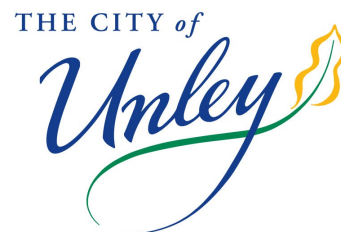


14 April 2023



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

Attention: Lauren Talbot lauren.talbot@sa.gov.au

**SCAP REFERRAL – Regulation 23 (2) (b) - COUNCIL COMMENTS
DA 22043006 – 163a-164 Greenhill Road Parkside**

Thank you for referral of the above-mentioned application on 24 March 2023 (following initial referral on 24 January recalled on 3 February for more information) for technical comment by the 14 April 2023. Council appreciates the opportunity to provide comment to assist the planning assessment process by the State Commission Assessment Panel (SCAP).

The nature of development encompasses:

Mixed use (commercial and residential) development comprising eleven (11) levels (western building) and nine (9) levels (eastern building), as well as adaptive reuse and extension of an existing Local Heritage Place, accommodating a commercial tenancy, 233 residential apartments together with associated shared amenities, swimming pool, carparking and landscaping

Council seeks to provide comment on designated Council matters in accord with Planning, Development and Infrastructure Regulations 23 (3), and any observations on key local planning matters that are considered to require further analysis and assessment, to assist SCAP appreciate the implications upon the orderly and proper planning of the local area and the implications upon local infrastructure and the public realm.

Regulation 23 (2) (b) affords an opportunity for a report on behalf of the council by the Chief Executive Officer in accord with sub-regulation (3) *within 15 business days after the request is received* – 20 January therefore 10 February 2023.

CITY of VILLAGES

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Regulation 23 (3) provides that *the following matters are specified for the purposes of a report under sub-regulation (2)(b)*:

- (a) *the impact of the proposed development on the following at the local level:*
 - (i) *essential infrastructure;*
 - (ii) *traffic;*
 - (iii) *waste management;*
 - (iv) *stormwater;*
 - (v) *public open space;*
 - (vi) *other public assets and infrastructure;*
- (b) *the impact of the proposed development on any local heritage place;*
- (c) *any other matter determined by the Commission and specified by the Commission for the purposes of sub-regulation (2)(b). (None specified).*

Council has delegated to the Chief Executive Officer, or his nominee(s), the authority to negotiate appropriate outcomes regarding street trees, crossovers, verge and future public realm upgrades, 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 but observations in relation to planning assessment matters with implications from a local perspective are appropriate to highlight key issues that require further analysis and assessment by PLUS officers and SCAP.

Planning Policy Observations

In general terms the proposal reflects the broad intent of the Urban Corridor (Boulevard) Zone for high rise in a landscaped setting but encompasses some notable variations from applicable design policy.

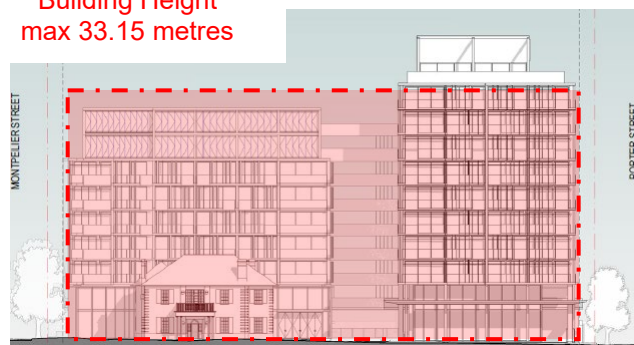
The Planning and Design Code policy transition from the Development Plan compromised the intended desired urban design outcome for the corridor regarding building height, building interface envelope, narrow sites, side setbacks, side street setback and balcony encroachments into primary street setbacks. While the new policy is appreciated, and has to be accepted, its desired outcome and policy intent should be properly observed, and variations from policy limited.

In brief, the following planning observations are made in relation to the proposed development notable features and variations from policy:

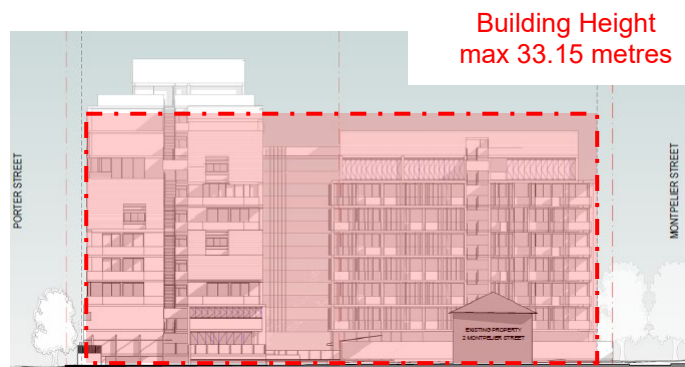
- Site is large with a primary frontage to Greenhill Road of 71.1 metres, and side frontages to Montpelier Street of 59.1 metres and Porter Street 89.6 metres (albeit this encompasses the house at No 3 and an additional 15 metres beyond the current office site and zone boundary), and an overall area of 5,310 square metres;
- Development is intensive with approx. 1,200 square metres of commercial floor space and 232 'build to rent' small dwellings, comprising primarily 190 1 bedroom, 26 studio, 16 2 bed and no 3+ beds. A very high net density of 437 dwellings per hectare, well above the minimum of 75 dwellings per hectare;
- The substantive zone policy allows seven (7) levels and 25.5 metres, but as a Significant Development Site (over 25 metres frontage and 2,500 square metres in area) together with incorporation of a Local Heritage Place and affordable housing, or multiple other positive design features, a bonus of up to 30% in height is afforded allowing for nine (9.1) levels and 33.15 metres in height;
- Eastern tower building indicated to be 30.3 metres (30.0 plus 0.3 above ground level) to main height, 31.9 metres to plant room, and shaped to be within Building Interface Envelope (30⁰ at 3.0m agl) to zone boundary;
- Western tower building indicated to be 35.1 metres (34.8 plus 0.3 above ground level) to front facade and terrace fence (extra 1.65 metres or 5%) but up to 39.9 metres to terrace roof top (extra 6.75 metres or 20%) over an already arbitrary 30% bonus increased height;



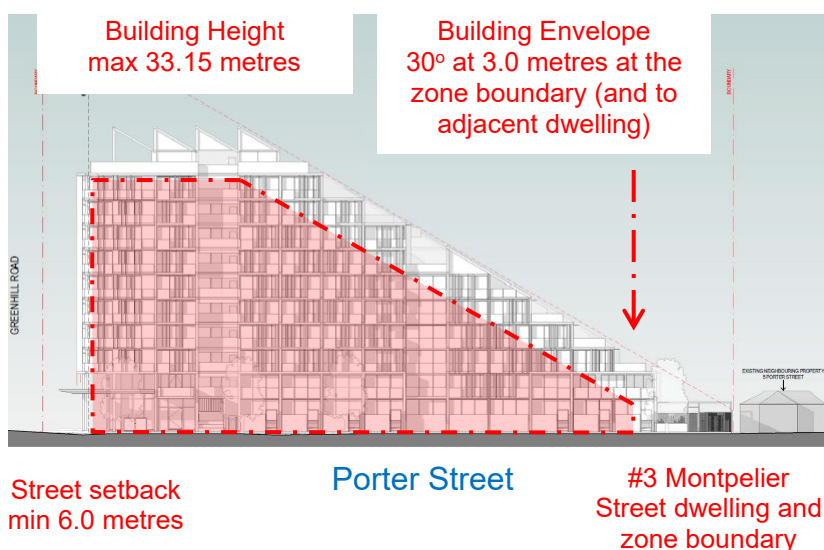
Building Height
max 33.15 metres



Greenhill Road Elevation



Rear South Elevation



- The more critical intrusion is in relation to the Building Interface Envelope (30 degrees at 3m agl). The envelope should be from the zone boundary (adjoining residential use in an adjacent low rise Neighbourhood Zone), which was carefully and consciously aligned upon introduction of the new Corridor Zone, to provide a proper and orderly demarcation between diverse scales of development, limit overbearing building mass and overshadowing;
- The interface policy and desired intent has been undermined, with inclusion of the adjoining dwelling property beyond the zone boundary, creating intrusion into Porter Street with substantially more building mass and visual impact, and exacerbating overshadowing, to the adjoining low-rise Neighbourhood Zone;
- The Local Heritage Place on the northeast corner will be integrated into the development, joined to the rear by the new eastern building, and complemented by an open landscaped setting to the street frontages;
 - the retention, conservation and integration of the important original extent of the existing listed Local Heritage Place (Meaghay House) is positive;
 - the integrity, setting and context of the Place and its heritage values have generally been reasonably respected in the design;

- there is a lack of detail of the proposed alterations to the external appearance of the Local Heritage Place, including conservation works and making good works, which needs to be confirmed as part of the approval or made a Reserved Matter for detailed assessment and further approval;
- The desired minimum 6.0 metre setback from Greenhill Road for the western tower building is not observed thereby compounding streetscape impacts:
 - compromised by a reduced setback to the building façade (4.5 to 5.1 metres) and projecting ground level canopy (to within 2.0 metres) leading to a large and tall façade overbearing the street, with a limited scale of planting and lack of trees to the street frontage;
 - inappropriate reference to the datum of the adjacent building setback to the west, which has a substantive setback over 6 metres with open projecting balconies to 4 metres. It is a building of only of 2 storey height, and is not comparable to a 11 storey building vertical rise and mass;
 - The minimum 6.0 metre setback desired outcome for future new development should at least be respected, if not more in regard to Local Heritage Place setting and landscaping, and not existing incongruous context, and some relief and scale of landscaping provided to the street frontage;
- Side street (minimum 2 metres) boundary setbacks respected (and slightly more generous in parts to reflect previous policy for a clear 3 metre side street setback) helping contribute to the desired outcome of a landscaped building setting along the boulevard and side streets, albeit the proposed trees canopy will be restricted by the limited building setback;
- Rear boundary setbacks (minimum 3 metres within the zone and 5 metres to different zone) are respected and exceeded;
- Two Significant Trees, including large the *Corymbia maculata* near northwest corner and *Lophostemon confertus*, near northeast corner, are to be removed without evident justification and to the detriment of their contribution to the streetscape and greening of site. The required proposed replacement trees are not specifically nominated. With the endemic plants theme the suggested iconic *Eucalyptus Leucoxydon* (SA Blue Gum) could be located adjacent to Greenhill Road in the central plaza area (adjust basement levels to afford natural deep soil) to create a positive landmark tree planting feature;
- A range of other trees designated as 'exempt' (one on site being within 10 metres of the existing dwelling on-site albeit this is being removed as part of the development site) and adjacent to the street boundaries, some possibly are street trees that will require applicable Council approval and plans for suitable replacement, and supplementing (see Street Trees);
- Deep soil (minimum 7% = 370m²) available primarily around street frontages to existing building and rear southwest boundary (over 800m² = 15%), but

otherwise excavation is to, or close to, boundaries, side streets and under much of remainder of site limiting scale of planting in internal areas;

- Landscaping Plan conceptual and generally positive but contains errors and conflicts with architectural design plans and lacks supporting detail of species specific locations, dimensions and soil medium for planter beds, and to roof terrace, balconies and courtyards, to discern effectiveness and sustainability of suggested planting;
- Swimming pool location is reasonably distanced and isolated from neighbouring sites, and acoustic report indicates limited use and acceptable noise emissions. The raised level and new construction, together with excavation and building two underground basement levels, to the boundary and adjoining an old outbuilding structure at 8 Montpelier Street, would seem to present challenging and potentially major implications that will need to be addressed;
- Storage areas for the residential apartments (required minimum 2 bedroom is 10m³, 1 bedroom is 8m³ and studio is 6m³) are indicated to be provided in overhead boxes above 108 level 2 basement carparks (2.43m³), 137 cages (104 x 4m³, 30 x 1.8m³ and 3 x 1.9m³) in storerooms in the basement level 2 carpark and various cupboards within the dwellings to provide for the storage requirements. Provides a level of storage for each dwelling but in combinations and internal cupboards which may compromise the practical options for typical larger and less used household goods;
- Dwellings generally do not appear to be provided with private outdoor open balcony spaces other than a small number (required minimum for 2 bedroom is 11m², 1 bedroom 8m² is and studio is 4m²). Majority are to be provided with openable external glazing to Juliet balcony for exposure of living areas to outdoors and fresh air, and otherwise reliance on a range of communal spaces, including roof terrace, co-working and recreation rooms, dog wash, and gymnasium in western tower building, and ground level pool and other plaza spaces. This appears tied to the nature of the land use, which if accepted, should be secured by a condition;
- Overlooking mitigation of direct views to adjacent low density residential private areas and windows to south, and southeast and southwest perspectives, is not comprehensively addressed with only solar and privacy vertical fins for screening, assumed distances to alleviate impact and otherwise a lack of detail, with open glazed frontages of units in eastern tower building and low balustrades/walls to western tower building and roof terrace. Further mitigation would be desired, eg obscure balustrades/walls and additional slat screening above to total height of 1.5 metres;
- Overshadowing may achieve policy for minimum access to sunlight (3 hours per day but not fully illustrated) but does cause significant impacts, particularly in winter, to the immediately adjacent dwellings to the south. Greater detail on

times shadow passes adjoining yards in morning, starts to encroach in afternoons and extra beyond existing buildings shadow would be helpful to quantify level of impact. The increased building height, overall mass and intrusion beyond the interface envelope compound these impacts;

- Energy efficiency claims are to achieve a 5 Star Green Star as-built certified rating, 7 Star NatHERS average rating for apartments, and 5 Star NABERS Energy certified rating for the offices, with inclusion of passive design principles with natural light and cross-ventilation, green outdoor spaces, solar renewable energy generation and rainwater capture and reuse.

Overall, the proposal may reflect the broad intent of the planning policy parameters for a mixed-use, high-rise, and high-density development, but there are some substantial variations from fundamental planning policy design parameters (in particular western tower building over development (height and interface), lack of Greenhill Road setback, overshadowing, and overlooking mitigation) and a lack of detail in several critical aspects that require further consideration and addressing. Collectively there is a compounding effect leading to a substantial variation from the Planning and Design Code.

There are also fundamental issues regarding the impact upon local traffic, parking (on-site and on-street), waste (and other) large vehicle servicing, public realm infrastructure (hard and soft) and on-street parking controls.

In the event where approval is contemplated several matters require ongoing conditions that address the specific nature of the land use, waste and servicing arrangements and times avoiding peak hours, on-site parking (vehicle and bicycle) allocation to respective users, overlooking mitigation treatments and landscaping plan details.

Council Issues

Council specific comment is provided pursuant to Planning, Development and Infrastructure Regulations 23 (3) in relation to the following matters and the direct implications and impacts upon the local area:

- Essential infrastructure:
 - Electrical power transformer;
 - Fire Booster
- Vehicle traffic, access and parking (on-site and on-street);
- Waste Management and Servicing;
- Stormwater management and flood mitigation;
- Public open-space;
- Other public assets and infrastructure in the public realm:
 - Street trees;
 - Pedestrian footpath and verge;
 - Encroachments;

- Construction Management Plan;
- Local Heritage Place.

Essential Infrastructure

Electrical Power Transformer

A screened enclosure is proposed in the southwestern corner than houses the electrical power transformer for the site.

The location and design treatment to the enclosure appears reasonable. Access is required to the street with gates, but the landscape (and architecture) plans indicate a proposed tree located directly in front.

The respective detail should be addressed and correlate. Additional on-site landscaping and trees is encouraged so planting where feasible should be retained.

Fire Booster Cabinet

A fire booster cabinet is proposed on the north western corner, indicated to be finished in 'manor red' to match the red feature colours of the western building.

The location and finish appear reasonable. Good access to the cabinet and for pedestrians between the building is afforded.

Vehicle traffic, access and parking

Vehicle Traffic

The anticipated traffic generation rates and distribution for the large and intensive scale of development is significant and requires further analysis and consideration as follows:

- Traffic Generation rates adopted in the transport report are from the NSW RTA's Guide to Traffic Generating Developments 2002, which is a respected guide, and indicates the following traffic generation rates:
 - High Density Residential Flat Building generates 0.29 weekday peak hour trips per dwelling and 3 daily trips per dwelling (assumed rate based on peak hour rate being 10% of daily trips) or 68 and 700 in total respectively;
 - Office and Commercial generates 2 evening peak hour trips per 100m² GFA and 10 daily trips per 100m² GFA or 24 and 120 in total respectively;
- Based on the above rates, the proposed 233 apartments and 1,189m² commercial space would generate up to 92 peak hour and 820 daily increased vehicle movements;
- It is indicated from previous quoted surveys that the existing site generated 22 and 37 trips per hour during the AM and PM peak periods respectively, but with the majority via Porter Street, and that during the AM Peak, 65% of traffic was to/from the south on Porter Street, and during the PM peak, 55% of traffic

was to/from the north on Porter Street. This data has been used to determine the traffic distribution for the site, with the total traffic movement split 60% to/from the north (Greenhill Road) and 40% or to/from the south (Montpelier Street to Regent Street);

- The proposed development focusses all vehicle movement upon Montpelier Street, albeit the narrower option, but to avoid the significant disruption and conflict with the priority and busy Rugby Street / Porter Street Bikeway;
- Montpelier Street existing vehicle movement volumes have been surveyed in the past and are indicated to be 42 in AM peak to 50 in PM peak and 320 to 770 vehicles per day (or average of 475vpd). This will increase by an additional 22 to 28 movements in peak hours (92 less expected 22 to 37 and with 40% distribution to south) and average 300 daily movements (820 with 40% distribution to south). This represents an average increase of 70% to 800 (from current 475) in daily vehicle movements. This is significant, and in what is quite a narrow and heavily parked street, but is within the desired capacity limits for a local residential street (500-1,500vpd) in Unley;
- No additional information is provided regarding the location, date or time of the existing use surveys undertaken making it difficult to analyze the data and determine if the distribution is appropriate for the site and nature of proposed development. The site was previously only used for office/commercial activity, whereby using the data to determine the traffic distribution for the residential component may be inappropriate;
- Private Car Sharing may help to reduce needed effective parking numbers, in turn reduce level of movements and therefore traffic;

To determine the impact of traffic generated by the site, as well as determine the appropriate traffic distribution on the surrounding network, it will be necessary to undertake peak hour turning movement counts at the following key intersections:

- Greenhill Road / Montpelier Street;
- Montpelier Street / Regent Street;
- Regent Street / Porter Street;
- Regent Street / George Street;

Following these further surveys and analysis (i.e. SIDRA analysis of intersections pre and post development to determine impact) the likely traffic distribution and the resultant impacts upon side streets and key intersections can be ascertained;

Following the above actions, Council will be able to determine the level of any support, or not, of the traffic generation and distribution and its impact on the local road network;

Also, to note, the ongoing future development of adjacent sites and corridor will lead to a compounding issue for movements on Greenhill Road, and particularly side streets and local network, which will need ever more critical consideration into the future.

Vehicle Site Access

Appropriate vehicle access is generally provided, but some matters of detail require attention, as follows:

- Montpelier Street:
 - Vehicle access to the basement carpark is proposed via widening the existing crossover, with dimensions provided in accord with the Planning and Design Code and swept path assessment for B85 and B99 design vehicle simultaneously entering and exiting the site, which is considered acceptable;
 - the plans are unclear if a pedestrian sight triangle has been provided adjacent the vehicle exit lane to Montpelier Street, in accordance with Australian Standards. Need to ensure a pedestrian sight triangle at least 2m x 2.5m is provided and ensure all landscaping within the sight triangle is kept below 900mm;
 - it is indicated remote control access will be provided for basement car park users, but the location and type of remote-control access to be used is unclear, and noting that visitor parking in the basement car park will require some type of intercom device;
- Greenhill Road:
 - Vehicle access to the existing at-grade car park is proposed via slight widening of the existing crossover to Greenhill Road, with dimensions provided in accord with the Planning and Design Code and swept path assessment for B85 and B99 design vehicle simultaneously entering and exiting the site, which is considered acceptable;
 - The plans do indicate that a pedestrian sight triangle is provided for in accordance with AS2890.1, being at least 2m x 2.5m, which is acceptable, subject to all landscaping within the sight triangle being kept below 900mm;

Application, approval and agreement on design, specification, and payment of costs by applicant with Council is required in relation to the closure, changes and new crossovers, on-street parking signage and/or line marking.

On-site Vehicle Parking

The overall on-site parking provision, is outlined as follows:

- Total of 232 dwellings which the policy requires:
 - 165 spaces for resident occupants (studio 26 @ 0.25 = 6.5, 1 bed 190 @ 0.75 = 142.5, 2 bed 16 @ 1.0 = 16 (no 3+ bed) and therefore 165 in total);
 - 58 spaces for visitors (232 @ 0.25 = 57.5);
- Total nominated commercial (office) floor area of approx. 1,200m² (1,214m² quoted in Architecture Plan Set page 60 and 1,189m² gross leasable floor area in Traffic Impact Statement page 9) which the policy suggests requires:
 - 36 spaces for commercial occupants and visitors (commercial 1,189m² @ 3/100m² = 35.7 in total);

- The commercial gross leasable floor area should be confirmed by the applicant, noting per the policy requirement it relates to:

Gross Leasable Floor Area = Means the total floor area of a building excluding public or common tenancy areas such as malls, hallways, verandahs, public or shared tenancy toilets, common storage areas and loading docks;

Total floor area = Means the sum of the superficies of horizontal sections of a building or other roofed area made at the level of each floor (including any mezzanine floor), inclusive of all roofed areas and of the external walls and of such portions of any party walls as belong to the building;

- The 58 residential visitor spaces can reasonably be shared to also service the 36 commercial occupant and visitor spaces, where the office hours are limited to weekdays periods of low residential visitor demand and fully available to be utilised out of business hours when residential visitor demand is higher and spaces are not designated for any individual user;
- A total of 224 spaces is required pursuant to the policy, providing above sharing arrangements are confirmed;
- A total of 209 spaces is provided for the development comprising:
 - 108 spaces at the level 2 lower underground basement;
 - 94 spaces at the level 1 upper underground basement;
 - 7 spaces in the grade level drop off parking area for complementary alternative taxi/uber access and short-term visitors;
- The proposed overall provision of carparking falls short of the policy standards by 15 spaces;
- Demand upon the limited local on-street parking available is already at a premium and cannot reasonably service further increased development demand;
- Visitor parking required pursuant to the standards takes into account a general availability of on-street parking and further displacing these requirements by increased demand upon the limited available on-street parking is not reasonable;
- The proposed lower provision of carparking is suggested to be justified by the heritage adaptation constraints of the site, advocated lower car ownership of the 'Build-to-Rent' residential model, and comparison to Melbourne inner city development examples:
 - While inner city areas may have similarities, Adelaide is not yet like Melbourne, with less access to different forms of public transport, relatively easy access to unrestricted on-street parking, cheap off-street parking in the CBD, as well as the ability to drive to/from the CBD in a relatively short period of time. This leads to a heavy reliance on cars when compared to inner city Melbourne. 'No Car' ownership is 8.7% and 2 or more 45.8% in Parkside compared to the Melbourne suburbs examples ranging from 16.3% to 36.9% and 10.8% to 27.2% respectively, a vast difference in expectations and an inappropriate comparison (2021 Census Data);

- Further, while there may be a difference and possibly likely lower demand with the 'Build-to-Rent' model compared to normal apartment dwellings, this form of development is not separately defined and therefore not guaranteed going forward. The nature of the development would need to be conditioned as part of the approval to ensure its nature (and lower parking demand) remains into the future;
- The proposed allocation of spaces has not been indicated but this will be critical to ensure appropriate, efficient and optimised function and servicing of the likely parking needs, particularly with reduced provision and spaces at a premium;
- The allocation of parking spaces to help effectively service the respective needs should be designated, noting that the total provision of 209 is 14 short of the required amount of 223. This may be limited in the total development context, but needs to be addressed by reduced dwelling numbers or practical compromise on resident or visitor provision as best as is possible, which may mean as follows:
 - 108 spaces at the level 2 lower underground basement for resident occupants;
 - 43 spaces at the level 1 underground basement for resident occupants, in a suitable segregated, and secured if necessary, clearly delineated area;
 - this leaves 81 dwellings without any parking provision, rather than anticipated 67 dwellings by the recommended standards. The nature of tenant, proximity to public transport, bicycle networks, car sharing and taxi services would have to be relied upon by these residents;
 - alternatively the resident visitor parking could be reduced by 14 to 44 and resident parking increased to required 57 in level 1 basement, or some compromise combination, but concern is held that on-street parking is at such a premium and in high use by a range of existing developments that further imposition on demand is inappropriate;
 - resident permits for exemption from on-street parking time restrictions for a new development will not be provided;
 - 51 spaces at the level 1 underground basement for resident visitors which can also mutually be shared for the 36 required for commercial occupants, subject to condition on complementary trading hours, in a clearly delineated area off the basement entry ramp and adjacent to the lifts;
 - 7 spaces at the grade drop off car park area be time limited (eg 15/30 mins) to ensure efficient turn-over and availability for drop-off-and-pick-up and short-term visitors;
 - the availability of the residential visitor spaces and reciprocal sharing for commercial users should be clearly identified, and their use encouraged by appropriate signs around the site, including in particular at the main vehicle entry point off Montpelier Street and within the grade level short-term drop off parking area for re-direction of longer-term visitors.

The provision of on-site parking should also be future proofed and adaptable, and with the nature of the accommodation and sustainability ethos it would suggest there should be provision for:

- Electric Vehicles parking allocation and charging points within the car parks;

- Car Sharing service and arrangements to satisfy resident vehicle user needs but potentially allow reduction in the amount of individual parking spaces and level of vehicle use and in turn level of traffic movements into the local network.

The basement level parking is entered off Montpelier Street and will need to be managed to:

- operate security shutter door (little detail) indicated on the main entry ramp;
- This main entry ramp security shutter door will need to remain open to facilitate use by commercial occupants, their visitors and residential visitors;
- The main entry ramp security shutter door should remain open for the extent of business hours (condition from 7:00am to 7:00pm) and for reasonable residential visitor hours (7:00am to 10:00pm) to foster ready access;
- The 51 commercial and visitor spaces within level 1 basement should not be allocated to specific users or purpose to ensure convenient and efficient use by the commercial occupants and their visitors, and sharing by residential visitors, at all times;
- the security shutter door should have a tenant telecom communication to accommodate late visitors entry;
- the security shutter door should have an automatic exit accommodated to allow for visitors to leave after hours.

The proposed DDA space provision is appropriate:

- 5 disabled spaces are indicated (2 @ level 2 basement, 2 at level1 basement and 1 at grade level short term drop off car park);
- The commercial space requires 1 space per the Building Code of Australia (1/100 spaces or part thereof or 1/50 spaces or part thereof for a shop with less than 100 spaces);
- The residential dwellings (Class 2) generally do not require spaces per the Building Code of Australia unless their nature is Class 1b or 3. However, provision for less mobile residents would be positive.

Subject to revisions and confirmation of appropriate arrangements, a 'Parking Management Plan' would be necessary as part of the approval documents, or as a Reserved Matter for subsequent approval, to provide a clear, comprehensive, readily accessible and enforceable terms that address in specific detail the on-site access and parking provisions and their operational arrangements, including:

- resident parking spaces allocation in basement level 1;
- visitor parking spaces (reciprocal sharing residential and commercial) in basement level 1;
- grade level carpark short-term shared visitor parking;
- limit commercial uses business hours complementary to peak periods of residential visitor demand (eg 7:00am to 6:00pm Monday to Saturday);
- clear identification of visitor spaces in carparks and appropriate directional signs to encourage use;
- avoid monopolisation of visitor parking by tenants and residents;

- bicycle parking allocation and respective identification for commercial tenants, residents and shared visitor use (commercial and residential);
- basement level carpark security door management to remain open during day-time 7:00am to 10:00pm and the arrangements for after-hours access and egress for occupants and visitors;
- waste vehicle servicing arrangements and hours (avoid peak hours, ie service between 10:00am to 3:00pm Monday to Saturday);
- general servicing, deliveries and furniture removals etc vehicle access, loading and unloading arrangements.

In addition, additional conditions should be included ensuring appropriate form of residential land use is confirmed, waste servicing hours, provision of signs around the site and on main entry that highlight and encourage the availability of parking areas and spaces for visitors.

On-street Parking

On street parking in the locality is at a premium with high demand and limited supply whereby adequate on-site parking should be provided and avoid undue additional demand imposition upon existing on-street parking from new development:

- Greenhill Road is indicated to potentially provide 5 on-street spaces but is affected by a Bikeway and Clearway (7:00am to 10:00am & 3:00pm to 7:00pm Monday to Friday) with 2 Hour on-street parking (10:00am to 3:00pm) but outside of these times the kerbside parking is unrestricted;
- Porter Street frontage is indicated to potentially provide 12 on-street spaces but is affected by the Rugby Street/Porter Street Bikeway and on-street parking restrictions (eastern side No Parking between 8:00am to 10:00am Monday to Friday – resident permit exempted and on western side 2 Hour parking at all times – resident permit exempted) but outside of these times the kerbside parking is unrestricted;
- resident permits for exemption from on-street parking time restrictions will not be provided for a new development post 2013 per Council Policy;
- The new crossovers to basement carpark and loading dock in the narrow Montpelier Street and with truck maneuvers to loading dock will lead to impacts and loss of current on-street car parking, including potentially the loading zone on the opposite side which may need to be relocated and cause loss of additional existing parking spaces further along the street, thereby needing an updated analysis to address all the impacts for the on-street parking circumstances.

Closure of the existing Porter Street crossover would afford some compensation overall but would not address implications in Montpelier Street. Noting that should the on-street loading zone need to be relocated, the implications and loss of this and other existing on-street parking will need to be considered in relation to the overall parking situation. All associated costs of any changes must be borne by the applicant;

- On-street parking in such high demand established areas serves a broader need within the locality and cannot, and is not, a reliable alternative to on-site provision;

Existing on-street parking restrictions will not be changed to cater for any needs of the specific development. Periodic review occurs when warranted by general locality circumstances and optimisation of on-street parking efficiency;

On-street parking exemption permits are not allowed for new developments post 2012 and all users will need to abide by the applicable on-street parking restrictions.

Bicycle Parking

The proposed development accommodates a range of bicycle parking spaces but is not clear about the provision and location of visitor parking spaces (albeit there is ample public space available):

- Bicycle parking requirements encompass:
 - 58 resident bicycle parking spaces required ($232 @ 0.25 = 2.5$);
 - 8 commercial occupant bicycle parking spaces required ($1,214m^2 @ 1/200m^2 + 2 = 8.0$);
 - 23 resident visitor bicycle parking spaces required ($10 @ 0.1 = 1$);
 - 1 commercial visitor bicycle parking spaces required ($1,214m^2 @ 1/1,000m^2 = 1.2$);
- The Transport Report indicates that 215 bicycle parking spaces will be provided across the site, 206 spaces across the two basement levels, 9 spaces at ground level adjacent Porter Street and a parking rail adjacent the office use for visitors;
- However, the architectural plans indicate only 106 bicycle parking spaces, in a secure compound on level 1 basement (only storage areas located in secure compounds in level 2 basement), which exceeds required 58 resident spaces but does not address other requirements;
- Commercial occupant 8 bicycle parking spaces is not evident on plans, unless some of the basement levels provision is to be allocated for this purpose;
- Visitor bicycle parking is also not indicated, but there are ample public and plaza areas where the 24 visitor spaces can be provided adjacent to the series of main entries;
- The access and egress, safety and convenience for users to, and within, the basement bicycle parks should be considered as part of the design;
- The Transport Report indicates that End of Trip facilities will be available for the office use, however the architectural plans indicate that only one shared changing room and one shared shower/toilet will be provided on the level 1 basement car park. To encourage more people to ride for transport purposes, including commuting to work/office space, better provision of end of trip facilities should be provided.

The updated Traffic and Parking report, and the architectural design, should confirm the requirements and location of the required number of bicycle parking

spaces for residents, commercial occupants and visitors. The bicycle parking provisions and operational arrangements should be reflected in the updated 'Parking Management Plan' as part of the approved documents, or as a 'Reserved Matter, for subsequent approval.

The secure parking locations within the basement are preferred for long term employee and resident spaces, and longer-term visitor spaces (commercial and residential) with short-term visitor spaces provided at ground level, all with convenient and clearly visible locations for convenience, ease of use and safety.

Waste Management and Servicing

The proposed waste management arrangements are noted, with the following comments provided:

- The applicable policy provides for:
 - service vehicle movements to be separate from passenger vehicle parking areas;
 - waste to be stored, serviced and collected on-site;
 - forward entry and forward exit, although reverse entry and forward exit may be acceptable as a compromise;
 - movements to avoid interruption of operation of, and queuing on, public roads and pedestrian paths;
- The indicated approach provides for:
 - a separated and dedicated Loading Dock via Montpelier Street for waste collection and loading activities;
 - reversing arrangement and simple manoeuvres generally accepted taking into consideration the site constraints, narrow width of Montpelier Street and low traffic volumes (average 474 vehicles per day – November 2021 Data);
 - Waste Management Plan assessment per Zero Waste SA Better Practice Guide Waste Management confirms volumes, separate streams, chutes and acceptable provision for collection bins, storage, washing etc.;
 - it should be confirmed all movements and swept paths can and will occur via Greenhill Road;
 - a vehicle swept path assessment for a 10.5m Waste Truck shows appropriate access to the Loading Dock via a reverse movement in and forward direction exit, but it is unclear if suitable clearances and limited number of corrective manoeuvres is provided for;
- The Waste Collection arrangement does not address the existing on-street Loading Zone located on the eastern side of Montpelier Street opposite the loading dock, that operates between 9am-5pm Mon-Fri, whereby:
 - an updated analysis is needed addressing all the impacts upon the on-street circumstances and consideration of a reduced length of maximum vehicle (eg 8.8 metres);

- should the on-street loading zone need to be relocated, the implications and loss or reconfiguration of the loading zone and other on-street parking will need to be considered and all associated costs of any changes borne by the applicant;
- The loading dock and truck arrangements are lacking and inconsistent, whereby there needs to be confirmation by further detail and dimensions on plans and in traffic design analysis there is:
 - Confirmation of adequate height clearance for expected waste and loading vehicles and activities in architectural plans;
 - adequate depth and working clearance to rear of expected waste and service vehicles to ensure there is no encroachment beyond the site boundary and adequate space is available at the rear for manoeuvring, loading and unloading nominated large waste bins, typical large furniture, equipment and other goods;
- The Transport Report indicates the loading dock could be used for smaller commercial vehicles at times for other services, maintenance, furniture removals/arrivals etc. However, the proposed Loading Dock does not provide direct or convenient access to the western building tower apartments. Additional information and explanation is required to address how the loading dock will be managed and access to all the apartments will be provided. The Build to Rent model would be expected to generate high levels of turnover and residential loading activities, which need to be catered for wholly within the site.
- The Transport Report also indicates the Greenhill Road short-term drop-off car park may be used for residential loading deliveries/collections for furniture etc given its proximity to the main foyer of the western tower apartment building. However, this car park and swept path assessment for the car park only relates to passenger vehicles. To determine if this car park is suitable for such residential loading activities, additional information on the type and limits to the size of loading vehicle that would be suitable to enter, park and exit (in a forward direction) is required. The approval should include an appropriate condition to reinforce these limits and provide suitable information signs on-site.

An updated Traffic and Parking report, and corresponding architectural plans, should be provided confirming the loading dock arrangements and providing an updated turn swept path assessment, with suitable clearances, for a nominated accepted maximum length vehicle (eg maximum 8.8m length waste collection vehicle and a Medium Rigid Vehicle (MRV)) on Montpelier Street and analysis of the implications upon the public verge, street trees, other infrastructure and existing on-street parking controls. Alternatively, suitable clearance could be provided for these service vehicles by limiting their maximum size which can be accommodated by on-street conditions.

The design and operational arrangement should be confirmed in a 'Servicing Management Plan' to address waste and general delivery, servicing and removals vehicle needs (eg head clearance, manoeuvres, standing etc), operational arrangements and service hours restrictions.

Conditions should be included, subject to revisions and confirmation of appropriate arrangements, for the loading dock, waste and large service vehicles only to visit the site from and to Greenhill Road and outside peaks hours between 10:00am to 3:00pm Monday to Saturday (excluding Sundays and public holidays), and size of vehicles able to use the loading dock and short-term drop-off car park respectively.

Stormwater management and flood mitigation

Stormwater management

The large scale of development and site coverage requires on-site management of stormwater detention and retention to address peak discharge rates, water quality and reuse of water:

- Existing site has high site cover around 78%, which can impose high peak outflow rates and implications for local stormwater management;
- In accord with Council's preference the outflow from the site should be limited to pre-developed conditions and suitable reduced discharge rates to address nominated storm conditions and local drainage system capacity;
- The Stormwater Management Plan demonstrates:
 - stormwater will be captured, managed, and detained for all events up to and including a 1% AEP storm (Annual Exceedance Probability);
 - limitation of peak outflow rate, retention of water for reuse in building and landscaping, and mitigation of water quality discharged from the site.
 - detention to limit all flows from a 1% AEP storm to existing 10% AEP flows from the site given the limited capacity of the downstream systems;
 - provision for detention of 44m³ (44,000 litres) of roof and overland flow water in two 22m³ suitable tanks, one under the main entry ramp and one in the north east corner of the site;
 - basement car park driveway ramp is open to the elements whereby a Trench Grate is proposed at the base to collect stormwater runoff and via dual submersible pumps (6.0 litres per second each) directed to the junction pits or grated inlet pits at the ground floor level;
 - overland flow water where practicable, runoff from hardstand areas and grade car park would be directed to garden beds bio retention swales and appropriate end-of-line gross pollutant traps to remove pollutants prior to discharge to the Council stormwater system;
 - retention of 8,000 litres in a suitable tank (eg 3.35m diameter by 2.2m high) to provide water for reuse within the development (eg toilet flushing,

landscaping etc), but its location has not been incorporated into the architectural design plans;

- Stormwater discharge is indicated to be directed to the Montpelier and Porter Streets underground drainage pipes which in turn feed into the main Greenhill Road drainage pipe.

The stormwater arrangements are reasonable, subject to final design of appropriate bio retention swales, end-of-line gross pollutant traps and details and locations of the required detention and retention tanks.

Any stormwater pipe under the footpath crossing to the street will require suitable specification, prior permit approval and cost recovery from the owner/developer pursuant to Council policy and procedures.

Flood mitigation

Available flood modelling indicates portions of the property are affected to a minor degree, up to 0.5 metres, by a 1% AEP storm (Annual Exceedance Probability) flooding event and impacts upon the design of the development need to be verified:

- the ground floor levels vary between the architectural plans and engineering plans, eg eastern tower design matches to existing building at 46.11 but engineering level indicate 46.25 and western tower 45.8 and 45.75 respectively;
- the top of kerb to east average around 46.0 and west 45.5;
- from the surrounding roads sufficient freeboard should be provided to prevent stormwater flows in a 1% AEP storm entering the ground floor of the buildings;
- from Montpelier Street sufficient freeboard should be provided to prevent stormwater flows in a 1% AEP storm entering the basement carpark, and otherwise measures to capture and pump any water to the street;

Appropriate investigations, setting of building floor levels, external areas flow paths and prevention of entry to basement carparks, and necessary water pumping, have been addressed but there are some final discrepancies and measures that need incorporation into the detailed design phases. Further suitable engineering advice should be provided in conjunction with liaison with Council on satisfactory local design solutions.

Public Open Space

The City of Unley has the lowest area of public open space at around 3% and the highest residential area average population density at 2,740 per square kilometer in Adelaide. The northern suburbs of the City being located adjacent to the City of Adelaide Parklands helps with access to additional open space. The provision of additional public open space, or publicly accessible spaces and greening with development, is always encouraged.

The development of such a large site presents an opportunity to contribute to the open space and/or greening of the locality, and the following is noted:

- The allocation of land, or financial contribution in lieu, for open space in this case is not required given it is for commercial development, and the residential 'Build-to-Rent' model does not provide for land division of the dwellings;
- The site and areas around the heritage place afford generous outdoor landscaped space that benefits the appearance of the site, setting for the heritage place and the general amenity of the property, and most appears open to public access;
- It is trusted public access will be available, albeit it is appreciated this cannot necessarily be guaranteed, to contribute these benefits to the community.

Other Public Assets and Infrastructure in the Public Realm

Street Trees

Redesigned and new crossovers to Montpelier Street, and basement site excavations and finished alignment of retaining walls to the Montpelier Street boundary and within 1.0 metre of Porter Street, and other works may result in loss of some trees and potential significant impacts to the root zones of the other proposed retained trees.

The proposed tree removals are generally appreciated but will require prior permit approvals and costs recovery from the owner/developer pursuant to Council policy and procedures.

Further detail will be required regarding the design and management of works to ensure protection of the existing street trees from excavations and during construction works.

Discussion is encouraged with Council to explore the potential impacts, risk management and opportunity for 'like for better' suitable tree replacements, and proposals for additional street tree planting to complement the development, enhance and green the public realm.

Pedestrian Footpath and Verge

Site excavations, new crossover and other works will impact the public infrastructure to Greenhill Road, Montpelier Street and Porter Street.

Further detail will be required regarding the design and management of works to ensure ongoing operation of pedestrian movement, protection of the street existing trees, footpath and any other infrastructure during construction.

Any hoardings, closure and new crossovers, will require suitable design, specification and prior permit approvals and costs recovery from the owner/developer pursuant to Council policy and procedures.

Any damage and reinstatement of footpaths and verge will be managed, and costs recovered from the owner/developer, pursuant to Council policy and procedures.

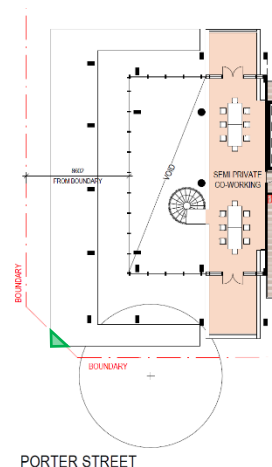
Discussion is encouraged with Council to explore a possible ‘like for better’ replacement approach to enhance the public realm for the new development.

Encroachments

The existing building and proposed new tower buildings are setback from Greenhill Road, Montpelier Street and Porter Street. However, the ground level canopy to the western tower building extends to within 2.0 metres of Greenhill Road and 1.0 metre of Porter Street

This leads to the north-western corner of the cantilevered canopy encroaching over the Greenhill Road and Porter Street property corner cut-off into the road reserve.

Accordingly, this encroachment will need to ensure critical clearance for head room height over the footpath, any existing or new street trees and/or service infrastructure.



An Encroachment approval will be required from Council. The encroachment over the public realm is cantilevered and lightweight which enables it to be addressed by Council’s standard policy licensing requirements.

The applicant should be reminded of the requirement for an Encroachment Permit.

Refer to <https://www.unley.sa.gov.au/Page/Forms-Applications> for applicable forms for public realm matters.

Construction Management Plan

A ‘Construction Management Plan’ as part of approved documents or as a Reserved Matter for subsequent approval in liaison with Council before commencement is critical to the appropriate local management of the substantial implications during the large and extended construction period.

A comprehensive ‘Construction Management Plan’ is required to be resolved, with the Council, prior to Development Approval and commencement to avoid undue external impacts during construction, eg:

- *Construction Management Plan be developed and agreed prior to Development Approval to mitigate undue impacts upon the locality; including:*
 - *Staging to contain activity to the site;*
 - *Local traffic requirements including construction access/egress and heavy vehicle routes;*
 - *Construction and tradesperson vehicle parking (including alternative provisions);*
 - *Adjacent building protection (eg outbuilding on boundary 2 Montpelier Street) including appropriate Dilapidation Report;*
 - *Works in the public realm;*

- *Hoardings;*
- *Public pedestrian footpath management;*
- *Operating hours and noise control.*

These requirements should be reinforced and resolved prior to development commencement through a condition of approval or Reserved Matter allowing for further subsequent approval of details, in liaison with Council.

Local Heritage Place

The retention, conservation and integration of the important original extent of the listed Local Heritage Place (Meaghay House) is welcomed and supported. The City of Unley Heritage Adviser report is attached.

The integrity, setting and context of the Place and its heritage values have generally been reasonably respected, noting key comments on the proposed developments impact as outlined below:

- The proposed towers are imposing and dominating but this must be considered in the context of the zone policy;
- In a way the imposing scale contrasts and makes the Place more prominent in the streetscape;
- While the design and detailing of the proposed new towers is very different, there are reference points and cues taken which accentuate and respond to the Place; including height datums, suitable setbacks and variations in materials and finishes;
- There is a lack of detail of the specific works to and within the Place, including the extent of 'making good'. The visualisations indicate it will essentially remain as it appears today. This detail should be clarified.

The missing detail needs to be confirmed as part of the approval or made a Reserved Matter. It is critical to ensure that any proposed alterations to the external appearance of the Local Heritage Place, including conservation works and making good works, are subject to detailed assessment and further approval, in consultation with Council's Heritage Adviser.

Conclusion

Large development proposals are of great interest to Unley residents and businesses, particularly those near the site.

The Council is not the assessing planning authority, and only a referral agency able to make comments on direct impacts on local public infrastructure, but the local implications are of interest to the ongoing long-term success of the development and locality.

The nature of the large-scale residential development broadly accords with the Urban Corridor (Boulevard) Zone desired outcomes, however, there are highlighted areas of concern with planning design and council infrastructure.

Within this advice there are highlighted areas of concern with planning design and council infrastructure, including:

- western tower building over development, exceeding generous policy bonus height, and more so substantially beyond the critical interface envelope transition to adjacent orderly and proper Neighbourhood Zone boundary and low-rise residential area and local street frontage;
- lack of Greenhill Road setback crowding street and restricting substance of trees along Boulevard frontage;
- Local Heritage Place restoration details confirmed or reserved decision;
- Updated Traffic and Parking Report on outstanding matters;
- 'Parking Management Plan' and associated details on Architecture Plans for various on-site vehicle and bicycle parking needs and arrangements;
- A specific Note that no on-street parking exemption permits are granted for new developments (City of Unley *On-street Parking Exemption Policy*);
- 'Servicing Management Plan' and associated details on Architectural Plans for waste and general delivery, servicing and removals arrangements;
- residential storage;
- overlooking mitigation;
- significant, regulated and other tree removal, replacement, landscaping detail, and street tree impacts and detailed planting plan;
- flooding management and stormwater design details and external connections specifications;
- street trees protection during construction and as part of new building;
- public realm re-design details and specifications; and
- documentation and approvals for council infrastructure impacts, reinstatements, proposed works and encroachments;
- 'Construction Management Plan' to address arrangements for this substantial phase of development and external implications;

that should be addressed as part of the expected comprehensive assessment, additional revised development details, as conditions and/or Reserved Matters as appropriate by SCAP.

Enquiries

If there are any queries or need for further review, explanation or information please contact David Brown, Principal Urban Planner, dbrown@unley.sa.gov.au or 8372 5185.

Yours sincerely



Peter Tsokas
Chief Executive Officer



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Heritage Advice

| | |
|------------------------------|--|
| DA Number | 224198 |
| Property Address: | 163a- 164 Greenhill Road, Parkside CT Vol 5421 Folio 300 & 299 |
| Heritage Listing: | Local Heritage Place (Meaghay House) |
| Proposed Development: | Development of residential and commercial (office) uses adjacent to the Local Heritage Place |
| Overlay: | Local Heritage Place |
| Zone Section: | Urban Corridor (Boulevard) |
| Author: | Anaglypta Architecture Pippa Buckberry |
| Date: | 07/04/2023 |

| | |
|--------------------|--|
| Drawing | Nettleton Tribe Documentation dated 21/12/2022 |
| References: | |

Previous Advice to Applicant:

Various advice from August 2022 to January 2023

Heritage Significance:

Identified in a number of heritage survey's of the area, the earliest a report from the City of Unley Heritage Survey through the National Estate Programme 1977/78 identifying "Meaghay House" (164 Greenhill Road) as a "Category 3" building.

A subsequent re-assessment in 1985 identified the home as a 'fine example of this style of home which was built to overlook the south parklands. It is of particular significance because of its integrity and the fact that there are no so few dwellings which illustrate the earlier residential character of Greenhill Road.'

It was at this point that the dwelling was recommended for listing as a Local Heritage Place, being formally listed on 26 June 1997.

A further review in 2006 updated the heritage datasheet and describes the building in the following way "an excellent example of a Georgian Revival style house constructed after the constraints on construction were lifted after the Second World War. It retains a face brick base course, textured rendered finish, multi-paned Georgian Revival windows and shutters with original brackets, terracotta tiled hipped roof, wide eaves with butt jointed timber lining, timber framed windows, expressed quoins and banded projecting chimney. The building retains a panelled front door with clear glass leadlight fanlight over and clear glazed leadlight sidelights."

The building is identified as meeting the following criteria under the Act;

- 'a) This house displays historical and social themes that are of importance to the City of Unley as it represents the continued construction of residences with The City of Unley as infill or replacement, reflecting the continuing popularity of the area as favoured place of residence once restrictions on building materials were lifted after the War.



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'd') This house displays aesthetic merit and design characteristics of significance to the City of Unley as it is a typical Georgian revival residence of the 1950s (sic) displaying consistent use of typical materials such as masonry walls, hipped roof and classically derived detailing.

The extent of listing includes:

Original external form, materials and details of the Post-War Georgian revival style residence. Any later alterations or additions are excluded from the listing.

Subject Site



Subject Site
(shaded green)

Figure 1, 163A-164 Greenhill Road, Parkside (Subject Site)

Source: SAPP, April 2023

The subject site contains the Local Heritage Place, including an extension in the style of the original dwelling and a connected, contemporary three-storey office, auditorium and library for the Australian Education Union, designed by notable SA architect Keith Neighbour of Cheesman, Doley, Brabham & Neighbour c 1969/70 (note the applicants documentation dates this structure at 1978).

The contemporary additions are identified in Stuart Symons book 'Modernist Adelaide' (page 172) and are described as a "sophisticated use of concrete.... Enlivened by vertical off-form board markings on the concrete surfaces. The office block uses concrete sunhoods to shade the northern façade, and they are connected by vertical projections to the roofline to create the effect of a series of spaced columns. The open, informal arrangement of the office block and auditorium is emphasised by the metal skillions on the stairwell and stage area of the auditorium."

While the Local Heritage Places Overlay extends over the three land titles fronting Greenhill Road, there is no references to the contemporary structure in any of the heritage surveys and regrettably Neighbours addition is not considered to have any demolition protection.

It is however worth noting the ways in which the c 1969 brutalist development respects and responds to the 1930's dwelling, providing an excellent example of contemporary contextual design on the site (refer figures 2-4 below).



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AEU Building c1969

Meaghay House c1935

Figure 2, 163A-164 Greenhill Road, Parkside; with notations by Anaglypta Architecture
Source: Anaglypta Architecture, August 2022



Figure 3, 163A-164 Greenhill Road, Parkside; with notations by Anaglypta Architecture
Source: Anaglypta Architecture, August 2022



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Figure 4, 163A-164 Greenhill Road, Parkside; with notations by Anaglypta Architecture
Source: Anaglypta Architecture, August 2022



Proposed Development

The proposed development seeks to demolish all structures on the subject site except the original external form of the 1930's home (the Local Heritage Place) and construct new residential and commercial (office) structures including two interconnected towers of 9 (behind the Local Heritage Place) and 11 storeys (to the corner of Greenhill Road and Porter Street).



*Figure 5, 163A- 164 Greenhill Road, Parkside; Proposed Development
Source: Nettleton Tribe, 2022*



*Figure 6, 163A- 164 Greenhill Road, Parkside; Proposed Development
Source: Nettleton Tribe, 2022*



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Figure 7, 163A- 164 Greenhill Road, Parkside; Proposed Development
Source: Nettleton Tribe, 2022

Impact of Proposed Development

With respect to the Local Heritage Place the following Desired and Performance Outcomes are considered relevant.

DO1 Development maintains the heritage and cultural values of Local Heritage Places through conservation, ongoing use and adaptive reuse.

Commentary: This outcome appears to be satisfied. The original external form of the Local Heritage Place is retained in its entirety, although the function and detail of internal modifications and any proposed external works are only vaguely described in the proposed plans.

PO 1.1 The form of new buildings and structures maintains the heritage values of the Local Heritage Place.

Commentary: This outcome is satisfied. Each of the criteria for which the structure is listed as a Local Heritage Place, 'a' & 'd', would still be met and are still relevant and evident within the remaining fabric.

PO 1.2 Massing, scale and siting of development maintains the heritage values of the Local Heritage Place.

Commentary: The 9 and 11 storey towers adjacent to the Local Heritage Place are of an imposing scale, dominating the appearance of the original two storey dwelling. However, there are some mitigating factors which must be considered, and which assist in integrating the proposed development with the Local Heritage Place;

- 1) it is recognised that the Urban Corridor Zone anticipates a higher density in this locality of 7 stories (if not for the Local Heritage Place) and that additional density allowances are given for the retention of heritage places.*
- 2) The design of the adjacent towers has taken some cues from the Local Heritage Place, including height datums, suitable setbacks and variations in materials and finishes which accentuate and respond to the Local Heritage Place.*
- 3) In some ways the scale of the proposed development highlights the Local Heritage Place, the contrast making the building more prominent within the Greenhill Road streetscape.*



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PO 1.3 Design and architectural detailing (including but not limited to roof pitch and form, openings, chimneys and verandahs) maintains the heritage values of the Local Heritage Place.

Commentary: While the design and architectural detailing are vastly different to that of the Local Heritage Place, as identified in the commentary's above, there are some reference points to the Local Heritage Place and fundamentally the retention of the original dwelling form maintains the essential heritage values of the place.

PO 1.4 Development is consistent with boundary setbacks and setting.

Commentary: Given its context within the Urban Corridor Zone, the proposed new development provides sufficient boundary setbacks, which have been informed by the placement and sightlines to and from the Local Heritage Place.

PO 1.5 Materials and colours are either consistent with or complement the heritage values of the Local Heritage Place.

Commentary: This outcome is satisfied. The materials and finishes proposed appear to compliment and take some of their cues from the Local Heritage Place. Of particular note is the relationship of the ground and first floors of the 9 storey tower, directly behind the Local Heritage Place and the 3rd to 10th floors of the 11 storey tower, adjacent to the Local Heritage Place, which appear to pick up on the terracotta and rendered tones and qualities of the Local Heritage Place.

PO 1.6 New buildings and structures are not placed or erected between the primary or secondary street boundaries and the façade of a Local Heritage Place.

Commentary: This outcome is satisfied. The Local Heritage Place remains visible and prominent to Greenhill road, its primary street frontage, and Montpelier Street, its secondary street boundary.

PO 1.7 Development of a Local Heritage Place retains features contributing to its heritage value.

Commentary: This outcome appears to be satisfied; all the significant features of the Local Heritage Place appear to be retained. However, there is a distinct lack of detail regarding any proposed works to the Local Heritage Place, including the extent of 'making good'. The visualisations provided give the impression that the building will essentially remain as it appears today, however it is recommended that this be clarified or that a condition on the approval be included to ensure that any proposed alterations to the external appearance of the Local Heritage Place, including conservation works and making good works, be either subject to separate development approval or further consultation with Council's Heritage Advisor.

PO 2.1 Alterations and additions complement the subject building and are sited to be unobtrusive, not conceal or obstruct heritage elements and detailing, or dominate the Local Heritage Place or its setting.

Commentary: The proposed development does not conceal or obstruct heritage elements or detailing. However, the proposed development clearly dominates the Local Heritage Place and its setting. As outlined above, there are some mitigating factors which must be considered, and which assist in integrating the proposed development with the Local Heritage Place;

- 1) it is recognised that the Urban Corridor Zone anticipates a higher density in this locality of 7 stories (if not for the Local Heritage Place) and that additional density allowances are given for the retention of heritage places.*



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- 2) *The design of the adjacent towers has taken some cues from the Local Heritage Place, including height datums, suitable setbacks and variations in materials and finishes which accentuate and respond to the Local Heritage Place.*
- 3) *In some ways the scale of the proposed development highlights the Local Heritage Place, the contrast making the building more prominent within the Greenhill Road streetscape.*

PO 2.2 Adaptive reuse and revitalisation of Local Heritage Places to support their retention in a manner that respects and references the original use of the Local Heritage Place.

Commentary: This outcome is satisfied. The Local Heritage Place has previously been adapted to an office, rather than residential function, this appears to be continued by the proposed development.

PO 6.1 Local Heritage Places are not demolished, destroyed or removed in total or in part unless:

- a) *The portion of the Local Heritage Place to be demolished, destroyed or removed is excluded from the extent of listing that is of heritage value*
or
- b) *The structural integrity or condition of the Local Heritage Place represents an unacceptable risk to public or private safety and is irredeemably beyond repair.*

Commentary: The portion of the existing structure proposed for demolition is excluded from the extent of listing being a later addition to the original 1930's home.

PO 6.2 The demolition, destruction or removal of a building, portion of a building or other feature or attribute is appropriate where it does not contribute to the heritage values of the Local Heritage Place.

Commentary: There is limited detail provided regarding the specific works to and within the Local Heritage Place. As identified above, it is recommended that either these details are articulated, or be the subject of a separate Development Application.

PO 7.1 Conservation works to the exterior of a Local Heritage Place (and other features identified in the extent of listing) match original materials to be repaired and utilise traditional work methods.

Commentary: There is limited detail provided regarding the specific works to and within the Local Heritage Place. As identified above, it is recommended that either this detail is provided, or be the subject of a separate Development Application.



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3 Porter Street
(Proposed for
demolition; within
Historic Area Overlay)

Figure 8, 163A- 164 Greenhill Road, Parkside; Proposed Development
Source: Nettleton Tribe, 2022

With respect to the development which falls within the Historic Area Overlay (Residential Compact Parkside North Historic Area Un6) and the proposed demolition of 3 Porter Street, Parkside, the existing dwelling (c1980) does not conform with the values described in the Historic Area Statement and therefore may be demolished.

Conclusion

On balance, and in consideration of the nature of the development within the Urban Corridor Zone, the proposed development is considered to satisfy the relevant Desired and Performance Outcomes with respect to the identified Local Heritage Place.