

12 January 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 Sir/Madam

**INFORMAL REFERRAL - FURTHER COMMENTS ON AMENDMENTS
DA 090/M008/17 (APPIAN ID 2397) - 244-246 UNLEY ROAD UNLEY**

Thank you for the opportunity to further review the applicants response to the public consultation, agency advice and informal council referral comments (9 October 2017) on the above-mentioned application to assist the assessment process.

The information forwarded on the 18 December 2017 to the contact officer was not able to be reviewed until after the 8 January 2018 upon their return from leave leading to the delay in this response.

Council wishes to provide further comment on key matters not addressed as part of the applicant's response and re-design that require greater consideration and assessment.

Concerns remain with the degree of variation from key planning policy parameters and impacts upon local road public realm and infrastructure of the proposed development at 244-246 Unley Road, Unley, that require further consideration as part of the assessment process, including:

- Building height to 7 storeys (24.5 metres) versus policy of 5 storeys (18.5 metres) represents a substantial variation (more than 30%) over derived policy height, desired corridor urban design and scale, expectations resolved with community through policy amendment process and visual dominance from adjacent outlooks;

- Unley Road context framed on maximum of 5 storeys with intended intensification and rise in scale within District Centre to 5 to 7 storey in dominant southern half (7 to 9 storey only in portion north of Arthur Street);
- Building setback at ground level of 2 metres from Hart Avenue (from 20 metres from Unley Road alignment) is not provided whereby there could be relief and articulation to building mass in streetscape and further site landscaping opportunities;
- Public Realm disruption by virtue of building intensity, lack of relief and servicing needs (waste trucks) leading to a major loss of on-street parking potential, compounded by current high demand and inadequate proposed on-site parking, and impact and potential for street trees. A comprehensive traffic and parking study will be required to address the appropriate configuration and management within Hart Avenue;
- Outdoor dining only indicated as notional vision (but overhead portal encroachment in Hart Avenue still included on elevations – any encroachment needs to be excluded from planning approval) but as previously outlined there will be severe limitations to ability for encroachment given narrow road width, vehicle movement requirements and essential design parameters for road reserve;
- Overlooking, within development but particularly to adjoining low density high amenity residential areas, requires minimisation by effective design, interruption and screening, not only just distance (30 metres) which is effective in 2 storey scenarios but not from higher viewing aspects, ie 3 to 5 or 7 storeys;
- On-site parking provision, allocation, design and dimensions not fully addressed. The intensity of development is excessive and has been increased by 80m² of additional shop floor space (610 to 690m² – albeit from scaling plans appears applicable ‘gross leasable’ or ‘total floor area’ may be more like 710m²) while the available ground level visitor parking has been reduced (25 to 18 spaces – assume claimed 19th space is in south east corner but this is required as turn-around space for dead-end isle) to create a shortfall of 3 visitor spaces per already favourable discounted mixed use standards (further discounting is unwarranted).
The provision will not take account of extra demand from a potential outdoor dining area.
While in accord with standards, it is noted 3 dwellings will have no on-site parking (52 individual spaces and 4 double stacked spaces provides access for 56 dwellings out of the 59 proposed).
Any on-site shortfall is significant and compounds the problems with inadequate and major loss of potential on-street parking. Development intensity (shop floor area and building scale) should be reduced accordingly;
- Site landscaping and environmental sustainability is lacking, with required 7% for deep soil zone and medium to large trees not addressed within design, creating a harsh and hot local amenity.

Council has delegated to the Chief Executive Officer or his nominee(s) the authority to negotiate appropriate outcomes in regard to street trees, future public realm upgrades, canopy encroachments and outdoor dining arrangements should the application be approved and these matters pursued.

Any approval should include a range of reinforcing conditions, including:

- Caparking design and dimensions be reviewed to improve convenient and efficient on-site circulation, space useability and conformity with AS2890;
- Ground level on-site car parking not be allocated in any way, be well signed and remain freely available for visitors at all times;
- Overlooking minimisation to adjacent low-density residential properties be improved by a range of mitigation techniques;
- Waste and service vehicles (maximum 8.8 metres length) only visit the site between 7:00am to 7:00pm Monday to Saturday, excluding public holidays and peak traffic periods of 7:00 to 9:00am and 4:00 to 6:00pm Monday to Friday;
- Waste Management to accord with the SA Better Practice Guide for Waste Management for Residential and Mixed use Developments (Zero Waste) and larger 1100 litre bins be used to reduce the number of required collections;
- Public realm re-configuration and damage be resolved with, and approved by, the Council at the expense of the owner/applicant;
- Stormwater management on-site accord with submitted details with a maximum of 8 outlets distributed equi-distant along Unley Road and Hart Avenue frontages;
- A Construction Management Plan be resolved to guide the requirements and operations during construction to address traffic, parking, pedestrian and amenity issues.

In addition it should be added as a note that pursuant to Council's policy it will not grant 'On-street Parking Exemptions' from parking time limits to any new residential premises.

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 State Commission Assessment Panel.

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



Peter Tsokas
CHIEF EXECUTIVE OFFICER