

19 June 2018

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

Attention: Karl Woehle

Planning Officer - CBD & Inner Metro Team
Strategic Development Assessment
Planning and Development
Department of Planning, Transport and Infrastructure

Dear Commission

**INFORMAL REFERRAL COMMENTS – DA 090/M005/18
248-252 UNLEY ROAD UNLEY**

Thank you for the informal referral received on the 8 May 2018 of the above-mentioned application lodged with the State Commission Assessment Panel, and invitation for comment within 6 weeks (19 June 2018) to assist the assessment process.

The nature of development encompasses:

Demolition of existing building structures, removal of two significant and one regulated tree. Construct six, two storey residential dwellings and a seven storey mixed use building containing five commercial tenancies, residential apartments, landscaping, ancillary car parking and associated building work.

Council seeks to provide comment on designated Council matters, and observations on key local planning matters, that require further analysis and assessment by SCAP (State Commission Assessment Panel) in accord with the Heads of Agreement with the State Government in relation to such applications.

Proposed Comments Summary

Generally, the proposal is a positive and quality design for Unley Road and the site context. However, there are concerns with the degree of variation from some key planning policy parameters, various details and local parking, road and infrastructure impacts of the proposed redevelopment in its current form.

The Urban Corridor Zone (and High Street Policy Area) derive from application of well-established urban design principles, comprehensive local ('place') contextual analysis and subsequent extensive community engagement in arriving at the resultant agreed planning policy and fundamental design parameters in the Development Plan. Therefore, there is a good appreciation and an expectation that the planning policy should command corresponding respect as a well-reasoned and accepted desired character outcome for the corridor, precinct and places. A proposal and assessment judgement should illustrate due regard for the policy and provide clear justification for any limited variation that may be warranted relative to the specific local circumstances and achieving a better design/place outcome (for all).

Overall, the proposal is well considered and a refined design but there are a number of variations from fundamental policy parameters. Some are limited variations, individually of moderate significance, but some are substantial variations. Further, taken collectively there is a compounding effect, and consequently this leads to the judgement there is a serious variation from applicable Development Plan policy parameters.

The range of matters raised in this report require further consideration by the SCAP as part of the assessment process, including:

- Building over-height - 7 storey versus 5 storey (extra 5.8 metres and 31%)
- Inadequate on-site visitor parking provision (shortfall 8 spaces) and allocation of basement parking for commercial tenants;
- Opey Avenue traffic and on-street parking management;
- Overlooking minimisation;
- Significant and Regulated Trees loss;
- Appropriate trading/operating hours;
- Podium façade detailing and arrangement of footpath canopies;
- Building setbacks to Opey Avenue for additional landscaping;
- Extent and location of trees and landscaping, including internal driveway, western zone boundary setback, correct location details and species selection;
- Unley Road and Opey Avenue public realm implications including provision of street trees replacement and footpath and verge treatment;
- Waste and service vehicle limitations and management;
- Appropriate Stormwater Management
- Planning Consent conditions.

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, canopy encroachments and outdoor dining arrangements, in the event the application is approved.

Background

The Urban Corridor Zone – High Street (Unley Road) Policy Area, for mixed-use development up to five (5) storeys (18.5 metres), was introduced into the Development Plan on the 31 October 2013.

Concurrently, the Minister for Planning amended Schedule 10 of the Development Regulations to make the State Commission Assessment Panel (SCAP) the relevant authority for development of five (5) storeys or more in the Urban Corridor Zone.

No formal referral to Council is required. A Memorandum of Agreement (MoA) with the Department of Planning Transport and Infrastructure (DPTI) provides for informal referral to Council seeking comments on limited specific matters.

Through the informal MoA arrangements, Council officers can have a limited opportunity to provide input via the DPTI confidential Pre-Lodgement Panel deliberations and Design Review by the Government Architect. This is a voluntary process. It is noted, the applicant has declined to participate on this occasion.

Discussion

The full assessment of the development is the role of the Department of Planning Transport and Infrastructure (DPTI) 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 matters within its direct control but observations are provided in relation to planning assessment matters from a local perspective to highlight key issues that may require further analysis / assessment by DPTI officers and SCAP.

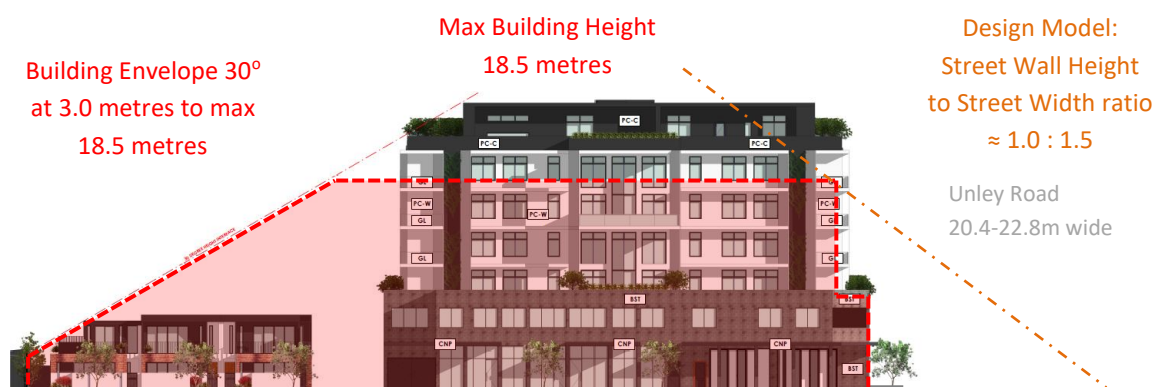
Proposed Development

In brief, the proposed development encompasses the following key features and planning concerns:

- Site comprising part of overall land holdings with frontage to Unley Road of 39.5 metres and depth of 73.6 metres and 71.5 metres (frontage to Opey Avenue) and an area of approximately 2,850m²;

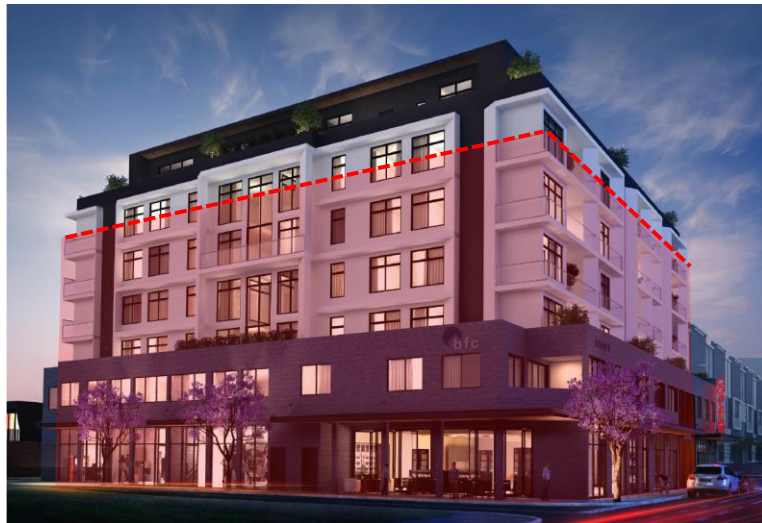


- Development comprises a 7-storey mixed use tower on the east major portion of the site (including basement and ground level parking, ground and 2nd floor commercial tenancies and on 2nd to 7th floor 63 apartments) and to the rear west portion of the site 6 x 2-storey townhouses off Opey Avenue. In addition to good extent of commercial space and active ground level frontages, a residential net density of 161 dwellings per hectare is well above desired minimum of 60 d/Ha;
- The proposal emulates the recent approved 7-storey (26.9 metres) development at 244-246 Unley Road to the north. Both these proposals reflect the previous whole block approved development in 2015, but with less total mass, smaller corner towers and more articulated design;
- Ground floor to comprise of 5 tenancies (possibly more if internally divided), and part of first floor 3 tenancies adjacent to Opey Avenue, for a range of potential café / shop / office / commercial uses of a nominated 803.5m² and an additional flexible coffee bar area in lobby of some 37m² equating to a total of 830m² net lettable area. Car parking calculations are based on gross leasable floor area which is estimated to be around 895m²;
- Second to seventh levels above to comprise 63 apartments, including 12 x studio, 3 x 1 bedroom, 25 x 2 bedrooms and 23 x 3 bedrooms;
- 6 x 2-storey 3 bedroom townhouses (3 fronting Opey Avenue and 3 to north west corner), each with double garages, are located to the rear/west portion of the site with access and service from the main driveway off Opey Avenue;
- Height to seven (7) storeys (24.3 metres excluding roof services) versus policy of five (5) storeys (18.5 metres). Represents a significant variation over the total desired height by 5.8 metres and 131%. Apparent street wall height, to visible balcony not including top recessed level, is 21.5 metres or 116%, still a notable variation. Removal of a lower level or two would be more compatible and warranted, with recessed form at 6 storey (21.3 metres and 115% and street wall 18.3 metres and 99%) or 5 storey (18.1 metres and 98%);



Limited rear built form and mass is positive and that the whole built form and extra tower height is contained within the fundamental zone boundary transition interface building envelope;

- Above the 2 storey podium façade, to Unley Road, upper levels are setback 2.4 metres (versus required 3 metres) with balconies largely recessed, small intrusions, but a notable setback relief is provided;
- Above the 2 storey podium façade, to Opey Avenue, upper levels are setback 3.05 metres, with limited intrusion by a balcony and minor building elevation features;
- The Street Wall height to Unley Road and Opey Avenue (desired 18.5 metres) is limited to around 21.5 metres with the top 7th storey (24.3 metres) recessed from the edge to reduce dominance in perspective. It will still be apparent and dominate from adjacent outlooks, and well beyond desired scale and bulk;



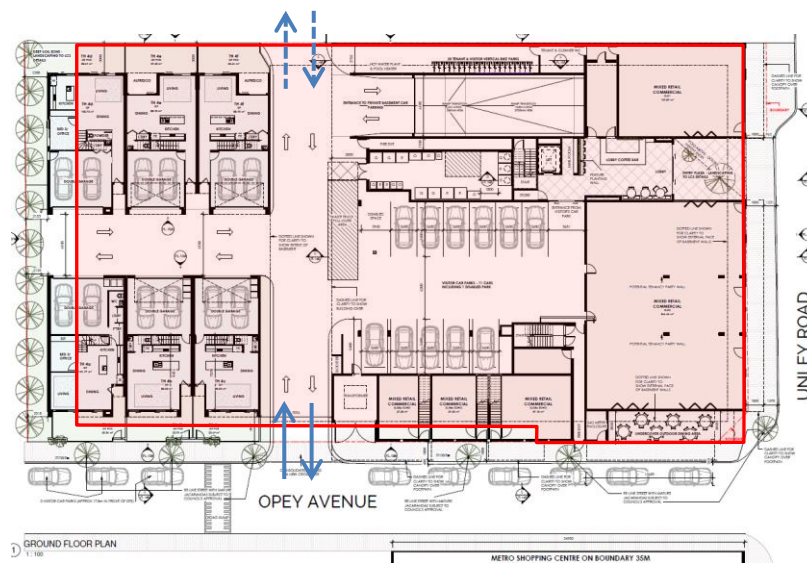
- A positive design response to the local context is evident. The building emphasises a modern base podium façade (random bluestone tiled cladding), glazed shop fronts, above canopy fenestration and canopies sections over street frontages. Upper residential levels recessed from podium with mixture of mainly white concrete, and charcoal concrete feature elements, large openings and balcony/canopy features to articulate its overall mass.

Appreciate treatment is contemporary and simple but more articulation, colour and detailing could be provided to the podium parapet facade with fenestration relief to its flat profile, projecting column and/or pediment features and emphasised deeper cantilever canopies to better complement the desired and existing intimate and textured streetscape pattern;

- At the ground level 0.0 metre road and side boundary setbacks are acceptable, and up to 3.0 metre setbacks can be provided for outdoor dining, eg Opey Avenue adjacent to Unley Road.

Along the secondary street frontage of Opey Avenue a 2.0 metre setback from 20.0 metres from the Unley Road alignment should be provided, whereas the 0.0 metres setback extends for some 36 metres. A setback would further soften the Opey Avenue built form and allow for additional landscaping to this part of the streetscape.

- The townhouses provide a positive setback and landscaping relief to this western portion of the total street frontage. While the western zone boundary rear setback should be 5.0 metres, the townhouse scale and form emulates a more typical scenario. A reduced setback is reasonable while an appropriate separation and soft green screen is provided;



- One two-way accessway (tenant/resident and visitors) is provided to Opey Avenue. This consolidates and replaces two current accesses on Opey Avenue and one on Unley Road. This is positive and could realise an extra on-street car space on each frontage. Refer to Council section on broader on-street parking implications.
- It is indicated the accessway through the site will line-up and afford movement through the adjoining site to the north, and vice-a-versa, to improve on-site movements. This is very beneficial but should be reinforced in the development by conditions ensuring accord with approved designs and preferably a reciprocal Encumbrance or Land Management Agreement;

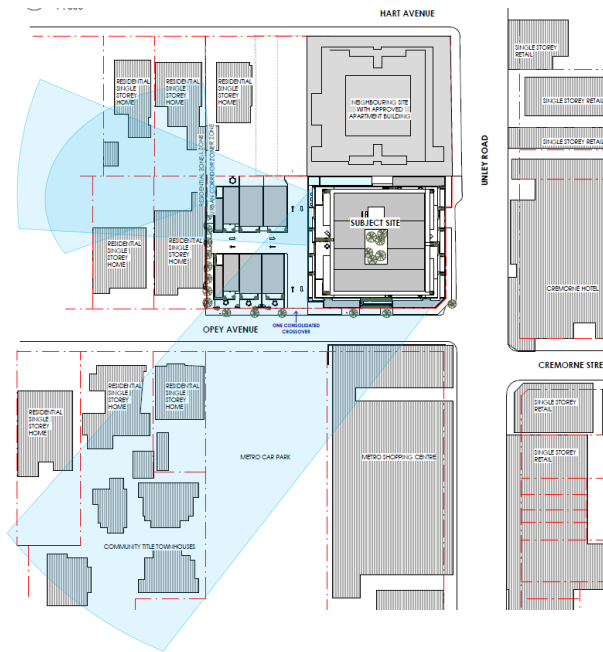
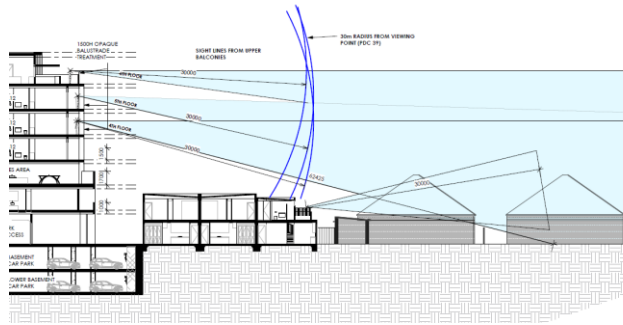
- Required configuration for Opey Avenue that can appropriately accommodate increased traffic movements and frequency of large waste vehicles leads to a need for loss of current on-street parking on one side of the street adjacent to the site. This makes level of on-site parking more critical;
- Internal carparking is provided at ground level (11 spaces) and in two lower internal basement levels (90 spaces – 23 double stacked).
For 101 spaces 4 disabled disable spaces should be provided – 1 is in visitor area at ground level and while not indicated there are sufficient spaces in basement with extra width that could be so designated. Design and dimensions should be in accordance with Australian Standards.
Provision for resident parking is generally appropriate and in accord with requirements - 59 spaces for 63 apartments.
The provision for visitor parking, however, is insufficient.
With mixed-use the 11 spaces can reasonably be shared between commercial (primarily day-time) and residential (primarily night-time).
The 69 dwellings require 17.25 spaces (6.25 short).
The commercial space requires 26.5 spaces. Based on 4 of the studio/1 bedroom dwellings not needing parking spaces there are 8 spaces available for commercial tenants, making a total of 19 spaces (7.5 short).
Accordingly, there is a shortfall of 8 spaces on-site within the ground level residential visitor/ tenant car park area.
The ground level visitor parking provision needs to be increased, and/or the commercial floor space and number of dwellings reduced commensurately.
The parking standards are already favourable and premised on a mixed-use activity and an availability of on-street parking in the area. While on-street parking adjacent to the site may be improved by 2 or 3 through accesssway consolidation, the on-site shortage is compounded by the need to remove all on-street parking on one side of Opey Avenue to accommodate expected vehicles and movements;
- Bicycle parking is provided for 20 public visitors in dedicated room at ground level, 67 racks for employees / occupants with carparks in basements plus room in each apartment's storage area. This exceeds total policy requirements;
- The apartments are provided with good areas for storage within the basements. The townhouses lack necessary and adequate storage (in addition to bin and vehicle areas). Garages have insufficient internal dimensions - double garages min 5.8 x 6.0 metres – some appear as low as 5.5 wide and/or 5.5 deep. This could readily lead to garages becoming used for storage and/or unsuitable for parking and consequently compounding on-street parking demands;
- Removal of significant, regulated and large mature non-regulated trees is an unfortunate loss of mature trees and green canopy.
The trees form notable landmarks in the streetscape. While it is appreciated the desired nature of intensive development should not be unduly impeded, and the proposed public realm upgrade is appreciated, it is unfortunate some mature planting could not be incorporated into the development. Contribution will need to be made into Council's Urban Trees Fund to compensate for their loss;
- Proposed site landscaping is generally positive but limited to selected areas and of varied scale around rear townhouse area.

While 216m² (7.6%) deep soil is nominated as available, some is paved and much is not planted to canopy trees as required. The actual canopy cover requires closer examination.

More trees should be located along the rear western boundary for softening and screening (stagger pedestrian path and relocate bin storage area to create greater spaces along the boundary for trees at key front, middle and rear open areas) and within courtyards to north and south to enhance canopy cover, microclimate and amenity;

- Driveway off Opey Avenue needs widening from minimum 6.0 metres (minimum from kerb edge to hard wall face) and whole access/service area afforded more softening by further planting and/or vertical trellis to walls along the side of northern townhouse group and all western ground levels/walls of front tower mixed use building;
- Larger common and balcony areas small tree and shrub planting is positive to help soften and shade external building elements. The apartments enjoy an internal courtyard with planter boxes and trailing vines;
- Plant species needs review to avoid fruit and deciduous leaves drop plus suitability for circumstance, eg glory vine on upper walls impractical being deciduous, not self-climbing/attaching and requiring mechanical fixing as grows up the very high walls) and evidence of how all are to sustained (individual planter boxes and vines etc) in the long-term;
- Unreasonable open overlooking of adjacent residential private areas, to the west and also obliquely to northwest and southwest, from rear and sides needs to be better addressed, ie by alternative orientation of outlooks, focus on long views, recessed viewing points, over reliance on variable effect vines, higher / wider / angled screening (eg obscure glass) to balconies and windows;
- There is little detailed information of overlooking mitigation and screens. There are some notes about 1.5 metres sills/screens but this is inadequate and below standard of 1.7 metres, unless viewing position physically fixed well back from screen to achieve same effect on downward angle.

The general *Residential Development* policy regarding a 30 metre separation does not address consideration of the general policy in *Design and Appearance, Interface Between Land Uses, Medium and High Rise Development (3 or More Storeys)* and *Urban Corridor Zone* policy where additional general policy indicates “...*minimise direct overlooking of the habitable rooms and private open spaces of dwellings...*” “*Development adjacent to a Residential Zone should be designed to minimise overlooking and overshadowing of adjacent dwellings and private open space...*” “*Balconies ... should ... allow views ... while providing for ... visual privacy of nearby living spaces and private outdoor areas...*” “*...Overlooking ... impacts will be moderated through good design and mitigation techniques ...*” “*... Impacts on adjoining zones will be minimised through appropriate ... design and location of on-site activities/windows/balconies ...*”



- Overshadowing is limited given the built form is contained within the building transition envelope (ie 30° @ 3.0 metres agl). Morning shadow at the worst case winter solstice will be clear of adjoining residential properties from before 10:00am;
- Waste management arrangements (a central separate streams service) from the rear of the main building is appropriate. The three townhouses fronting onto Opey Avenue are able to be serviced by Council’s normal on-street service. Waste vehicle servicing is to occur from the rear of the main building and off Opey Avenue. It will involve large vehicles stopping in the street and reversing into accessway to service on-site bin storage area to enable exiting in a forward direction. This is not ideal, and securing indicated potential arrangement to link with site to north, and for both, to facilitate drive-through capability and vehicle entry and exit in a forward direction. Operational management condition to limit service times should help reduce potential conflict;
- On-site stormwater management is not nominated, other than it will address policy requirements to provide for lower out flow than existing. Provisions will need to be subject to a condition requiring adequate detention, retention and quality management to address on-site WSUD and required peak stormwater outflows (less than pre-existing or equivalent 80% impervious, whichever is the

lesser) in accord with City Of Unley *Development And Stormwater Management Design Guide*;

- Energy efficiency includes provision for passive design, natural light and cross-ventilation. Solar collection panels are not currently included but good solar access is available for future fitting on the roof-top. General landscaping, courtyard/balcony planting and green walls is positive.
- Construction Management Plan to avoid undue external impact – past experience has demonstrated the critical importance of an effective Construction Management Plan in assisting to mitigate undue impacts, including vehicle movements, worker parking, operating hours, noise etc. The location of this site on a major arterial road means containing the impacts of the construction to the development site is even more critical.

Overall, the proposal has a number of variations from fundamental policy parameters. Some are limited variations, individually of moderate significance, but together and the key elements are considerable variations. The proposal is a new application to be determined on its own merit, not on any previous precedence, and the integrity of the policy, resolved after comprehensive community debate, should be better observed.

Council Issues

Council is able to provide specific comment 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

Desirable 1.8 metre wide (up to within 0.6 metres of kerb) separated sections of cantilever canopies are proposed over shop front openings along Unley Road and Opey Avenue. Selected breaks and open sections allow for existing infrastructure and street tree planting.

The proposed outdoor dining on the south east corner, on Opey Avenue adjacent to Unley Road, is entirely contained to the site.

The encroachments over the public realm are lightweight and non-integral to the main building which enables them to be addressed by Council's standard policy licensing requirements.

Public Realm / Street Trees

There are only two small street trees (a *smooth-barked apple* and a *narrow leaf ash*) on the northern side of Opey Avenue. They may be in fair condition but are not noteworthy, of poor form, damaged and intruding into the vegetation clearance zone.

Their suggested removal and replacement is unfortunate. A comprehensive public realm, materials and street tree plan, including multiple Jacaranda's, to suit street frontage configuration, consolidated accessway, footpath building canopies and Council specifications is positive. The public realm and street tree detail will need to be negotiated.

At this stage no discussion has occurred on Council requirements and additional opportunities to collaborate and mutually contribute to a public realm upgrade.

Additional landscaping on the site will be provided adjacent to the rear boundary, around townhouses and upon the upper development and balconies.

Construction will impact upon the area and footpaths surrounding the site. Alternative arrangements will need to be made during construction.

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

Vehicle traffic, access and parking

Traffic and Access

One two-way accessway (tenant/resident and visitors) is provided to Opey Avenue. This consolidates and replaces two current accesses on Opey Avenue and one on Unley Road.

The two-way access is indicated to be 6.1 metres (inclusive of 0.3 metre clearances, including to a hard wall edge) which is minimal and likely to lead to drivers not hugging their sides and therefore blocking opposite movement and interrupting on-street movement. The driveway should be made wider to facilitate easier and safer movement.

Opey Avenue is currently a narrow street and the safe vehicle movement pathways, including for larger waste and service vehicles (max 8.8 metres long) based on more favourable right turn in from Unley Road rather than tighter left turns. Right turns may be complicated by future tram arrangements which may further compound design tolerances in Opey Avenue.

It is indicated the accessway through the site will line-up and could afford movement through the adjoining site to the north, and vice-a-versa, to improve vehicle movements. This is very beneficial. It should be reinforced in the development by conditions ensuring accord with approved designs and preferably a reciprocal Encumbrance or Land Management Agreement.

Traffic generation modelling for peak periods indicates the proposed commercial and mainly residential combination will increase daily traffic along Opey Avenue and the surrounding local road network. However, it will be to a limited degree relative to current extensive largely commercial development and primarily focussed towards Unley Road. The traffic at Opey Avenue/Unley Road intersection should perform satisfactorily. Overall a traffic increase will be noticeable but it is envisaged to have a minor impact on traffic performance and efficiency.

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 the reasonable satisfaction of Council, should be required as part of the approval and before proceeding with the development.

Parking

Based on provisions for higher density and mixed-use development in the Urban Corridor Zone in the Unley (City) Development Plan (Table Un/5 for residential and Un/5A for commercial) provide for the required car parking as follows:

Land Use	Scale	Rate	Required	Provided
Shop/Office/Consult	850m ²	Min 3 / 100m ² gla	25.5	
Outdoor Dine	35m ²	Min 3 / 100m ² gla	1.05	
Visitor – ground level				11*
Tenant - basement				8+
Total			26.55*	19
Apartments				
Studio	12	0.75	9	
1 bed or < 75m²	3	0.75	2.25	
2 bed or > 75m²	25	1.25	31.25	
3 bed or > 150m²	23	1.75	40.25	
Individual access	63			59+
Tandem spaces	23			23
Total			82.75	82
Visitor	63	0.25	15.75*	11*
Townhouses		Table Un/5		
3 bed or > 150m²	6	1.75	10.5	12
Visitor	6	0.25	1.5*	0*
Total Visitor	69	0.25	17.25*	11*

+ Of the 63 dwellings the equivalent of 4 studio/1 bedroom may be provided with no car space leaving 8 of the total of 67 individually accessible spaces for commercial tenants

* Resident visitor and commercial public parking may be shared given complementary peaks

gla “**gross leasable area** means **total floor area** of a building excluding public or common tenancy areas such as malls, verandahs or public toilets”

“**total floor area** with respect to a building or other roofed area means the sum of the superficies of horizontal sections thereof made at the level of each floor, inclusive of all roofed areas and of the external walls and of such portions of any party walls as belong to the building”

The provision for tenant and resident parking is generally appropriate and in accord with requirements.

One disable space is provided at ground level but based on 1 space per 25 spaces there should be a total of 4, ie a further 3 within residents area. While not indicated there appears sufficient extra width with some of the basement spaces that could be made suitable.

Car park designation and allocation should be reviewed.

There is inadequate provision for visitor parking. With mixed-use the visitor spaces can reasonably be shared between commercial (primarily day-time) and residential (primarily night-time). The 70 dwellings require 17.5 spaces and is therefore 6.5 short. The commercial space requires 26.5 spaces. Based on 4 of the studio/1 bedroom dwellings not needing parking spaces makes 8 spaces available for commercial tenants. This potentially increases provision to a total of 19 spaces which is therefore 7.5 short. Accordingly, there is a shortage on 6.5 to 7.5 visitor spaces on-site.

The parking standards are already substantially discounted for mixed-use and availability of on-street parking in the area. Expectations for additional discounting based on the reasons already accounted for are unwarranted.

On-street parking adjacent to the site may be improved by 2 or 3 through accesssway consolidation, the on-site shortage is compounded by the need to remove all on-street parking on one side of Opey Avenue to accommodate expected vehicles and movements. There is currently significant on-street parking occurring in this location, mainly from adjacent business premises and staff, and the banning will lead to their relocation. A subsequent comprehensive traffic and parking study will be required to address the appropriate configuration and management within Opey Avenue. The level of on-site parking is therefore critical.

Based on provisions for higher density and mixed-use development in the Urban Corridor Zone in the Unley (City) Development Plan (Table Un/6) provide for the required bicycle parking as follows:

Land Use	Scale	Rate	Required	Provided
Shop/Office/Consult	895m ²			
Employee (basement)		1/150m ²	9	8 ⁺
Visitor (ground level)		2 + 1/500m ²	4	20*
Residential	70			
Resident		1 / 2 dwellings	31.5	59 ⁺
Visitor		1 / 6 dwellings	10.5	20*
Total			55	87
Employee / Resident			40.5	67
Visitor			14.5	20

Bicycle parking is provided for 20 public visitors in dedicated room at ground level, 67 racks for employees / occupants with carpark in basements plus room in each apartment's storage area. This exceeds policy requirements.

Waste Servicing

A comprehensive Waste Management Plan addresses the adequate capacity, separated streams and on-site servicing for waste generation.

The townhouses directly fronting onto Opey Avenue can access the standard Council residential waste services.

The remaining Commercial and residential requirements will be met by an on-site management and collection system.

Routine collection is anticipated to occur 9 times per week. Some particular commercial tenants may require additional specific pick-ups and hard waste will occur several times per month on a needs basis.

It has been nominate collections be between 10:00 am to 4:00pm to minimise impacts to residents and peak traffic. While favourable, avoiding Sunday servicing would be positive.

Waste vehicle servicing will occur from Opey Avenue, with the vehicle entering and exiting in a forward direction. Manoeuvring would happen on-site. While not guaranteed, if an agreement with the property to the north is attained trucks can drive through the sites from Hart to Opey Avenue, which would be favourable for both.

Stormwater Management

The existing development has a very high impervious area whilst the proposed development is probably similar.

The maximum runoff flow rate for commercial development is less than pre-existing and desirably the equivalent of 80% impervious (20% pervious) which ever is the lesser.

The outflow to Unley Road and Opey Avenue to address 1:10 year ARI events should be kept below 4 to 5 l/s. These should be distributed equi-distant, and as generously separated as possible, along both the Unley Road and Opey Avenue street frontages. The closest stormwater main is across Unley Road making a direct connection impractical.

Water quality issues are limited. Stormwater is mostly roof run-off, with gross pollutants able to be settled out through the tanks. The driveway and paved surfaces could lead to more pollutants but these are to be treated via grated sump traps.

Planning Consent Conditions

In the event approval is contemplated there are various issues that have been identified where planning conditions are warranted, as follows:

- The accessway through the site, affording movement through the adjoining site to the north, and vice-a-versa, to improve vehicle movements, should be reinforced by a reciprocal Encumbrance or Land Management Agreement to ensure ongoing provision, and appropriate and shared maintenance arrangements;
- Townhouses be provided with adequate storage space (eg >8m³), in addition to waste bin storage areas and vehicle garage space (ie internal dimensions exceed required 5.8 wide x 6.0 deep);
- Overlooking of adjacent and more remote private habitable areas, provided by the range of lower to higher building levels, towards the south west through to the north west be minimised by further design and mitigation techniques to external window and balcony placement, orientation, vertical and horizontal screening;
- Caparking design and dimensions be reviewed to improve convenient and efficient on-site circulation, space useability and conformity with AS2890;
- Car parking on-site be allocated to ensure:
 - at ground level a minimum of 18 spaces be provided (additional 7 spaces or commercial floor space and dwellings be commensurately reduced);
 - no restricted access to ground level during operating times for commercial activities and residential visitors;
 - a minimum of 8 spaces be allocated in the secure basement parking area for use by staff of the commercial tenancies;
 - double stacked spaces are for the same dwelling;
- Protuberances or similar traffic management treatments as agreed by Council be provided in Opey Avenue at the developers cost to mitigate and discourage vehicle movements to and from the development to the west of the site;
- Payment be made for each of the Regulated and Significant Trees to be removed in accord with Council's Urban Trees Fund within 30 days of the date of the development approval;
- Non-residential land uses not operate outside the hours of 7.00am to 10.00pm Monday to Saturday and 9.00am to 9.00pm Sunday;
- Café/restaurant not operate outside the hours of 7.00am to 11.00pm Sunday to Thursday and 7.00am to 1.00am the following day Friday and Saturday;
- Waste and servicing vehicles be a maximum length of 8.8 metres and enter from, and exit to, Unley Road and via a right turn in to Opey Avenue to ensure the most effective turn path geometry and least impacts;
- Waste and service vehicles only visit the site between 10:00am to 4:00pm Monday to Saturday, excluding Sundays and public holidays;

- Waste servicing accord with the Waste Management Plan and consolidate spaces, allow for compaction and optimise use of larger 1100L bins wherever possible to reduce the number of required collections per week to 9 or less;
- Public realm configuration, alterations and damage in relation to footpaths, verges, encroachments, outdoor dining, crash protection, street trees etc are to be resolved with, and approved by, the Council at the expense of the owner/applicant;
- A detailed stormwater management plan with accompanying calculations shall be submitted which demonstrates the retention/detention volumes to ensure the flow rates discharging from the development are less than or equal to the lesser of pre-existing development or 80% impervious site coverage, and include:
 - stormwater from non-permeable surfaces (eg roofs, courtyards and carparks) collection on-site, treatment, detention and optimised onsite reuse for grey water, eg toilets and landscaping irrigation;
 - rainwater detention and retention tanks be sensitively incorporated into plans without compromising other required functions or overall design with scale, location and screening of screen
 - Street outlets to the street be limited to 4 litres per second each and a maximum of 8 outlets that should be distributed equi-distant and as generously separated as possible along both the Unley Road and Opey Avenue street frontages;
 - connections to the main infrastructure be upgraded to provide sufficient capacity to accept the additional flows generated during a 1 in 10 year storm event;

The preceding shall be carried out in consultation with Unley Council and to the satisfaction of the Development Assessment Commission;

- A Construction Management Plan be resolved with Council to guide the requirements and operations during construction to avoid traffic, parking, pedestrian and amenity issues;
- It is requested a Note be added indicating pursuant to the policy of the City of Unley On-street Parking Exemption permits are not issued for occupants of new development (post 2013).

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 an informal 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.

The nature of the large scale mixed use development generally accords with the Urban Corridor Zone intent. However, the highlighted areas of concern with

planning design and council infrastructure matters 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 or 8372 5185.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Tsokas', with a long horizontal line extending to the right.

Peter Tsokas
CHIEF EXECUTIVE OFFICER

State Commission Assessment Panel
G.P.O. Box 1815,
ADELAIDE SA 5001

Dear Sir,

I advise that this Agency has ~~the attached~~ **the report** to make on the proposed development described below.



Reporting Officer

19/6/18
Date

DAVID BROWN
PRINCIPAL POLICY PLANNER
CITY OF UNLEY

Council	City of Unley
Application Number	090/M005/18 (APPIAN ID 3209)
Type	SCAP
Applicant	Citify and BFC Pty Ltd C/- Future Urban Group
Locality	248 Unley Road, Hyde Park
Hundred	Adelaide
Planner	Karl Woehle



Reference: 2018/10998/01
Contact Officer: Karl Woehle
Telephone: 0871097056

Level 5, 50 Flinders Street
Adelaide SA 5000

GPO Box 1815
Adelaide SA 5001

Telephone: 08 7109 7060
ABN 92 366 288 135

<http://www.dpti.sa.gov.au>

07 May 2018

Dear Sir/Madam

INFORMAL REFERRAL

The State Commission Assessment Panel (SCAP) has received the development application described below (all relevant documentation is attached). The SCAP is seeking comment from your Council to assist it in reaching a decision and would appreciate a response within **6 weeks** of receipt of this correspondence. Should no report be received by the SCAP within that period the SCAP will deem that you have no comments to make on the proposal.

Council's comments will not include a full planning assessment of the application, but may include comments on any local strategic issue, policies or plans. This may include comments on proposed policy amendments, planned public realm improvements, traffic management, waste services, encroachments, local heritage issues or the like for consideration by SCAP. Council may also make brief observations in relation to planning assessment matters from a local perspective to highlight key issues that may require further analysis / assessment by SCAP assessing officers.

Your co-operation in using the attached form when replying would be appreciated.

Yours faithfully,

For **STATE COMMISSION ASSESSMENT PANEL**

Council	City of Unley
Application Number	090/M005/18 (APPIAN ID 3209)
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