

4 April 2019

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

Attention: *Lauren Talbot* - Lauren.Talbot@sa.gov.au and scapadmin@sa.gov.au
Development Assessment, Planning and Development Directorate
Department of Planning, Transport and Infrastructure

Dear Sir/Madam

**SCAP REFERRAL – AMENDMENT – DA 090/E004/18
COUNCIL FURTHER COMMENTS
RETAIL DEVELOPMENT - 10 ANZAC HIGHWAY EVERARD PARK**

Thank you for referral of the amended application, received on the 14 March 2019 and further full information supplied on 19 March 2019, in relation to the above-mentioned application and response to issues raised by the State Commission Assessment Panel (SCPA) in its deferral in August 2018.

The invitation for further comment is appreciated. The 4 April 2019 (3 weeks) is a short turn-a-round but it is trusted the comments able to be provided will assist the improvement of the proposal and planning assessment process by SCAP.

These further comments supplement the original and post consultation revision comments and detailed submissions and focus on addressing the amended elements and highlighting the remaining areas of concern.

The applicant, and design team, are commended for being responsive with the amended proposal, which addresses many of the areas of concern previously raised. It is generally a beneficial refinement of the proposal and detailed design.

However, a number of areas of concern remain which require review by SCAP:

- Development solely comprises a large-scale retail use rather than an integrated primarily residential development with limited local commercial/retail uses in accord with the Urban Living Policy Area of the Urban Corridor Zone;
- Large-scale potential primarily residential development on the rear portion of the site (37%) is noted, and while not changing the contrary nature of the primary portion of the site (63%), it is recognised as a positive off-set in the

context of the overall Transit Living Policy Area desired character.

Further assurance is afforded through the applicant's agreement to a Land Management Agreement for the rear portion to be 'predominately' for residential purposes and 'ancillary' commercial or retail components. It is conceded this will help address the overall land use balance and the nature of the outcome for what is the largest and most prominent site in the remainder of the Policy Area;

- The series of speciality tenancies at ground level along the western (Anzac Highway) frontage and relocation of café and integrated playground and outdoor dining to the south west corner adjacent to Leader Street is positive. The separation from the main first floor level entry and escalators, at the eastern side of building, and separation of potential concentration of pedestrian activity may impact upon viability of small tenancies. It is trusted the nature of these tenancies and ability to create their own destination attraction will support their long-term success;
- A large scale simple low-rise 'warehouse' type building results in a sub-optimal building scale not capitalising on 6 storey zoning potential and an integrated mixed use and built form contrary to the Policy Area desired character. The forward re-positioning, increased side road setbacks, increased landscaping and more interesting elevations, eg Leader Street glazing and feature timber battens, are positive. It is noted there is a small increase in building height from 11.9 to 13.1 metres (14.6 in north west corner), but interestingly an indicated reduced extent of overshadowing rather than increase, not that there is an excess;
- In addition to traffic issues raised below, the existing and reinforced movement of pedestrians across Leader Street and particularly Anzac Highway from adjacent Ashford Hospital, to new major development, café and other tenancies, needs to be recognised and addressed. Pedestrian crossing with appropriate refuge in centre island, similar to others on Anzac Highway and Greenhill Road, convenient to the main entry point to the site and shops should be seriously encouraged to DPTI. Further, an identified and protected crossing point should be considered for Leader Street adjacent to the main supermarket entry;



- A comprehensive traffic and parking management assessment, in so far as supplied information allowed, has been undertaken and is attached.

Generally the design and arrangements are appropriate, albeit there are a range of remaining matters warranting attention:

- in-principle there is support for the modified signalised intersection of Anzac Highway and dual northern right turn lanes into Leader Street, acknowledging this is a balanced network solution to cater for increased traffic in but also out of the local area while maintaining flow on Anzac Highway;
- the development and associated infrastructure alterations are likely to pose notable traffic impacts on local road network. A review of traffic impacts will be undertaken 6 months following the commencement of operation of the main tenant of the site with a view towards assessing any necessary adjustments and improvements that should be made to the design and arrangements for traffic;
- turn movements at the southern access point on Leader Street currently meet the warrant for traffic signals.
Additionally, the removal of on-street car parking has not been quantified nor the undesirable potential impact upon recently installed infrastructure on the southern side of Leader Street from creating space for right turns. Maintenance of cycling path is positive.
A condition is requested that detailed design of the accessways to Leader Street, without impacting infrastructure on southern side and minimising on-street parking loss, be undertaken to the satisfaction of Council with a view for signals not to be required;
- a central raised island should be installed in the vehicle access point off Anzac Highway to ensure entry is facilitated and not compromised by exiting vehicles;
- based on expected future additional pedestrian demand generated by the proposal, pedestrian crossing infrastructure across Anzac Highway should be further seriously considered by the relevant authorities;
- public footpaths be reinstated and incorporated into public realm with a minimum width of 1.8-2.0 metres (minimum pinch points of 1.5);

Conditions

Following 6 months of operation of the subject development a Local Area Parking and Traffic Management review be supported to assess and implement any adjustments necessary to address identified traffic issues;

The detailed design of the accessways to Leader Street and provision for right turns in; while avoiding impacting infrastructure on the southern side, minimising on-street parking loss and maintaining designated bicycle path; be undertaken to the satisfaction of Council and with a view for signals not to be required;

A central raised island be installed in the vehicle access point off Anzac Highway to ensure entry is facilitated and not compromised by exiting vehicles;

Public footpaths be reinstated and incorporated into public realm with a minimum width of 1.8-2.0 metres (minimum pinch points of 1.5) and be resolved with, and approved by, the City of Unley at the expense of the applicant;

- The on-site vehicle parking layout is generally effective, efficient, appropriate for safe pedestrian movement and provision generous at over 8 spaces per 100m². Policy criteria for retail / mixed-use development in the Urban Corridor Zone is between 3 to 5 spaces per 100m².
A balance is necessary to provide enough but not too much to attract further vehicle movement.
A higher rate for such a stand-alone regional retail complex which is necessarily primarily a vehicle dependent destination is appreciated, including potential for accommodating future floor space expansion;
- Trading hours from 12:00am (midnight) to 9:00pm Monday to Friday, to 5:00pm Saturday and from 11:00 am to 5:00 pm Sunday have the potential to unreasonably impact overnight adjacent existing (Leader Street in particular) and potential (to east and Maple Ave) residential properties amenity and the broader neighbourhood. The scope of trading hours and/or the nature of operation at overnight hours should be mitigated to avoid undue loss of existing and desired residential use and amenity beyond and within the Policy area as a consequence of the development.
Standard limits encompass 7:00am to 9:00pm Monday to Saturday and 10:00am to 5:00pm Sunday by planning condition;

Condition

The commercial activities trading hours be limited to 7:00am to 9:00pm Monday to Saturday and 10:00am to 5:00pm Sunday;

- Servicing hours and potential greater noise disruptions, noting there is an undefined proposal for “night fill deliveries”, should be separately limited and noise controls and cancelling treatments incorporated to mitigate unreasonable impacts upon adjacent existing and particularly planned (to east and Maple Ave) residential properties amenity and the broader neighbourhood.
Standard limits encompass 7:00am to 7:00pm Monday to Saturday and 9:00 to 5:00pm Sunday by planning condition;

Condition

The delivery and servicing hours be limited to 7:00am to 7:00pm Monday to Saturday and 9:00 to 5:00pm Sunday, with all noise control measures and large service vehicle noise minimisation be incorporated to mitigate emissions and noise impacts beyond the site;

- The consolidated waste and delivery servicing area at the western end of Maple Avenue and limited access openings, movements, screening gates, fences and landscaping is positive.
The deletion and exclusion of heavy and emergency vehicle access to Leader Street is positive.
The tenancies waste management and delivery arrangements as part of vehicle entry off Anzac Highway, use of smaller trucks and loading in normal parking spaces area is effective;
- Main waste and delivery area on Maple Avenue have limited as far as possible the extent of crossovers relative to size of trucks and provided for extensive borders of screening landscaping and fences.
It is unclear if there are matching fence sliding gates to Maple Avenue to close-off and secure the area from visibility and access when area is not being

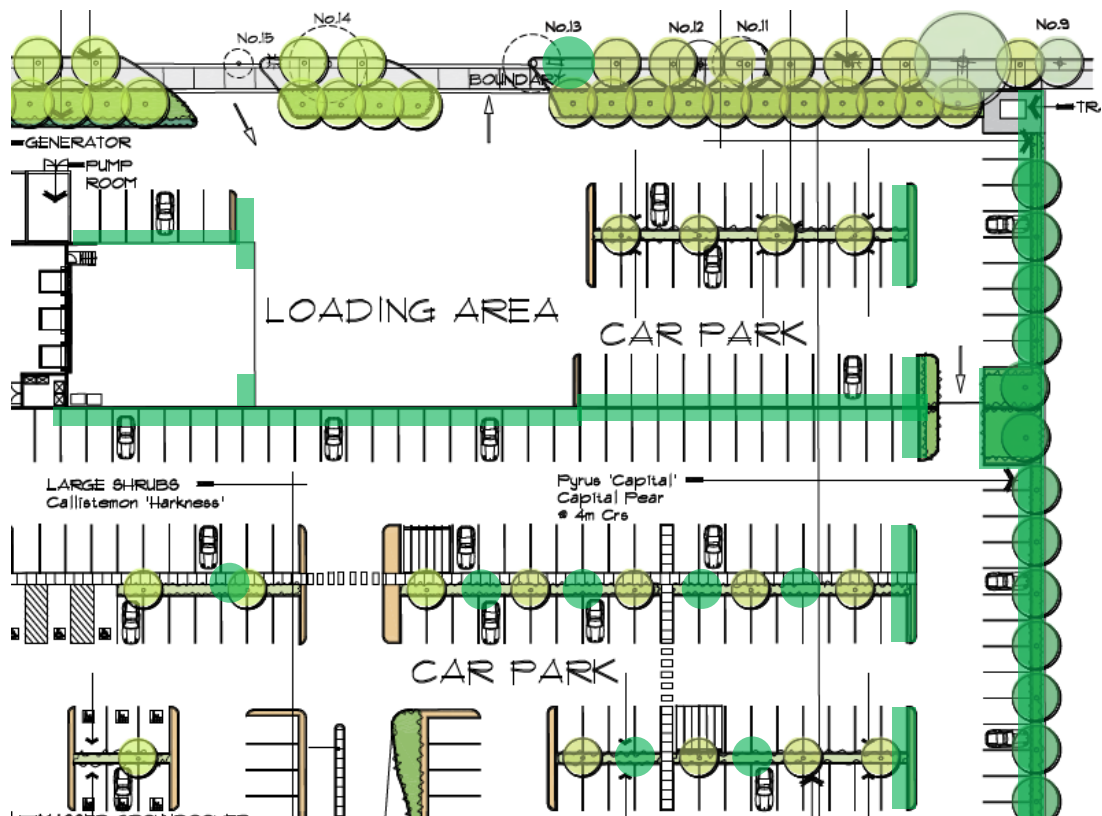
accessed and after hours.

Further, fence returns on loading dock area, increased landscaping could aid screening and containment of noise. See below;

Condition

The rear service and delivery area off Maple Avenue accommodate vehicles up to a maximum length of 16 metres and access openings be secured and closed-off from view by sliding gates (noiseless system) matching the boundary fencing adjacent to Maple Avenue;

- Appropriate building setbacks, particularly more generous to Maple Avenue, and quantity and quality increase and refinement of landscaping, including retention and supplementary street trees, more trees in and around carparks, perimeter areas, under building screening to car parking and use of locally successful species is all positive. The design, siting and landscaping generally enhances the quality of the overall development, future streetscapes and amenity for anticipated future adjacent mixed use and residential development in accord with the Desired Character of the Policy Area;
- However, further trees (at least 1 per 6 car spaces rather than 1 per 8 spaces), and additional landscaped areas and swale strips, should be included in front to Anzac Highway to enhance open exposed carpark area and in open rear carpark area car space end islands where possible and in particular north side of Loading Area internal screen fence, and adjacent to car spaces either side of screen fence between staff and public carparks an to replace street trees. See below;



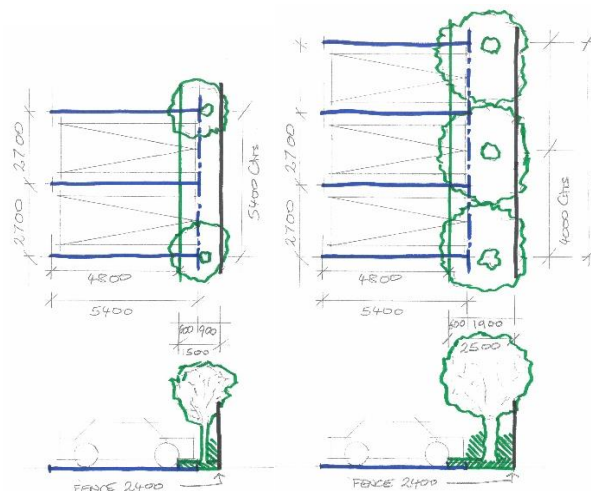
Condition

The landscaping to the rear portion of the site be improved by:

- removed street trees #13 be replaced with species consistent with those others proposed;
 - additional trees at ratio of 1 per 6 car spaces be provided in open carpark areas;
 - carpark row island ends be widened to accommodate further trees and landscaping;
 - landscaped areas, swales and trees be incorporated along northern edge of public carpark and southern edge of staff carpark;
 - landscaped areas and trees be incorporated along northern side of fence screen to loading area and to eastern side of loading area north and south wings to further enclose and screen area beyond space for 3 trucks access and parking needs;
- The rear eastern boundary landscaping annotation indicates trees (*Pyrus 'Capital' Pear*) at 4 metre centres but are shown at junction per 2 car spaces which would be 5.4 metres centres. Further, the width of the planting strip, including under car wheel stop area, is only 1.5 metres wide, and only 0.8 metres wide clear of nominal vehicle in parking position. This landscape strip should be increased in width to at least 2.5 metres (and 1.8 metres clear of vehicles) to afford space for trees at 4 metre centres and substantial under planting to create an attractive and effective continuous buffer and soft screen to the property to the east.

No indication is given on site/landscaping plans of fencing along the rear eastern boundary, but the Acoustic Report nominates a 2.4 metre high acoustic barrier.

These refinements should be reinforced by condition and refined detailing included on final plans.



Condition

The rear eastern boundary be fenced with a compatible appropriate quality finish continuous 2.4 metre high acoustic barrier, and the associated landscape strip be increased in length to the road boundaries (including past transformer

location) and in width to at least 2.5 metres (and minimum 1.8 metres clear of vehicles) to accommodate the proposed row of trees at 4 metre centres and appropriate substantial under planting to form an attractive and effective acoustic and continuous landscape buffer and soft screen to the property to the east;

- Retention of key street trees on Anzac Highway and Leader Street, and supplementary planting, is positive.
Generally, the approach to street trees is reasonable in the context of the overall scope of street trees and supplementary planting. See above.
The removal of the mature tree (#32) to Leader Street to accommodate the apparent main pedestrian access point is queried. The access point could potentially be moved and/or split to include the western side of column support and the mature tree retained.
The removed Maple Avenue street tree #13 should be replaced;

Conditions

The mature tree (#32) to Leader Street be retained and pedestrian access point moved and/or split to the western side of column support to assist with this;

The removed Maple Avenue street tree (#13) be replaced;

Public realm configuration, damage, alterations and improvements in relation to water-tables, footpaths, verges and street trees (removals and replacements) be resolved with, and approved by, the City of Unley at the expense of the applicant;

- On-going maintenance will be critical to maintain screening and should be reinforced by suitable planning condition to enforce suitable species, design detail, implementation and ongoing maintenance, for endorsement by SCAP and City of Unley before Development Approval and commencement;

Condition

Full landscaping details and species, including additional trees at 1 per 6 vehicle spaces in open carparks and along loading and staff area screen fencing, be incorporated prior to occupation.

Ongoing maintenance of all landscaping be undertaken to ensure all plants remain in sound and thriving condition, and be promptly replaced if and when die;

- Outdoor advertising signs number and area, while relative to context of building scale, exceeds normal policy and in particular the sensitivity to adjacent residential properties in Leader Street and general nature of the Transit Living Policy Area Desired Character.
Building elevation signs number, location and size could be reduced, and in particular internally illuminated signs.
The pylon sign adjacent to Leader Street entry should be reduced to a maximum of 6.0 metres high in accord with normal policy.
Replacement of main pylon sign (double sided to triple sided 6x6 metres panels albeit matching existing height at 20.6 metres) and relocation within the front western carpark closer to Anzac Highway is excessive. As a new and relocated sign its scale and height should be reduced to relate to the scale of building, the nature of the area and desired character of the Policy Area;

Condition

Outdoor advertising signs be reduced in number and scale, including internally illuminated signs on building elevations, the pylon adjacent to Leader Street vehicle entry to 6.0 metres high and the pylon sign in the front carpark adjacent to Anzac Highway from 20.6 to 12-15 metres in height and total area to better relate to the building scale and Transit Living Policy Area Desired Character;

- Flood and stormwater management details as submitted are noted and generally acceptable. Final details be addressed by condition and confirmed prior to Development Approval.

The undercover carpark surface should be carefully graded (as part of site works and drainage plans) to ensure that any surface water can flow away; All stormwater connections from site to Council's drainage infrastructure in the road reserve should be Reinforced Concrete Pipe (PVC connections not acceptable) into Council's stormwater drainage network;

Condition

The final floor, site and grading (for appropriate water flow) levels and appropriate stormwater management (final specifications and maintenance regimes of on-site detention depressions (carparks) and tanks, retention tanks, water reuse, bio-retention/swales and limitation of discharge outflow (to be below equivalent of 80% site impervious area) and use of only Reinforced Concrete Pipe to Council's stormwater infrastructure be confirmed and endorsed before final Development Approval is granted;

- A comprehensive Construction Management Plan is required prior to Development Approval and commencement of works on-site to avoid undue external impacts during construction;

Condition:

Construction Management Plan be developed and agreed with the City of Unley and SCPA prior to Development Approval being issued to mitigate undue impacts upon the locality; and include:

- *Staging to contain activity to the site;*
- *Traffic requirements including construction access/egress and heavy vehicle routes;*
- *Tradesperson vehicle parking;*
- *Work in the public realm;*
- *Hoardings;*
- *Operating hours, noise, dust and emissions control.*

Conclusion

The development proposal is of great interest to Unley residents, particularly those in close proximity to the site.

The Council is not the assessing authority, and only a referral agency able to make comments. It is therefore appropriate that Council concentrate on the specific

areas of direct control while raising its concerns regarding the most significant divergences from the planning policy parameters.

It is trusted this information, and prior comprehensive analysis, will be duly considered by the Planning Assessment Officers, Department of Planning Transport and Infrastructure, and the State Commission Assessment Panel in their deliberations.

ENQUIRIES

If there are any queries or need for further explanation or information please contact David Brown, Principal Planner.

Yours sincerely



Peter Tsokas
CHIEF EXECUTIVE OFFICER