

14 September 2015

The Secretary  
Development Assessment Commission  
GPO Box 1815  
ADELAIDE SA 5001

**Attention: Jason Bailey**  
Senior Case Manager  
Strategic Investment  
Department of Planning Transport and Infrastructure

Dear Sir/Madam

**INFORMAL REFERRAL COMMENTS – DA 090/M008/15 (APPIAN ID 585)  
COLANGELO GROUP – 56 GREENHILL ROAD WAYVILLE**

Thank you for your informal referral received on the 13 August 2015 of the above-mentioned application lodged with the Development Assessment Commission, and invitation for comment by the 15 September 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 wishes to provide specific comment, see attached, in relation to matters where there are direct implications upon local public infrastructure as follows:

- encroachments (entry/footpath canopy) into Joslin Street road reserve
- street trees pruning and footpath paving
- vehicle traffic, access servicing and parking

The Council has delegated to the Chief Executive Officer or his nominee(s) the authority to negotiate appropriate outcomes in regard to the pruning of street trees, future public realm upgrade and canopy encroachment in Joslin Street should the application be approved.

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### **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.

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

- 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. Council investigations during the consultation period for the Urban Corridor Zone DPA were specifically focussed on ensuring this type of impact did not occur on residential zones and properties in interface areas. This is contrary to the future orderly and proper planning for the consistent and equitable development in the corridor and relationship with adjacent residential areas
- Unreasonable overlooking of adjacent residential private areas, particularly directly to the south but also obliquely to the south east and south west, needs to be addressed, ie by 1.7 metre high screening (eg obscure glass) to the first level office rear ‘terrace’, rear windows, balconies on east and west sides, with at least south side projecting wing screens if not more measures
- The Greenhill Road setback is 5.83 metres to front wall, but 4.33 metres to projecting ground level canopy and to face of residential balconies. However, the balconies are enclosed on the sides by projecting side walls to 4.33 metres to the east and 3.75 metres to the west, which present as continuous solid elements of the building within the desired clear 6.0 metre front setback
- The Joslin Street setback is 0.0 metres at ground level, with a 1.8 metre wide canopy encroaching over the footpath, and levels 2 to 8 at 0.8 metres setback (with small balconies projecting 0.4 metres) that are all within the desired 3.0 metre side road setback. The canopy encroachment will require Council approval
- Environmental sustainability initiatives are minimal, with limited on-site stormwater detention and green screening wall for portion of bottom level. This is less than policy expectations suggest for water retention and reuse (irrigation, toilets, hot water etc) and energy efficiency (passive design, natural light, cross-ventilation, green roof and/or garden courtyards, solar collection etc)
- Policy seeks development to be adaptable and if 65 serviced rooms are subsequently operated as apartments there would be inadequate parking unless the main office level was substantially reduced and converted to low demand residential to correspondingly reduce overall demand – a matter for the future but one to be aware of as a contingency. Redevelopment of the adjacent property at 57 Greenhill Road in the manner permitted in the Development plan would render the east facing units to a lightless existence.

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, eg rear building envelope and

overlooking. Council acknowledges that the narrowness of the site restricts the ability to fully comply with side setbacks.

Council wishes to advise the Development Assessment Commission (Inner Metropolitan Sub-committee) that Council has concerns with the degree of variation from fundamental planning policy parameters and does not support the redevelopment of 56 Greenhill Road in its current form. It is requested the matters seriously diverging from existing policy provisions in respect to the rear building envelope, overlooking, front and west side boundary setbacks and environmental sustainability be given further consideration as part of the assessment process. Whilst some of these matters have limited material impact on nearby residents and are simply bad design or planning, the first two matters need to be addressed.

### **Conditions**

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

- The rear roller door on Greenhill Lane to remain open from 6.00am to 7.00pm everyday;
- Waste service vehicles only visit the site between 9.00am and 4.00pm Monday to Saturday (excluding public holidays) and reverse from Greenhill Lane into the site and car park, and leave in a forward direction. The responsibility for waste services must be with the Body Corporate;
- 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 that Council may not be in a position to issue Hoarding Permits in Greenhill Lane bearing in mind its narrow width and significant traffic volumes;
- In accord with expert arboricultural advice, the street trees be protected during construction by appropriate fencing and tree protection measures, and for those in Joslin Street the site excavation and pruning be conducted under the supervision of an arboriculturalist, with limited intervention and due care to avoid undue impacts upon their health or overall form;
- Stormwater be managed on-site, quality be addressed and discharge rate be less than existing development;
- If approval of the application in its current form is contemplated, such approval should be conditioned on the applicant agreeing to a Land Management Agreement with Council to recognise that 1 Joslin Street is not suitable to develop for future residential purposes and should remain a carpark.

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.

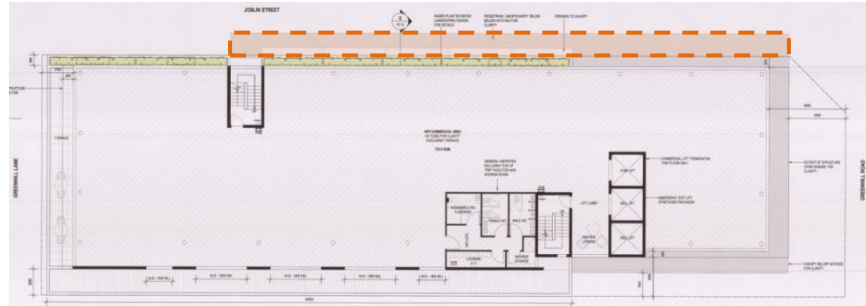
Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Tsokas', with a long horizontal flourish extending to the right.

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

Attachment – Council matters – 56 Greenhill Road Wayville**Encroachments into road reserve**

A canopy at the first level encroaches over the boundary and the footpath of Joslin Street by 1.8 metres for the front three quarters of the building frontage (43 metres).



The desired character for the zone and policy area seeks a 3.0metre setback to side road frontages and if this policy was complied with there would not be any need for an encroachment.

However, the lower level cantilevered canopy is not an integral structure, and assists with articulation of the large western elevation, deflection of wind and protection of pedestrians on the footpath and to the residential entry to the building.

The Administration has delegated authority and guidance from a Council Policy to deal with the detail of the encroachment issues and subsequent approval if satisfied.

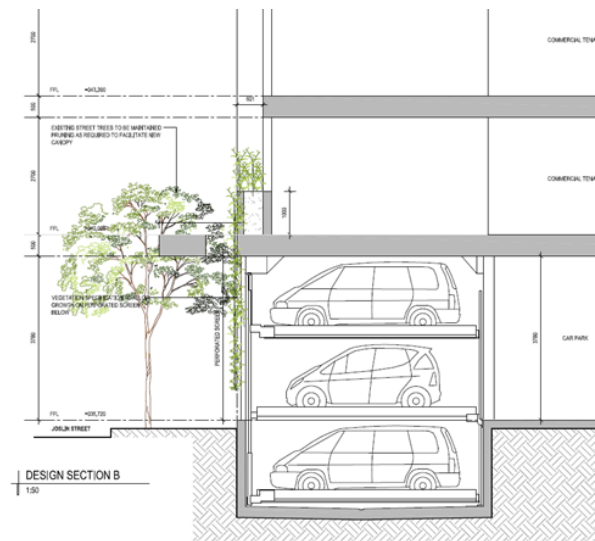
The fundamental issue for Council to consider is in relation to the relative benefit of supporting the canopy encroachment into the road reserve or not in the event the development is granted planning approval and proceeds. The situation is atypical for Greenhill Road but enhances the potential development outcome. If Council chooses not to allow this encroachment, and the development is approved, it could proceed without the canopy.

It is considered that in the circumstances it is appropriate to support the canopy encroachment into Joslin Street.

**Street trees and footpath paving**

There are six mature Desert Ash (*Fraxinus angustifolia*) street trees around the site, five along Joslin Street and one on Greenhill Road. It is generally agreed by the applicant's arborist and Council's officers that the trees are mature and of fair to poor form, but of worthy contribution to the streetscape. Their condition is fair to poor and they are growing in difficult compressed conditions. However, generally the species is hardy and versatile and it is believed they will cope and recover well from pruning. There may be potential for damage to the root zone from excavation for the carpark but this is considered manageable with tree protection and Arboricultural supervision.

At this time the developer is seeking to work with the street trees and prune those in Joslin Street to accommodate the building to the boundary along the rear portion and the northern three to accommodate the projecting canopy. The southern two trees are more in the open and have encroached into the site and couldn't accommodate pruning for the canopy in addition to the building alignment so the canopy is not proposed along the rear portion of the frontage. The northern three trees are already of a more vertical form due to the existing building being to the boundary and can more readily accommodate the canopy pruning.



It is considered, with due care under expert advice, the street trees in Joslin Street can be suitably pruned without undue impacts upon their health or overall form. This would occur subject to the normal Council supervision and applicable costs to the applicant as a result of accommodating the development.

Construction will impact upon the area and footpaths surrounding the site. Alternative arrangements will need to be made during construction. As part of the process, the reinstatement of public infrastructure will be addressed to Councils specifications.

The Administration has delegated authority to deal with these issues, and to reach a mutually acceptable approach.

In the longer-term, the street trees will need to be replaced with a more suitable species. Desirably this can occur in conjunction with an overall public realm upgrade that can support the new development, the status of Joslin Street as a pedestrian and bicycle corridor and a narrowed traffic carriageway, protected parking, water sensitive design and overall enhanced streetscape.

The developer has indicated a willingness to discuss a potential upgrade and a contribution (in addition to that for normal reinstatement) for an improved streetscape to complement the development. Discussions will need to be pursued, if approval is received, towards refining an appropriate design and the level of contribution that may facilitate a suitable upgrade of the streetscape that could occur following completion of construction. The Administration would aim to pursue possible design(s), additional external funding and future coordination with other potential development in this process.

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

#### Traffic

Currently vehicle access/egress into the existing site is from the rear Greenhill Lane frontage. It is proposed this will continue but be via a 5.5 metre wide opening, setback 0.4 metres from the lane, to ground level parking inside the building.

The northern section of Joslin Street carries around 1700 vehicles per day (vpd) and Greenhill Lane 550 vpd. The area of office floor space is similar to the existing office and the additional traffic would relate to the tourist accommodation (serviced apartments).

The applicant has provided limited information and no traffic modelling, but the limited increase in low traffic generating development suggests there will be only minor increases in traffic flows and a minimal change to the operation of the surrounding roads, lane, network and junctions.

The construction of such a large development will be long and complex requiring careful consideration of staging and management of external impacts, notably traffic, parking, pedestrians and environmental emissions. A Construction Management Plan, to the reasonable satisfaction of Council, should be required as part of the approval and before proceeding with the development.

Bearing in mind the narrow width and significant traffic volumes, it is advised that Council will not be in a position to issue Hoarding Permits in Greenhill Lane.

#### Access

Vehicle access and egress is via a 5.5 metres wide opening at the rear of the building 0.4 metres off Greenhill Lane. The restricted opening is tight but the traffic advice indicates it is adequate to afford acceptable movement.

Waste servicing of intensive mixed use development is critical. The capacity of waste receptacles and storage area within the rear south western corner of the building is adequate on the basis of the Zero Waste SA Better Practice Guide.

The waste service vehicle is proposed to reverse into the building from Greenhill Lane, which is tight, but traffic modelling and advice indicates this is reasonable. It is proposed the rear door will remain open during the day-time to facilitate this (and visitor parking). The waste vehicle will then be able to exit in a forward direction.

Vehicles used by the Council contractors will not be able to access the building, and responsibility for waste services must be with the Body Corporate.

#### Parking

Carparking is provided at ground level within the rear of the building. A total of 56 spaces is provided, comprised of 2 spaces for the disabled and 54 spaces within 19 triple stacker bays (less due to required operating spaces). Rear 4 stackers (11 spaces) are for casual users and visitors, with rear roller door left open during

daytime operating hours, and the remaining 15 stackers (43 spaces) are for occupants.

There is provision for 18 bicycles in the secure store adjacent to the residential entry and foyer off Joslin Street. An additional bicycle parking rail is located within the public commercial entry off Greenhill Road for 2 bicycles. The bicycle parking provision exceeds the applicable requirements for 10 bicycles.

The car parking stackers, and internal roller door (and outer door after hours), are accessed by coded operation. Occupants will be familiar with codes but it is indicated visitors will be provided with codes when organising a visit or upon arrival at reception.

The design dimensions of the internal access isle, parking spaces and door openings is tight but indicated to be adequate by engineering advice.

Various methodologies can be applied to assess the adequacy of parking.

The 900m<sup>2</sup> of office would require 32 spaces based upon current standards of 4 per 100m<sup>2</sup> (36 spaces) with a 10% discount (3.6 spaces) as part of a mixed use development and respective peak demands occurring at different times.

There are no specific standards currently in the Unley Development Plan for tourist accommodation. However, based upon SA Planning Policy Library (SAPPL) standards the 65 serviced rooms would require between a minimum of 15 spaces (1 per 4 rooms) and a maximum of 29 spaces (1 per 2 rooms), including a 10% discount (1.6 to 3.2 spaces) as part of a mixed use development.

Consequently, there is an estimated demand between 47 and 61 spaces. The provision of 56 spaces, including access to 12 for casual visitors, is reasonable.

There are currently 2 spaces (out of clearway hours) on Greenhill Road and 8 spaces (an additional space is reserved for Australia Post) on Joslin Street that complement the on-site provision and parking generally in the area.

Because of time delays in the operation of roller doors and car stackers, there were concerns about queuing of vehicles in Greenhill Lane waiting to access the building. The applicant modified the design to create a queuing area inside the building entrance (13.8 metres). These changes have partly, but not fully, mitigated those concerns.

The planning policy also calls for consideration for future adaptability.

The ground level office area is limited (95m<sup>2</sup>). The difference as an office and say a café would only be 4 versus 6 spaces which is likely not significant in the total context.

The proposed tourist accommodation is configured such that in the future it could be disposed as 32 residential apartments (2 studio, 3 one bedroom, 21 two



bedrooms and 6 three bedrooms). Disposed as apartments and based upon proposed Unley standards, or SAPPL standards, they would require between 39 and 48 spaces. This is considerably more than that available as tourist accommodation (24 spaces). Consequently it needs to be appreciated it is likely the first floor level office space with its high demand may also need to be converted to apartments with a much lower relative demand to suit the available provision.

There would appear to be scope for adaptability, but the potential implications upon the dwelling land use option given the fixed and limited car parking provision and inadequacy of proposed small balconies to provide required private open space for long-term occupants needs to be appreciated.