

29 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/M023/21
126 ROSE TERRACE WAYVILLE**

Thank you for the informal referral received on the 15 February 2021 of the above-mentioned application lodged with the State Commission Assessment Panel, and invitation for comment within 6 weeks (29 March 2021) to assist the assessment process.

The nature of development encompasses:

Construction of an eight (8) storey mixed use building comprising residential apartments, café, ancillary car parking, landscaping, 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

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

Unfortunately, with excessive large-scale development of small individual sites an inherent tension arises. However, the primary policy principles and good development outcomes are not obviated.

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

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, where the level of serious variation from Development Plan policy parameters of the proposed redevelopment in its current form require careful consideration.

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

- Development comprises a small café at ground level to the front, and 25 apartments above, with limited diversity and no 'affordable' quantum;
- Building over-height - 8 storey and 28.5 metres versus policy of 7 storey and 25.5 metres, an extra 3.0 metres (12%);
- Building Envelope exceeded to north but intent of built form and access to sunlight reflected for proper and orderly interface between new development;
- 3m rear setback provided as required, with trees, providing a positive feature;
- 5.9 metres (versus 6 metres) ground level front setback, but building side wall projections and solid side enclosures to balconies above to seven stories within 4.9 metres encroaching into setback space;
- No side setbacks at ground level (versus required 3 metres to one side) with harsh facades to neighbouring site;
- Building foot-print at 82% exceeds desired policy of 70% given lack of setback;
- Vehicle parking shortfall of 3 spaces, or 8 spaces if sharing of ground level open parking between commercial and residential visitors is not supported by respective peak hours being complementary. Inadequate on-site parking will lead to significant impact upon on-street parking which currently cannot meet week day or weekend demand;
- High density development will compound the existing high traffic and on-street parking demand, but the width and nature of Rose Terrace maintains some capacity, providing future development incorporates proper distribution of consolidated access points and movements per Concept Plan Un/7;
- Waste service vehicle loading should desirably be forward entry and exit but the alternative to reverse into site for on-site servicing is workable;
- Provision of some vertical greening, deep soil of 69m² (7.3% - minimum required 7%) and two specimen trees to frontage and row of larger trees across rear boundary is supported, but further detail is required to ensure suitability and sustainability;
- Loss of existing Rose Terrace street tree in centre of frontage but an opportunity for 2 replacements of advanced trees either side and verge planting with reinstatement, in co-ordination with ground floor landscape;
- Overlooking not considerable issue given nature of zoning for area and expectations, and views to west over adjacent low-density residential properties are generally to public and access areas;

- Lack of any appropriate Stormwater Management with no on-site detention and retention to limit discharge to suitable maximum rate;
- Planning Consent conditions, in event approval were contemplated.

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

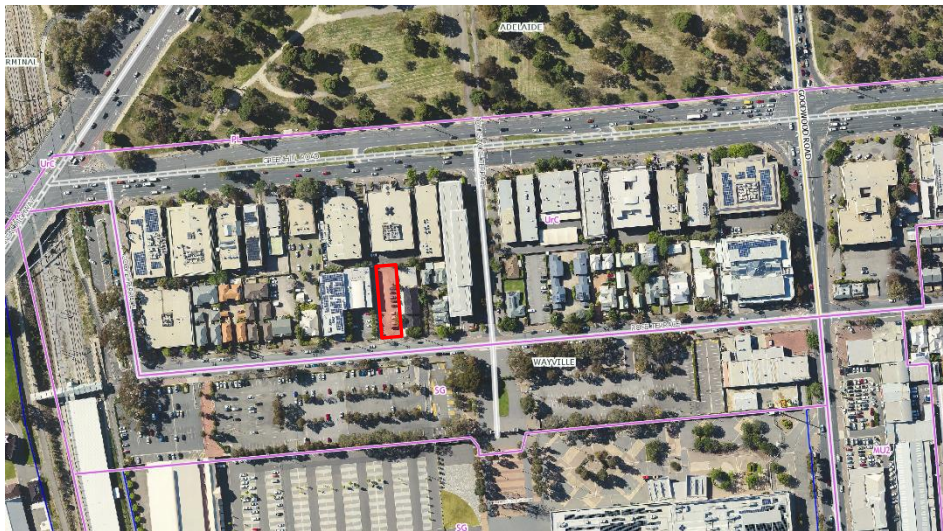
The full assessment of the development is the role of the Planning & Land Use Services (PLUS) officers and the ultimate planning approval judgement the role of the State Commission Assessment Panel (SCAP).

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:

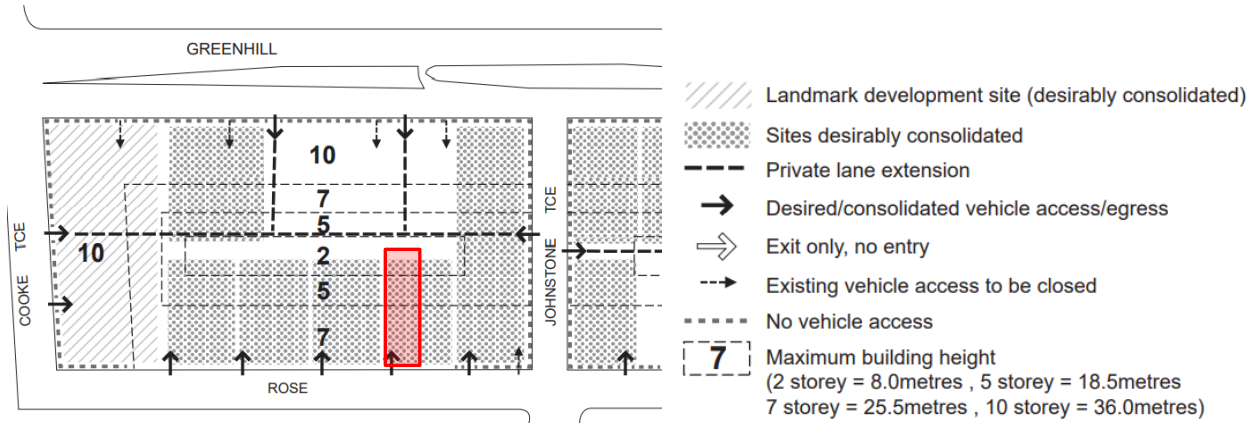
- Frontage to Rose Terrace, opposite Showgrounds, with site width of 18.29 metres and depth of 51.82 metres and an overall area of approximately 948m²;



- Development involves a mixed-use building comprising café of 84m² (60m² indoor and 24m² outdoor) and associated foyer and service rooms on ground level and 25 apartments above (18 x 2 bedroom, 6 x 3 bedroom and 1 x 4 bedroom). Limited diversity of dwelling sizes, but a net density of over 260 dwellings per hectare, well above desired minimum of 75 d/Ha;
- Development does not include the 15% of 'Affordable' dwellings;
- Height to eight (8) storeys (28.5 metres) versus policy of seven (7) storeys (25.5 metres). Represents a notable but not large variation over the total desired

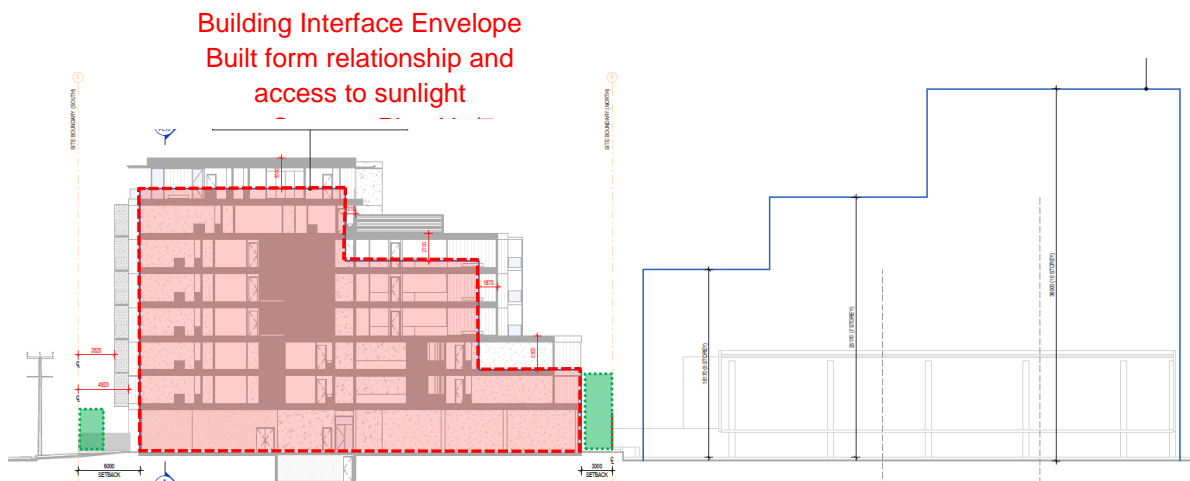
height by 3.0 metres (12%) and building has a recessed top level and lightweight roofing edge;

- The Building Interface Envelope is derived from Concept Plan Un/7 provides for proper and orderly development and appropriate urban design outcomes;



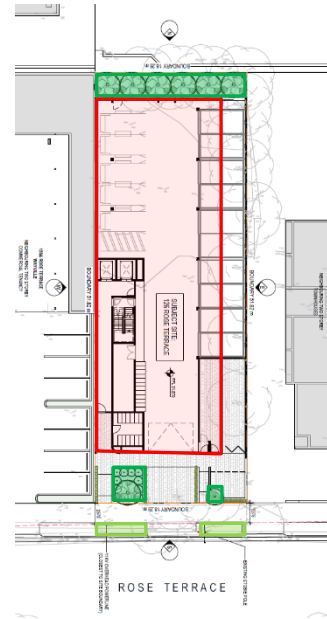
Concept Plan Un/7

- Unfortunately, with such an attempt at large-scale development of a small individual site an inherent tension arises that compromises the primary policy principles for a larger consolidated site, proper boundary setbacks, landscaped setting and overall better and more efficient development outcome;
- The Building Interface Envelope aims to afford an appropriate relationship and juxtaposition between the respective high-rise built-forms along Greenhill Road and Rose Terrace and a reasonable mutual access to sunlight;



- At the ground level Rose Terrace setback 5.9 metres (versus 6.0 metres) but space encroached in effect by extending building side walls and solid side enclosures to balconies above to seven storeys of 4.9 metres, noting open balconies extending to 3.5 metres, compromising front setback relief to street;

- At the ground level 0.0m setback to side boundaries does not address required 3.0m side street to one boundary, lacking relief to neighbour from long and plain building façade, and increasing building foot print to 82% compared to desired policy of 70%. Acknowledge setback provided above ground level, for residential amenity and building articulation;
- Rear boundary setback of 3.0 metres provided as required, and landscaped with row of larger trees which positively reinforces urban design built-form separation and landscaping of Concept Plan Un/7;
- Provision of deep soil of approximately 69m² (7.3% - minimum required 7%) with a medium and small specimen trees to the street frontage either side of central driveway and a row of larger trees across the rear boundary in building setback area;
- Loss of existing reasonable street tree located in centre of Rose Terrace frontage unfortunate, but an opportunity is available for 2 suitable advanced replacements either side of crossover, together with enhanced verge planting, as part of applicant/developer contribution to public realm reinstatement – this treatment should be co-ordinated with the development of the ground floor landscape to Rose Terrace;
- Vehicle parking shortfall of 3 spaces, or 8 spaces if sharing of ground level open parking between commercial and residential visitors is not supported by respective land use peak demands being complementary. Given the existing commercial land uses and proximity to train station and CBD, existing parking demand along Rose Terrace and adjacent streets is greater than available spaces. Pressure for parking is felt during commercial hours, and increasing after hours and over weekends, due to increased activities associated with the Show Grounds and adjacent Parklands sports. Council will shortly commence installation of pay-for-use parking and time limit parking within the area to manage existing demand. Inadequate on-site parking should not be accepted as it will place further demand on an already saturated resource.;
- Adequate bicycle provided, with space in a building storeroom for residents, and for visitors and commercial users in an area in the carpark;
- Storage areas for each of the residential apartments (min 8 m³) are not evident, which is a critical requirement for practical use by residents.
- Area is primarily for commercial land uses and mixed-use high-rise development with limited privacy requirements related to the juxtaposition and orientation between residential apartment buildings, windows and balconies. The proposed development residential dwellings outlooks are primarily north and south balconies with limited windows to east and west. Commercial developments exist to west and adjacent existing low density residential to east presents generally public and vehicle access areas largely mitigating private areas overlooking issues;
- 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-tops. Deep soil, trees, general landscaping, courtyard/balcony planting and green walls are lacking.

Overall, the proposal has several variations from fundamental policy parameters. Some are limited variations, individually of moderate significance, but together compound into considerable variation. The proposal is a new application to be determined on its own merit and the integrity of the policy, resolved after comprehensive urban design analysis and community debate, should be better observed.

Council Issues

Council specific comment is provided 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

There are no encroachments of the public realm.

Public Realm and Street Trees

There is a medium street tree near the centre of the frontage of Rose Terrace and a stobie pole to its east, which is unaffected.

The street tree appears in good condition but will conflict with the proposed central driveway. Removal of an established street tree is regrettable, and it is expected that advanced replacement tree stock would be required.

There is an opportunity with the central driveway to replace the current tree with two, one on each side. In addition, the verge area could be further enhanced by ground level landscaping to the mutual advantage of the street and proposed development appearance, green canopy and landscaping.

Council requirements, standards and costs for infrastructure work and street trees will need to be discussed, including the additional opportunities to collaborate and contribute to an enhanced public realm upgrade.

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

Onsite Landscape Treatments

The perspective views show a number of positive additions to greening the site, including ground floor landscape treatments to Rose Terrace, vertical green elements on the northern façade as well as a 3,0m wide landscape zone to the north of the site.

The landscape treatment to Rose Terrace should consider the adjacent verge and opportunities to maximise greening associated with the development. Noting the above comments regarding replacement street trees, further consideration could be given to the tree species selection and size, noting the limitation of the café tree specified.

Support is given to identify additional opportunities to expand vertical greening and green wall treatments onto the southern building façade, as well as opportunities for green roof layers. Council strongly supports green measures to assist building performance, general amenity and neighbourhood cooling.

Further detail is required to confirm suitability of vertical greening proposed on the northern façade, including support structure detail, plant species, planting conditions and irrigation provision, noting the potentially difficult microclimate and exposure.

Regarding the landscape zone to the northern boundary, further detail is required to confirm suitability of landscape treatments including tree species and initial stock size, under planting, planting conditions and irrigation provision, noting the potentially difficult microclimate. Council is concerned the species nominated may not achieve the desired height and effect.

Vehicle traffic, access, servicing and parking

Traffic and Access

Vehicle access is from Rose Terrace via a two-way crossover (approximately 6.0 metres wide), replacing the existing slightly narrower crossover to the west.

Rose Terrace is a two-way carriageway with on-street parking on both sides, which is in very high demand at most times and particularly during Showground events which are regular and frequent. Rose Terrace (section between Cooke Terrace to Hamilton Boulevard) currently carries approximately 1800 vehicles per day based on data collected in 2019. This data represents an average week day. Traffic volumes are much higher during events where motorists access Showgrounds off-street car parks opposite the development site. Pick-up and drop-off also occurs on Rose Terrace during events.

Access and egress to this section of Rose Terrace can be via Goodwood Road (left turn in, right turn in outside of 3-7pm Monday to Friday, and left turn out), or via Hamilton Boulevard (left turn in and left turn out) or Cooke Terrace (left turn in only) from Greenhill Road. As such, a reasonable proportion of the 1800 vehicles per day are likely circulating to access on-street parking, or u-turning on-street to enable them to exit the area from Hamilton Boulevard or Goodwood Road. This

suggests that in practice there are less vehicles using the street on an average weekday compared to a typical street carrying 1800 vehicles per day.

The development is considered high-density in terms of trip generation estimation. There is no guidance for daily trip generation rates for high density development that are applicable to a city-fringe site such as this. The NSW Government Roads and Maritime Services provides some values based on data collected in Sydney and regional NSW cities (values adopted in Cirqa report). This suggests daily trip rates of 1.52 trips per day for Sydney and 4.58 trips per day for regional cities. The rate applicable to this development is likely between these two values, and approximately 3-4 trips per day per unit. A café would generate approximately 60 trips per 100m² of floor area. This suggests that the development would generate an additional 111-136 trips per day.

The desirable maximum volume of traffic on a local street per the Unley adopted road hierarchy is 1500 vehicles per day. The additional estimated traffic would result in a total traffic volume in the range of 1900-1950 vehicles per day. However, as discussed this is likely not a true reflection of the number of individual vehicles using the street. In addition to this, as egress from the area is only via left turns out on to Goodwood Road or Greenhill Road, it is unlikely that this increase in traffic volume would impact traffic queues at intersections (which are often the result of right turns out). Further it is acknowledged the nature and land use around Rose Terrace does not reflect a typical residential street and affords some greater capacity.

As a location of high traffic and on-street parking demand it will be compounded by high density development, but the width and nature of Rose Terrace maintains some capacity, providing future development incorporates proper distribution and consolidated access points and movements per Concept Plan Un/7.

Generally, the car park complies with AS2890.1. The eastern wall adjacent the driveway where it meets the footpath must be equal or less than 1m in height, or alternatively set back from the property boundary to ensure adequate sight distance to pedestrians (refer Figure 3.3 AS2890.1).

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. Although some unrestricted on-street parking is available, this is often occupied very early in the day. Alternative parking options for tradespeople should be considered as part of the Construction Management Plan.

Vehicle Parking

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

Table Un/5 standards for residential and Table Un/5A for commercial in higher density mixed-use develop development are applicable. The parking standards are

already discounted for mixed-use, proximity to public transport and availability of on-street parking. Expectations for additional discounting are unwarranted.

Based on the provisions the car parking analysis and requirements is as follows:

Land Use	Scale	Rate	Required	Provided
Shop	60m ²	Min 3 / 100m ² gla	1.8	5 ⁺
Outdoor Dining	24m ²	Min 3 / 100m ² gla	0.72	
Total - ground level			2.5*	5 ⁺
Total			2.5*	5 ⁺
Apartments				
1 bed or < 75m²	0	0.75	-	
2 bed or > 75m²	18	1.25	22.5	
3 bed or > 150m²	6	1.75	10.5	
4 bed or > 150m²	1	1.75	1.75	
Total – ground level	25		34.75	29 [#]
Visitor – ground level	25		5	5 ⁺
Total – shared visitor			37.25	34
Total - exclusive			42.25	34
Shortfall Shared				3
Shortfall Total				8

- + Including disabled space – shared and used out of commercial hours for residents’ visitors
- # Total number vehicles provided for within 10 spaces
- * 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 presents a shortfall of 3 spaces from the 34 spaces provided on-site, if sharing of ground level parking for residential visitors with complementary peak demands if commercial activity times are limited. Otherwise there is a shortfall of 8 spaces where peak times are not complementary, eg operating after hours and weekend periods versus resident visitors demand periods, and each land use requires their own available parking. Desirably scale of development needs to be reduced and number of spaces increased.

Car park designation should be included to ensure the 5 open spaces are made mutually available to commercial tenants and residential visitors.

There is currently very high demand for on-street parking, mainly from adjacent business premises and visitors. On-street parking is generally time managed, 2 hours 9am to 5pm Monday to Friday with some limited unrestricted parking on south side. Unrestricted parking will be further reduced in the coming months with introduction of paid parking and additional time limit zones as part of a local area plan to better manage parking demand.

During many and major events at the Showgrounds, which are regular and frequent and particularly the annual show, special additional temporary controls and restrictions are applied across the area to ensure safe traffic movement. The level of on-site parking is therefore critical to not exacerbate the existing situation and to ensure a practical operation of the subject development.

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
Shop	84m ²			
Employee (ground level)		1/150m ² gla	1	2
Visitor (ground level)		1/600m ² gla	1	5
Residential	25			
Resident (ground level)		1 / 2 dwellings	12.5	12
Visitor (ground level)		1 / 6 dwellings	4.16	5
Total			19	24
Employee / Resident			13.5	14
Visitor			5	10

There is good provision for bicycle parking, with 24 spaces versus 19 required.

Resident enclosed bike store at south west corner of ground floor provides accommodation for 12 bicycle spaces.

An area indicated as 7m², and 12 spaces, is provided within carpark area opposite the café alongside west side of ground level central driveway, for commercial users and resident visitors. Access to driveway and spaces within site will need to be ensured during commercial and visitor hours and access arrangements in place for resident visitors after hours, with suitable management of driveway security door.

The safety for cyclists traversing the vehicle driveway and carpark area amongst moving vehicles is a concern. Also parking in a confined carpark area creates security issues for cyclists, and pedestrians. Critically safety for riders and pedestrians should be better addressed by clear signage, line-marking, lighting, escape routes.

Waste Servicing

A comprehensive Waste Management Plan addresses the capacity, separated streams and servicing for waste generation. The provision for waste bins addresses the respective uses, eg shop/cafe and residential, but the waste storage room appears short of 1 co-mingled recycling 660L bin. It needs to be assured provision is adequate to future proof adequate and appropriate ongoing service.

Routine collection is anticipated for 3 each for residential and commercial services or 6 individual truck movements per week of larger and multiple bins. It is suggested these may be collected at the same time, but this would require a

coordinated service, and while reducing to 3 visits per week they would each be for longer. Particular adhoc requirements for additional specific pick-ups, eg e-waste and hard waste, will occur on an as needs basis.

Collection times have not been nominated, other-than for typical EPA requirements and to be outside peak periods. Specific nominated collections would be advisable, between 10:00 am to 3:00pm Monday to Saturday, to minimise impacts during peak traffic periods and on residential amenity.

Waste management servicing arrangements appear adequate with waste vehicles to enter the site off Rose Terrace to access internal bin store area. The large waste vehicles will need to stop in Rose Terrace and reverse into the site, which is not ideal and exit in a forward direction. Vehicle forward entry and exit is normally required but with a constrained site and in the circumstances the compromise solution is workable. With such large-scale development of small sites an inherent tension arises to the normal desired effective functionality.

Stormwater Management

The existing development has a high (possibly 100%) impervious area being a gravel surfaced carpark.

The maximum runoff flow rate for commercial development should be less than pre-existing and the equivalent of 80% impervious (20% pervious) whichever is the lesser in accord with Development Plan (Unley) and City of Unley *Development and Stormwater Management Design Guide*.

On-site stormwater management is not addressed. Provision should be made for adequate on-site storage for detention, retention and quality management to address on-site WSUD and address required maximum peak stormwater outflows.

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 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 and 99^{tho}% vehicle turning paths;
- Car parking on-site be allocated to ensure:
 - a minimum of 5 spaces at ground level are provided for unrestricted use by commercial tenants, commercial visitors and residential visitors;

- unrestricted access to the ground level parking be available during day time, 7:00am to 10:00pm any day, and secure access arrangements made for residential visitors after hours;
- 29 available car stackers be allocated to ensure a minimum of 1 space per dwelling;
- Bicycle parking on-site be allocated to ensure:
 - the enclosed bike store for 12 spaces are for residents use;
 - the 12 open spaces in ground level carpark off the driveway be made available for unrestricted use by commercial tenants, commercial visitors and residential visitors;
 - the 12 open spaces in ground level carpark off the driveway and dedicated bicycle/pedestrian access routes be clearly signed and line-marked to ensure safe movement on-site and emergency alternative egress(s);
- Non-residential land uses not operate outside the hours of 7.00am to 4.00pm to facilitate complementary sharing of on-site visitor parking for residential use;
- Waste and servicing vehicles be a maximum length of 8.8 metres and reverse into the site from Rose Terrace, 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 3:00pm Monday to Saturday, excluding Sundays and public holidays, to avoid peak traffic periods and respite days;
- 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-way accessway be clearly divided or line-marked to avoid vehicles not staying in their path and blocking opposite movement and interrupting on-street movement;
- Public realm configuration, damage, reinstatement and enhancement in relation to footpaths, verge planting and street trees 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;
 - roofwater detention and retention tanks be sensitively incorporated into plans without compromising other required functions or overall design;
 - 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 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 (including alternative provision), operating hours, noise, pedestrian and amenity issues;
- It is requested a Note be added indicating pursuant to the City of Unley *On-street Parking Exemption* Policy permits are not issued for occupants of new development (post 2013).

Conclusion

The development proposal is of great interest to Unley residents and businesses, particularly those near 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, apart from the intensive development of a small individual site rather a larger consolidated site to avoid fundamental compromises. 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



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

29 March 2021

Date

SPC REFERRAL - COUNCIL

Our Ref: 2021/02035/01

15 February 2021



Level 5, 50 Flinders Street
Adelaide SA 5000

GPO Box 1815
Adelaide SA 5001

Telephone: 1800 752 664
Email: saplanningcommission@sa.gov.au
ABN 92 366 288 135

Applicant: J & K Empire Pty Ltd C/- PBA
Application Number: 090/M023/21
Proposed Development: Construction of an eight (8) storey mixed-use building comprising residential apartments, cafe, ancillary car parking, landscaping, and associated building work
Subject Land: 126 Rose Terrace, Wayville

Dear Sir/Madam

The State Planning Commission (SPC) has recently received a copy of the proposed development application described above (Note: all relevant documentation is attached).

Pursuant to Section 33(1) of the *Development Act 1993* and Regulation 38(2) of the *Development Regulations 2008* a copy of the application is attached for your review and comment.

Council's attention is particularly drawn to the time allowed for comments under Regulation 38(2):

A period of six (6) weeks from the date of lodgement (where Council has received the application) is provided to enable comments to be prepared and forwarded to the SPC. *Note: If the application is a type of development lodged directly with the SPC pursuant to Regulation 15(3), the six-week period for comment starts from when a copy of the application is received by Council from SPC.*

On request, the SPC may grant an extension to the indicated timeframe, however this request should be made in advance of the due date to the relevant planning officer (or to the SPC Secretary on 7109 7060) indicating the reasons for the request and the period of extension sought.

If you have any questions relating to this matter, please contact Karl Woehle of this office by telephone on 7109 7169 or email karl.woehle@sa.gov.au

When replying please attach a copy of this letter with your details below.

Yours faithfully,

STATE PLANNING COMMISSION