opportunities and focus on corridor development aligns with the State Planning Strategy (<i>The 30-Year Plan for Greater Adelaide</i>) and proposals in the draft <i>Integrated Transport and Land Use Plan (2013)</i> further support efficient movement around this strategy.</p> <p>The DPA encompasses the majority of intensification and growth around the main road corridors and limited lower intensity infill adjacent to some of these areas. Development generally should endeavour to rationalise existing access/egress points to the arterial road frontages and concentrate movement thereto. Some growth precincts and infill areas will rely, at least in part, on the local road network to maintain a fair distribution of traffic movement and access/egress. Improved public transport and local area traffic management should mitigate undue increase and unreasonable volumes of traffic on the local road network.</p>
1.2.2	Department of Planning Transport and Infrastructure (DPTI)
	<p><i>The 30-Year Plan for Greater Adelaide</i> supports integrated development and transport planning, and relies upon a more effective public transport system to reduce the need for vehicle movement.</p> <p>The priority for movement (link) versus activity (place) on designated</p>

	<p>transport corridors and effectiveness of the public transport network is not fully resolved but the draft <i>Integrated Transport and Land Use Plan (2013)</i> outlines a long-term plan and investment schedule for improved public transport to underpin the new urban form and development.</p> <p>The Plan encompasses proposals to enhance the overall network with:</p> <ul style="list-style-type: none"> <li>▪ Increased train services and frequency</li> <li>▪ Increased tram services and frequency, and new service on Unley Road</li> <li>▪ Higher frequency bus routes and potential bus priority</li> <li>▪ Completion of rail corridor and other new shared paths (cycle and pedestrian), improved arterial road crossings and facilities (eg adjacent to activity centres, schools and public transport hubs)</li> <li>▪ Road intersection upgrades, grade separations and creation of non-stop north-south, inner and outer ring routes (eg South Road, Cross Road and Greenhill Road)</li> </ul> <p>It should also be noted for major corridors like South Road and junctions like Cross Road and Glen Osmond Road there are requirements for:</p> <ul style="list-style-type: none"> <li>▪ Widening under the Metropolitan Road Widening Plan to support upgrades and implementation of effective noise attenuation measures</li> <li>▪ Development not to rely on direct access and accordingly achieve access via local road connections</li> </ul>
1.2.3	State Agency Feedback
	Refer to DPTI feedback above.
1.2.4	Community Feedback
	<p>Concerns have been raised in regard to the lack of evident improvement and a clear plan to improve public transport infrastructure investment and quality and capacity of services to support the desired growth in development. Much of the feedback agrees with the integration of transport and growth areas, but inner areas cannot utilise these services because they are already at capacity as they move through the Unley area. Many also have concerns the increased and intensified development, particularly where not on or directly accessible from the main road corridors (eg South Road), will cause an excessive increase in parking demand and traffic congestion on the local street network.</p>
1.2.5	Council Review and Options
	<p>The State Government infrastructure planning and provision recognises <i>The 30-Year Plan for Greater Adelaide</i> through the draft <i>Integrated Transport and Land Use Plan (2013)</i> and in turn the DPA direction and subsequent market demand for development. There still seems to be some reliance on responding to market demand rather than a strategic planning approach that could lead to delays in infrastructure provision to support potential desirable development outcomes (leading public transport services, efficient arterial road network, convenient cycling networks etc).</p> <p>The completion of the draft <i>Integrated Transport and Land Use Plan</i> is encouraged so there is a clear plan that aligns with, and provides early parallel investment, in critical infrastructure in particular in greater capacity and convenience of public transport, to support the development policy and anticipated building projects. A disconnect between certainty in the commitments to increased capacity and frequency for public transport while promoting increased residential density remains a concern.</p>

<b>1.2.6</b>	<b>Recommended Changes</b>
	Development Strategy and Policy Committee
	The City of Unley encourages and pursues active involvement in the <i>Integrated Transport and Land Use Plan</i> (led by the Department of Planning Transport and Infrastructure) and commitments to facilitate early transport infrastructure investment to support the land use planning of <i>The 30-Year Plan for Greater Adelaide</i> .

<b>1.3</b>	<b>Living On/Near Transit Corridors and Centres</b>
	<p><i>The 30-Year Plan for Greater Adelaide</i> aims are to provide for higher density living adjacent to transit corridors, centres and open space.</p> <p>The concept of corridor and high activity living areas avails people of the opportunity to readily access proximate services and facilities, public transport and different housing options. Higher density living also heightens the need for better access to quality open space and public areas.</p> <p>The concept of corridor and high activity living areas also raises the concern about possible emissions (ie noise and air pollution) and amenity and health impacts to occupants of development along high traffic volume roads.</p> <p>SA Health has supported through 'healthy spaces and places' the urban form encouraged within urban corridors for mixed use walkable communities.</p>
1.3.1	DPA Proposals
	<p>The proposals for higher density residential development adjacent to transit corridors, centres and open space align with the State Planning Strategy (<i>The 30-Year Plan for Greater Adelaide</i>).</p> <p>The existing Development Plan contains a range of applicable <i>South Australian Planning Policy Library (SAPPL)</i> Council-Wide policy modules, including:</p> <p><i>Design and Appearance</i> includes policy to ameliorate any negative impacts from large scale developments and to respond to the desired character of local areas.</p> <p><i>Interface Between Land Uses</i> includes policy regarding appropriate siting and design of different land uses and mitigating noise and pollution to sensitive land uses.</p> <p><i>Medium and High Rise Development</i> includes policy to minimise negative impacts on micro-climates from wind, temperature and daylight. Provision is also made for communal outdoor green space (ie green roof gardens) on buildings and shelter protection for pedestrians.</p> <p><i>Natural Resources</i> includes policy to protect and enhance natural resources and the environment, as important components of the built form environment.</p> <p><i>Transportation (Movement of People and Goods)</i> includes a range of policy on encouraging alternative forms of transport and more cycling and walking.</p> <p>'<i>Overlay - Noise and Air Emissions</i>' seeks to protect occupants from potential emissions by orientation of spaces, barriers and building design on the designated roads – the application of this overlay needs to be expanded to include all the relevant main road corridor areas.</p> <p>Protection of character areas is also supported in the Strategy and is central to the Unley Proposed Strategic Plan. Where a balance between strategic residential growth areas and character protection was required, the response was towards the more sensitive character or lower intensity infill growth where support was adequate. These qualities are further protected within zone and policy area desired character statements.</p>
1.3.2	Department of Planning Transport and Infrastructure (DPTI)
	<p>The State Government and its agencies, including the Environment Protection Authority, have investigated and support the plan and concept of living on transit corridors and activity areas subject to the <i>SAPPL</i> policy module parameters.</p>
1.3.3	State Agency Feedback
	<p>The Environment Protection Authority has investigated and supports transit</p>

	<p>corridor residential development, and has collaborated with DPTI to incorporate 'Overlay - <i>Noise and Air Emissions</i>' policy for higher traffic volume roads and transit corridors for the management and design mitigation of possible emissions (ie noise and air pollution).</p> <p>The EPA suggested the <i>SAPPL 'Overlay - Noise and Air Emissions'</i> policy be applied to the Residential Regeneration Zone, and in particular the Major Roads Policy area, to address residential development in proximity to main road corridors.</p>
1.3.4	<b>Community Feedback</b>
	<p>Transit corridor residential development is questioned given the emissions (ie noise and air pollution) from high traffic volumes. Not only is there an impact on amenity there are serious health risks from prolonged exposure to emissions as posed by living in proximity to them. Increased development will increase traffic and vehicle congestion, increasing the concentration of emissions.</p> <p>The higher density living heightens the need for access to open space and public areas.</p> <p>There was strong support for the protection of residential character areas.</p>
1.3.5	<b>Council Review and Options</b>
	<p>Corridor and activity areas have been promoted as appropriate for residential living, subject to the provisions within the Development Plan <i>SAPPL 'Overlay - Noise and Air Emissions'</i> regarding noise and air emission standards and design mitigation.</p> <p>State Agencies through <i>The 30-Year Plan for Greater Adelaide</i> and design mitigation provisions of <i>SAPPL</i> policy, have confirmed the applicable emission standards and levels are reasonable and manageable to appropriately allow for residential development.</p> <p>The City of Unley has limited, but high quality, open-space areas. Policy will allow opportunities to incorporate green space in higher density development through increased provision of communal open space, green walls and roofs. In liaison with Adelaide City Council and the State Government, the greater use of The Parklands is being investigated as additional usable open spaces with improved accessibility across Greenhill Road and appropriate development. Further, the public realm (eg streets, footpaths) and business facilities (eg outdoor dining, restaurants, shopping, community centres, halls) provide opportunities for streetscape activation through cycling, walking, recreation, entertainment and public interaction.</p>
1.3.6	<b>Recommended Changes</b>
	<b>Development Strategy and Policy Committee</b>
	<p>The concept of urban transit corridor areas and residential living growth close to centres and open space, is supported, based on the directions of <i>The 30-Year Plan for Greater Adelaide</i> and advice of State Agencies (eg EPA and SA Health) that applicable standards in relation to noise and air emissions' can be met.</p>

## 2.0 Zoning and Key Development Parameters

### 2.1 Streetscape Zones (Built Form and Landscape)

The proposed strategic plan is to move away from the widespread indiscriminate in-fill consolidation and maintain the majority of existing neighbourhood areas and focus growth predominately along the main road corridors and within limited strategically located residential precincts.

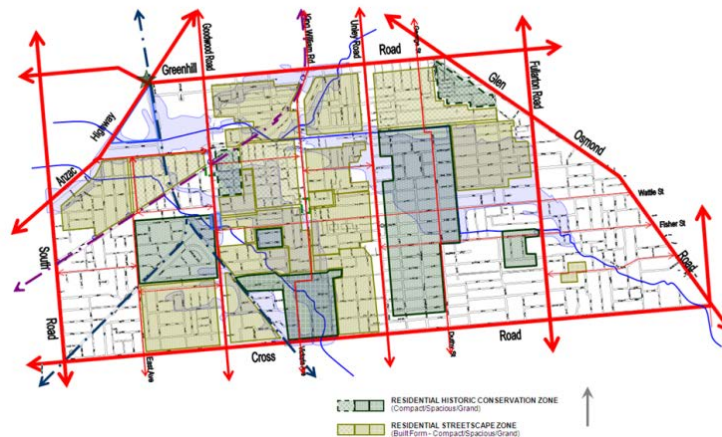
The aim is to maintain the majority of the higher integrity neighbourhood character through Residential Historic (Conservation) and Residential Streetscape (Built Form or Landscape) Zones while limiting significant change to significant areas of the city as much as reasonable.

The State Government through the DPTI, and ultimately the Minister for Planning, have concerns about the restriction of development potential due to the extent of these zones. However, the adopted strategy aligns with The 30-Year Plan for Greater Adelaide and exceeds the identified growth potential and housing diversity targets.

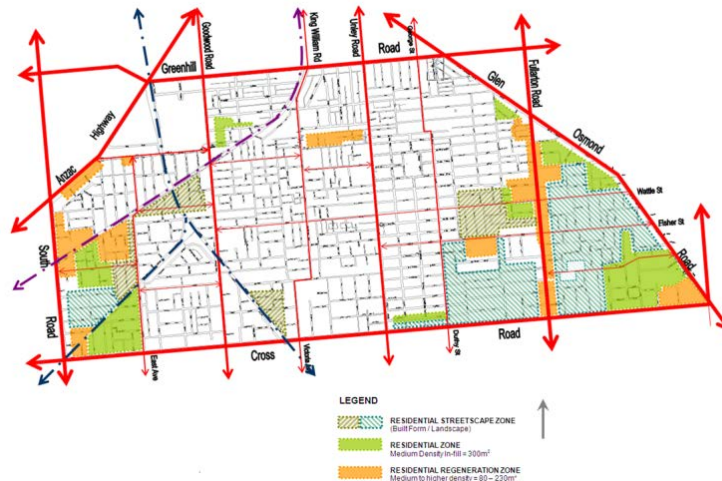
#### 2.1.1 DPA Proposals

The transformation of the zoning of the city in accord with the strategy is occurring in stages. Initially in 2008 the Residential Historic (Conservation) Zone and much of the Residential Streetscape (Built Form) Zone, in 2013 first of the mixed higher density Urban Corridor Zone for Unley and Greenhill Road, currently further Residential Streetscape (Built Form and Landscape) Zones and slow growth Residential Zone and high growth Residential Regeneration Zone and into the future further Urban Corridor Zone for other main roads and key hubs.

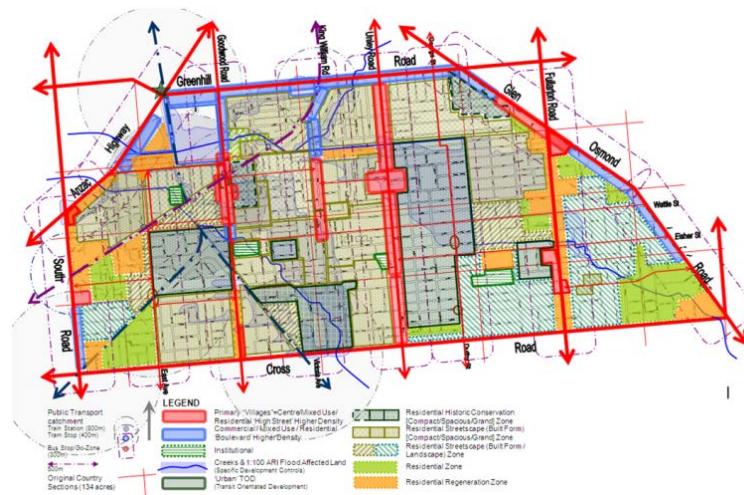
Residential Historic (Conservation) and Streetscape Zones - 2008



Proposed Additional Streetscape Zones (and growth zones) – 2014



Proposed Strategy (including Main Road Corridors)



The Residential Streetscape (Built Form) Zone reflects areas with a high prevalence and commonality of key ‘physical attributes’ that reinforce distinctions and consistency based on traditional site configuration patterns, building era, site setting, form and features.

The Residential Streetscape (Landscape) Zone reflects areas with a prevalence and commonality of key ‘physical attributes’ that exhibit good consistency of patterns of site size, building site position and form.

2.1.2 Department of Planning Transport and Infrastructure

The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured.

*“The additional Residential Streetscape (Built Form) Zones and new Residential Streetscape (Landscape) Zone are not adequately justified. It is acknowledged many of these areas have an attractive streetscape, however the integrity and consistency of built form in several areas are considered marginal for such restrictive and prescriptive nature of zoning*

*The following are the key areas where the Department considers the proposed zoning requires further review or justification:*

- Residential Streetscape (Built Form) Zone*
  - Proposed Precinct 8.6 - Forestville (South)

	<ul style="list-style-type: none"> <li>- Proposed Precinct 9.10 – Black Forest (East)</li> <li>- Proposed Precinct 9.11 – Fullarton (Fisher)</li> </ul> <p><i>Residential Streetscape (Landscape) Zone”</i></p> <ul style="list-style-type: none"> <li>- Proposed Precinct 11.1 – Fullarton (North)</li> <li>- Proposed Precinct 11.2 - Highgate</li> <li>- Proposed Precinct 11.3 – Black Forest</li> <li>- Proposed Precinct 11.4 – Myrtle Bank</li> </ul> <p><i>The Department is able to work with Council to review the proposed rezonings and provide advice and direction for a less prescriptive approach that will still result in Council maintaining the streetscapes that are considered desirable whilst also providing for housing diversity</i></p> <p><i>For example it appears that policies requiring appropriate front and side setbacks are key to allowing for appropriate on-site landscaping. This can be achieved without necessarily requiring increased allotment sizes. The desired character statements can also be used to describe the outcomes being sought, including retention of street trees and minimising impacts of additional driveway crossovers</i></p> <p><i>As the Department considers that the areas affected by the DPA are largely residential in nature, Council should consider incorporating some of the proposed Streetscape Built Form and Landscape Zones into Policy Areas within the Residential Zone with stronger desired character statements and greater setback requirements than in the balance of the zone</i></p> <p><i>This will enable some of the older housing stock that may be reaching the end of its economic life to be replaced with either single dwellings or appropriate infill where warranted. It is considered this can be achieved through normal residential zoning, with attention to details regarding front and side setbacks, to enable spaces for landscaping, and desired character in certain policy areas as appropriate”</i></p> <p>The DPTI have the responsibility for determining support, and ultimately the Minister for Planning the approval, of any zone changes.</p>
2.1.3	Other Agency Feedback
	No other agencies are involved in this issue.
2.1.4	Community Feedback
	Many submissions, and through liaison with enquiries, indicated there is widespread support for the Residential Streetscape Zones. In several neighbourhood areas the feedback argues for broader application.
2.1.5	Council Review and Options
	<p>The nature of the proposed Residential Streetscape Zone, and hierarchy of Built Form Policy Areas to recognise and protect existing site patterns and the traditional buildings and Landscape Policy Areas to recognise existing site and building patterns (and not necessarily the actual building), has been adopted to maintain the prevalent character as the desired character into the future, ie little change other than sensitive improvements consistent with the existing pattern of land and buildings.</p> <p>While the zone is prescriptive and restrictive on dwelling growth it is the preferred community outcome and does not compromise the achievement of dwelling growth and diversity in focussed areas, mainly the main road corridors.</p> <p>Also the Unley Council area is already one of the densest and most diverse residential areas in Adelaide. This occurs as a result of compact historical development in the late 19<sup>th</sup> / early 20<sup>th</sup> century and later 20<sup>th</sup> century medium</p>

density re-developments that are dispersed widely across the city.

Dwelling density is high at 11.4 dwellings per Hectare but higher dwelling occupancy (range of families) provides Adelaide's highest population density of 25.8 people per Hectare. Refer to Section 1.1.

The diversity of medium/high density dwellings is 40.9% compared to Greater Adelaide at 23.8% and the only higher comparable suburban areas are Holdfast Bay 49.2% and Norwood 47.0%. With the inclusion of the targeted dwelling growth, Unley's diversity of medium and higher density dwellings would increase to over 50%.

In most neighbourhood areas there is a varying level of diversity of housing types and density, but within an overall clear representation of consistent site configuration and building patterns and early era built form.

In addition, the General DPA currently being prepared, includes a proposal for a small Accessory Dwelling, eg granny flat, in the rear of existing properties throughout the neighbourhood areas. This will provide widespread opportunity for additional dwellings, and alternative housing choice reflective of emerging demographic groups (eg aged persons and students) while maintaining the key streetscape character and patterns.

The Council strategy is to restrict a continued transition of change and to protect consistency and integrity of built form patterns and avoid them being further eroded. In this event, clear and robust character zoning is required to convey the intent, maintain existing key patterns and deliver that desired outcome.

Council has devoted considerable resources, effort and time to derive the strategy and policy to support the maintenance of the majority of neighbourhood character areas while recognising the high existing housing diversity and proposed key growth areas, that exceed the ambitious State yield targets, and further devolution of character areas is not considered warranted

The Residential Streetscape Zones encompass a high consistency of site and building patterns and in particular in the built form areas a high integrity of the pre 1950 building era. This analysis is shown in the *Urban Morphology Study 2005*<sup>1</sup>, further interrogated and amended within council workshops 2010/11 and selectively summarised in the table below:

<b>Zone</b>	<b>Area</b>	<b>Density</b>	<b>Dwellings</b>	<b>Era</b>
RS(BF) 8.6	1.4%	16d/Ha	83%	72%
RS(BF) 9.10	0.9%	11d/Ha	89%	82%
RS(BF) 9.11	1.8%	12d/ha	93%	76%
RS(L) 11.1	1.3%	14d/Ha	73%	65%
RS(L) 11.2	5.1%	11d/Ha	85%	58%
RS(L) 11.3	1.2%	17d/Ha	90%	76%
RS(L) 11.4	5.9%	10d/Ha	87%	68%

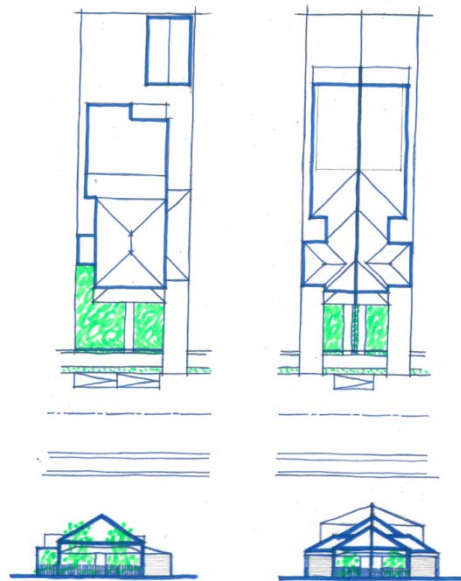
Area = Portion of total area of council area  
Density = Dwellings per Hectare (gross)  
Dwellings = Portion of desired and traditional dwelling properties  
Era = Portion of buildings pre 1950

The Streetscape Zones (Built Form and Landscaping) reflects and seeks respect of a range of attributes forming key patterns of the inherent character

<sup>1</sup> Urban Morphology Study – is a guideline reference document that uses qualitative and quantitative analysis to assign character attributes to houses and precincts within the City of Unley.

in addition to landscaping, including in particular; site size, site street frontage width, dwelling siting, setbacks, scale and form, front fencing and vehicle driveways. Site size is a key attribute but the other key attributes are equally critical.

The notion of multiple dwellings significantly alters the streetscape frontage, extent of driveways, building patterns, landscaping and appearance (even with the more sympathetic semi-detached format approach). While a slow transitional change may be reasonable in the areas identified for the Residential Zone, the subtle change is not appropriate for the declared Streetscape Zone areas where the current desired character is sought to be maintained.



The currently proposed desired character statements are clear on the intent for these areas and the policy parameters reinforce the desired key attribute patterns to avoid divergent narrower street frontages, scale of dwellings and particularly multiple vehicle driveways that would not respect the desired character and confuse the clarity and intent of development into the future within the zone.

The dwelling yield through the focussed growth areas exceeds the highest targets and therefore there is no imperative to seek more significant opportunities for growth opportunities.

**2.1.6 Recommended Changes**

Development Strategy and Policy Committee

Reinforce the strategy to support the proposed Residential Streetscape Zones to maintain desired neighbourhood character, while allowing for diversity and growth in separate limited areas.

**2.2 Clarence Park**

The Zoning in Clarence Park has been questioned in regard to strategic merit, streetscape character and implications for more focussed and intensive redevelopment.

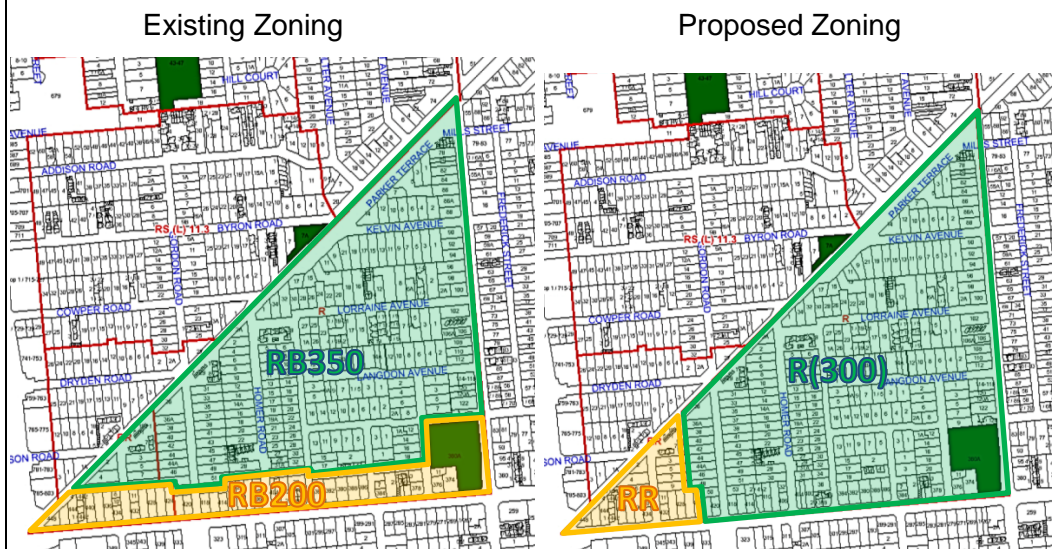
**2.2.1 DPA Proposals**

Clarence Park is currently covered by:

- predominately a Residential B350 Zone that provides for development up to 2 storey with minimum site area of 350m<sup>2</sup> per dwelling (and for example a street frontage of 7.5m per semi-detached dwelling and 9m per detached dwelling)
- along Cross Road a Residential B200 Zone that provides for development with minimum site area of 200m<sup>2</sup> per dwelling (and for example a street frontage of 7m per semi-detached dwelling and 7.5m per detached dwelling).

The DPA proposed a change to *SAPPL* zones:

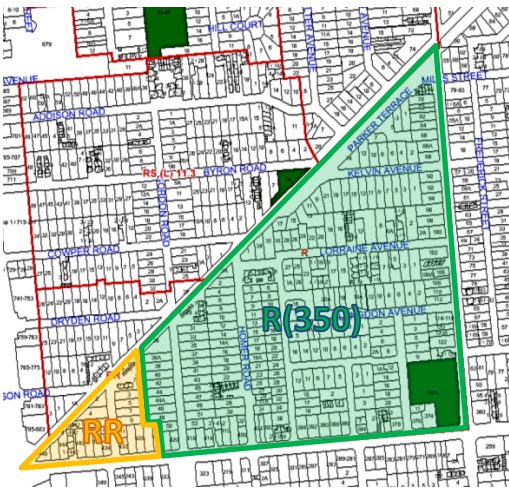
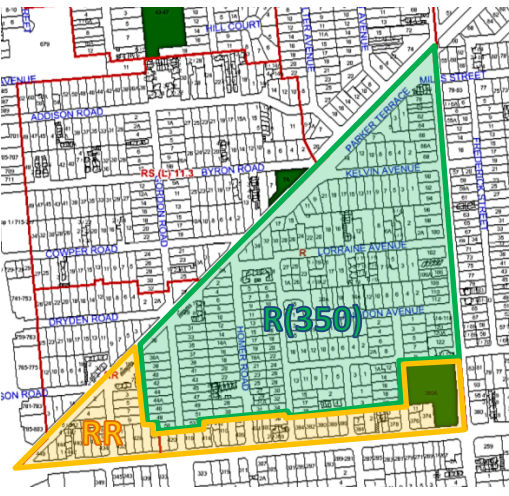
- Residential Zone for the majority of the area that provides for development up to 2 storey (with possible centralised 3<sup>rd</sup> storey on very large sites greater than 5,000m<sup>2</sup>) with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 8m per semi-detached dwelling and 10m per detached dwelling)
- on Cross Road adjacent to the train line a Residential Regeneration Zone that provides for development up to three storey with minimum site area of 230m<sup>2</sup> per dwelling (and for example a street frontage of 7m per semi-detached dwelling, 7.5m per detached dwelling and 22m overall for a residential flat building).



Open space areas are not separately zoned but are designated as community land, and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given the shortage of such space, to change the designation. Any changes to designation are subject to widespread public consultation and review by the State Government.

**2.2.2 Department of Planning Transport and Infrastructure**

The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured.  
Council's strategy and zone structure supports recognition of the widespread

	<p>areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone.</p> <p>Current Streetscape Zone areas require reaffirmation, and any potential additional areas will require rigorous justification. Equally reduction in Residential Zone or Residential Regeneration Zone areas will not be favoured and require justification. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.2.3	<p><b>Other Agency Feedback</b></p>
	<p>No other agencies are involved in this issue.</p>
2.2.4	<p><b>Community Feedback</b></p>
	<p>A limited number of resident owners (≈11) have expressed concern the proposed Residential Zone is not justified given the desirable existing character of the area, or certain streets, and that the reduced site area provision of 300m<sup>2</sup> will facilitate unwarranted and excessive redevelopment and change compared to the existing 350m<sup>2</sup> provision.</p> <p>There was no objection, and some support, for the Residential Regeneration Zone at the west end of Cross Road (not the part north of the train line which is addressed in section 2.2).</p>
2.2.5	<p><b>Council Review and Options</b></p>
	<p>The nature of the proposed Residential Zone is considered a reasonable balance of the strategic location adjacent to train and bus stations, existing long-term zoning and development, quantitative and qualitative character context and continued potential for in-fill development. This supports the existing detached dwelling and mixed character while providing the opportunity if the market or owners choose for modest redevelopment (eg primarily semi-detached dwellings). The Residential Zone represents a constrained transition of change.</p> <p>The <i>SAPPL</i> zone promotes growth and allows limited scope for the minimum site area provision to suit a given area. Therefore, given the community response, there may be the option of adopting the existing site area provision of 350m<sup>2</sup> to better reflect the area and maintain the current long-term situation.</p> <p>There is a further alternative option to extend the proposed Residential Regeneration Zone to reflect the section along Cross Road that is currently in the Residential B200 Zone.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>Option 1</p>  </div> <div style="text-align: center;"> <p>Option 2</p>  </div> </div> <p>The proposed Residential Regeneration Zone allows for up to 3 storey, but the acknowledgement of greater developer costs and limitations in providing 3</p>

storey development, existing relevant examples of development are primarily 2 storey and building envelope restrictions adjacent to adjoining zones, the Residential Regeneration Zone building heights could generally be limited to 2 storey. This could still realise proposed density but mitigate impacts from higher scale of development, and provide a transition to adjoining zones. In the more suitable corridor and precinct Policy Areas greater heights and density could be provided where appropriate.

The changes pose limited implications on development potential in the context of the overall growth targets and for the area.

Changes to expand the Residential Streetscape Zone into this area would not likely be supported by DPTI and would mean there would be negligible, if any, opportunity for redevelopment options or growth in the number of dwellings into the future.

Option	Zone	Area (Hectare)	Existing Dwellings	Gross Density	Potential Outcome	Potential Growth	Likely Growth
Existing	RB350	22.1	330	19	420	90	
	RB200	4.9	60	33	160	100	<b>45</b>
Proposed	R(300)	24.6	350	22	540	190	
	RR(230)	2.4	40	29	70	30	<b>55</b>
Option 1	R(350)	24.6	350	19	470	120	
	RR(230)	2.4	40	29	70	30	<b>35</b>
Option 2	R(350)	21.0	310	19	400	90	
	RR(230)	6.0	80	29	180	100	<b>50</b>

RR(230) area only includes that part in Clarence Park south of train line (see section 2.2 for the area in Black Forest)

Numbers are rounded for existing dwelling for simplicity and for growth numbers as they are estimates primarily derived to provide a comparison

Gross density is dwellings per hectare calculated by typical factor of 2/3 of net density based on zone minimum site areas

The likely growth to 2040 is based on DPTI methodology of 25% of potential

The provision for very large sites greater than 5,000m<sup>2</sup> to potentially encompass a centralised third storey was intended to recognise existing supported accommodation facilities (eg aged persons accommodation) where there may be a need for sensitive re-development flexibility and where the site size would mitigate external visibility of greater scale. No increase in dwelling density is suggested and the extra holding costs to amalgamate current smaller land parcels and higher construction costs of three storey suggest it is unlikely such new development would generally be viable or therefore widespread. In any event the details of the provision requires review to clarify its intent (refer to Section 2.13).

## 2.2.6 Recommended Changes

Development Strategy and Policy Committee

Revise the proposed zoning in Clarence Park in accord with Option 2 (majority in a Residential Zone with minimum site areas revised to 350m<sup>2</sup> and Residential Regeneration Zone along Cross Road with maximum height revised to up to 2 storey).

**2.3 Black Forest (South)**

The Zoning in Black Forest in Dryden Road has been questioned in regard to strategic merit, streetscape character and implications for more focussed and intensive redevelopment.

**2.3.1 DPA Proposals**

The Black Forest residential areas are currently predominately covered by:

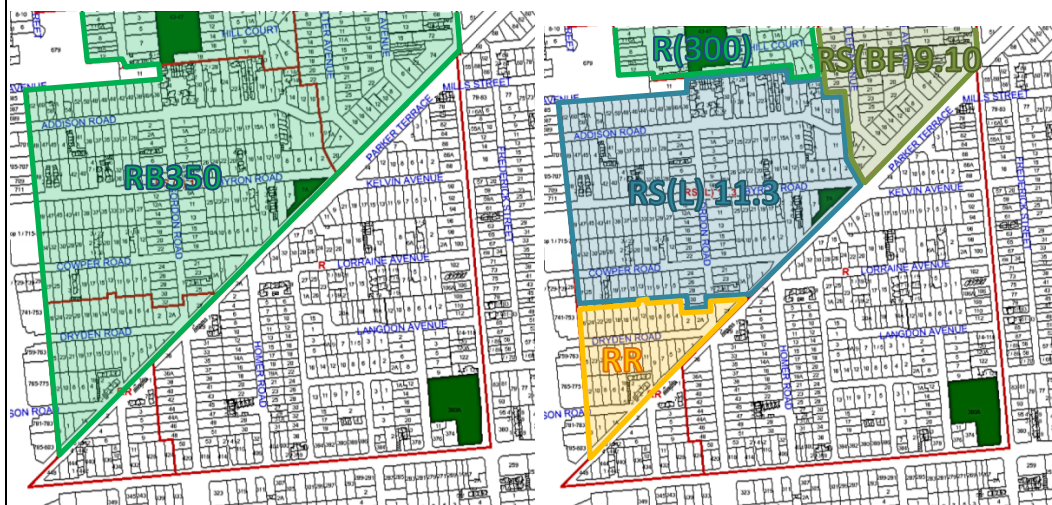
- Residential B350 Zone that provides for development up to 2 storey with minimum site area of 350m<sup>2</sup> per dwelling (and for example a street frontage of 7.5m per semi-detached dwelling and 9m per detached dwelling).

The DPA proposed a change to:

- Residential Streetscape (Landscape) Zone (Policy Area Black Forest 11.3) that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 800m<sup>2</sup> per dwelling (and for example a street frontage of 15.0m per dwelling)
- SAPPL Residential Zone that provides for development up to 2 storey (with possible centralised 3<sup>rd</sup> storey for very large sites greater than 5,000m<sup>2</sup>) with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 8m per semi-detached dwelling and 10m per detached dwelling)
- Residential Regeneration Zone around Emerson Road and Dryden Road adjacent to the train line that provides for development up to 3 storey with minimum site area of 230m<sup>2</sup> per dwelling (and for example a street frontage of 7m per semi-detached dwelling, 7.5m per detached dwelling and 22m overall for a residential flat building).

Existing Zoning

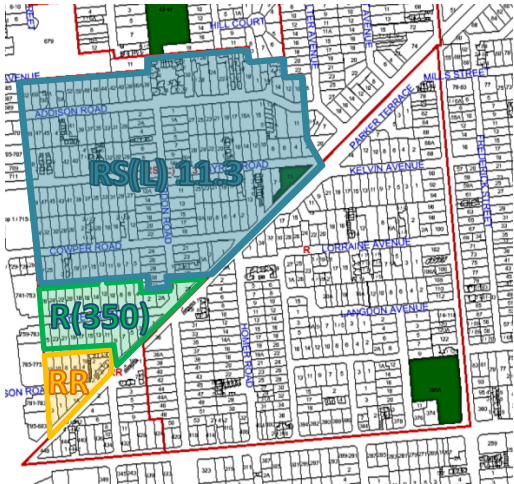
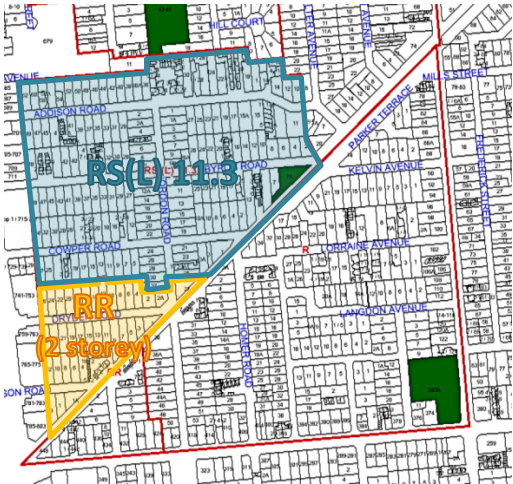
Proposed Zoning



Open space areas are not separately zoned but are designated as community land, and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given the shortage of such space, to change the designation. Any changes to designation are subject to widespread public consultation and review by the State Government.

**2.3.2 Department of Planning Transport and Infrastructure**

The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured. Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone. Current Streetscape Zone areas require reaffirmation, and any potential

	<p>additional areas will require rigorous justification. Equally reduction in Residential Zone or Residential Regeneration Zone areas will not be favoured and require justification. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.3.3	<p><b>Other Agency Feedback</b></p>
	<p>No other agencies are involved in this issue.</p>
2.3.4	<p><b>Community Feedback</b></p>
	<p>A limited number of residents/owners (≈5) within the Residential Streetscape Zones have indicated support for it but concern about the overall proposed zoning of the suburb.</p> <p>A large number of concerned residents/owners (≈23) in Dryden Road (none from Emerson Road) have raised significant concern about the Residential Regeneration Zone for Dryden Road. It is not considered justified given the desirable existing character of the road and that the proposed density up to 3 storey and site area 230m<sup>2</sup> will facilitate unwarranted and excessive major redevelopment and complete change compared to the existing RB350 Zone. A number have suggested the road should be included in the Residential Streetscape (Landscape) Zone.</p> <p>An enquiry by an owner in Dryden Road, who did not make a submission, indicated support for the opportunity the new zone would make to provide an additional small dwelling on their site, and another submission indicated some support for the proposed zone but a stronger preference for a Residential Zone that would better suit their circumstances.</p>
2.3.5	<p><b>Council Review and Options</b></p>
	<p>There is a potential option to extend the proposed Residential Zone in Clarence Park to include the Dryden Road area.</p> <p>The nature of the proposed Residential Zone is considered a reasonable balance of the strategic location adjacent to train and bus stations, existing long-term zoning and development, quantitative and qualitative character context and potential for in-fill development. This provides greater support for the existing character while providing the opportunity if the market or owners choose for modest redevelopment (eg semi-detached dwellings). The Residential Zone represents a constrained transition of change.</p> <p>The SAPPL zone promotes growth and allows limited scope for the minimum site area provision to suit a given area. Therefore there may be the option of adopting the existing site area provision of 350m<sup>2</sup> to maintain the current long-term situation.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>Option 1</p>  </div> <div style="text-align: center;"> <p>Option 2</p>  </div> </div>

The proposed Residential Regeneration Zone allows for up to 3 storey, but the acknowledgement of greater developer costs and limitations in providing 3 storey development, existing relevant examples of development are primarily 2 storey and building envelope restrictions adjacent to adjoining zones, the Residential Regeneration Zone building heights could generally be limited to 2 storey. This could still realise proposed density but mitigate impacts from higher scale of development, and provide a transition to adjoining zones. In the more suitable corridor and precinct Policy Areas greater heights and density could be provided where appropriate.

The changes pose limited implications on development potential in the context of the overall growth targets and for the area.

Changes to expand the Residential Streetscape Zone into this area is not supported by DPTI and would mean for any such areas there would be negligible, if any, opportunity for redevelopment options or growth in the number of dwellings into the future.

<b>Option</b>	<b>Zone</b>	<b>Area (Hectare)</b>	<b>Existing Dwellings</b>	<b>Gross Density</b>	<b>Potential Outcome</b>	<b>Potential Growth</b>	<b>Likely Growth</b>
Existing	RB350	2.8	55	19	85*	30	<b>10</b>
Proposed	RR(230)	2.8	55	29	85*	30	<b>10</b>
Option 1	R(350)	1.6	30	19	60*	10	
	RR(230)	1.2	25	29	35	10	<b>5</b>
Option 2	RR(230)	2.8	55	29	85*	30	<b>10</b>

RR(230) area only includes that part in Black Forest north of train line (see section 2.1 for area in Clarence Park)

Numbers are rounded for existing dwelling for simplicity and for growth numbers as they are estimates primarily derived to provide a comparison

Gross density is dwellings per hectare calculated by typical factor of 2/3 of net density based on zone minimum site areas - \* results adjusted to actual sites for such a small area (amalgamated sites in the RR(230) Zone would yield higher numbers)

The likely growth to 2040 is based on DPTI methodology of 25% of potential

### 2.3.6 Recommended Changes

Development Strategy and Policy Committee

Revise the proposed zoning in Black Forest (Dryden Road) in accord with Option 1 (Residential Zone with minimum site areas revised to 350m<sup>2</sup> and the Residential Regeneration Zone along Emerson Road with maximum height revised to 2 storey).

**2.4 Black Forest (North)**

The Zoning in Black Forest (north) adjacent to the tram has been questioned in regard to strategic merit, streetscape character and implications for more focussed and intensive redevelopment.

**2.1.1 DPA Proposals**

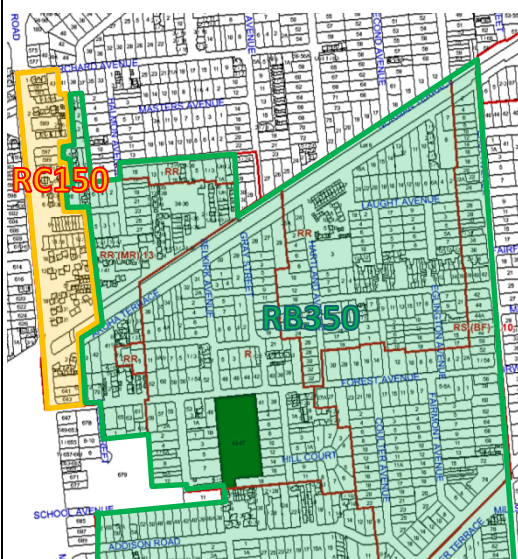
Black Forest (north) is currently covered by:

- predominately a Residential B350 Zone that provides for development up to 2 storey with minimum site area of 350m<sup>2</sup> per dwelling (and for example a street frontage of 7.5m per semi-detached dwelling and 9m per detached dwelling)
- along South Road a Residential C150 Zone that provides for development with minimum site area of 150m<sup>2</sup> per dwelling (refer to Section 2.4 for discussion on this area).

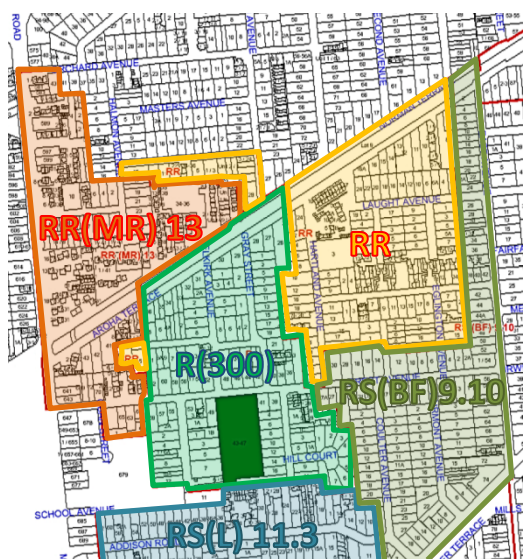
The DPA proposed a change to include:

- Residential Streetscape (Built Form) Zone (Black Forest (East) 9.10) that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 700m<sup>2</sup> per dwelling (and for example a street frontage of 16.0m per dwelling)
- SAPPL Residential Zone adjacent to the tram around Gray Street area that provides for development up to 2 storey (with possible centralised 3<sup>rd</sup> storey for very large sites greater than 5,000m<sup>2</sup>) with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 8m per semi-detached dwelling and 10m per detached dwelling)
- SAPPL Residential Regeneration Zone around Hartland Avenue, Dunrobin Street and Laught Avenue area that provides for development up to 3 storey with minimum site area of 230m<sup>2</sup> per dwelling (and for example a street frontage of 7m per semi-detached dwelling, 7.5m per detached dwelling and 22m overall for a residential flat building)
- Main Roads Policy Area provides for development up to 4 storey and minimum site area per dwelling of 140m<sup>2</sup> per separate dwellings and 100m<sup>2</sup> per dwelling in Residential Flat Buildings. Semi-detached and detached dwellings are non-complying in the Policy Area.

Existing Zoning



Proposed Zoning



While heights up to 3 storey are envisaged in the Residential Regeneration Zone, and up to 4 storey in the Main Roads Policy Area, where these areas

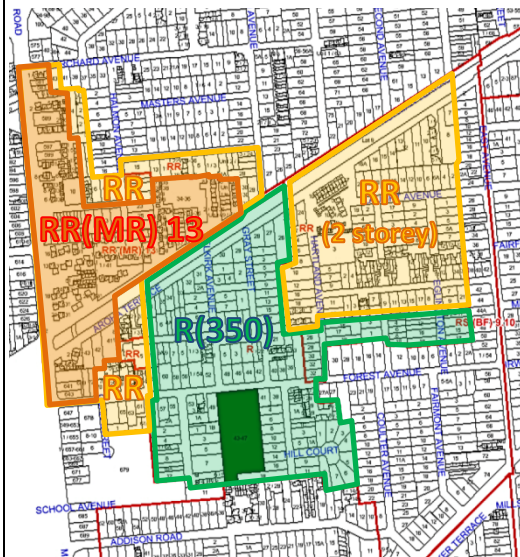
	<p>adjoin a different zone (Residential or Streetscape) walls above 2 storey are required to be setback additional distances to conform with a building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey and 19m for 4 storey (refer to Section 3.1).</p> <p>Open space areas are not separately zoned but are designated as community land, and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given the shortage of such space, to change the designation. Any changes to designation are subject to widespread public consultation and review by the State Government.</p>
2.4.2	<p>Department of Planning Transport and Infrastructure</p> <p>The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured. Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone.</p> <p>Current Streetscape Zone areas require reaffirmation, and any potential additional areas will require rigorous justification. Equally reduction in Residential Zone or Residential Regeneration Zone areas will not be favoured and require rigorous justification. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.4.3	<p>Other Agency Feedback</p> <p>No other agencies are involved in this issue.</p>
2.4.4	<p>Community Feedback</p> <p>A number of residents/owners (≈50) around Gray Street, Eric Avenue, Merlon Avenue and Forest Avenue have expressed concern the proposed Residential Zone is not justified given the desirable existing character of the streets and that the reduced site area provision of 300m<sup>2</sup> will facilitate unwarranted and excessive redevelopment and change compared to the existing RB350 Zone. Some have suggested the area would warrant change to a Residential Streetscape Zone. Also some were concerned about the Residential Regeneration Zone boundary and impact from increased scale of development to the rear of their properties.</p> <p>A number of residents/owners (≈35) around Hartland Avenue, Dunrobin Street, Eglington Avenue, Wilson Street, David Avenue, Busby Avenue and Forest Avenue have expressed concern the proposed Residential Regeneration Zone is not considered justified given the majority of existing desirable character and that the proposed density up to 3 storey and site area of 230m<sup>2</sup> will facilitate unwarranted and excessive major redevelopment and complete change compared to the existing RB350 Zone.</p> <p>One submission from Dunrobin Street indicated support for the proposed Residential Regeneration Zone.</p>
2.4.5	<p>Council Review and Options</p> <p>The nature of the proposed Residential Zone is considered a reasonable balance of the strategic location adjacent to the tram, existing long-term zoning and development, recognition of quantitative and qualitative character context and potential for in-fill development. This supports the existing character while providing the opportunity if the market or owners choose for modest redevelopment. The Residential Zone represents a constrained transition of change.</p> <p>The <i>SAPPL</i> zone promotes growth and allows limited scope for the minimum</p>

site area provision to suit a given area. Therefore there may be the option of adopting the existing site area provision of 350m<sup>2</sup> to maintain the current long-term situation.

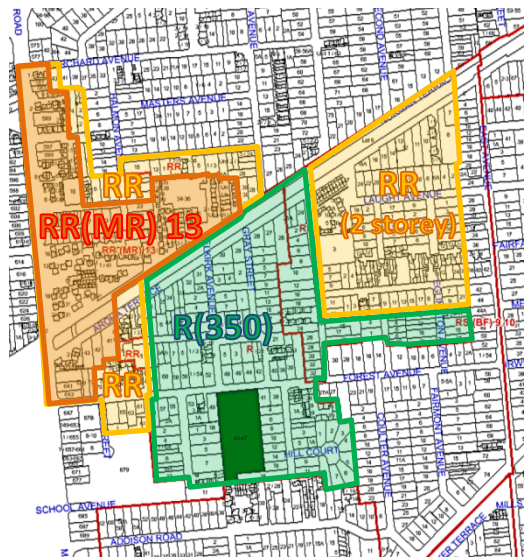
There are further alternative options to extend the proposed Residential Zone further to the west and reduce the Residential Regeneration Zone.

The proposed Residential Regeneration Zone allows for up to 3 storey, but the acknowledgement of greater developer costs and limitations in providing 3 storey development, existing relevant examples of development are primarily 2 storey and building envelope restrictions adjacent to adjoining zones, the Residential Regeneration Zone building heights could generally be limited to 2 storey. This could still realise proposed density but mitigate impacts from higher scale of development, and provide a transition to adjoining zones. In the more suitable corridor and precinct Policy Areas greater heights and density could be provided where appropriate. (refer to Section 2.5 in relation to South Road).

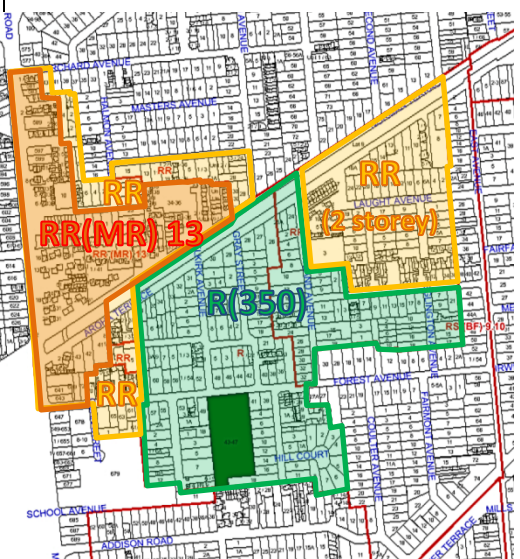
Option 1



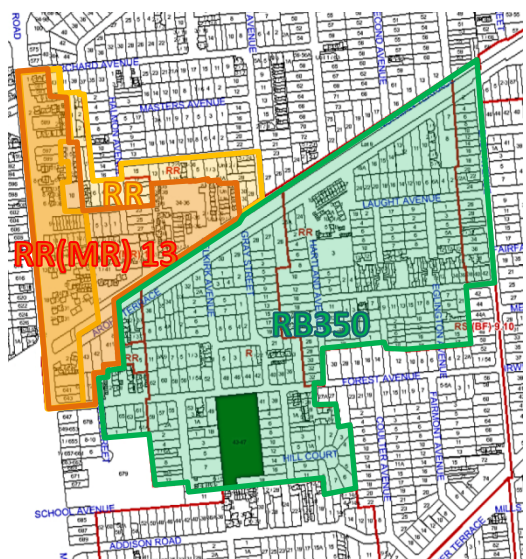
Option 2



Option 3



Option 4



The option to maintain a uniform character on both sides of local roads (eg Hartland Avenue, Dunrobin Street) rather than divide with two different zones has been the adopted preferred approach. Road separation may be better on

more major collector or main roads (eg East Avenue) where the road forms a larger separation both visually and practically. The Residential Zone, and less so the Residential Regeneration Zone, could therefore also possibly be extended across to East Avenue frontage.

The changes pose limited implications on development potential in the context of the overall growth targets and for the area but conversely would not optimise greater potential for housing diversity in this location.

Changes to expand the Residential Streetscape Zone in the area is not supported by DPTI and would mean for any such areas there would be negligible, if any, opportunity for redevelopment options or growth in the number of dwellings into the future.

Option	Zone	Area (Hectare)	Existing Dwellings	Gross Density	Potential Outcome	Potential Growth	Likely Growth
Existing	RB350	28.6	440	19	540	100	
	RC150	1.0	20	45	45	25	<b>30</b>
Proposed	R(300)	13.2	160	22	290	130	
	RR(230)	12.9	230	29	370	140	
	RR MR	3.5	70	67	230	160	<b>100</b>
Option 1	R(350)	14.9	200	19	280	80	
	RR(230)	11.2	190	29	320	130	
	RR MR	3.5	70	67	230	160	<b>90</b>
Option 2	R(350)	16.7	200	19	310	110	
	RR(230)	9.4	190	29	270	80	
	RR MR	3.5	70	67	230	160	<b>85</b>
Option 3	R(350)	18.3	220	19	340	120	
	RR(230)	7.8	170	29	220	50	
	RR MR	3.5	70	67	230	160	<b>80</b>
Option 4	R(350)	29.6	420	19	550	130	
	RR MR	1.8	40	67	120	80	<b>50</b>

RR(230) area only includes that part in Black Forest south of tram line (see section 2.4 for area along South Road)

Numbers are rounded for existing dwelling for simplicity and for growth numbers as they are estimates primarily derived to provide a comparison

Gross density is dwellings per hectare calculated by typical factor of 2/3 of net density based on zone minimum site areas

The likely growth to 2040 is based on DPTI methodology of 25% of potential

The provision for very large sites greater than 5,000m<sup>2</sup> to potentially encompass a centralised third storey was intended to recognise existing supported accommodation facilities (eg aged persons accommodation) where there may be a need for sensitive re-development flexibility and where the site size would mitigate external visibility of greater scale. No increase in dwelling density is suggested and the extra holding costs to amalgamate current smaller land parcels and higher construction costs of three storey suggest it is unlikely such new development would generally be viable or therefore widespread. In any event the details of the provision requires review to clarify its intent (refer to Section 2.13).

## 2.4.6 Recommended Changes

Development Strategy and Policy Committee

Revise the proposed zoning in Black Forest in accord with Option 1 (Residential Zone to include south side of Dunrobin Street and revised minimum site area to 350m<sup>2</sup> and the Residential Regeneration Zone maximum height to be revised to up to 2 storey).

**2.5 South Road (Everard Park and Black Forest)**

The Residential Regeneration Zone adjacent to South Road and the tram in Everard Park and Black Forest (north) has been questioned in regard to strategic merit, implications of greater height on adjoining Streetscape Zone and low-scale development and focus for intensive redevelopment given limitation on vehicle accessibility and potential increase in traffic on the local road network.

**2.4.1 DPA Proposals**

South Road in Everard Park and Black Forest is currently covered by:

- a Residential C150 Zone that provides for development up to 3 storey with minimum site area of 150m<sup>2</sup> per dwelling (and for example a street frontage of 7.0m per semi-detached dwelling, 7.5m per detached dwelling and 22m for multiple dwellings in a residential flat building)
- a Residential B350 Zone to the rear fringe that provides for development up to 2 storey with minimum site area of 350m<sup>2</sup> per dwelling (and for example a street frontage of 7.5m per semi-detached dwelling and 9m per detached dwelling).

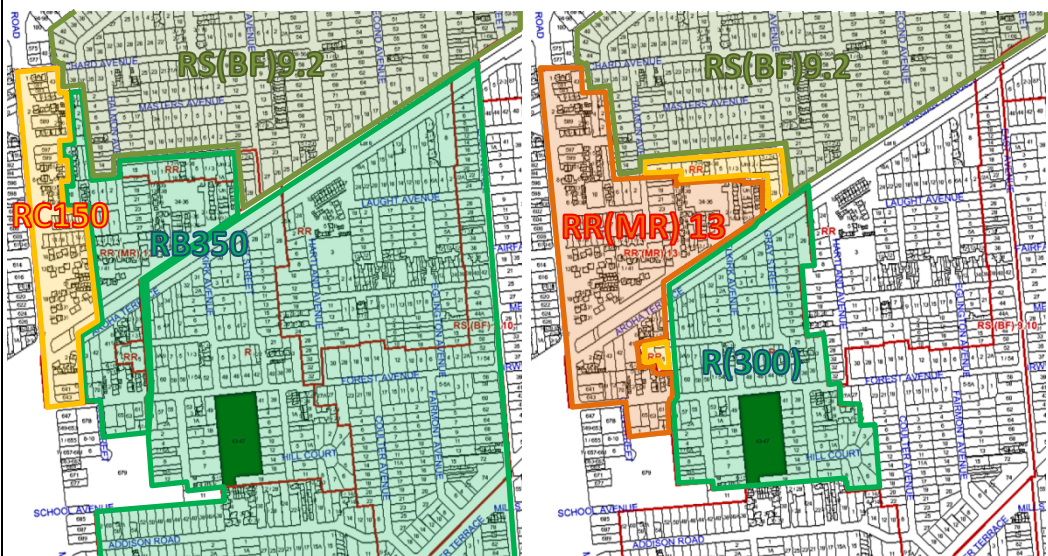
The DPA proposed a change to:

- a Residential Regeneration Zone that provides for development up to 3 storey (other than a limit of 2 storey to Ross Street) and minimum site area per dwelling of 230m<sup>2</sup> per separate dwellings (200m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) and 200m<sup>2</sup> per dwelling (170m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) for Residential Flat Buildings (and for example a street frontage of 7m per semi-detached dwelling, 9.0m per detached dwelling and 20m overall for a residential flat building)
- the South Road frontage and area to the rear and around the tram in a Main Roads Policy Area that provides for development up to 4 storey and minimum site area per dwelling of 180m<sup>2</sup> per separate dwellings (150m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) and 100m<sup>2</sup> per dwelling (80m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) for Residential Flat Buildings (and for example a street frontage of 7m per semi-detached dwelling, 9.0m per detached dwelling and 20m overall for a residential flat building). Semi-detached and detached dwellings are non-complying.

A proposed Residential Zone adjoins to the south of the tram line.

Existing Zoning

Proposed Zoning

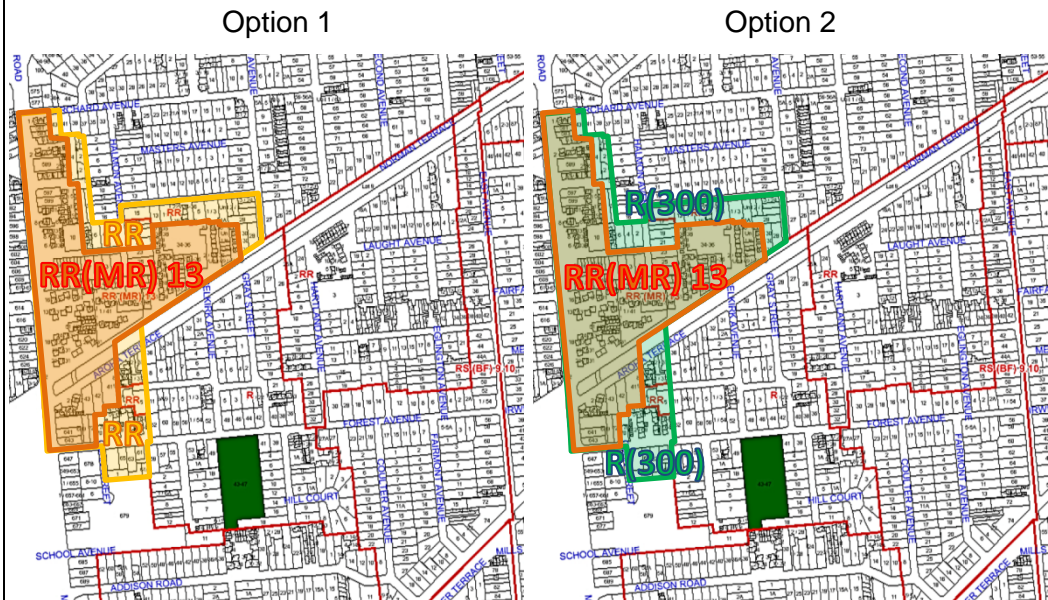


	<p>While heights up to 3 storey are envisaged in the Residential Regeneration Zone, and up to 4 storey in the Main Roads Policy Area, where these areas adjoin a different zone (eg Residential or Streetscape) walls above 2 storey are required to be setback additional distances to conform with a building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey and 19m for 4 storey (refer to Section 3.z), effectively limiting the height to 2 storey in these fringe areas.</p> <p>Open space areas are not separately zoned but are designated as community land, and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given the shortage of such space, to change the designation. Any changes to designation are subject to widespread public consultation and review by the State Government.</p>
2.5.2	Department of Planning Transport and Infrastructure
	<p>The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured.</p> <p>Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone, with a focus towards main roads.</p> <p>Reduction in Residential Zone or Residential Regeneration Zone areas will not be favoured and require rigorous justification. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.5.3	Other Agency Feedback
	No other agencies are involved in this issue.
2.5.4	Community Feedback
	<p>A number of residents/owners (≈20) around Halmon Avenue, Orchard Avenue and Ross Street have expressed concern the proposed Residential Regeneration Zone and particularly the Main Roads Policy Area is not appropriate on South Road, will have adverse impacts upon the desirable character of the adjoining residential streets and level of traffic through the adjacent local road network. There have been suggestions that if such proposals are to proceed, the areas behind South Road and adjacent to the Streetscape Zone be limited in height with a zone structure similar to the existing situation.</p>
2.5.5	Council Review and Options
	<p>The proposed Residential Regeneration Zone is considered suitable adjacent to South Road and the tram and an appropriate strategic location for higher density given public transport accessibility, existing long-term zoning and nature of development. The 30-Year Plan for Greater Adelaide shows the area adjacent to South Road as a potential regeneration area (Map E2 – Eastern Adelaide Directions). Also, recent intersection re-development, widening and slip lane along most of this frontage enhances its suitability for residential development. Such zoning also reflects and reinforces the nature of existing higher density residential development. The 'Overlay - Noise and Emissions' policies are appropriately applied in this scenario and will mitigate adverse implications. Alternative commercial development is not highly suitable and could potentially entail a higher intensity of built form, parking and traffic.</p> <p>The proposed Residential Regeneration Zone and Main Roads Policy Area allows for up to 3 and 4 storey development. Recognising the additional costs for such construction, existing examples of development at such density on smaller sites is typically two storey and the building envelope limits heights adjacent to adjoining zones, the scale of development in the fringe areas of the</p>

Residential Regeneration Zone could generally be limited to two storey. This could still realise proposed density but mitigate impacts from higher scale of development, and provide a suitable transition to adjoining zones. In the more suitable Main Roads Policy Area along South Road and adjacent to the tram the greater height of 4 storey could reasonably be maintained. The building envelope and increased setbacks mitigate against overbearing building bulk and overshadowing, and as with all development, Council-wide policy reduces unreasonable overlooking.

The change to the general height limit for the Residential Regeneration Zone provides a clear proposal for lower scale 2 storey height in the fringe (non-corridor) areas as a transition to adjoining areas but maintains the opportunity for higher intensity, diversity and development potential.

The fringe areas could alternatively be included as part of the Residential Zone which limits height generally to 2 storey but also would limit density by virtue of the larger site area requirements of 300m<sup>2</sup> (or 350m<sup>2</sup>). The main concern has been in relation to height and visual impacts more so than density.



Option	Zone	Area (Hectare)	Existing Dwellings	Gross Density	Potential Outcome	Potential Growth	Likely Growth
Existing	RB350	8.3	240	19	240*	0	
	RC150	5.0	170	45	225	55	15
Proposed	RR(200)	1.0	15	33	30	15	
	RR MR	12.3	395	67	820	425	110
Option 1	RR(200)	3.1	90	33	100	10	
	RR MR	10.3	320	67	690	370	95
Option 2	R(350)	3.1	90	19	90*	0	
	RR MR	10.3	320	67	690	370	90

R(350) area only includes that part adjacent to the area around South Road and tram  
Numbers are rounded for existing dwelling for simplicity and for growth numbers as they are estimates primarily derived to provide a comparison  
Gross density is dwellings per hectare calculated by typical factor of 2/3 of net density based on zone minimum site areas  
The likely growth to 2040 is based on DPTI methodology of 25% of potential

The potential increase in dwelling units could be in the order of 60 along South Road in the area between Orchard Avenue and Eurilpa Avenue that may need

to egress the area to the north (eg city) and traverse through Everard Park. In accord with widely accepted guides to traffic generation it is estimated 360 movements per day may be generated, half egressing properties and possibly half moving to the north, meaning potentially 90 extra movements in the local network. The adjacent streets in the local network currently accommodate levels between 200 to 400 movements per day. Additional development in the area along the tram would generate some further movements through the local network depending on the extent and nature of development. The anticipated overall levels from a traffic management view point are not considered to be an unreasonable increase, a compromise to the capacity of the local network or unmanageable.

<b>2.5.6</b>	<b>Recommended Changes</b>
	Development Strategy and Policy Committee
	Revise the proposed zoning around South Road and tram (Everard Park and Black Forest) in accord with Option 1 (Residential Regeneration Zone – Major Roads Policy Area remain at 4 storeys but the fringe areas to the rear of the corridor in the Residential Regeneration Zone revised to provide for a maximum height up to 2 storey).

**2.6 Anzac Highway (Everard Park)**

The Residential Regeneration Zone along Anzac Highway in Everard Park has been questioned in regard to strategic merit, implications of greater height on adjoining Streetscape Zone low-scale development and focus for intensive redevelopment with implications on traffic safety and potential increase in traffic on the local road network.

**2.6.1 DPA Proposals**

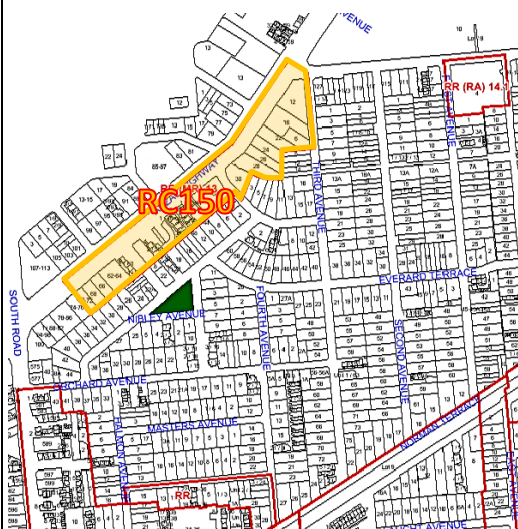
Anzac Highway in Everard Park is currently covered by:

- a Residential C150 Zone that provides for development up to 3 storey with minimum site area of 150m<sup>2</sup> per dwelling (and for example a street frontage of 7.0m per semi-detached dwelling, 7.5m per detached dwelling and 22m for multiple dwellings in a residential flat building)
- a Residential Streetscape (Built Form) Zone in behind that provides for development up to 2 storey with minimum site area of 800m<sup>2</sup> per dwelling and street frontage of 18m – essentially maintaining the existing density and building form.

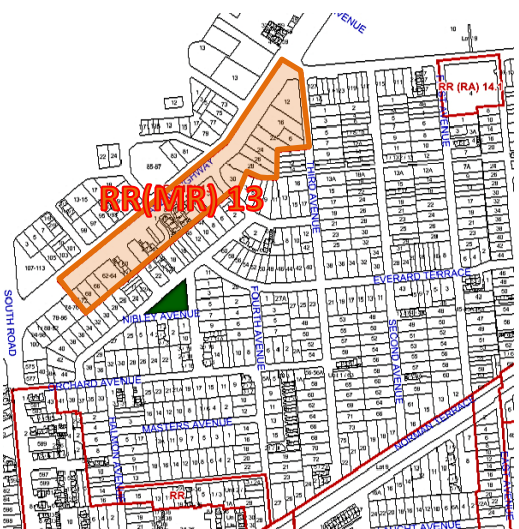
The DPA proposed a change to:

- a Residential Regeneration Zone (Main Roads Policy Area 13) that provides for development up to 4 storey and minimum site area per dwelling of 180m<sup>2</sup> per separate dwellings (150m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) and 100m<sup>2</sup> per dwelling (80m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) for residential flat buildings (and for example a street frontage of 7m per semi-detached dwelling, 9.0m per detached dwelling and 20m overall for a residential flat building). Semi-detached and detached dwellings are non-complying.

Existing Zoning



Proposed Zoning



While heights up to 4 storey are envisaged in the Residential Regeneration Zone (Main Roads Policy Area 13), where these areas adjoin a different zone (eg Streetscape) walls above 2 storey are required to be setback additional distances to conform with a building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey and 19m for 4 storey (refer to Section 3.1), effectively limiting the height of building adjacent to the rear boundary.

Open space areas are not separately zoned but are designated as community land, and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given

	the shortage of such space, to change the designation. Any changes to designation are subject to widespread public consultation and review by the State Government.
2.6.2	Department of Planning Transport and Infrastructure
	<p>The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured.</p> <p>Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone, with a focus towards main roads.</p> <p>Reduction in Residential Zone or Residential Regeneration Zone areas will not be favoured and require rigorous justification. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.6.3	Other Agency Feedback
	No other agencies are involved in this issue.
2.6.4	Community Feedback
	<p>A number of residents/owners (~15) around Hillsley Avenue, Grove Avenue and Third Avenue have expressed concern the proposed Residential Regeneration Zone, and particularly the Main Roads Policy Area, is not appropriate on Anzac Highway and will have adverse impacts upon the desirable character of the adjoining residential streets and level of traffic through the adjacent local road network.</p> <p>There have been suggestions that if such proposals are to proceed, the Zone be limited in height similar to the existing situation.</p> <p>A suggestion has also been raised that properties at the northern end of Third Avenue fronting onto the Residential Regeneration Zone (ie Hungary Jacks and Kentucky Fried Chicken) should have a more flexible zone than Residential Streetscape (Built Form) Zone to recognise the direct interface across the street with the Residential Regeneration Zone and to provide a transition in character and amenity.</p> <p>Several submissions (~3) from Anzac Highway indicated support for the proposed Residential Regeneration Zone, and in 2 cases the expansion of the zone to include additional properties on west side of Third Avenue. One submission from Hillsley Avenue indicated some support for the proposed Residential Regeneration Zone on Anzac Highway, providing the character and housing in the streets behind was maintained.</p>
2.6.5	Council Review and Options
	<p>The proposed Residential Regeneration Zone – Main Roads Policy Area is considered suitable adjacent to Anzac Highway and an appropriate strategic location for higher density given public transport accessibility, existing long-term similar zoning and nature of development.</p> <p>The '<i>Overlay - Noise and Emissions</i>' policies are appropriately applied in this scenario and will mitigate adverse living implications. Alternative commercial development is not highly suitable and could potentially entail a higher intensity of built form, parking and traffic implications.</p> <p>The change to the general height limit for the area from up to 3 to 4 storey provides an opportunity for optimising the potential density. More than 2 storey construction imposes extra costs and a commensurate increase in density is required to compensate. The height relates appropriately with the wide Anzac Highway boulevard frontage.</p> <p>The main concern for adjoining residents to the rear has been in relation to the 4 storey height and visual impacts rather than density necessarily. The</p>

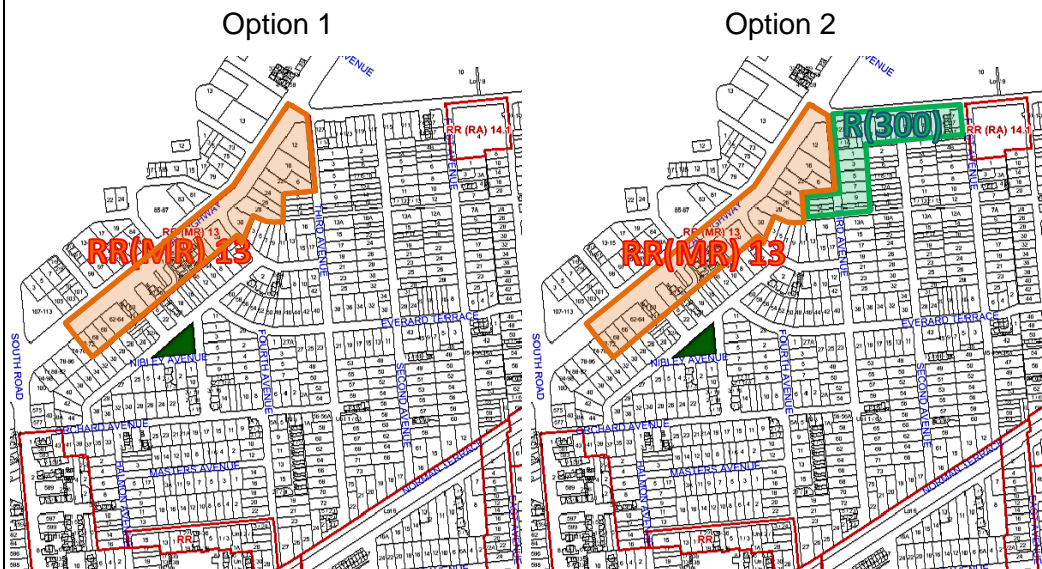
potential extra height could present greater visual intrusion of views but direct impacts are mitigated by the building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey and 19m for 4 storey (refer to Section 3.1), effectively limiting the height of building adjacent to the rear boundary. The building envelope and increased setbacks mitigate against overbearing building bulk and overshadowing, and as with all development, Council-wide policy reduces unreasonable overlooking.

The height could be limited to up to 3 storey to reflect the existing situation and concerns but the building envelope affords reasonable mitigation of extra height impacts and allow more optimal scope for development.

The further expansion of the Residential Regeneration Zone with frontage to the north end of Third Avenue is not appropriate and would extend the different character further into the adjoining Streetscape Zone.

The frontage of Third Avenue and Leader Street adjacent to their junction does relate to existing commercial development and higher density residential zoning and development potential. A Residential Zone could form a transition and better reflect the range of smaller sites in this specific area with the creek to the south and bakery to the east providing a suitable demarcation between zones.

This option introduces a policy change not currently included in the proposed changes and could only be contemplated if there were re-consultation on the DPA.



Option	Zone	Area (Hectare)	Existing Dwellings	Gross Density	Potential Outcome	Potential Growth	Likely Growth
Existing	RC150	4.2	60	45	180	120	30
Proposed	RR MR	4.2	60	67	280	220	55
Option 1	RR MR	4.2	60	50	210	150	40
Option 2	RR MR	4.2	60	50	210	150	
	R(300)	2.1	30	20	40	10	45

Numbers are rounded for existing dwelling for simplicity and for growth numbers as they are estimates primarily derived to provide a comparison  
Gross density is dwellings per hectare calculated by typical factor of 2/3 of net density based on zone minimum site areas  
The likely growth to 2040 is based on DPTI methodology of 25% of potential

The potential increase in dwelling units along South Road in the area between Orchard Avenue and Eurilpa Avenue that may choose to egress the area to the north (eg city) and traverse through Everard Park could be in the order of 60 dwellings. In accord with widely accepted guide to traffic generation it is estimated 360 movements per day may be generated, half exiting properties and possibly half to the north, meaning potentially 90 extra movements in the local network. The adjacent streets in the local network currently accommodate levels between 200 to 400 movements per day. Additional development in the area along the tram would generate some further movements through the local network depending on the extent and nature of development. The anticipated overall levels from a traffic management view point are not considered to be an unreasonable increase, a compromise to the capacity of the local network or unmanageable.

**2.6.6 Recommended Changes**

Development Strategy and Policy Committee

Maintain Residential Regeneration Zone along Anzac Highway in accord with Option 1, including height up to 4 storey.  
If re-consultation of parts of the DPA occurs, include the option to revise the proposed zoning around Anzac Highway, Third Avenue and Leader Street in accord with Option 2 (Residential Regeneration Zone – Major Roads Policy Area along Anzac Highway and adjacent area along north part of Third Avenue and west part of Leader Street revised to a Residential Zone with minimum site area of 300m<sup>2</sup>).

**2.7 Unley (Charles Street, Mary Street and Cleland Avenue)**

The previous industrial area around Charles Street, Mary Street and Cleland Avenue in Unley was re-zoned in 2000 for medium density residential development up to 3 storey. The proposal for change to a Residential Regeneration Zone – Renewal Policy Area was intended to update zoning in accord with new SAPPL template and maintain similar key parameters. The updated zone has been questioned in regard to general concern about increased density, inappropriate variation in key parameters along Mary Street and a request for inclusion of an additional adjacent area to the south of Mary Street.

**2.7.1 DPA Proposals**

The Charles Street, Mary Street and Cleland Avenue precinct in Unley is currently covered by:

- Residential C120-180 Zone that provides for development up to 3 storey (and 2 storey with roof attic) with minimum site area of 140m<sup>2</sup> per dwelling (120m<sup>2</sup> for sites greater than 2,000m<sup>2</sup>) and maximum site area of 180 m<sup>2</sup> in Area 1 and 2 along Charles Street and 180m<sup>2</sup> (minimum) and 220 m<sup>2</sup> (maximum) in Area 3 along Mary Street and Cleland Avenue (and for example a street frontage of 7.0m per semi-detached dwelling, 7m per detached dwelling and 22m for multiple dwellings in a residential flat building).


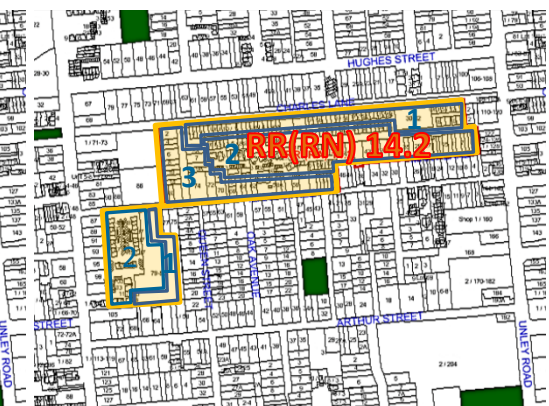
The DPA proposed a change to:

- SAPPL Residential Regeneration Zone (Renewal Policy Area 14.2) that provides for development up to 3 storey (and 2 storey with roof attic) with minimum site area per dwelling of 140m<sup>2</sup> generally and 100m<sup>2</sup> per dwelling in a residential flat building (120m<sup>2</sup> and 90m<sup>2</sup> respectively for sites greater than 2,000m<sup>2</sup>) and maximum site area of 180 m<sup>2</sup> for all housing types in all of the Policy Area and Areas 1, 2 and 3 (and for example a street frontage of 8m per dwelling or 20m overall for a residential flat building). Semi-detached and detached dwellings are non-complying.



**2.7.2 Department of Planning Transport and Infrastructure**

The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured. Council’s strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone. Expansion of the Residential Regeneration Zone areas would likely be

	favoured. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.
2.7.3	Other Agency Feedback
	No other agencies are involved in this issue.
2.7.4	Community Feedback
	<p>A small number of resident owners (≈2) have expressed some general concern about the proposed increased density of development and more particularly the notable increase in density for development along Mary Street and Cleland Avenue and exclusion of semi-detached and detached dwellings (ie Area 3).</p> <p>The owners of 79-85 Mary Street, on the south side of Mary Street, have highlighted it is currently disposed as a meeting hall and while in the Residential Streetscape (Built Form) Zone has been recognised as a large and non-residential site where greater potential is recognised, and has been approved, for redevelopment with 93 dwellings in buildings up to 3 storey. Accordingly, it has been requested the site, and adjoining unit developments to the west adjacent to King William Road, be included in the Residential Regeneration Zone – Renewal Policy Area 14 to reflect this situation, with a suggestion the core western area allow up to 4 storey with 2 storey along the eastern fringe.</p>
2.7.5	Council Review and Options
	<p>The nature of the proposed Residential Regeneration Zone – Renewal Policy Area 14 largely reflects the existing long-term zoning. Increased density through reduction in average site areas per dwelling for residential flat buildings appropriately favours this more efficient and functional form of development.</p> <p>There is a notable difference for Area 3 in density (ie 100m<sup>2</sup> compared with previous 180m<sup>2</sup>) and exclusion of semi-detached and detached dwellings which may not appropriately recognise the existing situation or direct relationship with the nature of development in Cleland Avenue and the Residential Streetscape (Built Form) Zone along the rest of Mary Street.</p> <p>Accordingly, it is an appropriate option for the minimum site area per dwelling for Area 3 be revised to 180m<sup>2</sup>, maximum site area of 220 m<sup>2</sup> and semi-detached and detached be removed from being non-complying in Area 3 in the Policy Area 14.2.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>Option 1</p>  </div> <div style="text-align: center;"> <p>Option 2</p>  </div> </div> <p>The request to include the additional area at the south west end of Mary Street has some logic and it was earmarked to be contemplated as part of the future King William Road corridor rezoning. The Option 2 to include an additional area for change in the DPA could only be considered if further public consultation were to be undertaken on amended DPA proposals.</p>

If contemplated, it is suggested the eastern fringe be included in Area 1 where heights are limited to 2 storey to provide a suitable transition and the western core area included in Area 3 that provides up to 3 storey development. Development greater than 3 storey is inconsistent with the remainder of the precinct. Preliminary investigations in relation to King William Road suggest 3 storey may be appropriate.

The changes reflect the nature of existing and reasonable future development and optimise an opportunity for suitable areas of increased density. The implications on development potential are positive but limited in the context of the overall growth targets.

<b>Option</b>	<b>Zone</b>	<b>Area (Hectare)</b>	<b>Existing Dwellings</b>	<b>Gross Density</b>	<b>Potential Outcome</b>	<b>Potential Growth</b>	<b>Likely Growth</b>
Existing	Area 1	1.4	50	60	80	30	
RC120-180	Area 2	2.7	110	60	160	50	
	Area 3	1.5	60	30	60	0	<b>20</b>
Proposed	Area 1	1.4	50	60	80	30	
RR RN 14.2	Area 2	2.7	110	60	160	50	
	Area 3	1.5	60	60	80	20	<b>25</b>
Option 1	Area 1	1.4	50	60	80	30	
RR RN 14.2	Area 2	2.7	110	60	160	50	
	Area 3	1.5	60	30	60	0	<b>20</b>
Option 2	RR RN	5.6	220	50	320	100	
RR RN 14.2	Area 1	0.4	5	60	25	20	
	Area 2	1.5	60	60	80	20	<b>35</b>

Numbers are rounded for existing dwelling for simplicity and for growth numbers as they are estimates primarily derived to provide a comparison

Gross density is dwellings per hectare calculated by typical factor of 2/3 of net density based on zone minimum site areas

The likely growth to 2040 is based on DPTI methodology of 25% of potential

The inclusion of the area to the south of Mary Street also raises the question about the future zoning of the area to the north, ie Light Industry Zone and Council depot. The current non-residential and long term land uses suggest there is not a similar priority or option for change and that a greater consideration of the long-term implications for future development is required, eg residential zoning potentially compromises the operation of the existing non-residential uses and a suitable long-term future re-development has not been fully explored. As mentioned, it is considered more appropriate this area be contemplated as part of the future King William Road corridor re-zoning investigations.

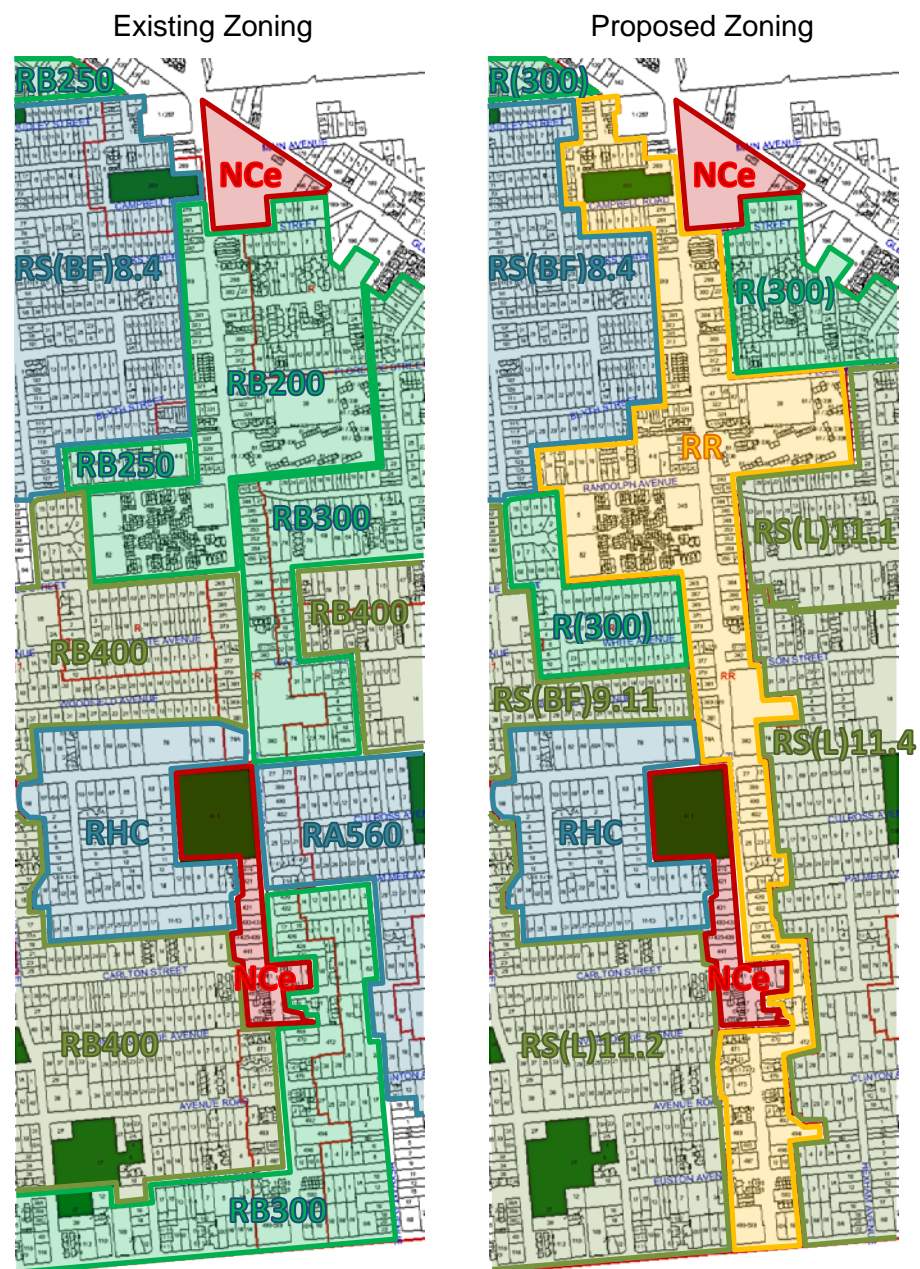
## 2.7.6 Recommended Changes

### Development Strategy and Policy Committee

Revise the proposed zoning in Unley (Charles Street) in accord with Option 1 (Residential Regeneration Zone – Renewal Policy Area with minimum site areas in Area 3 revised to 180m<sup>2</sup>, maximum site area of 220 m<sup>2</sup> and semi-detached and detached dwellings be removed from being non-complying development.

If re-consultation of parts of the DPA occurs, include the option to revise the proposed zoning in Unley (Charles Street) in accord with Option 2 (Residential Regeneration Zone – Renewal Policy Area 14.2 to include the area to the south of Mary Street as part of Area 1 along the eastern fringe and Area 2 for the western major core area.

<b>2.8</b>	<b>Fullarton Road (Parkside, Fullarton, Highgate and Myrtle Bank)</b>
	<p>The Residential Regeneration Zone along Fullarton Road for medium density development up to 3 storey in height, subject to a building envelope to the zone interface (30 degrees from 3 metres above ground level), has generally been accepted, although a few specific issues have been raised.</p>
2.8.1	DPA Proposals
	<p>The subject area along and around Fullarton Road is currently covered by:</p> <ul style="list-style-type: none"> <li>▪ Residential B200/B250, B300 and B400 Zones that provide for development up to 2 storey with minimum site area of 200/250, 300 and 400m<sup>2</sup> per dwelling (and for example a street frontage of 7.0, 7.5 and 9.0m per semi-detached dwelling and 7.5, 9.0 and 12.5m per detached dwelling and 22m overall for multiple unit group dwellings or residential flat building)</li> <li>▪ Residential A560 Zone that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 560m<sup>2</sup> per dwelling (and for example a street frontage of 15.0m per dwelling and 30m overall for multiple unit group dwellings or residential flat building)</li> <li>▪ Residential Streetscape (Built Form) Zone (Parkside (South) 8.4) that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 500m<sup>2</sup> per dwelling (and for example a street frontage of 15.0m per dwelling)</li> <li>▪ Residential Historic Conservation Zones (Fullarton Roseberry Estate) that provides for development up to 2 storey (within roof or to the rear) with minimum site area of 900m<sup>2</sup> per dwelling (and for example a street frontage of 18m per dwelling)</li> <li>▪ Neighbourhood Centre that provides for a range of retail and commercial development up to 2 storey</li> </ul> <p>The subject area along and around Fullarton Road is proposed to be covered by:</p> <ul style="list-style-type: none"> <li>▪ Residential Zone that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 8.0m per semi-detached dwelling, 10.0m per detached dwelling and 15m and 22m overall for multiple unit group dwellings or residential flat building)</li> <li>▪ Residential Regeneration Zone that up to 3 storey with minimum site area of 230m<sup>2</sup> and 200m<sup>2</sup> for residential flat buildings per dwelling (200m<sup>2</sup> and 170m<sup>2</sup> for sites greater than 2,000m<sup>2</sup>) (and for example a street frontage of 7m per semi-detached dwelling, 7.5m per detached dwelling and 22m overall for a residential flat building)</li> <li>▪ Residential Streetscape (Landscape) Zone (Policy Area Fullarton (North) 11.1, Highgate 11.2 and Myrtle Bank 11.4) that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 600, 700 and 800m<sup>2</sup> per dwelling (and for example a street frontage of 15.0, 16.0 and 17.0m per dwelling)</li> <li>▪ Residential Streetscape (Built Form) Zone (Parkside (South) 8.4 and Fullarton 9.11) that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 500 and 700m<sup>2</sup> per dwelling (and for example a street frontage of 15.0 and 16.0m per dwelling)</li> <li>▪ Residential Historic Conservation Zones (Fullarton Roseberry Estate) that provides for development up to 2 storey (within roof or to the rear) with minimum site area of 900m<sup>2</sup> per dwelling (and for example a street frontage of 18m per dwelling)</li> <li>▪ Neighbourhood Centre that provides for a range of retail and commercial development up to 2 storey</li> </ul>



While heights up to 3 storey are envisaged in the Residential Regeneration Zone, where these areas adjoin a different zone (Residential or Streetscape) walls above 2 storey are required to be setback additional distances to conform with a building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey and 19m for 4 storey (refer to Section 3.1), effectively limiting the height to 2 storey at these interface areas.

Open space areas are not separately zoned but are designated as community land and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given the shortage of such space, to change the designation. Any changes to designation are subject to widespread public consultation and review by the State Government.

2.8.2	Department of Planning Transport and Infrastructure
	The limitation of the Streetscape Zones, wider application of the Residential

	<p>Zone and optimisation of the Residential Regeneration Zone is favoured.</p> <p>Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone, with a focus towards main roads.</p> <p>No change in the area of the Residential Zone or Residential Regeneration Zone or density is proposed. The DPTI and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.8.3	Other Agency Feedback
	No other agencies are involved in this issue.
2.8.4	Community Feedback
	<p>A small number of residents/owners (≈10) adjacent to Fullarton Road have expressed views including support and some raising concerns regarding various issues relative to the respective proposed Residential Streetscape Zone, Residential Zone and particularly Residential Regeneration Zone.</p> <p>The Streetscape Zone character protection is widely supported. However, in one instance such a property adjoins the Fullarton Road Regeneration Zone, is currently in a Residential B400 Zone and would receive reduced options for development but greater impacts upon its amenity.</p> <p>The Residential Zone and the Residential Regeneration Zone along Fullarton Road are generally considered reasonable. Some concerns were raised about building height, density, increased traffic and access problems. The building envelope to the rear mitigates building impacts at the zone interface.</p> <p>A matter raised a few times is concern for the protection of public open space. As clarified above all such open space is designated Community Land and not able to be developed.</p>
2.8.5	Council Review and Options
	<p>The proposed Residential Regeneration Zone along Fullarton Road and adjacent Residential Zone and Streetscape Zone is considered to better reflect the nature of development and appropriate development opportunity. Fullarton Road is as an appropriate strategic location for higher density development given public transport accessibility, existing nature of development and avoidance of impact on surrounding neighbourhood areas.</p> <p>The <i>'Overlay - Noise and Air Emissions'</i> policies are appropriately applied in this scenario and will mitigate adverse amenity impacts.</p> <p>While heights up to 3 storey are envisaged in the Residential Regeneration Zone, where these areas adjoin a different zone (Residential or Streetscape) walls above 2 storey are required to be setback additional distances to conform with a building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey (refer to Section 3.1), effectively limiting the height to 2 storey in these interface areas.</p> <p>Further, recognising the additional costs for higher construction, existing examples of development at such density on smaller sites areas is often 2 storey, the scale of development in the Residential Regeneration Zone may not necessarily always be 3 storey but may include a range from 2 storey to 3 storey in different circumstances.</p> <p>The possible change to the general height limit for the Residential Regeneration Zone to 2 storey would provide a clear proposal for lower scale height in the precinct areas (refer to Sections 2.2, 2.3 and 2.4). The opportunity for up to 3 storey development as originally proposed fronting Fullarton Road is still considered reasonable. This distinction could be reflected in Principles of Development Control 8 and 12 in the Residential</p>

	<p>Regeneration Zone.</p> <p>The potential increase in dwellings would not necessarily be affected by a reduction in height.</p> <p>The change and relationship for properties in the Streetscape Zone adjoining the Residential Regeneration Zone along Fullarton Road is appreciated. The general policy provides a building envelope transition, effectively limiting height to 2 storey adjacent to these areas, and other design provisions to mitigate undue overshadowing and overlooking for example. A reasonable transition and amenity should be maintained.</p> <p>In the specific case raised, the site is 1300m<sup>2</sup> with a bungalow dwelling to the front, and tennis court to the rear. While the Streetscape (Landscape) Zone 11.2 nominates site areas of 700m<sup>2</sup> there may be a prospect for a well designed proposal for a hammerhead dwelling to the rear that would allow for development potential but maintain the aims of the zone and character of the streetscape. Maintaining a regular zone boundary alignment is beneficial and avoids creation of complicated interfaces and potential additional impacts.</p>
<p><b>2.8.6</b></p>	<p><b>Recommended Changes</b></p>
	<p>Development Strategy and Policy Committee</p> <p>Revise the proposed Residential Regeneration Zone Principles of Development Control 8 and 12 to provide for height up to 2 storey generally but maintain up to 3 storey fronting Fullarton Road and the other specific height limits for the Policy Areas.</p>

**2.9 Fullarton (Aragon Street)**

The Residential Zone has been applied to pockets in Fullarton reflective of the character of suitable areas and existing zoning with little issue raised. A specific issue has been noted in Aragon Street (a dead end street off Glen Osmond Road) where a minor adjustment is warranted to support an appropriate outcome for the street.

**2.9.1 DPA Proposals**

The particular Fullarton precinct is currently covered by:

- a Residential B200 Zone that provides for development up to 2 storey with minimum site area of 200m<sup>2</sup> per dwelling (and for example a street frontage of 7.0m per semi-detached dwelling and 7.5m per detached dwelling)
- a Residential B300 Zone that provides for development up to 2 storey with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 7.5m per semi-detached dwelling and 9m per detached dwelling).

The DPA proposed a change to a *SAPPL* Residential Zone to reflect the nature of development by:

- a Residential Zone in the eastern area that provides for development up to 2 storey with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 8m per semi-detached dwelling and 10m per detached dwelling)
- a Residential Streetscape (Landscape) Zone – Policy Area 11.1 to better reflect the area to the west and south that provides for development up to 2 storey (in roof or to the rear) with minimum site area of 600m<sup>2</sup> per dwelling (and for example a minimum street frontage of 15m per dwelling).



**2.9.2 Department of Planning Transport and Infrastructure**

The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured. Council’s strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone. Current Streetscape Zone areas require reaffirmation, but Residential Zone areas are favoured. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.

**2.9.3 Other Agency Feedback**

No other agencies are involved in this issue.

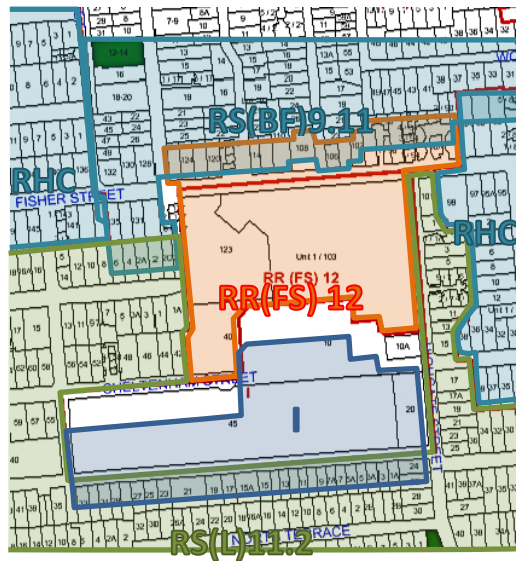
2.9.4	<b>Community Feedback</b>
	<p>A limited number of resident owners (≈2) have expressed concern the proposed Residential Streetscape Zone is an undue restriction on future division and re-development. Otherwise, there would generally appear to be wide support for the zone and maintenance of existing character.</p> <p>One submission incorrectly assumed sites along Nelson Street were not in the Residential Zone. In the Residential Zone the existing opportunity for division and small dwelling development (eg corner cut-offs) remains and satisfies this concern.</p> <p>There were no submissions regarding the Residential Zone application to Aragon Street but there was contact from a few owners that established the sites along the northern side were of appropriate frontage (greater than 15m), but shallower depth and area (eg 460m<sup>2</sup>) than those to the south (eg 580m<sup>2</sup>) whereby there would be notable variation from indicated site area for division (eg 230m<sup>2</sup> versus 300m<sup>2</sup>). However, the nature of existing zoning, development in the street, suitable street frontage width and reasonable expected outcome for development would likely support division for 2 semi-detached dwellings. Specific recognition of this expected outcome would be beneficial to support consistent and orderly development.</p>
2.9.5	<b>Council Review and Options</b>
	<p>The application of the Residential Streetscape Zone and Residential Zone is generally supported. The nature of the proposed Residential Zone is considered an appropriate balance of the strategic location adjacent to bus stations, existing long-term zoning and development and opportunity of modest potential for in-fill development. This supports the existing detached dwelling and limited mixed character while providing the opportunity if the market or owners choose modest redevelopment. The Residential Zone represents a constrained transition of change.</p> <p>Revision of the parameters for the precinct is not warranted but recognition of the expected and appropriate opportunity for division for semi-detached dwellings in Aragon Street is reasonable. Accordingly, a reference could be added to the Residential Zone to specify for Aragon Street that where street frontage criteria are still satisfied a reduced site area may still be appropriate. The changes pose no implications on development potential for the area.</p>
2.9.6	<b>Recommended Changes</b>
	Development Strategy and Policy Committee
	<p>Revise the proposed Residential Zoning to recognise in Aragon Street Fullarton that where the site depth is shallower in some case but the street frontage criteria is still satisfied, a reduced site area may be appropriate to facilitate expected semi-detached development.</p>

<b>2.10</b>	<b>Fullarton (Fisher Street Policy Area)</b>
	<p>The Residential Regeneration Zone (Fisher Street Policy Area 12) reflects the existing institutional and residential precinct and high scale built form in an open landscape setting. There is high integrity of neighbourhood character areas surrounding the policy area.</p>
2.10.1	DPA Proposals
	<p>The subject area in Fisher Street is currently covered by:</p> <ul style="list-style-type: none"> <li>▪ Residential B400 that provides for development up to 2 storey with minimum site area of 400m<sup>2</sup> per dwelling (and for example a street frontage of 9.0m per semi-detached dwelling and 12.5m per detached dwelling and 22m overall for multiple unit group dwellings or residential flat building)</li> <li>▪ Residential Historic Conservation Zones (Malvern Trimmer Estate and Fullarton Roseberry Estate) that provides for development up to 2 storey (within roof or to the rear) with minimum site area of 750 to 900m<sup>2</sup> per dwelling (and for example a street frontage of 15 to 18m per dwelling)</li> <li>▪ Institutional Zone that provides for a range of educational, health, community or institutional uses and residential development compatible with surrounding zones</li> </ul> <p>The subject area in Fisher Street is proposed to be covered by:</p> <ul style="list-style-type: none"> <li>▪ Residential Streetscape (Built Form) Zone (Fullarton 9.11) that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 700m<sup>2</sup> per dwelling (and for example a street frontage of 16.0m per dwelling)</li> <li>▪ Residential Streetscape (Landscape) Zone (Highgate 11.2) that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 700m<sup>2</sup> per dwelling (and for example a street frontage of 16.0m per dwelling)</li> <li>▪ Residential Historic Conservation Zones (Malvern Trimmer Estate and Fullarton Roseberry Estate) that provides for development up to 2 storey (within roof or to the rear) with minimum site area of 750 to 900m<sup>2</sup> per dwelling (and for example a street frontage of 15 to 18m per dwelling)</li> <li>▪ Institutional Zone that provides for a range of educational, health, community or institutional uses and residential development compatible with surrounding zones</li> <li>▪ Residential Regeneration Zone (Fisher Street Policy Area that provides for development up to 5 storey and minimum site area per dwelling of 180m<sup>2</sup> per row or group dwelling (150m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) and 120m<sup>2</sup> per dwelling (100m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) for Residential Flat Buildings (and for example a street frontage of 8m per dwelling and 20m overall for a residential flat building). Detached and Semi-detached dwellings are non-complying in the policy area.</li> </ul> <p>While heights up to 5 storey are envisaged in the Residential Regeneration Zone (Fisher Street Policy Area 12) the policy criteria includes a reduced site coverage and generous road setbacks parameters to provide for a landscaped setting and sensitive aspect to the Fisher Street frontage, reflecting the nature of existing and supported form of new development. Where the policy area adjoins a different zone (eg Streetscape) walls above 2 storey are required to be setback from side and rear boundaries additional distances to conform with a building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey and 19m for 4 storey (refer to Section 3.1), effectively limiting the height of building adjacent to the boundaries.</p>

	Existing Zoning	Proposed Zoning
2.10.2	Department of Planning Transport and Infrastructure	
	<p>The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured.</p> <p>Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone where suitable.</p> <p>The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>	
2.10.3	Other Agency Feedback	
	No other agencies are involved in this issue.	
2.10.4	Community Feedback	
	<p>A number of the residents/owners (~9) opposite the Policy Area to the north along Fisher Street have expressed concern the proposed Residential Regeneration Zone (Fisher Street Policy Area) with development up to 5 storey is not appropriate as evidenced by existing and approved developments undue impacts upon the area and houses opposite.</p> <p>It has been suggested by the group of residents that the policy area include the area opposite to reflect the imposition created and allow compensation to perceived lost amenity and value by increased potential development opportunity. It is recognised a lower height would be appropriate to maintain the amenity of properties to the rear of these houses.</p>	
2.10.5	Council Review and Options	
	<p>The proposed Residential Regeneration Zone (Fisher Street Policy Area 12) reflects existing and recently approved development and is considered suitable and an appropriate opportunity to incorporate increased density. While not on a main road corridor it still provides reasonable access to public transport, services and reflects the existing long-term nature of development.</p> <p>The suggested change by some to include a strip of houses to the north of the Fisher Street policy Area is not considered warranted as the wide roadway and landscaped setting provide reasonable visual separation, traffic capacity to maintain amenity and an orderly demarcation between the different zones. The Policy Area also identifies larger road setbacks and transitional building heights to respect surrounding character zones.</p>	

The further expansion of the Residential Regeneration Zone to the opposite side of a wide separating road is not considered appropriate and would create increased tension with the adjoining Streetscape Zone.

Option 1

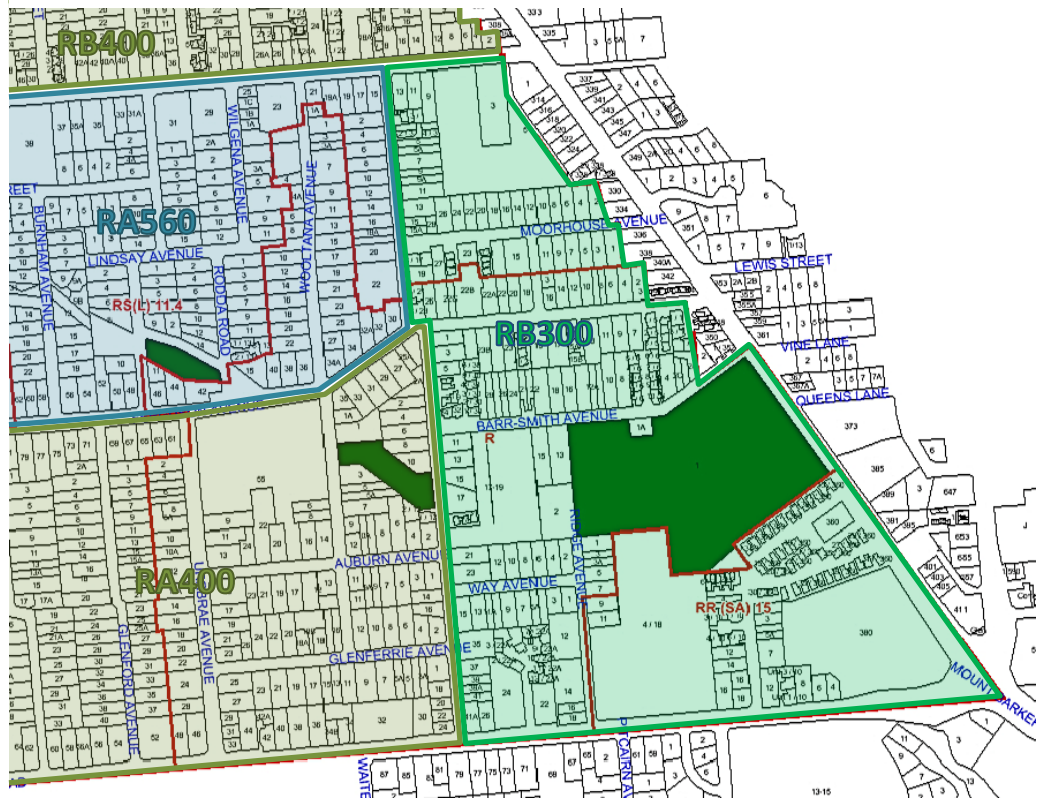


This option introduces a policy change not currently included in the proposed changes and could only be contemplated if there were re-consultation on the DPA.

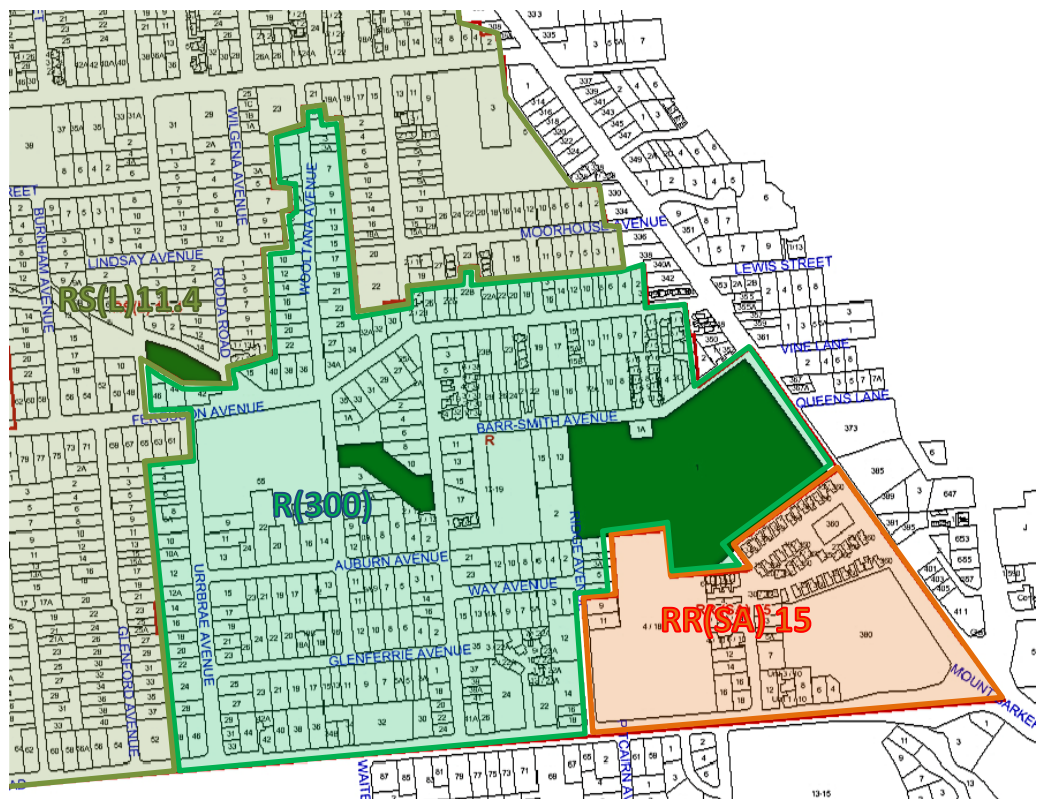
<b>2.10.6</b>	<b>Recommended Changes</b>
	Development Strategy and Policy Committee
	Maintain the current Residential Regeneration Zone (Fisher Street Policy Area 12) boundary and not expand to include the north side of Fisher Street.

<b>2.11</b>	<b>Myrtle Bank</b>
<p>In Myrtle Bank a range of different zones have been applied to respective areas to reflect the strategic location opportunities, existing long-term zoning and development, quantitative and qualitative character context and opportunity for continued modest potential for in-fill development and for a higher density precinct.</p> <p>Limited feedback has raised specific issues with the development potential and implications on character and traffic in some locations.</p>	
2.11.1	DPA Proposals
<p>The subject area in Myrtle bank is currently covered by:</p> <ul style="list-style-type: none"> <li>▪ Residential A560 Zone that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 560m<sup>2</sup> per dwelling (and for example a street frontage of 15.0m per dwelling and 30m overall for multiple unit group dwellings or residential flat building)</li> <li>▪ Residential A400 Zone that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 400m<sup>2</sup> per dwelling (and for example a street frontage of 11.0m per semi-detached dwelling and 12.5m per detached dwelling and 25m overall for multiple unit group dwellings or residential flat building)</li> <li>▪ Residential B300 Zone that provides for development up to 2 storey with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 7.5m per semi-detached dwelling and 9.0m per detached dwelling and 22m overall for multiple unit group dwellings or residential flat building)</li> </ul> <p>The subject area in Myrtle bank is proposed to be covered by:</p> <ul style="list-style-type: none"> <li>▪ Residential Streetscape (Landscape) Zone that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 800m<sup>2</sup> per dwelling (and for example a street frontage of 17.0m per dwelling)</li> <li>▪ Residential Zone that provides for development up to 2 storey (in the roof or to the rear) with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 8.0m per semi-detached dwelling, 10.0m per detached dwelling and 15m and 22m overall for multiple unit group dwellings or residential flat building)</li> <li>▪ Residential Regeneration Zone (Spence Avenue Policy Area) that provides for development up to 2 to 5 storey with a range of heights up to 5 storey and minimum site area per dwelling of 180m<sup>2</sup> per separate dwelling (150m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) and 120m<sup>2</sup> per dwelling (100m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) for residential flat buildings (and for example a street frontage of 20m overall for a residential flat building) in accord with a specific Concept Plan. Semi-detached and detached dwellings are non-complying in the Policy Area.</li> </ul> <p>The DPA proposed a change to a <i>SAPPL</i> Residential Zone in the central area to reflect the nature of development and provide a reasonable balance of the reasonable proximity to adjacent transit bus corridors, existing long-term zoning and development, quantitative and qualitative character context and opportunity of modest potential for in-fill development. This supports the existing detached dwelling and limited mixed character while providing the opportunity if the market or owners choose for modest redevelopment. The Residential Zone represents a constrained transition of change.</p> <p>The DPA proposed a change to a <i>SAPPL</i> Residential Regeneration Zone in the south eastern corner to reflect the dense nature of existing development, predominant single ownership and significant opportunity to optimise density and diversity of housing on large aggregated sites adjacent to transit bus corridors and commercial development along Glen Osmond Road.</p>	

Existing Zoning



Proposed Zoning



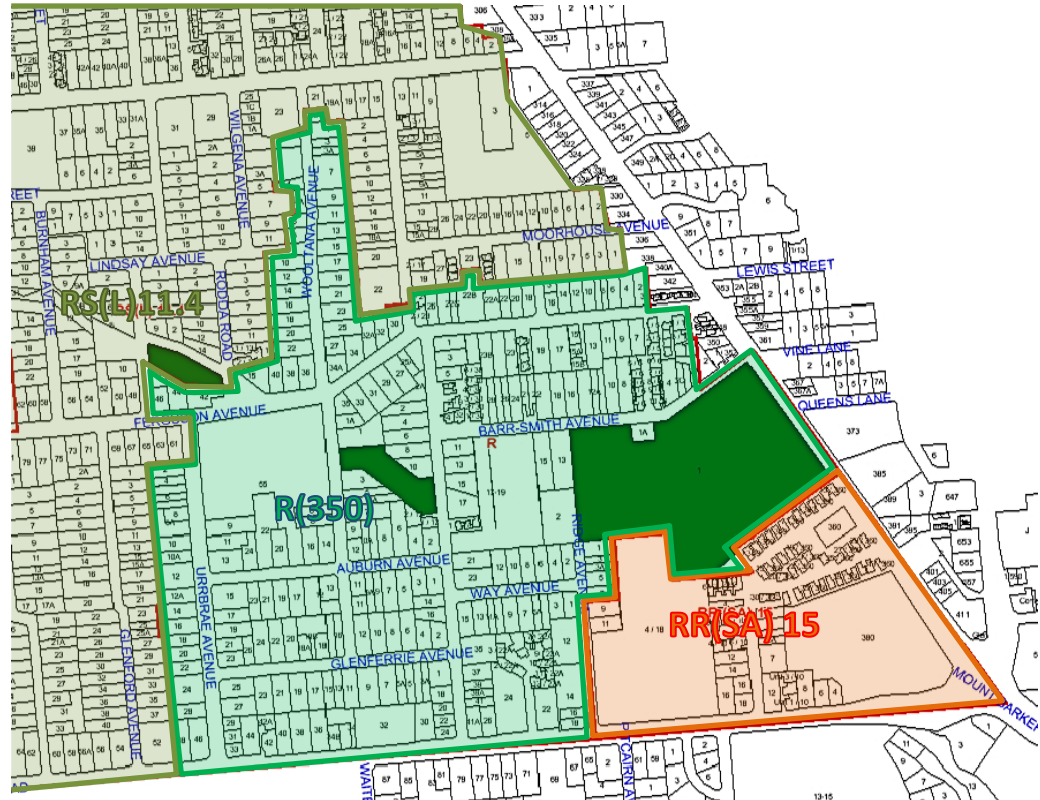
Open space areas are not separately zoned but are designated as community land, and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given the shortage of such space, to change the designation, which would be subject to widespread public consultation and further review by the State Government.

2.11.2	Department of Planning Transport and Infrastructure
	<p>The limitation of the Streetscape Zones, wider application of the Residential Zone and optimisation of the Residential Regeneration Zone is favoured.</p> <p>Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone.</p> <p>Current Streetscape Zone areas require reaffirmation, but Residential Zone and Residential Regeneration Zone areas are favoured. The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.11.3	Other Agency Feedback
	No other agencies are involved in this issue.
2.11.4	Community Feedback
	<p>A limited number of resident owners (<math>\approx 20</math>) have provided submissions within the subject area.</p> <p>A few have expressed concern the proposed Residential Streetscape Zone is an undue restriction on future division and re-development but more generally there would appear to be widespread support for the zone and maintenance of existing character.</p> <p>Varied responses have been expressed about the Residential Zone from support for reflection of existing development and future reasonable opportunity for development to concerns about facilitation of undesirable change.</p> <p>A small number have expressed concern about the change to opportunity for re-development in Wooltana Avenue generally (loss of back yards, increased density and traffic) and more specifically that 300m<sup>2</sup> presents potential for significant change to multiple dwellings given larger size of sites (median size around 900m<sup>2</sup>). Some acceptance of more limited and compatible 2 for 1 semi-detached or detached dwelling development and a larger minimum site area per dwelling that would encourage this.</p> <p>A small number of submissions from properties adjoining the Residential Regeneration Zone have expressed concern about the intensity of development in the precinct, potential impacts from scale of building adjoining neighbouring dwellings and strong desired to avoid traffic movements, or any increase, via the local road network and specifically Ridge Avenue (Refer to 2.12 and more specific discussion about this individual precinct).</p> <p>RSL Care as a large institutional site have sought greater recognition in the policy for the Residential Zone of the existing facilities and their appropriate re-development (Refer to 2.13 and more specific discussion in relation to this issue).</p>
2.11.5	Council Review and Options
	<p>The application of the Residential Streetscape Zone, Residential Zone and Residential Regeneration Zone (Spence Avenue Policy Area) appear generally supported with a limited number of adverse views and issues.</p> <p>The nature of the proposed zones is considered an appropriate balance reflecting existing long-term zoning, maintenance of higher integrity character areas and reasonable opportunity for development, more widely of modest in-fill nature and the specific precinct for higher density.</p> <p>The opportunity and potential for re-development of multiple dwellings given the larger size of sites in the Residential Zone, recognising the current mix of Residential B300, A400 and A560 Zones, generally lower density nature of the area and desire for more compatible semi-detached or detached dwellings,</p>

supports a review of the initially proposed minimum site area of 300m<sup>2</sup> to 350m<sup>2</sup>. The SAPPL zone promotes growth allows limited scope for minimum site areas to relate the provision to suit a given area.

The median site size is around 850m<sup>2</sup> in this area whereby the subtle change in development criteria is of negligible consequence to development potential. The major limitation to development of multiple dwellings is often the site frontage further limiting the consequence of the subtle change to site size.

Option 1



Option	Zone	Area (Hectare)	Existing Dwellings	Gross Density	Potential Outcome	Potential Growth	Likely Growth
Existing	RA560	35.5	320	11	390	70	
	RA400	30.5	260	15	450	190	
	RB300	29.8	300	22	650	350	150
Proposed	RS(L)	50.8*	460*	8	460*	0	
	R(300)	34.5	330	22	760	430	
	RR SA	10.5	90	50	520	430	210
Option 1	RS(L)	50.8*	460*	8	460*	0	
	R(350)	34.5	330	19	650	320	
	RR SA	10.5	90	50	520	430	190

Numbers are rounded for existing dwelling for simplicity and for growth numbers as they are estimates primarily derived to provide a comparison

\* part of area included simply for comparison

Gross density is dwellings per hectare calculated by typical factor of 2/3 of net density based on zone minimum site areas

The likely growth to 2040 is based on DPTI methodology of 25% of potential

The change to the Residential Zone (from minimum site area of 300m<sup>2</sup> to 350m<sup>2</sup>) poses limited implications on development potential for the Residential Zone and in the context of the overall yield (potential growth to 2040 of 80 versus 105 dwellings).

The provision for very large sites greater than 5,000m<sup>2</sup> to potentially encompass a centralised third storey was intended to recognise existing supported accommodation facilities (eg aged persons accommodation) where there may be a need for sensitive re-development flexibility where the site size would mitigate external visibility of greater scale. No increase in dwelling density is suggested and the extra holding costs to amalgamate current smaller land parcels and higher construction costs of three storey suggest it is unlikely such new development would generally be viable or therefore widespread. In any event the details of the provision requires review to clarify its intent (refer to Section 2.13).

<b>2.11.6 Recommended Changes</b>
Development Strategy and Policy Committee
Revise the proposed Residential Zone in Myrtle Bank in accord with Option 1 (with revised minimum site area of 350m <sup>2</sup> ).

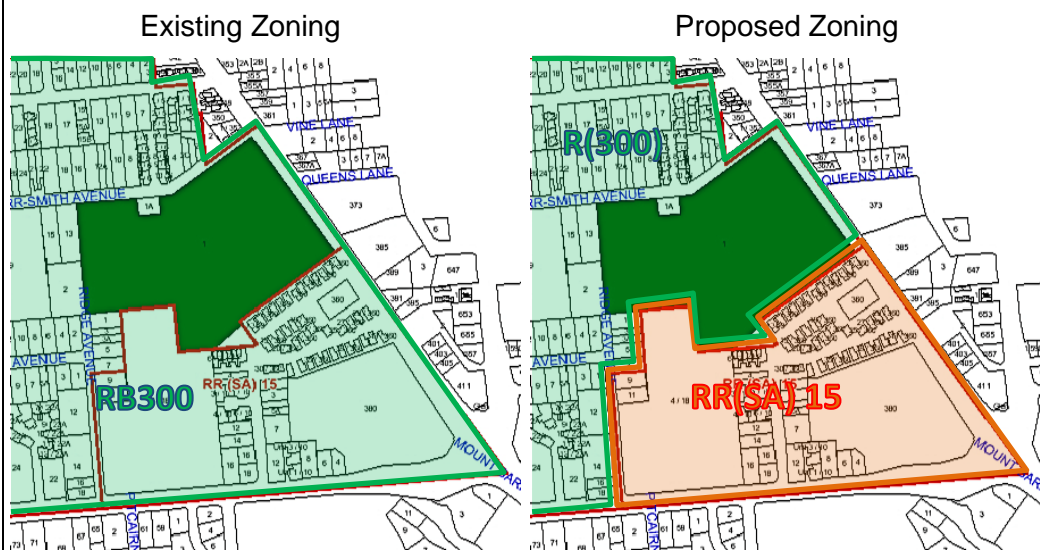
**2.12 Myrtle Bank (Spence Avenue Policy Area and Concept Plan)**

The Residential Regeneration Zone (Spence Avenue Policy Area 15) adjacent to the south east corner of the city and Cross Road and Glen Osmond Road has been questioned in regard to implications of the focus on intensive development, associated amenity, increase in traffic on the local road network and impacts upon adjoining Residential Zone and lower scale of development.

**2.12.1 DPA Proposals**

The subject Spence Avenue Policy Area in Myrtle Bank is currently covered by a Residential B300 Zone that provides for development up to 2 storey with minimum site area of 300m<sup>2</sup> per dwelling (and for example a street frontage of 7.5m per semi-detached dwelling, 9.0m per detached dwelling and 22m for multiple dwellings group dwellings or a residential flat building).

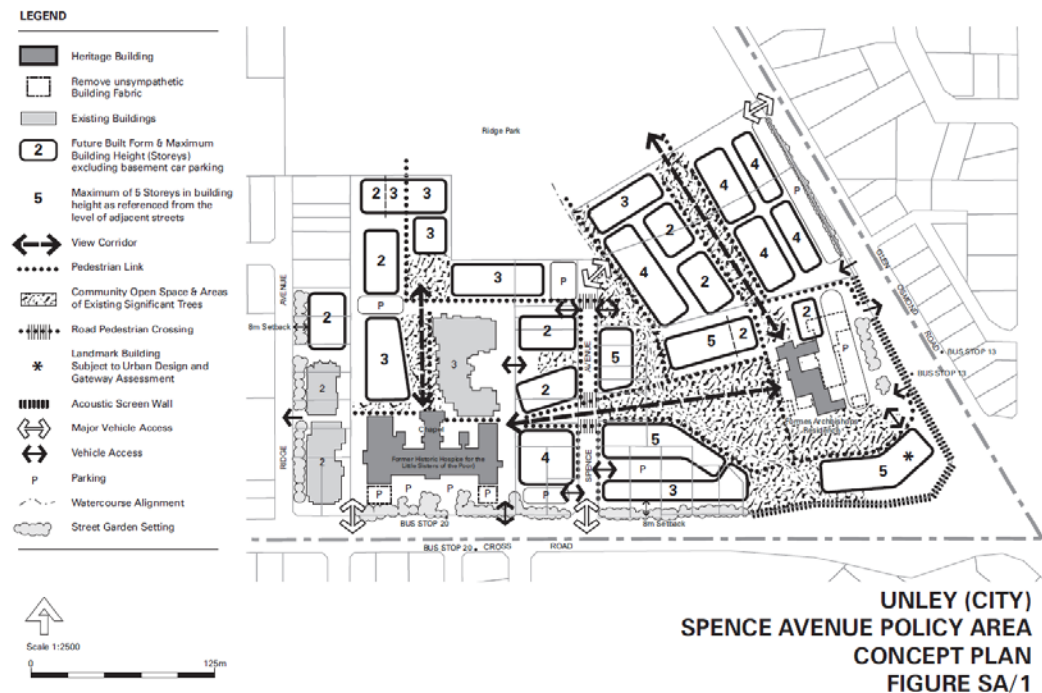
The DPA proposed a change to a *SAPPL* Residential Regeneration Zone (Spence Avenue Policy Area) that provides for development with a range of heights up to 5 storey and minimum site area per dwelling of 180m<sup>2</sup> per separate dwelling (150m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) and 120m<sup>2</sup> per dwelling (100m<sup>2</sup> on large sites greater than 2,000m<sup>2</sup>) for residential flat buildings (and for example a street frontage of 20m overall for a residential flat building). Semi-detached and detached dwellings are non-complying in the Policy Area. In addition the layout and key building elements are outlined in a specific Concept Plan.



Open space areas are not separately zoned but are designated as community land, and other than associated recreational facilities and buildings, cannot be developed or sold as a consequence. There is no intent or justification, given the shortage of such space, to change the designation. Any changes to designation are subject to widespread public consultation and review by the State Government.

The Concept Plan outlines a range of heights for building areas from 2 storey up to 5 storey in the Residential Regeneration Zone (Spence Avenue Policy Area 15) in a conscious layout to limit height adjacent to the perimeter of the policy area and lower scale development, concentrate greater building scale in appropriate locations and maintain generous open spaces and identify main internal movement linkages and access to adjoining roads. A comprehensive long-term intensive development opportunity is warranted for the area given large land holdings and largely common ownership.

Proposed Concept Plan Figure SA/1



**2.12.2 Department of Planning Transport and Infrastructure**

Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and focusses the application of the Residential Zone and Residential Regeneration Zone.

The Spence Avenue Policy Area provides an opportunity to optimise development potential in a suitable precinct and is a favoured approach.

The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.

**2.12.3 Other Agency Feedback**

The Transport Services Division of DPTI have commented that while supporting the intent of the Concept Plan there needs to be amendment to recognise:

- road widening requirements to support the long term upgrade of the Glen Osmond Road / Cross Road / Portrush Road intersection
- continued direct arterial road access cannot be guaranteed and individual property access should not be shown on the Concept Plan and the focus for access should emphasise a focus on Spence Avenue. Further, it is recommended the local road network be reviewed, including the possibility of linking Ridge Avenue with Spence Avenue, to provide future development with access via local roads and internal roadways in lieu of individual property accesses.

**2.12.4 Community Feedback**

A number of residents/owners reviewed the proposals for the area but only a few (≈4) submissions were received from Ridge Avenue in relation to the subject area.

The principle concerns are in regard to the implications of the intensive nature of development in the precinct, potential loss of views and its ultimate amenity, direct impacts from larger buildings adjacent to adjoining lower scale dwelling sites and that traffic access should be denied or very limited to avoid any significant increases in traffic in the adjacent streets and local road network.

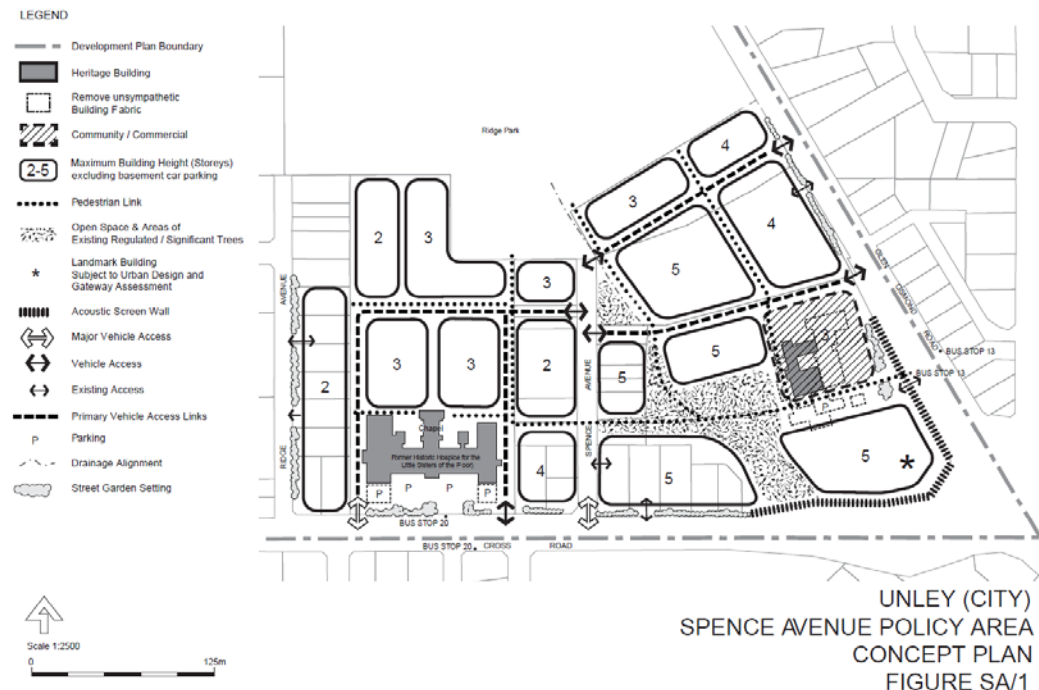
The primary land holder in the policy area (Southern Cross) have indicated fundamental support for the zoning and proposals but have suggested amendments to details of the zone policy and Concept Plan to simplify building outlines and heights to reflect areas rather than specific building footprints, reduce level of confusing non-essential detail, revise configuration and setting for heritage building (reduce to 1896 configuration and remove 1935 and later additions), provide greater recognition for associated non-residential activities adjacent to Glen Osmond Road for the heritage precinct, maintain flexibility for gateway building scale and clarify vehicle access locations to external roads and the network of internal movement connections.

2.12.5 Council Review and Options

The proposed Residential Regeneration Zone – Spence Avenue Policy Area reflects the current nature of development and opportunity to optimise and plan a suitable future higher density precinct.

The ‘*Overlay - Noise and Air Emissions*’ policies are appropriately applied in this location and for the nature of development to mitigate possible adverse living implications. Associated commercial development is to be limited and orientated to Glen Osmond Road to complement the planning and facilities for the precinct.

The suggested revised Concept Plan provides an appropriate outline and level of detail to support suitable comprehensive redevelopment, provision of services and access for the policy area but needs further refinement of details regarding road widening requirements and access provisions.



Road widening and building clearance is being resolved by DPTI with the owner, but it appears the necessary requirements can be accommodated. Similarly the final requirements and rationalisation of vehicle access, particularly adjacent to the Cross Road and Glen Osmond Road intersection, are being satisfactorily finalised.

The existing, and a limited, vehicle access for portion of the development to Ridge Avenue is reasonable. The nature of the access needs refinement and supporting guiding policy to reflect the desired limitations. DPTI seem to accept this limitation and the outlined rationalised arterial road access with strong internal links.

The revised extent of the State Heritage Place in accord with the form of the 1896 building, and removal of the 1935 and later additions, is supported by independent heritage advice and appears to be a reasonable outcome. As a State Heritage Place this is subject to Heritage SA advice and their feedback will be required before finalising the represented outcome in the Concept Plan.

The nature of Glen Osmond Road, and the focus the heritage building provides, supports this area being suitable location for the necessary associated and supporting care services and commercial facilities for the aged care complex. The resolution of final building scale and relationship with the heritage building would be addressed as part of detailed design and applicable heritage policy provisions.

The building heights at the gateway location are measured from the adjacent road level. This limits the overall visible height but with the fall of the land internally offers additional levels for accommodation below road level.

The building height adjacent to adjoining properties, eg Ridge Avenue, is limited to 2 storey above relative ground level, and the typical setbacks would be applicable (ie for side boundary 1m for 1 storey up to 4m and 2m for 2 storey up to 7m and for rear boundary 3m for 1 storey and 6m for 2 storey).

Scale of development and buildings likely to be larger than dwellings and therefore it would be appropriate to clarify larger building mass should be articulated by varied and increased setbacks and elevations to mitigate overbearing scale, bulk, blandness and/or visual intrusion to neighbours. This policy is applicable to Policy Area and more generally in Council-wide policy for building appearance and setbacks.

In addition, while heights up to 5 storey are envisaged in some locations the policy criteria provides where the policy area adjoins a different zone (eg Residential) walls above 2 storey (7 metres) are required to be setback from side and rear boundaries additional distances to conform with a building envelope of 30 degrees from 3m above ground level, ie 13m for 3 storey and 19m for 4 storey (refer to Section 3.1).

## 2.12.6 Recommended Changes

Development Strategy and Policy Committee

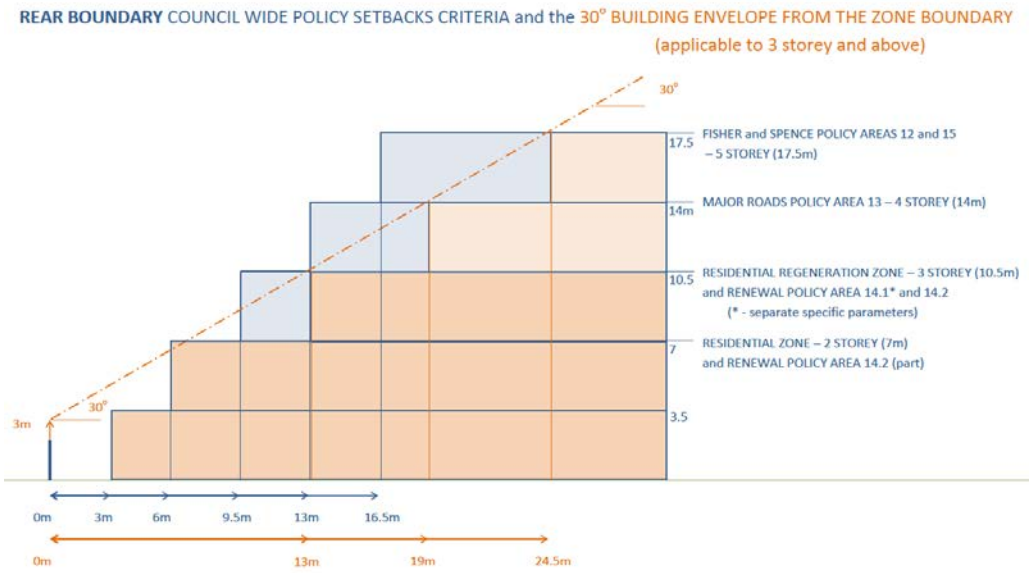
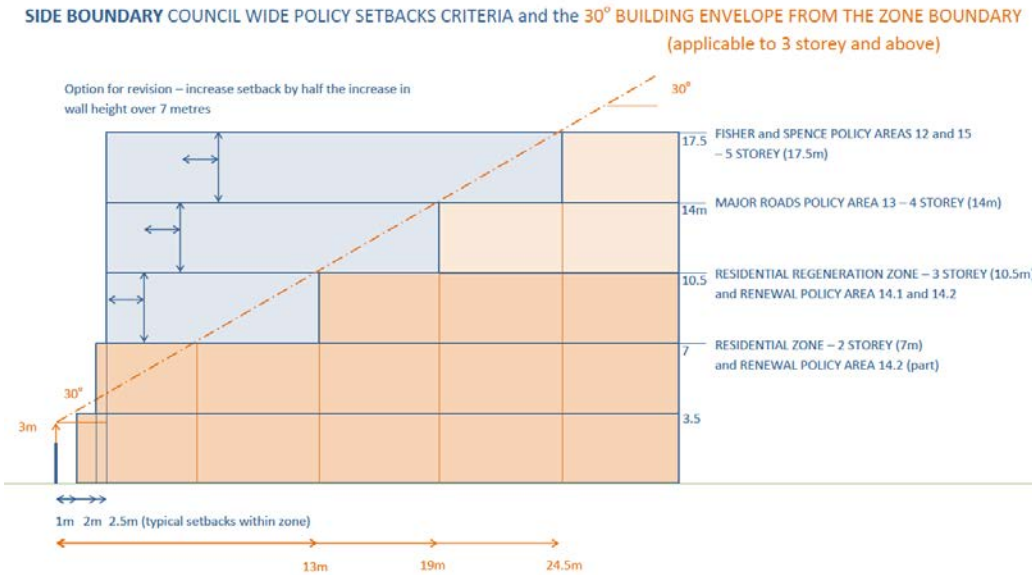
Revise the proposed Residential Regeneration Zone (Spence Avenue Policy Area 15) reflecting the suggested an amended Concept Plan Figure SA/1, including simplified building areas and heights outlines, support for community and associated commercial activities in activity hub orientated to Glen Osmond Road, suitable restored heritage building (in accord with Heritage SA advice), road widening and rationalised vehicle access (avoiding or limiting distribution to Ridge Avenue) in accord with DPTI (Transport Services) negotiations, and additional policy for articulation of larger buildings to avoid bulk and visual impacts to neighbours.

<b>2.13</b>	<b>Recognition of Existing Large Supported Accommodation Facilities</b>
	<p>The Residential Zone included a provision that for very large sites (greater than 5,000m<sup>2</sup>) a centralised additional 3<sup>rd</sup> storey may be added if it exhibited no more than a predominately 2 storey visual aspect to surrounding sites and roadways.</p> <p>The issue of recognition and sensitive intensified re-development of very large existing supported accommodation facilities (eg aged care) has been identified more generally and in specific examples in the Residential Streetscape Zones as well as the Residential Zone.</p> <p>The provision is warranted but requires revision to provide more specific recognition of existing very large institution care facilities optimised re-development across the Residential and Streetscape Zones.</p>
2.13.1	DPA Proposals
	<p>The Residential Zone included a provision that for very large sites (greater than 5,000m<sup>2</sup>) a centralised additional 3<sup>rd</sup> storey may be added if it exhibited no more than a predominately 2 storey visual aspect to surrounding sites and roadways.</p> <p>This was primarily intended to recognise and address existing large supported accommodation facilitates appropriate optimised re-development. It has been more widely interpreted and could potentially facilitate amalgamated sites to achieve the greater height, although no corresponding increase in dwelling density is provided for by the Residential Zone provisions.</p>
2.13.2	Department of Planning Transport and Infrastructure
	<p>Council's strategy and zone structure supports recognition of the widespread areas of higher character integrity and limits the application of the Residential Zone and Residential Regeneration Zone, with a focus towards main roads.</p> <p>The limit to increased density within the Residential and Streetscape Zones and their wide application across the city is not favoured. Enhanced flexibility for sensitive re-development, and particularly development to increase aged care accommodation, would be encouraged.</p> <p>The DPTI, and ultimately the Minister for Planning, have the responsibility for deciding support and approval of any zone changes.</p>
2.13.3	Other Agency Feedback
	<p>Renewal SA (and through DPTI) have promoted <i>SAPPL</i> policy that requires facilitation of affordable housing in larger multi-unit schemes that can offer a range of dwelling types and prices.</p> <p>Housing SA generally supports the opportunities for increased density, and in particular the Residential Regeneration Zone where a number of their sites are well positioned for more intensive re-development in the longer term.</p> <p>The notion of opportunities to increase the availability of supported accommodation and aged care facilities is equally applicable.</p>
2.13.4	Community Feedback
	<p>A number of residents/owners in their submissions on the Residential Zone have commented on the concern about development up to 3 storey in height, albeit it is limited to only very large sites.</p> <p>A number of aged care providers made submissions regarding the general need to facilitate aged care accommodation across the city and in relation to specific properties the need to facilitate appropriate intensive re-development of accommodation density and increased building height (3 storey and even potentially 4 storey an specific sites), to optimise outcomes for the extent and quality of aged care accommodation. Other than the Residential Regeneration Zone, the Residential Zone and particularly Residential Streetscape Zone do</p>

	not recognise these needs adequately, or the aims of The 30-Year Plan for Greater Adelaide or the Unley Strategy, to provide flexibility to optimise intensive but sensitive re-development of existing large facilities.
2.13.5	<p><b>Council Review and Options</b></p> <p>The allowance in the Residential Zone for development up to 3 storey in height, on very large sites, was aimed at existing large supported accommodation facilities. There is the possibility additional large sites could be aggregated over time to lead to such development opportunity. While added height may be possible, the dwelling density is not increased. Added construction costs for 3 storey, no dwelling gain and significant land holding costs over time to achieve aggregation suggest such new development is generally unlikely.</p> <p>The general need for a diversity of housing, including aged care accommodation, across the city is recognised. The changing nature of aged care accommodation and necessary increase in capacity is also recognised. Existing historical development provides a high diversity of alternative housing (Unley 41% vs ASD 24%) and is disbursed across the city. This provides ongoing options and opportunities for sensitive re-development, notwithstanding zone provisions while being respectful of a balanced sensitive outcome.</p> <p>The residential areas directly allowing growth may be limited but are well distributed and offer a fine-grained network close to all areas by virtue of location on the main road corridors and other diverse areas of the Residential and Residential Regeneration Zones. This provides opportunities for a diversity of alternative types and higher density of housing, including aged accommodation.</p> <p>The Residential Zone, and particularly Residential Streetscape Zone, do not adequately recognise the existing large supported accommodation facilities that may exist where there is a need to facilitate appropriate intensive yet sensitive re-development to optimise outcomes for the future extent and quality of aged care accommodation.</p> <p>It is conceded there needs to be a range of minor amendments to the zone provisions that maintain the overall intent but in particular recognise existing large institutional and aged care facilities and provide appropriate flexibility to optimise their intensive but sensitive re-development.</p> <p>The zone policy needs to be revised in regard to:</p> <ul style="list-style-type: none"> <li>▪ including updated development terminology to reflect contemporary forms of aged care development and <i>SAPPL</i> accepted terminology</li> <li>▪ Update public notification provisions in accord with updated terminology</li> <li>▪ Recognise existing large institutional aged care sites, their atypical form and appropriateness for sensitive but intensive re-development</li> <li>▪ Incorporate policy flexibility for more intensive density and height of built form, while limiting external visible scale and respecting desired character</li> <li>▪ Afford flexibility for associated community, health, aged and commercial services on aged care sites, primarily but not exclusively for residents</li> </ul>
2.13.6	<p><b>Recommended Changes</b></p> <p>Development Strategy and Policy Committee</p> <p>Revise the proposed Residential and Streetscape Zones provisions to recognise existing large supported accommodation facilities (eg aged care) and their intensive but sensitive re-development to optimise the amount and quality of aged accommodation plus limited associated community, health, aged and commercial services.</p>

### 3.0 Council-wide Policy and Design Parameters

3.1 Building Envelope (Height and Setbacks)																													
	<p>The respective zones establish the height allowance for development but the Council-wide policy provides general parameters for buildings setbacks, relative to those heights.</p> <p>In addition to specific setbacks for development within zones, a nominated building envelope is provided for the management of implications of heights above 2 storey at the interface with a different and lower density zone.</p> <p>Some concern was raised about these parameters.</p>																												
3.1.1	DPA Proposals																												
	<p>The proposed policy for setbacks relative to height is covered in the Council-wide section on <i>Residential Development</i> and is a <i>SAPPL</i> compliant revision of the existing policy. A building envelope provision has been added to address building setback transition at the interface with other zones.</p> <p>13 Except where specified in a relevant zone or policy area, dwelling setbacks from side and rear boundaries should be progressively increased as the height of the building increases to minimise massing and overshadowing impacts to adjoining properties and should be in accordance with the following parameters:</p> <table border="1"> <thead> <tr> <th>Wall height from natural ground level (metres)</th> <th>Site area (square metres)</th> <th>Minimum side boundary setback (metres)</th> <th>Minimum rear boundary setback (metres)</th> </tr> </thead> <tbody> <tr> <td>≤4</td> <td>≤300</td> <td>1</td> <td>3</td> </tr> <tr> <td></td> <td>&gt;300</td> <td>1</td> <td>5</td> </tr> <tr> <td>4.1 – 7</td> <td>≤300</td> <td>2</td> <td>6</td> </tr> <tr> <td></td> <td>&gt;300</td> <td>3</td> <td>8</td> </tr> <tr> <td>&gt;7</td> <td>≤300</td> <td>2.5</td> <td>6 (plus the equivalent increase in wall height over 7m)</td> </tr> <tr> <td></td> <td>&gt;300</td> <td>3.5</td> <td>8 (plus the equivalent increase in wall height over 7m)</td> </tr> </tbody> </table> <p>Note:</p> <p>(a) Minimum setback of 1.8 metres to a habitable room window of an adjacent dwelling</p> <p>(b) Buildings of 3 storeys or more should be constructed within a building envelope provided by a 30 degree plane, measured from a height of 3 metres above natural ground level at the zone boundary</p>	Wall height from natural ground level (metres)	Site area (square metres)	Minimum side boundary setback (metres)	Minimum rear boundary setback (metres)	≤4	≤300	1	3		>300	1	5	4.1 – 7	≤300	2	6		>300	3	8	>7	≤300	2.5	6 (plus the equivalent increase in wall height over 7m)		>300	3.5	8 (plus the equivalent increase in wall height over 7m)
Wall height from natural ground level (metres)	Site area (square metres)	Minimum side boundary setback (metres)	Minimum rear boundary setback (metres)																										
≤4	≤300	1	3																										
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	>300	3.5	8 (plus the equivalent increase in wall height over 7m)																										
3.1.2	Department of Planning Transport and Infrastructure																												
	<p>DPTI have not raised any issue with the proposed policy, but have commented on some technical matters for amendment, namely:</p> <ul style="list-style-type: none"> <li>▪ 4.1 – 7 should be &gt;4.0 - 7</li> <li>▪ Notes are not supported and part a) is addressed elsewhere but part b) could be included as a Principle of Development Control, including a figure previously included for the Urban Corridor Zone.</li> </ul>																												

3.1.3	<p><b>State Agency Feedback</b></p>
	<p>No other agencies are involved in this issue.</p>
3.1.4	<p><b>Community Feedback</b></p>
	<p>Concern was raised about the setbacks for given building heights, particularly for heights greater than 2 storey, and impacts at zone interfaces.</p> <p>Impacts from the density and scale of development were generally considered excessive and unacceptable with overbearing visual intrusion and over shading impacts to adjacent lower density existing development.</p>
3.1.5	<p><b>Council Review and Options</b></p>
	<p>The adopted rear building envelope angle of 30 degrees from 3m above ground level at zone interfaces is considered reasonable to mitigate building and visual intrusion relative to the adjoining site.</p> <p>Modelling of proposed building setbacks relative to height for 3 storey and above within zone areas (ie where 30 degree building envelope would not apply) highlighted an improvement could be made to maintain a relative increase in setback for an increase in height, ie a 1m increase in setback for every metre of wall height above 7m.</p> <p><b>REAR BOUNDARY COUNCIL WIDE POLICY SETBACKS CRITERIA and the 30° BUILDING ENVELOPE FROM THE ZONE BOUNDARY (applicable to 3 storey and above)</b></p>  <p><b>SIDE BOUNDARY COUNCIL WIDE POLICY SETBACKS CRITERIA and the 30° BUILDING ENVELOPE FROM THE ZONE BOUNDARY (applicable to 3 storey and above)</b></p> <p>Option for revision – increase setback by half the increase in wall height over 7 metres</p> 

The proposed provision could be revised to enhance the detail and clarity of the setback and envelope provisions.

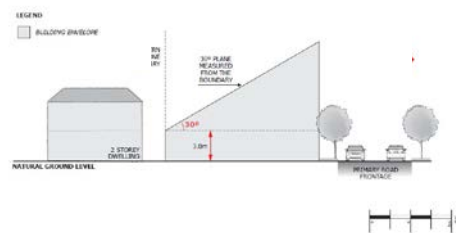
Option 1

- 13 Except where specified in a relevant zone or policy area, dwelling setbacks from side and rear boundaries should be:
- (a) progressively increased as the height of the building increases to minimise massing and overshadowing impacts to adjoining properties and should be in accordance with the following parameters:

Wall height from natural ground level (metres)	Site area (square metres)	Minimum side boundary setback (metres)	Minimum rear boundary setback (metres)
≤4	≤300	1	3
	>300	1	5
≥4 – 7	≤300	2	6
	>300	3	8
>7	≤300	2.5 <del>3</del> (plus half the equivalent increase in wall height over 7m)	6 (plus the equivalent increase in wall height over 7m)
	>300	3.5 <del>4</del> (plus half the equivalent increase in wall height over 7m)	8 (plus the equivalent increase in wall height over 7m)

Note:

- ~~(a) Minimum setback of 1.8 metres to a habitable room window of an adjacent dwelling~~
- (b) further contained for buildings of 3 storeys or more (or wall heights greater than 7 metres) should be constructed within a building envelope provided by a 30 degree plane, measured from a height of 3 metres above natural ground level of the adjoining affected land at the zone or policy area boundary with a different zone



All development is subject to the Council-wide overlooking and overshadowing policies to alleviate unreasonable impacts.

**3.1.6 Recommended Changes**

Development Strategy and Policy Committee

Revised the Council-wide dwelling setbacks provisions in accord with Option 1 (to include an increase in side setbacks equivalent to half of the increase in wall height above 7 metres and also clarification of the zone interface building envelope as a Principle of Development Control with inclusion of a diagram).

<b>3.2</b>	<b>Overlays (Emissions and Affordable Housing)</b>
	<p>The 30-Year Plan for Greater Adelaide Higher has a focus on opportunities for higher density residential development and living on main road corridors. The DPTI have addressed potential concerns of potential pollution and including affordable housing as part of its <i>SAPPL</i> template policy modules.</p> <p>The modules exist within the current Development Plan but are currently narrowly applied.</p>
3.2.1	DPA Proposals
	<p>The <i>SAPPL</i> Overlays for 'Affordable Housing' and 'Noise and Air Emissions' policy modules already exist within the Development Plan and are currently applied to the Urban Corridor Zone on Unley Road and Greenhill Road.</p> <p>The key policies for affordable housing are also included in the Council-wide Residential Development module (Principles of Development Control 54 and 55) to generally encourage affordable housing in residential developments comprising 20 dwellings or more.</p> <p>The overlay modules were not identified to be specifically added as part of the DPA proposals but in accord with agency advice this should be reviewed.</p> <p><b>Overlay – Affordable Housing</b></p> <p>Refer to Map Un/1 (Overlay 5) that relates to this overlay. The following policies apply to the 'designated area' marked on the relevant Overlay Map.</p> <p><b>INTERPRETATION</b></p> <p>Where the Objectives and/or Principles of Development Control that apply in relation to this overlay are in conflict with the relevant General Objectives and/or Principles of Development Control in the Development Plan, the overlay will prevail.</p> <p><b>OBJECTIVES</b></p> <p><b>Objective 1:</b> Affordable housing that is integrated into residential and mixed use development.</p> <p><b>Objective 2:</b> Development that comprises a range of affordable dwelling types that caters for a variety of household structures.</p> <p><b>PRINCIPLES OF DEVELOPMENT CONTROL</b></p> <p>1 Development comprising 20 or more dwellings should include a minimum of 15 percent affordable housing (as defined by the South Australian Housing Trust Regulations 2010 as amended).</p> <p><b>Overlay – Noise and Air Emissions</b></p> <p>Refer to Map Un/1 (Overlay 3) that relates to this overlay. The following policies apply to the 'designated area' marked on the relevant Overlay Map.</p> <p><b>INTERPRETATION</b></p> <p>Where the Objectives and/or Principles of Development Control that apply in relation to this overlay are in conflict with the relevant General Objectives and/or Principles of Development Control in the Development Plan, the overlay will prevail.</p> <p><b>OBJECTIVES</b></p> <p><b>Objective 1:</b> Protect community health and amenity from adverse impacts of noise and air emissions.</p> <p><b>PRINCIPLES OF DEVELOPMENT CONTROL</b></p> <p>1 Noise and air quality sensitive development located adjacent to high noise and/or air pollution sources should:</p> <ul style="list-style-type: none"> <li>(a) shield sensitive uses and areas through one or more of the following measures: <ul style="list-style-type: none"> <li>(i) placing buildings containing less sensitive uses between the emission source and sensitive land uses and areas;</li> <li>(ii) within individual buildings, place rooms more sensitive to air quality and noise</li> </ul> </li> </ul>

	<p>impacts (e.g. bedrooms) further away from the emission source;</p> <p>(iii) erecting noise attenuation barriers provided the requirements for safety, urban design and access can be met;</p> <p>(b) use building design elements such as varying building heights, widths, articulation, setbacks and shapes to increase wind turbulence and the dispersion of air pollutants provided wind impacts on pedestrian amenity are acceptable;</p> <p>(c) locate ground level private open space, communal open space and outdoor play areas within educational establishments (including childcare centres) away from the emission source.</p>
3.2.2	<p><b>Department of Planning Transport and Infrastructure</b></p> <p>DPTI have commented that consideration should be given to applying the 'Overlay - Noise and Air Emissions' to the Residential Regeneration Zone as it may be particularly relevant to the Major Roads Policy Area, Spence Avenue Policy Area and along Fullarton Road.</p>
3.2.3	<p><b>State Agency Feedback</b></p> <p>The Environment protection Authority (EPA) commented on the consideration of high density living in close proximity to main roads and appropriate management of potential impacts, noting:</p> <ul style="list-style-type: none"> <li>▪ policies relating to noise, air emissions, site contamination, natural resources and waste are already in Development Plan</li> <li>▪ the latest SAPPL policy module 'Interface Between Land Uses' that the EPA provided technical input on is already in Development Plan</li> <li>▪ the latest SAPPL EPA endorsed policy module 'Overlay - Noise and Air Emissions' is already in the Development Plan and applied to the Urban Corridor Zone (Greenhill and Unley Roads). The Residential Regeneration Zone aims to facilitate medium to high dwelling densities, particularly on or near main roads with higher traffic volumes and speed, eg Major Roads Policy Area 13 on Anzac Highway and South Road. Anzac Highway is identified as a Type A Road, similar to Greenhill Road, and therefore the overlay should be applied. Further investigation may be warranted in accord with the Minister's Specification (SA 78B) for construction requirements for the control of external sound and where the overlay may be applicable and the type of corridors</li> </ul> <p>Renewal SA support the policy changes directed at achieving The 30-Year Plan for Greater Adelaide but commented:</p> <ul style="list-style-type: none"> <li>▪ Non-discretionary affordable housing Objectives 4 and 6 of the SAPPL module have been omitted from the Residential Regeneration Zone and Residential Zone respectively. Including them may help facilitate goals for achieving more affordable housing in these zones</li> <li>▪ Adoption of the Residential Regeneration Zone is important to promote regeneration of medium density housing, including affordable housing. SAPPL Principles of Development Control (PDC) 12, 13 and 14 have been omitted and should be considered for inclusion, particularly PDC 14 providing 'incentives' (eg reduced site areas) to promote affordable housing.</li> </ul> <p><b>Residential Regeneration Zone – SAPPL module</b></p> <p><b>OBJECTIVES</b></p> <p>...</p> <p>4 Increased mix in the range of dwellings, including a minimum of 15 per cent affordable housing, available to cater for changing demographics, particularly smaller household sizes and supported accommodation.</p>

	<p>...</p> <p>6 Increased dwelling densities and population.</p> <p>Affordable Housing</p> <p>...</p> <p>12 Development should include a minimum 15 per cent of residential dwellings for affordable housing.</p> <p>13 Affordable housing should be distributed throughout the zone / X policy area X to avoid overconcentration of similar types of housing in a particular area.</p> <p>14 <i>(Optional – only remove this PDC if justification is provided in the Statement of Investigations)</i> Dwellings constituting affordable housing should be designed within the following parameters and have a minimum site area (and in the case of residential flat buildings, an average site area per dwelling) not less than that shown in the following table: <i>(Conversion note: the parameters in the following table must be 'lower' than those required generally in the zone)</i></p> <table border="1" data-bbox="416 734 1402 1279"> <thead> <tr> <th rowspan="2">Parameter</th> <th colspan="5">Dwelling type</th> </tr> <tr> <th>Detached</th> <th>Semi-detached</th> <th>Group</th> <th>Residential flat building</th> <th>Row</th> </tr> </thead> <tbody> <tr> <td>Site area (square metres)</td> <td>X minimum</td> <td>X minimum</td> <td>X minimum</td> <td>X average</td> <td>X minimum</td> </tr> <tr> <td>Minimum area of private open space for ground level dwellings (square metres)</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Minimum area of private open space in the form of a balcony for dwellings above ground level (square metres)</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Minimum number of on site car parking spaces (one of which should be covered <i>(Conversion Note: the words '(one of which should be covered)' are optional text)</i>)</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> </tbody> </table> <p>...</p> <p>DPTI have advised the policy for Affordable Housing while applied through the overlay for Unley and Greenhill Roads would more appropriately be applied within the residential zones as suggested by Renewal SA and the SAPPL Affordable Housing Overlay Technical Sheet 06.</p>	Parameter	Dwelling type					Detached	Semi-detached	Group	Residential flat building	Row	Site area (square metres)	X minimum	X minimum	X minimum	X average	X minimum	Minimum area of private open space for ground level dwellings (square metres)	X	X	X	X	X	Minimum area of private open space in the form of a balcony for dwellings above ground level (square metres)	X	X	X	X	X	Minimum number of on site car parking spaces (one of which should be covered <i>(Conversion Note: the words '(one of which should be covered)' are optional text)</i> )	X	X	X	X	X
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3.2.4	Community Feedback																																			
	<p>There have been various resident comments regarding concerns about the nature and tenure of envisaged accommodation in the higher density areas, particularly the Residential Regeneration Zone, leading to undesirable outcomes for the amenity of these areas.</p>																																			
3.2.5	Council Review and Options																																			
	<p>The policy modules were not identified to be specifically applied as part of the DPA proposals as general policy covers residential areas. In accord with agency advice this should be reviewed and their application broadened to the main road corridor and higher density residential zones, particularly the Residential Regeneration Zone.</p> <p>The proposed general City-wide policy for the design of development provides adequate regard for the reasonable amenity of adjacent existing development and design within new development.</p>																																			

	<p>Option 1</p> <p>The <i>'Overlay - Noise and Air Emissions'</i> be applied to the Residential Regeneration Zone Main Roads Policy Area 13, Spence Avenue Policy Area 15 and along Fullarton Road. Pursuant to the DPTI Technical Information Sheet 08 the types of roads for the overlay area are defined as follows:</p> <ul style="list-style-type: none"> <li>▪ Type A with traffic over 50,000 vpd or freight route - Cross Road, Glen Osmond Road, Greenhill Road and South Road</li> <li>▪ Type B with traffic over 25,000 vpd, freight route, major traffic route or growth corridor - Anzac Highway, Fullarton Road, Goodwood Road, King William Road and Unley Road</li> </ul> <p>Further to the Council-wide <i>'Residential Development'</i> policy, and <i>'Overlay - Affordable Housing'</i> applied to the Urban Corridor Zone, the encouragement of affordable housing in the Residential Regeneration Zone be highlighted by inclusion of additional provisions, including Objectives 4 and 6 and Principles of Development Control 12 and 13. Principle 14 for <i>'incentives'</i> of reduced site area, open space and on-site car parking are already addressed as part of the efficiency for larger sites and the nature of smaller housing developments and is not considered warranted nor envisaged as part of the agreement for the DPA.</p>
<b>3.2.6</b>	<b>Recommended Changes</b>
	Development Strategy and Policy Committee
	<p>The City-wide <i>SAPPL 'Overlay – Noise and Air Emissions'</i> be applied to the Residential Regeneration Zone (with additional roads designated Type A (Cross Road, Glen Osmond Road and South Road) and Type B (Anzac Highway and Fullarton Road).</p> <p>The affordable housing Objectives 4 and 6 and Principles of Development Control 12 and 13 from the <i>SAPPL</i> Residential Regeneration Zone module be included.</p>