

7.4 Seaford District Centre Summary of Consultation and Proposed Amendments Report

Approval is sought for the Seaford District Centre Development Plan Amendment for submission to the Minister for Planning seeking agreement pursuant to Section 25 of the Development Act 1993.

This is an update on a previously reported subject, concept or issue.

Director:	Steve Mathewson, Director Finance and Commercial
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Attachments:	1. Summary of Consultation and Proposed Amendments Report (18 pages) 2. The Amendment – Seaford District Centre Development Plan Amendment (16 pages) 3. Copies of public consultation submissions (23 pages)

1. Recommendations

That the Strategic Directions Committee:

- 1. Notes the 'Summary of Consultations and Proposed Amendments' report as attached to the agenda.**
- 2. Approves The Amendment – Seaford District Centre Development Plan Amendment, as attached to the agenda, with the recommended alterations as shown in track changes for submission to the Minister for Planning seeking agreement pursuant to Section 25 of the *Development Act 1993*.**
- 3. Delegates to the Chief Executive Officer, or his nominee, the authority to make any necessary changes to 'The Amendment – Seaford District Centre Development Plan Amendment' in order to obtain the approval of the Minister for Planning, providing the policy intent is not altered and the changes are minor.**
- 4. Notes that should the Strategic Directions Committee approve the Development Plan Amendment for submission to the Minister for Planning and the Development Plan Amendment is approved (or otherwise) by the Minister, council staff will write to the affected land owners and stakeholders who provided a written submission advising of the Minister's decision.**

2. Background

The Seaford District Centre Development Plan Amendment (DPA) has been undertaken in recognition of the significant population growth taking place in this region of the city, the completion of the Activity Centre Review 2009, which identified the need to review Development Plan Policy and the commitment from State Government to extend the train line to Seaford due to open in February 2014, that is expected to trigger new investment interest in this centre.

The Seaford District Centre 20 Year Structure Plan project has been working closely with the Seaford community to develop a community vision that was adopted in

July 2013 seeking Seaford District Centre to be developed to deliver a vibrant Seaford.

The Strategic Directions Committee (the Committee) has considered at length a number of reports on Seaford District Centre across the last two years which are available on **council's website under [Agendas and Minutes](#)**.

- Seaford District Centre Masterplan Community Engagement Strategy, [24 July 2012](#).
- Seaford District Centre Stage 1 Community Engagement Stage 1 Results [29 January 2013](#).
- EM Workshop on the Seaford District Centre Spatial Masterplan components, [29 January 2013](#).
- Seaford District Centre Final Community Engagement report, [23 April 2013](#).
- Seaford District Centre DPA for submission to the Minister for consultation approval, [4 June 2013](#).
- Seaford District Centre DPA Public Hearing Report, [3 December 2013](#).
- Elected Member Briefing held 21 January 2014 to discuss DPA submissions and information raised at the Public Hearing.

3. Financial Implications

There are no direct financial implications as a result of this Seaford District Centre DPA, however it is anticipated that this DPA which aligns policy to the adopted community vision, may serve to facilitate new investment and development across the centre that is anticipated to bring financial benefits to the property owners, broader community and council.

Specific triggers and anticipated order of costs to deliver the council components of the broader structure plan project will be more fully scoped through detailed precinct planning across the centre that will continue to be refined over 2014. This detailed precinct planning will inform the final structure plan to be presented to Council for endorsement, along with a five year implementation plan and long term financial forecasts with anticipated timing and staging triggers to allow clear implementation expectations to be set with the community.

4. Risk and Opportunity

Key risk/opportunity	Details and analysis
DPA is not endorsed or is delayed, putting new investment and development at risk and development not achieving the quality and design expressed in the community vision.	A delay in the resolution of the Seaford District Centre DPA may put at risk investment in the Centre that is anticipated to be triggered as a result of the population growth, opening of the new Seaford Train Station, electrified rail line and duplication of the southern expressway.

5. Discussion

Consultation

Public consultation was held from 26 September 2013 until 22 November 2013 with a public hearing held on 3 December 2013.

Details of the Seaford District Centre DPA, how to make a formal submission and noting that a public meeting may be held were advertised in the following publications as per the Statement Of Intent (SOI):

- The Advertiser on 26 September 2013
- Southern Times Messenger newspaper on 26 September 2013
- South Australian Government Gazette on 26 September 2013.

In addition to this, we wrote directly to stakeholders and affected property owners as contained in the SOI.

Over the last 18 months, there has been significant planning work and community engagement in respect to the future direction and vision for Seaford District Centre. The Development Plan Amendment Draft placed out for consultation was significantly informed by this feedback. As part of the statutory consultation process we also wrote to all stakeholders who have engaged with council to date on the 20 Year Vision and Structure Plan.

The DPA and supporting documents were available on council's website and a hard copy for viewing at each of the Aberfoyle Park, Noarlunga, Willunga, Seaford and Woodcroft council offices.

An information session on the DPA was held with the Seaford Residents Association at their monthly meeting on Wednesday 2 October 2013.

In total three public submissions were received from the following individuals or entities:

- Seaford Property Investments represented by Heynen Planning Consultants
- Walters Family and Leasecorp Pty Ltd represented by Intro Design Pty Ltd
- Lifestyle SA represented by Fairmont Group.

At its meeting on 3 December 2013 Strategic Directions Committee noted and received copies of the Seaford District Centre DPA consultation public submissions.

Key issues raised in the submissions are summarised as follows:

Name	Submission Comments	Council Comments
Walters Family and Leasecorp Pty Ltd	Walters Family and Leasecorp Pty Ltd. support the intent of the draft DPA and the wide range of initiatives espoused within, however an issue within the Desired Character Statement pertaining to building setbacks on Main Street has been identified.	This concern is noted and the word 'occasional' within the Precinct 12 Main Street - Desired Character will be changed to 'opportunity' allowing for flexibility in the design of Main Street.

Name	Submission Comments	Council Comments
Seaford Property Investments Pty Ltd	<p>Seaford Property Investments Pty Ltd, believe that the thrust of the Seaford District Centre DPA will reduce clarity for landowners and investors, confuse the core retail hierarchy of the Seaford Shopping Centre, foster conflict between land uses and reduce investment certainty. Heynen Planning consultants acting on behalf of Seaford Property Investments Pty Ltd seek numerous changes to the DPA including technical and grammatical errors, redrawing of boundaries between the core and transition areas, a whole of centre staging plan based around retail growth, reduction of off street car parking ratios, mapping changes and policy strengthening. Furthermore, it was recommended that the scale of non-residential uses in the Main Street Precinct and Transition Area should be defined by a limit on floor areas to support a varied range of tenancies.</p>	<p>The Seaford District Centre DPA is consistent with the Department of Planning, Transport and Infrastructure's mixed use policy and is delivering the adopted community's vision. The DPA does deliver clarity to landowners and investors by distinguishing where and what types of development exist and are envisaged within the District Centre, with a specific design focus retained for Main Street where no development yet exists.</p> <p>The various grammatical errors and some technical inaccuracies picked up within the submission are acknowledged and will be amended appropriately.</p> <p>The suggested development staging plan over the District Centre and changes to the Core and Transition Areas, in particular the proposed introduction of floor area limits in the Main Street Precinct and Transition Area, are not supported by the Department of Planning, Transport and Infrastructure. Furthermore, quoting 8 November 2013 Seaford District Centre Development Plan Amendment correspondence from the Department of Planning Transport and Infrastructure:</p> <p><i>'The Department advises that it does not support individual retail floor space caps due to its potentially anti-competiveness nature and its inconsistency with the findings of the Productivity Commission's conclusions and Council of Australian Government (COAG) Agenda.'</i></p>

Name	Submission Comments	Council Comments
Fairmont Group	<p>The Fairmont Group, on behalf of Lifestyle SA, albeit not objecting to the Seaford District Centre DPA raised concerns over a mapping inconsistency. The Seaford District Centre Concept Plan boundary incorrectly encompasses the southern section of Lot 779.</p> <p>Revision of concept Onka/13 to reflect the correct boundaries is sought.</p>	<p>This mapping inconsistency is noted and the Concept Plan Map Onka/13 will be amended to reflect the correct boundary.</p>

Planning Policy response to public consultation and public meeting submissions

In summary the following changes resulting from the public submissions are proposed to the Seaford District Centre DPA:

- a) Correction of general grammatical and wording errors.
- b) Amendments to Seaford Policy Area 10 – Desired Character:
 - i. Additional wording to provide greater clarity to policy intent
 - ii. Removal of out-dated terminology.
- c) Amendments to Precinct 1 Main Street Desired Character:
 - i. Additional clarity of terminology for where building setbacks will be supported to Main Street added.
- d) Amendments to Precinct 1 Main Street Principles of Development – Land Use:
 - i. Additional principle of development control to link delivery of any large format retail north of Main Street to also require a component of the development include delivery of an activated Main Street frontage.
 - ii. Additional principle of development control to ensure that open, accessible and easily followed linkages between the Main Street precinct and Core Area are promoted and supported.
 - iii. Removal of out-dated terminology.
- e) Amendments to Precinct 1 Main Street Principles of Development – Form and Character:
 - i. Additional principle of development control to ensure that shop front **advertising along Main Street in managed and maintaining the precinct's** desired character.
- f) Amendments to Concept Plan Onka/13 to correct the north east boundary which incorrectly encompasses lot 779 zone in the Residential zone, re-instatement of a future driveway entrance arrows into the Seaford Shopping Centre.

A detailed summary of each written and verbal submission and a response is provided in the Summary of Consultation and Proposed Amendments (SCPA) report as contained in Attachment 1.

Additional information requested from Council Briefing

At the Council briefing held on 21 January 2014 additional information was requested on the considerations informing the residential policy position proposed in the DPA.

The role of residential within Seaford District Centre is seen as a key land-use that will have a major role to play in activating the centre, assisting to fill in the Centre's vacant spaces, improving centre vibrancy and the negative perception of safety that was raised in the engagement work completed to date. The role of retail, restaurants/cafes, education, recreation, public space improvement and connectivity to adjacent suburbs and transit options will be equally important in contributing towards the successful delivery of a vibrant Seaford District centre across the next 20 years.

The existing development plan residential provisions that apply to all District Centres only allow residential development where it is integrated as part of a mixed use building (shop top apartments). To date, the market has not delivered significant volumes of this form of housing across the city. The new neighbourhood centre at Seaford Meadows is one example of where this form of residential housing has been incorporated, but the centre is also proposed to be further activated by the higher density of detached housing that will be developed immediately adjacent.

Under the policy proposed to be adopted within the Seaford DPA, shop top apartment residential as part of a mixed use building will still be encouraged but we are proposing to introduce more diverse medium to high density residential offerings to take advantage of the centre facilities and the adjacent public transport.

It is anticipated that this policy change will increase the ability for the Centre to attract a residential population in the short to medium term increasing vibrancy and activation outside retail shopping hours and contribute to increasing the sense of safety and security in the Centre.

The policy supports a wider variety of housing types including standalone residential flat buildings, mews style housing, row dwellings/terraces/townhouses predominantly accessed from a rear lane or side street. Additionally, the proposed policy protects the Centre from low density housing which is not considered to be the highest and best use of land in a district centre area through requiring a minimum density of between 40 and 67 dwellings per hectare is achieved for a stand-alone residential building.

Next steps

Should 'the Amendment – Seaford District Centre DPA' (Attachment 2) be approved by the Committee, The Amendment including 'The Summary of Consultation and Proposed Amendments' (SCPA) report will be submitted to the Minister for Planning for consideration.

The Minister may then approve the DPA as submitted by Council, or may propose amendments to the document after further consultation with council on the proposed amendments (Section 25(15) of the *Development Act 1993*).

Assuming the Committee approves the DPA for submission to the Minister for Planning and the DPA is approved (or otherwise) by the Minister, council staff will write to the affected land owners and stakeholders who provided a written **submission advising of the Minister's decision.**

Summary

The DPA has been informed by extensive consultation and a recently adopted Council vision for the Seaford District Centre.

The DPA is based on a 20 year vision for the District Centre, consistent with State Government planning timeframes. Investigations relating to retail growth, taking into consideration growth in other nearby centres, shows that approximately 20,000 square metres of additional floor space will be required in the centre to meet demand over the next 20 years.

Policy changes proposed by the Seaford District Centre DPA include removal of retail floor area caps as advised by the Department of Planning, Transport and Infrastructure, strengthened policy relating to the Main Street Precinct to better guide its future development, increased flexibility in relation to residential development to support achievement of a greater mix of uses to activate and improve safety within the centre.

The DPA delivers clarity to landowners and investors by distinguishing where and what types of development exist and are envisaged within the Centre.

The DPA if approved will provide an up to date and contemporary planning policy framework coinciding with the anticipated significant uplift in activity and interest expected to occur in the centre when the Seaford railway line opens in February 2014.

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City of Onkaparinga

Seaford District Centre Development Plan Amendment

Summary of Consultation and Proposed Amendments (SCPA) Report

Table of Contents

Introduction	1
Consultation.....	1
Consultation Process	1
Public Notification	1
Public and Agency Submissions	1
Public Submissions	1
Agency Submissions	2
Review of Submissions and Public Meeting	2
Additional Matters and Investigations.....	3
Timeframe Report.....	3
CEO's Certification	3
Summary of Recommended Changes to the Amendment following Consultation	3
Attachment A – Summary and Response to Public Submissions	7
Attachment B – Summary and Response to Public Meeting Submissions.....	13
Attachment C – Timeframe Report.....	16
Attachment D – Schedule 4A Certificate.....	17
Attachment E – Schedule 4B Certificate.....	19

Note: Do not delete the Section Breaks within this document as they maintain the header information!
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Introduction

This report is provided in accordance with Section 25(13) of the Development Act 1993 to identify matters raised during the consultation period and any recommended alterations to the amendment. The report also provides details of the consultation process undertaken by Council.

The SCPA Report should be read in conjunction with the consultation version of the DPA. Where relevant, any new matters arising from the consultation process are contained in this Report.

The Amendment reflects the recommendations of Council contained in this Report.

Consultation

Consultation Process

Statutory consultation with agencies and the public was undertaken in accordance with DPA process B and in accordance with Section 25(6) of the Development Act 1993; Regulations 10 and 11 of the Development Regulations 2008; and the agreed Statement of Intent.

The following Local Member(s) of Parliament were consulted on the DPA:

- (a) Hon Leon Bignell MP – State Member for Mawson
- (b) Hon John Hill MP – State Member for Kaurana
- (c) Michael Pengilly MP – State Member for Finniss
- (d) Amanda Rishworth MP – Federal Member for Kingston

No comments were received.

The consultation period ran from 26 September 2013 to 22 November 2013.

Public Notification

Notices were published in the 'The Advertiser' on 26 September 2013, the Government Gazette on 26 September and Southern Times Messenger on 25 September 2013.

The DPA documents were also on display at Council's service centres and libraries and were made available at Aberfoyle Park, Noarlunga, Woodcroft, Seaford and Willunga offices. A copy of the DPA was forwarded to the Department of Planning and Local Government on 26 September 2013.

Public and Agency Submissions

Public Submissions

Three public submissions were received. Key issues raised in the submissions are summarised as follows:

- (a) objection to the Seaford District Centre DPA as it will reduce clarity for landowners and investors, confuse the key function of the Seaford Shopping Centre, fosters conflict between land owners and reduces investment certainty.
- (b) requesting technical and grammatical corrections to the DPA and policy clarification

**City of Onkaparinga
Seaford District Centre Development Plan Amendment
SCPA Report**

- (c) requesting boundary changes, mapping amendments and implementation of a development staging plan
- (d) requesting off street car parking ratio implementation
- (e) requested changes to correct the boundary depicted on Concept Plan Map Onka/13.
- (f) requesting flexibility in providing occasional building setbacks to Main Street.
- (g) requesting driveway access points be re-instated on concept plan removed as part of the previous BDP DPA.

A report on each submission (summary, comments, and action taken in response to each submission) is included in **Attachment A**.

Agency Submissions

Fifteen responses were received from agencies. Key issues raised in the responses are summarised as follows:

- (a) asking that the road name, Griffiths Drive, is correctly depicted on Concept Plan Onka/13
- (b) asking that SAPPL's Noise and Air Emissions Overlay be adopted for Seaford Policy Area 10.
- (c) seeking additional Water Sensitive Urban Design and stormwater management wording into the Desired Character Statement of Seaford Policy Area 10.
- (d) asking that car parking in areas surrounding the Seaford Recreation Centre or associated playing fields is not reduced.
- (e) seeking additional wording 'short-term bicycle parking facilities' is added to the Desired Character Statement
- (f) seeking amendments to the Desired Character Statements of the Seaford Policy Area and Main Street Precinct are made to recognise the risks of on-street parking.
- (g) seeking amendments to typing and grammatical errors
- (h) seeking minor technical and sentence structure changes
- (i) seeking additional instructions be added to the Amendments Instruction Table
- (j) seeking mapping boundaries to Concept Plan Map Onka/13 are clearly distinguished
- (k) asking that the linkages which appear on Concept Plan Map Onka/13 are renamed as walking/cycling links
- (l) asking that Precinct Map Onka/63 be amended to illustrate Precinct 12 Main Street

Review of Submissions and Public Meeting

Copies of all submissions were made available for public review from 25 November 2013 to 3 December 2013 on the Council website and at the Council offices.
Two submitters requested to be heard, and a public meeting was held on 3 December 2013. A copy of the proceedings and a summary of verbal submissions made at the public meeting are included in **Attachment B**.

Additional Matters and Investigations

The following additional matters were identified and the following investigations conducted after the consultation process:

- (a) Review of the proposed Seaford District Centre Development Plan Amendment has identified Precinct 12 Main Street, as requiring policy strengthening in order to deliver the desired character of the precinct.

An additional principle of development control under Precinct 12 Main Street – Land Use is required to ensure that a vibrant, active Main Street is delivered as per the Objectives and Desired character. Two additional principles of development control under Precinct 12 Main Street – Form and Character are required in order to strengthen the design outcomes and ensuring that legibility within the precinct is maintained and advertising within the precinct is managed effectively.

- (b) Review of the proposed Seaford District Centre Development Plan Amendment has identified the recommended amendments as per Attachment E as already being adopted within the Better Development Plan. Hence Attachment E is to be deleted.

Timeframe Report

A summary of the timeframe of the DPA process relative to the agreed Statement of Intent timetable is located at **Attachment C**.

The DPA has not proceeded in accordance with the agreed timetable as Council required additional time to progress a 20 Year Vision & Masterplan community engagement program across Seaford District Centre. The findings from this engagement directly informed the development of the Draft DPA.

CEO's Certification

The consultation process has been conducted and the final amendment prepared in accordance with the requirements of the Act and Regulations as confirmed by the CEO's Certifications provided in **Attachment D** (Schedule 4A Certificate) and **Attachment E** (Schedule 4B Certificate).

Summary of Recommended Changes to the Amendment following Consultation

The following is a summary of the changes recommended to the Amendment following consultation and in response to public submissions and/or agency comments:

- (a) Correction of grammatical, spelling and formatting errors
- (b) Correction of incorrect table references
- (c) Replacement of dated technical terminology
- (d) Replacement of all references to Main Street and, or town square with 'Main Street & Town Square' for clarity
- (e) 'Occasional' replaced with 'opportunity' in the Precinct 12 Main Street Desired Character Statement

City of Onkaparinga
Seaford District Centre Development Plan Amendment
SCPA Report

- (f) Seaford District Centre concept plan boundary depicted on Concept Plan Map Onka/13 to be amended illustrating the correct boundary as depicted in Council's Better Development Plan
- (g) Seaford District Centre Concept Plan Map Onka/13 will be amended to ensure that the road name Griffiths Drive is correctly depicted
- (h) Additional terminology 'short-term bicycle parking facilities' has been included within the Seaford Policy Area 10 Desired Character Statement
- (i) The Amendment Instructions Table will be updated to reflect the correct Development Plan consolidation date from 4 July 2013 to 19 September 2013.
- (j) A new instruction will be added to the Amendments Instructions Table with the insertion of Concept Plan Map Onka/13 and removal of Concept Plan Main Onka/14
- (k) The Amendment Instructions Table – Instruction 1 will be updated to read: "Principle of Development Control 1, excluding forms of development list"
- (l) The Amendments Instruction Table – Instruction 5 method of change will be changed from 'Replace' to 'Delete'
- (m) The Amendments Instruction Table, Map Reference table – will remove Precincts 13-17
- (n) The Amendments Instruction Table – Instruction 8 will be amended to indicate that no re-numbering will be required to accommodate the deletion of Precinct Map Onka/71
- (o) Incorrect formatting of the Main Street Precinct Desired Character Statement and renumbering of following Objectives will be corrected
- (p) All references to Concept Plan will be amended to reflect the Concept Plan title in full – Concept Plan Onka/13 District Centre Zone (Seaford)
- (q) All references to the 'Seaford train Station Interchange' will be amended to 'Train Station/Interchange' to reflect the terminology used on Concept Plan Map Onka/13.
- (r) All references to Main Street Precinct 1 shall be correct to 'Main Street Precinct 12'
- (s) Attachment E, Principle of Development Control 3 will be amended to remove the repeated words 'not prejudice'
- (t) The Concept Plan Map Onka/13 'Concept Plan Area' and 'Core Area' boundaries will be edited to be more defined
- (u) Concept Plan Map Onka/13 legend layout requires amending to be consistent with other existing Concept Plans
- (v) 'Linkages' as identified on Concept Plan Map Onka/13 will be amended to read 'Walking/Cycling Links' and extended out to the nearest road network in all circumstances
- (w) An additional principle of development control included within Precinct 12 Main Street, Land Use - 'Where large format retail is proposed, it should be developed in association with a variety of integrated, outward facing uses to provide reasonable activation of Main Street.'
- (x) An additional principle of development control included within Precinct 12 Main Street, Form and Character – 'The southern side of Main Street should have no fencing that impacts on permeability and amenity within the locality'

City of Onkaparinga
Seaford District Centre Development Plan Amendment
SCPA Report

- (y) An additional principle underpinning of development control included within Precinct 12 Main Street, Form and Character 7 – 'Advertisements attached to buildings should not cover more than 30 per cent of a single wall and, or window face fronting main street.'
- (z) The recommended amendments, as per Attachment E, have already been updated within the Better Development Plan, hence this attachment has been removed and the subsequent following attachments have been renumbered.

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City of Onkaparinga
Seaford District Centre Development Plan Amendment
Attachment A – Summary and Response to Public Submissions

Attachment A – Summary and Response to Public Submissions

Report on each public submission received (including summary, comments and action taken in response)

Sub No.	Name and Address	Submission Summary	Comment	Council Response
1.	Seaford Property Investments Pty. Ltd c/ Heynen Planning Consultants PO BOX 523 KENSINGTON PARK SA 5068	The thrust of the DPA will reduce clarity for landowners and investors, confuse the key function of the Seaford Shopping Centre, lessen the primary role of non-residential uses, foster conflict between residential and non-residential uses and consequently reduce investment certainty.	The Seaford District DPA is consistent with DPTI mixed use policy and is delivering the adopted community's vision. The DPA does deliver clarity to landowners and investors by distinguishing where and what type of development is existing or envisaged within the District Centre, with a specific design focus retained for main street where no development yet exists. The Core and transition areas provide transparency to existing and future residents and investors distinguishing what areas are anticipated to have the greatest intensity of development. Policy is provided that will help address potential conflict between land uses.	No policy change required.
		District Centre Zone PDC 3 requires additional wording to provide clarity as to what constitutes 'not prejudice'.	The District Centre Zone is a city wide zone, given this we cannot make any changes to the zone through the Seaford District Centre Development Plan Amendment process as it would impact on other district centres. This matter will be investigated through Council's upcoming Activity Centre Review.	No policy change required.

City of Onkaparinga
Seaford District Centre Development Plan Amendment
Attachment A — Summary and Response to Public Submissions

	District Centre Zone PDC 9, which discusses the positioning of residential development, is likely to create conflict within the Seaford District Centre.	The District Centre Zone is a city wide zone, given this we cannot make any changes to the zone through the Seaford District Centre Development Plan Amendment process as it would impact on other district centres. Interface issues with residential in mixed use locations within district centres will be investigated through Council's upcoming Activity Centre Review.	No policy change required.
	Seaford Policy Area 10 – Principles of Development Control 1, all references to dwellings types should be followed by the phrase 'with the exception of the Core Area'.	Providing for residential use in centres is a key aspect of creating more vibrant, liveable centres and communities. Both Council and the State Government support this approach in its planning strategies. Potential conflicts between land uses are addressed in policy, and will be further considered through Council's upcoming Activity Centres Review.	No policy change required.
	A new 'Transit Area,' adjacent to the Seaford Train Station/Interchange, is proposed.	Creating a new 'transit area' or transit precinct as suggested, is not supported by the Department of Planning, Transport and Infrastructure.	No policy change required.
	Seaford Policy Area 10 – Objective 2 should have the phrase 'where practicable' added to 'follow 'active street frontages.'	Reference to 'active street frontages' in Seaford Policy Area 10 – Objective 2 is a design element that is not enforced through the policy and allows Council staff to deem where and when active street frontages are appropriate. The suggested additional wording 'where practicable' lacks clarity and creates ambiguity within the Seaford Policy Area 10 objectives. It is considered that there is sufficient flexibility within the policy and development assessment process to address these concerns.	No policy change required.

**City of Onkaparinga
Seaford District Centre Development Plan Amendment
Attachment A — Summary and Response to Public Submissions**

	The need to set a limit of gross leasable floor area is questionable. A staging plan over the Seaford District Centre DPA is proposed. The staging plan reflects the likely introduction and establishment of essential infrastructure and fulfilment of objectives and land uses.	The staging plan as suggested is not supported by the Department of Planning, Transport and Infrastructure. Policy regarding a 'total gross leasable retail floor area (excluding Bulky Goods) in the order of 42,000 square metres by 2031' is a guide not a cap.	No policy change required.
	The DPA Explanatory Statement and Analysis, page 36 incorrectly references 'Table Onka/4,' it should be altered to 'Table Onka/3.'	The reference to Onka/4 (Off street Bicycle parking requirements) will be corrected to Onka/3 (Off street Vehicle parking requirements) through the BDP change register.	No policy change required.
	Seaford Policy Area 10 – Principle of Development Control 5, the terms 'discount department stores and dwellings should be removed.	As acknowledged by the Department of Planning, Transport and Infrastructure, 'discount department stores' is old wording and will be removed from PDC 5 and all other references where it occurs in the Seaford District Centre DPA. With regards to 'dwellings', this wording should be kept as it contributes to the delivery of the desired character for the precinct.	Seaford Policy Area 10 PDC 13 - Removal of all phrases 'discount department stores' from the DPA.
	Seaford Policy Area 10 – Principle of Development Control 13 should be replaced with new wording.	The new Seaford Policy Area 10 – PDC 13 as suggested is not supported as it creates ambiguity and doesn't deliver the Desired Character.	No policy change required.
	The car parking ratio for the Core Area should be reviewed and conceivably reduced given that numerous visitors to the Centre in the future will reside nearby, arrive by public transport or live locally.	The current car parking ratios applicable in the Seaford District Centre were reduced as part of the Better Development Plan review. Council considers these ratios as generous in addressing the desired character of the Seaford District Centre DPA.	No policy change required.

City of Onkaparinga
Seaford District Centre Development Plan Amendment
Attachment A — Summary and Response to Public Submissions

	Removal of previously specific vehicle access linkages from Concept Plan Map Onka/13 should be reinstated separate to pedestrian linkages.	Under the Better Development Plan conversion, existing vehicle entry points and indicative future vehicle entry points were removed from Concept Plan Map Onka/13. The main access point to the Seaford Central Shopping Centre via Main Street will be reinstated and the future vehicle access links off Grand Boulevard will also be reinstated.	Mapping change to Concept Plan Onka/13 is required to reinstate two vehicle access points.
	Land currently zoned core area, located between the north side of Main Street Precinct and Residential Medium Density Zone land, should be rezoned Transition Area to resolve potential interface issues.	This area questioned should be kept within the core area and any interface issues shall be dealt with through the Council wide interface module. The land adjoining is Council owned stormwater drainage basin and any increase in activity of the adjacent land will improve safety and casual surveillance of the area. In addition, despite the land's zoning its use as reserve avoids potential for land use conflict.	No policy change required.
	The south east corner of Main Street Precinct, as illustrated on Onka/63, which includes a portion of the shopping centre, Big W and loading bays, should be removed as it is likely to create conflicts between land uses and the desired character and Objective 1 for the Main Street Precinct will not be achieved within this area.	The Onka/63- Main Street precinct, should be kept in its current form. There is no need to remove the suggested area from the Main Street precinct. Any future development within this location should appropriately address the adjacent Town Square. The desired character and objectives of the Main Street precinct are guides for future development and do not enforce changes to existing structures or land uses.	No policy change required.

**City of Onkaparinga
Seaford District Centre Development Plan Amendment
Attachment A — Summary and Response to Public Submissions**

		Edits should be made to Precinct 1 (sic) Main Street – Principles of Development Control to ensure the role, function and vision for the Town Centre, Main Street and Core areas is articulated. Removal of Community centre, conference facility, place of worship and shop top dwelling is suggested. Inclusion of floor area guides for consulting rooms, offices and shops is also recommended.	To improve clarity throughout the desired character statement, references to main street and or town square will now be referenced consistently as 'main street & town square.' Regarding the removal of 'Places of worship,' 'community centre' and 'shop top dwelling' from PDC 1, the majority of these uses currently exist and therefore will not be removed from the policy. Inclusion of the floor area guides for specific uses is considered inappropriate, as built form matters are addressed through other policy.	All references to 'Main Street' and or 'Town Square' will now be replaced with 'Main Street & Town Square.'
		Precinct 1 (sic) Main Street – Principles of Development Control 9, the phrase 'core retail shopping area' is ambiguous and should be removed.	As suggested, this wording will be removed.	Precinct 12 Main Street PDC 9 -The wording 'core retail shopping area' will be removed.
2.	Walters Family and Leasecorp Pty. Ltd. c/ Intro Design Pty Ltd PO BOX 207 Rundle Mall ADELAIDE SA 5000	Precinct 1 (sic) Main Street – Desired Character, states that 'Buildings will typically be built with a zero setback to Main Street, with the occasional section of the building set back to create weather protect outdoor dining areas.' The provision of building setbacks in specific areas has the potential to create areas of entrapment.	This concern is noted and the word 'occasional' within the Precinct 1 Main Street – Desired Character will be changed to 'opportunity' allowing for flexibility in design.	Precinct 12 Main Street – Desired Character – the word 'occasional' will be replaced with 'opportunity.'
3.	Lifestyle SA c/ John Stimson Fairmont Homes Group Pty. Ltd. PO BOX 179 HINDMARSH SA 5007	There is a mapping inconsistency in the DPA when compared with the current Development Plan. The Concept Plan boundary and the Transition Area incorrectly encompass the southern portion of lot 779. A revised Concept Plan Onka/13 should be prepared.	The Concept Plan Map Onka/13 will be amended to reflect the correct boundary.	Concept Plan Map Onka/13 boundary will be amended to correctly reflect the true boundary as illustrated in the Better Development Plan.

City of Onkaparinga
Seaford District Centre Development Plan Amendment
Attachment B – Summary and Response to Public Meeting Submissions

Attachment B – Summary and Response to Public Meeting Submissions

Two submitters requested to be heard, and therefore a public meeting was held on 3 December 2013.

Sub No.	Name of Respondent	Summary of Verbal Submission/Issues Raised	Council Response
1.	Garth Heynen c/ Seaford Property Investments Pty. Ltd. (5 minute allocation)	<p>Cautioned Council of not implementing this mixed use approach 'at all costs' and that we need to implement a range of elements across planning policy.</p> <p>Clarity for land owners and investors will be reduced as a result of this policy.</p> <p>Council must not confuse the key function of the core retail role of the District Centre by creating conflict with residential uses.</p> <p>The centre needs a hierarchy and the current DPA does not orchestrate a hierarchy of development within the centre.</p> <p>The core area is a core retail area and the transition zone is a core residential area; consistent application of the transition area throughout the DPA is required.</p>	<p>The Seaford District Centre DPA is planning policy that seeks to cater for the growing needs of the centre over the next 20 years by creating a framework that allows for the necessary development of retail, residential, commercial, and industrial and transit infrastructure. The mixed use approach of planning across the centre will improve access and availability to services and improve the viability of employment opportunities.</p> <p>The 'Core Area' policy is being misinterpreted as 'Core Retail' policy, not appreciating fully the mix of uses supported within this area to support not compete with the retail functions that already exist or their future expansion.</p> <p>The core retail role of the District centre does not currently create conflict with existing residential uses.</p> <p>The Transition Area acts to provide a reduction in the intensity of development to act as a buffer between the Core Area and nearby lower density residential zones but still support a mix of uses. The intended uses within the Transition Area include housing and major community facilities such as human services, educational facilities, recreation, religious activities, and open space with small scale office/retail where appropriate. Council is of the view that the extent and application of the Transition Area within the DPA is justifiable and appropriate given the surrounding road network and medium density zoning of immediately adjacent land.</p>

City of Onkaparinga
 Seaford District Centre Development Plan Amendment
 Attachment B – Summary and Response to public Meeting Submissions

2.	<p>Andrew Cohen c/ Seaford Property Investments Pty. Ltd. (5 minute allocation)</p>	<p>Perks Property Investments Pty. Ltd. (PPI) are a major stakeholder within Onkaparinga who have a long term commitment to the success of the Seaford District Centre.</p> <p>Existing retail activity within the Seaford District Centre should be protected to maintain the quality of the retail offering to residents.</p> <p>The concerns being raised are not about competition they are about investor certainty; certainty comes from a clear sensible centre hierarchy and not policy that will lead to 'peppered' retail.</p> <p>PPI want to align their goals with Council's in a sensible framework. Centres need to provide long term sustainability.</p> <p>PPI believe that it is not the existing policy that is constraining growth in the District Centre, it is the retail market.</p> <p>PPI are well advanced in the preparation of a master plan for the centre and require certainty to roll it out.</p> <p>PPI recommend creating transition zones that don't put commercial in existing residential areas.</p> <p>Key message is to not widen the core, but to increase transition zones to manage any impacts on medium density residential and the ability for the retail environment to operate successfully.</p>	<p>The Seaford District Centre DPA has does not explicitly have a role in retail competition or investor certainty within the centre. The DPA does however deliver a framework that encourages growth within the centre and a mix of quality, vibrant retail offerings. The Connor Holmes Seaford & Aldinga District Centre Growth Analysis and Concept Plans 2012 report, undertaken to inform the DPA, identified that over the next 20 years the Seaford District Centre has the capacity to accommodate an additional 19,500sqm of new retail floor space and that the existing main street precinct retail caps are constraining development of this section of the centre. The DPA resolves the Main Street area barrier, but retains this main street area within a separate precinct to that of the existing shopping centre. This ensures that built form and design meets Main Street Principles of street activation and address, providing a different retail experience opportunity for Seaford aligning with the adopted community vision.</p> <p>The Seaford District Centre DPA delivers a hierarchy for retail development within the centre by distinguishing the Core Area as having the most intense retail offering and the Transition Area to accommodate retail of a lesser intensity namely supporting shops and offices.</p> <p>The Seaford Shopping Centre can continue to operate and expand further the mall based shopping centre experience within the core area principles.</p> <p>The core intent of the Transition Area is residential and community facilities. Although commercial opportunities are allowable and encouraged, any proposed development will be assessed on a case by case basis at the time of application and would not support a significant retail facility that would compete with the Seaford Shopping Centre</p>
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**City of Onkaparinga
Seaford District Centre Development Plan Amendment
Attachment B – Summary and Response to Public Meeting Submissions**

3.	Damien Ellis (10 minute allocation)	<p>Supports the contemporary principles of the DPA to set in place a policy approach that will deliver a vibrant activity centre, not just an inwardly facing mall.</p> <p>This DPA change will support an anchor supermarket to the northern side of Main Street that will ensure that the centre achieves cross movement on the street. This is a proven mixed use model that has been used across Adelaide.</p> <p>The independent retail study commissioned by Council not from either of the retail operators identifies that there is existing capacity within the catchment that can service the future expansion wishes of both the north and south retail operators.</p> <p>The DPA has purposely sought to lessen retail priority in the existing centre from its existing 9am-5pm operations to create a more vibrant centre with extended hours.</p> <p>They want to establish a retail catchment distributed around the core area to create a vibrant centre.</p> <p>The issue of extending the transition boundaries to the north of Main Street over Leasecorp/Walters land is a veiled attempt to preclude the large format supermarket.</p> <p>The interface issues between the north side of Main Street and adjoining residential land is a Council controlled issue as Council owns the land zoned residential which is currently used as a drainage basin and public open space.</p> <p>This DPA will directly encourage significant new investment in the centre worth \$30 million dollars. They are ready to lodge on the day of gazettal.</p> <p>The current centre has no connection to the rail station; this DPA will help to support the strengthening of pedestrian links to augment Medium Density housing to entrench 18 hours of activation.</p> <p>Shop-top housing to Main- Street is important.</p>	The support for the Seaford District Centre DPA and significant new investment proposal is noted.
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City of Onkaparinga
 Seaford District Centre Development Plan Amendment
 Attachment C — SCPA Timeframe Report: Process B with consultation approval

Attachment C – Timeframe Report

SCPA Timeframe Report: Process B – with consultation approval

The SOI was agreed by the Minister and Council on "Council to insert date of agreement"

Key steps	Period agreed to in SOI	Actual time taken	Reason for difference (if applicable)
Investigations conducted, DPA prepared and submitted for approval to commence concurrent agency and public consultation	14 weeks	26 April 2012 revised SOI work from this date to 9 July. 63 weeks	The extra timeline taken for this DPA was a direct result of the timing required for Council to progress a 20 Year Vision & Masterplan community engagement program across the centre. The findings from this engagement directly informed the development of the Draft DPA.
DPA prepared for agency and public consultation	2 weeks	2 weeks	
Agency and public consultation period (report on any delays incurred by agencies)	8 weeks	8 weeks	
Public Hearing held, submissions summarised and DPA amended in accordance with Council's assessment of submissions. Summary of Consultations and Proposed Amendments submitted to Minister for approval.	10 weeks	10 weeks	

Attachment D – Schedule 4A Certificate

Schedule 4A—Certificate—section 25(10)

Certificate of chief executive officer that a Development Plan Amendment (DPA) is suitable for purposes of public consultation

"Full name of CEO", as Chief Executive Officer of "Insert name of the Council", certify that the Statement of Investigations, accompanying this DPA, sets out the extent to which the proposed amendment or amendments—

- (a) accord with the Statement of Intent (as agreed between the Council and the Minister under section 25(1) of the Act) and, in particular, all of the items set out in regulation 9 of the Development Regulations 2008; and
- (b) accord with the Planning Strategy, on the basis that each relevant provision of the Planning Strategy that relates to the amendment or amendments has been specifically identified and addressed, including by an assessment of the impacts of each policy reflected in the amendment or amendments against the Planning Strategy, and on the basis that any policy which does not fully or in part accord with the Planning Strategy has been specifically identified and an explanation setting out the reason or reasons for the departure from the Planning Strategy has been included in the Statement of Investigation; and
- (c) accord with the other parts of the Development Plan (being those parts not affected by the amendment or amendments); and
- (d) complement the policies in the Development Plans for adjoining areas; and
- (e) satisfy the other matters (if any) prescribed under section 25(10)(e) of the Development Act 1993.

The following person or persons have provided advice to the Council for the purposes of section 25(4) of the Act:

Marianne Hocking – Development Policy Planner

Date:

.....

Chief Executive Officer

Attachment E – Schedule 4B Certificate

Schedule 4B—Certificate—section 25(14)(b)

Certificate of chief executive officer that an amendment to a Development Plan is suitable for approval

I, "Full name of CEO", as Chief Executive Officer of "Insert name of the Council", certify, in relation to the proposed amendment or amendments to "Insert title of Development Plan" as last consolidated on "Insert current consolidation date", referred to in the report accompanying this certificate—

- (a) that the Council has complied with the requirements of section 25 of the Development Act 1993 and that the amendment or amendments are in a correct and appropriate form; and
- (b) in relation to any alteration to the amendment or amendments recommended by the Council in its report under section 25(13)(a) of the Act, that the amendment or amendments (as altered)—
 - (i) accord with the Planning Strategy, on the basis that each relevant provision of the Planning Strategy that relates to the amendment or amendments has been specifically identified and addressed, including by an assessment of the impacts of each policy reflected in the amendment or amendments against the Planning Strategy, and on the basis that any policy which does not fully or in part accord with the Planning Strategy has been specifically identified and an explanation setting out the reason or reasons for the departure from the Planning Strategy has been included in the report of the Council; and
 - (ii) accord with the other parts of the Development Plan (being those parts not affected by the amendment or amendments); and
 - (iii) complement the policies in the Development Plans for adjoining areas; and
 - (iv) satisfy the other matters (if any) prescribed under section 25(14)(b)(ii) of the Development Act 1993; and
- (c) that the report by the Council sets out a comprehensive statement of the reasons for any failure to complying with any time set for any relevant step under section 25 of the Act; and
- (d) that the following person or persons have provided professional advice to the Council for the purposes of section 25(13)(a) of the Act:

Marianne Hocking – Development Policy Planner

Date:

.....

Chief Executive Officer



Seaford District Centre Development Plan Amendment

The Amendment

City of Onkaparinga

For Approval

a) 1

Seaford District Centre Development Plan Amendment

Approved by the Minister responsible for the administration of the
Development Act 1993 pursuant to Section 25 (18), of the
Development Act 1993.

.....
Minister's Signature

Date.....

Seaford District Centre Development Plan Amendment
City of Onkaparinga
Amendment Instructions Table

Amendment Instructions Table					
Name of Local Government Area: City of Onkaparinga					
Name of Development Plan: City of Onkaparinga Development Plan					
Name of DPA: Seaford District Centre Development Plan Amendment					
<p><i>The following amendment instructions (at the time of drafting) relate to the City of Onkaparinga Development Plan consolidated on 19 September 2013.</i></p> <p><i>Where amendments to this Development Plan have been authorised after the aforementioned consolidation date, consequential changes to the following amendment instructions will be made as necessary to give effect to this amendment.</i></p>					
Amendment Instruction Number	Method of Change	Detail what is to be replaced or deleted or detail where new policy is to be inserted.	Detail what material is to be inserted (if applicable, i.e., use for <u>Insert</u> or <u>Replace</u> methods of change only).	Is Renumbering required (Y/N)	Subsequent Policy cross-references requiring update (Y/N) if yes please specify.
COUNCIL WIDE / GENERAL SECTION PROVISIONS (including figures and illustrations contained in the text)					
Amendments required (Yes/No): Yes					
1.	Delete	General Section Orderly and Sustainable Development, Principle of Development Control 9n		Y	N
2.	Insert	General Section Orderly and Sustainable Development, Principle of Development Control 9m	Contents of Attachment C	Y	N
ZONE AND/OR POLICY AREA AND/OR PRECINCT PROVISIONS (including figures and illustrations contained in the text)					
Amendments required (Yes/No): Yes					
District Centre Zone					
3.	Replace	Principle of Development Control 1, excluding forms of development list	Contents of Attachment A	N	N
4.	Replace	Principle of Development Control 9	Contents of Attachment E	N	N
5.	Replace	Procedural matter Non complying development	Contents of Attachment F	N	N
Seaford Policy Area 10					
6.	Replace	Seaford Policy Area 10	Insert Contents of Attachment B immediately after Policy Area 9	N	N

c) 1

Seaford District Centre Development Plan Amendment
City of Onkaparinga
Amendment Instructions Table

TABLES					
Amendments required (Yes/No): No					
MAPPING (Structure Plans, Overlays, Enlargements, Zone Maps, Policy Area & Precinct Maps)					
Amendments required (Yes/No): Yes					
Map Reference Table					
7.	Delete	Concept Plan Map Onka/14		N	N
8.	Replace	Precinct 12 Core Shopping	Precinct 12 Main Street	N	N
9.	Replace	Concept Plan Map Onka/13 District Centre Access	Seaford District Centre Zone Concept Plan Onka/13	N	N
10.	Delete	Precinct 13 -17		N	N
Map(s)					
11.	Replace	Precinct Map Onka/63	Contents of Attachment D	N	N
12.	Delete	Precinct Map Onka/71		N	N
13.	Replace	Concept Plan Map Onka/13	Contents of Attachment C	N	N
14.	Delete	Concept Plan Map Onka/14		N	N

b) 2

Seaford District Centre Development Plan Amendment
City of Onkaparinga
Attachment A

ATTACHMENT A

- 1 The following forms of development are envisaged in the zone *unless otherwise stated in a policy area or precinct*:

d) 3

ATTACHMENT B

Seaford Policy Area 10

Refer to the *Map Reference Tables* for a list of the maps that relate to this policy area.

OBJECTIVES

- 1 A mixed use policy area accommodating a mix of employment generating land uses and complementary medium to high density residential development in close proximity to the high frequency public transport corridor.
- 2 Well designed and functional mixed use area with a walkable urban form, pedestrian and cyclist friendly streetscapes, and active street frontages that facilitate personal interaction and promote public transport use.
- 3 A mixed use area which comprises a town square (which will function as the central and principal community focus within the district) main street, retail centre, fixed transit stop and high quality open space linked to a safe and convenient network of streets and cycle/pedestrian paths.
- 4 Development that contributes to the desired character of the policy area.
- 5 Precinct 12 Main Street is an entertainment, shopping, commercial and community facility main street supported by medium and high density residential development.
- 6 Precinct 12 Main Street is a development that is largely consistent in height and width, and frames the street at ground and first floor level.
- 7 Precinct 12 Main Street is a visually interesting streetscape with buildings having a high level of fenestration and detailed, and balconies orientated towards the street.
- 8 Precinct 12 Main Street has an intimate public realm with active streets created by buildings designed with frequently repeated frontage form, footpath trading, clear glass and narrow tenancy footprints.
- 9 Precinct 12 Main Street has development that contributes to the desired character of the precinct area.

DESIRED CHARACTER

The district centre at Seaford is intended to function as the focus for community and business activity for people living and working in Seaford and surrounds. As a full service District Centre servicing a growing population it is anticipated that the centre will reach a total gross leasable retail floor area (excluding Bulky Goods) in the order of 42,000 square metres by 2031.

Medium and high density residential development is appropriate in the policy area. Diverse housing forms that cater for a range of household types, ages and life cycle stages, which are adaptable to accommodate non-residential uses either in conjunction with residential or standalone, are also encouraged to take advantage of proximity to nearby transport services and facilities. Housing design will contribute to increasing the sense of safety and security by encouraging overlooking of streets and public spaces. Residential development will predominantly have an inner urban character, with a minimum setback to the primary street, built to side boundaries with vehicle access from a rear laneway or side street.

Development that achieves a convenient, vibrant place that provides high levels of business activity, wide range of retail offerings, integration of education, recreation and community facilities with retail and business services, high levels of pedestrian and public transport access within a network of streets and open spaces

that offer a high level of amenity and safety. Wide footpaths, short term bicycle parking facilities and innovative use of landscaping will help define the street encouraging the development of active land uses at street level along key thoroughfares. Where opportunities exist, consideration should be given to the development of human-scale streets promoting voluntary behavioural change of all street users, enhancing streets as public spaces for social interaction.

The centre will comprise attractive, interesting architecture which defines entries to the centre, landscaped streets and public and private open spaces, cycle/walkways and car parks. It is designed to foster an area with a sense of identity and uniqueness, reflecting the centre's close proximity to the beach and coastal environment, the area's distinctive geology and geomorphology, the culture of the Kurna people, the area's history and heritage, and the character of the area's inhabitants.

In order to minimise the impact of large expanses of at grade car parking, shared parking and consolidating of existing parking where possible is encouraged and the convenience, availability and function of on street parking in the centre will be recognised. The majority of parking will not typically be visible from the principal street or major public spaces.

The policy area will consist of a Core Area and Transition Areas as identified on Concept Plan Map Onka/13.

The form, scale and mix of development will be at its greatest intensity in the Core Area. Land uses located at street level will include a mix of residential, shop, office, tourist accommodation and community services. The mix of uses will cater for the day to day needs of local residents and workers and will be at its greatest intensity closest to the public transit, surrounding the Main Street and Town square. Features and activities that attract people and add vitality to the street, such as display windows, retail shopfronts and outdoor dining areas are desirable.

The Core Area adjoining Commercial Road contains the original retail development in the centre with additional area for expansion to provide for a large and diverse range of retail facilities including a discount department store and bulky good outlets. It also contains a designated Main Street and Town Square that is intended for the development of a mixed retail, business and community precinct with a high level of pedestrian amenity and linkage to all other parts of the policy area, and after-hours activities such as restaurants and cafes.

The Seaford Train Station and the associated car parking facility (also contained within the Core Area) will serve the policy area and the at grade car parking area has the potential to be reconfigured with multi-deck car parking associated with mixed use development in the future. Future development on the Seaford Train Station interchange will either step down or will provide adequate separation or a combination of both, to minimise bulk and scale impacts on immediately adjacent residential housing.

Grand Boulevard has an established character with wide tree lined road corridor with landscaped central median and is a main point of arrival for both residents and visitors to the centre. Buildings not physically linked with the existing shopping centre on the western side of Grand Boulevard should be developed in a manner that is sensitive to the existing residential development promoting high quality built form and building address to the Grand Boulevard frontage, minimum setbacks, locating car parking areas behind buildings, with vehicular access from the rear, minimising new driveway entrances and screening service areas. The Transition Areas will act as a buffer between the Core Area and nearby lower density residential zones. The density and intensity of development will be less than that of the Core Area but will be greater than neighbouring residential zones.

Within the Transition Areas major community facilities including human services, educational facilities, recreation and religious activities, in addition to housing, are intended particularly adjoining areas of open space and pedestrian links traversing the area.

Precinct 12 Main Street

The precinct area will encourage the development of a destination that attracts people to its combination and variety of land uses across extended trading hours. Ground floors will predominantly be used for non-residential and uses that locally attract people to the location such as shops, restaurants and cafes, offices, community facilities and consulting rooms on primary street frontages and buildings addressing the town square (which will be a central gathering point for formal and informal community events and interaction).

**Seaford District Centre Development Plan Amendment
City of Onkaparinga
Attachment B**

Buildings will provide visual interest to the pedestrian; contain frequent and clearly defined pedestrian entries and clear windows to the street.

Buildings will establish a width, rhythm and pattern of facades that support a variety of tenancies with narrow footprints, while building height will increase.

Buildings will typically be built with a zero setback to Main Street and Town Square; with opportunity for the occasional section of the building set back to create weather protected outdoor dining areas, visually interesting building entrances and intimate but active spaces. Along Main Street and Town Square the footpath will be sheltered with verandas, shelters and the like to enhance the pedestrian experience and to support footpath trading to bring activity outside the shopfronts onto the street. Safe, landscaped pedestrian walkways between buildings will encourage permeability to neighbouring streets and enhance the sense of place and identity in the precinct area.

Vehicle access will be grouped, where possible, and from the rear or side of buildings, with the development of lanes for this purpose encouraged.

On the footpath and at the front of the façade of developments, landscaping will be small scale or vertical, such as the use of creepers and green walls and in planter boxes on the footpath. Street trees, high quality paving, lighting and street furniture will be provided between parking spaces on the street and the building façade to improve the pedestrian environment. On-street parking will be encouraged to provide convenience parking for the non-residential uses.

Residential is encouraged either fronting side or rear lanes or as shop top housing above non-residential land uses fronting the street.

Bulky goods showrooms and large format service trade premises are not envisaged on Main Street and Town Square unless smaller scale and fully integrated in a mixed use building.

PRINCIPLES OF DEVELOPMENT CONTROL

Land Use

1 The following forms of development are envisaged in the policy area:

- affordable housing
- aged persons accommodation
- bulky goods outlet within the Core Area
- cafe
- car park
- community centre
- conference facility
- consulting room
- dwelling in a row configuration
- educational establishment
- entertainment venue within the Core Area
- group dwelling
- hotel within the Core Area
- indoor recreation centre
- library
- office
- place of worship
- recreation area
- residential flat building
- restaurant
- row dwelling
- serviced accommodation
- service trade premises within the Core Area
- shop

d) 7

- shop top dwelling
- tourist accommodation

Form and Character

- 2 Development should not be undertaken unless it is consistent with the desired character for the policy area.
- 3 Core Areas, Transition Areas and other identified features should be developed in accordance with Seaford District Centre Zone Concept Plan Onka/13.
- 4 Development should reinforce and encourage the safe and convenient use of the pedestrian links shown on Seaford District Centre Zone Concept Plan Onka/13.
- 5 Development should primarily take the form of:
 - (a) in Core Areas – mixture of retail establishments including, bulky goods, offices, consulting rooms, dwellings, community and human service facilities, small scale service trade premises, bulky goods and other commercial activities that require a high level of exposure to passing traffic on Griffiths Drive, The Parade and Commercial Road
 - (b) in Transition Areas – dwellings, recreation, community, education facilities, open space with supporting shops and offices.
- 6 Transition Areas should be developed to provide a transition between an intense core of development and neighbouring lower intensity development.
- 7 A variety of architectural styles, building materials and colours is appropriate within the policy area and development should be designed to be complementary in respect of their massing, form, siting, design and landscaping and contribute to the achievement of attractive and visually cohesive streetscapes.
- 8 Subject to the requirements of other policies, developments on corner sites should generally abut or be sited close to street frontages and be designed to reinforce the prominence of these sites and sense of entry to the district centre and its key public streets and spaces. Well-designed and proportioned buildings which address both corner frontages with appropriate building forms, architectural elements and landscaping are required.
- 9 Building heights (excluding any rooftop located mechanical plant or equipment) should be consistent with the following parameters:

Designated area	Minimum building height	Maximum building height
Core Area	No minimum height limit	4 storeys and up to 16.5 metres where located adjacent to the Train Station/Interchange or 6 storeys and up to 24.5 metres elsewhere
Transition Area	No minimum height limit	3 storeys and up to 12.5 metres
Precinct 12 Main Street	2 storeys or 6 metres	6 storeys and up to 24.5 metres

- 10 Front fences should be open or where solid no more than 1.2 metres in height to maintain sight lines between buildings and the street and to improve safety through passive surveillance.

Seaford District Centre Development Plan Amendment
City of Onkaparinga
Attachment B

- 11 Buildings should predominantly provide vehicles access via a side street or rear lane access way where possible.
- 12 Side streets and rear lane access ways should be designed to provide space between buildings that reduce building mass, provide opportunity for medium or high residential sites and creates a more interesting and safe public realm.
- 13 Vehicular access and parking for dwellings should be provided at the rear of the dwellings, where practicable, and particularly for development adjoining Grand Boulevard, town square and public open spaces.
- 14 Development of bulky goods showrooms, small scale service trade premises and other commercial activities that require a high level of exposure to passing traffic should:
 - (a) generally be located in the proximity of Commercial Road and Griffiths Drive
 - (b) be located to provide a scale of transition with surrounding streets and more sensitive uses
 - (c) not cause unreasonable overshadowing of adjoining residential uses or public spaces
 - (d) ensure that loading bays, outdoor storage areas and access points for service, delivery and waste collection vehicles are located away from public spaces, streets and living areas
 - (e) provide active, transparent and articulated building edges with clearly defined customer entry points and avoid large expanses of blank walls fronting public areas
 - (f) incorporate design treatments to the form, colour or texture of buildings to add variety, moderate their scale and provide visual interest from a range of distances
 - (g) avoid large expanses of at-grade car parking.

PRECINCT SPECIFIC PROVISIONS

Refer to the *Map Reference Tables* for a list of the maps that relate to the following precinct.

Precinct 12 Main Street

PRINCIPLES OF DEVELOPMENT CONTROL

Land Use

- 15 The following forms of development are envisaged in the precinct:
 - cafe
 - community centre
 - conference facility
 - consulting room
 - dwelling in conjunction with non-residential development
 - office
 - place of worship
 - residential flat building in conjunction with non-residential development
 - restaurant
 - serviced accommodation
 - shop
 - shop top dwelling
 - tourist accommodation
- 16 Development on the ground floors of buildings should be non-residential when fronting the primary street frontage of Main Street and directly abutting the town square.

- 17 The provision of suitably designed structures such as gazebos and shelters, rotundas or pavilions, pergolas, terraces and colonnades is appropriate in the Town Square as shown on Seaford District Centre Zone Concept Plan Onka/13.
- 18 Where large format retail is proposed, it should be developed in association with a variety of integrated, outward facing uses to provide reasonable activation of Main Street.
- 19

Form and Character

- 20 Development should be consistent with the desired character for the precinct.
- 21 Pedestrian shelter and shade should be provided over footpaths through the use of structures such as awnings, canopies and verandas.
- 22 Development along Main Street and Town Square should be designed to achieve active street frontages for passing pedestrians to maximise surveillance and create vibrant public realm by:
 - (a) providing at least 5 metres or 60 per cent of the primary street frontage (whichever is greater) of the ground floor level of buildings as an entry/ foyer or display window to a shop (including a café or restaurant) or other community or commercial use.
 - (b) incorporating outdoor seating areas and pedestrian shelter over footpaths
 - (c) providing well designed and legible entrances, lobbies and shop entrance points at ground level
 - (d) ensuring that vast expanses of blank walls presenting flat surfaces without detailing, openings or activity are avoided
 - (e) using transparent glass, open mesh or transparent security shutters to enable surveillance from public land to the inside of the building at all times of the day and night.
- 23 Advertisements attached to buildings should be visibly permeable where possible and not cover more than 30 per cent of a single wall and, or window face fronting Main Street.
- 24 The finished floor level of the ground floor of buildings should be level with the footpath.
- 25 Individual tenancies of buildings fronting Main Street can provide a secondary entrance at the rear to allow for ease of access from and visibility to the existing at grade car parks with the primary entrance fronting main street or the town square.
- 26 Designated pedestrian/cycle paths should connect Main Street and Town Square to car parking and the Core Area.
- 27 The southern boundary of Precinct 12 Main Street should have no fencing that impacts on permeability and amenity within the locality.
- 28 Building tenancies fronting Main Street and Town Square should be designed for adaptability by providing a minimum ground floor to first floor height of 3.5 metres with a minimum 3.0 metres ceiling height.
- 29 Ground floor land uses should contribute to the creation of a lively and active pedestrian environment along Main Street and Town Square frontages for extended hours and include shops, offices, consulting rooms, community facilities and the like, with residential accommodation above.
- 30 Development should be designed to ensure:
 - (a) car parking should be located at the rear of buildings
 - (b) shared parking areas are established where possible

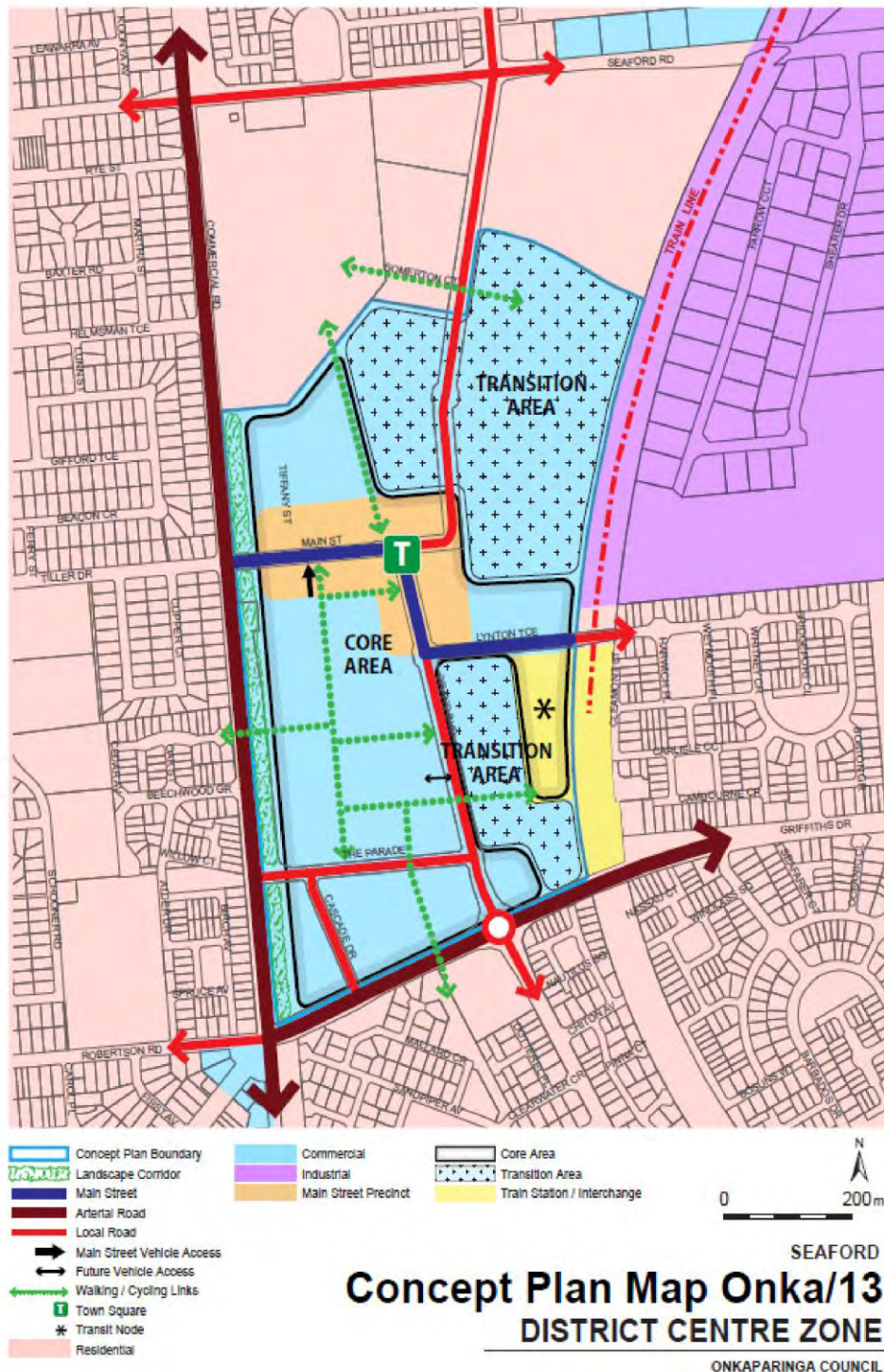
Seaford District Centre Development Plan Amendment
City of Onkaparinga
Attachment B

- (c) servicing areas are located internal to buildings or adjacent service lanes and appropriately screened from public view.

d) 11

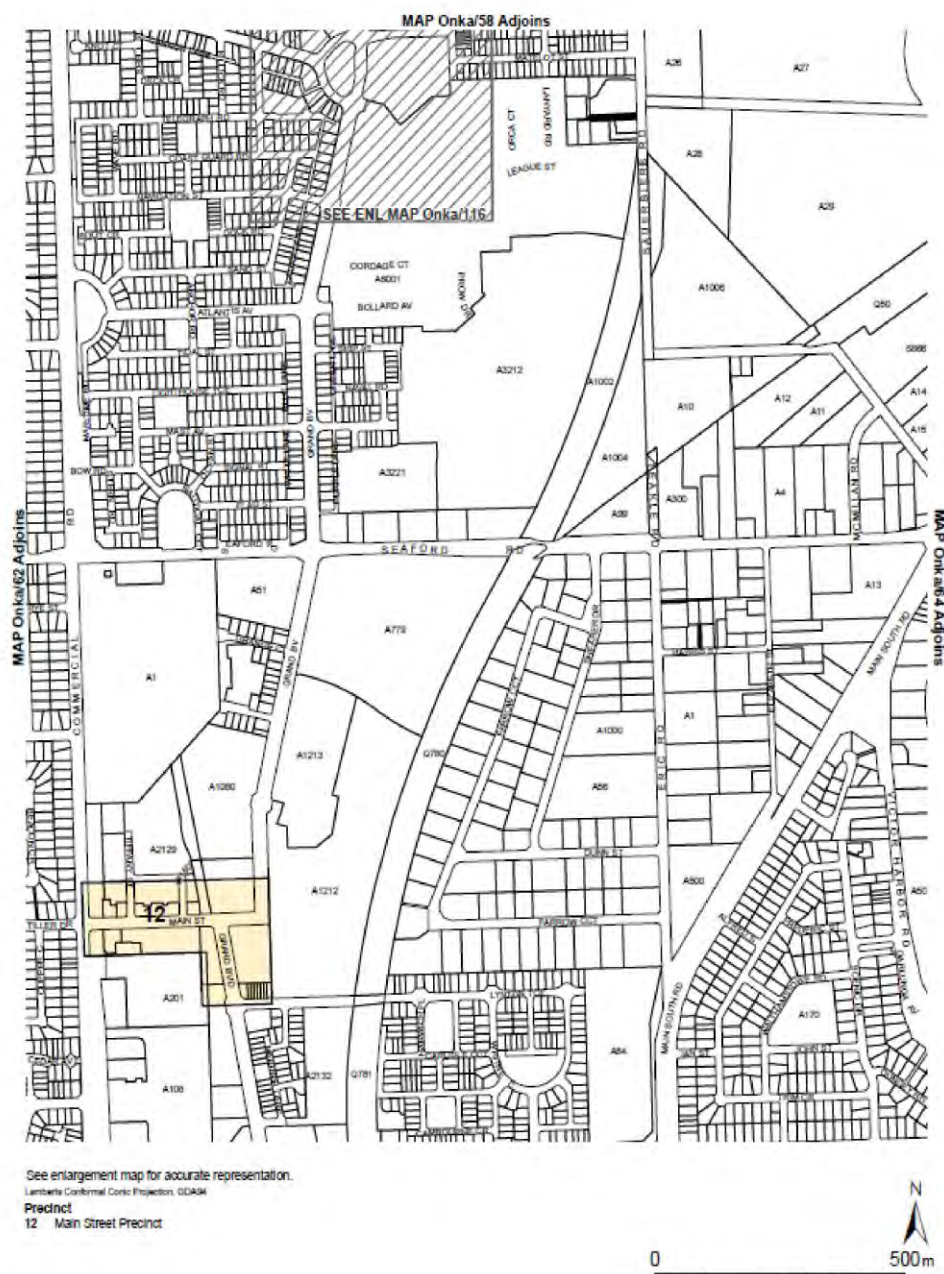
Seaford District Centre Development Plan Amendment
 City of Onkaparinga
 Attachment E

ATTACHMENT C



Seaford District Centre Development Plan Amendment
City of Onkaparinga
Attachment E

ATTACHMENT D



Precinct Map Onka/63

Precinct Boundary

ONKAPARINGA COUNCIL

Seaford District Centre Development Plan Amendment
City of Onkaparinga
Attachment E

ATTACHMENT E

- 9 Dwellings should be located only behind or above non-residential uses on the same allotment, except where otherwise stated in a policy area or precinct.

Seaford District Centre Development Plan Amendment
 City of Onkaparinga
 Attachment E

ATTACHMENT F

Non-complying Development

Development (including building work, a change in the use of land, or division of an allotment) for the following is non-complying:

Form of development	Exceptions
Dwelling	Except where either (a) or (b) applies: (a) located in the Seaford Policy Area 10 (b) it is in conjunction with a non-residential development where located elsewhere in the zone.
Fuel depot	
Horticulture	
Industry	
Major public service depot	
Residential flat building	Except where either (a) or (b) applies: (c) located in the Seaford Policy Area 10 (d) It is in conjunction with a non-residential development where located elsewhere in the zone.
Road transport terminal	
Stock sales yard	
Stock slaughter works	
Waste reception, storage, treatment or disposal	
Wrecking yard	

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22 November 2013

Seaford District Centre DPA
C/- Chief Executive Officer
City of Onkaparinga
PO Box 1
NOARLUNGA CENTRE SA 5168

Dear Sir

RE: Seaford District Centre DPA

I confirm that I act on behalf of Seaford Property Investments Pty Ltd (owner of Lot 201 in DP 62714 and Lot 108 in DP 33443) and the various entities that own Lots 1197, 1199, 1207 in DP 41755, Lot 108 in DP 33443, Lot 104 in DP 32278, Lots 110 and 111 in DP 40297 Seaford, Hundred of Willunga (combined and illustrated in Appendix 1). Heynen Planning Consultants has been requested to review the Seaford District Centre DPA (DPA) and prepare a submission on their behalf.

Summary

The DPA seeks to embrace main street principles and mixed use arrangements for the Seaford District Centre and consequently reduces the hierarchy of uses and activities within the DPA area generally.

Seaford Property Investments Pty Ltd believes that the thrust of the DPA will reduce clarity for landowners and investors, confuse the key function of the Seaford Shopping Centre (the Centre), lessen the primary role of non-residential uses, foster conflict between residential and non-residential uses and consequently reduce investment certainty.

These outcomes are not desirable and accordingly Seaford Property Investments Pty Ltd seeks, on the whole, a more targeted approach to defining and supporting the primary non-residential role and activities of the Centre and reducing the extent of mixed use development within the DPA.

Background Documents

The consultation process conducted by Council culminated in the Seaford District Centre Engagement Report, 25 March 2013, which noted the following key comments from Seaford Property Investments Pty Ltd:

- o retail cap across current centre already exceeded,
- o the delivery of a third key anchor (supermarket) on adjacent land holdings owned by Leasecorp could delay the delivery of the Target DDS which relies on traffic numbers through established supermarkets...
- o flexible consideration of the role of duplication lanes on Commercial Road, either through carparking allocation and/or improved landscaping...
- o masterplan to consider opportunities for PLEC or other funding source to underground power lines on Commercial Road.
- o lack of historical Council support to deliver 3rd party advertisement signs on key road networks of Main South Road to direct people to the centre needs to be revisited as part of broad masterplan.
- o land configuration in south east corner of site, with complexity with Council owned reserve parcel

The comments on the DPA to follow are cognisant of, and seek to provide policy direction, consistent with these previously raised matters.

The Seaford District Centre DPA Explanatory Statement and Analysis, at page 4 states that "the Seaford District Centre DPA will seek to:

- o encourage the centre to develop with high quality urban design with increased development opportunities
- o reduce car parking requirements in areas where large numbers of customers walk and contain a mix of uses and facilities that can share parking, or where adjacent on-street parking can be made available
- o review, consolidate and/or expand the policy area precincts where it can improve viability, amenity or access and/or employment
- o improve the structure of the centre to improve access to services and open space opportunities
- o reduce energy and mains water consumption."

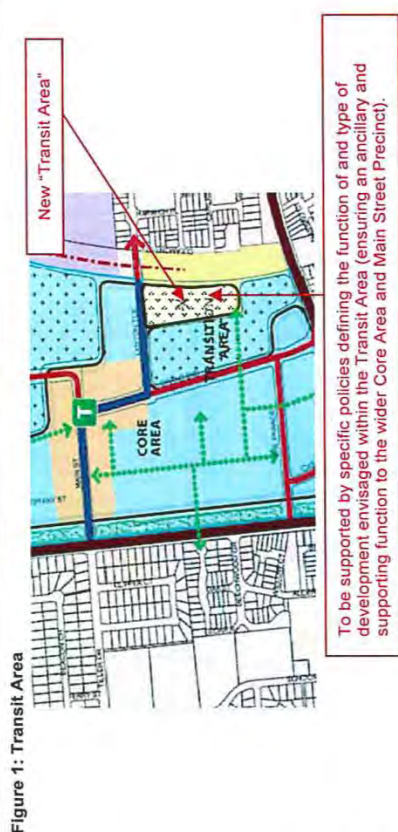
The comments pertaining to the DPA to follow address "gaps" or deficiencies in the policy approach so as to better achieve the stated objectives in the DPA Explanatory Statement and Analysis.

In addition, the Seaford and Aldinga Growth Analysis and Concept Plans, October 2012 incorporates various proposals and recommendations. This submission refers to key elements that appear to have not been included in the eventual DPA.

1(15)

<p>Impact of the DPA on the District Centre</p> <p>DPA provisions which require review and associated explanatory comment.</p>	<p>Alternative Policies or Amendment to the DPA (annotated as text formatted in red or strike-through)</p> <p>Inclusion of the following amendments in the DPA is specifically sought.</p>
<p>District Centre Zone</p> <p>3 Development comprising a variety of medium to high-density residential (including affordable housing) and non-residential uses should be developed only if it does not prejudice the operation of existing or future non-residential activity within the zone.</p> <p>In the first instance the provision is grammatically poor. Furthermore, what constitutes a prejudicial action is not defined. For certainty, the intent of the policy should be defined. For example, the following elements can often create a conflict between uses and the right to operate should be clearly given primacy in the Development Plan by:</p> <ul style="list-style-type: none"> o noting and supporting the operation of loading dock areas; o avoiding encumbrances on service yard operations; o expressing tolerance for impacts from non-residential uses including noise, hours of operation, vehicle movements, waste management etc; and o supporting events and activities that increase the intensity and relevance of the Centre. <p>These elements should be defined as aspects that should be preserved, supported and able to continue without prejudice.</p>	<p>District Centre Zone</p> <p>3 Development comprising a variety of medium to high-density residential uses (including affordable housing) and non-residential uses, with the exception of residential development which would prejudice the operation of existing or future non-residential activity within the zone.</p> <p>(New) 4 Dwellings by way of their design or their proximity to existing or future non-residential activity should not occur if it is likely to create conflicts between these uses associated with noise, vehicle movements, hours of operation, waste management, loading or unloading activities or special events that occur from time to time.</p>
<p>District Centre Zone</p> <p>9 Dwellings should be located only behind or above non-residential uses on the same allotment, except where otherwise stated in a policy area or precinct.</p> <p>The positioning of residential development behind non-residential development will inevitably lead to a residential development "facing" another non-residential development on another allotment with minimal separation. This is likely to create conflict and bring into question the issue of "prejudice".</p> <p>It is also the case that residential development above non-residential development is not compatible (see for example common areas with different functions and risk levels), not financially viable (for example Building Code compliance issues), not desirable from a land title perspective (for example requirements for Torrens Title allotments for commercial development and not Community Titles) and not desired due to investment impediments (for example unwanted complexity as compared to non-residential development in smaller centres). I note that these practical and commercial difficulties are consistent with those listed on Page 52 of the Seaford and Aldinga Growth Analysis and Concept Plans, October 2012 (see below):</p> <p>"Constraints that are common to both district centres are identified as follows:</p> <ul style="list-style-type: none"> o limited demand for TOD-style development in outer suburban areas from both developers and consumers, particularly in lower-value environments that cannot sustain the higher construction costs of medium and higher density housing; o commercial viability; o fragmented ownership; and o existing investment in development." <p>Typically residential development above non-residential development in a District Centre environment is an impediment to investment, and to promote such outcomes is counterintuitive to the key function and the potential growth of the District Centre Zone.</p>	

<p>District Centre Zone</p> <p>Non-complying Development Dwelling Except where either (a) or (b) applies: (a) located in the Seaford Policy Area 10 (b) it is in conjunction with a non-residential development where located elsewhere in the zone.</p> <p>Residential flat building Except where either (a) or (b) applies: (c) located in the Seaford Policy Area 10 (d) it is in conjunction with a non-residential development where located elsewhere in the zone.</p> <p>Grammatically, the residential flat building dot points should be (a) and (b) and not (c) and (d). More importantly, the proposed non-complying trigger is a "policy shift" from the 4 July 2013 consolidation that lists all dwellings and residential flat buildings as non-complying "except where in conjunction with a non-residential development". The softening of the policy to allow dwellings anywhere within the Seaford Policy Area 10 is highly undesirable.</p> <p>Consistent with the clear focus sought for the Centre, envisaged forms of development as outlined by PDC 1 should be amended to limit residential development to appropriate areas (i.e. not the Core Area).</p> <p>The exclusion of residential uses from the Core Area is entirely consistent with the Seaford and Aidinga Growth Analysis and Concept Plans, October 2012 report which states at page 72 (Conclusions):</p> <p>"...the essential nature of development within the centres will be commercial in nature, with residential an important yet secondary use."</p> <p>The primary area for residential development should be located within the Transition Areas and the Main Street Precinct and not the Core Area.</p>	<p>Seaford Policy Area 10 – Principles of Development Control</p> <p>1 The following forms of development are envisaged in the policy area:</p> <ul style="list-style-type: none"> • affordable housing, with the exception of the Core Area • aged persons accommodation, with the exception of the Core Area • bulky goods outlet within the Core Area • cafe • car park • community centre • conference facility • consulting room • dwelling in a row configuration, with the exception of the Core Area • educational establishment • entertainment venue within the Core Area • group dwelling, with the exception of the Core Area • hotel within the Core Area • indoor recreation centre • library • office • place of worship • recreation area • residential flat building, with the exception of the Core Area • restaurant • row dwelling, with the exception of the Core Area • serviced accommodation, with the exception of the Core Area • service trade premises within the Core Area • shop • shop top dwelling, with the exception of the Core Area • tourist accommodation • shop top dwelling, with the exception of the Core Area • tourist accommodation
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Seaford Policy Area 10 - Objectives

1. A mixed use policy area accommodating a mix of employment generating land uses and complementary medium to high density residential development in close proximity to the high frequency public transport corridor.

The high density residential development referred to in Objective 10 should be limited to land within the "transition area" and the Mains Street area illustrated on Concept Plan Onka/13. That is, given inevitable "prejudice" issues, the transition and Main Street areas are the only sensible location.

Consistent with the concerns regarding the diminution of the focus of the Core Area, the Seaford Train Station (transit node) should be removed from the Core Area and be defined as a Transit Area with specific policy provisions.

Seaford Policy Area 10 – Desired Character

The Seaford Train Station and the associated car parking facility (also contained within the Core Area) will serve the policy area and the at grade car parking area has the potential to be reconfigured with multi-deck car parking associated with mixed use development in the future.

The primary function of the suggested Transit Area should be articulated, while the removal of this node from the Core Area will ensure that the potential to undertake retail development is circumvented (thereby reinforcing the primacy of the Core Area).

As per Appendix 3 (Current Development Plan Precincts (consolidation 4 July 2013)) the transit node is currently supported by a specific Transport Interchange Precinct, there is no justification to remove this status in the proposed DPA.

Furthermore, the Seaford and Aldinga Growth Analysis and Concept Plans, October 2012 report which states at page 35 (Approved/Mooted Development Concepts) states that:

"...the at grade car park is potentially a lost opportunity and in the longer term consideration should be given to encouraging additional uses which may assist in strengthening the link and connection between the centre and the station..."

The DPA does not address this comment a specific Transit Area and clear policy guidance will support this outcome. The use of the Core Area policies will not "strengthen the link" with the Centre.

Seaford Policy Area 10 - Objectives

2. Well designed and functional mixed use area with a walkable urban form, pedestrian and cyclist friendly streetscapes, and active street frontages that facilitate personal interaction and promote public transport use.

The Centre cannot provide active street frontages on all four sides of the land ownership. This is an unreasonable and highly problematic expectation. Objective 2 must be tempered in recognition of the practical reality that the Centre requires service areas, delivery areas, and other ancillary areas not accessed by the general public, which in turn requires 'non-active' street frontages.

Seaford Policy Area 10 - Objectives

2. Well designed and functional mixed use area with a walkable urban form, pedestrian and cyclist friendly streetscapes, and active street frontages, where practicable, that facilitate personal interaction and promote public transport use.

Seaford Policy Area 10 – Desired Character
 As a full service District Centre servicing a growing population it is anticipated that the centre will reach a total gross leasable retail floor area (excluding Bulky Goods) in the order of 42,000 square metres by 2031.

The need to set a limit of gross leasable floor area is questionable. Firstly, various types of non-retail development is not included in the quantitative measure, secondly, the ultimate gross leasable area will be balanced and tempered by practical issues such as the supply of car parking, and finally it is a very difficult provision to measure and apply during the development assessment process taking into account the current and potential variety of land uses and disparate ownership of land.

Furthermore, a gross leasable retail floor area figure has the potential to create a "first in basis" of developing retail activities, leaving other forms of development required to create a mix of uses to follow as a second preference (given that no floor area limit is set). In my opinion, it should not be the role of the policies to artificially augment the capacity of the retail and commercial market.

I also note that the Seaford and Aldinga Growth Analysis and Concept Plans, October 2012 report which states at page 66 seeks a "retail capacity of the centre as a guide rather than a cap". The experience of Seaford Property Investments Pty Ltd is that the Council has previously considered this quantitative criteria in the current Development Plan as more akin to a fixed standard. Given this experience and the advice of Connor Holmes the policy preference is to outline stages for the development of the Core Area and Main Street Area to reflect the likely introduction and establishment of essential infrastructure, the Seaford Train Station, the fulfilment of Transition Area objectives and land uses, and the realisation of the full potential of the existing Centre with respect to the provision of goods and services.

Seaford Policy Area 10 – Desired Character¹

In order to minimise the impact of large expanses of at grade car parking, shared parking and consolidating of existing parking where possible is encouraged and the convenience, availability and function of on street parking in the centre will be recognised.

The DPA Explanatory Statement and Analysis states at page 36 the following:

"Where formal arrangements can be put in place for the sharing of car parking or a significant area of on-street convenience parking is provided immediately adjacent to the land use there should be an opportunity for a reduction of the car parking rates outlined in the Development Plan. This approach is preferred to any reduction on the minimum car parking rates outlined in Table Onka/4 which apply to all zones within the Development Plan rather than only the District Centre."

The DPA does not however articulate what "formal arrangements" are anticipated and the circumstances in which car parking ratios are more flexible or the means of determining "significant areas" of convenient on street parking.

To support sharing of car parks, it is suggested that new car parking ratios should be incorporated into the Development Plan for mixed use development cognisant of the general access to car parks for visitor parking and opportunity for after business hours parking.

¹ The comments regarding the sharing of car parking are general in nature as it has been assumed that the removal of dwellings as an envisaged use from the Core Area is supportable.

Figure 2: Staging Plan



The reference to Table Onka/4 should be altered to Table Onka/3.

The car parking ratio for the Core Area should also be reviewed and conceivably reduced given that numerous visitors to the Centre in the future will either reside nearby, or arrive by convenient public transport, or be attending the locality due to other non-retail type activities available within the precinct.

Table Onka/3 and/or General Section Principles of Development Control should be amended to clearly nominate when opportunities for reduced car parking supply associated with a formal arrangement and significant on-street car parking can occur, for example:

Table Onka/3 – Off Street Vehicle Parking Requirements

(New) 8 A discount factor of up to 20 per cent will be considered where any land use is proposed within the Core Area of Seaford Policy Area 10 and:

- the majority of existing and proposed off-street car parking supply is shared between different premises within a centre; or
- pre-existing or contractual agreements exist that formalise shared car parking; or
- on-street car parking is available adjoining the street frontage of the centre.

Seaford Policy Area 10 – Desired Character

The Core Area adjoining Commercial Road contains the original retail development in the centre with additional area for expansion to provide for a large and diverse range of retail facilities including a discount department store and bulky good outlets.

Given that the "envisaged" land uses listed within PDC 1 generically refers to shops and not specifically to discount department stores (unlike bulky goods outlet) the reference to a discount department store in the Desired Character should be removed. Furthermore, the term discount department store is not defined in Schedule 1 of the Development Regulations (unlike bulky goods outlet) and should be removed so as to avoid confusion. It is also the case that generic terms for a discount department store may change over time due to market trends and therefore has the potential to become outdated and meaningless. Furthermore, the term "adjoining" Commercial Road in the Desired Character should be altered to "adjacent" so as to provide broader scope for retail development.

Seaford Policy Area 10 – Desired Character

Buildings not physically linked with the existing shopping centre on the western side of Grand Boulevard should be developed in a manner that is sensitive to the existing residential development promoting high quality built form and building address to the Grand Boulevard frontage, minimum setbacks, locating car parking areas behind buildings, with vehicular access from the rear, minimising new driveway entrances and screening service areas.

The Desired Character fails to recognise the:

- o servicing requirements for Big W which influence pedestrian movements on Grand Boulevard;
- o practical difficulty of providing active frontages along Grand Boulevard while maintaining the function of existing retail and non-residential buildings and tenancies;
- o longstanding and future commercial obligations required for existing tenants which demand directly accessible car parks;
- o commercial benefit of car parks which are clearly visible and accessible for customers;
- o reality that, across the board, designated District Centres cannot financially sustain street fronting tenancies; and
- o undesirable isolation that would be created by buildings functioning separately from the existing District Centre buildings.

It is also the case that the Desired Character does not provide any guidance for buildings that "are physically linked" with the existing shopping centre. In practice this is and will be the most commercially viable type of development and the DPA should articulate the relevant anticipated policy outcomes in this respect (noting that no building can provide an active street frontage on all sides as previously discussed in relation to Seaford policy Area 10 – Objective 2).

Seaford Policy Area 10 – Principles of Development Control

5 Development should primarily take the form of:

- (a) in Core Areas – mixture of retail establishments including ~~discount department stores~~, bulky goods, offices, consulting rooms, ~~dwellings~~, community and human service facilities, small scale service trade premises, bulky goods and other commercial activities that require a high level of exposure to passing traffic on Griffiths Drive, The Parade and Commercial Road.
- (b) in Transition Areas – dwellings, recreation, community, education facilities, open space with supporting shops and offices.

Seaford Policy Area 10 – Desired Character

~~4.3 Vehicular access and parking for dwellings should be provided at the rear of the dwellings, where practicable, and particularly for development adjoining Grand Boulevard, town square and public open spaces.~~

Replace with

13. Vehicular access and parking for development adjoining the town square and public open spaces should be provided at the rear of buildings, where practicable, except for non-residential development adjoining Grand Boulevard.

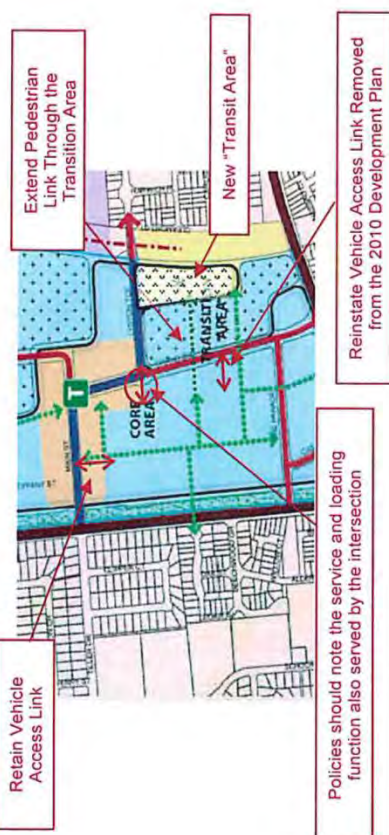
Seaford Policy Area 10 – Principles of Development Control

14 Development of bulky goods showrooms, small scale service trade premises and other commercial activities that require a high level of exposure to passing traffic should:

- (a) generally be located in the proximity of Commercial Road and Griffiths Drive.
- (b) be located to provide a scale of transition with surrounding streets and more sensitive uses;
- (c) not cause unreasonable overshadowing of adjoining residential uses or public spaces;
- (d) ensure, ~~where practicable~~, that loading bays, outdoor storage areas and access points for service, delivery and waste collection vehicles are located away from public spaces, streets and living areas;
- (e) provide ~~active, transparent and~~ articulated building edges with clearly defined customer entry points and avoid large expanses of blank walls fronting public areas;
- (f) incorporate design treatments to the form, colour or texture of buildings to add variety, moderate their scale and provide visual interest from a range of distances; and
- (g) avoid large expanses of at-grade car parking.

Provide policy guidance for buildings that "are physically linked" with the existing shopping centre.

Figure 3: Vehicle Linkages



Seaford Policy Area 10 – Principles of Development Control

- 3 Core Areas, Transition Areas and other identified features should be developed in accordance with Concept Plan Onka 13.
- 4 Development should reinforce and encourage the safe and convenient use of the pedestrian links shown on Concept Plan Onka/13.

The Concept Plan Onka/13 (note the inconsistent use of the "i" between PDC 3 and 4) deletes a previously specific vehicle access from Main Street that services the existing Centre by referring to a "linkage". This does not provide certainty for the Centre operations and functional requirements. The Concept Plan Onka/13 should separate pedestrian linkages and vehicular linkages, rather than generically referring to these aspects as "one in the same".

Appendix 4 (Certificate of Title - Lot 201 DP 62714) also clearly confirms that the vehicle access link coincides with the legally registered Rights of Way afforded to Woolworths Limited. Accordingly, its function will remain and it should be supported and reinforced by the DPA.

Furthermore, Concept Plan Onka/13 seeks that the Main Street intersection of Grand Boulevard and Lynton Terrace should become a main route for vehicle movements, while at the same time failing to recognise the service area and delivery function being conducted through the same intersection on a daily basis. No reconciliation of the different functions served by the intersection is made by the DPA, despite the preference of "safe and convenient use" being provided.

Seaford Policy Area 10 – Principles of Development Control

- 9 Building heights (excluding any rooftop located mechanical plant or equipment) should be consistent with the following parameters:

Designated area	Minimum building height	Maximum building height
Core Area	No minimum height limit	4 storeys and up to 18.5 metres where located adjacent to the Seaford Train Interchange or 6 storeys and up to 24.5 metres elsewhere
Transition Area	No minimum height limit	3 storeys and up to 12.5 metres
Main Street Precinct	2 storeys or 6 metres	6 storeys and up to 24.5 metres

The building height of 4 storeys adjacent to the Seaford Train Interchange is supported, however the wording should be altered such that the Transit Area referred to previously is defined separately (i.e. as a consequential amendment).

In relation to the Transition Area it is noted that (see PDC 6) that these areas should be developed to provide a "transition between an intense core of development and neighbouring lower intensity development". The portion of the Core Area circled overlies directly abuts land in the Residential Zone (Policy Area 40), yet by virtue of PDC 9 could accommodate buildings up to 6 storeys in height directly abutting conventional residential development. This is undesirable and inconsistent with PDC 6. The need for a transition of built form and intensity of uses is further reinforced by the following statement at page 33 of the DPA Explanatory Statement and Analysis:

"With the approval and gazettal of the Better Development Plan Zones and General Amendments DPA the Seaford Centre will be bounded by Medium Density Policy Area 40 immediately to the north (south of Seaford Road) to the east, to the south and to the west. This intensification of the adjacent residential areas will contribute to demand for services within the centre."

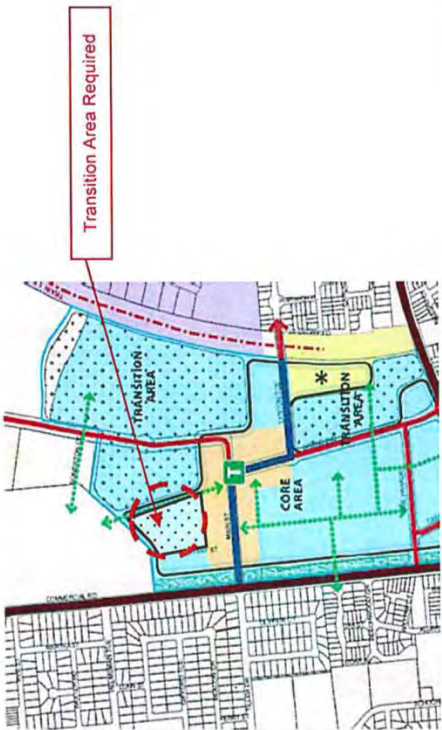
It is also the case that Seaford and Aldinga Growth Analysis and Concept Plans, October 2012 report

references at the pages 52, 53, 58 and 59 and by way of Figures 8.1 and 9.2 "sleeved residential development" and the Seaford Centre Community Workshop Notes 30.11.11 "Housing fronting the park" directly adjoining the suggested Core Area.

Accordingly, the area circled below should be converted to a Transition Area to avoid confusion with and to avoid undermining the Desired Character and intended spatial and physical relationship with adjoining residential land.



Figure 4: New Transition Area



Precinct 1 Main Street – Objectives

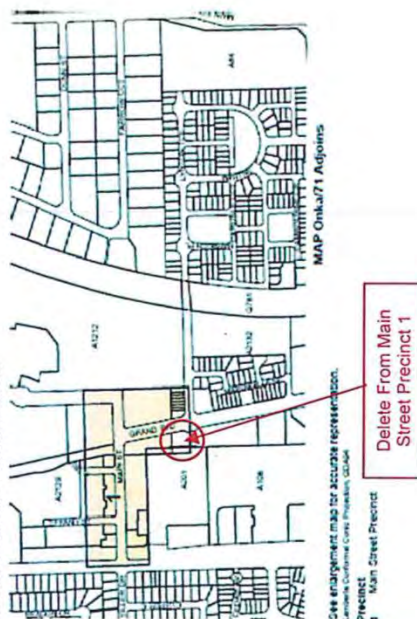
- 1 An entertainment, shopping, commercial and community facility main street supported by medium and high density residential development.
- 4 An intimate public realm with active streets created by buildings designed with frequently repeated frontage form, footpath trading, clear glass and narrow tenancy footprints

Precinct 1 Main Street – Desired Character

The precinct area will encourage the development of a destination that attracts people to its combination and variety of land uses across extended trading hours. Ground floors will predominantly be used for nonresidential and uses that locally attract people to the location such as shops, restaurants and cafes, offices, community facilities and consulting rooms on primary street frontages and buildings addressing the town square (which will be a central gathering point for formal and informal community events and interaction).

The Main Street Precinct as illustrated on Onkal/63 includes a portion of the shopping centre (circled below) which incorporates the Big W loading bays; short term storage areas; and access points for service, delivery and waste collection vehicles. The area also includes car parking for the Centre.

Figure 5: Main Street Precinct 1 Modification



The Desired Character and Objective 1 for the Main Street Precinct have not and will not be achieved within this area. Furthermore, it is likely that conflict between residential and non-residential land uses will transpire. Accordingly, the affected land should be removed from the Main Street Precinct 1 as illustrated on Precinct Map Onka/63.

Precinct 1 Main Street – Desired Character²

Bulky goods showrooms and large format service trade premises are not envisaged on Main Street and fronting the Town Square unless smaller scale and fully integrated in a mixed use building.

Precinct 1 Main Street – Principles of Development Control

3 The provision of suitably designed structures such as gazebos and shelters, rotundas or pavilions, pergolas, terraces and colonnades is appropriate in the Town Square as shown on Concept Plan Map Onka/13.

6 Development along Main Street and the Town Square should be designed to achieve active street frontages for passing pedestrians to maximise surveillance and create vibrant public by...

10 Building tenancies fronting Main Street and the Town Square should be designed for adaptability by providing a minimum ground floor to first floor height of 3.5 metres with a minimum 3.0 metres ceiling height.

11 Ground floor land uses should contribute to the creation of a lively and active pedestrian environment along Main Street and Town Square frontages for extended hours and include shops, offices, consulting rooms, community facilities and the like, with residential accommodation above.

The above policies describe various uses and built form outcomes, however it is evident that a clear vision for the Town Centre is not articulated in the Desired Character statement.

² The comments regarding the Main Street are provided on the basis that the Centre land is excised from Precinct 1.

The role, function and vision for the Town Centre should be clearly described, and the key policy differences between the Town Centre, Main Street, Core, Transition and Transit (as suggested) Areas should be articulated.

For example, the DPA Explanatory Statement and Analysis, at page 17 describes the town square as being "transformed into a vibrant community hub, always full of activity and well-equipped to host a range of events that foster a strong sense of community and belonging. Whether people arrive by high speed electric train, by car, or on foot or bike via the shared use Coast to Vines Rail Trail, the area will be easily accessible and serve as a gateway through which locals and visitors can explore the region's spectacular coastline and the vineyards of McLaren Vale."

This vision could be altered and included in the Desired Character statement, while differentiation in the scale of non-residential uses in the Main Street and Transition Area should also be defined and supported by a limit on floor area to support a varied tenancy range (so as to contrast with the Core Area). The Desired Character statement should also remove uses such as a community centre, place of worship and conference facility from the Main Street Precinct 1 given that they are also envisaged in (and better suited to) the Transition Area.

In this regard all of the uses envisaged by the Main Street are referred to by the Core Area (see below):

- cafe
- community centre
- conference facility
- consulting room
- dwelling in conjunction with non-residential development
- office
- place of worship
- residential flat building in conjunction with non-residential development
- restaurant
- serviced accommodation
- shop
- shop top dwelling
- tourist accommodation

Assuming the Main Street is to have a unique "feel" created by way of the built form, it follows that the envisaged land uses should also differentiate from the Core Area in some manner.

Furthermore, the Seaford and Aldinga Growth Analysis and Concept Plans, October 2012 report at page 35 indicates that the Main Street should include "smaller boutique retail stores or high quality... spaces" and at page 52 the encouragement of "many more small and medium size shops, offices and consulting rooms in the Main Street..."

The scale and nature of development have not been, and should be, articulated in the Main Street policies in the DPA.

Precinct 1 Main Street – Principles of Development Control

9 Designated pedestrian/cycle paths should connect Main Street and the Town Square to carparking and the core retail shopping area

The term core retail shopping area is ambiguous. It is presumed that the reference relates to the Core Area and consequently use of this unique term is undesirable.

General Comments about the DPA

The following observations are made with respect to the DPA more generally:

- o the Main Street precinct refers to "shop top housing" and while this concept may be broadly understood it is nonetheless vague. For example, it may limit "office top housing" or other forms of dwellings above non-residential development;
- o the concept of "shop top housing" should be clearly defined;
- o shop top housing should be supported by clear design guidelines that are specific to this form of accommodation and not conventional residential criteria (i.e. communal open space, noise abatement, shared car parking and waste management arrangement, overlooking and privacy, encroachments of footpaths and other public land are aspects that each require unique policy guidance); and
- o Concept Plan Onka/13 illustrates a "landscape corridor" with no reference in the proposed policies to its role, function and appearance.

Summary

The DPA responds to the impending population, infrastructure and transportation related triggers affecting the District Centre Zone. This submission however, respectfully suggests that the policy approach artificially and unnecessarily progresses towards a complete mixed use environment which will undermine the continued expansion of the Centre. In this regard the Core Area should be treated in a manner that is distinct from, but interrelated with, the Transition Area, the Main Street Precinct and the suggested Transit Area (see Appendix 2).

Precinct 1 Main Street – Principles of Development Control

1 The following forms of development are envisaged in the precinct:

- cafe
- community centre
- conference facility
- small (250 m2) to medium (600 m2) size consulting room
- dwelling in conjunction with non-residential development
- small (250 m2) to medium (600 m2) size office
- place-of-worship
- residential flat building in conjunction with non-residential development
- restaurant
- serviced accommodation
- small (250 m2) to medium (600 m2) size shop
- shop-top dwelling atop a non-residential use
- tourist accommodation

Precinct 1 Main Street – Principles of Development Control

9 Designated pedestrian/cycle paths should connect Main Street and the Town Square to carparking and the Core Area ~~core-retail shopping area~~

In relation to the Seaford District Centre DPA Explanatory Statement and Analysis, the alternative policy approaches suggested herein are consistent with the key outcomes sought on page 17, see for example:

"... Council's Strategic Plan, the City of Onkaparinga Community Plan 2028 as it:

- o Encourages higher densities at residential development nodes – areas of concentrated development close to main roads and public transport corridors, open space health and shopping facilities. It will also provide for a mix of residential and commercial land use in these areas;
- o Provides an opportunity for employment land and tourism facility land in conjunction with land for housing;
- o Provides the policy framework to develop the Seaford District Centre to include attractive entertainment and recreation options."

and

"... Council's Comparative Growth Scenarios Study 2008-2028 as it will enliven the Seaford District Centre by introducing a residential component and encouraging less separation of compatible land uses."

and

"... City of Onkaparinga Section 30 Development Plan Review 2008 and the following specific elements:

- o Investigate ways in which the roles of centres can be expanded to enhance their roles as community hubs, service providers and employment generators;
- o Initiate policies that recognise the importance of centres and ensure their survival;
- o Ensure centres are central to place making based urban regeneration initiatives;
- o Review car parking requirements."

Seaford Property Investments Pty Ltd requests that the DPA be amended to incorporate the above alternative policy directions.

I confirm that my client seeks the right to be heard at the public meeting scheduled for 3 December 2013.

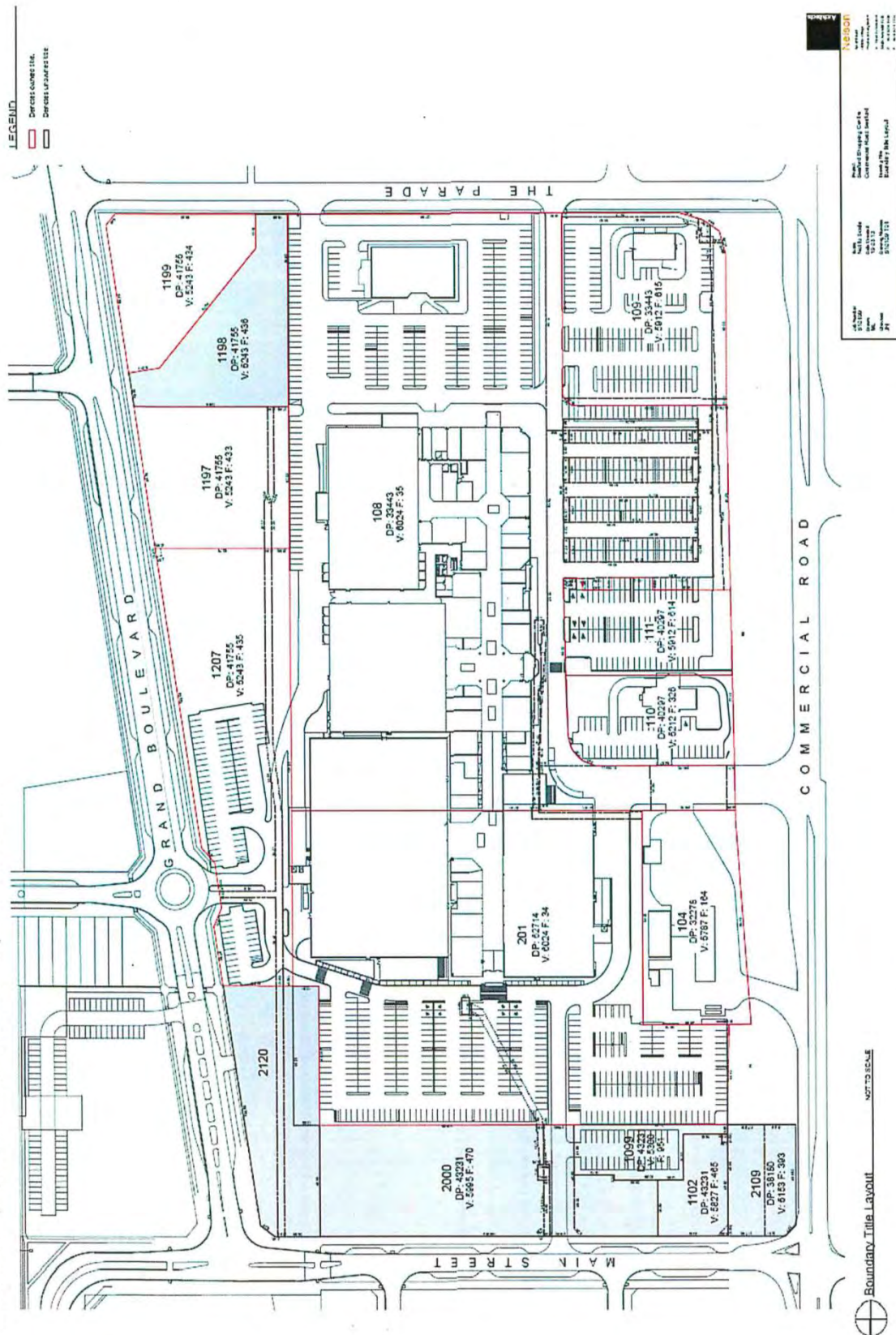
In the interim I would be pleased to discuss this submission with Council.

Yours faithfully


Garty Heynen, MP/IA
BA Planning, Grad Dip Regional and Urban Planning, Grad Dip Property

cc. PPI, by email
Cohen Group, by email
Nelson Architects, by email

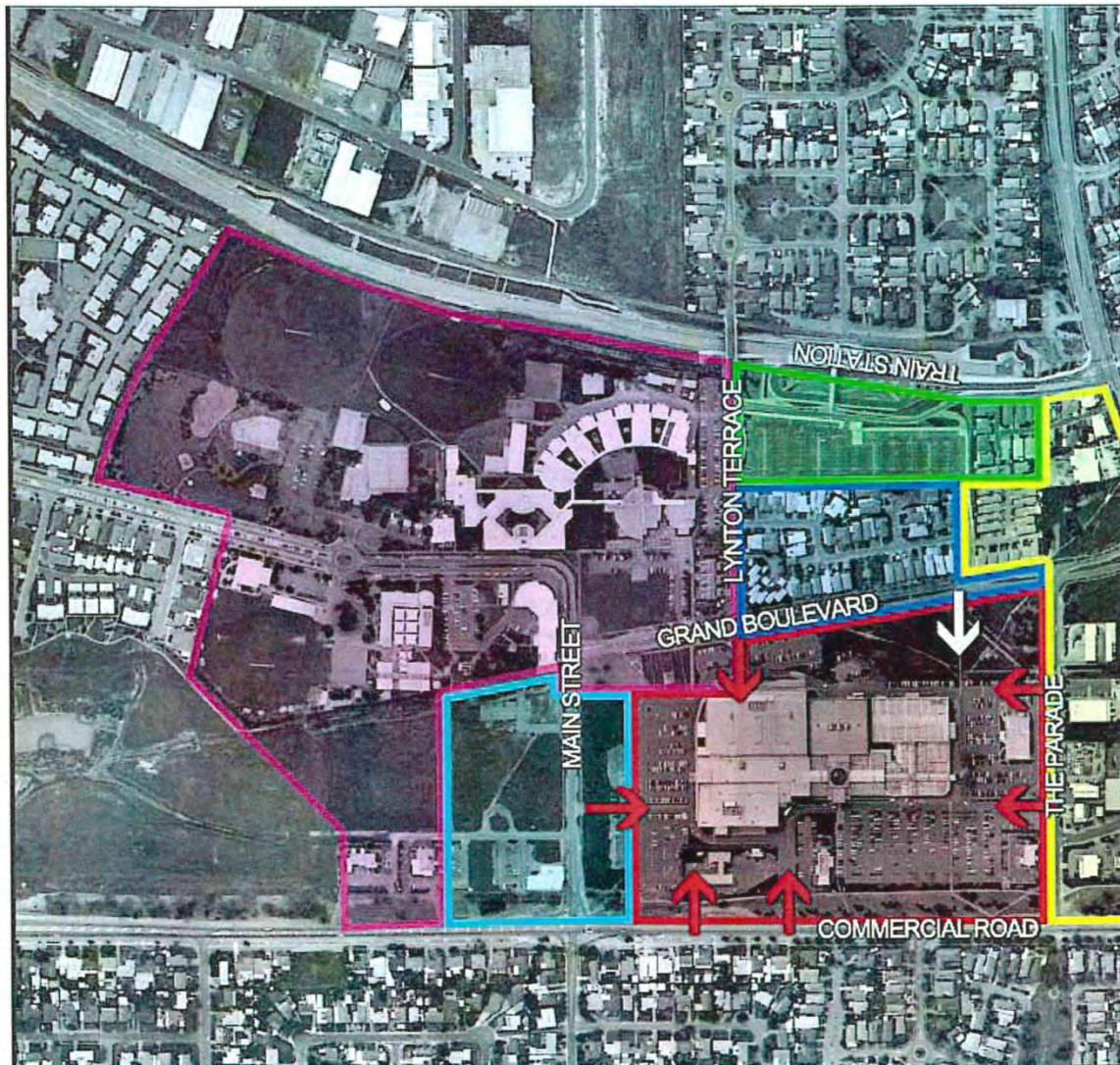
APPENDIX 1 - The Seaford Property Investments Pty Ltd and Associated Entities Land Ownership



APPENDIX 2 – Consolidated Concept Plan Onka/13 as Sought by Seaford Property Investments Pty Ltd



APPENDIX 3 – Current Development Plan Precincts (consolidation 4 July 2013)



APPENDIX 4 – Certificate of Title – Lot 201 DP 62714



Title Register Search
LANDS TITLES OFFICE, ADELAIDE
For a Certificate of Title issued pursuant to the Real Property Act 1986

REGISTER SEARCH OF CERTIFICATE OF TITLE * VOLUME 6024 FOLIO 34 *

COST : \$19.20 (GST exempt) PARENT TITLE : CT 5995/469
REGION : EMAIL AUTHORITY : TG 11044230
AGENT : NAPLE BOX NO : 000 DATE OF ISSUE : 18/11/2008
SEARCHED ON : 21/12/2011 AT : 14:17:18 EDITION : 2
CLIENT REF SEAFORD SC

REGISTERED PROPRIETOR IN FEE SIMPLE
SEAFORD PROPERTY INVESTMENT PTY. LTD. OF C/- LEVEL 2/50 HINDMARSH SQUARE
ADELAIDE SA 5000

DESCRIPTION OF LAND

ALLOTMENT 201 DEPOSITED PLAN 62714
IN THE AREA NAMED SEAFORD
HUNDRED OF WILLINGBA

EASEMENTS

SUBJECT TO THE EASEMENT OVER THE LAND MARKED F AND G TO DISTRIBUTION
LESSOR CORPORATION (SUBJECT TO LEASE 8890000) (TG 11044230)
SUBJECT TO EASEMENTS OVER THE LAND MARKED B AND H TO DISTRIBUTION LESSOR
CORPORATION (SUBJECT TO LEASE 8890000) (TG 6658545 AND TG 6954497
RESPECTIVELY)

TOGETHER WITH A RIGHT OF WAY OVER THE LAND MARKED D (RE 7220040)

TOGETHER WITH A FREE AND UNRESTRICTED RIGHT OF WAY OVER THE LAND MARKED A

SCHEDULE OF ENDORSEMENTS

11044227 LEASE TO WOOLWORTHS LTD. COMMENCING ON 25.9.2006 AND EXPIRING ON
30.6.2027 OF PORTION (TENANCY 54. TENANCY 55. TENANCY 55A AND
LOADING DOCK D IN PF 50622)
11044228 LEASE TO WOOLWORTHS LTD. COMMENCING ON 25.9.2006 AND EXPIRING ON
30.6.2027 OF PORTION (TENANCY 63. TENANCY 63A AND LOADING DOCK A
IN PF 50622)
11044239 MORTGAGE TO ST. GEORGE BANK LTD.

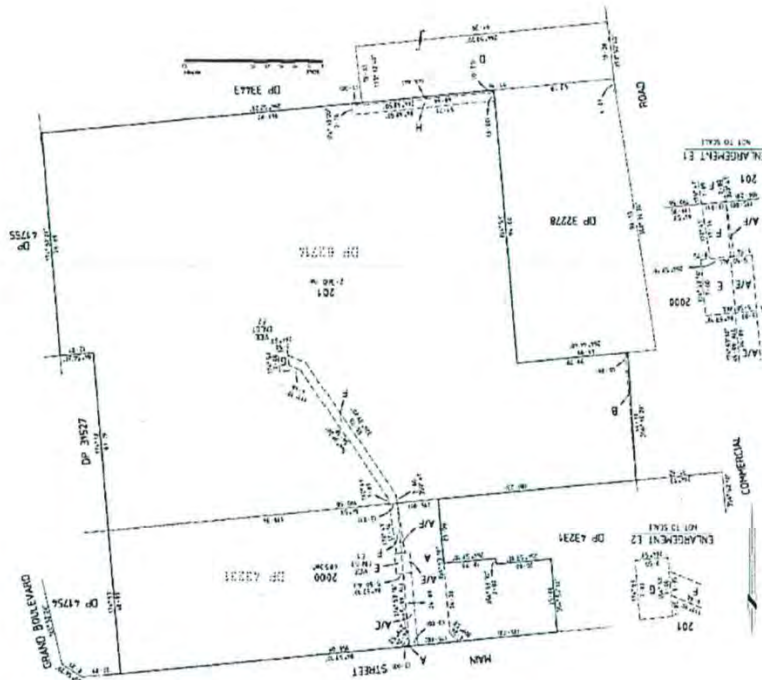
CONT.

Page 1 of 3

The Registrar-General certifies that this Title Register Search displays the records
maintained in the Register Book and other notations at the time of searching.



LANDS TITLES OFFICE ADELAIDE SOUTH AUSTRALIA
DIAGRAM FOR CERTIFICATE OF TITLE VOLUME 6024 FOLIO 34
SEARCH DATE : 21/12/2011 TIME: 14:17:18



Page 3 of 3

INTRO

20 November 2013

Chantal Milton
Principal Project Manager
City of Onkaparinga
PO Box 1
Noarlunga Centre SA 5168

Via email: chamil@onkaparinga.sa.gov.au

Intro Design Pty Ltd
Level 1, 33 Pirie Street
PO Box 207 Rundle Mall
Adelaide SA 5000

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Dear Chantal,

Re: Seaford District Centre Development Plan Amendment - Submission

We write on behalf of the Walters Family and Leasecorp Pty. Ltd. (Leasecorp) who own a number of properties within the area affected by the *Seaford District Centre Development Plan Amendment* (DPA). We have reviewed the draft DPA and appreciate the opportunity to make a submission on our clients behalf.

The Walters Family have held a long association and deep connection with the Seaford area. Through a company, Robinson Land Holdings, the Walters Family commenced farming in the region in the early 1900's, being associated with horticultural and agricultural activities upon the land until the late 1900's. In 1989, the Walters Family, through a company named Los Robles, was responsible for the construction and establishment of the Seaford Shopping Centre, which was the catalyst development for the town centre. This shopping centre was closely followed by numerous other commercial and retail developments within the Seaford Town Centre, a trend which they seek to continue.

The following commentary was previously provided within the response submitted to the consultation of the draft Seaford District Centre Shared Community 20 Year Vision, however, we felt it was important to include same as part of this submission to formalise its contents within the context of a draft DPA.

The Walters Family and Leasecorp own a range of properties throughout the District Centre and importantly, they own a large piece of land which fronts directly to the Main Street, north of the existing Seaford Shopping Centre. The site is currently vacant, however plans exist for its development along with a potential allotment reconfiguration with Council. The Walters Family and Leasecorp seek to establish a mixed use centre which comprises a supermarket, specialty retail, bulky goods and residential land uses.

The subject land is located entirely within the Seaford Policy Area 10, with a portion of the site also located within Precinct 1 Main Street.

Our site is important to the overall vision of the Seaford District Centre and, in particular, the role and function of the Main Street. Successful Main Streets satisfy a range of urban design criteria. The following criteria are important to the establishment of a Main Street:

Activating human space

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- A main street must have a *human scale*. A human scale is dictated by the height of the urban form as it relates to the width of the street and public realm. A human scale which presents the user with a level of amenity at the street requires a sense of enclosure. Car dominated land uses such as shopping centres surrounded by vast car parks or large tracts of empty land are not amenable to the development of a Main Street as they forcibly separate destinations and are generally at a scale which confuses the eye. Importantly, successful Main Streets locate car parks behind or beneath the building line;
- A Main Street must be *safe*. Safety within Main Streets needs to occur in a range of ways. Pedestrians, cyclists and vehicle users need to cohabit together within the public realm. It is therefore important to provide clear and distinct crossing points for pedestrians, distinct pathways for motor vehicles and bicycles and slow vehicular movement speeds to ensure conflict remains minimal. Furthermore, principles of crime prevention through environmental design must be imbued within the design of the Main Street. Opportunities for passive surveillance must occur through the establishment of active frontages, a mix of land uses must occur to stimulate activity throughout various times of the day;
- A Main Street must have a *mix of land uses*. Retail, restaurant/cafe and commercial land uses are all important to the development of a Main Street. These land uses need to contribute to a pedestrian oriented environment. Main Streets thrive where they are underpinned by a permanent population and, to this end, the provision of land uses in close proximity is desirable. Providing a permanent population within walking distance to the Main Street will create a degree of activity and ensure the Main Street is constantly used;
- A Main Street must be *comfortable* for the pedestrian. To ensure a Main Street is comfortable for the user first and foremost it needs to be safe at all times of the day. This only occurs when the previously mentioned concepts are adhered to. Furthermore, comfort is promoted where a degree of greenery with a high understorey, shelter and street furniture all exist; and
- Successful Main Streets usually exhibit a degree of *traffic* along the Main Street. Vehicular movement, and particularly, low speed car usage is desirable. Speed should be limited to between 30-40 km/h to minimise conflict with other users. Providing a quantum of vehicle movement at these speeds will create a sense of vitality without compromising safety concerns. A limited amount of on street vehicle parking in front of retail tenancies should also be provided.

Failure to establish a Main Street with these urban design fundamentals in the Seaford District Centre will result in a Shopping Centre focused community. It is noted that, within the District Centre, the Seaford Shopping Centre currently monopolizes supermarket and specialty shop retail trade within the township. This enclosed shopping centre delivers a range economic benefits for the owners and operators, however the centre does not contribute to the amenity of the public realm. A shopping centre focussed community exhibits the following characteristics:

- Negligible, fabricated history;
- Activity that is driven by sales and marketing campaigns;
- Enclosed malls that deliver a contrived environment;

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- Single ownership – providing no variety in function and operation;
- One land use – retail – operates during business hours only;
- Single design concept and style;
- Sales icons identify the shopping centre;
- Energy consumptive – high ecological footprint;
- Public realm is subordinate;
- Vehicles excluded internally – private car dominates;
- Controlled pedestrian movement; and
- Minimal 'soft' landscaping'.

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With the establishment of the new rail line to Seaford, and the strategic planning regime espoused within the 30 Year Plan, it is highly questionable whether in fact this shopping centre model is optimal for the long term social sustainability and vitality of the District Centre cognisant of what is needed to establish a true town centre.

DRAFT DPA RESPONSE

The draft DPA in our view recognises this sentiment and achieves a number of beneficial outcomes to the establishment of a Main Street through the Desired Character Statement, Objectives and Principles of Development Control within the Zone and Precinct 1 Main Street. I have, however, identified an issue within the Desired Character Statement, which states:

Buildings will typically be built with a zero setback to Main Street; with the occasional section of the building set back to create weather protected outdoor dining areas...

While I concur with the building setback distance of zero metres, providing an occasional building section setback has the potential to cause deleterious effects. I agree with the intent to provide outdoor dining areas, however, this should occur entirely within the public realm. The provision of building setbacks in specific areas has the potential to create areas of entrapment during non-active periods and create a place for vagrants to congregate. Should such an area be closed off afterhours it will not contribute to the public realm by providing a frontage with visual interest.

The northern portion of the subject land has the potential to contribute a quantum of dwellings to the locality. There are a number of benefits surrounding this such as:

- a stable population underpinning the Main Street;
- increased activity surrounding the Main Street precinct; and
- potential for passive surveillance to the large stormwater detention reserve to the north of the precinct.

The final point is paramount should council seek to establish the stormwater detention as an area of open space for community use.

Our clients support the intent of the draft DPA and the wide range of the initiatives espoused within such. The issue we have with the Desired Character Statement is minor, however, we believe it is important in order to create a Main Street with high amenity for all. Furthermore, we believe it is important to establish residential development on the northern portion of our site as it will contribute to the safety, security, vitality and amenity of the locality.

INTRO

On behalf of our clients we reserve our right to present further to these views should an opportunity be provided at the relevant public meeting.

Please contact the undersigned on 0402 359 653 should you wish to discuss further.

Sincerely
Intro Design Pty. Ltd.



Damien Ellis
Director

Intro Design Pty Ltd
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	Corresp. No.
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Fairmont Homes Group Pty Ltd
Ph 08 8112 3133
Fax 08 8221 5510
21-24 North Tce Adelaide 5000
PO Box 179 Hindmarsh SA 5007
ABN 26 110 542 553
Builders Licence No:188013
fairmontgroup.com.au

3 October 2013

Seaford District Centre DPA
c/ Chief Executive Officer
City of Onkaparinga
PO Box 1
Noarlunga Centre SA 5168

Dear Sir

SEAFORD DISTRICT CENTRE DPA

With regard to the above DPA I am representing Lifestyle SA who manage The Sands Lifestyle Village located on allotment 779 which in the southeast corner of the intersection of Seaford Rd and Grand Boulevard Seaford.

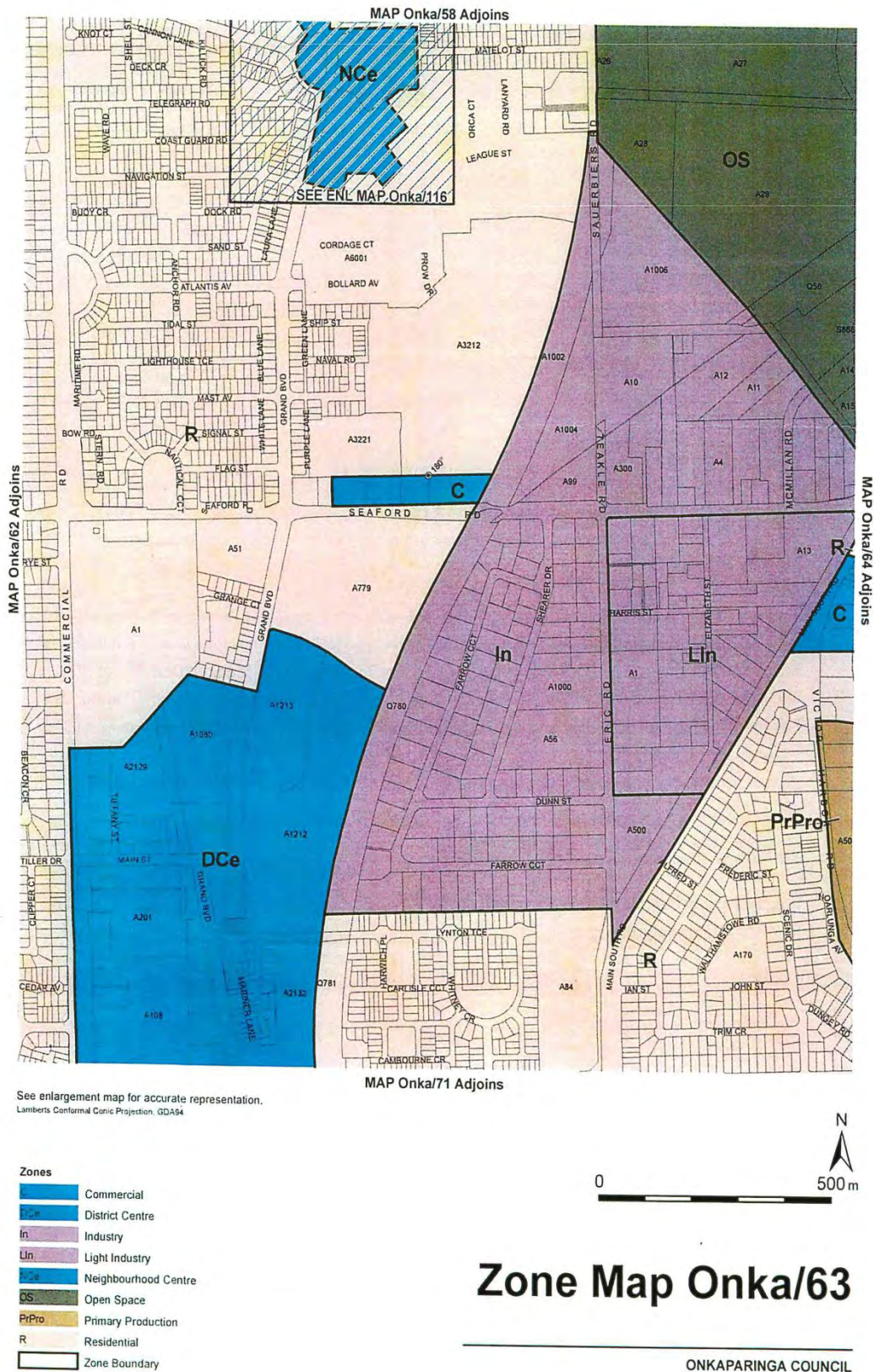
There is an inconsistency in the mapping in the DPA when compared with the current Development Plan – consolidated on 4 July 2013. The Zone Map Onka/63 (attached) has lot 779 in the Residential Zone. The Policy Area Map Onka/63 (attached) has lot 779 located the Medium Density Policy Area. The proposed Seaford District Centre Zone Concept Plan Onka/13 which is Attachment C in the DPA has the Concept Plan boundary and the Transition Area coming into the southern portion of lot 779 – the attached plan is marked showing the area in question. Clearly lot 779 is not within the District Centre Zone and as such should not have the Transition Area coming onto it. A revised Concept Plan Onka/13 should be prepared.

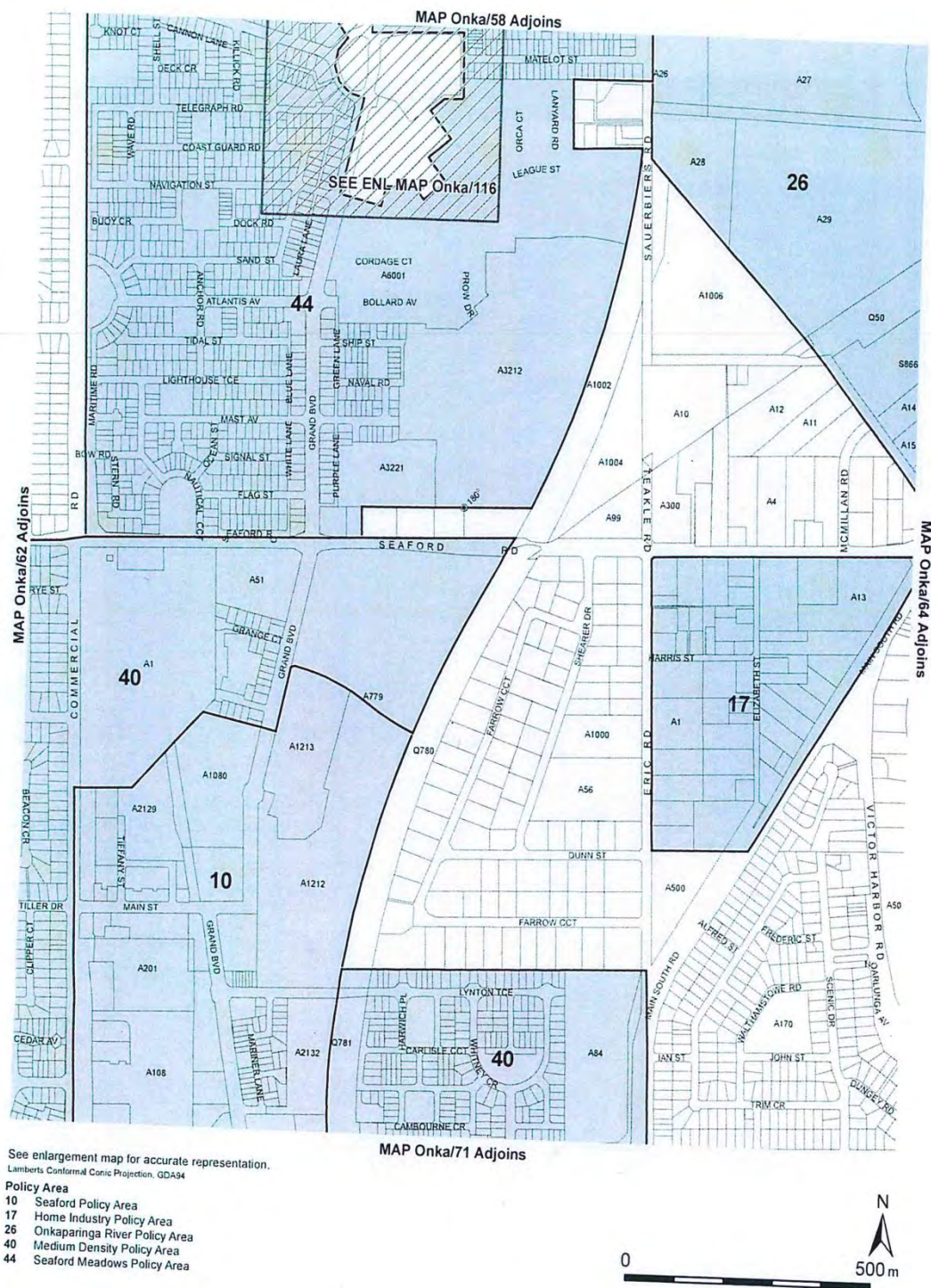
We wish to appear at the public hearing.

If you have any queries please contact me on 0402 134568 or by email on jstimson@fairmontgroup.com.au

Yours sincerely

John Stimson
Planning and Urban Design Manager
Fairmont Group





Policy Area Map Onka/63

Policy Area Boundary

ONKAPARINGA COUNCIL
Consolidated - 4 July 2013

Hatched Area is not in District Centre Zone.

Attachment C

