DPTI Planning Reforms

Dear Sirs

City of Salisbury submission - draft Planning and Design Code

Council considered a report on the draft Planning and Design Code Phase 3 (Urban Areas) at its meeting on 24 February 2020. Council’s endorsed submission and a more detailed practitioner review are attached to this letter.

Council welcomes the State Government’s three month deferral of implementation of the Planning and Design Code, and broadly supports the planning reforms and commends the significant amount of work undertaken to date, but considers that there are number of matters that must be addressed to have a robust Planning and Design Code that will match the aspirations of the reform.

Council has previously written to the Minister for Planning expressing its serious concerns on the consultation process and in the absence, in our view, of meaningful engagement with the local community, contrary to the Community Engagement Charter. Council was not provided the opportunity to collaborate on the spatial application of the Code and resulted in much work being required to identify the errors and omissions which could have been resolved earlier.

A significant issue was the release of the draft Code for consultation without the GIS interface making the navigation difficult of the draft Code to understand its application and impact on individual landowners. We anticipate that there will be landowners who will experience unintended and negative consequences when the Code in its present form is implemented.

As such, Council recommends that the State Planning Commission must consider and develop a process as part of the Code finalisation for the resolution of landowner issues as they become aware of the implications rather than leaving it to the individual Councils to manage.

The comments that Council has on the draft Planning and Design Code as it applies to the City of Salisbury are detailed in the Submission Summary and the Detailed Practitioner Reviews, but key issues are as follows:

Residential policy as it relates to infill development and tree planting, retention of a policy area policy for allotment dimensions and building setbacks to recognise its character, new designation of an area of wetlands at Mawson Lakes to become a Housing Diversity Neighbourhood Zone, retention of an existing Concept Plan to recognise its role in airport impacts, and a number of minor amendments to cadastre boundaries and inclusion in zones.

Centres policy has been applied inconsistently across the City of Salisbury Centres. It is recommended that a single zone approach is applied to the existing centres, and that the current Mixed Use (Bulky Goods, Entertainment and Leisure) Zone is reviewed to apply a more appropriate zone to reflect its policy intent. Reviews are also to occur with the Technical and Numeric
Variations criteria to recognise the Salisbury City Centre and Mawson Lakes Centre and building height limitations due to airport operational requirements.

**Employment Areas** at Mary/Dan Street area of Mawson Lakes must have the Code zone classification reviewed as it is clearly inappropriate, and consider the application of a more appropriate zone such as Urban Corridor (Business). The adjacent Technology Park precinct must have more appropriate policy designation so that it is changed from Urban Neighbourhood Zone to aligning with the high technology uses that now occupy sites such as the adjacent area designation as an Innovation Zone.

**Airport and Aviation Policy** is considered to be significantly inconsistent in its application, details, requirements and referrals. The City of Salisbury contains the state’s main General Aviation airport, and RAAF Base Edinburgh and it is critical to the airports, the Department of Defence, the State, Council and the public that appropriate policy is developed to recognise the airports, their operations, and the impacts on the wider community. These have not been adequately addressed in the draft Code.

**Council seaward Boundary change** has been included in the Code release, but with no consultation or briefing on the change during the realignment process. Council is disappointed with this lack of consultation and briefing on the legal implications and requires detailed information and legal advice on responsibilities for such places as the International Bird Sanctuary, mangroves and St Kilda channel.

**Local Road Widening** controls have been omitted in the draft Code and must be reinstated so as to allow clear information to be provided to the public about road design outcomes and minimising potential compulsory road acquisition requirements. Policy must be created to introduce local road widening information or mechanisms in the Code.

**Concept Plans** that are considered to be critical to the orderly and proper development of Salisbury are identified for retention, and include such matters as road links, buffer treatment of land adjoining a mining site at Gulfview Heights, acoustic treatment of dwellings at Burton for aircraft noise, and the application of multiple zones across a number of centres.

**Universal Design** should be enhanced by the development of a policy module and have training needs identified across the sectors and professions.

Another matter that should be addressed by the State Planning Commission is the preparation of policy in the event that legislation to decriminalise sex work activity passes through Parliament.

For clarification of the various matters and comments that are made in the submission and detailed practitioner reviews, please contact Peter Jansen on [Redacted] or [Redacted]

Yours faithfully

pp

Gillian Aldridge OAM
Mayor
Planning and Design Code

City of Salisbury Submission Summary

February 2020

The Submission to the Commission is comprised of three parts, namely, a Cover Letter, this Submission Summary, and Detailed Practitioner Reviews.

Residential Areas and Infill

Salisbury’s current Development Plan has limited quantitative planning policies to assess residential infill and land division applications. The benefit of this is that it provides flexibility for assessment of applications on their merit and is less restrictive than a policy which has prescriptive criteria. Conversely this lack of criteria also presents challenges for assessment of some applications.

The P&D Code policy for “General Neighbourhood” and “Design in Urban Areas” is considered to strike a balance between flexibility and overly prescriptive policy that dictates a hard and fast minimum standard. In the event an application is classified in the P&D Code as requiring a higher level of assessment, the Assessment Manager or delegate will have the ability to use quantitative policies as necessary in the event of a mediocre application or draw on qualitative policy when seeking more contextual and creative outcomes.

New policies for infill development will assist to improve design outcomes. In particular requirements for increased landscaping, on street parking and use of various materials in building frontages are considered positive inclusions.

Submission:

There are some elements however that should be reviewed such as policy for appropriate locations of higher density development in close proximity to public transport, activity centres, and open space in all relevant zones, and more detailed matters such rainwater tank requirements as this will result in owners having multiple water tanks, possibly up to three tanks considering the requirements under the National Construction Code and in bushfire risk areas. In addition, the requirement to plant a tree could be simplified to apply to lots less than 450m2 as larger sites generally have sufficient space for landscaping. It is recommended that the Commission road test these requirements with the industry.

Salisbury existing Policy Area 18 has not been incorporated into the P&D Code and will be within a General Neighbourhood Zone. This area has been identified in the past by Council as a special character area.

Submission:

It is recommended that policy is introduced into the P&D Code for this area using the existing Council guidelines for development in this policy area which seeks to have allotments have a minimum frontage of 18m, side setbacks of 900mm, rear setbacks of 7m, and a front setback that is in alignment with the existing adjoining dwellings.
Shoalhaven Greenfields Stage 2 Wetland at Mawson Lakes was retained as Multi Function Polis (Levels) zone in the Mawson Lakes rezoning of 2019 on the basis that later investigations were to occur on the continued need and effectiveness of the portion of wetland, and biological studies on flora and fauna if the area was converted to future residential use. The P&D Code has designated this area as Open Space which reinforces the current use of the area and introduces a designation that reduces the flexibility that applied with the MFP zoning. The current wetland area is designated as Community Land and would require a separate process to revocate this classification.

**Submission**

*It is considered that the proposed designation for the portion of wetland becomes a Housing Diversity Neighbourhood Zone which is the same as that in the draft P&D Code for the adjacent proposed residential zone and would better align with the stated principle of Like for Like transition.* (Accurate designation is shown in the City of Salisbury separate attachment Practitioner Reviews)

Springbank Waters residential area in Burton has existing Development Plan policy which identifies acoustic design controls because of the Edinburgh Defence Airport operations. This policy restricts dwellings to single storey construction, and has design criteria to minimise noise intrusion. The proposed P&D Code does not recognise this existing policy and has designated the area as a General Neighbourhood Zone, with no referrals to the Department of Defence or Federal Agencies. Without designation or policies there will be no restriction on dwellings and contrary to the investigations of a 1998 rezoning with the potential for impact on airport operations by resident complaints.

**Submission:**

*The retention of the existing Concept Plan 22 and policies is required, including information on the need for the policy.*

The proposed Planning and Design Code Rural Living Zone policies for the area at Globe Derby that is adjacent the Trotting Track should recognise the existing character and land use restrictions that currently apply.

**Submission:**

*It is submitted that this retention occurs through the inclusion of the current non complying land use list into the proposed Table 4 - Restricted Development Classification - for the Zone, or the application of a SubZone with policy and land use restrictions that currently exist, or other options that may be identified by the State Planning Commission in discussion with Council staff and Chairperson of the Policy and Planning Committee, in order to achieve the intended result.*

Likewise the St Kilda current Coastal Township provisions for St Kilda be mirrored in the Code.

**Submission:**

*The current Coastal Township provisions for St Kilda be mirrored in the proposed Rural Settlement provisions.*
A number of minor zone adjustments are recommended where the boundaries are slightly offset, bisected or a property is clearly located outside of its intended zone. These are identified in the Detailed Practitioner Reviews. Some of these are as follows:

Submission:

*It is recommended the following properties have the zone boundaries adjusted*

- **26 Clayson Road Salisbury East** – zone bisects property. Include whole of property within the proposed General Neighbourhood Zone.
- **26 Willochra Rd Salisbury Plains** – zone boundary realignment so that the whole of the allotment is within the proposed Employment Zone to overcome assessment difficulties with the need to currently consider residential policies for an application due to the zone boundary following the adjacent road centerline alignment.
- **16 Beadell St Burton** – Proposed Rural Zone bisects property. This site is included in a current Rural (Aircraft Noise) Direk Industry and Residential Interface DPA awaiting finalisation by the Minister which seeks to include the whole of the allotment within the proposed General Neighbourhood Zone. Refer to DPA for justification.
- **105 and 117 Bolivar Rd Burton** – minor alignment of cadastre to follow the proposed General Neighbourhood Zone boundary. Refer to the current Rural (Aircraft Noise) Direk Industry and Residential Interface DPA awaiting finalisation by the Minister for justification.
- **1 and 3 Wyatt Rd Direk** – These two properties be included in the Proposed General Neighbourhood Zone. Refer to the current Rural (Aircraft Noise) Direk Industry and Residential Interface DPA awaiting finalisation by the Minister for justification.

**Centres**

In Salisbury the existing policy applies a traditional Centres hierarchy. In some cases additional policy areas or concept plans provide further land use intent within the zones. This approach changes with the proposed Centres Zones in the P&D Code. The draft P&D code has converted existing Policy areas into Zones resulting in split Centres. For example, the Paralowie Neighbourhood Centre Zone has been transitioned into 3 separate zones (Community Facilities, Recreation and Suburban Activity Centre). This is the case for a number of other existing Centres.

There has not been a consistent approach to all Centres as highlighted for the proposed designations of the Salisbury City Centre as a single Urban Activity Zone and Ingle Farm Centre which is split into different zones. The Kings Road site opposite the Parafield Airport that was the subject of a Development Plan Amendment is currently zoned as Mixed Use (Bulky Goods, Entertainment and Leisure) Zone and is proposed to become a Suburban Employment Zone which seeks to have it contain a diverse range of low impact light industry, commercial and business activities that complement the role of other zones. Retail is severely curtailed down to 1000 sqm, ancillary to light industry, or is a bulky goods outlet.
Submission:

*It is recommended that the policy preference is to have a single zone approach to the existing Centres. More detailed recommendations can be found in the Detailed Practitioner Reviews.*

*It is considered that the Mixed Use (Bulky Goods, Entertainment and Leisure) Zone proposed P&D Code zoning classification must be review to more accurately reflect the existing policy intent.*

Technical and Numeric Variations are the detailed criteria that apply to some land uses or zones. New numeric parameters such as lot size, frontage dimensions and building heights have been introduced. Some of these are proposing significantly different quantitative criteria to the current City of Salisbury Development Plan provisions which may detrimentally impact on application numbers and assessment timeliness from this Councils viewpoint.

The Update Report on the P&D Code recognises the need to review the appropriate application of these criteria for some Centres, including Mawson Lakes Centre and Salisbury City Centre, particularly as they relate to airport building height limitations. However, it is considered the Council submission reinforce this detail.

Submission

*Ensure that the review of Technical and Numeric Variation criteria recognises and includes sites and zones within the City of Salisbury particularly as it applies to Salisbury City Centre and Mawson Lakes and building height limitation conflicts with airport operational standards.*

**Employment Areas**

Mary Dan Street in Mawson lakes was rezoned in 2019 to Urban Corridor with an underlying Business Policy Area. The P&D Code has proposed this area become an Urban Activity Centre designation which is a high level retail zone. This is a significant difference in status, placing it at the same level as Salisbury City Centre or Tea Tree Plaza.

Submission:

*The Commission must review the proposed zone classification for the Mary Dan Street area in Mawson Lakes and consider applying a more appropriate zone such as Urban Corridor (Business) Zone.*

The Technology Park precinct has been identified as a proposed Urban Neighbourhood Zone in the P&D Code. This is intended to act as a mixed use zone for high density development with an emphasis on a residential nature. The precinct is however a critical component of very recent high technology defence investment that includes Raytheon’s $30 million facility and current location of SAAB and Lockheed Martin. The P&D Code zoning should reflect the current and future strategic importance of this precinct with an emphasis on innovation and industrial development, rather than the currently proposed emphasis on residential development.
Submission:

*The Technology Park precinct should have more appropriate land use and policy designation over the area that recognises its functions, noting that the adjacent area incorporating a large section of Technology Park and the University of South Australia is designated as an Innovation Zone.*

Airport and aviation policy

There are four relevant Overlays in the P&D Code that are intended to guide development so as to not impact on airport operations. These Overlays are

- Building Heights Regulated Overlay (Parafield Airport)
- Aircraft Noise Exposure Overlay
- Building Near Airfields Overlay
- Defence Aviation Area Overlay

These Overlays are considered to be significantly inconsistent in their application, detail, requirements and referrals to obtain specialised advice. (Some relevance applies to comments in the later section on Concept Plans)

Submission:

- **Incorporate existing Development Plan detail in the Overlay mapping, or the retention of existing Concept Plan 30 (Kings Road site opposite Parafield airport), with policy links to the Building Near Airfields Module for lighting controls**
- **The Parafield Airport Australian Noise Exposure Forecast (ANEF) and the Edinburgh ANEF be included and updated as necessary in order to inform the public of the airport potential impacts, and have the ANEF contours identified in the mapping so that construction requirements in the Building Code of Australia and land use links are understood for Australian Standard 2021. There is no Referral Body specified. This information must be readily available and accessible to the public.**
- **The P&D Code must provide clarity on Referrals and the responsible entity for both civil and defence airports, and of the Performance Outcomes and Deemed To Satisfy criteria so that assessment is able to be made against identified standards for a consistent understanding and control of hazards.**
- **P&D Code to identify criteria and provide clarity of the inconsistent terminology of the Defence Aviation Areas Overlay. No building heights limitations, exhaust stack plume impacts, building windshear or turbulence criteria is provided in the written Overlay. These items are identified in the various National Airport Safeguarding Framework guidelines but there is no referencing of the Guidelines. No Referral Body is specified. This information must be included in the Overlay.**
- **Improved explanation and process is required for when the application of the Building Near Airfields Overlay is to be used compared to the Defence Aviation Area Overlay. Lighting restrictions previously available in a Concept Plan 3 in the current Salisbury Development Plan is no longer incorporated. Matters**
identified in the NASF Guidelines must be referenced and provided with criteria and Referral Bodies. Clarity is needed of when both layers apply to any particular situation.

- Existing Concept Plan 6 for Direk identifies fine grained restrictions as a result of Edinburgh operational safety and was developed in agreement with the Department of Defence. These critical restrictions have not been carried across to the P&D Code and must be retained (subject to advice from the Department of Defence).
- More detailed comments on these matters is contained in the Detailed Practitioner Reviews

The St Kilda Radar Installation is used for communications purposes by the Department of Defence particularly for Edinburgh Base purposes. It is proposed in the P&D Code to be within the Employment Zone. There has been a media announcement that a Combat Testing Facility is to be built on the site.

Submission:

*Council recommends this be changed to a Commonwealth Facilities Zone as applied to Edinburgh Airport in order to recognise its function and controlling agencies, and that policies be introduced into the Zone that seek to improve appearance of any interface areas.*

Flood Mapping

This Council does not have flood mapping in the current Development Plan. The City of Salisbury does however use recently prepared mapping as a separate tool for assessment purposes and has been awaiting the P&D Code to resolve its incorporation.

In the December Update Report by the State Planning Commission it is identified that updated mapping will be used where provided by Councils and have policy that assesses against a standardised criteria. It is unclear what format or flood assessment methodology will be required.

Submission

*The Council advises of the availability of the City of Salisbury mapping and reports for inclusion in the P&D Code.*

Council seaward Boundary change

Council has been made aware of a boundary shift further west to align with the low water mark (previously located 75m from the high watermark) while reviewing the P&D Code mapping. This has increased Councils land area by over 900ha, and consists of mangroves and ocean.

Information on this have indicated that this has not been a result of the P&D Code, but as result of state wide project to more accurately define the State Territorial Waters and
Jurisdictional lines. The State used the P&D code as opportunity to update mapping. There has been no consultation with Councils on this matter.

Submission:

*There may be significant impacts on responsibilities and legal responsibilities for such places as the International Bird Sanctuary, mangroves and St Kilda Channel. It is considered that the submission indicate a Council disappointment with the lack of consultation and information on legal implications, and requires a briefing on the matter.*

Local Road widening

The current Council Development Plan contains a table and information of building setbacks for Council controlled roads that identified future road widening needs. This provided clear information to the public about future intentions.

The P&D Code has omitted this information. The State controlled road widening information is however contained in the P&D Code with a referral trigger to the Commissioner of Highways in a Future Road Widening Overlay.

This omission will not allow Councils to undertake road widening as future development will have no regard to road and intersection upgrades, resulting in limited road design outcomes or expensive compulsory acquisition requirements and processes. The Commission should take this risk into consideration and investigate opportunities to include road local road widening mechanisms within the P&D Code.

Submission:

*The City of Salisbury requires the reinstatement the Council Boundary Setbacks from Road Boundaries tables and includes the Council as a Referral Body for local roads in the P&D Code.*

Concept plans

The P&D Code does not include any of the current concept plans from the existing Development Plan. It is considered that a number of these are necessary for proper policy guidance.

Submission:

*The following Concept Plans are retained in the P&D Code:*

- **Concept Plan 4** which prescribes a future road link into the saltfields development from the extension of Elder Smith Road to Port Wakefield Road. This emphasises the intention and need to extend the road and provide access to the new development when it occurs.
- **Concept Plan 10** which designates future buffer and remediation of the Boral Resources site at Barker Road Gulfview Heights. The level of guidance is not identified in the P&D Code Resource Extraction Zone policies
• **Concept Plan 22** which identifies the residential area at Burton that has policy acknowledging acoustic design controls for aircraft noise from Edinburgh Airfield.

• **Concept Plan 34 Salisbury City Centre future desired intent structure layout.**

• There are also a number of other detailed matters relating to concept plans which need consideration by The Commission and are identified in the Practitioner Reviews.

**Encumbrance and Land Management Agreements and policy integration**

The P&D Code drafting principles indicate that it will not cover matters that are not development, nor are of ongoing management control

Submission:

*It is considered that the P&D Code must recognise that the residential use that is within close proximity of the Gulfview Heights Boral Quarry should be subject of additional policy under an Extractive Industry Area Overlay to reflect the existing encumbrance controls that relates to this area.*

**Universal Design**

Universal design is not sufficiently represented or referenced in the P&D Code and related discussion papers. It must be recognised and identified in the appropriate policies in the P&D Code.

Submission:

**Consideration should be given to:**

- the development of a Universal Design module in the SA Planning Policy Library, drafted in collaboration between the SA Department of Planning, Transport and Infrastructure and Local Government.

- Development of a State Universal Design Training Plan by nominating a lead agency to identify training needs across all sectors and relevant professions and manage a procurement process across State Government Departments and authorities for training development and delivery.

* A more detailed commentary is made in the Practitioner Reviews.*

**Places of Worship**

The City of Salisbury undertook extensive investigations in 2006 on Places of Worship resulting in land use policy that recognises differing types of Places of Worship by size and catchment, and then sets the appropriate zone locations for each type. The P&D Code proposed policy is considered to be less appropriate.
Submission

*It is recommended that the relevant existing policy in the City of Salisbury Development Plan should be incorporated into the P&D Code to guide Place of Worship locations.*

Assessment Pathways, Notification, & Resourcing

DPTI have acknowledged in the Planning and Design Code Update Report that notification tables will need to be reviewed to exclude specific classes of development and minor/low impact development from notification. Details have not been released at this stage and but given this update it is assumed that the number of public notified applications will not substantially increase.

Notwithstanding this revised position from DPTI, the PDI Act assigns all applications that undergo public notification to the Council Assessment Panel for assessment. By comparison, Council’s delegations currently only assign development applications to the Panel where the representor wishes to make a verbal. Even if the Code is amended to maintain the current number of public notified applications, it appears that there will be a significant increase in the number of development applications assigned to the Panel for assessment by the regulations. The Panel generally considers about 20 applications per year but some 70 to 80 applications (average) undergo public notification. The Panel is able to delegation applications to staff, but this require the Panel to play an increased administrative and oversight role.

Submission

*It is recommended that public notification triggers be simplified to remove the need to notify developments that would ordinarily and reasonably be expected within a zone, such as dwellings that are street fronting in residential zones and retail / commercial uses in retail type zones.*
## Detailed Practitioner Review 1

### PD Code Aviation Policy impacting Salisbury

<table>
<thead>
<tr>
<th>Zones</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Commonwealth Facility Zone</strong></td>
<td>Applies to Edinburgh and Parafield Airports</td>
</tr>
<tr>
<td><strong>Accepted Development Table 1</strong></td>
<td>Standard matters listed</td>
</tr>
<tr>
<td><strong>Deemed to satisfy</strong></td>
<td>None</td>
</tr>
<tr>
<td><strong>Performance Assessed</strong></td>
<td>All policies and overlays</td>
</tr>
<tr>
<td><strong>Restricted Development</strong></td>
<td>None</td>
</tr>
<tr>
<td><strong>Assessment Provisions</strong></td>
<td><strong>Desired Outcome (DO)</strong></td>
</tr>
<tr>
<td></td>
<td>DO 1</td>
</tr>
<tr>
<td></td>
<td>A zone accommodating nationally significant aviation and defence related activities.</td>
</tr>
</tbody>
</table>

[NOTE: Land in the zone is subject to Commonwealth laws where development may occur without the need for an approval under the Planning, Development and Infrastructure Act 2016. In circumstance where a class of development is proposed that is subject to State planning laws, the development is subject to assessment against the Planning and Design Code]

**Performance Outcomes and Deemed to Satisfy / Designated Performance Outcome Criteria**

- **Land Use**
  - PO 1.1  
  Commonwealth aviation and defence related development and complementary activities.
  - DTS/DPF 1.1  
  None are applicable.

**Procedural Matters (PM)**

- **Notification**  
  None specified.

- **Placement of Notices – Exemptions for Performance Assessed Development**  
  None specified.

- **Placement of Notices – Exemptions for Restricted Development**  
  None specified.

**Comments**  
Sites are not under planning control of state or local government, but policy promoting better development for the significant interface with the community is missing which can help identify and promote better outcomes.

**Note**  
Edinburgh Radar installation at St Kilda not identified as a Commonwealth Facility, but included in Employment Zone. Suggest this be raised as potential change and that DPTI consultation occurs with Defence.
Recent proposal for Combat Testing Facility at site (TBC) (shown left) Site confirmation required.

Suspected Site across two Councils, and comprised as Rural Horticulture and Employment in PD Code (shown right).

**Recommended PD Code response**

Replace draft PD Code identification of Rural Horticulture and Employment Zones for the Edinburgh Radar Installation site at St Kilda with the Commonwealth Facility Zone, and recommend incorporation of a PO that seeks to improve appearance of any interface areas with residential type zones.

**General Neighbourhood Zone**

<table>
<thead>
<tr>
<th>Accepted Development</th>
<th>Standard matters listed in Table 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deemed to satisfy</td>
<td>Various listed in Table 2</td>
</tr>
</tbody>
</table>

**Performance Assessed**

Detached Dwellings etc requires consideration of the following relevant o/l
- Aircraft Noise Exposure – **no referrals** or criteria in PD Code or Regs
- Airport Building Heights Regulated – **Referral to DIRDC** when heights greater than OLS
- Building Near Airfields – **no referral in PD Code, but C’wealth is identified in the Regulations as a referral body.**
- Defence Aviation – **no referrals** in PD Code or Regs

**Restricted Development**

Shop unless gla less than 1000sqm

**Assessment Provisions**

**Desired Outcome (DO)**

**DO 1**

Low-rise, low and medium-density housing that supports a range of needs and lifestyles located within easy reach of a diversity of services and facilities. Employment and community service uses contribute to making the neighbourhood a convenient place to live without compromising residential amenity

**Performance outcomes** as listed in table 4

**Concept Plans**

PO 9.1

Development is compatible with the outcomes sought by any relevant Concept Plan contained within the Concept Plans Technical and Numeric Variation Overlay.

DTS/DPF 9.1

None are applicable

**Procedural Matters** as listed
| **Comments** | Proposed PD Code does not differentiate the area identified in existing Concept Plan 22 from the main proposed General Neighbourhood Zone.  

The identified area derived from the approved 1998 Burton/Direk Residential DPA which considered the aviation requirements for Edinburgh Airport. Acoustic studies for the DPA showed that some areas were affected by airplane noise. This identified area had policy applied which restricted dwelling height to one storey and had requirements for dwelling design to minimise the effects of noise by applying 9 building criteria. Even though only part of the estate area was above the 25 ANEF limit of the day, the whole of the estate area was specifically identified in order to provide clarity. (from the DPA)

This was critical to receiving the agreement of the Department of Defence to support the DPA.  

It should be noted that current NASAF Guideline is to identify 20 ANEF as the limit. The current Forecast for Edinburgh is mapped in the Aircraft Noise Overlay. |
| **Notes** | Unknown how the Aircraft Noise Overlay would be used to provide guidance and additional consideration or restriction on dwellings and their acoustic treatment design not specifically restricted in the General Neighbourhood Zone, and if breaches exist, which Govt Body/Minister is responsible for considering variations.  

If Building Code is to be used to provide acoustic assessment at the buildings approval stage, it is not known how the affected areas are to be identified and linked to the building approval. |
| **Recommended PD Code response** | The Concept Plan area needs to be continued to be identified so that the restriction applies in some manner – Concept Plan must be retained, and information that indicates why it is applied. |

**PD Code Overlays**

| **Airport Building Heights Regulated (Parafield airport)** | **Desired Outcome (DO)** |
| **Assessment Provisions (AP)** | DO 1  
Management of potential impacts of buildings on the operational and safety requirements of certified commercial and military airfields, airports, airstrips and helicopter landing sites. |
### Performance Outcomes and Deemed to Satisfy / Designated Performance Outcome Criteria

#### Built Form

**PO 1.1**
Building height does not pose a hazard to the operation of a certified aerodrome.

**DTS/DPF 1.1**
Building height does not exceed the Obstacle Limitations Surface (OLS) in the Airport Building Heights (Regulated) Technical and Numeric Variation Overlay.

**PO 1.2**
Development is adequately separated from runways and other operational facilities within certified aerodromes to minimise the potential for building generated turbulence and windshear.

**DTS/DPF 1.2**
The distance from any part of a runway centreline to the closest point of the building is 35 times building height or more

### Procedural Matters (PM)

#### Referrals

**Class of Development / Activity**
Development of a building height which would exceed the Obstacle Limitation Surface.

**Referral Body**
Commonwealth Secretary for the Department of Infrastructure, Regional Development and Cities

**Purpose of Referral**
To provide expert assessment and direction to the relevant authority on potential impacts on the safety and operation of aviation activities.

### Comments

Existing policy in Salisbury Dev Plan uses both the height control as shown in the Overlay, and the finegrained controls in Concept Plan 30 for the Kings Junction site.

Council request to Minister to amend height restriction mapping in Salisbury Plan for the “All Development areas” was not allowed. Response was to identify it would be progressed through the PD Code. The detail for the Kings Road site was developed through the DPA and included aviation policy on public safety areas, lighting and building heights.

Existing Kings Road site policy has not been transferred to the PD Code in the Salisbury instance; however, it has been transferred for the City of Adelaide. Refer map excerpt in the PD Code below.

<table>
<thead>
<tr>
<th>Overlay</th>
<th>Existing policy- Concept Plan 30</th>
</tr>
</thead>
</table>

![Overlay](overlay.png) ![Existing policy- Concept Plan 30](existing.png)
Referral is identified in Code and InRegs:

DPI General Regs Schedule 9 Referrals as follows:

17—Airports  Development that is (a) in the Airport Building Heights Overlay or Building Near Airfields Overlay under the Planning and Design Code; and (b) specified by the Planning and Design Code as development of a class to which this item applies.

To: Commonwealth Minister for the time being administering the Civil Aviation Act 1988 (Commonwealth) Direction - 20 business days

Recommended Response

PD Code to incorporate existing detail in the Overlay mapping, and or include existing Concept Plan 30. Links to Building Near Airfields module for lighting controls.

Aircraft Noise Exposure

Desired Outcome (DO)

DO 1
Development sensitive to aircraft noise designed to manage noise intrusion to reduce land use conflict and protect human health.

Performance Outcomes and Deemed to Satisfy / Designated Performance Outcome Criteria

PO 1.1
Buildings that accommodate activities that are sensitive to aircraft noise designed to minimise aircraft noise intrusion and provide appropriate interior acoustic amenity.

DTS/DPF 1.1
None are applicable

Procedural Matters (PM)

Referrals

Class of Development / Activity  Referral Body  Purpose of Referral

None

Comments

Refer to comments and issues in General Neighbourhood Zone item above.

Only Edinburgh Airfield ANEF contours in the PD Code (and part of Adelaide Airport, but no Parafield Airport). The Overlay applies to the area identified as 20 ANEF, but there are no other contour designations or explanation of what and why it is applied.

ANEF Contour designations are required for assessment against AS 2021. AS 2021 applies differing allowances for different land uses and construction materials and methods. Map must exist with contour designations to allow
identification of restrictions over affected land.

Parafield Airport noise contours have been available for introduction for some time into the Development Plan but has required a DPA. It was anticipated that the PD Code preparation would integrate the ANEFs for Parafield into its policy, but has not occurred. It is robust information derived from the airport Masterplans and mapped and approved by Air Services Australia and the Federal minister.

Notes

The initial information from DPTI on the PD Code preparation was that the intention was to include these types of matters, however, as the rollout has progressed, there has been a strong shift away from introducing “new” elements and only producing a like for like version of the PD Code. However, many elements of the PD Code do not align with this intention. Seeing that the ANEFs has been a federal policy since the 1970s, it is considered that the State should decide to either include the information, or adopt a linkage to this type of information that is clear, concise and informs why and where it applies.

Recommended Response

The PD Code include the Parafield Airport ANEF in order to inform the public on the airport potential impacts and have the contours identified so that construction and land use links to AS 2021 are possible, or the PD Code include references and links to the available information in an easily accessible location and manner.

Building Near Airfields

Assessment Provisions (AP)  Desired Outcome (DO)

DO 1
Management of lighting and bird attraction impacts on the operational and safety requirements of certified commercial and military airfields, airports, airstrips and helicopter landing sites.

Performance Outcomes and Deemed to Satisfy / Designated Performance Outcome Criteria  

PO 1.1
Outdoor lighting does not pose a hazard to commercial or military aircraft operations.

DTS/DPF 1.1
Development does not include outdoor floodlighting

PO 1.2
Development likely to attract birds adequately separated from airfields to minimise the potential for aircraft bird strike.
Development incorporating one or more of the following land uses is located not less than 3km from the boundaries of an airport used by commercial or military aircraft:

- food packing/processing plant;
- horticulture;
- intensive animal husbandry;
- showground;
- waste management facility;
- waste transfer station;
- wetland; or
- wildlife sanctuary.

Buildings and structures that are sensitive to aircraft noise designed to minimise aircraft noise intrusion and provide appropriate interior amenity.

None are applicable

**Procedural Matters**

**Referrals**
Class of Development / Activity

Referral Body / Purpose of Referral

None

Referrals

DPI General Regs Schedule 9 Referrals as follows:

17—Airports

Development that is:

(a) in the Airport Building Heights Overlay or Building Near Airfields Overlay under the Planning and Design Code; and

(b) specified by the Planning and Design Code as development of a class to which this item applies.

To: Commonwealth Minister for the time being administering the Civil Aviation Act 1988 (Commonwealth) Direction - 20 business days

Recommended Response

PD Code must provide clarity on Referrals, and clarity on criteria of the PO’s and DTS so that an assessment is able to be made on what constitutes hazards.

**Defence Aviation Area**

**Assessment Provisions (AP)**

**Desired Outcome (DO)**

DO 1

Management of potential impacts of buildings on the operational and safety requirements of Defence Aviation Areas.

**Performance Outcomes and Deemed to Satisfy / Designated Performance Outcome Criteria**

Built Form

PO 1.1

Building height does not pose a hazard to the operations of Defence Aviation Areas.

DTS/DPF 1.1

Building height does not exceed the relevant height specified by the Defence Aviation Area Technical and Numeric Variations Overlay.

PO 1.2

Exhaust stacks are designed and sited to minimise plume impacts on the
operations of Defence Aviation Areas.

DTS/DPF 1.2
None are applicable.

PO 1.3
Buildings are adequately separated from airfields to minimise the potential for building generated turbulence and windshear.

DTS/DPF 1.3
The distance from any part of the runway centreline to the closest point of the building is greater than 35 times building height.

**Procedural Matters (PM)**

<table>
<thead>
<tr>
<th>Class of Development / Activity- Referral Body - Purpose of Referral</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
</tr>
</tbody>
</table>

**Comments**

No criteria identified or linkages indicated to assess compliance with the PO and DTS.

DTS/DPF 1.1 building heights indicates that development not to exceed Defence Aviation Area Technical and Numeric Variations Overlay. This is confusing – is it the Overlay as written, or is it the Consultation Map Viewer layer information, or is it a TNV layer not provided in the draft PD Code? Criteria must be identified

With no linkages to criteria, there must be a Referral Body to consider proposals. Council cannot consider the matters as controlled by the Defence Act 1903 of Commonwealth.

**Notes**

From PDI Regs 3.1 Interpretation "designated airport building heights area means an area identified under the Planning and Design Code (whether by use of an overlay or otherwise) as a designated airport building heights area"

From Part 5, PD Code Designated Areas Table 1
Areas identified as ‘designated airport building heights area’ for the purposes of clause 3(1) of the Regulations – Interpretation

- Airport Building Heights (Aircraft Landing Areas) Overlay
- Airport Building Heights (Regulated) Overlay
- Defence Aviation Area Overlay

**Recommended Response**

The criteria must be provided, and clarity given to the confusing terminology of “Defence Aviation Area Technical and Numeric Variations Overlay” because there are no building heights specified in the written Overlay. Linkages to the criteria must be clear and concise.

There must be a Referral Body identified in Procedural Matters that is the authority for consideration of operational safety when proposals don’t meet the criteria (that has not been identified in the Overlay)
City of Salisbury feedback on the SA Planning and Design Code  
(Phase 3) Amendment

22 January 2020
Contribution from Community Health and Wellbeing Division, Community Development
Mike Taggart, Inclusion Project Officer
Myfanwy Mogford, Diversity and Inclusion Project Officer

Introduction
Universal design is not sufficiently represented in the Code and discussion papers. The City of Salisbury provides two types of feedback on universal design and the SA Planning and Design Code amendment:

- Implementation recommendations
- Content suggestions.

Universal design extends beyond the scope of the Planning and Design Code but many aspects of universal design will remain an aspiration without practical implementation measures to accompany the Code.

Under the SA Disability Inclusion Act 2018 and its Regulations all State authorities including Local Government must publish a Disability Access and Inclusion Plan by 31 October 2020. These must take into account the priorities in the State Disability Inclusion Plan “Inclusive SA” published on 31 October 2019. The State Disability Inclusion Plan includes a priority Action 16 on universal design.

Council’s response to this legislation is the “Ability Inclusion Strategic Plan 2020 – 2024”. The “AISP” references universal design in four of its 8 Outcome areas and in a number of Strategies under these Outcomes (see quotations in Attachment 1).

Feedback on the SA Planning and Design Code amendment (Phase 3)
The new planning system can enable universal design through measures to provide guidelines and resources. But without these the planning reforms will frustrate its implementation.

Implementing universal design in the Planning and Design Code amendment

Developing a universal design module in the SA Planning Policy Library
Council recommends that the State Planning Commission give priority to the development of a universal design module in the SAPPL. This will give practical support for developers, planners and regulators in giving “serious consideration to universal design”.

The fourth dot point under “Transitioning to the Planning and Design Code” Provides the mechanism to develop these guidelines and resources for the application of universal design:

“The need for further investigations and research which may be required to properly inform new policy directions”.

Council is investigating the feasibility of securing funding from the Local Government Association R & D Scheme and other sources to develop universal design guidelines and examples. This is one action to implement its commitment quoted in Attachment 1.

Collaboration with the SA Department of Planning, Transport and Infrastructure would enable the development of a state-wide resource bringing consistency across all levels of development.

This initiative will give effect to the Code and to the State Disability Inclusion Plan:

I. Development of an SAPPL universal design module will support the three references to universal design in the Code which Council supports:

- built form and the public realm should be designed to be inclusive and accessible to people with differing needs and capabilities (including through the serious consideration of universal design practices)” (Part 2, Division 1, Section 14, c, iv).
- “Promote high standards for the built environment through an emphasis on design quality in policies, processes and practices, including by providing for policies and principles that support or promote universal design for the benefit of people with differing needs and capabilities (Part 2, Division 12, Section 2 d)
- “The design quality policy must include specific policies and principles with respect to the universal design of buildings and places to promote best practice in access and inclusion planning”. (Part 5, Division 2, Section 59, 2)

2. This will also address a priority action in the SA Government’s recently launched “Inclusive SA: State disability Action Plan 2019 – 2023” Action 16:

- “Action 16. Elevate the design quality of South Australia’s built environment and public realms through promoting design quality policy and the principles of Universal Design”.

Universal design professional development plan
Council also recommends that the State Planning Commission gives priority to development of a State Training Plan in universal design by nominating a lead agency to:

- identify training needs across all sectors and relevant professions
- manage a procurement process across State Government Departments and authorities for training development and delivery by accredited access consultants with training accreditation.

A systematic State Training Plan in universal design can remedy the lack of SA Government agency universal design knowledge and skills and can be a platform to include Local Government and industry on a fee for service basis.
Feedback on content in the SA Planning and Design Code Phase 3 and associated papers

Design in Urban Areas
A general reference to “pedestrians” glosses over the diversity of this population, resulting in design which disadvantages parents using strollers and pushers, seniors using walking frames and people with disability of all ages.

Council recommends that the bolded text below be included in the document on page 2,227

- “integrating landscape design to optimise pedestrian and cyclist usability”

Development that is:

- “inclusive — by integrating landscape design to optimise cyclist and pedestrian usability, privacy and equitable access including application of universal design principles and policies, and also promote the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors alike;”.

Design Review
This can be extended to land divisions. The review process must include accredited access consultants to ensure competent application of universal design principles.

Universal design in the “People and Neighbourhoods” discussion paper
There is no reference to universal design in this discussion paper. Staff have consulted with Disability Access and Inclusion Network members and make the following observations and suggestions.

Key considerations and trends
There is recognition of ability diversity:

- “Our population is older, almost 25% live with some form of disability…”

There is no analysis of the sub-populations within this segment and the implications for planning and design. This and the reference to the ageing part of the population receive no further mention in terms of liveable and “whole of life” housing and public realm design.

There is no reference to the de-institutionalisation of many people with disability since the 1980’s nor to the future impact of the National Disability Insurance Scheme. Account must be taken of the current Royal Commission into Violence, Abuse, Neglect and Exploitation of people with disability (the “Disability royal Commission”). Of most relevance is its discussion paper and hearings on group homes which grew from the de-institutionalisation period. These have reproduced institutionalised and segregated housing in many locations impacting on the quality of life of their residents and poor integration with neighbouring communities.
Universal design in the public realm
The Code should promote universal design as part of design quality including the public realm. Council recommends improvement of the current text under “Key areas of improvement” with the bolded text below:

• “In preparing the Code, these policies must be updated to align with the direction set by the State Planning Policies and deliver high quality design outcomes, in particular how residential developments contribute to the context and rhythm of surrounding neighbourhoods and streetscapes. They must also reflect evolving household needs and respond to challenges associated with our changing population especially through the application of universal design”.

Strategic importance of universal design in the Code
The paper correctly emphasises on p. 24 the importance of alignment with the State Planning Policies. But there are other government policies and plans which should be referenced – see the bolded text:

• “The policies set out in the Code must reflect and align with the State Planning Policies, because ultimately they provide the critical strategic framework upon which the Code itself is based. The Code or the State Planning Policies also need to reflect the State Disability Inclusion Plan “Inclusive SA” which become operational on 31 October 2019, in particular its Action “16”

Action 16: Elevate the design quality of South Australia’s built environment and public realms through promoting design quality policy and the principles of Universal Design”.

The discussion paper misses opportunities to promote design which enables people of all ages and abilities to participate without environmental barriers. Council suggests for example the following text be changed with the bolded additions

Integrated Planning
Coordinates the strategic use of land with the necessary services and infrastructure. It can influence how a city or region grows and evolves, which if done well, creates liveable and sustainable places that contribute to our prosperity. ISPP

“GOOD DESIGN improves the way our buildings, streets and places function, making them more sustainable, more accessible, more usable by people of all ages and abilities, safer and healthier.”

Housing preferences
The paper focuses on ageing without differentiating between housing preferences resulting from household type and diversity of abilities. The paper doesn’t address the latter. The ABS Survey of Disability, Ageing and Carers 2018 shows that one in two (49.6%) of people aged
65 years and over report experiencing disability (ABS SDAC Ref. No. 4430.0). The paper will be strengthened by explicit acknowledgement of the relevance of universal design in housing for older people living in the community and for people of all ages living with disability.

A Disability Access and Inclusion Network member summarised her aspiration for the People and Neighbourhoods paper:

A person with disability, of any age, doesn’t want to complain in order to have their basic housing and community access needs recognised. Their physical and psychological needs can be achieved by including universal design in every aspect of planning and implementation. Basic human rights can be included in planning to allow quality of life and capacity building through community participation by the diversity of people with disability.”
Ability Inclusion Strategic Plan 2020 – 2024 - AISP references to universal design

Council endorsed the AISP on 25 November 2019. The AISP is the high level part of a “Disability Access and Inclusion Plan” (DAIP) required by the SA Disability Inclusion Act 2018.

The AISP depends on the development of universal design guidelines and resources for its implementation. The AISP has eight Outcomes three of which include strategies referring to universal design and one with strategies assuming the application of universal design:

Outcome 1 - Support for Health and Wellbeing through Inclusive Programs, Services and Events
Strategy 1.1.

Council will deliver programs and activities that adhere to Universal Design Principles and provide people with disability opportunities to build capacity and confidence, and connect with others.

Outcome 2 - Accessible Buildings Streets and Open Spaces

2.1.1

Access and inclusion criteria are developed and included in asset audits for all asset categories as appropriate.

2.1.3

New design process (including renewals) incorporates consideration of social inclusion and of provision for inclusive design in the playspace hierarchy by the Asset Management Sub Committee.

Strategy 2.2

Council will use its guidelines and regulatory functions to enhance accessibility of foot paths and public spaces for all abilities.

Outcome 5 - Proactive Planning and Building Assessment Processes

Strategy 5.1.

Council will facilitate building development and open space outcomes that exceed minimum standards by using an access and inclusion planning lens. This will be achieved through policy and guidelines that facilitate engagement with stakeholders early in the planning process reflect universal design principles and encourage use of new technologies that increase accessibility.

5.1.2
Review and update policy and guidelines across Council to ensure Universal Design Principles are embedded in planning and development except where State Planning Policies prevail.

5.1.5

Provide training and support that facilitates staff awareness and adoption of universal design principles and co-design principles.

5.1.6

Advocate for application of universal design in SA Planning & Design Code.

5.2.4

Facilitate the adoption of Universal Design Principles in the local building and development sector.

**Outcome 6 - Informed and Supportive Working Environments**

6.2.3

Continue to improve physical and Information and Communication Technologies (ICT) access for employees and volunteers across Council, ensuring adherence to Universal Design Principles
GENERAL DEVELOPMENT PLAN ISSUES LIST

Key priorities identified were:

1) Insert policy to encourage increased densities/building heights/smaller allotment sizes in appropriate locations in the General Neighbourhood Zone, also encourage 3-4 storey medium density development in the Housing Diversity Zone
2) Recognise Policy Area 18 as a Character Area or apply a unique TNV
3) Transition place of worship from General Section, Development Plan
4) Replace the current Zones proposed under the Airport Building Heights (Regulated) Overlay with the OLS contours
5) Review the exceptions to the Notification across all Zones to clarify that development adjacent to another zone only applies where it relates to development in a non-residential zone adjacent to a residential zone interface
6) Transition Table Sal/1 of the Development Plan into the P&D Code
7) Recommend changes to DPTI to address the current gap in the system by amending the definitions for dwellings (To address issue of ‘site’);
8) Nominate alternative like for like zoning for the Urban Corridor Zone (properties east of Sharp Court)
9) Amend the “Building Height Data Overlay” to prescribe a 3 storey height limit for Mawson Lakes (Housing Diversity Neighbourhood Zone) or 4 storeys for medium density housing
10) Transition Edinburgh Defence Concept Plan Maps and associated airport policy
11) Delete the Open Space Zone as it relates to the Port Wakefield Road corridor at Cavan
12) Correct Zone boundary anomalies
13) Identify numerical values for freestanding signs
14) Consider implications of the Strategic Infrastructure Gas Pipelines Corridor for the saltfields and Port Wakefield Road corridor

Matters that should be addressed by the P&D Code:

<table>
<thead>
<tr>
<th>First Identified</th>
<th>Location / zone in Salisbury Development Plan</th>
<th>Description / Example</th>
<th>Priority / Significance</th>
<th>Addressed under P&amp;D Code</th>
<th>Action / Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 2016</td>
<td>Areas adjacent high pressure gas mains</td>
<td>Suggest blast zone as overlay in Development Plan</td>
<td>Medium</td>
<td>Yes - A Strategic Infrastructure Gas Pipelines Overlay is proposed under the P&amp;D Code. The Overlay has significant implications</td>
<td>Review implications of Overlay for development in the Saltfields and along the Port Wakefield Road corridor</td>
</tr>
<tr>
<td>Date</td>
<td>Location</td>
<td>Issue Description</td>
<td>High</td>
<td>Yes/No</td>
<td>Notes</td>
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</tr>
<tr>
<td>January 2016</td>
<td>17 Chess Street, Salisbury East</td>
<td>Zone boundary cuts through property</td>
<td>High</td>
<td>No</td>
<td>The Zone boundary between the General Neighbourhood Zone and Suburban Employment Zone should be adjusted to reflect cadastral boundaries</td>
</tr>
<tr>
<td>January 2016</td>
<td>Airport Height Maps</td>
<td>Airport height maps for Parafield Airport do not pick up the height triggers applicable to the Edinburgh airbase. The Concept Plan for Edinburgh is in the Maps, however, the specific Zones for Edinburgh are not picked up on the maps for Parafield.</td>
<td>High</td>
<td>Yes</td>
<td>- A Defence Aviation Area Overlay will apply to Edinburgh Defence whereas an Airport Building Heights (Regulated) Overlay will apply to Parafield. Some of the specific policy applicable to Edinburgh Airfield has been dropped.</td>
</tr>
<tr>
<td>May 2016</td>
<td>Zone boundary anomaly</td>
<td>Residential/Industrial Zone boundary is not aligned with the property boundary for the site at 26 Willochra Road, Salisbury Plain</td>
<td>High</td>
<td>No</td>
<td>The Zone boundary between General Neighbourhood Zone and Employment Zone should be adjusted to reflect cadastral boundaries</td>
</tr>
<tr>
<td>Date</td>
<td>Zone</td>
<td>Issue</td>
<td>Zone</td>
<td>Solution</td>
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<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>May 2016</td>
<td>Commercial Zone</td>
<td>PDC 6 states that advertisements should not exceed 4m, however, Council-wide PDC 18 under “Advertisements” module states that signs can be up to 8m in the Greenfields Policy Area</td>
<td>Low</td>
<td>Yes and No – Refer to General Section, “Advertisements”, Table 1 contains Maximum Size and Height Requirements but does not contain a value next to many of the Zones</td>
<td></td>
</tr>
<tr>
<td>May 2016</td>
<td>Multiple Dwelling car parking rates</td>
<td>Car parking rate in Table Sal/2 only suggests that 1 space is required per dwelling, plus 0.5 on-site visitor car parking spaces. We are following up on a number of CRM’s where multiple persons are living in the one dwelling – the common issue is car parking. While we aren’t presently getting a lot of DA’s for these types of uses, there is potential concern that the existing rate will result in car parking issues as in our experience majority of the individuals have cars? is there an issue somewhere</td>
<td>Medium</td>
<td>Yes – Refer to General Section, “Transport, Access and Parking”, Table 1 requires 1 space per 1 or 2 bedroom dwelling for detached, group dwelling or residential flat building or 2 spaces per 3 or more bedroom dwelling, 0.33 spaces per dwelling for visitor parking is required where development involves 3 or more dwellings. Insert additional policy requiring additional parking (perhaps 0.5 per bedroom) for multiple dwellings having 4 or more bedrooms.</td>
<td></td>
</tr>
<tr>
<td>May 2016</td>
<td>Disable car parking</td>
<td>Table Sal/2 does not list a number of disabled spaces required</td>
<td>Medium</td>
<td>No – Refer to General Section The parking rate for</td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Category</td>
<td>Description</td>
<td>Level</td>
<td>Test</td>
<td>Recommendation</td>
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<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
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<td>--------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>June 2016</td>
<td>Residential Zone: Desired Character Statement and general provisions relating to front setback and density</td>
<td>Existing policy seeks development that is keeping with existing character in terms of front setback and density, yet policy also encourages infill and greater densities. There is an inherent conflict in the policy – examples of DA’s where this has come up are as follows: Density – Ada Street (361/1643/2015); Front Setbacks – 5 Bungaree Street, Salisbury (361/2235/2015) and 5 Belalie Road, Ingle Farm (361/377/2016)</td>
<td>High</td>
<td>Yes and No – Conflict in the policy is removed but policy has shifted away from increased densities in appropriate locations. Refer to General Neighbourhood Zone, PO 2.1, DTS/DPF 2.1, PO 3.1 and PO 4.1. Policy references are scaled back and seek low rise built form character of max 2 storeys, allotment sizes of 300m².</td>
<td>Insert policy that encourages increased densities/building heights/smaller allotment sizes in appropriate locations.</td>
</tr>
<tr>
<td>July 2016</td>
<td>General Section Community Facilities Module</td>
<td>PDC 4 – does not contain any reference to places of worship having a congregation of between 30 and 100 attendees</td>
<td>Medium</td>
<td>No</td>
<td>Local content relating to places of worship should be retained and hierarchy modified to contemplate places of worship between 30 and 100 attendees.</td>
</tr>
<tr>
<td>July 2016</td>
<td>Residential Zone, Policy Area 22</td>
<td>PDC 3 states residential development should result in net densities of between 35 and 70 dwellings per hectare and have</td>
<td>Medium</td>
<td>Yes and No – Mawson Lakes is proposed to be Amend the “Building Height Data Overlay”</td>
<td></td>
</tr>
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<td></td>
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</tr>
</tbody>
</table>
a maximum building height of at least 3 storeys and no more than 4 storeys. The sentence does not appear to make sense as it is saying a maximum of 3 storeys yet allows for up to 4 storeys. In addition, this Policy Area appears to apply quite broadly to most of Mawson Lakes. Two storey development is reasonably expected and therefore the policy should be revised to bring down the minimum number of storeys (ie. at least two storeys).

March 2017

Open Space Zone/Industry Zone

Map Sal/46 – this section of Pt Wakefield Rd is zoned Open Space and it dissects this industrial precinct. As a consequence development applications on sites that adjoin this Open Space Zone are category 2 development. This is unnecessary & the entire precinct should be within the Industry Zone.

Furthermore, the Industry Zone boundary in this precinct should encompass the buffer areas, removing the need for category 2 notification when the site adjoins a buffer or wetland.

March

47 Burton Road – The extent of listing in Table Sal/4 – State Heritage Places for

Low

No – The extent of State

Clarify with DPTI
<table>
<thead>
<tr>
<th>Year</th>
<th>Category</th>
<th>Description</th>
<th>Medium</th>
<th>Priority</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>State Heritage Item</td>
<td>47 Burton Road – “Dwelling (Douglas Park Farm) &amp; Front Fence” includes the front fence. Under DA 361/29/2017, the fence is proposed to be removed/replaced. Inspection of the site suggests the front fence is not of any heritage value. It is also noted that no mention was made of the value of the front fence by Heritage SA. It is suggested that the table/listing be revised to remove reference to the fence.</td>
<td></td>
<td></td>
<td>Heritage listing have been removed from the P&amp;D Code.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>N/A</td>
<td>Category 2</td>
<td>Whether extent of listing of State Heritage Items shall transition into the P&amp;D Code.</td>
</tr>
<tr>
<td>March</td>
<td>Industry Zone – Interface with other Zones</td>
<td>Application 361/290/2017 – change of land use from warehouse to industry and building extension. The application is technically Category 2 due to the site being ‘adjacent’ to land in the Mixed Use Zone. The proposed development is envisaged within the Zone and is therefore considered to be appropriate. As Schedule 9 of the Regulations 2008 applies, issue is broader than the City of Salisbury Plan, however, is a relevant issue that should be explored.</td>
<td>Medium</td>
<td></td>
<td>Review the exceptions to the Notification across all Zones to clarify that development adjacent to another zone only applies where it relates to development in a non-residential zone adjacent to a residential zone interface.</td>
</tr>
<tr>
<td>April</td>
<td>PDC 3, General Section, Residential Development Module</td>
<td>PDC 2 states that “Buildings on battleaxe allotments or the like should be single storey and be designed to maintain the privacy of adjoining properties”. This PDC conflicts with other provisions in the Residential Zone which seek increased densities and development of up to 4 storeys. There is a tension in the policy relating to retention of existing character vs new character. This provision is also unclear whether it is intended to apply to community title development (ie. common internal driveway). This is technically not a battleaxe but results in dwellings behind one another in the same configuration as a battleaxe.</td>
<td>Medium</td>
<td></td>
<td>Yes and No – Policy limiting buildings on battleaxe allotments to single storey has been removed. A ‘Battle-axe allotment’ is now defined in the P&amp;D Code.</td>
</tr>
<tr>
<td>August</td>
<td>General Section, Advertisements Module</td>
<td>Heights of signs for different Zones and Policy Areas are contained under PDC 18. It may be useful to consider an accompanying PDC that relates the signage to the height of a</td>
<td>Low</td>
<td></td>
<td>Yes and No – Refer to General Section, “Advertisements”, Table Identify numerical values for freestanding signs in the P&amp;D Code.</td>
</tr>
<tr>
<td>August 2017</td>
<td>Table Sal/1</td>
<td>There is a need to review the relevance of all existing “Building Setbacks from Road boundaries” and whether they are still warranted. It is understood City Infrastructure is undertaking a strategic review of all sub-arterial roads and determining requirements with respect to road widening. There is a need to review these and determine instances where building setbacks for road widening need to be retained or applied and to ensure that standards contained within the Development Plan reflect this. These also need to be identified as an overlay for the new planning and design code.</td>
<td>High</td>
<td>No – Table Sal/1 has not transitioned in the P&amp;D Code.</td>
<td>Transition Table Sal/1 of Development Plan into P&amp;D Code, subject to any revisions recommended by City Infrastructure</td>
</tr>
<tr>
<td>November 2018</td>
<td>Zone Boundary Anomaly</td>
<td>The Zone Map Sal/31 shows the Zone boundary between the Primary Production and Open Space Zones cutting through the site of 813-825 Port Wakefield Road and is not aligned with cadastre.</td>
<td>Medium</td>
<td>No – Site is dissected by the Open Space Zone and Rural Zone.</td>
<td>Align the proposed PD Code zone with the allotments in the new zone</td>
</tr>
<tr>
<td>November 2018</td>
<td>Zone Boundary Anomaly</td>
<td>101 Wynn Vale Drive, Gulfview Heights. Zoned as Open Space.</td>
<td>Medium</td>
<td>No – Site is proposed to be located within the Open Space Zone.</td>
<td>Zone property as General Neighbourhood Zone or Suburban Neighbourhood Zone</td>
</tr>
<tr>
<td>Date</td>
<td>Location/Zone Description</td>
<td>Description</td>
<td>Rating</td>
<td>Action</td>
<td>Reason</td>
</tr>
<tr>
<td>------------</td>
<td>-------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td>---------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>April 2019</td>
<td>Residential Policy Area 18</td>
<td>Land division and dwellings within Residential Policy Area 18, Rescode applies and is undermining intent for wider frontages and allotment areas. DA 361/627/2019 and DA 361/629/2019 are both for land divisions in Lawrie Avenue and example of where we are reconciling conflict between what our Policy (including Council endorsed information sheet/position) seeks and what is being approved by Rescode.</td>
<td>High</td>
<td>Recognise Policy Area 18 in the P&amp;D Code through application of existing guidance criteria</td>
<td>No – local content policy removed from P&amp;D Code</td>
</tr>
<tr>
<td>December 2019</td>
<td>Zone boundary between Caravan &amp; Tourist Park Zone and Primary Production Zone (refer Zone Map Sal/23)</td>
<td>Development approval has been granted for land division – boundary realignment (3 into 3) – refer DA 361/1584/2019. The land division will alter a cadastral boundary that reflects a present Zone boundary in the Development Plan. The P&amp;D Code shows the Caravan and Tourist Park Zone will be maintained and the Primary Production Zone will transfer to a Rural Zone. The land division will shift the cadastral boundary, hence it is desirable to align with P&amp;D Code Zone boundary with the altered cadastral boundary.</td>
<td>Medium</td>
<td>Shift Zone boundary in P&amp;D Code to align with new cadastre</td>
<td>No</td>
</tr>
</tbody>
</table>
| Jan 2020 | Residential Stormwater systems | Typically residential land division stormwater systems are designed such that the 5yr ARI runoff is contained underground and that flows arising from larger order storm events to be contained within the road reserve (preferably within the road carriageway/kerb) for events up to the 100yr ARI event. Industrial development are typically designed to cater for the 10yr ARI stormwater runoff to be managed underground with safe overland flows for larger events contained within the road reserve (again preferably within the carriageway/kerb) or other formal overland flow path (ie swales).

There is inconsistency in DTS 5.2(b) and DTS/DPF 7.2 (a) on page 2303. Either the reference to non-residential allotments is incorrect and this clause should relate to residential lots or the code sets a higher minimum standard from what Salisbury currently requires and the 20yr ARI storm is to be considered as a pre development measure (rather than the 10yr ARI which would typically be used). Either way there is inconsistency which should be clarified.

In addition to this inconsistency, DTS 5.2 and DTS / DPF 7.2 nominate pre development peak flow rates based on a runoff coefficient of 0.35 for a 30 minute storm. Again, whether these clauses are intended to relate to residential or non- | Refer to comments made in the Description section of this issue. |
residential sites as well as the existing land use will impact whether this is an appropriate pre development assumption. Typically we seek 0.12-0.15 as a pre development run off coefficient for greenfield sites. For a 1 into 5 residential subdivision, the pre development runoff coefficient may realistically be more like 0.2-0.25. For a 1 into 19 residential development, a pre development coefficient of 0.35 is likely appropriate assuming a large land parcel with existing house, shedding and paving. Industrial site development can vary widely depending on the prior site use and surfacing and it’s difficult propose a single one-size-fits-all pre development condition.

DTS / DPF 7.2 specified that new development peak flow time is to match pre development conditions. This will likely result in a need for detention for all developments.

DTS 7.2
Land division creating 5-19 non-residential allotments is accompanied by an approved Stormwater Management Plan and manages up to and including the 100-year ARI flood event (1% AEP) to prevent flooding of buildings and:

(a) maintain
i. a pre-development peak flow rate from the site based upon a 0.35 runoff coefficient for a 18.1% AEP 30 minute storm, and
ii. the stormwater runoff time to peak to match that of the pre-development, or

(b) capture and retain the difference in pre-development runoff volume (based upon a 0.35 runoff coefficient) to post-development runoff volume from the site for a 5-year ARI (18.1% AEP) storm, and

(c) manage site generated stormwater runoff up to and including the 100-year ARI flood event to avoid flooding of buildings.
General comment regarding PO 5.2, 7.2 and 9.1. All clauses have similar wording to the extract below (5.2 and 7.2 relate to 5-19 lots) which is very broad in that they refer to not overloading downstream stormwater systems. There is not necessarily a need to consider future development upstream of the site which may also need to connect to existing systems.

DTF/DPF 9.1 (> 20 residential lots) requires retention of runoff exceeding pre development flows for the 5yr ARI event (ie the water is to be held onsite – not just detained and released at pre development rates). This suggests a need for ponds or onsite infiltration will be required and this may not be Council’s preference. Soakage arrangements within road reserves or green spaces may be able to provide this.

DTS/DPF 9.2 – Similar to the comments for 5.2 and 7.2 above, 9.2 specifies that the 20yr ARI pre development conditions be the limiting factor for post development stormwater discharge whereas typically Salisbury would use 10yr ARI as the
benchmark for non-residential areas. This clause also requires retention of the difference in pre to post development flows for the nominated 30min storm event and this will lead to handover of water storage areas to Council in industrial areas.

DTS 9.3 – The water quality targets for suspended solids and phosphorus are the same as Council’s targets. Our Infrastructure Guidelines has a higher benchmark of 60% for total nitrogen reduction for sites with >60L/sec stormwater discharge (vs 45% in the Code) based on advice from Dameon Roy. This level of water quality treatment requires water to be held onsite and typically treated through a bio-filtration system or grassed swale as proprietary systems alone are not able to achieve this treatment level. There is no target for oil and grease capture. In certain circumstances, the phosphorus and nitrogen (nutrient) reduction may be removed by Council’s wetlands with no additional cost to Council and significant cost savings to developments.
### Concept Plans comparison
**City of Salisbury**

**Detailed Practitioner Review 4**

<table>
<thead>
<tr>
<th></th>
<th><strong>Existing</strong></th>
<th><strong>Proposed</strong></th>
<th><strong>Comments</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>34 Concept Plans</td>
<td>No Concept Plans</td>
<td>Initial review shows correct spatial application, but detailed boundary alignment not undertaken.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Some created as Overlays</td>
<td>Assessment provisions DTS/PO/DPF do not identify criteria. Further reference to TNV in DTS DPF 1.1. is confusing – unclear if it means the mapping information as opposed to written specifications.</td>
</tr>
<tr>
<td>Concept Plan 1</td>
<td></td>
<td>Replaced with Defence Aviation Area Overlay</td>
<td>Comment: Retain</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Outer extent aligns with existing LGA coastal boundary – potential to adjust to new LGA boundary</td>
<td></td>
</tr>
<tr>
<td>Concept Plan 2</td>
<td>Replaced with Aircraft Noise Exposure Overlay</td>
<td>Extent of mapping is set at 20 ANEF, and does not show contour intervals.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Does not identify ANEFs Exposure contours which link to AS 2021 for building construction, including residential, commercial and industrial buildings. Contours must be identified to inform decision making.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Assessment provisions do not identify any criteria.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Unknown if position includes runway extension.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Comment: Retain but improve</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Existing information has not been transferred to the PD Code on a similar basis.</td>
<td></td>
</tr>
</tbody>
</table>
Detailed Practitioner Review 4

Not incorporated

Building Near Airfields Overlay used to incorporate general advice and only for Parafield Airport. No reference to Edinburgh Airfield.

General matters referenced in Building Near Airfields Overlay are lighting, bird attraction, and building design to minimise aircraft noise.

Not all of the matters in the NASF Guidelines A to I are referenced in any detail:
- Noise
- Windshear
- Wildlife strikes
- Wind Turbines obstacles
- Lighting
- Intrusion into protected airspace
- Communications protection
- Helicopter landing sites
- Public Safety Areas

No referrals to any Govt Bodies.

Comments
PO 1.1 refers to Outdoor lighting not a hazard to commercial or military aircraft operations. Overlay does not apply to Edinburgh Defence Airport.

Overlay to apply

No incorporated

Suburban Employment Community Facilities

Various overlays apply, including road widening and Traffic Generating Development, with referrals to Commissioner of Highways.

Important to keep road link for orderly and proper development of the future development of the salt fields.

Retain
**Concept Plans comparison**

**City of Salisbury**

### Detailed Practitioner Review 4

<table>
<thead>
<tr>
<th>Concept Plan 4</th>
<th>Concept Plan 5</th>
<th>Concept Plan 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not incorporated</td>
<td>Not incorporated</td>
<td>Not incorporated</td>
</tr>
<tr>
<td>Broken into Suburban Activity Centre, Suburban Employment, Community Facilities.</td>
<td>Major elements of concept plan developed to allow future guidance of access.</td>
<td>Areas identified as 7.5m and 15m restricted areas are in the PD Code mapping and overlays.</td>
</tr>
<tr>
<td>Traffic generating development overlay does not apply</td>
<td>No need to retain Concept Plan.</td>
<td>The more restricted areas identified in this concept plan after significant work with Dept Defence have not carried across in the layer information</td>
</tr>
<tr>
<td>Total Suburban Activity Centre extent should reflect existing centre extent.</td>
<td></td>
<td>- No structures and development area</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Runway public safety area</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Limited development area</td>
</tr>
<tr>
<td></td>
<td></td>
<td>These areas were critical during the policy formulation and DPTI is advised to liaise with Dept of Defence on this matter.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Details to be retained subject to Dept of Defence advice</td>
</tr>
</tbody>
</table>
## Concept Plans comparison
### City of Salisbury

### Detailed Practitioner Review 4

<table>
<thead>
<tr>
<th>Concept Plan 7</th>
<th>Not incorporated</th>
<th>Was introduced by Minister. Elements such as major road routes are in PD Code as overlay. <strong>No need to retain unless required by Minister</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Concept Plan 8</td>
<td>Not incorporated</td>
<td>Affected area identified differently in PD Code with no transition areas. Was used to identify different housing density, and application of car park fund contribution area. <strong>No need to retain Concept Plan</strong></td>
</tr>
<tr>
<td>Concept Plan 9</td>
<td>Not incorporated. To become Suburban Employment</td>
<td>Partly affected by new Traffic Generating Development Overlay which will result in referral to Commission for Highways <strong>No need to retain</strong></td>
</tr>
</tbody>
</table>
## Concept Plans comparison
City of Salisbury

### Detailed Practitioner Review 4

<table>
<thead>
<tr>
<th>Concept Plan</th>
<th>Description</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concept Plan 10</td>
<td>To become Resource Extraction.</td>
<td>No overlays apply in Consultation Map Viewer. Question is whether the Resource Extraction Protection Area Overlay will be applied Need to reflect buffer policy to existing Residential area.</td>
</tr>
<tr>
<td>Concept Plan 11</td>
<td>Not incorporated.</td>
<td>Access to main roads considered through Traffic Generating Development Overlay Essentially developed, with minor variation to the existing concept plan No need to retain Concept Plan Total Suburban Activity Centre extent should reflect existing centre extent</td>
</tr>
<tr>
<td>Concept Plan 12</td>
<td>Not incorporated.</td>
<td>As per Concept Plan 11 Traffic Generating Development Overlay partially applies to site. Essentially developed, with variations to the existing concept plan No need to retain Concept Plan Extent of centre should reflect existing zone designation</td>
</tr>
<tr>
<td>Concept Plan 13</td>
<td>Concept Plan 14</td>
<td>Concept Plan 15</td>
</tr>
<tr>
<td>----------------</td>
<td>----------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Not incorporated</td>
<td>Not incorporated</td>
<td>Not incorporated</td>
</tr>
<tr>
<td>Broken up into Suburban Activity Centre/ Community Facilities/ Recreation</td>
<td>As per Concept Plan 11</td>
<td>As per Concept Plan 11</td>
</tr>
<tr>
<td>Traffic Generating Development Overlay partially applies to site.</td>
<td>Essentially developed, with minor variations to the existing concept plan</td>
<td>Essentially developed, with variations to the existing concept plan</td>
</tr>
<tr>
<td>No need to retain Concept Plan</td>
<td>Extent of centre should reflect existing zone designation</td>
<td>No Traffic Generating Development Overlay applies.</td>
</tr>
<tr>
<td>Child Centre not separately identified in new Code.</td>
<td></td>
<td>Child Centre not separately identified in new Code.</td>
</tr>
<tr>
<td>No need to retain Concept Plan</td>
<td>Extent of centre should reflect existing zone designation</td>
<td>Extent of centre should reflect existing zone designation</td>
</tr>
<tr>
<td>Concept Plan 16</td>
<td>Concept Plan 17</td>
<td>Concept Plan 18</td>
</tr>
<tr>
<td>----------------</td>
<td>----------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Not incorporated</td>
<td>Not incorporated</td>
<td>Not incorporated</td>
</tr>
<tr>
<td>To become Suburban Activity Centre</td>
<td>To become Open Space Code</td>
<td>To become combination of Suburban Employment, and Open Space Code. Existing Commercial Zone to be included in Suburban Employment</td>
</tr>
<tr>
<td>As per Concept Plan 11</td>
<td>Does not add information or value.</td>
<td>Essentially developed in accordance with concept plan.</td>
</tr>
<tr>
<td>Essentially developed, with variations to the existing concept plan</td>
<td>No need to retain</td>
<td>No need to retain</td>
</tr>
<tr>
<td>Traffic Generating Development Overlay applies.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No need to retain</td>
<td>Extent of centre should reflect existing zone designation</td>
<td></td>
</tr>
</tbody>
</table>

**Concept Plans comparison**

**City of Salisbury**

**Detailed Practitioner Review 4**
### Concept Plans comparison
#### City of Salisbury

**Detailed Practitioner Review 4**

<table>
<thead>
<tr>
<th>Concept Plan</th>
<th>Not incorporated</th>
<th>Developed in accordance with concept</th>
<th>Traffic Generating Development Overlay partially applies.</th>
<th>No need to retain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concept Plan 19</td>
<td>Not incorporated</td>
<td>Developed in accordance with concept</td>
<td>Traffic Generating Development Overlay partially applies.</td>
<td><strong>No need to retain</strong></td>
</tr>
<tr>
<td>Concept Plan 20</td>
<td>Not incorporated</td>
<td>Developed in accordance with concept</td>
<td>Traffic Generating Development Overlay partially applies.</td>
<td><strong>No need to retain</strong></td>
</tr>
<tr>
<td>Concept Plan 21</td>
<td>Not incorporated</td>
<td>Developed in accordance with Concept</td>
<td><strong>No need to retain</strong></td>
<td></td>
</tr>
<tr>
<td>Concept Plan 22</td>
<td>Not incorporated</td>
<td>Developed in accordance with Concept</td>
<td><strong>Required for acoustic protection policies from Edinburgh RAAF Base flight noise treatments for residential development within its extent. Refer to Aviation Practitioner Review</strong></td>
<td><strong>Retain</strong></td>
</tr>
</tbody>
</table>
## Concept Plans comparison
### City of Salisbury

### Detailed Practitioner Review 4

<table>
<thead>
<tr>
<th>Concept Plan 23</th>
<th>Not incorporated</th>
<th>Developed in generally in accordance with Concept</th>
<th>No need to retain</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>To become General Neighbourhood.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Concept Plan 24</th>
<th>Not incorporated.</th>
<th>Policy was created to have acoustic treatments to boundary fencing for residential development protection.</th>
<th>No need to retain</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>To become General Neighbourhood. Employment Zone adjacent.</td>
<td>Still not developed for housing. Considered that new policy will provide same level of control.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Overlays and General Policies to apply.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Concept Plan 25</th>
<th>Not incorporated</th>
<th>Developed area</th>
<th>No need to retain</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Concept Plans comparison</td>
<td>City of Salisbury</td>
<td></td>
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<tr>
<td>-------------------------</td>
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<td></td>
</tr>
<tr>
<td><strong>Detailed Practitioner Review 4</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Concept Plan 26 | Not incorporated | Developed in accordance with concept with minor variations | No need to retain |
| Concept Plan 27 | Not incorporated | Developed in accordance with concept with minor variations | No need to retain |
| Concept Plan 28 | Salisbury District Car Park Fund Area Not incorporated | Need to understand how Fund is to be identified and if it is retained in PDI Act. No information available on retention of Car Park Fund designated areas in the PD Code. | Retention if required in PD Code. |
| Concept Plan 29 | Ingle Farm Car Park Fund Area Not incorporated | Extinguised. | No need to retain |
### Concept Plans comparison

#### City of Salisbury

#### Detailed Practitioner Review 4

<table>
<thead>
<tr>
<th>Concept Plan 30</th>
<th>Kings Junction Airport Building Heights and lighting</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Various blunt incorporations through Airport Building Heights and Building Near Airfields Overlays, and not recognising previous approach to Minister to have identified areas changed</td>
</tr>
<tr>
<td></td>
<td>Compared to Adelaide policy</td>
</tr>
</tbody>
</table>

#### Kings Junction Airport Building Heights and lighting

Significant policy work in DPA to recognise airport policy in the Concept plan has not been recognise which would allow consideration without consultation if complying with requirements.

Proposed to have site within an all development referred area, and separation of lighting intensity and heights has not been incorporated.

Note that Adelaide City individual contours for heights have been identified in draft Code.

Previous approach to Minister to amend policy was not accepted for incorporation through PD Code.

**PD Code to recognise this and make changes as per previous approach.**

Refer to Aviation Detailed Practitioner Review

<table>
<thead>
<tr>
<th>Concept Plan 31</th>
<th>Salisbury Heights</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>To become Suburban Neighbourhood</td>
</tr>
<tr>
<td></td>
<td>Not incorporated</td>
</tr>
</tbody>
</table>

#### Salisbury Heights

Most recent concept plan and of interest to Council in the rezoning process.

Area not developed but some land divisions approved

Overlays will apply for design.

**No need to retain**
## Concept Plans comparison
### City of Salisbury

### Detailed Practitioner Review 4

<table>
<thead>
<tr>
<th>Concept Plan 32</th>
<th>Mawson Lakes Car Park Fund Area</th>
<th>Extinguished</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>No need to retain</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Concept Plan 33</th>
<th>Salisbury City Centre Core and Transition areas</th>
<th>If whole area is identified as UAC, then no need for consideration.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Combined area has been designated as Urban Activity Centre.</td>
<td>No need to retain.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Concept Plan 34</th>
<th>Salisbury City Centre</th>
<th>Need to ensure consistency with current design directions.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Reflects previous design framework for SCC.</td>
<td>Leads to discussion about the separation of areas into different classifications as per most current NCes and Mawson Lakes. Eg should oval be Recreation/OS and school be Community Facility.</td>
</tr>
<tr>
<td></td>
<td>Whole of area is designated Urban Activity Centre (including Salisbury Oval)</td>
<td>Retain</td>
</tr>
</tbody>
</table>

---

[Image of Concept Plan 32]

[Image of Concept Plan 33]

[Image of Concept Plan 34]
Public Notification
Under the PDI Act

Summary Comments

The public notification process under the PDI Act has some notable changes from current practice:

1. There are no third party appeal rights for representors for developments assessed under the Code.
2. The process is more complicated as the public notification process is triggered by:
   a. Much finer grain quantitative judgement (such as site area less than 300m²) rather than current land use triggers.
   b. If the site is adjacent different zone – check spatial application of CoS zones
   c. When more than 4 dwellings / lots are proposed in residential type zones.
   d. Floor area triggers for shops, office, consulting rooms in retail type zones.
3. A development application may be deemed as minor with no unreasonable impact and therefore not require notification. However:
   a. The decision needs to be made within the 5 day verification period – in essence requires an assessment of the proposal. Officers are less likely to make this call in this timeframe during high workloads.
   b. CAP needs to delegate this function to officers. [new procedure / policy required]
4. Council will have to undertake additional tasks including:
   a. Likely to have responsibility to erect the sign on the land and check it during the notification period. [new procedures, equipment, whs considerations]
5. A representation may be made by anyone that views the sign; there is no longer a restriction to people on adjacent land. [council issue]
6. Consultation timeframes have been increased to 15 business days plus 4 days to account for ordinary postage.
   a. This may create situation where applicants are less likely to work outside the DTS as planning consent timeframe is double - 10 days (DTS) or 20 days (PA).
7. CAP is assigned as the relevant authority for all publicly notified applications and will need to consider delegating some matters to staff for efficiency / resourcing (such as where representor does not wish to be heard). [new procedure / policy required & possible resourcing implication]
   a. Implication of Code assigned notifications for the Panel Agenda / timeframes
8. Significant trees notifications appear to have been removed for trees but not the open space zone.

Draft submission

1. Public notification triggers appear to require much more public notification. This may create a situation where applicants are less likely to work outside the DTS as planning consent timeframe is otherwise twice as long. While a development application may be deemed as minor with no unreasonable impact, the decision needs to be made within the 5 day verification period which
Public Notification
Under the PDI Act

in essence requires an assessment of the proposal. Officers are less likely to make this call in this timeframe.

2. It is recommended that public notification triggers should be simplified.
   a. In Residential type zones, remove:
      i. The site of the development is adjacent land to land in a different zone.
      ii. Development involving the creation of four or more additional dwellings.
      iii. Dwellings that are street fronting, notwithstanding not meeting a particular DTS.
   b. In Activity type zones, remove:
      i. Other undefined uses; these zones should encourage a mix of diverse uses / activity. The planning system is too slow to keep up with change.
      ii. Retail fuel outlet, educational establishment, emergency services facility, entertainment venue, hospital, hotel as they should be expected uses. (retain industry)
      iii. Buildings exceeding the maximum building height specified in DTS / DPF 2.2 (min & max building height and setbacks in T&NV).
      iv. shop, office or consulting room in excess of 500m2 in maximum gross leasable floor area for individual tenancies
      v. shop, office or consulting room in excess of 5,500m2 in maximum gross leasable floor area for a single building
   c. Open space Zone:
      i. – possibly requires much more notifiable development – check lists for typical council developments and spatial application of these zone
      ii. Tree damaging activity should be added as a class of development as per other zones.