

23 February 2021

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

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

Dear Commission

**INFORMAL REFERRAL COMMENTS – DA 090/M021/20  
70 GREENHILL ROAD WAYVILLE**

Thank you for the informal referral received on the 12 January 2021 of the above-mentioned application lodged with the State Commission Assessment Panel, and invitation for comment within 6 weeks (23 February 2021) to assist the assessment process.

The nature of development encompasses:

*Construction of a multi-storey, mixed use building comprising residential and commercial uses together with carparking and site works.*

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 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, corridor and place.

It is disappointing there was no preliminary discussion prior to lodgement and that the proposal lacks due regard for critical policy. A range of substantial variations are unwarranted relative to the specific local circumstances and 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, suggesting a serious variation from fundamental 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 - 8 storey versus 7 storey and extra 2.9 metres (11%);
- Building Interface Envelope significantly exceed to south compromising proper and orderly zone interface;
- Plant and services not shown on roof or building, nor its integrated screening;
- 6m front setback, but encroaching full height columns and balconies;
- No side setbacks at ground level (versus required 3m to side street) with harsh facade to street;
- Building extent and scale compounds over-developed and excessive building footprint and building mass of 86% versus desired 75%;
- Lack of architectural definition to laneway interface, managing dual driveway entry points (ground floor and basement access) and sightlines for pedestrian and vehicle movement surrounding the proposed transformer,
- The recessed lobby lack legibility from the street and the recessed undercover area may pose CEPTED issues
- Vehicle parking shortfall of 23 spaces, or 15 spaces if sharing of ground level commercial parking for resident visitors where respective peak hours are made complementary. Inadequate on-site parking will lead to significant impact upon on-street parking currently under very high demand;
- Compounding traffic implications upon already excessive local volumes in Greenhill Lane and Clark Street due to lack of proper distribution of consolidated access points and movements per Concept Plan Un/6;
- Waste service vehicle loading should be from on-site, ie reverse into site off lane, within limited hours that avoid compounding peak traffic periods and shortage of on-street parking;
- No deep soil (minimum required 7% = 78m<sup>2</sup>) nor provision of any trees, contrary to fundamental policy and reinforcing evidence of over-development;
- Lack of detail and provision for landscaping, including trees and appropriate planters on concrete ground surface;
- Greenhill Road and Clark Street public realm implications, including impact on street trees (or suitable replacement) and footpath and verge treatment;

- Overlooking not mitigated at all to reasonably minimise open viewing to south east and south west and over adjacent low-density residential properties;
- 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).

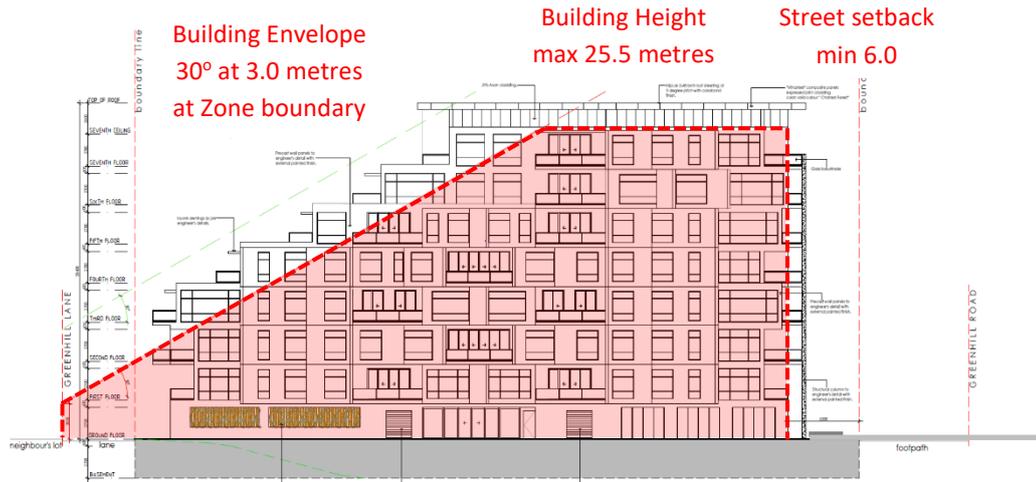
It is appreciated Council's role is limited to comments on designated matters and observations in relation to planning assessment matters from a local perspective to highlight key issues that require further analysis / assessment by PLUS officers and SCAP.

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

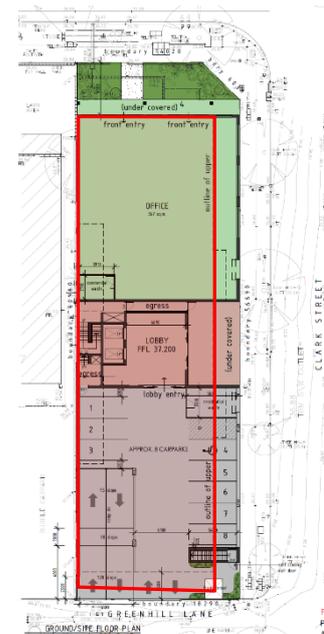
In brief, the proposed development encompasses the following key features and planning concerns:

- Site frontage to Greenhill Road of 14.02 and to Clark Street 56.69 metres plus a 4.27 x 4.27 corner cut-off, overall width of 18.29, overall depth of 60.96 metres and an overall area of approximately 1,105m<sup>2</sup>;
- Development involves an 8-storey mixed use building comprising 367m<sup>2</sup> of commercial / office space on ground level and 30 apartments above (5 x 1 bedroom, 10 x 2 bedroom and 15 x 3 bedroom). In addition to good diversity of dwelling sizes and active ground level frontages, a net density of over 270 dwellings per hectare is achieved, well above desired minimum of 75 d/Ha;
- Height to eight (8) storeys (25.8 to 28.4 metres - roof services not shown) versus policy of seven (7) storeys (25.5 metres). Represents a notable but not in itself large variation over the total desired height by 0.3 to 2.9 metres (11%);

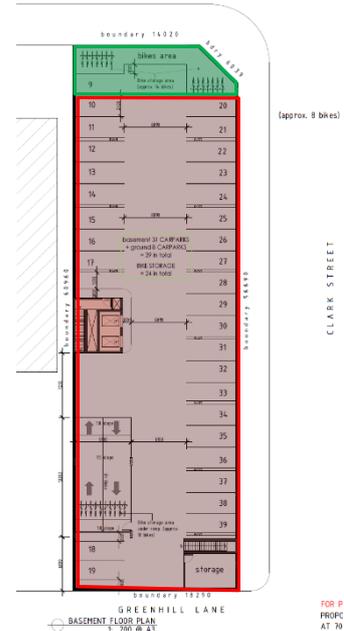




- The Building Interface Envelope (30 degrees at 3m) is applicable from the zone boundary to limit overbearing building mass, overshadowing and provide a proper and orderly demarcation for diverse development. The existence of an atypical non-residential use to the rear does not change the long-term zoning and intended future development nature nor the existence of low-density residential dwellings in proximity to the east and west;
- At the ground level 6.0 metre Greenhill Road setback provided but space encroached in effect by full height solid columns and projecting balconies;
- Rear lane setback of 6.5 metres from opposite side, and therefore 0.4 metres from boundary, provided for;



- At the ground level Clark Street 0.0m setback does not address required 3.0m side street setback, providing no relief to street from long, harsh and plain building façade and excessive building foot print of 86% compared to conforming one of 75%. Acknowledge setback provided above ground level, for residential amenity and building articulation;



- The full site is excavated to the extent of the boundaries ignoring required 7% (78m<sup>2</sup>) for deep soil, that should be provided to realise complementary trees at least to the Greenhill Road frontage area and desirably Clark Street and rear laneway;
- Further, any intimated green landscaping areas would be directly upon ground level concrete slab, with no detail provided of how effective planting would be achieved, noting the requirements are similar to a roof top garden;
- Similarly, the planting shown at the southern end of the development surrounding the proposed transformer would have specific design requirements to accommodate for low natural-light due to orientation and shadowing
- Excavation will also pose impacts to the root zones of the existing street trees. Further detail is required regarding efforts to protect existing trees or proposals for the likely replacement, noting compromised ground and overhead space for suitable scale of trees;
- On-site parking should be adequate to meet demand, guided by appropriate standards. Applicable standards indicate 54 (53.75) spaces are required. A shortfall of 23 spaces from the 39 spaces (8 at ground level and 31 in basement) provided on-site, or 15 spaces if sharing of ground level commercial parking for resident visitors where respective peak hours are made complementary. Scale of development needs to be reduced and number of spaces increased;
- Parking for 24 bicycles is provided in the underground basement level. Standards indicate 25.5 is required, 17.45 occupants and 8 for visitors. No provision for bicycles is evident at the ground level to service the respective visitor requirements, which could also increase overall provision.
- Storage areas for the residential apartments (min 8 m<sup>3</sup>) are not evident, which is a critical requirement for practical use by residents.
- Open overlooking without any consideration to mitigation to adjacent low density residential private areas, to the south, south-west and south-east, ie by orientation of outlooks, focus on long views, recessed viewing points, screening (eg obscure glass) to balconies and windows; The general *Residential Development* policy regarding a 30 metre separation does not address consideration of the general policy in *Design and Appearance, Interface Between Land Uses, Medium and High Rise Development (3 or More Storeys)* and *Urban Corridor Zone* policy where additional general policy indicates “...minimise direct overlooking of the habitable rooms and private open spaces of dwellings...” “Development adjacent to a Residential Zone should be designed to minimise overlooking and

*overshadowing of adjacent dwellings and private open space...” “Balconies ... should ... allow views ... while providing for ... visual privacy of nearby living spaces and private outdoor areas...” “...Overlooking ... impacts will be moderated through good design and mitigation techniques ...” “... Impacts on adjoining zones will be minimised through appropriate ... design and location of on-site activities/windows/balconies ...”*

- 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 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 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**

No encroachments of the public realm are evident.

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

There are two small, and two larger mature, street trees on the frontage of Clark Street and a small and larger mature street trees to Greenhill Road frontage. They are in fair condition, albeit some of poor form and damaged, but are generally beneficial and provide amenity and green canopy.

The excavation to the boundary encroaches into the root zone and is likely to negatively impact upon their reasonable retention. Their removal would be unfortunate, but replacement could deliver a new coordinated public realm.

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

The lack of any landscaping, and deep soil, on the site compounds the critical need to maintain a high level of street trees and green public realm.

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

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

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

#### Traffic and Access

Vehicle access is entirely from Greenhill Lane (6.1 metres wide) and via two two-way crossovers (comprising 12.2 of 18.1 metres frontage). This replaces the existing single two-way crossover to Greenhill Lane.

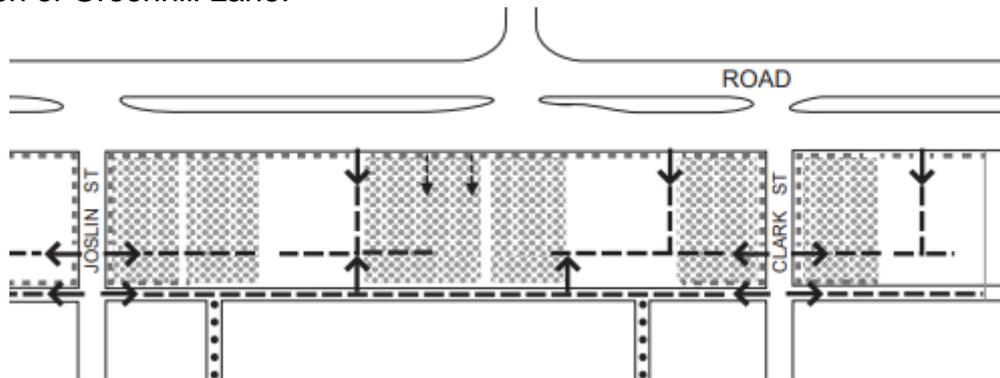
Greenhill Lane is a two-way lane currently providing access to 10 car parks on the northern side, only one of which has a dual access from Greenhill Road. It also provides rear access to residential properties on the southern side. Traffic counts undertaken in 2018 indicate that Greenhill Lane carries approximately 450 vehicles per day. However, as this data is generally collected approximately half way between Joslin Street and Clark Street, it does not capture traffic entering and exiting from the same street (for example, entering from Clark Street and accessing a car park to properties 64-70 Greenhill Road, and exiting to Clark Street). This suggests that the traffic volume is likely significantly higher.

Clark Street currently carries up to 2500 vehicle per day in the section from Rose Terrace to Greenhill Road, which exceeds the desirable maximum of 1500 vehicles per day on a residential street. Recent data collection at the Clark Street/Greenhill Road intersection indicates that traffic regularly queues back to Greenhill Lane during peak times and as far as Rose Terrace. This traffic volume is high as Clark Street and Joslin Street are the only accesses on to Greenhill Road between King William Road and Goodwood Road from Wayville, with the only other efficient way to travel north requiring a right turn on Goodwood Road.

Estimated traffic generation rates in Department of Infrastructure and Transport (DIT) '*Trip generation rates for assessment of development proposals (2014)*' indicates that the development would generate 220 vehicle trips per day and 23 in the peak hour (assuming medium density and larger dwellings, which is appropriate considering the high proportion of 3-bedroom apartments). This would be significantly higher if the ground floor tenancy were a shop like a supermarket, eg an IGA, instead of an office, as mentioned in the planning report. This would result in a theoretical total trip generation of 648 vehicles per day and 65 during the peak hour for the development. However, this would be unlikely fully realised as parking supply would limit the number of potential customers.

The lack of a larger site (encouraged amalgamation) and distribution of consolidated access points and distributed movements to Greenhill Road per Concept Plan Un/6 compromises envisaged, proper and orderly long-term development outcomes and traffic management. All traffic (anticipated 220 vehicles per day) to Greenhill Lane will compound existing load, and with further such

envisaged development, will inevitably lead to excessive pressure, conflict and dis-function of Greenhill Lane.



Concept Plan Map Un/6

Given limited access and egress points from the suburb, significant existing commercial development and large school on Rose Terrace there is considerable demands on peak traffic flows and on-street parking. Careful and forward-focused appropriate distribution and management of access and traffic movement for anticipated new major development is required. This could include a ground floor site layout that provides for future car park amalgamation with neighbouring properties and alternative consolidated access other-than solely Greenhill Lane, which need not compromise functionality in the short term.

The two-way access to Greenhill Lane is indicated to be 6.1 metres (inclusive of 0.3 metre clearances which is minimal) and would likely leading to potential conflict between entry and exit movements, traffic queuing and interrupting on-street movement. The accessways should be clearly divided and line-marked to avoid this.

Access, car parking and manoeuvring within the car park are tight, premised on 85<sup>th</sup> percentile size vehicles rather than more practical 99<sup>th</sup> percentile, that lead to counter flows and movement conflicts in aisles, driveways and potentially for vehicles entering the site. AS2890.1 indicates that intersections between circulation roadways, ramps and aisles shall be designed for an 85<sup>th</sup> percentile and 99<sup>th</sup> percentile vehicle to pass one-another, which is unlikely to be achievable with the current design. In addition to this, although not mandatory in a private car park, a turnaround area at the northern end of the basement car park would improve functionality of the car park and provide greater flexibility for future public use.

The electricity transformer is noted as a potential interference to sight lines from Greenhill Lane to Clark Street with a mirror as a suggested solution. New development should avoid inherent design failings. The suitable (re)location of the transformer should be incorporated into the design to ensure appropriate sight lines are provided for in the new design.

Clark Street provides important pedestrian and cycle connections into the CBD, with a separated crossing established at Greenhill Road. The corner treatment of Clark Street / Greenhill Lane must consider these increasing accessibility requirements and ensure improved sightlines.

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 proximity to the CBD and existing businesses along Greenhill 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 for alternate parking provision for trades associated with the construction.

### Vehicle Parking

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

The site location and lack of comparable surrounding services and facilities do not relate to a District Activity Centre.

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 and availability of on-street parking. Expectations for additional discounting based on the reasons already accounted for are unwarranted.

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>Shop/Office/Consult</b>	367m <sup>2</sup> ?	Min 3 / 100m <sup>2</sup> gla	11.25	11 <sup>+</sup>
<b>Outdoor Dine</b>	?m <sup>2</sup>	Min 3 / 100m <sup>2</sup> gla	?	
<b>Ground level</b>			8	8 <sup>+</sup>
<b>Basement</b>			3	3
<b>Total</b>			11.25 <sup>*</sup>	11 <sup>+</sup>
<b>Apartments</b>				
<b>1 bed or &lt; 75m<sup>2</sup></b>	5	0.75	3.75	
<b>2 bed or &gt; 75m<sup>2</sup></b>	10	1.25	12.5	
<b>3 bed or &gt; 150m<sup>2</sup></b>	15	1.75	26.25	
<b>Visitor – ground level</b>	30		7.25 <sup>+</sup>	8 <sup>+</sup>
<b>Basement</b>			42.5	28
<b>Total</b>			53.75	39
<b>Shortfall Shared</b>				<b>15<sup>+</sup></b>
<b>Shortfall Total</b>				<b>23</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 presents a shortfall of 15 spaces from the 39 spaces (8 at ground level and 31 in basement) provided on-site, if sharing of ground level parking for residential visitors (7.5 residential visitors spaces = 30 dwellings at 0.25) where respective land uses are complementary and have contrary peak times. Otherwise there is a shortfall of 23 spaces where peak times are not complementary, eg shop (supermarket, café etc) operating after hours and weekends. Scale of development needs to be reduced and number of spaces increased.

Based upon Table Un/5 for residential development 42.5 spaces are indicated (3.75 for 5 x 1 bed, 12.5 for 10 x 2 bed and 26.25 for 15 x 3 bed) plus 11.25 for commercial office.

Car park designation and allocation should be reviewed, to ensure 3 spaces are allocated in the basement for commercial tenants in addition to the 8 spaces at ground level being freely available for commercial activity and resident visitors.

There is currently very high demand for on-street parking, mainly from adjacent business premises staff and visitors. Time managed parking, 2 and 4 hrs, is widespread to ensure turn-over but this does not address the inherent shortage. 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
<b>Shop/Office/Consult</b>	367m <sup>2</sup> ?			
<b>Employee (basement)</b>		1/150m <sup>2</sup> gla	3	3+
<b>Visitor (ground level)</b>		2 + 1/500m <sup>2</sup> gla	3	0?
<b>Residential</b>	30			
<b>Resident (basement)</b>		1 / 2 dwellings	15	21+
<b>Visitor (ground level)</b>		1 / 6 dwellings	5	0?
<b>Total</b>			26	24
<b>Employee / Resident</b>			18	24
<b>Visitor</b>			8	0?

Reasonable bicycle parking may be provided, but is marginally short with 24 versus 26 required, albeit ground level visitor parking is not indicated.

Additional provision is possible at ground level, and the 8 required public visitors could be included, to address shortfall and respective visitor requirements - 4 should be provided to the front of the site adjacent to commercial entry and 4 to side adjacent residential entry.

Dedicated racks for employees and resident occupants within the basement carpark should be allocated and designated to meet the respective needs. Further, safety for cyclists traversing the vehicle driveways and carpark area amongst moving vehicles should be better addressed. Also parking in confined ends of the basement create security issues for users where security for bicycles and critically people should be addressed.

### Waste Servicing

A comprehensive Waste Management Plan appears to address the adequate capacity, separated streams and servicing for waste generation. The provision for waste and bins should address the highest order use, eg retail, to future proof adequate and appropriate ongoing service.

Routine collection is anticipated for 3 residential services and 4 commercial services weekly of larger and in some cases multiple bins. It is suggested these may be collected at the same time, but this would require a coordinated service, when separate services may arise increasing visits to 7 per week. Particular adhoc requirements for additional specific pick-ups and hard waste will occur on a needs basis.

Collection times have not been nominated, other-than for typical EPA and council requirements of 7am to 7pm Monday to Saturday and 9am to 7pm Sunday and public holidays. This may be reasonable for on-site service, but not for on-street. In any event very specific nominated collections would be preferable, between 10:00 am to 3:00pm, to minimise impacts to residents and peak traffic periods, including the adjacent school. Avoiding Sunday servicing would be preferable.

Waste management arrangements appear adequate, but waste vehicle servicing is proposed to occur from Clark Street, and from a necessary dedicated loading zone. 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.

Unfortunately, with such large-scale development of small sites an inherent tension arises to achieve effective functionality.

While not ideal, a preferable arrangement would be for modest service vehicles (max length 8.8 metres) to enter from, and exit to, Clark Street in a forward direction from Greenhill Lane, and reverse into the site from the lane, ensuring the most effective turn path geometry and least impacts, to afford servicing from on-site.

### ***Stormwater Management***

The existing development has a limited pervious and high impervious area, but the proposed development has a 100% impervious area.

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 required 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<sup>th</sup>% ;
- Car parking on-site be allocated to ensure:
  - at ground level a minimum of 18 spaces are provided (additional 7 spaces or commercial floor space and dwellings be commensurately reduced);
  - no restricted access to ground level during operating times for commercial activities and residential visitors;
  - a minimum of 3 spaces be allocated in the secure basement parking area for use by staff of the commercial tenancies;
- Bicycle parking on-site be allocated to ensure:
  - at ground level a minimum of 8 spaces are provided (3 for commercial visitors and 5 for resident visitors);
  - at basement level the available spaces are designated for minimum allocation of 3 to commercial tenants and 18 for resident occupants;
- Non-residential land uses not operate outside the hours of 7.00am to 7.00pm Monday to Friday to ensure complementary sharing of parking for residential visitors;
- Café/restaurant not operate outside the hours of 9.00am Sunday and 7.00am Monday to Thursday to 10.00pm and 7.00am to 11.00pm Friday and Saturday;
- Waste and servicing vehicles be a maximum length of 8.8 metres and enter from, and exit to, Clark Street in a forward direction from Greenhill Lane to ensure 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 two-way rear accessways be clearly divided or line-marked to avoid vehicles not staying in their path and 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;
- A detailed stormwater management plan with accompanying calculations shall be submitted which demonstrates the retention/detention volumes to ensure the flow rates discharging from the development are less than or equal to the lesser of pre-existing development or 80% impervious site coverage, and include:
  - stormwater from non-permeable surfaces (eg roofs, courtyards and carparks) collection on-site, treatment, detention and optimised onsite reuse for grey water, eg toilets and landscaping irrigation;
  - rainwater detention and retention tanks be sensitively incorporated into plans without compromising other required functions or overall design with scale, location and screening of screen
  - Street outlets to the street be limited to 4 litres per second each and 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 (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, 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. However, the highlighted areas of concern with planning design and council infrastructure matters should be addressed as part of the expected comprehensive assessment by SCAP.

**Enquiries**

If there are any queries or need for further explanation or information please contact David Brown, Principal Policy Planner, [dbrown@unley.sa.gov.au](mailto:dbrown@unley.sa.gov.au) or 8372 5185.

Yours sincerely

A handwritten signature in black ink, appearing to be 'PTs', followed by a long horizontal line extending to the right.

**Peter Tsokas**  
**CHIEF EXECUTIVE OFFICER**

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

Dear Sir,

I advise that this Agency has **the attached ~~no~~ report** to make on the proposed development described below.

David Brown  
Principal Policy Planner

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Reporting Officer

23 February 2021

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Date

**INFORMAL REFERRAL**



Level 5, 50 Flinders Street  
Adelaide SA 5000

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Adelaide SA 5001

Telephone: 08 7109 7060  
ABN 92 366 288 135

<http://www.saplanningcommission.sa.gov.au/scap>

Our Ref: 2020/21416/01

12 January 2021

**Council:** City of Unley  
**Application Number:** 090/M021/20  
**Proposed Development:** Construction of a multi-storey, mixed-use building comprising residential and commercial uses together with car parking and site works.  
**Subject Land:** 70 Greenhill Road, Wayville  
**Relevant Authority:** State Planning Commission  
**Planner:** Elysse Kuhar

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

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

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

If you have any questions relating to this matter, please contact Elysse Kuhar of this office by telephone on 7109 7072 or email [elysse.kuhar@sa.gov.au](mailto:elysse.kuhar@sa.gov.au).

Yours faithfully,

For **STATE PLANNING COMMISSION**