

3 August 2016

The Secretary
Development Assessment Commission
GPO Box 1815
ADELAIDE SA 5001

Attention: Connie Parisi

Senior Planning Officer
Investment Management - Development Division
Department of Planning, Transport and Infrastructure

Dear Sir/Madam

**INFORMAL REFERRAL COMMENTS – DA 090/M004/16
179 GREENHILL ROAD (and 1 GEORGE STREET) PARKSIDE**

Thank you for your informal referral received on the 6 July 2016 of the above-mentioned application lodged with the Development Assessment Commission, and invitation for comment within 4 weeks (3 August) to assist the assessment process.

In accord with the Heads of Agreement with the State Government in relation to such applications, Council now provides informal comment on designated Council matters and observations on key local planning matters that may require further analysis and assessment.

Council Matters

Council is able to provide specific comment in relation to matters where there are direct implications upon local public infrastructure as follows:

- street trees and footpath paving
- vehicle access, traffic, servicing and parking
- storm-water management

Street trees and footpath paving

There are two mature Dutch Elm (*Ulmus x hybrida 'hollandica'*) street trees on Greenhill Road that will need due regard, arborist advice and liaison with Council's officers to ensure any unacceptable damage is avoided from excavations and construction of the light weight front fence and any other nearby structures.

Another smaller less mature Ornamental Pear exists in a protuberance on George Street that should not be affected by the development. Normal operational practices would be able to deal with any issues that arise.

Any footpath paving disturbed from construction, and the altered or relocated cross-overs, would be reinstated or compensated through normal operational practices.

Vehicle access and traffic

Access

A small visitor vehicle area and waste servicing will occur from a slight widening of the existing northern cross-over off George Street behind the existing building. This cross-over is approximately 30 metres from Greenhill Road intersection.

The main tenant and resident vehicle entry and exit occur via a relocation of the existing double cross-over at the southern end of the site to the southern side of the tree protuberance in George Street. This is considered appropriate.

Provision is made for a paved reversing area within the visitor parking area to allow the waste truck to turn-around on-site and exit in a forward direction.

The revised access points do not affect any major infrastructure, including the current bus stop (northern side of protuberance).

The anticipated traffic movements are low and not considered significant or cause for an increase in safety risk. The congestion in George Street, particularly in peak hours, will lead to some inconvenience entering and exiting the site at times, but with due care these movements should be appropriately safely negotiated.

Traffic

The traffic advice on trip generation and the directional distribution assumptions are considered fair. The estimated 47 morning and 31 afternoon peak hour movements is low and will have minimal impact on the operation of George Street.

The traffic modelling shows there will be minimal impact to the intersection of George Street and Greenhill Road, or to George Street.

It is noted that while queuing south of the signals, and for periods when the bus is at the stop outside the site, would impact on vehicles trying to exit the site there were sufficient gaps and platooning occurring that generally vehicles would be able to exit without significant delays.

In considering the site and intersection circumstances, the traffic impact from the site is considered unlikely to be significant.

Waste Servicing

Separate waste stream systems and storage areas to adequately serve the development needs are located within the front building and within the apartment tower and will be serviced by private contractor from the visitor carpark area.

The waste vehicle will be able to turn-around on-site within the visitor parking area in a designated reversing area to be able to exit the site in a forward direction.

The offices, and particularly café, are to have a series of small bins stored internally and taken for collection daily multiplying the number of collections. It would be preferable for smaller bins to be transferred to the larger bins in the dedicated storage area and thereby reduce the required frequency of collection.

Service times will need to be limited to after 9:00am and before 4:00pm Monday to Saturday to avoid peak periods and facilitate safe and convenient movements.

Parking

At grade visitor parking is provided between the existing and new buildings for 7 vehicles, plus 1 for the disabled.

Current Development Plan standards indicate a need for 29 resident visitor spaces whereas the accepted contemporary apartment standards indicate 14.

In mixed use scenarios the visitor provision can be shared – 7 to 8 should be adequate for the offices but the 6 additional resident visitors will need to rely on the on-street spaces around the site – 4 on east side and 3 on west side of George Street and 2 on Greenhill Road after hours – which the standard would normally regard as being already an available in addition to the standards requirements.

Internal car parking is provided below and within the new building for a total capacity of 100 spaces, comprised of 85 spaces and a possible extra 15 within double stacker bays (subject to 'market' demand).

Recently updated Development Plan standards (Minister's Activity Centres DPA) indicate a need for 27 commercial spaces (3 per 100m² for any non-residential use) with an estimated split of 20 for tenants and 7 for visitors.

Current Development Plan standards indicate a need for 87 resident spaces whereas the accepted contemporary apartment standards indicate 63.

Considering the proximity (cycling or walking) to the CBD and adjacent public transport, the provision of 85 spaces is adequate (requirement of 83 = 20+63).

More information and confirmation is required on the allocation of spaces to ensure adequate commercial tenant parking of 20 spaces or more is provided.

Within both the tenant and resident parking there should be provision made for spaces for the disabled, as per the Australian Standards, to avoid compromising availability of the visitor space for disabled.

Allocation of some additional visitor spaces in the internal parking area would be beneficial.

Failure to provide adequate allocated commercial parking will lead to an over-spill of all-day parking into the visitor area, already over-taxed for residential visitors, or into adjacent local streets.

Bicycle parking for 80 bikes is provided on-site. Two visitor areas are provided for 10 bikes, 4 behind offices and 6 near residential tower foyer. In the internal parking area, in dedicated storage areas, there are spaces for 12 bikes for commercial tenants and 58 bikes for residents (1 per dwelling). This provision exceeds requirements.

Storm-water management

A limited on-site storm-water retention tank for re-use and detention tank(s) and additional basin for storm-water peak mitigation requirements are indicated in supporting engineering advice.

Planning policy seeks the rate of discharge from the site to not exceed the pre-development conditions, nor the carrying capacities of downstream systems, and the maximisation of storm-water retention for re-use and minimisation of demand on reticulated water supplies relative to the scale of development.

Submitted engineering advice suggests the pre-development impervious area is 59.5% (0.25Ha of 0.42Ha). This is queried, as even the previous fully developed site in 2014 is calculated to be about 0.19Ha (45%) and the current development site, as depicted on submitted plans and in-situ, is 0.1ha (23%). A fair scenario would be to adopt at most a 40% impervious area as per the Brownhill Keswick Creek Stormwater Management Plan modelling assumptions.

Further specifications of the proposed permeable paving would be necessary to gauge its effectiveness and contribution to the pervious area.

An upgrade of underground infrastructure for connection of storm-water is required as part of the development, at the developers cost, as the existing 300mm diameter pipe connecting a side entry pit in George Street to the main on Greenhill Road does not provide sufficient capacity to accept the additional flows generated from the development during a 1 in 10 year storm event.

The retention capacity and roof connection area should be increased to desirably service at least a 20,000L tank capacity.

The detention tank and basin capacities should be increased to ensure discharge flow rates do not exceed the equivalent of a maximum 40% impervious site area for both minor 1 in 10 year and major 1 in 100 year ARI storm events.

Conditions of approval will be required to address increased provision for such tanks and basins and their reflection in the plans, as this is not currently evident, plus obligations to address the upgrade to the storm-water infrastructure.

Council Approval

The Chief Executive Officer or his nominee(s) will negotiate appropriate outcomes in regard to protection of street trees, crossover alterations, storm-water, traffic changes and public realm upgrade funded by the developer should the application be approved.

Key local planning matters

There is compliance with much of the policy guidelines but there are some areas of divergence observed with the Development Plan.

General compliance is considered to occur in respect to the following issues with certain clarification and adjustment:

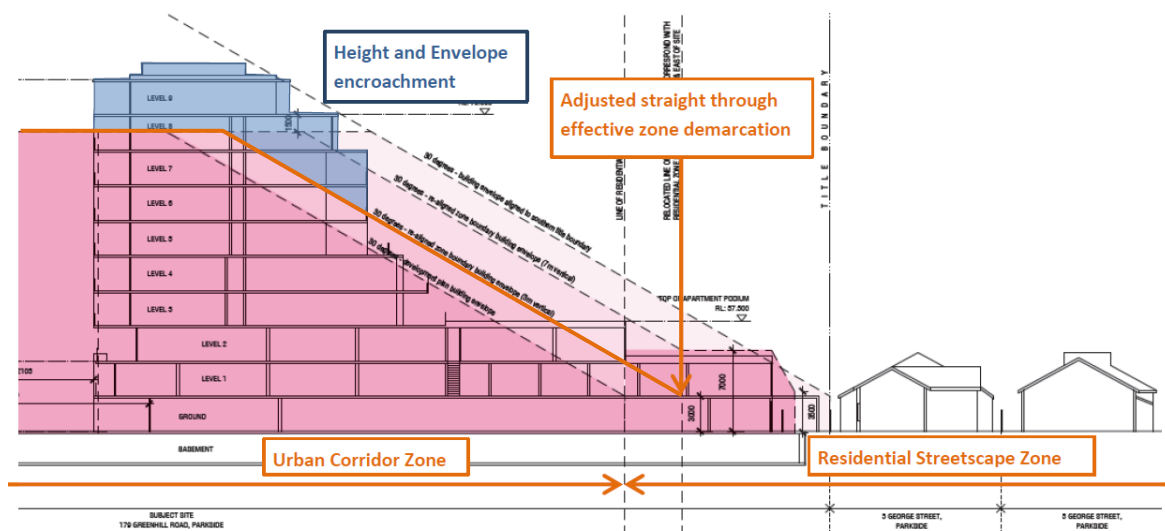
- Retention, restoration, extension and landscaped setting and contemporary new fence referencing the original (circa 1897) of the State Heritage Place is positive, and planning conditions must ensure that the developer cannot skirt this commitment.
- Overall the building design solution given the site constraints is considered of good quality amenity, function and appearance.
- On-site car parking is adequate, dependent upon confirmation of an allocation of at least 20 spaces in the internal parking area for commercial tenants and the 8 at grade spaces are to be only available for visitors. Additional residential visitor parking in the internal parking area would be desirable to avoid potential level of reliance on on-street parking.
- Bicycle parking is above requirements and a positive feature.
- While along the east boundary at lower levels there is some building to the boundary, the tower is setback 3.0 metres and the new office addition has recesses to visually provide a setback.
- The main building to George Street has a varied but minimum setback of 3.0 metres, with a 5 metre setback at the rear to the adjoining residential property.
- Vehicle access via the two points, northern most to small visitor parking area (8), and southern one for main internal parking area (85) is adequate. The traffic advice indicates with the relatively low traffic volumes and peak hour movements the accesses should operate effectively, albeit with cue care necessary.
- Waste stream separation and servicing capacity is appropriate provided that a building janitor is on-site to manage the skip changeover when full. Without this occurring, there is significant potential for putrescible waste to be spilled. Based on the waste and recycling volumes attached to the application, this will occur more frequently than once daily. Relevant conditions of planning approval in regard to waste collection should be:
 - Waste Management Services are to be provided by a private contractor at the expense of the Community Corporation
 - No occupancy of the development is to occur until a building janitorial service has been appointed and a building janitor is on-site. A janitorial

service must always be provided on site to manage waste skips unless alternative arrangements are agreed in writing with the City of Unley.

- Service times are limited to between 9.00am to 4.00pm Monday to Saturday
- Smaller bins within office tenancies and particularly the café be transferred to larger bins in storage area, rather than collected directly, to reduce the required number, frequency and time for collections.
- The waste truck servicing, through careful detailed design and provision of dedicated reversing area, while tight, should allow effective operation to allow forward entry and exit. However, to afford safe and convenient movement to and from the site, service times should be limited to between 9.00am to 4.00pm Monday to Saturday to avoid peak traffic times on George Street.
- Reasonable environmental sustainability building design and treatments are incorporated, although the option for electric vehicle charge points could be added, and there are limited substantial initiatives such as green roofs or walls which are specifically encouraged with new mixed use buildings.

There are areas of divergence observed from policy parameters in respect to the following issues:

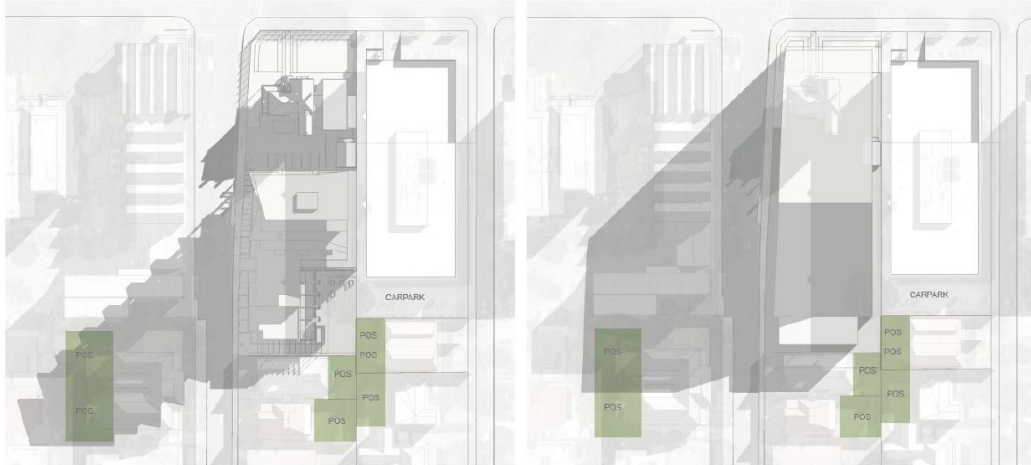
- The ten (10) storey building exceeds the desired seven (7) storeys but more critically the proposed 30.0 metres height exceeds the policy guideline of 25.5 metres (over by 18%). The additional 1.4 metres roof is well recessed from the edges to reduce its adjacent visibility, but not from long range views (over by 23%).
- The critical 30 degree rear building envelope is not observed from the zone boundary leading to additional building mass and overshadowing to existing adjacent residential properties to south east and south west in the morning and afternoon. This is contrary to the future orderly and proper planning for consistent and equitable development in the corridor and relationship with adjacent residential areas.



- While this construction over 1 George Street avoids undue shadow to 3 George Street, the 10 storey tower is 15 metres closer than expected to 3 George pursuant to the resolved policy and does pose increased over-shadowing to residential properties to the south east and south west.

Proposed 9:00am 22 June

Envelope 9:00am 22 June



Proposed 3:00pm 22 June

Envelope 3:00pm 22 June



- Retention and incorporation of the significant tree (*Phytolacca dioica* - Ombu), is listed in the Unley (City) Development Plan and one of the oldest and largest such species in the State, into the rear courtyard is positive. However, further appropriate careful consideration of excavation encroachments and impacts from building are required in the detailed planning, design and protection during construction to ensure the long-term stability, health and vigour of the tree.
- Unreasonable short-range overlooking of adjacent residential private areas, particularly directly to the south but also to the south east, needs to be addressed, ie by screening (eg obscure glass to 1.6-1.7 metres) to the outer edge of planter boxes to first level townhouses rear 'terraces' and wings on southern side of top of external spiral stairs. Some higher level rear windows are treated, and the Ombu tree in south east corner offers some long-range screening from some balconies to the south-east but open long-range views remain to south and south-west which should be

better addressed by alternative orientation or improved levels of screening to avoid down-ward views.

- A limited on-site storm-water retention tank for re-use and detention tank(s) and additional basin for storm-water peak mitigation requirements are indicated in supporting engineering advice.

Planning policy seeks the rate of discharge from the site to not exceed the pre-development conditions and storm-water retention for re-use be maximised.

The pre-development impervious area is suggested as 59.5% when even the previous fully developed site in 2014 is calculated to be about 45% and the current development on-site 23%. A fair scenario would be to adopt at most a 40% impervious area as per the Brownhill Keswick Creek Stormwater Management Plan modelling assumptions.

An upgrade of underground infrastructure for connection of storm-water is required as part of the development, at the developers cost, as the existing pipes do not provide sufficient capacity.

The retention and detention capacities should be increased.

Overall, the proposal has a number of variations from fundamental policy parameters. Some are limited variations, individually of moderate significance, but some are considered substantial variations.

The IMDAC is advised that Council has concerns with the degree of variation from some fundamental planning policy parameters for the redevelopment of 179 Greenhill Road (and 1 George Street) in its current form. The Council requests the range of matters raised in this report be given due consideration as part of the assessment process.

The proposal is for a well-considered and quality design, with high regard for the retention, restoration and improvement of the existing State Heritage Place at 179 Greenhill Road. The preservation of this site is applauded by Council, and Planning Conditions should be imposed on the development to ensure that this restoration is completed as an early stage of the project.

The constraint imposed to the front setback by the Heritage building for new components is appreciated, but there is insufficient respect for the height and particularly building envelope encroachment to the rear. The notion of effectively extending a zone boundary by purchasing and demolishing adjacent contiguous properties is simply an affront to the notion of good and orderly planning. It sets dangerous precedents and should be rejected.

The development is simply too tall for the site. More dwellings in lower tower floor plans, to potentially maintain numbers but allow removal of the pen-ultimate floor and reduce the overall height and envelope encroachment, would allow for better regard for the building envelope and transition to the streetscape character residential area.

Conditions

In the event approval is contemplated there are various issues that have been identified where planning conditions are warranted, as follows:

- The size of the mid-floor levels should be increased to accommodate an extra dwelling so a full mid-level may be removed thereby reducing the overall height and particularly encroachment into the Building Envelope to the benefit of better policy conformity and impacts to residential neighbours.
- Unreasonable short-range overlooking of adjacent residential private areas to the south and south east, should be addressed by additional screening, ie obscure glass to 1.6-1.7 metres to the outer edge of planter boxes to first level townhouse rear ‘terraces’ and similar wings on southern side of top of external spiral stairs.
- Albeit some higher level rear windows are treated, and the Ombu tree in south east corner offers some long-range screening from some balconies to the south-east, open long-range views remain which should be better addressed by alternative orientation and/or improved levels of screening to avoid short-range down-ward views.
- Car-parking on-site be allocated to ensure:
 - the at grade visitor parking area is exclusively reserved for use by visitors to the commercial or residential occupants;
 - within the internal building parking area:
 - › a minimum of 20 spaces be allocated and designated for use by commercial occupants of both the tenancy contained within the building and the tenancies (tenancy 4 and tenancy 7) and the remaining commercial tenancies (1,2,3,5,6) external to the building
 - › desirably an increased provision of 6 spaces for residential occupant visitors to complement the at grade provision
 - › a space for the disabled be provided for commercial occupants;
 - paved reversing area for waste service vehicle be appropriately distinguished, signed and reserved for such use at all times.
- Waste service vehicles only visit the site between 9.00am and 4.00pm Monday to Saturday (excluding public holidays) and turn-around on site so as to enter and leave in a forward direction to George Street. Smaller bins within commercial tenancies be transferred to the larger central bins to reduce the number, frequency and time required for collections. The responsibility for waste services must be with the Body Corporate.
- The extent of storm-water managed for re-use on-site be maximised (suggest 20,000L tank and commensurate roof connection area), control of discharge rates be increased to be less than equivalent of 40% impervious area (existing development 23%) including specification of permeable paving effectiveness and contribution as pervious areas.
- The storm-water infrastructure connections to the main infrastructure need to be upgraded as part of the development to provide sufficient capacity to accept the additional flows generated during a 1 in 10 year storm event.

- The increased provision for retention and detention tanks and basins needs to be incorporated into the design and provided for on the plans for the development as such detail is not currently evident.
- The stability, health and vigour of the significant tree (Ombu) needs to be assured by careful management of excavation and impacts under the supervision of a suitable qualified arborist and a physical fence barrier to the tree protection zone during all construction, with all proposed paving and surfaces in the rear courtyard to be suitably pervious to water and air to aid the trees health and long life.
- In accord with expert arboricultural advice, the street trees be protected during construction as appropriate from site excavation for the front fence and any other structures and any pruning be under the supervision of an arboriculturalist (and Council prior approval), with limited intervention and due care to avoid undue impacts upon their health or overall form.
- Staging should be confirmed to avoid leaving an un-useable State Heritage listed building. Greater clarity needs to be provided as to what works are proposed on the heritage building in Stage 2 and Stage 3 of the development. Restoration of the State Heritage Place should be completed before occupation of the new tower complex.
- A Construction Management Plan be resolved with Council to guide the requirements and operations during construction to avoid traffic, parking, pedestrian and amenity issues, and IMDAC be advised that Council will not be in a position to issue Hoarding Permits in Greenhill Road or George Street bearing in mind their significant traffic volumes.
- It is requested a Note be added if the application is approved indicating pursuant to the policy of the City of Unley on-street Parking Exemption Permits are not issued for occupants of new development (post 2013).

I trust this information will be duly considered by the Planning Assessment Officers, Department of Planning Transport and Infrastructure and the Development Assessment Commission (Inner Metropolitan subcommittee) in their deliberations.

Enquiries

If there are any queries or need for further explanation or information please contact David Litchfield, General Manager Economic Development and Planning and/or David Brown, Principal Policy Planner.

Yours sincerely



Peter Tsokas
CHIEF EXECUTIVE OFFICER