



Lot 5 Hampden Way, Strathalbyn
Code Amendment

Designated Entity:

Strath Property Investments Pty Ltd

For Consultation

Date:
November 2022



First Nations Acknowledgement:

We acknowledge and respect Aboriginal peoples as South Australia's first peoples and nations, we recognise Aboriginal peoples as traditional owners and occupants of land and waters in South Australia and that their spiritual, social, cultural and economic practices come from their traditional lands and waters; and they maintain their cultural and heritage beliefs, languages and laws which are of ongoing importance; We pay our respects to their ancestors and to their Elders.

Proprietary Information Statement:

This Code Amendment has been produced by Ekistics Planning and Design Pty Ltd. on behalf of the 'Designated Entity' by planning practitioners who have qualifications and experience as set out in Part 3(2)(b) of 'Practice Direction 2: Preparation and Amendment of Designated Instruments'.

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Have your Say

This Code Amendment is on consultation from **21 November 2022 to 23 January 2023 (5:00pm)**.

During this time you are welcome to lodge a written submission about any of the changes proposed in this Code Amendment.

Submissions on this Code Amendment can be made online, via email, or by post:

Online: via the Plan SA website https://plan.sa.gov.au/have_your_say/code_amendments

Email: enquiries@planningfutures.com.au – Attention to 'Lot 5 Hampden Way, Strathalbyn Code Amendment'

Post: 'Strathalbyn Draft Code Amendment' - PO Box 58, Daw Park SA 5041

During the engagement period, clarification or further information can be sourced from the engagement team at **Planning Futures** on **(08) 7093 2750** between 8:30am and 5:30pm Monday to Friday

Two informal drop-in sessions will be held at a local venue within Strathalbyn during the consultation period.

For further details regarding these sessions, please register your interest via email or check the Plan SA website listed above for further information

1. What is the Planning and Design Code

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

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

1.1 Planning and Design Code

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

1.2 Overlays

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

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

1.3 Zones

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

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

1.4 Sub-Zones

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

1.5 General Development Policies

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

1.6 Amending the Planning and Design Code

The *Planning, Development and Infrastructure Act 2016* (the Act) provides the legislative framework for undertaking amendments to the Code. With approval of the Minister for Planning and Local Government (the Minister) a Council, Joint Planning Board, Government Agency or private proponent may initiate an amendment to the Code and undertake a Code Amendment process.

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

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

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

2. What is proposed in this Code Amendment?

2.1 Need for the Amendment

The Affected Area (as outlined in **Section 2.2** below) is currently situated within the 'Hills Neighbourhood Zone' as expressed in the Planning and Design Code (the Code) and is considered a key strategic site for Strathalbyn, located at the northern 'gateway' into the township.

Since 2013, there have been five (5) retail and economic assessments of the Strathalbyn Township undertaken by four (4) separate retail and economic specialists. These assessment have been undertaken on behalf of 'Strath Property Investments Pty Ltd' (the Designated Entity), the Alexandrina Council and the former Department of Planning, Transport and Infrastructure (DPTI).

These retail assessments all generally concluded that there is a notable under provision of retail floor space in Strathalbyn (on a per person basis) and a significant level of escape expenditure occurring, which indicates that the township of Strathalbyn is not adequately serving local needs.

As part of this Code Amendment, a sixth retail and economic assessment has been undertaken in 2022 by Deep End Services (Deep End)(refer to **Attachment F**) to provide an updated assessment of the supply and demand for retail and commercial floor space within Strathalbyn.

Deep End's assessment concurred with previous assessments in relation to the undersupply of retail floor space, and in fact highlighted that this undersupply has become more prevalent since the last assessment in 2017. Deep End attributed this to Strathalbyn's steady long term population growth, recent trends in increased regional migration, and there being little to no growth in the provision of new retail floor space within Strathalbyn.

Despite the advantageous location of the Affected Area, the current 'Hills Neighbourhood Zone' primarily seeks low scale residential development, with small-scale complementary non-residential uses. Whilst some small-scale non-residential uses are contemplated in the Zone, a 'shop' (unless it has a gross leasable floor area less than 1,000sqm, or is a 'restaurant') is a 'Restricted' form of Development.

Noting the existing restrictions placed on development by the existing 'Hills Neighbourhood Zone', the Designated Entity seeks to amend the Code for the Affected Area, to facilitate the development of a convenience based local activity centre which generally comprises a supermarket of less than 3,000 sqm, specialty shops, bulky goods outlet, child care centre, consulting rooms and other personal or domestic services establishments.

Accordingly, the Code Amendment represents an opportunity to facilitate much needed development that satisfies the growing demand for retail offerings within the Strathalbyn township and provides a convenient and walkable, local-scale supermarket based centre for local residents within the northern growth area of the township.

Notably, the former Alexandrina Development Plan identified the Affected Area as a suitable location for non-residential development (and was referenced in the Desired Character Statement for the former Policy Area).

However, the intent of this policy did not translate through the Planning and Design Code, and the northern growth area of Strathalbyn remains currently underserved. In addition, retail expenditure and associated economic development is being lost to neighbouring Mount Barker due to an under provision of retail offerings within Strathalbyn more broadly.

As a reflection of this strategic location, a planning consent (Application No. 21007959) was issued on 1 September 2021 by the Alexandrina Council, within a portion of the Affected Area (on Allotment 12 in Deposited Plan 129957 – CT 6271/892), for the *'construction of a mixed-use development, comprising consulting rooms, an indoor recreation facility (gym) and shop (pharmacy) with associated car parking, signage and landscaping'*. It is noted that at the time of writing of this Draft Code Amendment, construction had commenced for this development.

When completed, this development will assist in delivering the Designated Entity's broader vision for the Affected Area and will be aligned with the future zone and policy framework sought by this proposed Code Amendment.

As a further indication of the strategic importance and location of the Affected Area, a planning consent (Application No. 21003380) has also been issued on the parcel immediately south of the Affected Area, at Lot 508 Hampden Way, Strathalbyn, for the *'construction of a Retail Fuel Outlet comprising a control building, car and dog washing facilities, fuel canopy, drive-through facility and associated signage, car parking and landscaping'*.

2.2 Affected Area

The Affected Area of this Code Amendment is illustrated in the maps provided in **Attachment A** and **Figure 2.1** below.

The Affected Area is located between Hampden Way, Adelaide Road and Braemar Drive, Strathalbyn and formally identified in the following Certificate of Titles:

- Certificate of Title Volume 6274 Folio 135, (Allotment 20 in Deposited Plan 130311);
- Certificate of Title Volume 6271 Folio 891, (Allotment 11 in Deposited Plan 129957);
- Certificate of Title Volume 6271 Folio 892, (Allotment 12 in Deposited Plan 129957);
- Certificate of Title Volume 6274 Folio 133 (Allotment 13 in Deposited Plan 130311); and
- Certificate of Title Volume 6274 Folio 134 (Allotment 14 in Deposited Plan 130311).

Copies of the Certificates of Title are contained within **Attachment G**.

Figure 2.1 Map of Affected Area



The Affected Area is currently vacant of any structures and buildings, however as stated earlier, construction has recently commenced for a *'mixed-use development, comprising consulting rooms, an indoor recreation facility (gym) and shop (pharmacy) with associated car parking, signage and landscaping'* (Application No. 21007959, issued on 1 September 2021 by the Alexandrina Council) within a portion of the Affected Area (on Allotment 12 in Deposited Plan 129957 – CT 6271/892).

The land is considered flat to gently undulating, with a general slope down toward North Creek from the north-east to the south-west of the site. This presents as an appropriate topography for future development.

To the north-west of the Affected Area, on the opposite side of Hampden Way, the land comprises recently constructed single storey detached residential dwellings. To the east of the Affected Area, on the opposite site of Adelaide Road, also comprises predominantly single storey detached residential dwellings.

To the south of the Affected Area, on the opposite side of Braemar Drive (Lot 508 Hampden Way), is a vacant parcel of land. As outlined earlier, this land is intended to be developed for the purposes of an approved 'Retail Fuel Outlet' (under Development Approval – Application ID 21003380). Also further south of the Affected Area is the 'Strathalbyn Skate Park', situated within the Angus River open space corridor. Further south of North Parade (and portion of Adelaide Road), there are two (2) land parcels occupied by the 'Strath Motel', one parcel occupied by the 'Strathalbyn Tennis Club', one parcel occupied by an existing child care centre and several parcels comprising single storey detached dwellings.

To the area immediately north of the Affected Area, the land is also under the control and ownership of the Designated Entity and is not currently occupied. A planning consent has been issued for a land division on the land to create 63 additional allotments for residential purposes (Application ID 21016382, Development Application No. 455/D417/21), with civil construction works currently underway.

As illustrated in **Figure 2.2** below, the Zone arrangements surrounding the Affected Area comprise:

- To the west of the Affected Area, over Hampden Way, land is located within the 'Hills Neighbourhood Zone';
- To the east of the Affected Area, over Adelaide Road, land is located within the 'Neighbourhood Zone';
- To the south of the Affected Area, over Braemar Drive, land is located within the 'Hills Neighbourhood Zone'. Further south of the Affected Area (and south of North Parade) land is located within the 'Established Neighbourhood Zone', and importantly, includes the 'Historic Area Overlay' (the 'Strathalbyn Suburban Neighbourhood Historic Area').

It is noted that at the time of lodgement of the 'Proposal to Initiate' in late 2021, the Affected Area comprised only one (1) allotment, known as the former 'Allotment 5 Hampden Way, Strathalbyn' (Certificate of Title Volume 6247 Folio 344 (Allotment 5 in Deposited Plan 125134)). Over time, the Affected Area has been subject to land division, and now comprises five (5) allotments as described above. However the extent of the Affected Area has not materially changed, just undergone a change from 1 allotment, to 5.

Figure 2.2 Images of Affected Area and its surrounds

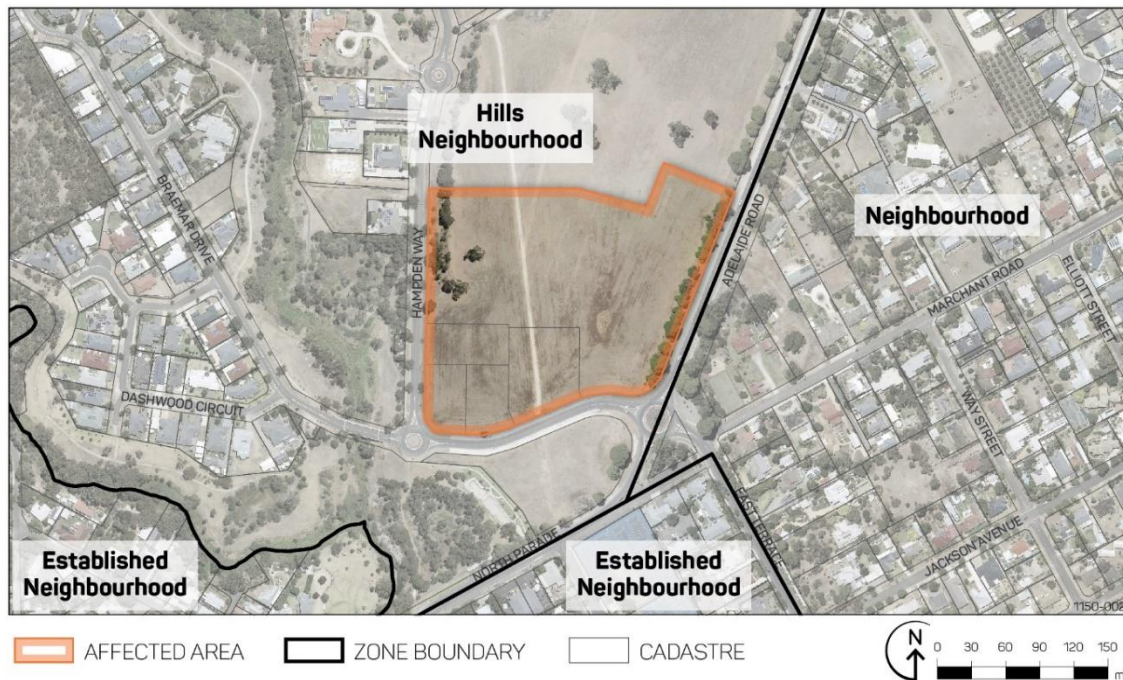


2.3 Summary of Proposed Policy Changes

2.3.1 Current Code Policy

A map which illustrates the current zoning for the Affected Area is provided in **Attachment B**, and is also illustrated in **Figure 2.3** below:

Figure 2.3 Current Zoning of Subject Land and Surrounds



The Affected Area is currently located within the **Hills Neighbourhood Zone** of the Code. The Affected Area is also subject to the following overlays:

- Affordable Housing
- Hazards (Bushfire - Urban Interface)
- Hazards (Flooding - Evidence Required)
- Murray Darling Basin
- Native Vegetation
- Prescribed Water Resources Area
- River Murray Tributaries Protection Area
- Traffic Generating Development
- Urban Transport Routes
- Water Resources

A description of each overlay is provided in **Attachment D**.

The Affected Area is also subject to the following Local Variations (TNVs):

- Concept Plan (113);
- Maximum Building Height (metres) (*Maximum Building Height is 8m*);

- Maximum Building Height (Levels) (*Maximum Building Height is 2 levels*);
- Gradient Minimum Frontage (Detached) (*Minimum frontage for detached dwellings where the site gradient is less than 1-in-8 is 15m; 1-in-8 to 1-in-4 is 18m; greater than 1-in-4 is 25m*); and
- Gradient Minimum Frontage (Detached) (*Minimum site area for detached dwellings where the site gradient is less than 1-in-8 is 500sqm; 1-in-8 to 1-in-4 is 1000sqm; greater than 1-in-4 is 2000sqm*).

The Desired Outcome (DO) for the 'Hills Neighbourhood Zone' is for the *"Development provides a complementary transition to adjacent natural and rural landscapes. Low density housing minimises disturbance to natural landforms and existing vegetation to mitigate the visible extent of buildings, earthworks and retaining walls"* (DO 1). Performance Outcome 1.1 suggests that development within the Hills Neighbourhood Zone should be *"Predominantly low density residential development with complementary non-residential uses compatible with natural landforms and a low density residential character"*, with examples of contemplated forms of development provided in Designated Performance Feature 1.1:

DTS/DPF 1.1: *Development comprises one or more of the following:*

- Ancillary accommodation
- Consulting room
- Dwelling
- Office
- Open space
- Shop
- Recreation area.

Notably, and as relevant to this Code Amendment, within the **Hills Neighbourhood Zone**, a 'shop' (unless it has a gross leasable floor area less than 1,000sqm, or is a 'restaurant') is a 'Restricted' form of Development.

2.3.2 Proposed Code Policy

Summary of Code policy changes

The Code Amendment proposes the following changes:

- Rezone the Affected Area from the 'Hills Neighbourhood Zone' to the **'Local Activity Centre Zone'**;
- Retain the following overlays across the whole of the Affected Area:
 - » Affordable Housing;
 - » Hazards (Bushfire - Urban Interface);
 - » Hazards (Flooding - Evidence Required);
 - » Murray Darling Basin;
 - » Native Vegetation;
 - » Prescribed Water Resources Area;
 - » River Murray Tributaries Protection Area;
 - » Traffic Generating Development;

- » Urban Transport Routes; and
- » Water Resources.
- Retain Concept Plan (113 Strathalbyn North);
- Remove the following TNVs (as relevant to current 'Hills Neighbourhood Zone'):
 - » Maximum Building Height (metres) (*Maximum Building Height is 8m*);
 - » Maximum Building Height (Levels) (*Maximum Building Height is 2 levels*);
 - » Gradient Minimum Frontage (Detached) (*Minimum frontage for detached dwellings where the site gradient is less than 1-in-8 is 15m; 1-in-8 to 1-in-4 is 18m; greater than 1-in-4 is 25m*); and
 - » Gradient Minimum Frontage (Detached) (*Minimum site area for detached dwellings where the site gradient is less than 1-in-8 is 500sqm; 1-in-8 to 1-in-4 is 1000sqm; greater than 1-in-4 is 2000sqm*).
- Introduce the following TNVs (as relevant to proposed 'Local Activity Centre Zone') and a new (in addition to Concept Plan 113 – Strathalbyn North) Concept Plan:
 - » Maximum Building Height (metres) (*Maximum Building Height is 9m*);
 - » Maximum Building Height (Levels) (*Maximum Building Height is 2 levels*);
 - » Concept Plan 'X' - Strathalbyn North Local Activity Centre

These changes are further outlined within the mapping provided within **Attachment C**.

Why the Local Activity Centre Zone?

The proposed zoning is illustrated in **Figure 2.4** with further discussion on the policy changes provided below.

Figure 2.4 Proposed rezoning of Affected Area



As illustrated in **Figure 2.4**, the Code Amendment proposes to apply the ‘Local Activity Centre Zone’ to the entire Affected Area to facilitate development of a convenient local activity centre comprising a small-scale supermarket (of approximately 2,500sqm), specialty shops, bulky goods outlet, child care centre, consulting rooms and personal or domestic services establishments.

Desired Land Uses

The ‘Local Activity Centre Zone’ generally seeks development in the form of:

DO 1 A range of small-scale shops, offices, business, health and community facilities to provide daily services to and support walkable neighbourhoods.

Performance Outcome 1.1 suggests that land within the ‘Local Activity Centre Zone’ will be used to accommodate “Retail, office, health and community facilities, services and other businesses provide a range of goods and services to the local community.” The corresponding Designated Performance Feature (DPF 1.1), provides the following examples of contemplated land uses for the Zone:

DTS/DPF 1.1: *Development comprises one or more of the following:*

- *Advertisement*
- *Community facility*
- *Consulting room*
- *Dwelling*
- *Office*
- *Pre-school*
- *Shop*

Within the ‘Local Activity Centre Zone’, a mixture of retail and commercial uses is sought, that are located in a convenient and walkable manner to surrounding neighbourhood areas. The following Performance Outcomes provide further guidance on the form and type of retail and commercial development contemplated for this zone:

PO 1.1 *Retail, office, health and community facilities, services and other businesses provide a range of goods and services to the local community.*

PO 1.4 *Development sited and designed to achieve vibrant and interesting streetscapes*

PO 1.5 *Changes in the use of land encourage the efficient reuse of commercial premises to maintain and enhance vibrancy within activity centres.*

Within the ‘Local Activity Centre Zone’, residential development should only be developed where it does not prejudice the operation of retail, office, or community facilities and services related activity within the zone. The following Performance Outcomes provide further guidance on the form and type of residential development contemplated for this zone:

PO 1.2 Residential development does not prejudice the operation of retail, office, or community facilities and services related activity within the zone.

PO 1.3 Residential development supports the vitality of underperforming centres.

Built Form and Height

Performance Outcome 2.1 provides some guidance on the form and height of development established within the Local Activity Centre Zone:

PO 2.1: Development complements adjacent development within the zone, and mitigates interface impacts on adjoining residential uses in a neighbourhood type zone, through appropriate building siting, scale and design

The Code Amendment also seeks to introduce a maximum building height of 2 levels (equal to a maximum height of 9 metres). This generally aligns with the current maximum heights allowed under the existing Hills Neighbourhood Zone. The only difference being the increase to the overall maximum height from the existing 8 metres to a maximum height of 9 metres. This is to allow the development of commercial and retail uses, which typically require higher ceiling heights than residential development.

Overlays to be applied to the Affected Area

Table 2.1 provides a summary of the Overlays to be applied to each Affected Area.

An explanation of each overlay, together with a summary of the proposed overlay changes is also provided **Attachment D**.

Table 2.1 Proposed Overlays for Affected Area

Existing Overlay	Summary of changes
Affordable Housing	Retains existing overlay
Hazards (Bushfire - Urban Interface)	Retains existing overlay
Hazards (Flooding - Evidence Required)	Retains existing overlay
Murray Darling Basin	Retains existing overlay
Native Vegetation	Retains existing overlay
Prescribed Water Resources Area	Retains existing overlay
River Murray Tributaries Protection Area	Retains existing overlay
Traffic Generating Development	Retains existing overlay

Existing Overlay	Summary of changes
Urban Transport Routes	Retains existing overlay
Water Resources	Retains existing overlay

The 'Urban Transport Routes Overlay' only applies to land abutting State Maintained Roads (i.e. Adelaide Road), or land within 25 metres of an intersection of such a road.

It is noted that 'Allotments 11, 12, 13 and 14' do not have direct access to Adelaide Road and is not within 25 metres of an intersection with this road. However as there is the ability for shared parking and common/shared access to be provided throughout a full development outcome, this overlay is proposed to be retained across all parcels within the Affected Area.

Technical and Numerical Variations

Section 66(4) of the *Planning Development and Infrastructure Act 2016* (the 'Act') provides that the Code may include provisions that provide for the adaptation of the rules that apply to account for local variations in appropriate circumstances (referred to within the Code as 'Technical and Numerical Variations (TNV's).

A TNV can take the form of Concept Plan which graphically illustrates desired outcomes for a particular area.

The Code Amendment proposes the creation a Concept Plan to guide the location of vehicle access (primary and secondary), open space, and stormwater management. The proposed Concept Plan is illustrated in **Figure 2.5** and provided in **Attachment C**.

The Code Amendment also seeks to introduce the following TNVs, as allowed for under DTS/DPF 3.1 of the Local Activity Centre Zone:

- Maximum Building Height (metres) (*Maximum Building Height is 9m*);
- Maximum Building Height (Levels) (*Maximum Building Height is 2 levels*);

It is noted that within the Code, 'low-rise' development refers to buildings up to and including two (2) building levels.

Figure 2.5 Concept Plan 'X' - Strathalbyn North Local Activity Centre'



3. What are the next steps in the Code Amendment?

3.1 Engagement

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

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

An Engagement Plan has been prepared for this Code Amendment to ensure that engagement will be conducted and measured against the principles of the Charter. Further information on the Community Engagement Charter can be accessed via Plan SA at www.plan.sa.gov.au/en/charter.

Engagement will be undertaken over an extended period, commencing on 21 November 2022 and concluding on 23 January 2023. A summary of the stakeholders to be engaged and the various engagement activities being undertaken for this Code Amendment is provided within the Engagement Plan prepared by Planning Futures, and can be found at the following link: https://plan.sa.gov.au/have_your_say/code_amendments

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

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

Online: via the Plan SA website https://plan.sa.gov.au/have_your_say/code_amendments

Email: enquiries@planningfutures.com.au – Attention to ‘Lot 5 Hampden Way, Strathalbyn Code Amendment’

Post: Ekistics - Level 3/431 King William Street, Adelaide SA 5000 - Attention to ‘Lot 5 Hampden Way, Strathalbyn Code Amendment’

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

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

- Whether the investigations associated with the Code Amendment have appropriately addressed the following key issues:
 - » Retail and economic demand and supply;
 - » Traffic and access impacts including distribution and volume of traffic within the surrounding road network;
 - » Native Vegetation impacts;
 - » Stormwater and flooding impacts;
 - » Infrastructure and servicing capacity and augmentation capability;

- » Other environmental and amenity considerations; and
- » Any other matters that may require further consideration/investigation before finalisation of the Code Amendment process.

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

- The zone that has been selected to apply over the Affected Area.
Considerable investigations have been undertaken to determine which zone would be the most appropriate to apply to the Affected Area, both in terms of economic feasibility and impact on the surrounding residential area, local road network and the environment.
- The geographic extent of the Code Amendment proposal.
- The policies and wording contained in the General Modules of the Planning and Design Code.
- The policies and wording contained in the Zones, Subzones and Overlays of the Planning and Design Code.

3.4 What will happen with my feedback?

Planning Futures, on behalf of Strath Property Investments Pty Ltd (the Designated Entity), is committed to undertaking consultation in accordance with the principles of the Community Engagement Charter and is genuinely open to considering the issues raised by people in the community.

All formal submissions will be considered by the Designated Entity when determining whether the proposed Amendment is suitable and whether any changes should be made.

Each submission will be entered into a register and you will receive an email acknowledging receipt of your submission. Your submission will be published on the PlanSA portal. Personal addresses, email and phone numbers will not be published, however company details will be.

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

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

3.5 Decision on the Code Amendment

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

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

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

4. Analysis

4.1 Strategic Planning Outcomes

The key strategic planning outcomes for this Code Amendment are summarised below and have been informed by the technical investigations discussed in Section 4.6.

4.1.1 *Strategic Outcome 1: Rezones the Affected Area to satisfy a demonstrated need for convenience based retail and commercial floor space, including a small-scale supermarket*

The Code Amendment has been largely informed by the ‘Retail & Economic Investigations’ report prepared by Deep End Services (Deep End), as contained within **Attachment F**.

These investigations justify the need for a secondary retail area within Strathalbyn, with the Affected Area being an ideal strategic location for an activity centre. The Deep End report provides recommendations in terms of how much land is required, what the most appropriate uses would be for the Affected Area, and importantly whether a secondary retail centre would have any impacts (both positive and negative) on the existing town centre.

The fundamental purpose of the Code Amendment is to rezone land within the Affected Area to facilitate the development of a 2,500 sqm supermarket, which is currently a ‘restricted’ form of development within the existing ‘Hills Neighbourhood Zone’. Importantly, the Deep End report undertakes a specific supermarket need assessment, given this is the purpose of the Code Amendment and main driver of the overall vision for the site.

The following key conclusions as summarised from Deep End findings, with respect of the need for additional retail and commercial offerings within Strathalbyn:

- State Government (pre COVID) population forecasts for Strathalbyn predict a long-term growth rate of 1.6% per annum to 2031 – a rate well above the Adelaide average. Short term growth rates are likely to be higher with 2021 recording the highest residential building approvals and established home sales in the last 10 years, and new land releases selling strongly in the last two years;
- Strathalbyn has experienced a steady long term population growth rate, which has now spiked in the last two years given the shifting trend towards regional living close to Adelaide;
- Whilst the existing ‘Township Main Street Zone’ within the town centre can support small incremental developments of retail and office floorspace, there are evident constraints in relation to site area, land use and heritage/character protection that are prohibitive to assembling the minimum 1-hectare site required for a competitive 2,500 sqm supermarket in central Strathalbyn;
- Overall, Strathalbyn has approximately 14,200 sqm of retail floorspace and 4,550 sqm of office, bank and health-related office premises. Excluding the former IGA premises (pending current redevelopment) there were just three (3) vacancies observed across central Strathalbyn, which represents just 2% of all retail floorspace;

- Other than an expansion to Woolworths in 2016, there has been little new floorspace developed within Strathalbyn over the last 10 years, despite the strong continued growth;
- The current rates of retail floorspace in the main trade area are falling. There is approximately 1.0 sqm per capita of retail floor space, but without any additions to current supply and based on projected population growth, this rate will fall to just 0.83 sqm per capita by 2031;
- A reasonable increase in the rate of retail floorspace provision in the order of 0.2-0.3 sqm per capita would justify 3,700-5,600 sqm of new retail floorspace by 2026, and 4,000-6,000 sqm by 2031.
- On the assumption that growth rates remain constant, the demand level or supportable supermarket floorspace will also grow from 7,900 sqm in 2022 to 9,330 sqm in 2031;
- Within Strathalbyn the current supermarket supply (which comprises the Woolworths at 3,500 sqm) represents just 44% of the trade area demands. Even with the proposed IGA in Strathalbyn (assuming a hypothetical commencement date of 2023), then supply levels will still be about 50% of the theoretical demand;
- The introduction of a new supermarket of 2,500 sqm, would raise the supply / demand ratio to 80%, as per Deep End's analysis;
- The residual supermarket demand (20% in 2025 falling to 28% in 2031) is an acceptable, if not efficient, level of externally supported floorspace which allows for residents of the secondary catchment shopping in Mt Barker or those in the south gravitating to Goolwa;
- It is evident that even with a proposed IGA and potential development of a new 2,500 sqm supermarket within the Affected Area, there is substantial residual demand for the next 10 years, with the gap between demand and supply increasing to 2031.

Strathalbyn will need to find an answer to this existing under provision of retail floor space, and the Affected Area presents as a unique opportunity that could provide a short to medium term solution. If the opportunity is deferred, the alternative may be a more remote location where its viability will be harder to prove and timing put off into the long term.

4.1.2 Strategic Outcome 2: Implements a policy framework that manages environmental and off-site impacts for future retail and commercial development

A key strategic outcome for this Code Amendment is to establish guiding policy that will assist in the appropriate management and mitigation of environmental and off-site impacts resulting from future development of the Affected Area.

The policy framework proposed for this Code Amendment seeks to balance the strategic goals of delivering a local scale activity centre to the northern area of Strathalbyn, with the need to manage any potential impacts to surrounding residential neighbourhoods, the movement network, native vegetation, and the North Creek/Angus River environs.

The Affected Area is situated within a vacant area that has remained largely clear of vegetation and structures for an extended period of time. There is also no existing native vegetation (pursuant to the *Native Vegetation Act 1991*) located within the Affected Area.

More recently, construction has commenced for a *‘mixed-use development, comprising consulting rooms, an indoor recreation facility (gym) and shop (pharmacy) with associated car parking, signage and landscaping’* (Application No. 21007959, issued on 1 September 2021 by the Alexandrina Council) within a portion of the Affected Area (on Allotment 12 in Deposited Plan 129957 – CT 6271/892).

The location of open space and a large stormwater basin is illustrated on the proposed ‘Concept Plan ‘X’ - Strathalbyn North Local Activity Centre’ (**Attachment C**). This area will be preserved to not only protect areas prone to flooding, but provide opportunities to protect existing mature vegetation (albeit non-native vegetation as defined under the *Native Vegetation Act 1991*). The location of future public open space along the western boundary of this Affected Area will also assist with the management of interface impacts to the west, and preserving the natural outlook presently experienced by existing residential properties fronting Hampden Way.

In addition to the proposed ‘Concept Plan ‘X’ - Strathalbyn North Local Activity Centre’, additional protection to watercourses will be provided via the continued implementation of the ‘Native Vegetation Overlay’, the ‘Murray Darling Basin Overlay’, the ‘Prescribed Water Resources Area Overlay’, the ‘River Murray Tributaries Protection Area Overlay’, and the ‘Water Resources Overlay’. An explanation of each Overlay is provided in **Attachment D**.

As demonstrated within the Environmental Noise Assessment undertaken by Sonus and provided in **Attachment F**, it is anticipated that any future development of the Affected Area can be undertaken in a manner which would appropriately address the environmental noise requirements of the Planning and Design Code. In particular future development will be able to satisfy existing policy under ‘General Development Policies – Interface between Land Uses’, through adoption of simple acoustic treatments and appropriate operational practices (such as limited operating hours, waste collection, and delivery times).

4.1.3 Strategic Outcome 3: Enables the provision of infrastructure and services, such roads, water, sewer, power and the management of stormwater

A key strategic outcome for this Code Amendment is to future proof the provision of infrastructure and servicing for future retail and commercial development under a ‘Local Activity Centre Zone’.

Infrastructure and servicing requirements (including transport infrastructure) for the Affected Area is addressed by investigations undertaken by Greenhill (servicing), CIRQA (transport), and Tonkin Engineers (stormwater/flooding) as contained within **Attachment F**. A summary of the findings and recommendations are outlined within Sections 4.5 and 4.6.

The investigations conducted by Greenhill confirm that the Affected Area is capable of being serviced by existing services and infrastructure, including sewer, mains water, electricity, gas, telecommunications infrastructure.

Tonkin Consulting (Tonkin) undertook modelling and preliminary drainage advice across the Affected Area, in conjunction with the residential land division to the north. The northern residential development has its own stormwater network and manages major flows through the existing road network and a detention basin located to the immediate north west of the Affected Area. Tonkin outlines that flows from this residential development will not be conveyed through Affected Area as a result.

To manage additional flows resulting from the future development within the Affected Area, Tonkin advised on the need to provide a 1100 cubic metre basin in the north western portion of the site. The size and dimension of this basin has been incorporated into the proposed 'Concept Plan 'X' - Strathalbyn North Local Activity Centre' (**Attachment C**) and will also ensure that future development of this flood prone area will be avoided.

A transport assessment performed by CIRQA suggests that the requirements of the 'Traffic Generating Development Overlay' are capable of being addressed without the need to upgrade any intersections or traffic management treatments external to the site. A number of primary and secondary access points have been proposed within 'Concept Plan 'X' - Strathalbyn North Local Activity Centre', including those along Adelaide Road (a 'state maintained' road).

4.2 Consistency with the State Planning Policies

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

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

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

4.3 Consistency with the Regional Plan

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

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

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

The *30-Year Plan for Greater Adelaide* is relevant for this Code Amendment.

This Code Amendment is considered to be consistent with the *30-Year Plan for Greater Adelaide* as outlined in **Attachment E**.

4.4 Alignment with other key strategic documents

This Code Amendment also aligns with the following key policy documents, as discussed below.

4.4.1 Alexandrina 2040

The 'Alexandrina 2040' plan is the key strategic framework for Council's long term strategic directions to deliver on the community vision for the district.

With regards to the Code Amendment, the 2040 plan identifies that *'Our community needs a high-quality road, water, rail and trail network that is safe, well maintained, supportive of healthy lifestyles, and environmentally sustainable.'*

Policy Response

The Affected Area is located outside of the existing town centre and within the northern growth area of Strathalbyn. Currently, residents to the north of Strathalbyn have limited access to local commercial and retail offerings and must travel by car into the town centre (or Mt Barker) for their daily needs.

The Code Amendment seeks to provide a convenience-based alternative, that will encourage increased walkability and healthy lifestyles for local residents.

4.4.2 Alexandrina Community Strategic Plan 2014-23

The 'Community Strategic Plan' establishes long term aspirations of the district and outlines strategies to achieve them. The key aspirations of the Community Strategic Plan most pertinent to the Code Amendment are as follows:

Innovate throughout our Region

- *Showcase 'Alexandrina 2040' as a premium living and lifestyle destination*
- *Attract diverse local industries and strengthen our workforce to grow the local economy and increase employment opportunities*

Activate our Spaces

- *Identify and encourage lifestyle, heritage and visitor experiences*
- *Design and plan for high quality, integrated and healthy spaces and places*

Policy Response

The Code Amendment will assist in delivering on these aspirations and strategies by facilitating a new local activity centre comprising a mixture of retail and commercial offerings, within a walkable catchment to the residents of the northern growth area of Strathalbyn.

Bringing in new business opportunities to the district will create more employment and foster continued growth of the local economy. The Code Amendment also seeks to ensure that more retail spending is retained within Strathalbyn, and not lost to the nearest regional centre at Mt Barker.

4.4.3 Regional Public Health Plan for Southern & Hills LGA (2015)

The 'Regional Public Health Plan for Southern & Hills LGA' was developed by the Southern and Hills Local Government Association on behalf of six of its member councils, including the Alexandrina Council.

The plan identifies the 'State of Health' of the various communities across the region and establishes 3 themes that provide a framework for the plan.

'Theme 1: Healthy Environments' is most relevant to the Code Amendment and seeks '*the provision of healthy environments through quality places, lifestyle opportunities and environmental health*'.

Strategy 1 of the Theme seeks to:

"Plan for built environments that support communities to be active and socially connected and contribute to the health and well-being of communities (all generations, levels of ability and cultures). This will require a focus on creating liveable and 'walkable' towns and places with appealing and good quality public realm, open spaces and community facilities."

Policy Response

The Code Amendment focuses on providing a convenient local activity centre and encourage healthy, active lifestyles through improved walkability for local residents.

4.4.4 Alexandrina Economic Development Strategy 2016-2022

The 'Economic Development Strategy' was prepared by Essential Economics Pty Ltd, in conjunction with Hemisphere Design (Aust) Pty Ltd, on behalf of Alexandrina Council, to guide Council's role in fostering economic development within the district.

The plan identifies that Council are '*open for business*' and seeking to be the '*location of choice for new businesses and investment in the region*'.

The plan outlines that there is both a demand for local services, driven by the population growth, within the retail, health, community and entertainment sectors, however there is also a threat of losing economic activity to other regional centres (such as nearby Mount Barker, located 23.5km to the north), with residents required to travel out of the district to access basic services.

Policy Response

Of particular note, and in relation to the Affected Area, the plan identified that work being undertaken by the Council in preparation of the Strathalbyn Town Plan would free-up development opportunities in the existing town centre, while also exploring development opportunities for land to the north of the centre.

The Code Amendment seeks to establish development opportunities within the northern growth area. As evidenced in the Deep End report, there is demonstrated need for establishing a new supermarket based activity centre to service local residents in Strathalbyn, whilst ensuring that the role of the town centre is retained as the primary retail and commercial centre, and 'cultural centre' of Strathalbyn.

4.5 Infrastructure Planning

Infrastructure and servicing requirements for the Affected Area are addressed in the reports prepared by Greenhill, CIRQA and Tonkin Engineers and contained within ***Attachment F***.

Table 4.1 below addresses the infrastructure planning requirements for this Code Amendment.

Table 4.1 Infrastructure Planning Analysis

Infrastructure	Relevant Agency	Response/Comment
Stormwater	Alexandrina Council	<p>Tonkin Consulting undertook a stormwater management review of the development site, in conjunction with the residential land division proposed, to the north. The northern residential development has its own stormwater network and manages major flows through the existing road network and a detention basin located to the immediate north-west of the Affected Area. Tonkin outline that flows from this residential development will not be conveyed through Affected Area as a result.</p> <p>In order to maintain the existing functionality of North creek, no construction should occur within the flood plain adjacent the creek to ensure there is no worsening of flooding to anyone downstream of the site.</p> <p>To manage additional flows resulting from the increased development, the 1100 cubic metre basin will be required. For an average 1.0 m deep basin, this is expected to equate to an area of between 2,000 – 2,300 sqm (depending on batter slopes being 1:4 – 1:6 and having an allowance of 20% for shaping). In addition to this area, an additional; 1,200 sqm will be required to build up the western wall of the basin along the edge of North creek. The approximate land requirement of a basin with 1:4 sides, the undeveloped area for north creek and the required area for the western basin wall has been reflected in the 'Concept Plan 'X' – Strathalbyn North Local Activity Centre Plan' (<i>Attachment C</i>)</p> <p>Future minimum floor level for development (near to North Creek), and the top of the basin should be set to 76.1 m AHD, this will allow the activity centre development to be outside and above the 1% AEP storm event flooding extents. It is noted that the worst-case water level within the basin was modelling to be 75.8m AHD (allowing for 300 mm freeboard).</p>
Road Infrastructure	Council/DIT	Traffic surveys and SIDRA Intersection modelling undertaken by CIRQA of the Affected Area's primary Adelaide Road access identifies that future 'total traffic' volumes will be readily accommodated at the intersection, with negligible impact upon its operation. Similarly, the existing Adelaide Road/Braemar Drive/East Terrace roundabout will continue to operate satisfactorily upon full realisation of the Affected Area's development potential.
Wastewater	Alexandrina Council	<p>The existing Alexandrina Council wastewater network adjacent the site includes the following infrastructure:</p> <ul style="list-style-type: none"> 150 mm diameter gravity sewer main within the western verge of Hampden Way, north of the pump station, and within the eastern verge to the south of the pump station. wastewater pump station on the western side of Hampden Way, opposite the subject land. wastewater rising main extending south from the pump station, along the eastern verge of Hampden Way A 150 mm diameter gravity sewer main within Braemar Drive, extending east from Hampden Way, and then south to North Parade. <p>It is understood that construction is underway for new 150 mm gravity sewer main extensions both, north along the eastern verge of Hampden Way and east along the northern verge of Braemar Drive. This provides wastewater connections for the newly created or proposed allotments and provides for future extension and connections.</p>
Potable Water	SA Water	SA Water have advised that the mains adjoining the site should be suitable and adequate to serve the Affected Area.
Electrical Supply	SAPN)	SAPN have advised that for the Affected Area there are a number of HV connection points available at Adelaide Road, Braemar Drive and Hampden Way. Due to the major load associated with a supermarket, a pad-mount transformer will typically be required, located close to buildings, switchboard & equipment, along with the necessary easements. Augmentation works are unlikely to be required to serve the Affected Area.
Telecommunications	Telstra and NBN	Telstra and NBN Infrastructure is presently available to service the Affected Area.
Gas Supply	APA Group	There is no existing gas reticulation infrastructure located within Strathalbyn. If required, gas will need to be supplied by alternative individual site bottles or tanks.

4.6 Investigations

The extent of investigations that have been undertaken as part of the Code Amendment process have been agreed by the Treasurer (as delegate of the Minister for Planning and Local Government) in the previous 'Proposal to Initiate' document.

The following technical investigations have been undertaken to inform the Code Amendment:

- Retail and economic investigations;
- Traffic and access analysis;
- Infrastructure and servicing analysis;
- Native vegetation investigations;
- Aboriginal Heritage Assessment;
- Environmental Noise Investigations;

Technical reports addressing each of the above-mentioned matters are provided in **Attachment F**.

Pursuant to Section 73(6)(f) of the PDI Act, the Treasurer has also prescribed that the following additional investigations be carried out.

- *Undertake high-level investigations to identify potential environmental impacts and mitigation measures, having consideration to native vegetation, flora, fauna and the adjacent Angas River and tributary;*
- *Conduct a search of the Aboriginal Heritage Registers to identify relevant Aboriginal heritage considerations, including any identified cultural sites and objects.*
- *Prior to engagement commencing, undertake a retail and economic assessment to the satisfaction of the Department*

The outcome of these investigations are addressed below.

4.6.1 Suitability of the Local Activity Centre Zone

The Designated Entity has explored the suitability of applying the 'Local Activity Centre Zone' over the Affected Area, taking into consideration the strategic location of the Affected Area within Strathalbyn township.

The Desired Outcome for the 'Local Activity Centre Zone' is reproduced below:

DO 1: *A range of small-scale shops, offices, business, health and community facilities to provide daily services to and support walkable neighbourhoods.*

Performance Outcome 1.1 suggests that land within the 'Local Activity Centre Zone' will be used to accommodate *"Retail, office, health and community facilities, services and other businesses provide a range of goods and services to the local community."* The corresponding Designated Performance Feature (DPF 1.1), provides the following examples of contemplated land uses for the Zone:

DTS/DPF 1.1: *Development comprises one or more of the following:*

- *Advertisement*
- *Community facility*
- *Consulting room*
- *Dwelling*
- *Office*
- *Pre-school*
- *Shop*

The Local Activity Centre Zone is the most appropriate zone in the context of the desired outcomes sought within the Affected Area. That is, to facilitate the development of a convenience based local activity centre which generally comprises a supermarket of less than 3,000 sqm, specialty shops, bulky goods outlet, child care centre, consulting rooms and other personal or domestic services establishments. By utilising the Local Activity Centre Zone, this will seek to ensure that the Affected Area would sit as secondary activity centre, in the hierarchy of activity centres within Strathalbyn and broader region.

The Local Activity Centre Zone is appropriate in the context of the scale of land available (given the constraints of the stormwater management requirements as included within Concept Plan 'X' – Strathalbyn North Local Activity Centre Plan').

Strategic assessment of an activity centre within the Affected Area

Strathalbyn is generally a 'concentric township', with earliest settlements occurring along the Angus River (in the now 'Town Centre Core' and 'High Street' precinct). Growth has since spread outward in all directions, seeking to maintain close proximity to existing services, shops and facilities within the town centre.

Angus River is a 'green spine' through the township, providing amenity and passive recreation, however given its steep escarpments and waterway, it also acts as a significant movement barrier through the township.

Major vehicular access/bridges and pedestrian crossings across the Angus River are mostly centralised within the town centre itself. Key arterial roads (such as Adelaide Road) run through the town centre (generally in a north-south direction), acting as a further barrier to pedestrian movement.

The Affected Area is located in the 'Northern Growth' area of the township, bounded by North Creek/Angus River to the west and Adelaide Road to the east. This Northern Growth area has a distinctive character in comparison to other older residential areas of Strathalbyn – and represents a more contemporary character, with residential dwellings being similar in form and appearance to many Adelaide Metropolitan growth areas.

The Affected Area and Northern Growth Area is located wholly outside of an 800 metre walkable catchment (linear) of the central Town Centre area. The majority of the Northern Growth Area is also located outside an 800 metre walkable catchment (linear) of the High Street precinct.

A new local activity centre within the Affected Area would provide local shops and services within an 800m walkable catchment to approximately 90% of Northern Growth area residents (and residents to the east of Adelaide Road).

4.6.2 Retail and Economic investigations

The Code Amendment has been largely informed by the ‘Retail and Economic Investigation’ report prepared by Deep End. This report considers the current status of Strathalbyn’s retail offerings in consideration of anticipated growth and retail activity.

Deep End specifically sought to provide advice on the need for a secondary retail area within Strathalbyn, including how much land would be required, what are the most appropriate uses for the Affected Area, and whether this secondary retail centre would have any impacts (both positive and negative) on the existing town centre.

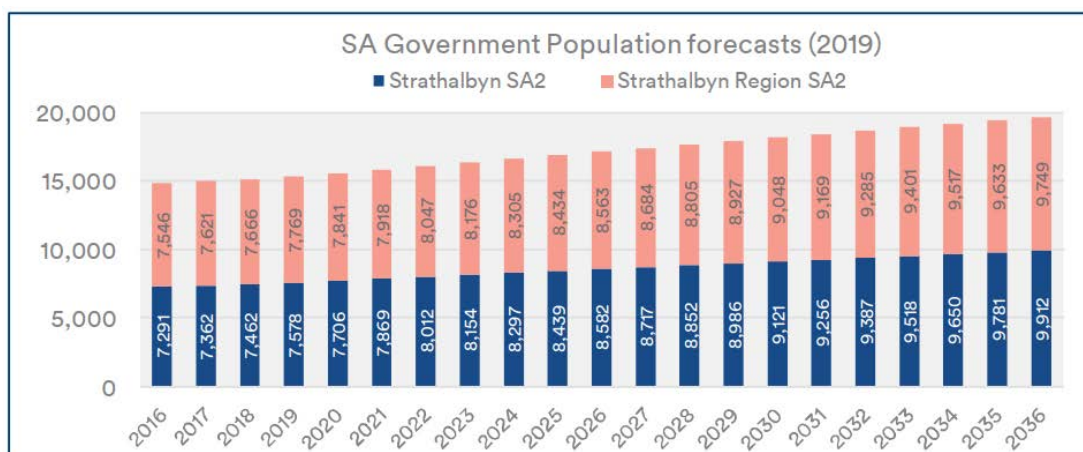
Strathalbyn Context and Profile

Strathalbyn is on the verge of a period of strong growth, particularly with rising popularity as a retirement destination and also being a commuter town close to Adelaide and the Adelaide Hills region. Several available land releases and affordable prices, relative to Adelaide and Mt Barker, coupled with the pandemic-induced trend towards regional living, has boosted land and home sales and residential building approvals in the last two years.

While previous reports have focussed on quantifying levels of escape spending and in some cases, opaque models of retail spending and retail supply and demand calculations, Deep End also sought to provide a more targeted analysis towards a specific supermarket need assessment, particularly given the fundamental purpose of the Code Amendment is to meet the evident demand for a small-scale supermarket (less than 3,000sqm).

The pre-COVID forecasts show the Strathalbyn ‘SA2’ (corresponding to the town and close rural areas) will increase from a 2021 estimate of 7,869 people - to 8,582 in 2026 and to 9,256 in 2031. The growth rates are a strong 1.7% per annum to 2026 and 1.5% from 2026 to 2031, as demonstrated in **Figure 4.1** below.

Figure 4.1 Strathalbyn Statistical area forecasts (Source: SA Government 2019)



For the Strathalbyn region, which covers the main rural areas of Alexandrina around Strathalbyn and further south towards (but not including) Goolwa, the projections are also strong. Forecasts show population growing from 7,918 in 2021 to 9,169 in 2031. This equates to an average of 1.5% per annum over 10 years.

To put these rates into context, the SA Government's projections for Adelaide over the next 10 years is 0.9% per annum, and regional South Australia at 0.5% per annum. These forecasts in the short term and possibly the medium term, could prove to be conservative given recent land sales and projected lot releases in Strathalbyn.

Review of Previous Retail & Economic Assessments

In their analysis, Deep End undertook a review of the previous retail assessments prepared for the Strathalbyn township over the period between 2013 and 2017. These assessments were prepared in response to, or support of the previous '*Strathalbyn Township and Environs DPA*', being undertaken by the Alexandrina Council.

There were a total of five (5) retail assessment reports prepared by four (4) different economic consulting firms, and were prepared on behalf of either the Designated Entity, DPTI and the Alexandrina Council. They are listed as follows:

- *Strathalbyn Retail Review*, April 2013 (Property & Advisory)
- *Retail Needs Assessment, Strathalbyn*, August 2013 (Urbis)
- *Peer Review of Property & Advisory Strathalbyn Retail Review*, October 2013 (Urbis)
- *Strathalbyn Retail Peer Review & Assessment*, March 2015 (Essential Economics)
- *Retail Analysis Review, Strathalbyn*, June 2017 (SGS Economics and Planning)

Two of the four consultants supported the development of more retail floorspace in Strathalbyn and specifically, an activity centre within the Affected Area. Two consultants engaged by Council (Property Advisory & SGS) concluded that future demand levels do not warrant the development of new retail floorspace outside the town centre zone.

However Deep End emphasise that with the elapsed period of nine (9) years from the first retail assessment, and five (5) years since the last report, several economic and development issues have emerged prompting the need for a new assessment. These are summarised as follows:

- Strathalbyn has continued to grow with recent large greenfield subdivisions and building activity that is higher than previously envisaged;
- The first stages of the 'Strathalbyn Town Centre Revitalisation Plan' are now complete, with more works/stages scheduled. These works will place the town centre in a better position to attract more visitors and sustain increases in retail floorspace in Strathalbyn;
- Other than an expansion to Woolworths in 2016, there has been little new floorspace developed in the Town Centre in the last 10 years; and
- The various reports provided retail demand forecasts for 10 years to 2025 or 2026. This forecast period is now close to being reached with limited retail development in the town over the elapsed time,

largely due to the zoning, heritage and land use constraints in assembling a development site of any considerable scale (within the town centre).

All reports drawing conclusions for and against the establishment of additional retail floorspace in Strathalbyn are now out of date. Deep End outline that reports adopting steady population growth rates with simple and transparent methodologies and verifiable calculations are still relevant, to some extent.

The earlier Urbis and Essential Economics reports have a common approach and findings that are sound, based on the information at the time. The passage of time and further growth would only strengthen their findings.

The Planning & Advisory report was critically and correctly reviewed by Urbis and Essential Economics, however was put aside by Alexandrina Council in favour of the latest 2017 SGS report, which Council had commissioned. Deep End considered that the SGS report, in parts, is complex and opaque in its method and calculations raising questions about the veracity of its long-term spending model.

The concept of ‘escape spending’ is extensively analysed in previous reports with consultant estimates varying widely. Deep End conclude that the standard method to calculate escape expenditure involves a number of calculations and assumptions on spending, retail sales performance and customer shopping patterns (into and out of an area) some of which cannot be independently validated with high levels of confidence.

In contrast, Deep End’s land use analysis focussed on a simple but transparent supply-demand analysis of supermarket floorspace as a key investigation method – rather than a series of complex escape spending formula or long term spending models (adopted by SGS) with unclear denominators of demand to calculate future needs.

The full details of Deep End’s findings specific to each historic retail assessment can be found at ‘Section 3.2’ of the Deep End Report, within **Attachment F**.

Strathalbyn Trade Area Statistics & Findings

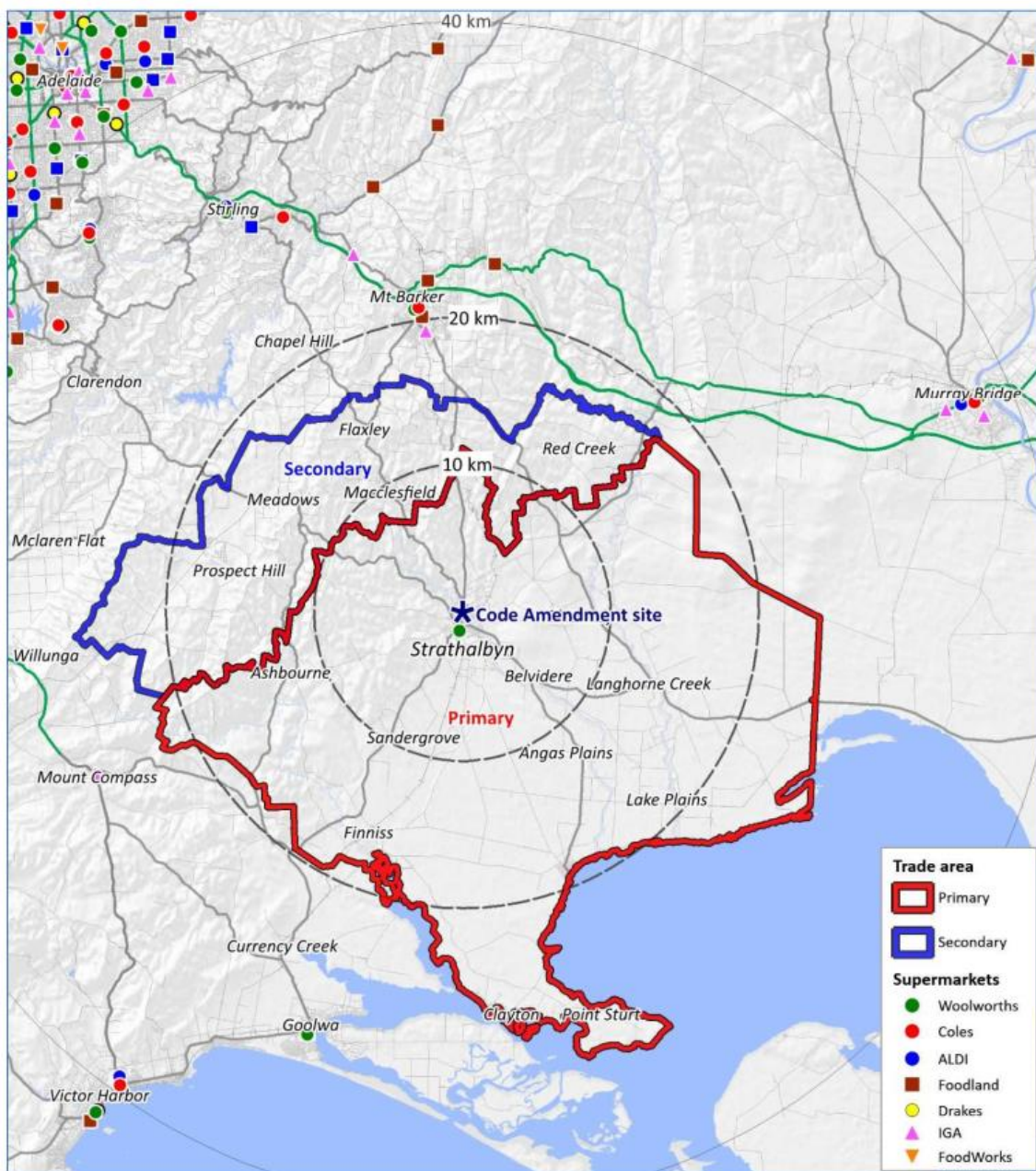
Strathalbyn has a unique town centre, comprising a retail core servicing an urban and rural catchment, and a second or complementary role with specialist retailers in a heritage precinct catering to a visitor market. Strathalbyn is a stopover for other attractions including the Langhorne Creek wine region, coastal townships and Lake Alexandrina. Visitation patterns are therefore complex and multifaceted.

In response to this, Deep End acquired and analysed a data set of detected mobile phone and tablet devices in the Strathalbyn town centre over a 2-month period between the 1 January and 28 February 2022.

This data assisted in capturing and identifying the distortion of people’s devices to an approximate location with Strathalbyn. The mapped data prepared by Deep End is separated into devices detected at both the Dawson Street precinct and the High Street precinct. Therefore it provided valuable insight into the breakdown of visitors between these precincts, rather than combining them. This data shows that:

- A different distribution of visitors to each precinct with a higher concentration of visitors (42% of the sample) to the Dawson Street (retail core) precinct originating from Strathalbyn and Alexandrina LGA compared to the tourist oriented High Street precinct (32% of its sample);
- The High St precinct recorded 40% of its detected devices originating from Greater Adelaide compared to 31% in Dawson Street; and
- Generally shows a high proportion of visitors from Adelaide in both precincts, which may also reflect the increased visitor/tourist levels experienced during January-February seasonal period.

Figure 4.2 Strathalbyn Trade Area (Source: Deep End)



Deed End found that the key distinguishing findings and features of Strathalbyn's trade area include the following:

- The primary catchment had an estimated 2021 population of 11,582 with just over 5,060 in the secondary catchment to the north – a total of 16,642;
- The projected increases in the trade area population (based on the 2019 SA Government forecasts) equate to 18,532 in 2026 and 20,157 in 2031;
- Within the primary catchment area, there is:
 - » A higher index of 'couples with children';
 - » An age structure similar to the SA Regional average with a higher proportion of aged people than the secondary catchments due to the aged care complex and retirees moving close to town services;
 - » Household income levels 4% above the Regional SA average. Incomes in the secondary catchment are significantly higher at +40%;
 - » A high proportion of mortgaged dwellings and low proportion of rentals;
 - » More tertiary educated residents and more white-collar workers reflecting the local health care and commuters to Adelaide;
- There is an average per capita spending level across the trade area on retail commodities and services is \$14,451 per annum, which is 5.9% above the Regional SA average;
- Spending on food, liquor & groceries (FLG) in the total trade area will increase from \$111.8 million to \$148.9 million in 2031 (\$2021);
- The growth in spending alone (+\$37.1m) would support over 4,400 sqm of new FLG floorspace in the trade over the 10 year period (at \$8,400 sqm per sqm applied to spending growth), irrespective of any existing deficiency or under provision of floorspace; and
- An increase in take away food and restaurant spending of +\$17.5m, and an increase in spending on non-food goods and services of \$25.6 million, over the next the 10 years. This would support about 5,100 sqm of new non-food and services floorspace (at \$5,000/sqm retail productivity).

Current provision of supermarkets in the trade area is limited to Woolworths in Strathalbyn, with only small 'mini-marts' or general stores located in the villages of Meadows and Macclesfield.

In 2016, Woolworths Strathalbyn expanded to the size it is today, and is a strong-performing store. In about 2019, a small IGA (or about 450 sqm) located in the 'Strathalbyn Shopping Centre' closed when the centre was sold. The Strathalbyn Shopping Centre appears to be currently under redevelopment for a small IGA (estimated at 700sqm) replacing the former IGA. IGA will provide a modest range of food and grocery lines and while adding to the supermarket floorspace, is not likely to materially change the choice or range of products or shopping formats available to local residents.

Escape Expenditure

Deep End analysed the level of expenditure that is lost outside of Strathalbyn, referred to as 'escape expenditure'. The estimated levels of escape expenditure has been compared with the estimates provided through the previous retail assessments. A summary of these estimates is provided in **Figure 4.3** below.

Figure 4.3 Escape Expenditure estimates (Source: Consultant reports, Deep End)

	Unit	Urbis (2013)	Essential Economics (2015)	SGS (2017)	Deep End Services (2022)
Year of analysis		2012	2015	2016	2021
Town Centre floorspace ¹	sqm	8,285	11,450	12,803	13,223
Average trading level	\$ sqm	5,536	6,010	7,507	6,629
Estimated turnover	\$m	45.9	68.8	90.9	87.6
Main trade area pop.	pop.	13,725	14,040	14,275	16,642
Spending per capita	\$ p.a.	12,925	14,573	-	14,451
Total spending market ²	\$m p.a.	177.4	204.6	178.7	240.5
Town Centre sales from MTA spending	%	87%	83%	100%	80%
	\$m	39.9	57.1	90.9	70.1
Escape spending from Strathalbyn	%	77%	72%	49%	71%
	\$m	137.5	147.5	87.7	170.4

¹ Urbis floorspace excludes High St precinct

² SGS spending market adjusted for on-line, tourists & workforce

The previous reports by Urbis and Essential Economics calculated a net level of escape expenditure from the main trade area (MTA) to centres other than Strathalbyn, within a close range of 77% and 72% respectively. In contrast, the 2017 report by SGS calculated a much lower figure at 49%, which Deep End conclude was as a result of SGS adoption of a much higher 'sales per sqm' level for existing Strathalbyn retailers and assumed all sales in the town centre were from residents within the trade area.

Deep End estimated 71% escape expenditure, which equates to approximately \$170.4 million (in 2021 dollars). This is closely aligned with the Urbis and Essential Economics estimates. Deep End outlined that a high-level estimate of escape spending is treated with caution and only indicative of the overall flows of spending to and from an area. Other small towns are acknowledged in the trade area and will retain some local spending however their locations on the edge of the catchment mean they also draw on residents outside the spatial area. Village retailers have lower turnover levels and are aligned to the Adelaide Hills tourist and visitor trade. A certain level of escape spending will also naturally and indefinitely occur from small to mid-sized regional markets.

Deep End conclude that in addition to providing additional retail land supply, in terms of improving the current escape expenditure situation, over time a growing regional centre such as Strathalbyn should aim to provide:

- *Opportunities for new retailers to enter the market in response to increasing population levels.*
- *Opportunities to attract new retailers which, in turn, create local employment opportunities and potentially reduce the time and travel costs for residents who may otherwise drive outside the area to shop.*
- *The widest available choice and range of retailers in daily and weekly consumed items such as food and groceries. As food and groceries make up almost 50% of a household's annual spending budget, choice and competition in the market can improve standards and reduce weekly grocery bills.*
- *Greater width and depth in specialty non-food categories and services, noting that even small additions or new competition in some categories can significantly improve residents' choice and satisfaction.*

Demand for types of Retail floor areas & effect on existing centres

Deep End outlined that in determining the suitability of the Affected Area to accommodate retail and other uses, an outlook over a 10 year timeline should be adopted. Key drivers behind the additional need and demand for new floorspace in Strathalbyn will be:

- Population growth and the expanding boundaries of the township;
- The level of visitor growth;
- Low rates of retail floorspace provision which can give rise to growing dissatisfaction about the lack of choice or a monopoly position enjoyed by some retailers; and
- Rising congestion & travel costs (as exacerbated more recently with record fuel prices) to access retailing in Mt Barker or greater Adelaide.

The continued development of the Affected Area addresses a growing question of where and how Strathalbyn will meet the growing needs of a population approaching 10,000 with the development of committed and future housing areas.

Deep End emphasise that *'if the opportunity is deferred, the alternative may be a more remote location where its viability will be harder to prove and timing put off into the long term'*.

Key findings of the Deep End's investigations in relation to the retail demand are summarised below:

- The current level of retail floorspace in the main trade area is approximately 1.0 sqm per capita, and without any additions to current supply, this rate will fall to 0.83 sqm per capita by 2031;
- A reasonable increase in the rate of retail floorspace provision of 0.2-0.3 sqm per capita would justify 3,700-5,600 sqm of retail floorspace by 2026 and 4,000-6,000 sqm by 2031; and
- A 15% reduction in escape spending can be readily achieved through the Code Amendment, with a forecasted additional 20% demand coming from residents outside the catchment (including visitors), could support approximately 7,900 sqm of new retail floorspace in 2026 rising to 9,000 sqm by 2031.

Deep End assessed the provision of different types of retail and commercial offerings within the trade area and Strathalbyn township. In addition, and as mentioned earlier, it was noted that previous reports focussed on quantifying levels of escape spending and in some cases, opaque models of retail spending and retail supply and demand calculations. A more relevant analysis given the purpose of the Code Amendment and key driver of the development is a specific supermarket need assessment.

In addition to assessing the appropriate scale of a supermarket based on existing and future demand, Deep End provided recommendations on the specific retail and commercial land uses that are needed to contribute to satisfying the strong demand within the trade area, including the relevant GFA for each. **Figure 4.4** below provides a summary of these recommended land uses.

Figure 4.4 Land use & area recommendations (Source: Deep End)

Land use	GFA (sqm)	Site area (sqm)
Supermarket	2,500	
Shops (10-12)	1,500	
Small showrooms (3-5)	1,500	
Office / commercial	800	
Child care	500	
	6,800	26,500
Pad sites		
Franchised food + drive through	250	2,500
Fuel station & c-store (long term)	250	2,500
Separate office (vet, dental)	200	700
Total all uses	7,500	32,200

As mentioned earlier, Deep End assumed re-opening of the IGA within the town centre, albeit with a larger floor area of approximately 700 sqm. This addition of a 700 sqm small scale supermarket will provide a modest range of food and grocery lines and while adding to the supermarket floorspace, but is likely to materially change the choice or range of products or shopping formats available to local residents. The IGA will not provide effective competition to a 3,500 sqm Woolworths that a growing Strathalbyn requires in the longer term.

The calculated underlying demand level equates to a current rate of 0.46 sqm per capita, and is slightly higher than the Adelaide metropolitan average of 0.41 sqm per capita. This calculated rate is for branded supermarkets and excludes minimarts and general stores.

On the assumption that the rate remains constant, Deep End conclude that the demand level for supportable supermarket floorspace grows from 7,900 sqm in 2022 to 9,330 sqm in 2031.

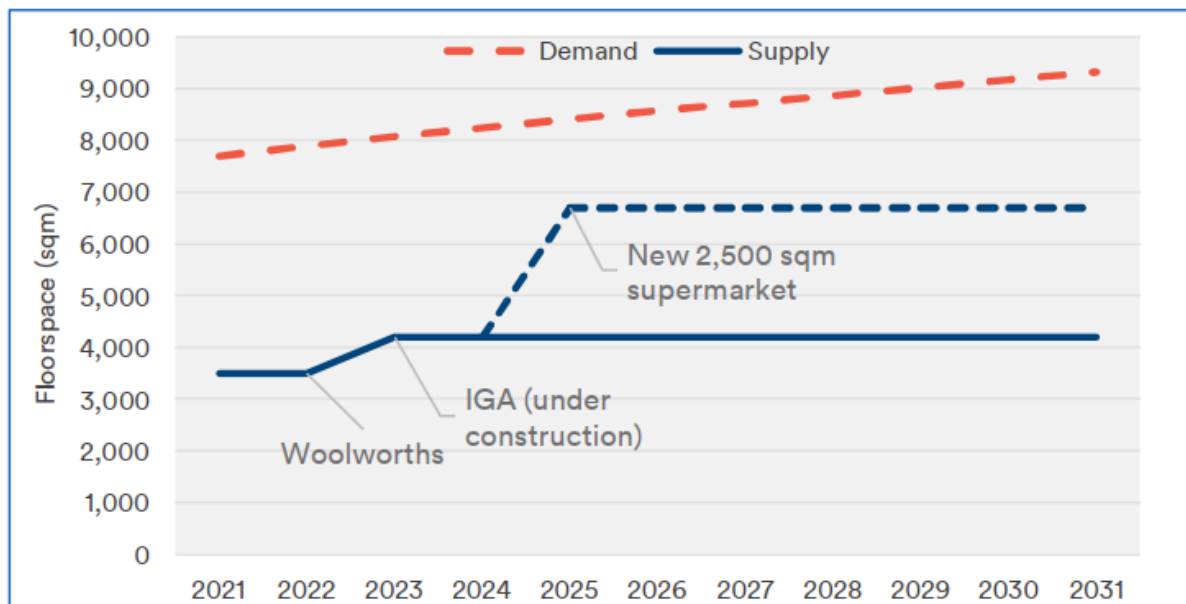
Within Strathalbyn, the current supermarket supply (which comprises the Woolworths at 3,500 sqm) represents just 44% of the trade area demands. Assuming the small IGA in Strathalbyn opens in 2023, then supply levels will still be about 50% of the theoretical demand.

The Code Amendment seeks to rezone land within the Affected Area to facilitate the development of a 2,500 sqm supermarket, which is currently a 'restricted' form of development within the existing 'Hills Neighbourhood Zone'. The introduction of a supermarket of this size, would raise the supply / demand ratio to 80%, as per Deep End's analysis.

The residual supermarket demand (20% in 2025 falling to 28% in 2031) is an acceptable, if not efficient, level of externally supported floorspace which allows for residents of the secondary catchment shopping in Mt Barker or those in the south gravitating to Goolwa.

Figure 4.5 below demonstrates this demand against anticipated supply. It is evident that even with the mooted IGA and potential development of a new 2,500 sqm supermarket within the Affected Area, there is substantial residual demand for the next 10 years, with the gap between demand and supply increasing to 2031.

Figure 4.5 Supermarket floorspace supply – demand analysis (Source: Deep End)



Regarding complimentary land uses, Deep End provided recommendations and analysis relating to the other uses outlined in **Figure 4.5** above. These are summarised as follows:

- *Specialty shops and services*: a small range would be a valuable addition complementing the supermarket. The average number of specialty shops in supermarket-based centres nationally is about 20. However in this setting, a range of 10-12 shops could be considered noting that a pharmacy is

proposed in the adjoining approved medical centre and the OTR development will have some franchised food outlets. Other regional examples at Nairne ('Chapmans') and Mt Barker/Aston Hills ('Drakes') comprise supermarkets similar to the 2,500 sqm GFA demand for the Affected Area. These centres comprise 10 and 13 specialty shops respectively.

- *Franchised food:* Adelaide Road's exposure comprises high traffic levels into and out of Strathalbyn, and presents an opportunity for a potential pad site for a franchised food operator. Strathalbyn is approaching the size where major operators will be looking to secure a location within the township, as evident in other regional towns of Nuriootpa, Renmark, Kadina and Naracoorte. The requirement for a franchised food outlet with drive-thru and parking is about 2,500 sqm although efficiencies may be gained if co-located with other uses.
- *Retail Fuel outlets:* The proposed OTR on Braemar Drive and recent development of a BP fuel and truck stop and car wash on South Terrace reduces short term demand for another fuel site. Notwithstanding with a longer-term outlook for the Affected Area, a portion of the land could be future proofed for retail fuel outlet, which would comprise a land area of approximately 2,500 sqm.
- *Specialised uses:* A number of small, specialised uses that often prefer a stand-alone building with directly adjoining car parking and main road exposure could be considered for a small pad site. Examples include a vet or dental practice. These would typically take up no more than 700-800 sqm.
- *Child care centre:* With 750 '4 year old children' estimated through the 2021 Census and 195 registered child care places (provided within the existing 3 child cares within Strathalbyn), Strathalbyn has a current provision rate of 3.8 children per registered place. Strathalbyn's provision is lower (that is more children per place) than the Adelaide average (2.5 children per place) and the regional average of the surrounding local government areas of Alexandrina (excluding Strathalbyn), Mt Barker, Murray Bridge, Victor Harbor and Yankalilla (3.0 children per place). The addition of a child care centre of around 80 places in Strathalbyn by 2026 would see the provision rate increase to 3.0 children per place. This suggests a fourth child care centre of about 80 places could be supported within the Affected Area (or within Strathalbyn) in the next 5 years.
- *Small showrooms:* Based on existing and future demand, Strathalbyn could support a small provision of showroom space suited to various retail and trade supplies operators, comprising floor areas between 250-400 sqm. Up to 4-5 tenancies could be developed within the Affected Area with a total area of 1,000 to 1,500 sqm.
- *Office/flexible commercial space:* Within Strathalbyn, and adjacent to the town centre, a number of existing dwellings have been converted to small offices. There are little available/vacant tenancies at present, indicating a tight market and limited opportunities for modern office space. There is also strong growth in fitness, health and wellbeing, but there are currently no commercial gyms in Strathalbyn, however it is noted that one is currently under development within the Affected Area (on Allotment 12).

In terms of to what level of impact (both positive and negative) the proposed rezoning of the Affected Area and subsequent development of a small supermarket and other complimentary retail and commercial uses will have on the Strathalbyn retail centre(s), Deep End conclude that the fear or perception of any impacts is relatively mitigated as follows:

- *There has been little or no growth in Strathalbyn's retail floorspace for many years. Some businesses will have enjoyed the benefits of the town's steady long term population growth and limited new competition over many years. Some will be in a strong position to absorb a short-term sales impact.*
- *The supermarket floorspace would be a 70% increase on the existing supply however the 10-12 shops would be a 9-14% increase on the retail area of all other shops in Strathalbyn. This is a relatively small increase in the context of the town's past and future growth. Dawson Street will remain the dominant retail area of the town.*
- *Small to moderate impacts can be recovered by good retailers through underlying spending growth in the area.*
- *A new centre will bring more people from the surrounding area who will shop more often, increasing the overall spending available to the town. Strong Town Centre retailers will capitalise on this opportunity.*
- *The Town Centre will still be a larger and more compelling offer with upgraded streetscapes and amenities, the added attraction of surrounding community and civic infrastructure and the visitor market to the central gardens.*
- *There are numerous examples of where regional cities have taken steps to increase their commercial space to meet growing needs, often in areas beyond the traditional town centre because of planning or physical limitations. Strathalbyn (and Alexandrina Council) will eventually need to address the issue of a looming shortage of supermarket space. The Affected Area is relatively close to the Town Centre which maximises the opportunity for cross-shopping between the areas.*

With respect of the benefits to be obtained from the Code Amendment, and development of a secondary small-scale supermarket based activity centre, Deep End conclude the following:

- *The site addresses a growing question of where and how Strathalbyn will meet the retail needs of its current and future population. The committed and other zoned residential growth areas of the town will raise the population to 10,000 people. Most other comparable-sized towns in Australia of this size have multiple competing supermarkets;*
- *A second competitive supermarket will raise the rate of supermarket floorspace provision to an acceptable level without creating an oversupply;*
- *New competition from a well-credentialed independent will bring better choice, improved competition and potentially better prices and new product ranges where independents can source product directly from small growers and suppliers;*
- *The centre design could be in keeping with the contemporary character of the new housing and a point-of difference to the well preserved heritage elements of the town;*

- *The centre can be staged with different elements added over time. This will also soften the impacts on other retail, fuel or quick service food operators; and*
- *It will consolidate this area (being the Affected Area) as a gateway to the town and focus for the northern residential areas including the 123 new house blocks within 800 metres of the site.*

The proposed retail and commercial uses are estimated to generate approximately 279 full and part time employment positions, in addition to those already generated by the approved developments along Braemar Drive.

Policy Response to Retail and Economic Investigations

The Affected Area is well-located and ideally sized for the establishment of a new small-scale supermarket based activity centre.

Following a review of the existing 'Township Main Street Zone' within Strathalbyn's town centre, it is evident there are no available sites to accommodate a competitive supermarket. Therefore on a sequential approach, the Affected Area is the most logical and optimum location for a new 'supermarket-based' activity centre because:

- *It is close to the growing northern areas of the township and can provide a convenience option for many new and future residents within 800m of their homes.*
- *Adelaide Road is the main arterial road where most commuter and visitor traffic enter and leave Strathalbyn. It is a key link to the rapidly developing area of Mt Barker where there will be growing work and economic interactions with Strathalbyn.*
- *It is the closest location that a centre of this type could establish outside of the Township Main Street Zone. At its closest point, the road distance from the Affected Area is 400 metres to the northern edge of the High Street precinct and 1km to the edge of the Dawson Street commercial area. Once of course, a decision is taken to accommodate a major retailer outside any centre, the distance relationship is probably of limited significance however the distance is still relatively short and will allow cross-shopping between the two areas. At Goolwa, the distances from the Goolwa Shopping Centre (Woolworths and Foodland) to the beginning of the old village centre on Cadell Street is a similar 600 metres. These two centres appear to have developed their own complementary role and character.*
- *A new centre on Adelaide Road will sit well with the new housing and future estates still to come on the north side of Strathalbyn. The new and old centres of Strathalbyn are distinguished by their own character and retailers.*
- *The recent approvals for a medical centre, pharmacy, gym, child care, fuel site and child care will establish a commercial focus on part of the Affected Area and adjoining it. The establishment of an activity centre between these uses and 125 new homes to the north is consistent with the land use transition and development of the area.*

The 'Local Activity Centre Zone' provides an appropriate policy framework to support the findings of the investigations performed by Deep End Services. In particular the rezoning will facilitate development of a local activity centre which will perform as a 'secondary retail node' to the Strathalbyn Town Centre. The land uses identified by Deep End, comprise small scale shops and other facilities which seek to provide a convenient and walkable centre to serve the surrounding community. It will also provide a convenient option for commuters along Adelaide Road and seeks to minimise escape expenditure for the Strathalbyn township.

Deep End concludes that this Code Amendment to rezone the Affected Area to a 'Local Activity Centre Zone' and its policy controls *"appears well-suited to the Affected Area. It will facilitate a local activity centre which is a secondary retail node to the Strathalbyn Town Centre. The recommended uses are small scale shops and other facilities which provide daily services to a walkable area and a broader local community."*

In particular, a local supermarket based centre is considered consistent with Desired Outcome 1 of the 'Local Activity Centre Zone', along with the potential for other complimentary and convenience based uses such as a medical consulting rooms and gym (both currently under construction within the Affected Area), a small provision of showroom-type uses, offices and future restaurant and fuel outlet.

It is noted that the proposed Local Activity Centre Zone does not have a mechanism to provide for a maximum retail floor area cap that would limit future retail uses on the site. The overarching intention of this Code Amendment is to facilitate the ability to development part of the Affected Area for purposes of a small supermarket of with a GLA of up to approximately 2,500 sqm. Importantly, the size and spatial composition of the Affected Area and the use of proposed 'Concept Plan 'X' - Strathalbyn North Local Activity Centre' will limit future development potential to that of a 'local activity centre'.

4.6.3 Traffic and Access

The 'Transport Investigations Report' prepared by CIRQA (**Attachment F**) considers the forecasted traffic generation associated with the proposed rezoning and redevelopment of the Affected Area, the associated impact on the adjacent existing road network, active and sustainable transport provisions and consideration of potential infrastructure provisions and upgrades.

CIRQA's assessment considers the context of an 'ultimate development' scenario, where the Affected Area is fully developed, and the associated traffic generation from various potential retail and commercial land uses (as prescribed within the Deep End report).

CIRQA also considered within their assessment, the potential for future development (and relevant access/traffic implications) to be undertaken via the recent development approvals at 'Allotment 12 Braemar Drive' (mixed use development comprising a medical centre, allied health centre, gym and a pharmacy) and 'Allotment 508 Braemar Drive' (a retail fuel outlet, which includes drive-through restaurants and a car wash).

Access Arrangements and Infrastructure

The requirements for vehicle access into the Affected Area were influenced by the types and scale of the land uses identified by the Deep End report, and the approved land uses on 'Allotment 12 Braemar Drive' and 'Allotment 508 Braemar Drive'.

CIRQA considered that the most appropriate form of access into the Affected Area is via Adelaide Road, as it would mitigate any potential traffic impacts associated with the traffic generated by the Affected Area. This access would generally comprise channelised left-turn and channelised right-turn treatments (i.e. separated lanes) on Adelaide Road. Similarly within the site, separated left and right turn lanes could be provided at the access (via a high-angle left-turn lane from the site onto Adelaide Road).

In addition to this primary access point, a secondary access point would be appropriate from Adelaide Road, in the form of a 'left-in only' arrangement. This secondary access point would assist in providing convenient access to potential pad sites adjacent the intersection of Adelaide Road and Braemar Drive.

In addition, CIRQA recommends that future development of the Affected Area would need to consider the internal road layout, to reduce the likelihood that the Adelaide Road access point(s) could be utilised as a 'cut-through' route between Adelaide Road and Hampden Way.

The primary access from Adelaide Road would also act as the most appropriate access for commercial vehicles, and these access points should be designed in the future to accommodate these types of vehicles.

In terms of Allotment 11, future vehicle access should be provided via a two-way access shared with Allotment 12. By doing so, this access would be suitably located midway along the Braemar Drive interface, on the outside of a minor curve, and maximises the separation to adjacent intersections and maximises sightline provisions.

CIRQA recommends that the location of all access points proposed should ensure that appropriate separation is provided between each access point, and adjacent intersections (such as the Adelaide Road/Braemar Drive and Braemar Drive/Hampden Way roundabouts) in line with the requirements of the Planning and Design Code and relevant Austroads Guidelines.

Traffic Generation and Distribution

As mentioned earlier, CIRQA's assessment assumes an 'ultimate development' scenario, where the Affected Area is fully developed, and the associated traffic generation from the potential floor areas and land uses identified within the Deep End report. Future traffic volumes have typically been forecast using rates adopted from various traffic literature and associated traffic data.

CIRQA have therefore adopted the following traffic generation rates for purposes of the traffic impact assessment:

- Supermarket and shops - 4.5 am and 9.0 pm peak hour trips per 100 m² of gross floor area;
 - » The NSW Roads and Maritime Services' "Guide to Traffic Generating Developments" (the RMS Guide) identifies a peak hour (Thursday) traffic generation of 12.3 peak hour trips per 100 m²

of gross leasable floor area for shopping centres with a total floor area between 0 and 10,000m². However, such a rate is not considered to be appropriate for application to the subject proposal's retail component. In reality, it would be expected that the retail component would generate in the order of 7.5 to 9.0 pm peak hour trips per 100 m² of floor area. Such rates have recently been adopted (and accepted) for various retail shops throughout metropolitan Adelaide;

- » It should also be noted that the am peak hour generation of 'shops' is typically 50% of that associated with the pm peak hour.
- Retail showrooms/Bulky goods – 2.7 am and pm peak hour trips per 100 m² of gross floor area;
 - » As specified by the RMS Guide Technical Direction Update;
- Office – 1.6 am and 1.2 pm peak hour trips per 100 m² gross floor area;
 - » As specified by the RMS Guide Technical Direction Update.
- Fast-food restaurant – 91.5 am and 183 pm peak hour trips per site;
 - » The RMS Guide identifies traffic generation rates for various fast-food restaurants however, such rates are based upon data collected prior to the document being published in 2001. More recently (2016), the RMS commissioned Bitzios Consulting to review the traffic generation rates associated with fast-food restaurants. Bitzios Consulting identified a traffic generation rate of 183 pm network peak hour trips to be applicable to McDonald's fast-food restaurants (the highest traffic generating fast-food restaurant surveyed). While a specific brand/franchise of fast-food restaurant has not yet been determined, the rate applicable to McDonald's restaurants has been adopted for the purposes of the subject traffic impact assessment as it is the highest rate of all fast-food restaurant franchises. Adoption this rate therefore provides a conservative assessment of a traffic impact assessment.
 - » While an am peak hour rate was not identified by Bitzios Consulting, it has been assumed that approximately half of the pm peak hour will be generated during the am peak hour (i.e. 92 am network peak hour trips has also been assumed);
The Bitzios Consulting study also identified an applicable passing trade in the order of 50% of the use's forecast traffic generation (i.e. 50% of the movements forecast are existing movements already using the adjacent road network).
- Medical Centre/Consulting rooms – 10.4 am and 8.8 pm trips per 100 m² gross floor area;
 - » The RMS Guide does not identify traffic generation rates applicable to standard consulting rooms, however does identify rates applicable to medical centres. Accordingly, the associated medical centre traffic generation rates have been applied to both medical and consulting room uses;
- Fuel station and convenience – am peak hour trips = $0.2815(X2^2) + 14.047(X2) + 16.715$; and pm peak hour trips = $0.0205(X1) + 88.52$;

- » *An update to the RMS Guide's petrol filling station traffic generation rates was prepared by TEF Consulting for the RMS in 2013. The updated study identified that the previously recommended rates were based on data from 1979 and that the operation and nature of petrol filling stations has changed significantly since that time. Based on detailed statistical analysis, the update report recommended the above rates for assessment of traffic generation at petrol stations during the road network peak hours (where X1 is the total site area in m² and X2 is the number of service channels); and*
- » *In addition, it is commonly accepted that in the order of 70% of vehicle trips associated with petrol filling stations are related to passing trade (i.e. vehicles already on the adjacent road network).*

Based on the rates identified above and the current approved developments within Allotments 12 (within the Affected Area) and 508 Braemar Drive, CIRQA concluded the following traffic volumes would be generated by the Affected Area and existing approved development sites:

- **Allotments 11, 13, 14 & 20** – 457 AM and 754 PM peak hour trips (124 am and 189 pm 'passing trade' vehicle movements);
- **Allotment 12** - 93 AM and 93 PM peak hour trips; and
- **Allotment 508** – 148 AM and 267 PM peak hour trips (102 am and 185 pm 'passing trade' vehicle movements).

This equates to a total forecast of 697 AM and 1,109 PM peak hour trips within an 'ultimate development scenario' of the Affected Area. CIRQA notes that of the total peak hour movements, 226 AM and 375 PM movements would be attributed to 'passing trade' vehicle movements that are already utilising the adjacent road network (i.e. not considered additional vehicle movements).

CIRQA also assumes the following high-level traffic distribution for the purposes of the assessment:

- *North – 25% of total vehicle movements to/from the north (residential areas, Long Valley Road and/or Strathalbyn Road);*
- *East – 10% of total vehicle movements to/from the east (residential areas, Callington Road and/or Langhorne Creek Road);*
- *South – 55% of total vehicle movements to/from the south (residential areas, Millang Road and/or Alexandrina Road); and*
- *West – 10% of total vehicle movements to/from the west (residential areas, Paris Creek Road and/or Ashbourne Road).*

Traffic Impacts and future parking provision

A traffic survey and SIDRA modelling of the adjacent road network was undertaken in July 2022, and included the Adelaide Road/Primary Site Access and the Adelaide Road/Braemar Drive/East Terrace roundabout.

CIRQA advised that SIDRA modelling has not been undertaken for the potential secondary access points along Adelaide Road or Hampden Way as it is anticipated that these future traffic volumes (in the ultimate

development scenario) would be 'very low'. In addition SIDRA modelling was not undertaken on access points for Allotment 12 and Allotment 508, given these access provisions were already assessed and subsequently approved via the respective development approvals.

With respect of the primary access to the Affected Area, via the Adelaide road access point, CIRQA conclude that this access will function satisfactorily in an 'ultimate development scenario':

Specifically, the access will readily accommodate envisaged traffic volumes, with minimal impacts upon the operation of Adelaide Road. While minor delays may occur (during peak periods) for drivers undertaking a right turn from the site, queues will be accommodated entirely within the Affected Area, thereby limiting the site's potential impact.

The SIDRA modelling and analysis of the Adelaide Road/Braemar Drive/East Terrace roundabout (assuming its current configuration i.e. no upgrades proposed) was undertaken using both a 'base case' scenario and a 'total traffic' scenario, to compare the changes in traffic volumes between the current condition and an 'ultimate development scenario' across the Affected Area. CIRQA subsequently conclude that the roundabout will suitably accommodate the 'total traffic' scenario, and make the following comments:

Similarly, modelling of the future 'total traffic' scenario also identifies that the volumes will be readily accommodated, with the Degree of Saturation (DoS) associated with any given turning movement, well below acceptable limits.

Comparing the 'base case' and 'total traffic' scenarios, the data identified in Table 3 indicates negligible increase to delays experienced at the intersection. Specifically, delays are not forecast to increase by more than two (2) seconds for any turning movement. As such, it is expected that the roundabout will continue to operate satisfactorily in the event that full development yields of the Affected Area are realised (in conjunction with the development of Allotments 12 and 508).

In relation to vehicle parking within the Affected Area, it is anticipated that all on-site parking should be provided in accordance with the requirements of 'Table 1 – General Off-Street Car Parking Requirements' of the 'General Development Policies - Transport, Access and Parking' of the Code.

Consideration may also be given to a number of factors which may reduce parking provisions including (but not limited to) shared-use/shared-trips, accessibility of public transport services, surrounding active transport networks and associated connectivity.

It is important to note that the investigations performed for the purposes of this Code Amendment are limited to identifying and evaluating the various options available in relation to access for the Affected Area.

Notwithstanding, the analysis conducted by CIRQA confirms that from a traffic perspective, the allotments within the Affected Area are all capable of being accessed and the volumes of traffic generated by a future 'ultimate development scenario' can be readily accommodated within the surrounding road network without impacting on adjacent residential areas within the locality.

Policy Response to Transport Investigations

The 'Traffic Generating Development Overlay' will be applied to the whole of the Affected Area, and includes provisions intended to manage the impacts of traffic movements on adjacent urban transport routes.

The traffic assessment performed by CIRQA suggests that the requirements of the 'Traffic Generating Development Overlay' are capable of being addressed.

The 'Urban Transport Routes Overlay' is also proposed to apply to the whole of the Affected Area, and includes potential requirement for referral to the Commissioner of Highways for development that creates a new access, alters the nature (and/or frequency of vehicular movements) through an existing access, to Adelaide Road (as a 'state maintained road').

The proposed 'Concept Plan 'X' - Strathalbyn North Local Activity Centre' provided within **Attachment C**, includes indicative locations of primary and secondary access to guide future development within the Affected Area.

4.6.4 Native Vegetation Investigations

EBS Ecology (EBS) performed a Desktop Assessment and Field Survey of the Affected Area to determine the potential implications of the Code Amendment on existing native vegetation. A field survey was undertaken on the 21st June 2022. A summary of the EBS advice is provided within **Attachment F**.

EBS found that there is no vegetation covered by the *Native Vegetation Act 1991* within the Affected Area.

An area of revegetation (**Figure 4.6** and **Figure 4.7**) was located along the creek line which comprises local native species, however, as they have been planted and are not associated with an offset (under the *Native Vegetation Act 1991*) this vegetation is exempt from the provisions of the *Native Vegetation Act 1991*.

Figure 4.6 *Vegetation located within the Affected Area*



Figure 4.7 Area of revegetation along creekline within the Affected Area



Three large trees, adjacent to the revegetation area, were also inspected (as circled in red in **Figure 4.7** above). All three trees were identified as *Eucalyptus cladocalyx* (Sugar Gum) which are not a local species to the area and have been planted. Therefore, these trees are also exempt for the *Native Vegetation Act* 1991. The remainder of the area is cleared agricultural land dominated by exotic grasses.

Policy Response to Native Vegetation Investigations

EBS have identified that no native vegetation is present within the Affected Area.

It is noted that despite there being no native vegetation within the Affected Area, the 'Concept Plan 'X' - Strathalbyn North Local Activity Centre' prepared has been proposed in a manner which seeks to provide open space in the locality of existing vegetation. The open space and stormwater basin is proposed to be located within the north-west corner of the Affected Area. Therefore there may be the ability to retain some of this revegetated area, subject to detailed design of the future stormwater basin.

The proposed Code Amendment will also retain the 'Native Vegetation Overlay^{1*}' across the whole of the Affected Area.

¹ *The Overlay also includes a referral trigger to the Native Vegetation Council for development proposing the clearance or potential clearance of particular types of native vegetation (i.e. 'Level 3' and 'Level 4' clearance).

4.6.5 Services and Infrastructure

The *Infrastructure Report* prepared by Greenhill Engineers addresses the infrastructure and servicing requirements for the Affected Area, accounting for the intended use of the land for commercial purposes. In addition, Tonkin Consulting have undertaken a stormwater management review of the Affected Area in conjunction with the residential land division approved the north. These reports are provided within **Attachment F**.

Servicing Requirements

The infrastructure and servicing requirements for the Affected Area is addressed in Section 4.5 of this Code Amendment. The investigations conducted by Greenhill confirms that the Affected Area is capable of being serviced by existing services and infrastructure, including sewer, mains water, electricity, gas and telecommunications infrastructure.

Road Access Requirements

The Greenhill report assumes access could be provided from all three road frontages. Some of these access points have already been approved, such as the medial centre (and gym) for Allotment 12.

Adelaide Road is under the care and control of the Department for Infrastructure and Transport (DIT), with Hampden Way and Braemar Drive are under the care control and management of Alexandrina Council.

Greenhill outlined that any future traffic management treatments to facilitate access in and around the Affected Area, is best addressed through the separate traffic assessment by CIRQA. The detailed traffic assessment has been prepared by CIRQA, and discussed previously in **Section 4.6.3** of this Draft Code Amendment.

Flooding and Watercourse Assessment

Tonkin Consulting (Tonkin) have undertaken a preliminary drainage advice and review across the Affected Area, in conjunction with the residential land division to the north. It is noted that Tonkin are also the project engineer for the residential land division in regard to stormwater and civil infrastructure advice.

The Affected Area generally falls from East to West, on the western side of the site is North Creek, which runs parallel to Hampden Way and crosses Hampden Way within the north-western section of the Affected Area as

In addition to an assessment against the Native Vegetation Overlay, the removal of native vegetation would be subject to Native Vegetation Clearance Application under the *Native Vegetation Act 1991* (the 'NV Act'). The removal of native vegetation would also be subject to a Significant Environment Benefit (SEB) offset and/or payment into the Native Vegetation Council Fund.

demonstrated in **Figure 4.8** and **Figure 4.9** below. At the time of preparation of the advice from Tonkin engineers, the Affected Area was wholly undeveloped, with well-maintained grass.

Figure 4.8 Angus and North Creek Alignments

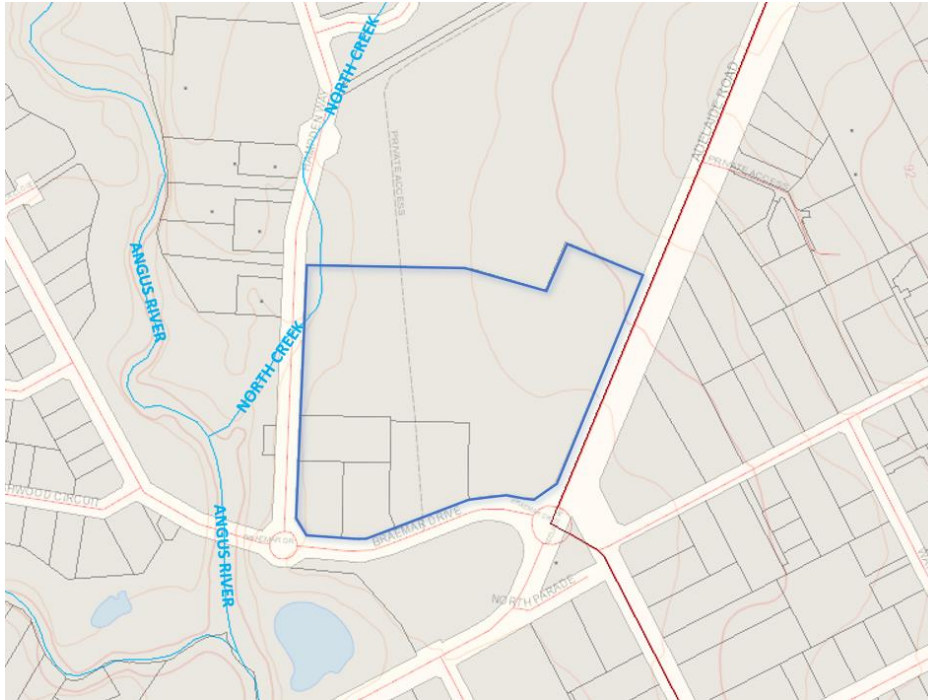


Figure 4.9 Site Layout (Source: Tonkin Consulting)



Past this point, North creek is directed to the opposite side of Hampden Way via box culverts before eventually joining the Angas River. North Creek is a tributary of the Angas River and has been modelled previously by Tonkin as a part of the 'Strathalbyn Proposed Residential Site Lot 4 Stormwater Management Plan', and a copy of this plan has been attached to the Tonkin advice at **Attachment F**.

For this Code Amendment, Tonkin assume a post development scenario of approximately 95% impervious surface area across the Affected Area, with the remaining area available for the major stormwater infrastructure, namely the detention basin to manage any additional site run off.

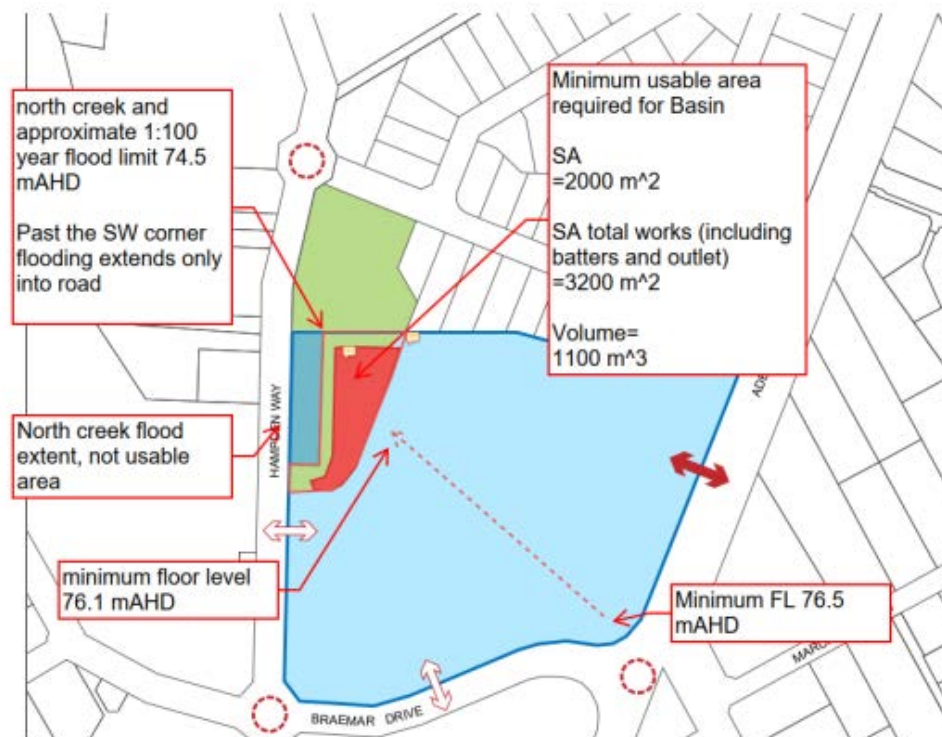
The northern residential development has its own stormwater network and manages major flows through the existing road network and a detention basin located to the immediate north west of the Affected Area. Tonkin outline that flows from this residential development will not be conveyed through Affected Area as a result.

The Affected Area sits adjacent North Creek, which has been previously reported as servicing 7 square km and conveying an external 1% AEP flow of 10 m³/s. The flood plain as a result of the 1% annual exceedance probability (AEP) flows from this creek were assessed as part of the existing stormwater management plan for the northern residential development. This plan determined that flood level in the area around the culverts under Hampden Way equates to approximately 74.5 m AHD, the approximate extent of the area required for the North Creek flood plain under these conditions is shown and annotated in **Figure 4.9** above.

In relation to stormwater and flooding management adjacent to, and within the Affected Area, Tonkin conclude that:

- In order to maintain the existing functionality of North creek, no construction should occur within the flood plain adjacent the creek to ensure there is no worsening of flooding to anyone downstream of the site;
- To manage additional flows resulting from the increased development, a 1,100 cubic metre basin will be required. For an average 1 m deep basin, this is expected to equate to between 2,000 – 2,300 sqm of area (depending on batter slopes being 1:4 – 1:6 and having an allowance of 20% for shaping). In addition to this area, an additional 1,200 sqm will be required to build up the western wall of the basin along the edge of North Creek. The approximate land requirement of a basin with 1:4 sides, the undeveloped area for North Creek and the required area for the western basin wall is outlined in **Figure 4.10** below.
- Future minimum floor level for development (near to North Creek), and the top of the basin should be set to 76.1m AHD, this will allow the activity centre development to be outside and above the 1% AEP storm event flooding extents. It is noted that the worst-case water level within the basin was modelling to be 75.8m AHD (allowing for 300 mm freeboard);
- The detention requirements in both the minor and major storm events will need to be managed by an outlet structure which should be considered in further detail during future detailed master planning for undeveloped portions of the Affected Area. This is proposed to be achieved either through a weir within the basin, or a custom weir pit adjacent the basin, depending on space requirements; and
- The outlet would be able to discharged either directly to North Creek adjacent the basin, or under Hampden Way, depending on the final basin orientation during future detailed design.

Figure 4.10 Detention space requirement (Source: Tonkin Consulting)



Policy Response to Servicing and Infrastructure Investigations

The 'Water Resources Overlay' to be applied to the north-western portion of Affected Area includes provisions which seek to ensure development is designed to minimise impact on watercourses, including existing hydrology for the 1% Annual Exceedance Probability (AEP).

In addition to the 'Water Resources Overlay', the 'Hazards (Flooding – Evidence Required) Overlay' and 'River Murray Tributaries Protection Overlay' will also be maintained for the Affected Area. These Overlays include policy to ensure development is designed to mitigate potential impacts of flooding on people, property, infrastructure and the environment, and ensures the conservation of riverine environments within the River Murray Tributaries area.

The proposed 'Concept Plan 'X' - Strathalbyn North Local Activity Centre' provided within **Attachment C**, seeks to retain a large portion of the Affected Area for purposes of open space/stormwater management. This will ensure that surface water collected across the Affected Area will be appropriately managed and water quality enhanced. In addition, the retention of this portion of the site as part of the stormwater management strategy will ensure future development is located outside of a small area prone to flooding from nearby North Creek.

4.6.6 Aboriginal Heritage Assessment

Ekistics performed a request to Aboriginal Affairs and Reconciliation (AAR) to undertake a search of the central archive, which includes the Register of Aboriginal Sites and Objects (the Register) for entries for Aboriginal sites within the Affected Area.

The search revealed that there are no entries for Aboriginal sites at this location.

In the absence of known Aboriginal heritage sites within the Affected Area, a Ministerial authorisation to impact heritage under Section 23 of the *Aboriginal Heritage Act 1988 (the 'AHA')* is not required. However, this does not obviate any future responsibilities if unknown Aboriginal heritage sites are revealed during any future development works.

All Aboriginal sites and objects are protected under the AHA, whether they are listed in the central archive or not. Land within 200 metres of a watercourse (for example the River Murray and its overflow areas) in particular, may contain Aboriginal sites and objects.

Policy Response to Aboriginal Heritage Assessment

In-light of the above, the findings of the aboriginal heritage search and investigations, do not preclude the rezoning to the 'Local Activity Centre Zone'.

4.6.7 Environmental Noise Investigations

The Code Amendment considers the proposed rezoning of the Affected Area from a residential zone (Hills Neighbourhood Zone) to a zone where commercial development is the primary purposes (the Local Activity Centre Zone).

The Local Activity Centre Zone is likely to comprise a variety of retail and commercial uses, and also includes the ability for the development of some residential land uses (where it does not undermine commercial land uses). Sonus were engaged to prepare an *Environmental Noise Investigation* to provide specialist advice in preparation of this Code Amendment, and is contained within **Attachment F**.

Sonus outlined that the nearest noise sensitive locations to the Affected Area comprised residential areas within the Hills Neighbourhood, Neighbourhood and Established Neighbourhood Zones.

Sonus reviewed the relevant provisions of the Planning and Design Code, specifically Performance Outcome 4.1 (PO4.1) of '*General Development Policies – Interface between Land Uses*'. PO 4.1 seeks to ensure that noise from development does not unreasonably impact on the amenity of sensitive receivers (or lawfully approved sensitive receivers).

The corresponding Deemed to Satisfy provision for PO 4.1 specifically references achieving the criteria of the *Environment Protection (Noise) Policy 2007* (the Policy), which provides objective criteria for the future noise sources at the site. The Policy is based on the World Health Organisation Guidelines for Community Noise (1999) (the WHO Guidelines) to prevent annoyance, sleep disturbance and unreasonable interference on the

amenity of an area and is therefore suitable for assessing the level of amenity for residents, as required under the Planning and Design Code.

For the purposes of the Sonus assessment, the potential uses outlined within the Deep End report provided a basis for noise level predictions from future development within the Affected Area.

Based on noise sources that may result in the Affected Area should the 'Local Activity Centre Zone' be implemented, and receivers being within the neighbourhood zones where the residences are located, the following goal noise levels would apply to any development within the Affected Area:

- an equivalent noise level (Leq) of 52 dB(A) during the day (7am to 10pm);
- an equivalent noise level (Leq) of 45 dB(A) at night (10pm to 7am); and,
- a maximum noise level (Lmax) of 60 dB(A) at night (10pm to 7am)

Based on the Sonus noise assessment and the types of anticipated types of noise related sources (such as vehicle and delivery movements, mechanical plant, use of forklifts etc), simple indicative treatments could be adopted to ensure future development will achieve the Planning and Design criteria. These include:

- *Construction of a boundary fence for the extent between the future residential sub division and any commercial activities. The fence should be no less than 2.1m tall, blocking line of sight between the car park and residences;*
- *Specific placement of restaurant outdoor dining areas and screening from residences using either the future restaurant building and/or the boundary fence noted above;*
- *Orientating buildings such that the major supermarket loading bays area away and/or shielded from the future residential subdivision;*
- *Specific placement and screening of mechanical plant for tenancies which are closest to noise sensitive receivers;*
- *Orientating any drive through such that the building shields nearby residences from idling vehicles and order units or where not possible constructing a barrier at the site boundary which blocks line of sight; and*
- *Rubbish collection being restricted to the least sensitive period of the day (consistent with the Part 6 Division 3 of the Policy).*

With the indicative acoustic treatments incorporated, noise levels from development within the Affected Area are predicted to achieve the Policy goal noise levels and therefore PO4.1 of the Planning and Design Code.

In their assessment of the proposed rezoning of the Affected Area to the 'Local Activity Centre Zone', Sonus provided the following conclusions:

- *Consideration is given to the existing provisions of the Code and the appropriate noise criteria are derived for any future noise generating development on the subject site. The criteria are determined in*

accordance with the Policy, which will ensure that suitable levels of residential amenity are achieved at existing residences and at the future residential subdivision land to the north;

- *Noise levels from indicative land uses for a Local Activity Centre Zone have been predicted and compared against the noise criteria. Indicative acoustic treatments have been provided to demonstrate that the criteria can be achieved, including fencing and barrier construction and suitable location and screening of mechanical plant;*
- *It is also noted that any future development on the site will be subject to detailed design and an environmental noise assessment at the planning stage to ensure that the noise criteria are achieved; and*
- *The assessment has therefore been based on the existing assessment pathways of the Planning and Design Code and demonstrates that with practical levels of acoustic treatment, any development as a result of the Code Amendment can achieve the provisions of the Code.*

Policy Response to Environmental Noise Investigations

Based on the findings of the Sonus investigation, it is anticipated that any future development of the Affected Area can be undertaken in a manner which would appropriately addresses environmental noise requirements of the Planning and Design Code, particularly the existing policy under ‘*General Development Policies – Interface between Land Uses*’.

5. References

Strategic Documents

- Alexandrina Council, 2020, *Alexandrina 2040* (comprising – ‘A2040 Narrative’, ‘A2040 Four Year Plan’ & ‘A2040 plan on a page’), published by the Alexandrina Council
- Alexandrina Council, 2014, *Alexandrina Community Strategic Plan 2014-23*, published by the Alexandrina Council
- Alexandrina Council, 2016, *Alexandrina Economic Development Strategy 2016-2022*, published by the Alexandrina Council
- Attorney General’s Department, 2017, *The 30-Year Plan For Greater Adelaide (2017 Update)*, website: <https://livingadelaide.sa.gov.au/>, published by the Government of South Australia, viewed 26 August 2022
- Southern and Hills Local Government Association, 2015, *Regional Public Health Plan for Southern & Hills LGA*, published by the Southern and Hills Local Government Association
- State Planning Commission, 23 May 2019, *State Planning Policies for South Australia*, website link: https://plan.sa.gov.au/resources/planning/state_planning_policies, Published by the Government of South Australia, viewed 26 August 2022

Technical Reports

- CIRQA, 12 October 2022, *Strathalbyn North Code Amendment, Adelaide Road Strathalbyn: Transport Investigations Report*, Published by: CIRQA, Adelaide, SA
- Deep End Services, 10 October 2022, *Lot 5 Hampden Way, Strathalbyn Code Amendment: Retail & economic investigations*, Published by: Deep End Services, Melbourne. VIC.
- EBS Ecology, 26 June 2022, Letter of Advice (Native Vegetation): *Lot 5 Hampden Way, Strathalbyn Code Amendment*, Published by: EBS Ecology, Adelaide, SA.
- Greenhill, 27 July 2022, *Lot 5 Hampden Way, Strathalbyn Code Amendment: Infrastructure Services Report*, Published by: Greenhill, Adelaide, SA.
- Sonus, July 2022, *Strathalbyn Code Amendment: Environmental Noise Assessment*, Published by: Sonus, Adelaide, SA.

Agency Responses

- Search results from the central archive of Aboriginal Affairs and Reconciliation (AAR) which includes the Register of Aboriginal Sites and Objects (the Register) for entries for Aboriginal sites within the Affected Area. (letter received from Aboriginal Affairs and Reconciliation, dated 27 May 2022)

Attachment A Map of Affected Area

Attachment B Current Code Policy

Attachment C Proposed Code Policy

Attachment D. Overlay Analysis

Attachment E. Strategic Planning Outcomes

Attachment F. Investigations

Attachment G. Certificates of Title