

7 March 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  
Department of Planning, Transport and Infrastructure

Dear Sir/Madam

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

Thank you for the opportunity to review the applicant's response to the issues raised by SCAP in deferring consideration of assessment of the above-mentioned application at its 25 January 2018 meeting.

The amended information was forwarded on the 2 March 2018 to the contact officer but was not able to be reviewed until after the 5 March 2018 upon their return from leave. Given comments were requested by the 7 March 2018, time was limited for a comprehensive review.

Council wishes to provide further comment on key matters included in the applicant's response and revised design for consideration as part of the assessment by SCAP.

Concerns remain with a number of planning matters, good design outcomes and impacts upon local road parking and public realm from the proposed revised development at 244-246 Unley Road, Unley, including:

- Building height is unchanged at 7 storeys (overall 24.5 metres and street wall height of 20.6) metres versus policy of 5 storeys (18.5 metres). While levels above street wall (over height) are recessed at top edge from close-by views the increased heights will still be visually dominant from adjacent outlooks and along Unley Road. It also still represents a substantial variation (more than 30%) over derived policy height, desired corridor scale and urban design principles and expectations resolved with the community through the policy amendment process;
- 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 now at 2.1 metres from Hart Avenue (only required for portion from 20 metres from Unley Road alignment) plus DPTI required corner cut-off of 4.5x4.5metres. This provides relief to Hart Avenue but no important softening landscaping opportunities have been indicated. Further the upper levels have not changed, leaving them in line with the podium, reducing a desired relief and articulation of the building mass;
- Outdoor dining is not indicated and assumed it may be intended to be contained within the site. Any notional overhead portal encroachment in Hart Avenue should be excluded from the plans and approval. There will be severe limitations to the ability for encroachment given the narrow road width, vehicle movement requirements and essential design parameters for the road reserve;
- Overlooking, particularly to adjoining low density high amenity residential areas, requires minimisation by effective design, interruption and screening, not just distance (eg 30 metres only is effective in typical 2 storey scenarios). The additional consideration and vine covered selective vertical screening panels (detailed outline of screen louvres not provided) is positive and may encourage oblique views in some cases but still leaves extensive open viewing opportunities to adjacent residential properties. Limited height and width of proposed trees in the rear driveway limit any effect on higher levels views;
- The commercial floor area (café, retail, office and/or consulting rooms) is reduced, due to the Hart Avenue setback, to 616 NFA (assume indicates Nett Floor Area) whereas scaling from plans indicates the applicable 'Gross Leasable Floor Area' is more like 660m<sup>2</sup>. At 3 spaces per 100m<sup>2</sup> GFA a minimum of 20 spaces are required.  
The available ground level visitor parking has been maintained at 18 spaces (space in south east corner is required turn-around space for dead-end isle) leading to a shortfall of 2 visitor spaces per already favourable discounted mixed use standards (further discounting is unwarranted) and compounded by loss of adjacent available on-street parking.  
This provision does not take account of extra demand from a potential outdoor dining area adjacent to Hart Avenue of say 25m<sup>2</sup> (additional 0.75 space) leading to a shortfall equivalent to 3 spaces.  
Development intensity (commercial floor area and building scale) should be reduced accordingly to suit provision.  
The provision addresses the required 15 residential visitor spaces in a complementary peak shared arrangement.  
It should be a condition of approval that spaces in the limited grade visitor parking area not be allocated to ensure optimisation of their efficient utilisation;
- The underground parking areas for the 59 residential apartments (20 x 1 bedroom or < 75m<sup>2</sup>, 35 x 2 bedroom and 4 x 3 bedroom) requires 65 spaces versus the 64 provided, which includes 4 small spaces and 11 double stacked spaces. For the 59 dwellings proposed this results in 6 dwellings having no on-site parking with only 53 having individual access (11 of the larger dwellings have double stacked provision). Individual access provision should be increased by one or the number of dwellings reduced by one to suit provision in accord with minimum standards;
- An on-site parking shortfall is critical and is compounded by the problems with inadequate and consequential significant loss of potential on-street parking. Hart Avenue is very narrow and the current parking arrangements results in one-way movement. Currently there is a very limited number of movements in the

street and access to the subject site.

With the increased intensity of development, sole access to Hart Avenue, number of vehicle movements and regular large waste vehicle services (average of more than twice per day) retaining the current parking configuration is not appropriate, safe or effective.

At best the applicants proposed reconfiguration results in a net loss of 2 spaces. The recommended parking reconfiguration for safe and appropriate traffic movement will result in a net loss of 8 spaces (half of that available along the adjacent street frontages). The removal of parking on the southern side of the street is preferred to provide for safer left turns into Hart Avenue.

Such loss reinforces the critical need for at least the minimum required parking on-site.

A comprehensive traffic, parking and streetscape study will be required to address the appropriate configuration, management and streetscape (trees and landscaping etc) treatment within Hart Avenue;

- The addition of required deep soil zone (assumed to be at least 7% of the site area) and number of medium scale trees along the western edge of the rear main driveway is positive but of limited effect. A fully resolved comprehensive and softening site landscaping proposal is lacking.

The tree species / form selection is queried and a more robust and fuller canopy species and number would be suggested as preferable.

The correlation of the tree positions, driveway configuration and waste truck swept path turning movements are difficult to reconcile, but it appears the trees near Hart Avenue may conflict with the indicated waste truck movements.

Consideration should be given to an enhanced avenue of fuller canopy trees and areas of under-storey / ground level planting within this large driveway space, and the Hart Avenue streetscape frontage, to ameliorate the expanses of hard paving, a harsh and hot environment, streetscape appearance, quality of the expansive driveway internal space and the amenity for the residential frontages thereto and for pedestrians generally (resident, tenant, staff and visitors).

It could be an attractive feature and environment.

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 as raised previously and including:

- Caparking design, dimensions, access/ramps and disable provision be reviewed to improve convenient and efficient on-site accessibility, circulation, space useability and conformity with Development Plan and AS2890;
- Ground level on-site car parking not be allocated in any way, be well signed and remain freely available for all visitors at all times;
- 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 that

larger 1100 litre and co-mingled bins be used as much as possible to reduce the number of required collections;

- Public realm re-configuration and any 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 broadly accords with the Urban Corridor Zone intent. However, the highlighted areas of concern with planning policy accord, proper and good 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](mailto:dbrown@unley.sa.gov.au) or 8372 5185.

Yours sincerely



**David Brown**  
PRINCIPAL POLICY PLANNER