

4 March 2021



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

**Attention: Karl Wohle**  
Planning Officer  
City and Inner Metro Development Assessment  
Planning & Land Use Services | Attorney-General's Department

Dear Commission

**INFORMAL REFERRAL COMMENTS – DA 090/M022/21  
12-16 GLEN OSMOND ROAD PARKSIDE**

Thank you for the informal referral received on the 21 January 2021 of the above-mentioned application lodged with the State Commission Assessment Panel, and invitation for comment within 6 weeks (4 March 2021) to assist the assessment process.

The nature of development encompasses:

*Construction of two, seven storey mixed use buildings with a publicly accessible central pedestrian link. Each building will comprise of; - two levels of commercial space, totalling 722 square metres; - 35 (3 x 1 bed, 29 x 2 bed and 3 x 3 bed) residential apartments and 4 townhouses; - three levels for parking purposes - 43 square metres for bin storage on ground floor; and - shared terrace area on level 2 (320.4 square metres).*

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**

New development is welcomed that leads to the sensitive growth, diversity and enlivening of the city, while maintaining the integrity and amenity of the corridors and character neighbourhoods.

The Urban Corridor Zone (Boulevard Policy Area) and policy parameters derive from well-established urban design principles, comprehensive local ('place') contextual analysis and subsequent extensive community engagement.

It is expected the planning policy would be respected as a well-reasoned and accepted desired character outcome for the zone, precinct, corridor and place.

It is disappointing that after extensive pre-lodgement preliminary review and discussion with the design team prior to lodgement that the proposal still lacks due regard for critical policy and justification for a range of substantial variations which will result in unwarranted long-term issues due to the specific local circumstances and prevent achieving a better design/place outcome (for all).

Generally, the proposal may follow the broad intent of the zone for multi-storey development but there are several noted variations from fundamental policy parameters. Some are limited variations, individually of moderate significance, but some are substantial variations. Taken collectively there is a compounding effect, and consequently this suggests there is a serious variation from applicable Development Plan policy parameters of the proposed redevelopment in its current form.

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

- Building over-height - 7 storey versus 5 storey and extra 4.5 metres (24%);
- Building Interface Envelope observed to rear zone boundary interface, but extra height compounds over-bearing building mass;
- 4.5 metres front Glen Osmond Road setback rather than 6 metres, which accommodates planned road widening but will leave inadequate 'boulevard' setback thereafter and trees as part of road verge;
- 0.0 metre setback to rear Chinner Avenue to integral building façade, albeit small recessed yard/balconies to townhouses;
- No side setbacks at ground level (versus required 3m minimum) for two lower levels, with upper levels setback for apartments amenity, compromising boulevard and landscape setting and building separation;
- Central plaza between towers/stages beneficial, but design needs to ensure mitigation of weather effects and wind tunnelling;
- Building scale and extent compounds over-developed footprint, and excessive building mass, of 85% (allowing for plaza) versus desired policy total of 75%;
- Significant traffic increase (195%) and implications on Chinner Avenue and local network through failure to observe Concept Plan Map Un/3 for primary access to Glen Osmond Road; and access at address, on-site service and distribution of load;
- Waste service vehicle loading from street rather than from on-site, when new development has opportunity to design for on-site service;
- Parking on-site within building and basements is adequate, providing areas are suitably designated for commercial tenants, residents and residential visitors;

- Deep soil meets minimum required through central plaza and front setback (until road widening and becomes part of road reserve);
- Chinner Avenue public realm implications, including impact on street parking, street trees and their necessary replacement, and footpath and verge reconstruction to achieve suitable dimensions and spaces;
- Deficient private open -space and dwelling storage;
- Overlooking may be mitigated by distance and structures along Chinner Avenue but views to some visible spaces and habitable rooms are not minimised by adequate screening;
- Appropriate Stormwater Management with on-site detention and retention to limit discharge to suitable maximum rate;
- 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.

### **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 from a local perspective to highlight key issues that require further analysis / assessment by PLUS officers and SCAP.

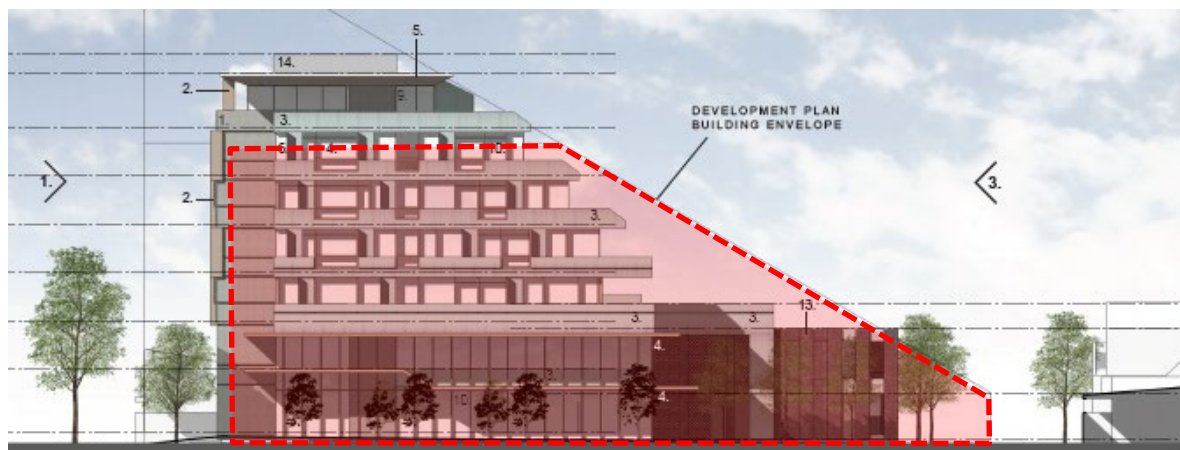
### ***Proposed Development Planning Observations***

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

- Site frontage to Glen Osmond Road 84.7 and to Chinner Avenue 83.7, depth of 48.5 and overall area of approximately 4,085m<sup>2</sup>;
- Development involves a 7-storey mixed use building comprising 725m<sup>2</sup> of commercial / office space on ground and level 1 and 39 apartments above (3 x 1 bedroom, 33 x 2 bedroom and 3 x 3 bedroom) per tower – or 1450m<sup>2</sup> office and 78 apartments in total. Some diversity of dwelling sizes and active ground level frontages, with a net density of over 190 dwellings per hectare, well above desired minimum of 75 d/Ha;



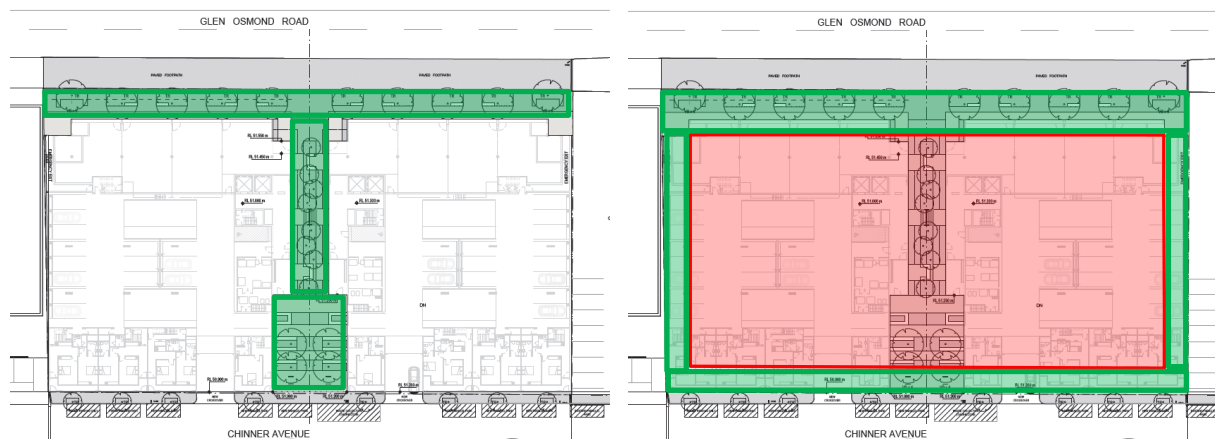
- Height to seven (7) storeys (23.0 metres – not including centralised roof services screen (1.2 metres) and floor level above ground level – 0.3 metres?) versus policy of five (5) storeys (18.5 metres) per Zone Policy Area Desired Character and Concept Plan Un/3. Represents an excessive variation over the total desired height by 4.5 metres (24%);



- The Building Interface Envelope (30 degrees at 3m) from the zone boundary is to limit over-bearing building mass, overshadowing and provide a proper and orderly demarcation for diverse development. The excessive height compounds the over-bearing building mass to the low-density residential dwellings in Chinner Avenue;
- Primary Glen Osmond Road 4.5 metres setback in lieu of required 6.0 metres, which will accommodate planned road widening and in long-term leave 0.0 metres setback to Glen Osmond Road;
- Secondary Chinner Avenue 0.0 metres setback to enclosed courtyard / balconies crowding physical and social space to narrow street and footpath, in lieu of required 3.0 metres setback;
- Side boundaries 0.0 metres setbacks at 2 lower levels, in lieu of required 3.0 metres, providing no separation and landscaping to future adjoining development;
- Two stages/towers with consolidated central plaza is a positive but enlarged building footprint and reduced boundary setbacks compromise Glen Osmond Road boulevard, Chinner Avenue amenity and overall landscaped setting;

Building footprint 85% (15% green)

Max Policy footprint 75%



- Central plaza design needs to address the mitigation of weather effects and in particular wind tunnelling to ensure appropriate pedestrian amenity;
- Deep soil (minimum required 15% for sites over 3,000m<sup>2</sup> or 7% if separate 2 stages and sites between 1,500 and 3,000m<sup>2</sup>) exceeded through central plaza with trees (approximately 8%) plus front setback and trees (approximately 9%) but only until road widening and then becomes part of road reserve;
- Building and footing excavation at boundary to Chinner Avenue poses impacts to existing street trees leading to their necessary removal and replacement. Current species are mature and less desirable supporting replacement, but the space made available in narrow street with 0.0 metres building setback compromises planting and particularly canopy space for appropriate tree replacement, forcing need for streetscape upgrade and protuberances;
- Scale of consolidated development leads to a significant increase in vehicle movements on Chinner Avenue, and rather than distribution of access points and movements per general policy and specifically Concept Plan Un/3 primarily to Glen Osmond Road and secondary access to local streets, the proper and orderly long-term development outcomes and traffic management are considered severely compromised. The estimated trip generation for the new development is estimated to be 71.7 trips in the AM peak and 55 in the PM peak. This implies an estimated increase of approximately 600 vehicles per day (vpd) (based on 10 per cent peak hour flows). The traffic assessment has calculated that the current land uses have a theoretical trip generation of approximately 350 vpd, however the current land uses also have shared distribution with two access points off Glen Osmond Road and three access points off Chinner Avenue (and therefore it cannot be assumed that all trips used Chinner Avenue). With an existing mid-block traffic volume along Chinner Avenue of about 405 vpd (based on 2018 data), assuming conservatively 50 per cent of the theoretical trip generation of 350 vehicles used Chinner Avenue, this would result in approximately an additional 425 vpd along Chinner Avenue (which is a 105 per cent increase on existing mid-block volumes);
- With further such envisaged major development along the rest of Chinner Avenue, this will inevitably lead to excessive pressure, conflict and dis-function of Chinner Avenue, the narrow local roads network and tight intersections, also particularly noting all servicing and waste collection is expected to take place on Chinner Avenue.

- The planned for, and a possible, consolidated primary access(s) to Glen Osmond Road would provide access to the development address, distribute traffic load and enable service / waste vehicles to be accommodated on-site as intended by the Development Plan;
- Waste service should be from on-site, with forward entry and exit. A new building design can include this and utilise Glen Osmond Road crossover(s) as outlined above to afford orderly and proper site servicing;
- On-site vehicle parking appears adequate to meet demand, guided by appropriate standards, including vehicle stackers for multiple spaces for larger dwellings. Additional sharing of commercial parking for residential visitors could be facilitated by limits on commercial land use to ensure complementary peaks with residential demand;
- Bicycle parking is generous for commercial users and residents within the basement and buildings, with provision for visitors at ground level less clear, albeit there appears to be bike racks to the front of offices and ample space in plaza to address needs;
- Storage areas for the residential apartments are a combination of internal and associated with basement carparks but are short of required minimum volume;
- Open-space on balconies and privacy screening is acknowledged as below required minimum provisions without reasonable cause and to detriment on long-term living amenity;
- Overlooking may be mitigated by distance to neighbours and number of screening structures along Chinner Avenue but parts of some rear yards and upstairs habitable rooms are still visible. Deep planters to balconies and shared terrace could include vertical obscure screen panels within planting to form a minimisation of views above minimum low balustrade height;
- 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. Deep soil, trees, general landscaping and green courtyard/balcony planting is generally positive.

Overall, the proposal has several 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 access, traffic, parking and waste servicing



- Stormwater management

### ***Encroachments***

#### **Footpath Canopies**

No encroachments of the public realm are evident.

### ***Public Realm / Street Trees***

#### **Public Realm**

Chinner Ave frontage currently has a range of buildings to the street but also large open spaces. On south-west side are a number of small, separated and varied setbacks of primarily dwelling frontages, some behind garages, and some rear yards, creating an intimate character.

Detailed design of townhouses and central plaza is appreciated, but policy for secondary street requires a 3 metre setback. Proposal has in effect a 0.0m setback and two 2 storey (9m) high 36m long bluff mass of buildings to the site boundaries, and only separated by 12m in central plaza, providing little relief or intimate character.

Without the required setback, residents and visitors are stepping directly out onto the main path of travel along the footpath, presenting possible access issues, as well as CPTED concerns.

The current footpath widths on Chinner Avenue are narrow and irregular, with existing street trees and deep stormwater drain infrastructure and a narrow carriageway. This results in the existing streetscape being inappropriate to accommodate the increased pedestrian and traffic volumes, as well as on-street parking provisions likely to be generated along Chinner Avenue as a result of the development.

The current design has not considered its impact onto the local street network, despite encouragement from Council.

The current footpath / street tree interface shown in the proposal is non-compliant to Council standards. To achieve 'standard' footpath widths of generally at least 1.5 metres, with short 2.0 metre constricted pathway to 1.2 metres for street trees, with street tree locations to be very selective and co-ordinated with on-street parking provision into an integrated street frontage. Greater separation from the site boundary and building is necessary, as well as to distance from overhead powerlines, to provide additional space to enable appropriate larger tree species and canopy for the street, eg *Pistacia chinensis*. The proposed impacts lead to need for a major road re-design and reconstruction.

Parking on-street in Chinner Avenue is limited, mainly to the eastern side and western side a few after hour only spaces. The wider neighbourhood area experiences very high business and resident parking demand and Council has been undertaking ongoing parking management to limit all day commuter parking

and foster greater turn-over. This will impact new occupants, as much as existing. Visitor parking as well as delivery / loading must be incorporated into the site.

Occupants of the new development pursuant to Council Policy will not get exemptions from on-street parking/time controls.

A setback would improve CPTED (Crime Prevention Through Environmental Design) and provide physical and social relief to street, courtyard space, front gardens and better interaction with intimacy in streetscape, and improve the sight distances for entering and exiting vehicles from the minimum width two-way site cross-overs.

Damage, reinstatement and enhanced footpaths and infrastructure will be negotiated further and managed with costs recovery via normal Council procedures from the owner/developer. Council would prefer this agreement be established as part of the SCAP decision.

### Street Trees

There are seven existing large street trees (*desert ash*) on the north-eastern side of Chinner Avenue. They are mature and in fair condition but are not a desirable long-term species. They will be severely impacted by building footing excavation and two-storey high building to the street boundary. A 3.0 metre building setback is desired, or at least varied setbacks (building and basement), to recognise space for appropriately sized street tree and canopy, and complementary on-site planting, to enhance overall streetscape amenity.

Without the setback, Council is concerned the construction works will have a significant impact on the short and long-term health of the existing trees, and for that of an appropriate size of new replacement trees. Retention of existing trees and large tree canopy across Unley is of strategic importance to the Council and its community.

Removal and replacement of mature planting is unfortunate, but if necessary can be supported if appropriate species and placement can be addressed. The existing narrow and inferior street verge, combined with the omission of the building street setback, results in insufficient space to accommodate for a compliant footpath and regularly spaced tree pits.

Greater design consideration is required to establish an integrated street frontage that overcomes the challenges presented by the development through effective design and management of new public realm, materials, street infrastructure, parking and sustainable street tree planting (canopy).

Discussions have occurred with applicant/developer on Council minimum requirements and potential additional opportunities to collaborate and mutually contribute to an enhanced public realm.

Council have been willing to support further investigation to overcome the challenges identified with the development. The current proposal is considered



insufficient and Council seek to agree a preferred design solution and in-principle agreement to shared contribution with applicant/developer on the public realm elements, prior to approval.

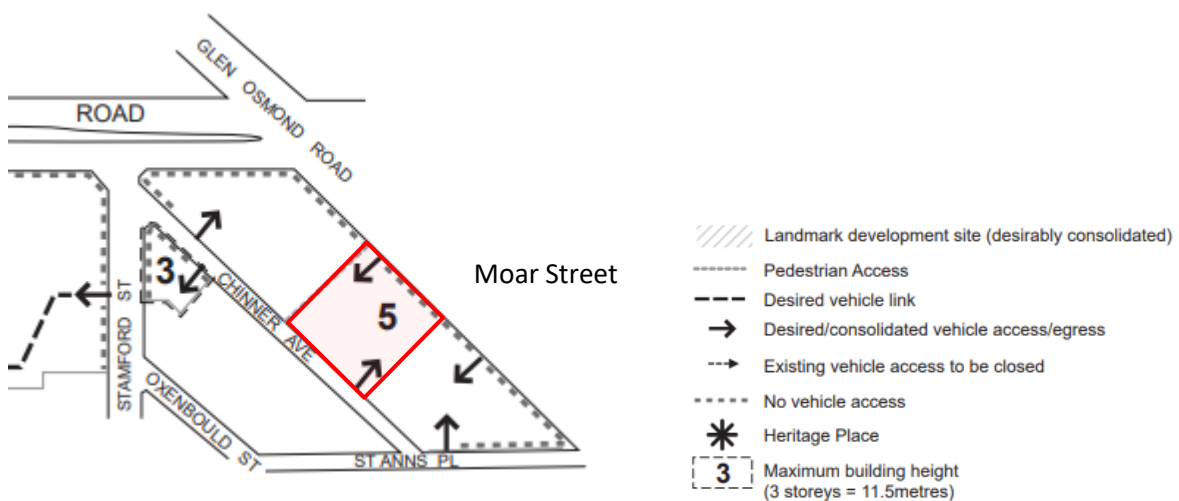
Establishment of large street trees to Glen Osmond Road is positive. Their location should be sufficiently recessed from current carriageway so that they remain as part of the new road verge and footpath into the long-term considering the proposed 4.5 metres road widening. The public bicycle racks, eg north east and south east corners, should be appropriately relocated, preferably to main pedestrian entry points and near central plaza, and all trees aligned so as to be preserved in the long-term new verge for Glen Osmond Road.

Any damage, additional planting and reinstatement of footpaths and infrastructure will be negotiated further and managed with costs recovery via normal Council procedures from the owner/developer.

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

Vehicle Access and Egress

The City of Unley Development Plan - Concept Plan Map Un/3 for this section of Glen Osmond Road specifically seeks vehicle access from both Glen Osmond Road and Chinner Avenue to distribute and share traffic load.



It is critical vehicle access be shared and be primarily to Glen Osmond Road to release pressure on Chinner Avenue (and the connecting local street network) and ensure future capacity for other envisaged future similar corridor major development of sites to the south;

It is acknowledged a reasonable extent of the southern portion of the Glen Osmond Road frontage is within the access restriction area of the relevant Australian Standard (AS/NZS 2890.1:2004) to avoid conflict with Moar Street opposite the site. The right turn movements out of this street are negligible and, in all likelihood, will be prevented in the near future, removing the impediment to access for the subject site to Glen Osmond Road. In addition, the current access points to the site on

Glen Osmond Road are located in the designated access restriction area and have functioned with only one crash occurring at Moar Street intersection over the last five years (2014-2019), which was a rear end crash resulting in property damage only.

In any event, the northern frontage portion is suitable and could be effectively achieved without conflict with the arterial road, eg left in and left out. If only one access point is achieved at the northern end an internal driveway connection could be made to service the second southern stage.

An alternate access point away from Chinner Avenue will provide a considerable benefit to provide occupants choice of movement and may minimise some of the impact the increased traffic movements and resulting anticipated network congestion of adjacent streets that will arise as a result of the development currently proposed.

In addition, the current proposal can accommodate access from Glen Osmond Road, which may not always be possible in the future development potential within the block (and associated traffic generation). There are several sites, including 28, 34, 36, 40 and 52 Glen Osmond Road that are likely to result in a future major development. By having all vehicle access including loading and unloading activities on Chinner Avenue, this will severely impact the proper and orderly ability for the future development of these sites.

From an urban design perspective, a drive-way cross-over on Glen Osmond Road could be designed in such a way that it still maintains good urban amenity, the footpath and a possible future shared use path. This should not be used as a reason not to provide access point(s) on Glen Osmond Road, particularly with a frontage width of over 85 metres.

A Glen Osmond Road access/egress will also provide an 'address' for access and convenient on-site dedicated shared parking area(s) for businesses and residential visitors, and more importantly appropriately cater for servicing/deliveries to the commercial premises fronting Glen Osmond Road. Noting that Chinner Avenue is not directly accessible from Glen Osmond Road or Greenhill Road, the visitor and servicing/delivery access to the new development only via Chinner Avenue is not considered legible or reasonable.

A Glen Osmond Road access is considered essential to cater for the commercial component and a level of residential demands of the mixed-use development that is planned to front Glen Osmond Road and the associated visitor (commercial and residential) and delivery vehicle parking.

It is noted that the width of the proposed new driveway cross-overs on Chinner Avenue meet Australian Standards at 6.0 metres, however, noting that the access points are intended to cater for resident, business staff, visitors and servicing/deliveries with multiple movements throughout the day, and a range of vehicle types, a wider cross-over that exceeds minimum width is recommended to improve access / egress and safety.

Sight lines to and from the driveway access points will also need to be designed in accordance with Australian Standards for *entering sight distance* and *sight distance to pedestrians*. The current building to property boundary and minimum driveway width, and unspecified fence detail and large solid corner columns, appears to provide very limited and obscured unsatisfactory sight distance and views.

### Traffic Assessment

Estimated traffic generation rates have been based upon the NSW RTA '*Guide to Traffic Generating Developments*'.

The estimates are based upon a theoretical generation for existing development of approximately 350 vehicles per day (vpd) (37.5 AM and 32.5 PM peak hour as 10% of daily volumes). Only a portion would traverse Chinner Avenue versus mostly Glen Osmond Road, and much of the current warehouse facility in practice has been under-used for some time. The CIRQA traffic assessment has assumed all theoretical trips generated from the current land uses traverse Chinner Avenue, significantly underestimating the likely impacts. Taking a very conservative approach of a 50:50 split on Glen Osmond Road and Chinner Avenue, this would make the theoretical trip distribution on both roads from the current land uses 175 vpd.

The proposed development is estimated to generate over 600vpd (71.7 AM and 55.0 PM peak hour as 10% of daily volume). Relative to the above assessment and direction of all traffic to Chinner Avenue, its existing average 405 vpd (based on 2018 data) would be increased by approximately 425 vpd increasing the total to about 830 vpd (195 per cent increase).

It is noted that the CIRQA traffic assessment has assumed a traffic split of 60 : 40 (Stamford versus St Annes), which seems a reasonable assumption (although the current split is shown to be 70 : 30). However, noting the traffic count is mid-block and undertaken in 2018 the assumptions made will depend on where the counter was placed in the context of the new proposed development.

If a primary Glen Osmond Road access were available, as sought by Council, the secondary access increase to Chinner Avenue could be limited to a more modest and appropriate increase for the type of street.

In addition, the traffic assessment has not considered the future development potential within the block (and associated traffic generation). There are several sites, including 28, 34, 36, 40 and 52 Glen Osmond Road that are likely to result in a future major development. By having all vehicle access including loading and unloading activities on Chinner Avenue, this will severely impact the proper and orderly ability for the future development of these sites. The Development Plan policy and Concept Plan Un/3 are provided to address orderly and proper planning for the subject precinct.

The traffic assessment references to Chinner Avenue as a local road that should be able to accommodate up to 1,500 vpd, is based on the [Parkside LATM](#), Table 4.2 labelled *Traffic warrants in the City of Unley City*. This is considered a simplistic

approach, as often when considering LATM measures, other factors are also considered – such as road width, levels of rat-running, parking demand, safety etc.

Below is a summary table of the surrounding streets, with similar characteristics and all with traffic volumes less than 500 vpd. The only street with higher volumes is Stamford Street, however it should be noted that City of Unley just recently installed single lane Driveway Links at the intersections of Stamford Street and Oxenbould Street with Young Street to support further reduction in traffic flows along these streets. This implies that using the value of 1,500 vpd (as the upper limit) for a street like Chinner Avenue is not appropriate.

Street Name	ADT*	NB:SB or EB:WB	Road width (m)
Stamford Street (St Annes to Alfred Street)	1049	75:25	8.5
Oxenbould Street	271	69:31	8.6
St Annes Place	264	46:54	8
Chinner Avenue	393	70:30	7.3

ADT\* = Average Daily Traffic

eg NB+ = North Bound

The traffic assessment also states that both Chinner Avenue intersections with Stamford Street and St Annes Place are able to accommodate the additional traffic, however it is clear that these intersections are tight with unique characteristics that have issues currently, albeit are manageable due to the current traffic volumes.

**St Annes Place intersection:** with parking permitted on both sides of the road along St Annes Place, any additional traffic from current volumes, will likely create access and safety concerns by the local residents and businesses. Parking will likely need to be banned on one-side of the street to facilitate the increased traffic flow, which would generate significant community/business implications and trading issues and would not likely be supported noting the high parking demand in the area.





**Stamford Street intersection:** the current intersection is not designed to cater for heavy/large vehicles and or increased traffic flows due to its proximity to Greenhill Road and T-junction arrangement with Stamford Avenue. As mentioned, the current directional split of traffic is 70 per cent northbound, and hence the new development under its current configuration would likely double (if not triple) the current vehicle movements traversing this intersection.



City of Unley's position is that the form and capacity of Chinner Avenue and the connecting local street network and intersections at St Annes Place and Stamford Street cannot safely or efficiently accommodate anticipated increase in traffic movements as a result of the development, viz it is essential movement is primarily via Glen Osmond Road to share load.

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. Due to its close proximity to the CBD and existing businesses along Glen Osmond Road, the existing streets are managed with timed parking and it is recognised there is limited day time parking available within the local area. The Construction Management Plan should incorporate alternate parking provision for trades associated with the construction, as well as consideration of deliveries, loading and lay-down zones.

### Vehicle Parking

On-site parking should be adequate to meet demand, guided by appropriate standards.

Table Un/5 standards for residential development in higher density mixed use development are applicable. The parking standards are already substantially discounted for mixed-use, availability of on-street parking, cycling and public transport.

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) the required car parking is as follows:

Land Use	Scale	Rate	Required	Provided
<b>Office/Consult</b>	722 m <sup>2</sup>	Min 3 / 100m <sup>2</sup> gla		
<b>Ground</b>	337 m <sup>2</sup>	Min 3 / 100m <sup>2</sup> gla	10.1	
<b>Level 1</b>	385 m <sup>2</sup>	Min 3 / 100m <sup>2</sup> gla	11.5	
<b>Basement</b>			22	22
<b>Total (x 2 towers)</b>	1,444 m <sup>2</sup>		44	44 <sup>+</sup>
<b>Apartments</b>				
<b>1 bed or &lt; 75m<sup>2</sup></b>	3	0.75	2.25	
<b>2 bed or &gt; 75m<sup>2</sup></b>	33	1.25	41.25	
<b>3 bed or &gt; 150m<sup>2</sup></b>	3	1.75	5.25	
<b>Total</b>			48.75	50
<b>Visitor</b>	39		9.75 <sup>+</sup>	10 <sup>+</sup>
<b>Basement</b>			58.5	60
<b>Total (x 2 towers)</b>			117	120
<b>Basement</b>				
<b>TOTAL (x 2 towers)</b>			<b>161</b>	<b>164</b>

- + Including disabled space – shared and used out of commercial hours for residents' visitors
  - \* 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"

This indicates an adequate provision of on-site parking, including use of stackers for multiple carparks allocated to larger dwellings.

Car park space designation and allocation should be reviewed, to ensure respective spaces are allocated within the on-site areas for commercial tenants and visitors, residential occupants and visitors. Given all parking is confined within the building clear direction should be provided to these areas and in particular to encourage and facilitate use and entry to building by visitors.

As stated above, if the current proposal is approved, it will result in the loss of existing on-street parking to manage increased vehicle volumes along Chinner Avenue, as well as approaching key intersections on St Annes Place and Stamford Street. On-street parking is currently in high demand in the local area, and the further loss of capacity as a result of the development and its variation from policy would be regrettable.

### Bicycle Parking

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
<b>Shop/Office/Consult</b>	1,444m <sup>2</sup>			
<b>Employee (basement)</b>		1/150m <sup>2</sup>	9.6	20
<b>Visitor (ground level)</b>		2 + 1/500m <sup>2</sup>	4.9	12
<b>Residential</b>	78			
<b>Resident (basement)</b>		1 / 2 dwellings	39	58
<b>Resident (level 1)</b>				20
<b>Visitor (ground level)</b>		1 / 6 dwellings	13	8
<b>Resident (level 1)</b>				20
<b>Total</b>			66.5	118
<b>Employee / Resident</b>			49	98
<b>Visitor</b>			18	20

Generous overall bicycle parking is provided, with shared use of commercial racks on Glen Osmond Road frontage necessary for residents as well. Racks may also be better placed in the front central area of the plaza.

Dedicated areas for employees, resident occupants and public visitors within the basement carpark should be allocated and designated to meet the respective needs.

The public bike parking shown to the northern and southern ends of the Glen Osmond Road frontage should be relocated to adjacent the main thoroughfare (central spine) and higher profile / popular pedestrian routes with greater passive surveillance.

Consideration needs to be given to the navigation of cyclists through the site/building and to the dedicated bicycle parking areas to avoid undesirable conflict with vehicles within the carpark areas and particularly at the entry and egress points. Ideally separated movement paths for bicycles to enter and exit the site, building and parking areas should be considered.

### Waste Servicing

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

Routine collection is indicated to occur 4 times per week for multiple bins for each service. Specific additional irregular pick-ups, eg hard/e-waste, will occur on an as needs basis.



Collection times have not been nominated but it is acknowledged they will need to minimise impacts to residents and conflict with peak traffic periods. Between 10:00 am to 3:00pm Monday to Saturday is considered most favourable.

On-site waste management arrangements appear adequate, but waste vehicle servicing is proposed to occur from Chinner Avenue, either from a necessary dedicated loading zone or wide cross-over to allow reversing into the site (central plaza).

This is contrary to policy which requires such servicing occur on the site, desirably with forward access and egress, and without disruption to on-street parking already in short supply and high-demand.

The City of Unley Development Plan policy requires waste servicing to be made on-site for these types of developments. This is to avoid unreasonable traffic impacts and disruption associated with the large vehicle movements.

In addition to the anticipated waste servicing the development will generate a number of loading and unloading service vehicle activities (e.g. deliveries, removal trucks, servicing of commercial/office premises etc), which will also create issues on street. A proper on-site solution should be catered for with such a new and large development. Glen Osmond Road access, with adequate head height for front area of site and access to bins stores, could address this.

It is appreciated that there may be existing sites where waste activities may take place from the street, however noting this is a new development it is important that it complies with policy, proper practice and minimises any future impacts to the street – especially noting the future development potential within the block. In addition, a loading zone would be publicly available, and therefore Council could not guarantee that the loading zone would be available for waste collection purposes.

Reference is made to other examples including the St Johns centre and the on-street collection. It should be noted that this provision takes place at their driveway crossover, and not through the provision of a dedicated loading zone. In addition, this was a Crown development and not an appropriate or desirable example of good practice. Development Plan policy and consistent practice for new development is for service to be conducted on-site, preferably with forward entry and exit.

While the proposals are undesirable and not supported, the outcome of the SCAP decision will dictate what has to be accepted and arrangements made on-street, with the support and appropriate contribution of the applicant/developer.

### ***Stormwater Management***

The existing development has a limited pervious and high impervious area. However, the maximum runoff flow rate for commercial development should be less than pre-existing or less than equivalent of 80% impervious (20% pervious)

whichever is the lesser in accord with City of Unley '*Development and Stormwater Management Design Guide*' to manage appropriate site discharge.

On-site stormwater management has been addressed to satisfy council's requirements for a 0.75 run-off coefficient. Provision has been indicated for 15m<sup>3</sup> in each stage or 31m<sup>3</sup> in total on-site storage for detention / retention to address required peak stormwater outflows and water reuse etc. The conclusion of the report does not correlate with the body by reference to 8m<sup>3</sup> for each stage rather than 15m<sup>3</sup> for each as per calculations within the report – which needs to be noted and remedied.

Site and floor levels will need to be refined subject to final design and design treatments to final road, drainage and footpath levels but they should ensure 300mm clearance to 1:000 ARI flood levels in all cases. Reference should be to top of kerb (not top of water table), subject to required higher depth of new kerb and water table, and in all cases ensuring minimum of 300mm free-board above any 1:100 ARI flood levels, including anticipated street stormwater flood overflows of footpath.

The existing kerb profile is irregular and oversized in height to manage local drainage and site levels. Further consideration is required to address local levels, access requirements and maintain stormwater flow as part of an integrated street frontage.

The outlets to public roads and stormwater infrastructure to address 1:10 year ARI events should be kept below 4 to 5 l/s. These should be distributed equidistant, and as generously separated as possible, along each of the road frontages.

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

- Car parking 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 and designated to ensure separate provisions for commercial tenants / visitors and residential occupants and visitors, with use of on-site visitor spaces encouraged and facilitated by clear direction signage and marking.
- 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;
- Waste and servicing vehicles be a maximum length of 8.8 metres and enter from, and exit to, Chinner Avenue, ensuring the most effective turn path geometry and least impacts, to afford servicing from on-site;

- 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;
- The two two-way accessways be clearly divided or line-marked to ensure vehicles stay in their path and avoid blocking opposite movement and interrupting on-street movement;
- Overlooking of adjacent private habitable areas towards the south east through to the south west be minimised by further design and mitigation techniques to external window and balcony placement, orientation, vertical and horizontal screening;
- 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;
- The final detailed stormwater management plan shall ensure the retention/detention volumes to ensure a run-off coefficient of equal or less than 0.75 to limit flow rates discharging from the development are appropriate, including:
  - stormwater from non-permeable surfaces (eg roofs, courtyards and carparks) 30m<sup>3</sup> 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;
  - Street outlets to the street be limited to 4 litres per second each and distributed equidistant and as generously separated as possible along road 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 City of Unley Council and to the satisfaction of the State Commission Assessment Panel;

- A Construction Management Plan be resolved with Council and provided with development approval and before commencement of construction to guide the requirements and operations during construction to avoid traffic, parking, operating hours, noise, 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 and observations. 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 a large-scale mixed-use development generally accords with the Urban Corridor Zone intent. However, the highlighted areas are of significant concern to the Council and the long-term impacts of development to the local community. Issues associated with the 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](mailto:dbrown@unley.sa.gov.au) or 8372 5185.

Yours sincerely



**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 ~~no~~ report** to make on the proposed development described below.

David Brown  
Principal Policy Planner

Reporting Officer

4 March 2021

Date

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Dear CITY OF UNLEY

**Application Number:** 090/M022/21  
**Applicant:** Austar Group C/- Future Urban Pty Ltd  
**Proposed Development:** Construction of two, seven storey mixed use buildings with a publicly accessible central pedestrian link. Each building will comprise of; - two levels of commercial space, totaling 722 square metres; - 35 (3 x 1 bed, 29 x 2 bed and 3 x 3 bed) residential apartments and 4 townhouses; - three levels for parking purposes - 43 square metres for bin storage on ground floor; and - shared terrace area on level 2 (320.4 square metres)

**Subject Land:**

12-14 GLEN OSMOND RD PARKSIDE SA 5063  
14 GLEN OSMOND RD PARKSIDE SA 5063  
16 GLEN OSMOND RD PARKSIDE SA 5063  
16 GLEN OSMOND RD PARKSIDE SA 5063

This referral is allocated under the Development Act 1993 and Development Regulations as which requires a Non-Mandatory (6 weeks) response.

The Commission would appreciate a response by the due date of 04/03/2021.

Should no report be received by the Commission by the due date the Commission will assume that you have no objection to, or comment to make on the proposal.

Please access the documents associated with this referral here -

<https://www.dropbox.com/sh/y1n5bx3it01mjj5/AABlIKlqC0PkaddQ59c2yTZ4a?dl=0>

Should you have any questions relating to this matter please contact Janaki Benson of this office.

**Janaki Benson**  
Planning Officer

Development Division  
**Department of Planning, Transport and Infrastructure**

Telephone: 81000000  
Email: [Janaki.Benson@sa.gov.au](mailto:Janaki.Benson@sa.gov.au)