

21 December 2016

Ref: 2016/18753/01

The Secretary
Development Assessment Commission
GPO Box 1815
ADELAIDE SA 5001

Attention: Karl Woehle
(karl.woehle@sa.gov.au)

Dear Sir/Madam

SUBJECT: Variation to DA 090/M008/15 – 56 Greenhill Road Wayville

Thank you for the Informal Referral of the development application for variation of the approval (22 October 2015, subject to a number of conditions) of the *demolition of the existing two storey building and construction of an eight storey mixed use building comprising office and serviced apartments* at the property at 56 Greenhill Road Wayville.

It is noted that recently a six month extension of the consent was approved by the Development Assessment Commission (DAC).

Proposed Variation Application

The Informal Referral was received on the 23 November 2016 regarding a variation to the existing consent. Four (4) weeks is provided for Council to comment, ie 21 December 2016.

It is noted Council comments may only make brief observations regarding the planning assessment to highlight matters for further analysis / assessment by DAC. Comments may include matters of more direct impact for example: local plans, public realm improvements, street trees, stormwater, traffic management, waste services, encroachments, or the like.

The original proposal raised a number of issues for Council. In regard to direct matters they were resolved. A range of planning concerns were raised about a lack of regard for 'Boulevard' desired character, building envelope, height, setbacks, overlooking and environmental sustainability provisions.

None of the direct matters are affected by the current proposed variation.

In summary, from Councils review of the variation it entails the following design changes and planning assessment implications:

Changes	Planning policy implications
Re-arrangement of ground floor foyer with separate residential (Greenhill Road) and serviced apartment (Joslin Street) entries	Functional re-arrangement, although additional entry path and ramp added Limited landscaping area at front reduced further due to additional paved paths
<p>Change to ground floor commercial tenancy (94 to 135m² gross floor area) and introduction of a new dedicated pedestrian entrance from Greenhill Road</p> <p>Level 1 office (900m² gross floor area) to be replaced with 9 serviced apartments (15 bedrooms)</p> <p>A total of 32 serviced apartments (including a number of twin key apartments) comprising a total of 61 bedrooms</p> <p>A total of 15 residential dwellings (2 single and 12 two bedroom)</p> <p>Retain 56 car parks (44 occupant, including 2 disabled, and 12 visitor) at ground level accessible from Greenhill Lane</p>	No overall change to parking requirements
Decrease in the number of bike parks from 18 to 16	Provision still exceeds minimum requirements
Reconfiguration of the northern serviced apartments fronting Greenhill Road from three studio apartments to two 2 bedroom apartments	Noted
Relocation of the conference room, break-out room and gym from level 2 to level 3	Noted
Reconfiguration of the previously approved serviced apartments on levels 5 -7 for residential apartments	Noted
Decrease in the eastern setback of the front portion of the building from 3.0 metres to 2.0 metres	Compromises further the required setback of 3.0 metres, and zone desired character, to reinforce notable gaps between buildings
Decrease in Greenhill Road setback of balconies from 4.33 to 3.84 metres. Building façade maintained at 5.82	Minimum 6.0m road setback and streetscape presentation already encroached upon. Greater protrusion of balconies further compromises 'Boulevard' desired character
Increase in the size (depth by 400mm) of the majority of balconies so now protrude to the Joslin Street alignment and reduce setback to east boundary	Increased to meet minimum area for dwelling open-space No encroachment created While high sill windows used in rear south

from 1.6m to 1.2m	elevation for most obvious overlooking, the protruding east and west balconies increase potential overlooking to south-east and south-west. More effort should be made to mitigate potential casual overlooking, eg re-orientate outlook and provide screening to 1.7 metres across/protruding along southern side
Decrease in Greenhill Lane setbacks of Level 2 by 1.61 metres, Level 3 by 1.0 metre to form a single plane elevation and Levels 4 and 6 by 1.0 metre to form a single plane with levels above	Minimal 0.39 metre setback to lane, and rear elevation, was previously relieved by the varied setbacks of the various levels above. A bluff mass 3 storey elevation is presented to the lane and stepped levels above lack articulation (only relieved by contrast colour)
Subsequent changes to all facades to accommodate internal changes and increase levels of natural light and ventilation with additional fenestration	The additional fenestration, canopies, balconies and contrasting materials and colours generally enhance appearance. Apart from rear elevation that is more bluff with lack of setback and articulation The notable building appearance changes, resident amenity and environmental design, eg lack of 'green' design elements, long narrow corridors, lack of passive cross-flow ventilation etc, warrants a re-assessment against policy and by Design Review Panel
Revision of front landscaping layout and addition of extra paths off Greenhill Road and Joslin Street (disabled ramp)	Landscaping is already limited and confined to the front of the site. Area of planting reduced and less trees on eastern entry, albeit number of trees to front and corner with Joslin Street increased. Ground floor plan differs from Landscape plan Diminishes 'Boulevard' desired character
Removal of the level 1 planter box along the Joslin Street facade and changes to the ground floor car park screening material	Environmental treatments already limited (ie retention / detention of water) so loss of only other 'green' element disappointing Opportunity available for 'green' walls and roofs and a positive off-set for otherwise minimal attention to building performance
Maximum building height of 27.7 metres	Unchanged Policy limit of 25.5 metres
Extensive rear building envelope encroachment	Unchanged Unfortunate encroachment on proper and orderly threshold demarcation between zones and future consistent from of development

Council Comments

The following comments are provided by Council for further consideration by DAC in relation to the planning policy implications of the proposed variation:

- The unfortunate original building envelope encroachment beyond the proper and orderly threshold demarcation between zones and compromised setbacks and overlooking are further exacerbated by incremental expansion;

- The minimum 6.0metre Greenhill Road setback, 3.0 metre side boundary setback and therefore 'Boulevard' desired character streetscape presentation is further compromised by greater protrusion of front balconies (to within 3.84 metres) and reduced side setbacks (0.0 to west and from 3.0 to 2.0 metres to east);
- The minimal 0.39 metre setback to Greenhill Lane of the rear elevation, and reduced setbacks of Levels 2, 3, 4 and 6, creates an undesirable bluff mass 3 storey elevation to the rear/lane and a lack of overall articulation;
- The limited and only landscaping area at the front is further reduced due to additional entry paths and lack of trees (eg along eastern boundary), diminishing outcome for 'Boulevard' desired character;
- Overlooking potential is addressed to south, albeit creating bluff elevation without the previous varied setback relief and overall articulation;
- Overlooking potential to the south-east and south-west is exacerbated by larger protruding balconies which should be better mitigated by re-orientation of outlook and screening (to 1.7 metres) to southern side or more of balconies;
- Landscaping and environmental treatments are already limited (retention / detention of water) so the reduction of 'green' elements further compromises policy requirements and is disappointing for such a new large scale development. Significant opportunity is available for 'green' roofs and walls as a positive off-set of otherwise limited attention to building energy performance and amenity for occupants;
- The notable building appearance changes, lack of elevation articulation, occupant amenity and environmental design, eg lack of 'green' design elements, long narrow corridors, lack of passive cross-flow ventilation etc, warrants a re-assessment against policy and by Design Review Panel.

It is trusted these comments will be given further consideration and the issues that have been raised addressed by review of the nature of the proposed variations.

If there are any queries, or opportunity to contribute to the review and/or assessment by DAC, please contact Mr David Brown, Principal Policy Planner on 8372 5185 or dbrown@unley.sa.gov.au

Yours Sincerely



Peter Tsokas
CHIEF EXECUTIVE OFFICER