1 February 2023

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

SCAP REFERRAL – Regulation 23 (2) (b) - COUNCIL COMMENTS
DA 22043120 – 119 Greenhill Road Unley

Thank you for referral of the above-mentioned application. Council appreciates the opportunity to provide comment to assist the planning assessment process by the State Commission Assessment Panel (SCPA).

The nature of development encompasses:

"7 level residential flat building with associated carparking and landscaping"

Council seeks to provide comment on designated Council matters in accord with Regulation 23 (3), and any observations on key local planning matters that require further analysis and assessment, to assist SCAP (State Commission Assessment Panel) appreciate the implications upon the orderly and proper planning of the area and the local 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 subregulation (3) *within 15 business days after the request is received* – 10 January therefore 1 February 2023

Regulation 23 (3) provides that *the following matters are specified for the purposes of a report under subregulation (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 subregulation (2)(b). (Nothing specified).

CITY of VILLAGES

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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, 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

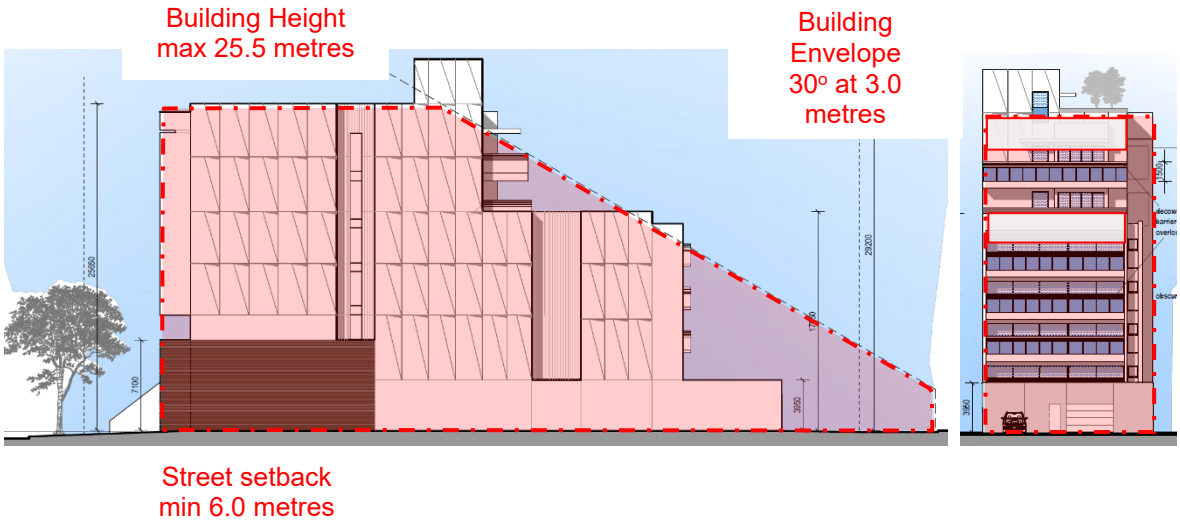
Generally, the proposal reflects the broad intent of the Urban Corridor (Boulevard) Zone and applicable policy but encompasses some variations.

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, the desired outcome and policy intent should be properly observed, and variations from policy limited.

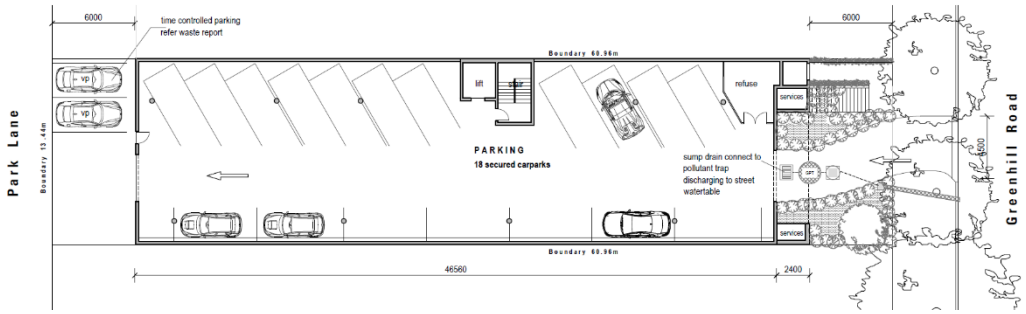
In brief, the following planning observations are made in relation to the proposed development notable features and variations from policy:

- Site is small and narrow with frontage to Greenhill Road and Lane of 13.41 metres, overall depth of 60.96 metres and an overall area of 814.45 square metres;
- Amalgamation for a larger site for functional efficiency and building setting would have been preferrable but policy is ineffective to help achieve this;
- Development is modest in intensity in comparison to typical smaller dwellings (80m^2) with only 10 larger dwellings (1 x 2 bedroom 130m^2 and 9 x 3 bedroom 150 to 250m^2). Still a net density over 120 dwellings per hectare, well above the minimum of 75 d/Ha;

- Height to seven (7) levels (with roof terrace) and 25.7 metres reasonably respects policy of seven (7) levels and 25.5 metres, albeit variation for notable lift/stair shaft overrun to 29.2 metres (plus 3.7 metres or 15%);



- The Building Interface Envelope (30 degrees at 3m agl) from the boundary of an adjoining residential use in an adjacent low rise Neighbourhood Zone to limit overbearing building mass, overshadowing and provide a proper and orderly demarcation between diverse scales of development has been generally respected, apart from the notable lift/stair well overrun and other intrusions contributing to visual mass and exacerbating overshadowing;
- The appearance is typical of such buildings and generally appropriate. A prominent lower podium and recessive upper levels is achieved through different material and colour rather than a clear 2m setback;
- A 6.0 metre Greenhill Road setback to the building façade is provided which is a positive for the local character and accommodating landscaping and required medium tree to the front (6-12m tall and 4-8m canopy);
- Rear lane setback of 6.5 metres from opposite side, and 0.4 metres from boundary, provided for;
- Side boundary setbacks largely respect new policy allowing building 'boundary to boundary' for first 18 metres depth, ground level for entire property length and 2 metres for levels above (change from previous policy for a clear 3 metre setback to ground and all levels, on one side at least for narrower sites, to allow for desired building separation and a boulevard landscaped building setting);
- The building is at grade level with an area for landscaping to the front, with around 45m^2 exposed deep soil (require 7% or 57m^2 of deep soil).
  The natural deep soil and tree roots could expand under the building to support the landscaping and the one required medium size tree (6-12m tall and 4-8m canopy spread). The species of Japanese Maple is not specified to ensure the appropriate size.



Further, there is no softening landscaping to the rear resulting in a harsh fully paved area to the rear lane (also see Waste Management and Servicing);

- Additional greening is indicated with a roof terrace and raised vegetable garden and orchard areas, but specific details of the planting medium and species for sustainability and greening effect is not provided;
- Storage areas for the residential apartments (required minimum 2 bedroom $10m^3$ and 3 bedroom $12m^3$) are indicated to be provided in cupboards and pantries within the dwellings. To meet occupant needs for associated larger and less used goods and equipment this may not be appropriate. Adequate storage for all typical household goods is an important feature for practical use by residents.
- Overlooking mitigation to adjacent low density residential private areas appears addressed regarding the new policy for balcony and roof terrace areas with obscure glazing and additional slat screening above to total height of 1.5 metres;
- Overshadowing may achieve policy for minimum 3 hours per day access to sunlight but does cause impacts in mornings in winter to the immediately adjacent dwelling to the south. The building intrusions beyond the interface envelope contribute to this. Further, the change in the new policy to relate the interface envelope threshold to the adjacent property boundary rather than as previously to the zone boundary (centre-line of lane) increases this impact;
- Energy efficiency appears to include passive design with natural light and cross-ventilation but is not specified nor the sustainability efficiency documented.
  Solar panels do not appear to be included.
  Deep soil, one tree and landscaping to the front, and roof terrace planting areas afford some greening to help heat mitigation.

Overall, the proposal respects the fundamental planning policy parameters. There are some limited variations and lack of detail that should be carefully considered.

Council Issues

Council specific comment is provided in relation to matters regarding the impacts and direct implications upon local infrastructure:

- Essential infrastructure:
  - Electrical power transformer;
- Vehicle traffic, access and parking;
- Waste Management and Servicing;
- Stormwater management and flood mitigation;
- Other public assets and infrastructure in the public realm:
  - Street trees;
  - Pedestrian footpath and verge;
  - Encroachments.

Essential Infrastructure

Electrical Power Transformer

There are two locations identified at the front of the building for 'services'. It is unclear if, and where, an electrical transformer is needed and will be located with the required open area service access. This matter should be confirmed, as a later inclusion will compromise the design, landscaping and streetscape appearance.

Vehicle traffic, access and parking

Vehicle Traffic

The anticipated traffic rates and distribution for the proposed 10 dwellings is modest and reasonable:

- Anticipate up to 7 weekday peak hour and 64 daily vehicle movements;
- traffic distribution assumptions indicate 2 entry & 5 exit movements during the AM peak hour and 4 entry & 3 exit movements during the PM peak hour;
- the level of traffic generated by the site is expected to have minimal impact on the nearby local road network;
- ongoing future development will lead to a compounding issue for movements in Greenhill Lane and the locality which will need to be considered.

Vehicle Site Access

Appropriate vehicle access is provided, as follows:

- Single entry via new 4.5m wide left-in only crossover via Greenhill Road (subject to Department for Infrastructure and Transport (DIT) review and approval);
- Exit via existing crossover to Park Lane;

- Proposed crossover must be installed to Council satisfaction;
- Costs associated with required changes for crossover, on-street parking signage and/or line marking are to be covered wholly by the applicant.

Vehicle Parking

The overall parking provision per the policy provisions, is as follows:

- Total of 10 larger dwellings requires:
  - 12 spaces for resident occupants (1 @ 2b x 1 = 1 and 9 @ 3 bed x 1.25 = 11.25 and 12.25 in total);
  - 2 (or 3) spaces for visitors (10 @ 0.25 = 2.5);
- The development total parking provision reasonably meets the requirements:
  - 18 spaces at grade level enclosed under main building;
  - 2 spaces at rear grade level off Greenhill Lane is considered justified and reasonable for expected demand;

The car parking is proposed to be managed to:

- provide for exclusion of parking in the visitor spaces (suggested 10:00am to 3:00pm Wednesdays) to accommodate the proposed waste servicing arrangements;
- while demand should be low it is a 5 hour time window and not a desired option in regard to Waste Management and Servicing;

The car parking configuration and design dimensions require revision:

- the proposed 90-degree visitor parking accords with Australian Standards;
- parallel parking spaces accord with Australian Standards;
- the 4.5m wide access aisle and 5.4m length for the 60-degree parking spaces does not meet Australian Standards:
  - the access aisle width should be at least 4.9m and space length of at least 5.7m (when measured from wall to end of space);
  - in order for the proposed 5.4m space length to meet the Australian Standards, wheel stops must be installed for all the 60-degree parking spaces;
- to support the reduced 4.5m access aisle for the 60-degree parking spaces, a turn path assessment should be provided which confirms a B99 vehicle entering and exiting all critical parking spaces (end spaces, spaces adjacent lift/stair well) with suitable clearance and number of corrective manoeuvres.

DDA accessible parking is not understood to be necessary pursuant to the Building Code of Australia for solely Class 2 residential development.

An updated Traffic and Parking report should be provided confirming the design, dimensions and turn paths for the 60-degree parking and appropriate access, egress and manoeuvrability in accord with Australian Standards.

Subject to revisions and confirmation of appropriate arrangements, additional conditions should be included ensuring appropriate car parking spaces allocation,

visitor spaces are properly designated, access and egress is facilitated and convenient with appropriate pedestrian access enabled and provision of signs that highlight and encourage the spaces availability and use for visitors.

Bicycle Parking

The proposed development does not appear to provide required bicycle parking spaces (albeit a small number) and does not address why:

- 2.5 resident bicycle parking spaces required (10 @ 0.25 = 2.5);
- 1 visitor bicycle parking space required (10 @ 0.1 = 1);
- Visitor bicycle parking to be provide in public place adjacent to main entry off Greenhill Road;

The updated Traffic and Parking report, and the architectural design, should also confirm the requirements and provision of the number and layout of bicycle parking spaces.

Waste Management and Servicing

The proposed waste management arrangements are noted, but the following concerns and comments are provided:

- The applicable policy that all waste should be stored, serviced and collected on-site with forward entry and forward exit (although reverse entry and forward exit may be acceptable) which has been indicated but in an inferior manner;
- The waste and recycling volumes generated by the development, as confirmed by the analysis against the *State Better Practice Guide (Zero Waste SA, 2014),* albeit solely a residential service, exceed Council's current waste and recycling collection capacities. Therefore, a separate commercial rear-lift skip bin service is required;
- The Traffic and Parking report provides a turn path assessment for a Waste Collection vehicle at least 10m in length. The assessment shows the vehicle entering the site in a forward's direction and exiting in a forward's direction, and standing in parallel position to the boundary. However, given the size of the vehicle and limited width of the site, there is very minimal, if any, clearance between the waste collection vehicle and Park Lane. This presents an unacceptable risk should a driver not be able to enter and exit the site exactly as shown in the Traffic and Parking Report on every occasion, and thereby leaving a portion of the vehicle likely protruding into Park Lane, which is not considered acceptable;
- The Waste Management Advice indicates that approved waste contractors have a range of different truck sizes, ranging from 7m to 10.5m in length. Based on this, and in order to provide safe, convenient and minimised disruption to traffic the waste collection to and from the site, it is preferred that all waste vehicles access the site via a reverse manoeuvre and then exit the site in a forward's direction;
- To facilitate the reverse manoeuvre and truck standing wholly on-site the rear enclosed carpark should be further setback (parking provision exceeds

standards and enclosed area could be reduced) and/or the rear roofed area raised and the door opening suitably increased in height to accommodate the specified waste and service vehicles;

- This is a more convenient, safe and expeditious manoeuvre and places the truck closer to the waste storage area reducing the time for bin transfer and disruption, and enables a reduced width of central paving and potential provision of landscaping to the east and west sides to soften the appearance and heat load of the rear paved area.

An updated Traffic and Parking report should be provided confirming the arrangements and providing an updated turn path assessment for both a 10m waste collection vehicle and a Medium Rigid Vehicle (MRV) reversing into the site from Park Lane and exiting the site in a forwards direction. Noting that if suitable clearance from Park Lane is not able to be provided for a 10m Waste Collection vehicle, then the maximum size of a Waste Collection vehicle that will be supported for this site is a Medium Rigid Vehicle (MRV).

Subject to revisions and confirmation of appropriate arrangements, additional conditions should be included confirming appropriate arrangements for Waste and service vehicles and that they only visit the site between 10:00am to 3:00pm Monday to Saturday, excluding Sundays and public holidays.

Stormwater management and flood mitigation

Stormwater management

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

- On site stormwater management is not specified;
- Existing site has high site cover but is not entirely impervious with large landscaped area to front yard and smaller areas to rear;
- A Stormwater Management Plan should be provided demonstrating:
  - how 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 insufficient capacity of the downstream Palmerston Creek channel;
  - alternatively, undertake catchment specific computations for the local and broader catchment hydrograph to determine detention that ensures no increase in downstream flows in Palmerston Creek in a 10% AEP storm;
- As a guide, the City of Unley Stormwater Management Fact Sheet, indicates for a commercial site under 1,000m^2 a tank of 6,500 litres is required, 5,000 litres for retention and 1,500 litres for detention;

- Appropriate management of site stormwater volumes and rates of discharge is required to address compounding issues upon local and downstream drainage systems and to ensure new development makes a minimum equitable contribution to this compounding issue;
- Stormwater discharge should be directed to Greenhill Road where there is an underground pipe, and not Greenhill Lane which only has surface drainage, and outflow directed through equidistant spaced discharge points along the frontage which do not individually exceed a rate of $5m^3$ per outlet.

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 the property should not be affected by a 1% AEP storm (Annual Exceedance Probability) flooding event but impacts upon the design of the development need to be verified:

- the ground level from Greenhill Road has sufficient freeboard to prevent stormwater flows in a 1% AEP storm entering the 'ground floor' carpark;
- it is unclear if these levels are below the street level or not (no levels have been provided;
- if the ground floor carpark is above top of kerb then this requirement may be disregarded.

Other Public Assets and Infrastructure in the Public Realm

On-street Parking

On street parking in the locality is at a premium with high demand and limited supply whereby on-site parking should meet all reasonable needs and not impose additional demand upon on-street parking:

- Greenhill Road is 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;
- The new crossover will lead to the loss of one on-street carpark contributing to the lack of available spaces and need for adequate on-site spaces;
- Existing on-street parking restrictions will not be changed to cater for any needs of the specific development. Periodic review occurs where the general locality needs and optimizing efficiency of parking will be considered;
- 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.

Street Trees

Site excavations, new crossover and other works may pose impacts to the root zones of the existing two mature street trees to the Greenhill Road frontage.

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

Pedestrian Footpath and Verge

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

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

Any hoardings, and the new crossover, 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 cost recovery from the owner/developer, pursuant to Council policy and procedures.

Encroachments

The apartment building is setback from the front Greenhill Road and rear Greenhill Lane frontages whereby there is no encroaching canopies or structures.

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

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.

The highlighted areas of potential concerns with parking, waste servicing and landscaping should be addressed as part of the expected comprehensive assessment 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