

25 August 2021



The Secretary  
State Commission Assessment Panel  
GPO Box 1815  
ADELAIDE SA 5001

Dear Commission

**SCAP REFERRAL – COUNCIL FURTHER COMMENTS – DA 21021500  
State Basketball Centre – 68 Goodwood Road (off Rose Terrace) Wayville**

Thank you for referral of the above-mentioned application. Council appreciates the opportunity to provide comment by 25 August 2021 to assist the planning assessment process by the State Commission Assessment Panel (SCPA).

The nature of development encompasses:

*Demolition of two (2) existing pavilions and construction of an indoor recreation facility (four (4) basketball courts) with associated office and café amenities, adjacent to and integrated with the existing basketball facilities (indoor recreation facility known as the Wayville Sports Centre) at the Adelaide Showground.*

Council seeks to provide comment on designated Council matters, and any observations on key local planning matters that require further analysis and assessment, to assist SCAP (State Commission Assessment Panel) appreciate the implications upon the orderly and proper planning of the area and the local public realm.

**Proposed Comments Summary**

New development is welcomed that leads to the sensitive growth, diversity and enlivening of the city, while maintaining the integrity and function of the area, local road network and the character and amenity of the city.

The **Recreation Zone** and more specifically the **Adelaide Showgrounds Sub-Zone** policy parameters were originally derived from well-established urban design principles, comprehensive local ('place') contextual analysis and subsequent extensive community engagement, and more recently broadly translated into the new Planning and Design Code policy.

Generally, the proposal reflects the broad intent of the zone and sub-zone but there are several noted implications warranting comment.

There may be limited variations; individually of minor, moderate or major significance; that need to be taken collectively and their compounding effect and overall level of variation from policy parameters given careful consideration.

The range of matters and comments raised in this response for further consideration by the SCAP as part of the assessment process, include:

- Indoor Recreation Facility development accords with land use intent;
- Building scale is large, but is within height and setback parameters, and in the context of the overall site a complementary element;
- Development integrated into the existing site behind the existing facility and maintains the Rose Terrace frontage, carparks and landscaping;
- The reduced parking rates promoted is not supported by evidence, whereby it is not possible to confirm if adequate rates have been provided for. Further, confirmation of arrangements how conflicting peak demands will be managed has not been provided. Given the acknowledged concerns with traffic, additional information is required in order to properly review potential impacts;
- Indicated traffic generation rates and distribution are not supported by clear evidence, or the survey's referenced, requiring additional information to confirm the assumed numbers and that the concerns noted are addressed;
- There is no apparent provision for on-site bicycle parking related to the development. This should be addressed, based upon the confirmed scale of development, and adequate provision, eg some 34 spaces, incorporated on-site;
- A comprehensive Waste Management Plan has not been provided that addresses the capacity, separated streams and vehicle servicing and access arrangements for anticipated waste generation;
- Stormwater Management is unclear and lacking information in respect to on-site detention and retention, including management of roof water, to limit discharge to suitable maximum rate, and what and how the permeable paving addresses site water volume and quality;

Council has delegated to the Chief Executive Officer or his nominee(s) the authority to negotiate appropriate outcomes regarding street trees, future public realm upgrades, in the event the application is approved.

### **Discussion**

The full assessment of the development is the role of the Planning & Land Use Services (PLUS) officers and the ultimate planning approval judgement the role of the State Commission Assessment Panel (SCAP).

It is appreciated Council's role is limited to comments on designated matters and observations in relation to planning assessment matters with implications from a local perspective that highlight key issues that require further analysis and assessment by PLUS officers and SCAP.

The nature of a large-scale indoor recreation facility development generally accords with the Recreation Zone and Adelaide Showgrounds Sub-zone intent. The facility suitably integrates with the existing site and presents as an appropriate quality building design and materials selection. The function of the facility with vehicle parking and traffic movement raise some questions and concerns.

## **Council Issues**

Council specific comment is provided in relation to matters where there are direct implications upon local public infrastructure as follows:

- Encroachments – footpath canopies
- Public realm and street trees
- Vehicle traffic, access, parking and waste servicing
- Stormwater management

### ***Encroachments***

#### **Footpath Canopies**

There are no encroachments of the public realm.

#### ***Public Realm and Street Trees***

There is no indicated change to the frontage of Rose Terrace, access points, footpaths or street trees.

Any damage, additional planting and reinstatement of footpaths etc will be managed and costs recovered via normal Council procedures from the owner/developer.

Onsite landscape treatment relies upon retention of existing trees in the carparks and adjacent to the western (railway) boundary.

### ***Vehicle traffic, access, parking and servicing***

#### **Traffic and Access**

The Performance Outcome regarding Traffic Impact seeks development that is integrated with the existing transport system and designed to minimise its potential impact on the functional performance of the transport system. In order to assess this, vehicle trip generation is calculated to quantify the increased traffic in the nearby road network.

The NSW Roads and Maritime Services 'Guide to Traffic Generating Developments', which is typically used for this type of assessment, does not identify a traffic generation rate relevant to 'indoor recreation facilities. Given this, Cirqa has reviewed previous traffic surveys undertaken at similar recreation facilities and estimated a peak hour traffic generation rate of 20-25 trips per court. Based on this rate, Cirqa has indicated an additional 80-100 peak hour trips generated by this site, with an additional 15 peak hour movements distributed to the nearby key intersections of Rose Tce/Goodwood Rd, Hamilton Blvd/Greenhill Rd and Cooke Tce Greenhill Rd.

Council is unable to confirm the proposed traffic generation rates as no evidence of the similar survey's referenced has been provided. Similar to traffic distribution, no evidence has been provided to confirm the level of traffic travelling to/from nearby key intersections, and their impact to those intersections.

Additional information needs to be provided to Council to confirm the proposed traffic generation rates and traffic distribution is adequate for the development (noting the concerns listed below).

Vehicle access to the site is from Rose Terrace, via an existing two-way crossover (approximately 6.5 metres wide). Rose Terrace is a two-way carriageway with on-street parking on both sides, which is in very high demand at most times and particularly during Showground events which are regular and frequent. Rose Terrace (section between Cooke Terrace to Hamilton Boulevard) currently carries approximately 1800 vehicles per day based on data collected in 2019. This data represents an average week day. Traffic volumes are much higher during events where motorists access the Showgrounds off-street car parks. Pick-up and drop-off also occurs on Rose Terrace during events.

Access and egress to this section of Rose Terrace can be via Goodwood Road (left turn in, right turn in outside of 3-7pm Monday to Friday, and left turn out), or via Hamilton Boulevard (left turn in and left turn out) or Cooke Terrace (left turn in only) from Greenhill Road. As such, a reasonable proportion of the 1800 vehicles per day are likely circulating to access on-street parking, or u-turning on-street to enable them to exit the area from Hamilton Boulevard or Goodwood Road. This suggests that in practice there are less vehicles using the street on an average weekday compared to a typical street carrying 1800 vehicles per day.

The desirable maximum volume of traffic on a local street per the Unley adopted road hierarchy is 1500 vehicles per day. The additional estimated traffic would result in a total traffic volume in the range of 1900-2000 vehicles per day. However, as discussed this is likely not a true reflection of the number of individual vehicles using the street. In addition to this, as egress from the area is only via left turns out on to Goodwood Road or Greenhill Road, it is unlikely that this increase in traffic volume would impact traffic queues at intersections (which are often the result of right turns out). Further it is acknowledged the nature and land use around Rose Terrace does not reflect a typical residential street and affords some greater capacity, albeit the Urban Corridor (Boulevard) Zone promotes mixed use residential apartments warranting recognition of a level of residential amenity.

As a location of high traffic and on-street parking demand it will be compounded by further development, but the width and nature of Rose Terrace maintains some capacity, providing future development incorporates proper distribution and consolidated access points and movements.

### Vehicle Parking

The Performance Outcome regarding vehicle parking seeks sufficient on-site vehicle parking and specifically marked accessible car parking places to be provided to meet the needs of the development, guided by appropriate standards. This can have regard to on-street parking provision and shared use of car parks, among other factors.

The Planning and Design Code - Transport, Access and Parking Table 1 - General Off-Street Car Parking Requirements seeks a rate of 4.5 spaces per 100m<sup>2</sup> of total

floor area for Indoor Recreation Facilities. The parking requirement would be calculated based on a total floor area of 5,227m<sup>2</sup>, which corresponds to a requirement of 235 spaces.

The Cirqa report has indicated that the Planning and Design Code overestimates typical design demands associated with such a facility. The report indicates that assessment should be based on a 'per court' basis, with parking rates of 20-30 spaces per court applied to multi-use courts. Based on these rates, the site is expected to generate an additional 80-120 parking spaces. No evidence has been provided to support the reduced parking rate, so Council is unable to confirm if adequate rates have been provided. In order to support a reduced parking generation rate, additional information is required from the applicant to ensure it is suitable for the development.

Cirqa indicates that evenings and weekends are typically when parking demands will be greatest (with all courts in use), and at these times parking demands within the Adelaide Showgrounds are typically very low, similar to on-street parking demands in the area. Based on the assessment Council is unable to confirm if there is adequate off-street parking in the area to cater for peak demand (noting the above concerns with the proposed reduced parking rate) as no parking survey data has been provided.

The Cirqa report has noted concerns when other events are held in the showgrounds or larger 1,600 occupancy events are held at the new stadium. The report states that this type of conflicting use would be rare, and demands can be adequately managed by the Showground management who have significant experience in the scheduling of multiple events and management of associated operational requirements. Council is unable to review how conflicting peak demands will be managed, as no information has been provided to support the proposed arrangement between parties. Given the acknowledged concerns within the traffic report, additional information is required by Council in order to review potential impacts to both parking and traffic during conflicting uses at the site.

There is regularly very high demand for on-street parking, mainly from adjacent business premises, residents and visitors, and during Showgrounds activities. On-street parking is generally time managed, 2 hours 9am to 5pm Monday to Friday with some limited unrestricted parking on south side. Unrestricted parking will be further reduced in the coming months with introduction of paid parking and additional time limit zones as part of a local area plan to better manage parking demand.

During many and major events at the Showgrounds, which are regular and frequent and particularly the annual show, special additional temporary controls and restrictions are applied across the area to ensure safe traffic movement. The level of on-site parking is therefore critical to not exacerbate the existing situation and to ensure a practical operation of the subject development.

#### Bicycle Parking

The Planning and Design Code - Transport, Access and Parking Table 3 - Off-Street Bicycle Parking Requirements for an Indoor Recreation Facility seeks 1

space per 4 employees plus 1 space per 200m<sup>2</sup> of gross leasable floor area for visitors.

Based upon the requirements, assuming 25 or so staff, 8 spaces would be required for employees, and a building area of 5,227m<sup>2</sup>, a further 26 visitor spaces would be required.

There is no apparent provision for on-site bicycle parking related to the development. This should be addressed based upon confirmation of the scale of development and adequate provision, eg some 34 spaces, incorporated on-site.

Further, the safety for cyclists traversing the vehicle driveways and carparking areas amongst moving vehicles requires consideration. Critically safety for riders and pedestrians should be addressed by clear signage, line-marking, lighting, escape routes.

### Waste Servicing

A 'Services Enclosure' is noted in the north east corner of the new building but it is unclear if this includes provision for waste storage.

Routine collection is anticipated, likely through accesses off Rose Terrace. It is unclear if this is a separate service for the Centre or will be incorporated with general Showgrounds servicing.

A comprehensive Waste Management Plan has not been provided that addresses the capacity, separated streams and vehicle servicing and access arrangements for anticipated waste generation.

### ***Stormwater Management***

The existing development has a high impervious area, but it is still appropriate maximum runoff flow rates should be managed.

On-site stormwater management is addressed through permeable paving (25m<sup>3</sup>) but it is unclear if this will provide storage and detention during a flood event. The onsite stormwater capture from the permeable paving should be maximised, noting the roof runoff is connected directly to Council stormwater network, and not detained. Provision should be made for adequate on-site storage for detention, retention and quality management to address on-site WSUD and address required maximum peak stormwater outflows.

In the Stormwater Management Report Appendix F (calculations) is missing and looks like a duplication of appendix E. Accordingly, the calculations for management of stormwater are not able to be reviewed.

The stormwater detention volume proposed appears acceptable, subject to approval condition to confirm the above requirements for water flow rate and quality.

Water quality issues also need to be addressed, with roof run-off direct to street, and therefore site area pollutants not able to be settled out through tanks and traps etc.

The building finished floor level relative to the circumstances is acceptable.

### ***Construction Management***

The construction of such a large development will be long and complex requiring careful consideration of staging and management of external impacts, notably traffic, parking, pedestrians and environmental emissions.

A Construction Management Plan, to address the expected implications of construction, eg vehicle/truck access, parking, loading, noise, hours etc, should be required as part of the approval and before proceeding with the development. Although some unrestricted on-street parking is available, this is often occupied very early in the day. Alternative parking options for tradespeople should be considered as part of the Construction Management Plan.

### **Conclusion**

Large development proposals are of great interest to Unley residents and businesses, particularly those near the site.

The Council is not the assessing authority, and only a referral agency able to make comments on direct impacts on local public infrastructure.

The nature of a large-scale indoor recreation facility development generally accords with the Recreation Zone and Adelaide Showgrounds Sub-zone intent. The facility suitably integrates with the existing site and presents as an appropriate quality building design and materials selection. The function of the facility with vehicle parking and traffic movement raise some questions and concerns.

The highlighted areas of missing, unclear information and potential concerns with traffic, parking, waste servicing, stormwater and construction should be addressed as part of the expected comprehensive assessment by SCAP.

### **Enquiries**

If there are any queries or need for further explanation or information please contact David Brown, Principal Policy Planner, [dbrown@unley.sa.gov.au](mailto:dbrown@unley.sa.gov.au) or 8372 5185.

Yours sincerely



**Peter Tsokas**  
Chief Executive Officer

