

Assessment Report

for the Development Report

**Plympton Mixed Use Development
Anzac Highway/Marion Road**

December 2013



Government of
South Australia

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Highway/Marion Road**

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Department of Planning, Transport and Infrastructure

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Executive Summary

On 24 May 2007 a proposal to redevelop the existing Highway Inn Hotel and surrounding land, located on the corner of Anzac Highway and Marion Road at Plympton, for a mixed use commercial and residential development, was declared a Major Development.

The declaration was further varied January 2009 to include one additional property. The total site covers approximately 18,000m² and is zoned Neighbourhood Centre Zone and Residential within the West Torrens (City) Development Plan.

A development application was then lodged by the proponent, the Palmer Group, which the Development Assessment Commission (DAC) considered and determined that a Development Report (DR) was to be prepared by the proponent. Guidelines were set by DAC that showed the issues the proponent needed to address in the DR.

The proponent prepared a DR, which was placed on public exhibition for six weeks from July to August 2009. A public meeting was also held. Twelve submissions were received from the public, the City of West Torrens and relevant Government Agencies. These submissions were provided to the proponent. There existed at that time unresolved traffic and access issues. The proponent subsequently requested that the matter be put on hold to enable the issues raised to be further considered.

The matter remained formally on hold until an amended DR was received by this Department, in January 2013. Following a detailed review and provision of updated traffic data, the amended DR was released for a three week public and agency consultation period from May 2013 to June 2013. Eighteen (18) submissions from the public and state government agencies were received during this period. The proponent then provided a Response Document (RD) in July 2013 in regard to those submissions. The proposal now formally lodged for approval comprises the following main components:

- Construction of 108 apartments of which 26 are serviced apartments. The configuration comprises two freestanding groups (East and West towers) of five levels and one group of apartments (north tower) with six levels of residential above one level of car parking and one level of retail.
- A supermarket of 3086m² and associated storage and administration offices (mezzanine area of 296m²).
- Specialty retail shopping tenancies incorporating cafes and restaurants at ground level (1994m²).
- Internal pedestrian mall.
- Commercial space (office or similar) on Level 1 (878m²).
- Provision of car parking (448 parks total)
- Bicycle racks at street level and bike storage associated with the accommodated storage.
- Service vehicle access via Anzac Highway and exiting via Elizabeth Avenue.
- Service corridors are provided through the building.
- Development is to be constructed in 3 stages

Assessment of the proposal has now been completed and encapsulated in this Assessment Report. This AR describes the project; documents the public, agency and local government submissions; assesses the potential environmental; social and economic impacts; and sets out conclusions and recommendations.

In summary terms this AR concludes:

- The development warrants the granting of provisional development authorisation, subject to reserve matters (requiring further detailed plans and information) being satisfied and compliance with conditions.
- The establishment of the Plympton Mixed Use Development furthers the process of urban renewal through its integrated mixed-use focus. It also revitalises an underutilised site, and

optimises efficient economic service provision, including transport efficiencies on a high frequency public transport route.

- Due to the higher residential densities within the proposed development and its location on major transport routes (bus and tram) it provides tangible evidence of being one of Adelaide's first Transit Oriented Development's (TOD). More specifically, it would provide different accommodation packages including serviced apartments for short term, residential apartments and affordable housing in the form of affordable rental (1 and 2 bedroom apartments). The proposed development provides a focal point for the area, an increase in urban lifestyle facilities including cafés and restaurants which would contribute significantly to economic vitality of the area that is midway between the coast and the CBD.
- The operation of the proposed development would generate a significant amount of traffic on the existing network. Due to the intensification of the site, an increase in traffic would be expected, but the staggered usage due to differing trading hours of the mixed uses could spread demands outside of the arterial peak periods, indicates that potential increases could be managed. More detail in terms of traffic management and interventions is proposed to be the subject of conditions of approval.
- In terms of the provision of public open space/recreational space, this in many respects is governed by the constraints of the site and the housing product available (apartment style living). This proposal will attract those people who will want to live with the types of uses available on site and whose social interaction takes the form of meeting at cafes/restaurants/hotels etc. There is an internal public space in the form of an internal mall and covered outside seating space.
- The interface with adjoining uses has been effectively managed, with the streetscape amenity for Elizabeth Avenue improved further from the original design.

1 INTRODUCTION

1.1 SUMMARY

This Assessment Report (AR), prepared by the Minister for Planning, assesses the environmental, social and economic impacts of a proposal by the proponent, the Palmer Group, to develop a mixed use development (in 3 stages – Refer Section 2.1.4) comprising:

- 108 residential apartments in three towers, including dedicated affordable and serviced apartments
- a supermarket
- retail and commercial uses
- associated car parking over three levels (a basement level, ground level and level 1), including ground level bicycle parking facilities.

In total there are eight levels above ground level in the north-western portion of the site, with a maximum height of 33.4 metres and two freestanding towers in the south-eastern and south-western corners of the site (each with five levels). The proposed development is on land which integrates the existing Highway Hotel on the corner of Anzac Highway and Marion Road at Plympton.

This AR for the proposed Plympton Mixed Use Development - Anzac Highway/Marion Road is intended to be a “stand alone” document. The detailed information on which it is based is contained in the proponent’s Development Report (DR) May 2009, the Amendment to the DR (May 2013), public comments and submissions on the two DRs, and responses to submissions in the proponent’s Response Document (which is reproduced in Appendix 1). This AR also relies on information, comments and advice provided by relevant South Australian Government agencies.

1.2 BACKGROUND

The proponent, the Palmer Group, is a privately owned company that holds a number of high quality commercial investments throughout metropolitan and regional South Australia. The Highway Hotel, located on the corner of Anzac Highway and Marion Road, has been redeveloped by the Palmer Group and in addition to the proposed development is part of the proponent’s vision to revitalise the immediate area.

The proponent believes the provision of new retail facilities would add to the vibrancy of the existing Neighbourhood Centre as a whole. The apartment complex would contribute to intensifying residential density within the West Torrens Council area and the project would be a catalyst for the further development of Anzac Highway as a Transit Orientated corridor.

1.3 ENVIRONMENTAL IMPACT ASSESSMENT (EIA) PROCEDURES

Environmental Impact Assessment (EIA) is a process of identifying the potential environmental, social and economic impacts of a proposal and of identifying appropriate measures that may be taken to minimise any impacts. The main purpose of EIA is to inform decision-makers of the likely effects of a proposal before any decisions are made. EIA also allows the community to make submissions on a proposal. The specific EIA procedures for Major Developments or Projects in South Australia are outlined out in Sections 46 to 48 of the *Development Act 1993* (the Act).

Pursuant to Section 46(1) of the Act, the proposed Plympton Mixed Use Development - Anzac Highway/Marion Road proposal was declared a Major Development on 24 May 2007 by the then Minister for Urban Development and Planning (the Minister). This declaration resulted from the Minister forming the opinion that the proposed development was of major environmental, social or economic importance and that a declaration was appropriate or necessary for the proper assessment of the proposal.

Following the declaration by the Minister, a development application was lodged with the then Department of Planning and Local Government on 2 July 2007. The proposed development described in the application fell within the ambit of the Minister's declaration and was therefore subject to the Major Developments and Projects assessment provisions of the Act referred to above (i.e. the EIA process).

The proponent's development application was subsequently referred to the Development Assessment Commission (DAC) to determine the level of assessment that should apply to the proposed development and to set the Guidelines for an Environmental Impact Statement (EIS), Public Environmental Document (PER) or a Development Document (DR).

After considering the significant issues for the proposal, the DAC determined that a DR was the required level of assessment for the proposed Plympton Mixed Use Development - Anzac Highway/Marion Road proposal and set the Guidelines, which were publicly released on 1 August 2007. Pursuant to Section 46D of the Act, the proponent must comply with the DAC's Guidelines when preparing the DR.

The declaration was subsequently varied on 29 January 2009 to include as part of the site one additional property comprising four strata plans.

The proponent prepared a DR, which was submitted to the Minister on 22 May 2009. The DR was placed on public exhibition for six weeks from 6 July to 14 August 2009. A public meeting was also held on 20 July 2009, convened by the then Department of Planning and Local Government on behalf of the Minister. Twelve submissions were received from the public, the City of West Torrens Council and relevant Government Agencies.

An Amendment to the DR was received by the Department on 17 May 2013. This has been in response to relevant and after Government agency feedback to the proponent to address a number of traffic issues at that site resulting from its location at the corner of Anzac Highway and Marion Road. The Amendment to the DR was released for public consultation on Wednesday 29 May 2013 for three weeks to Wednesday 19 June 2013. Eighteen (18) submissions were received from the public, the City of West Torrens Council and relevant Government Agencies.

The proponent lodged a Response Document with the Minister on 31 July 2013, which contained variations to the proposal aimed at addressing issues raised during consultation. The proponent's Response to Submissions is reproduced in Appendix 1. Pursuant to Section 48B of the Act, the Minister may permit a proponent to vary an application and any associated documents provided the relevant development remains within the ambit of the DR.

Pursuant to Section 46D (8) of the Act, the Minister, in preparing this AR, has taken into account the proponent's DR; the Amendment to the DR; public, Council and Government Agency submissions; the proponent's Response Document to submissions, and other matters that the Minister considered appropriate.

This AR provides advice to the Governor, who is the final decision-maker on the proposed development. Pursuant to Section 48(5) of the Act, when making a decision on the proposed development, the Governor must have regard to the provisions established under that Section. In this regard it is proposed that the Governor have regard to the appropriate City of West Torrens Development Plan and regulations (so far as they are relevant), the Planning Strategy (*the 30 Year Plan for Greater Adelaide (2010)*), the Building Rules, the proponent's DR, Response Document and the Minister's AR and any other matters considered relevant by the Governor. Pursuant to Section 48(7) of the Act, the Governor may also specify any conditions that should be complied with if a development authorisation is granted.

2 THE PROPOSED DEVELOPMENT

2.1 THE SITE

The proposed Plympton Mixed Use Development - Anzac Highway/Marion Road proposal is located on a site bound by Elizabeth Avenue to the south, Anzac Highway to the northwest and Marion Road to the northeast. The site comprises current Certificate of Title References (5104/701, 5104/702, 5104/700, 5490/453, 5457/209, 5104/703, 5374/188, 5427/767, 5077/46, 5560/492, 5486/281, 5043/137, 5043/138, 5043/139 and 5043/140).

Excluding the Highway Hotel, the site has frontages of approximately 94 metres along Anzac Highway, 110 metres along Marion Road and 125 metres along Elizabeth Avenue. The overall site area is approximately 18,000m². The basement level of the car park is located on the boundaries at the southern and south-eastern portion of the site covering an area of approximately 6,300m².

The Highway Hotel is the most prominent development currently operating on the site, with an associated bottle shop. There are two businesses/tenancies not associated with the development that also currently occupy the development site. They are Network Video (on the corner of Elizabeth Avenue/Marion Road) and a Furniture and Antiques dealer, both located on Marion Road. Seven residential dwellings, four of which are strata titled and one vacant allotment were acquired by the proponent to extend the existing site. The remainder of the site is car parking and access. The Palmer Group owns all the buildings and, with the exception of the refurbished Highway Hotel, these would be demolished if the proposal proceeds. There are no state or local heritage places on the site, or significant trees.

The site location plan of the proposed development is included in Appendix 2 of this AR.

2.2 THE LOCALITY

The site is located opposite a neighbourhood shopping precinct to the north that comprises three banking institutions, a laundrette, Indian grocery, a Primo Café, a hairdresser, a dentist, dress shop, Coles supermarket, a newsagency, a post office and chemist. Diagonally opposite the Highway Hotel on the north-eastern corner of the intersection of Anzac Highway and Marion Road is a BP Service Station, with a Hertz Rent-Car on the south eastern corner. Barnacle Bills abuts the bottle shop on Anzac Highway. Surrounding the site to the rear is mainly residential development comprising single and two storied development built from the 1930's onwards. The existing commercial buildings in the immediate locality are generally single storied in height.

Anzac Highway and Marion Road serve as primary access routes through to the City from Glenelg and the south western suburbs.

2.3 DESCRIPTION OF THE PROPOSAL

2.3.1 Overview of the Proposed Development

Specific details of the proposed development are outlined in the proponent's Amendment to the DR.

The proposal for what is currently the Highway Hotel site is a mixed use development with a maximum of eight building levels above ground and one basement level below ground. The proposed development cost is approximately \$40 million. The proposal incorporates the construction of 108 apartments (comprising 26 serviced apartments). The apartment tower configuration comprises two freestanding buildings, being the East and West towers. Both the East and West Towers comprise four levels of apartments above one level of car parking. The North Tower comprises six levels of residential above one level of car parking and one level of retail and is over the balance of the site. The three towers are located

in the east, west and northern sectors. The serviced apartments would be located towards the centre of the development above the two levels that comprise both retail and commercial.

Table 1.

The breakdown of apartments (serviced and non serviced) is as follows:	
Serviced Apartments	<ul style="list-style-type: none"> ▪ 12 (1 bed apartments) ▪ 14 (2 bed apartments)
North Tower	<ul style="list-style-type: none"> ▪ 24 (2 bed apartments) ▪ 18 (3 bed apartments)
East Tower	<ul style="list-style-type: none"> ▪ 16 (2 bed apartments)
West Tower	<ul style="list-style-type: none"> ▪ 24 (2 bed apartments)

- A supermarket of 3086m² and associated storage and administration offices (mezzanine area of 296m²).
- Specialty retail shopping tenancies incorporating cafes and restaurants at ground level (1994m²).
- Internal pedestrian mall.
- Commercial space (office or similar) on Level 1 (878m²).
- Provision of car parking (448 parks total)
- Bicycle racks at street level and bike storage associated with the accommodated storage.
- Service vehicle access via Anzac Highway and exiting via Elizabeth Avenue.
- Service corridors are provided through the building.
- Development to be constructed in 3 stages

2.3.2 Proposed Design

The proposed shopping and residential apartment complex comprises three distinct building envelopes. Ground level comprises the supermarket, retail, and car parking components. The two levels housing the serviced accommodation are located from the edge of the Marion Road side towards the middle of the site (following the east/west boundary). The North Tower, comprising six levels (above retail at ground level and car parking on level one), is located on the north western axis and abuts Anzac Highway on one side and towards the centre of the proposed development on the other. The setback from the North Tower to the nearest residence (in this case the two storey block of flats on Anzac Highway), is approximately 11 metres. The West Tower comprising four levels above a ground level car park, is setback two metres and one metre respectively at its closest south-western and north-western most point from the nearest residence. The East Tower has a four metre setback from Marion Road and approximately 0.75 metre setback from Elizabeth Avenue.

The proposed development (if approved) would be the tallest building in the immediate and broader area, noting that the existing development is mainly two storeys. The height of the development is 33.4 metres.

Within this general building framework, the key elements of the proposal involve:

- Ground floor retail area comprising 17 tenancies
- Commercial area on Level 1 (878m²)
- Apartments located on Levels 1 -4 in the East and West Tower and Levels 2 -7 for the North Tower. Two levels of serviced apartments above the commercial component (Levels 3 and 4). The apartments contain a mix of 1, 2 and 3 bedrooms per apartment.

- 448 car parks, dispersed at street level, basement level and Level 1. Further apartment and serviced apartment car parks are on Level 1 (133 parks). There is also rooftop car parking above the supermarket. Access is via Elizabeth Avenue for West and East Tower parking and Marion Road for North Tower, commercial and basement retail car parking. At grade car parking can be accessed from both Marion Road and Anzac Highway.
- 156 bicycle racks would be provided across three locations adjacent to the ground level car park for visitors.
- Vehicle access to the basement car park would be via ramp access from Marion Road. The basement area would have lift and stair access, fire exits, a ventilation system, plant rooms and water storage.

In general terms, the proponent has indicated that the building materials are to comprise of precast concrete panels, Austen steel and glass. Timber slatted screens and landscaping are to be used to soften any hard edges. The pallet of building materials is not dissimilar to the Highway Hotel.

The proponent aims to achieve the equivalent of a 5 star rating using the Green Building Council of Australia (GBCA) rating tool for the residential component. The DR (Section 4.1.3) states that the retail component is to be assessed against the Green Building Code Australia's Shopping Centre Design Pilot Tool.

2.3.3 Infrastructure Requirements

The proponent has indicated that all required infrastructure services are to be connected to the site, including gas, water, sewer, electricity and communications. For further information see Section 8.1 of this AR and the proponents DR (Section 4.4). All power would be undergrounded to the site.

The DR states that the basement car parking area would incorporate mechanical exhaust ventilation (as shown on the drawings). The kitchen exhausts from the restaurant/café areas would be discharged at roof level in accordance with the relevant standards to ensure that odour dispersion does not create adverse effects.

2.3.4 Staging and Timing

The proponent has proposed that the development proceed in three stages. Stage 1 would have construction commencing in early 2014, with substantial completion of Stage 1 anticipated by the proponent in 2016. Stage 1 would comprise development up to Level 3, the basement car park, the retail area with commercial above, the West and East Tower comprising four levels of apartments and ground level car parking. The Highway Hotel remains, with all other buildings on the site being vacated before demolition would be undertaken. Hotel operations would need to be maintained during construction.

Stage 2 comprises the serviced apartments. Stage 3 comprises the remaining North Tower apartment block. Stages 2 and 3 may be undertaken as one stage.

Staging	
Stage 1 - East and West Towers to be completed by approximately 2016	Basement car park Ground floor supermarket Ground floor retail Commercial West Tower - 24 (2 bed) apartments East Tower - 16 (2 bed) apartments

Stage 2 - completed by approximately 2018	Serviced Apartments above the commercial component 12 (1 bed) apartments 14 (2 bed) apartments
Stage 3 - completed by approximately 2021	North Tower 24 (2 bed) apartments 18 (3 bed) apartments

3 CONFORMITY WITH LEGISLATION AND POLICIES

Section 48(5) of the *Development Act 1993* requires that, before the Governor considers a proposal that has been declared a Major Development, the Governor must have regard to, amongst other things, the provisions of the appropriate Development Plan and the Regulations (so far as they are relevant) and the Planning Strategy. While the Governor must have regard to those matters set out in Section 48(5), the Governor is not bound by the relevant provisions of the appropriate Development Plan or the Planning Strategy when making the decision.

The Crown Solicitor has advised that in respect of applications being assessed as Major Developments under the Act, the appropriate Development Plan and Planning Strategy are those current at the time of the decision, (as Section 53 of the Act does not apply to the Major Development provisions).

3.1 DEVELOPMENT PLAN

The relevant Development Plan is the *West Torrens (City) Development Plan Consolidated – 22 November 2012*. The subject land is located within the *Neighbourhood Centre Zone*, as identified in *Map WeTo/12* and *WeTo/15* of the Development Plan. The site also includes a small portion of Elizabeth Avenue that is contained within the *Residential Zone*. The policy areas are identified as *Policy Area 16 Plympton* and *Residential Policy Area 21*.

The following Zone and General Section provisions of the Development Plan are considered relevant:-

General Section

Centres and Retail Development

Objective: Shopping, administrative, cultural, community, entertainment, educational, religious and recreational facilities located in integrated centres.

Objective 2: Centres that ensure rational, economic and convenient provision of goods and services and provide:

- (a) a focus for community life
- (b) safe, permeable, pleasant and accessible walking and cycling networks.

Objective 3: The provision of a safe pedestrian environment within centres which gives high priority to pedestrians, public and community transport.

Objective 4: Increased vitality and activity in centres through the introduction and integration of housing.

Objective 5: Centres developed in accordance with a hierarchy based on function, so that each type of centre provides a proportion of the total requirement of goods and services commensurate with its role.

Objective 6: The central business district of the City of Adelaide providing the principal focus for the economic, social and political life of Greater Adelaide and the State.

Principles of Development Control

PDC 1: Development within centres should:

- (a) integrate facilities within the zone
- (b) allow for the multiple use of facilities and the sharing of utility spaces
- (c) allow for the staging of development within the centre
- (d) be integrated with public and community transport.

PDC 2: Development within centres should be designed to be compatible with adjoining areas. This should be promoted through landscaping, screen walls, centre orientation, location of access ways, buffer strips and transitional use areas.

PDC 3: Development within centres should provide:

- (a) public spaces such as malls, plazas and courtyards
- (b) street furniture, including lighting, signs, litter bins, seats and bollards, that is sited and designed to complement the desired character
- (c) unobtrusive facilities for the storage and removal of waste materials

- (d) public facilities including toilets, infant changing facilities for parents, seating, litter bins, telephones and community information boards
- (e) access for public and community transport and sheltered waiting areas for passengers
- (f) lighting for pedestrian paths, buildings and associated areas
- (g) a single landscaping theme
- (h) safe and secure bicycle parking.

Arterial Roads

PDC 7: Centres should develop on one side of an arterial road or in one quadrant of an arterial road intersection.

PDC 8: Centre development straddling an arterial road should:

- (a) concentrate on one side of the arterial road or one quadrant of the arterial road intersection
- (b) minimise the need for pedestrian and vehicular movement from one part of the centre to another across the arterial road.

Retail Development

PDC 9: A shop or group of shops with a gross leasable area of greater than 250 square metres should be located within a centre zone.

Analysis

The proposed development would provide for a mix of retail, commercial and residential land uses on a site in a prominent location at the intersection of Anzac Highway and Marion Road. The delineation of the Neighbourhood Centre Zone in this particular area occurs to the northwest, south and south east of the intersection that comprises two arterial roads. The proposed development has the advantage of being easily accessible to the City or Glenelg for work/leisure as it is the midpoint between the two destinations. There is direct and easy access to both the tram and bus stops on either side of the site.

The potential for residential development in this case has the added advantage of providing for both long term residential stay and serviced apartments that are suitable for short term/tourist stay, and also affordable housing in the form of rental affordable housing. The apartments range in size from 68m² to 112m² providing for a range of living and family types.

Employment opportunities are also provided through the increase of both the retail and commercial development on the site. Further services would be provided to the community through a more diverse mix of retail provided at a more localised level, without the need for further travel for shopping needs. The proposed development would improve the existing Neighbourhood Shopping Centre through the provision of retail facilities that respond to local demand, including the enhanced café/restaurant experience that is currently unavailable. It is also to be expected that there would be a level of economic impact on the existing centre located in Plympton, in the initial commencement of the proposed shopping centre but this would equalize out over a period of time.

There is no defined sheltered waiting area for passengers, who use community buses. This in part could be due to the accessibility and integration of the proposed development to existing public transport, the bus and the tram.

PDC 8 speaks of minimising the need for increased pedestrian and vehicular movement from one centre to another. However, pedestrian traffic is likely to increase between the proposed shopping centre and the adjacent shopping centre directly opposite on Anzac Highway.

The rear of the site would be used for the service/delivery vehicles for loading and unloading. Landscaping is indicated on the plans/perspective, which would benefit from further detail in advance of actual plantings to maximize the effect. The design of the development is such that it provides adequate coverage against inclement weather along the retail frontages and the entrances to the apartment towers.

This AR concludes that the proposed development satisfies the above provisions on a number of levels. It is located on two major designated transport routes with the choice of public transport options, offers short term stay/tourist accommodation as well as residential units, provides employment opportunities and provides retail diversity to its catchment area. The site is suitable for its intended use. Public facilities and spaces (the mall) are an essential part of the design and would be fitted out accordingly. Whilst staging the development is supported in the General Section, the staging of the construction would impact on the surrounding area as well as the day to day operation of the development itself and accordingly would need to be carefully managed. There would also be potential impacts due to the increase in the volume of traffic as a result of the development and these are discussed further in this AR.

General Section

Appearance of Land and Buildings and Set-backs

PDC 4: A single architectural theme should be established within centres through:

- (a) constructing additions or other buildings in a style complementary to the existing shopping complex
- (b) renovating the existing shopping complex to complement new additions and other buildings within the centre
- (c) employing a signage theme.

PDC 5: The design of undercroft or semi-basement car parking areas should not detract from the visual quality and amenity of adjacent pedestrian paths, streets or public spaces.

PDC 6: Undercroft or semi-basement car parking areas should not project above natural or finished ground level by more than 1 metre.

Design and Appearance

Objective 1: Development of a high architectural standard that responds to and reinforces positive aspects of the local environment and built form.

Objective 2: Roads, open spaces, buildings and land uses laid out and linked so that they are easy to understand and navigate.

Principles of Development Control

PDC 1: The design of a building may be of a contemporary nature and exhibit an innovative style provided the overall form is sympathetic to the scale of development in the locality and with the context of its setting with regard to shape, size, materials and colour.

PDC 2: Buildings should be designed and sited to avoid creating extensive areas of uninterrupted walling facing areas exposed to public view.

PDC 3: Buildings should be designed to reduce their visual bulk and provide visual interest through design elements such as:

- (a) articulation
- (b) colour and detailing
- (c) vertical and horizontal components
- (d) design and placing of windows
- (e) variations to facades.

PDC 4: Where a building is sited on or close to a side boundary, the side boundary wall should be sited and limited in length and height to minimise:

- (a) the visual impact of the building as viewed from adjoining properties
- (b) overshadowing of adjoining properties and allow adequate sun light to neighbouring buildings.

PDC 5: The external walls and roofs of buildings should not incorporate highly reflective materials which would result in glare to neighbouring properties or drivers.

PDC 6: Structures located on the roofs of buildings to house plant and equipment should form an integral part of the building design in relation to external finishes, shaping and colours and be screened from public view.

PDC 7: Building design should emphasise pedestrian entry points to provide perceptible and direct access from public street frontages and vehicle parking areas.

PDC 8: Development should provide clearly recognisable links to adjoining areas and facilities.

PDC 9: Buildings, landscaping, paving and signage should have a co-ordinated appearance that maintains and enhances the visual attractiveness of the locality.

PDC 10: Buildings (other than ancillary buildings or group dwellings) should be designed so that their main façade faces the primary street frontage of the land on which they are situated.

PDC 11: Where applicable, development should incorporate verandas over footpaths to enhance the quality of the pedestrian environment.

PDC 12: Development should be designed and sited so that outdoor storage, loading and service areas are screened from public view by an appropriate combination of built form, solid fencing and/or landscaping.

PDC 13: Outdoor lighting should not result in light spillage on adjacent land.

PDC 14: Balconies should:

- (a) be integrated with the overall architectural form and detail of the building
- (b) be sited to face predominantly north, east or west to provide solar access
- (c) have a minimum area of 2 square metres.

PDC 15: Vehicle parking areas provided in a deck arrangement within buildings should be designed, sited and screened from public view by an appropriate combination of built form, landscaping and/or visual art while still allowing for natural ventilation within these structures.

Building Setbacks from Road Boundaries

PDC 16: The setback of buildings from public roads should:

- (a) be similar to, or compatible with, setbacks of buildings on adjoining land and other buildings in the locality
- (b) contribute positively to the streetscape character of the locality
- (c) not result in or contribute to a detrimental impact upon the function, appearance or character of the locality.

PDC 17: Non-residential buildings and structures should be set back from side or rear boundaries with the residential zone:

- (a) a minimum of 3 metres where the vertical wall height (from natural ground level) is 4 metres or less
- (b) plus an additional 0.6 metres for every metre the vertical wall height (from natural ground level) exceeds 4 metres.

PDC 18: Development likely to encroach within a road widening setback under the *Metropolitan Adelaide Road Widening Plan Act 1972* should be set back sufficiently from the boundary required for road widening.

Analysis

The proposed development would create a significant built form in a prominent location (at the intersection of two major arterial roads, Anzac Highway and Marion Road). The height of the complex would mean that the development would be a landmark. The proposed development is built to the perimeters of the site and the positioning of the apartment towers is such that the height is towards the north western part of the site, away from the surrounding residences by a setback of 15 metres. The setbacks for the site are not dissimilar to existing retail development on Anzac Highway. The front setback for the West Tower is in keeping with the adjoining residential development. The setback to a residential building at the rear and side from the West Tower (which is five storeys high), is between one and two metres at the closest point to the boundary of a residence. Whilst the development is relatively close to the boundary and closer than that provided for in the relevant Development Plan provisions, there is a positive aspect to the West Tower being in that position, as it provides a barrier to the service and delivery area for the mitigation of noise, odour and dust providing a level of amenity for the adjacent residential development.

The architectural design is quite contemporary and integrates well with the existing Highway Hotel, which was refurbished several years ago. The proposed development addresses the corner site, providing a

focal point. The amendment shows sufficient articulation in the fragmentary quality of the larger North Tower, the West and East Towers as well as the two levels of apartments above the commercial area to achieve a graded change between existing and new developments than there was previously. The separate roofs of the towers provide visual interest within the skyline, as viewed further afield, from and approaching the site. The diversity of materials also creates additional interest (i.e. the timber louvres and the glass to void ratio, metal panels (composite), stone facings, Austen steel and precast concrete panels).

The proposed street frontages for Marion Road and Anzac Highway are articulated sufficiently to invite pedestrian interest. The design includes canopies along the internal frontages to provide a full width pedestrian shelter with canopies to the entrances on the apartment towers on Elizabeth Avenue. Some colour relief at street level and articulation at the upper level has been provided to wall of the proposed the supermarket on Elizabeth Avenue to offset the expansiveness. The car parking has been screened from public view through landscaping comprising green walls, perimeter landscaping and landscaping within the car park itself.

The proposed development exceeds the height specified in the West Torrens (City) Development Plan Overlay Map WeTo/12 Development Constraints by 18.4 metres. The building is taller than other buildings in the immediate locality and further afield. It would be the first building of its kind in the immediate locality so would be visually prominent. The proposal was referred to the Federal Airports Corporation as the height proposed is over 15 metres (the total height being 33.4 metres). The proposed height does not affect the maintenance of the long-term operational, safety and commercial aviation requirements of the Adelaide International Airport.

This AR concludes that the proposed development does not meet all of the provisions for height and setbacks. However, whilst the buildings would rise above nearby existing buildings, the perceived height is not prominent at a pedestrian level. Collectively the heights of all the buildings on the site range from 5.5 metres, 9.1 metres and 19 metres (the two stand alone towers) through to 33.4 metres (the North Tower). Visually when viewed from any direction there would be a variety of heights and massing. The transition of the built form through to the existing residential component is acceptable. The setbacks to the larger tower component and its positioning towards Anzac Highway lessen the visual impact. The setback from the 8 storey component encompasses the proposed service road on the north western side adjacent Barnacle Bills and next to that a 3 storey residential flat building. The higher built form has the ability to accommodate a range of uses, higher living densities and the potential to create lower energy demands due to its overall footprint. The car parking facilities are integrated sufficiently into the overall design.

A strip of land up to 4.5 metres may be required for The Metropolitan Road Widening Plan from both Anzac Highway and Marion Road frontages. A corner cut-off is also required at the Marion Road/ Elizabeth Avenue corner of the site. The proponent is aware that the consent of the Commissioner of Highways is required for building works located on or within 6 metres of the requirements.

General Section

Interface between land uses

Objective 1: Development located and designed to prevent adverse impact and conflict between land uses.

Objective 2: Protect community health and amenity and support the operation of all desired land uses.

Principles of Development Control

PDC 1: Development should not detrimentally affect the amenity of the locality or cause unreasonable interference through any of the following:

- (a) the emission of effluent, odour, smoke, fumes, dust or other airborne pollutants
- (b) noise
- (c) vibration
- (d) electrical interference

- (e) light spill
- (f) glare
- (g) hours of operation
- (h) traffic impacts.

PDC 2: Development should be sited and designed to minimise negative impact on existing and potential future land uses considered appropriate in the locality.

PDC 3: Any building or structure within a non-residential zone should be set back a minimum of 5 metres from the front property boundary where adjacent to a **Residential Zone**.

PDC 4: Development adjacent to a **Residential Zone** should be designed to minimise overlooking and overshadowing of nearby residential properties.

PDC 5: Residential development adjacent to non-residential zones and land uses should be located, designed and/or sited to protect residents from potential adverse impacts from non-residential activities.

PDC 6: Sensitive uses likely to conflict with the continuation of lawfully existing developments and land uses considered appropriate for the zone should not be developed or should be designed to minimise negative impacts.

Noise

PDC 7: Development should be sited, designed and constructed to minimise negative impacts of noise and to avoid unreasonable interference.

PDC 8: Development should be consistent with the relevant provisions in the current *Environment Protection (Noise) Policy*.

Residential Noise

PDC 42: Residential development close to high noise sources (e.g. major roads, railway lines, tram lines, industry, and airports) should be designed to locate bedrooms, living rooms and private open spaces away from those noise sources, or protect these areas with appropriate noise attenuation measures.

PDC 44: The number of dwellings sharing a common internal pedestrian entry within a residential flat building should be minimised to limit noise generation in internal access ways.

PDC 45: External noise and light intrusion to bedrooms should be minimised by separating or shielding these rooms from:

- (a) active communal recreation areas, parking areas and vehicle access ways
- (b) service equipment areas and fixed noise sources on the same or adjacent sites.

Analysis

The DR (Section 4.2.) indicates that there is not expected to be any adverse noise effects from aircraft noise. The site is located close to flight paths, but falls outside the Australian Noise Exposure forecast (ANEF) System (a method for predicting exposure to aircraft noise). Thus, the apartment component requires no special treatment in regard to aircraft noise.

In terms of land use compatibility regarding noise, the shopping mall and services area are enclosed. The boundary wall would be constructed of a three metre high concrete tilt-up slab and provides a wall on the western boundary for the driveway section adjacent Barnacle Bills takeaway food restaurant and through to the fully enclosed service court. However, the balance is now flanked by the West Tower. As per the DR and RD, outdoor dining would not create noise above the background traffic noise. Plant and mechanical equipment would be enclosed and any noise would be mitigated through the use of noise attenuating design measures.

The Highway Hotel has operated on the on the site for a number of years and is sufficiently located away from the residential area, adjacent the intersection. The proposed development would create a further barrier between the hotel and the residential zone. To manage the night amenity between the proposed residential use (the apartment) and the hotel, the DR (Section 4.1.4) and the RD (Section 3.5.2) propose security personnel and after hours video surveillance for the at grade car park. Signage reminding people to respect the neighbours is also suggested.

The commercial activities on level one would be office related and as such the hours of operation would likely be between 8.00am to 6.00pm weekdays (and maybe Saturdays dependent on tenants). The DR (Section 4.2.) states the apartment component would comprise treatments that achieve a high level of noise attenuation to allow for low level internal noise. The Amendment to the DR (Section 3.4.3) reiterates further that external walls and windows (including double glazing), would be designed and constructed to ensure the accommodation units enjoy a “residential quality amenity”.

As well as the service area being enclosed, a roller door encloses the Elizabeth Avenue exit which would further mitigate noise as well. The RD states the deliveries and servicing the site would comply with the Environment Protection Authority (EPA) requirements. With access to the site from Elizabeth Avenue, there could be potential noise impacts from increased traffic generation in the area. Elizabeth Avenue is however, identified as a secondary road (in the Development Plan), so increased vehicle movement could be expected in any event.

Odours would be mechanically ventilated away from the accommodation component and from adjacent residences. The proponent accepts that it would need to comply with *National Environment Protection (Air Quality) Measures 1998*. The basement car park would have fixed open ventilation with supplementary ventilation required if natural ventilation is insufficient to meet the *Australian Standard AS 1668*. Café ventilation would need to meet that standard also.

This AR is satisfied the proposed development can satisfy the noise and odour provisions. See section above in relation to the built form.

General Section

Transportation and access

Objective 2: Development that:

- (a) provides safe and efficient movement for all motorised and non-motorised transport modes
- (b) ensures access for vehicles including emergency services, public infrastructure maintenance and commercial vehicles
- (c) provides off street parking
- (d) is appropriately located so that it supports and makes best use of existing transport facilities and networks.

Land Use

Principles of Development Control

PDC 1: Land uses arranged to support the efficient provision of sustainable transport networks and encourage their use.

Movement Systems

PDC 2: Development should be integrated with existing transport networks, particularly major rail and road corridors as shown on *Location Maps* and *Overlay Maps - Transport*, and designed to minimise its potential impact on the functional performance of the transport networks.

PDC 5: Land uses that generate large numbers of visitors such as shopping centres and areas, places of employment, schools, hospitals and medium to high density residential uses should be located so that they can be serviced by existing transport networks and encourage walking and cycling.

PDC 6: Development generating high levels of traffic, such as schools, shopping centres and other retail areas, entertainment and sporting facilities, should incorporate passenger pick-up and set down areas. The design of such areas should ensure interference to existing traffic is minimised and give priority to pedestrians, cyclists and public and community transport users.

PDC 8: Development should provide safe and convenient access for all anticipated modes of transport including cycling, walking, public and community transport, and motor vehicles.

PDC 9: Development at intersections, pedestrian and cycle crossings, and crossovers to allotments should maintain or enhance sightlines for motorists, cyclists and pedestrians to ensure safety for all road users and pedestrians.

PDC 10: Driveway cross-overs affecting pedestrian footpaths should maintain the level of the footpath.

PDC 11: Development should minimise commercial and industrial vehicle movements through residential streets and adjacent other sensitive land uses such as schools.

PDC 12: Industrial/commercial vehicle movements should be separated from passenger vehicle car parking areas.

PDC 13: Development should make sufficient provision on site for the loading, unloading and turning of all traffic likely to be generated.

Analysis

Both Anzac Highway and Marion Road are already congested at peak times and the traffic generated from the proposed development would add to that congestion. Objective 2 and PDC 1 speak about a compatible arrangement between land uses and the transport system which ensure major traffic generating developments are located along key existing transport routes and nodes, which this does.

The proposed development would result in an increase in traffic generation overall, which has been further considered in the Amendment to the DR (Section 2.4).

At peak times there would be delays with the use of the right hand turn lane on Marion Road into Elizabeth Avenue. This would be heightened by the overlap from the proposed development and the hotel during peak periods. The DR (Appendix C, Section 9), concludes that the intersection of Anzac Highway/Marion Road is already operating beyond capacity at peak times with long queues and delays. This issue requires ongoing monitoring and is already part of DPTI's ongoing role in managing metropolitan traffic movement.

Both the DR and the RD address a number of issues raised by agency and public submissions. Those issues were the car park design (including the stacking loop) and manoeuvring of service vehicles on site, which also included the access through Elizabeth Avenue. Further modelling (AIMSUN) was also undertaken in relation to the traffic volumes and distribution using a base case option of traffic calibration projected for the year 2016. The RD acknowledges there are queue build ups on the approaches to both Anzac Highway and Marion Road but they dissipate quickly once gaps occur in the traffic. There is further delay in the afternoon from right turning into Marion Road, also from Anzac Highway into Cross Road and delayed movement from Cross Road approach to Marion Road. There were minimal delays for vehicles using Elizabeth Avenue with little impact onto Marion Road. Given the modelling outcomes done by the proponent the operation of the junctions was considered satisfactory by the Department for Planning Transport, Energy and Infrastructure (DPTI).

The access aisles from Marion Road have been lengthened to accommodate potential queuing and the stacked looping has been removed. The service vehicle movement is located to the rear of the development and has directed access from Anzac Highway through to Elizabeth Avenue, separating service/delivery vehicle movements from passenger vehicle car parking areas (as supported by PDC 12). The proposal makes sufficient provision on site for the loading, unloading and turning of all traffic likely to be generated, excepting delivery/service vehicles which are directed through a one way service route to the north western side of the site. The pedestrian crossing point on Elizabeth Avenue, where the service vehicles leave and where access is provided to the car park for the West Tower, is quite wide. However, there is provision at the halfway point to facilitate ease of pedestrian access.

The bus stops appear adequate for both Anzac Highway and Marion Road. However, buses needing to access the right-hand lane from Marion Road into Anzac Highway through to the city may have some difficulty moving across the traffic into the correct lane at peak times. The Taxi zone is to be relocated depending upon the final access location to the site on Anzac Highway.

This AR concludes that the stacking area between the Marion Road entry and basement car park has improved with the revised design. There is sufficient provision on the site for loading and unloading and access through the site for service delivery vehicles. DPTI supports the relocation of the bus stop further south on Anzac Highway.

General Section

Cycling and Walking

PDC 15: Development should ensure that a permeable street and path network is established that encourages walking and cycling through the provision of safe, convenient and attractive routes with connections to adjoining streets, paths, open spaces, schools, public and community transport stops and activity centres.

PDC 18: New developments should give priority to and not compromise existing designated bicycle routes.

PDC 20: Developments should encourage and facilitate cycling as a mode of transport by incorporating end-of journey facilities including:

- (a) showers, changing facilities, and secure lockers
- (b) signage indicating the location of bicycle facilities
- (c) secure bicycle parking facilities.

PDC 21: Pedestrian facilities and networks should be designed and provided in accordance with relevant provisions of the *Australian Standards and Austroads Guide to Traffic Engineering Practice Part 13*.

PDC 22: Cycling facilities and networks should be designed and provided in accordance with the relevant provisions of the *Australian Standards and Austroads Guide to Traffic Engineering Practice Part 14*.

Analysis

The proposal provides 156 bicycle parks for visitor/employee use (as residents have other opportunities to store bicycles) at a number of locations within the site, including the Marion Road side, near the proposed bottle shop off Anzac Highway, near the entry of the apartment building, within the basement area, near the hotel and near the offices. The Development Plan has no provision for the number of on-site bicycle parks. The revised development has been guided by the *Planning SA Bulletin (2001) 'Parking Rates for Selected Land Uses' (Suburban Metropolitan Adelaide)* (refer to Section 3.4.7 Response Report). Overall this AR concludes the amount of bicycle parking is sufficient.

The Westside Bikeway is 800 metres north of the site along a disused railway corridor. The DR (Appendix C, Section 2.9) states that this can be accessed on the western side of Anzac Highway via the pedestrian crossing. The identified Glenelg Park Tramway would provide an off road bicycle link to the City and Glenelg. Both bike routes would be easily accessible from the site.

The site is within easy walking distance to other shopping facilities across the opposite side of Anzac Highway. The external car park has been amended to incorporate direct paths for cyclists and pedestrians. However, crossing points should be reinforced to highlight the presence of cyclists and pedestrians. Pedestrian movement would increase across both Anzac Highway and Marion Road. Pedestrian access surrounding the site is via existing footpaths and through the site via a promenade. The RD shows wombat crossings linking the Highway Hotel, the promenade and the Marion Road access point to create a permeable path through the site.

This AR concludes that the 156 bicycle parks provided is an improvement on the 56 provided previously. Pedestrian access is adequate. It is noted that there is no mall entrance from Elizabeth Avenue. There are safe and convenient links to the bus stops on Anzac Highway and Marion Road and again further southward to the tram. There are existing signalized pedestrian crossings to facilitate negotiating the busy intersection. The proponent states in the Amendment to the DR that directional signage to public transport facilities would be provided.

Access

PDC 23: Development should have direct access from an all weather public road.

PDC 24: Development should be provided with safe and convenient access which:

- (a) avoids unreasonable interference with the flow of traffic on adjoining roads
- (b) provides appropriate separation distances from existing roads or level crossings
- (c) accommodates the type and volume of traffic likely to be generated by the development or land use and minimises induced traffic through over-provision
- (d) is sited and designed to minimise any adverse impacts on the occupants of and visitors to neighbouring properties.

PDC 26: The number of vehicle access points onto arterial roads shown on *Overlay Maps - Transport* should be minimised, and where possible access points should be:

- (a) limited to local roads
- (b) shared between developments.

PDC 27: The number of access points for cyclists and pedestrians onto all adjoining roads should be maximised.

PDC 28: Development with access from arterial roads or roads as shown on *Overlay Maps - Transport* should be sited to avoid the need for vehicles to reverse on to or from the road.

PDC 29: Driveways, access tracks and parking areas should be designed and constructed to:

- (a) follow the natural contours of the land
- (b) minimise excavation and/or fill
- (c) minimise the potential for erosion from runoff
- (e) be consistent with Australian Standard AS 2890 Parking facilities.

Access for People with Disabilities

PDC 31: Development should be sited and designed to provide convenient access for people with a disability.

Analysis

The car park has been redesigned with access points remaining as they are currently, that is left-in /left-out from Anzac Highway and left-in from Marion Road. Residential traffic to the apartments has also been separated from the shopping complex car parking. Elizabeth Avenue is notated as a secondary road in the Overlay Map WeTo/15 Transport which presumes a certain level of vehicle movement. Access to the East Tower car park is via the first level car park entrance from Elizabeth Avenue. The vehicle movement into the East Tower car park appears somewhat awkward, with an internal right turn-in and left turn-out on the through ramp to the first level. The right turn-in has the potential to cause queuing without appropriate management. The West Tower has its own separate ingress/egress also from Elizabeth Avenue. Access to the bottle shop is sufficient.

Access to the proposed development is divided between the service area, accommodation and retail. Access to the serviced apartments is via Elizabeth Avenue. Service vehicles enter from Anzac Highway and exit the site via Elizabeth Avenue through to Marion Road. The impact of traffic generated from the apartments and the delivery/service vehicles would be distributed to Elizabeth Avenue and then Marion Road through to Anzac Highway and Cross Roads. It is proposed in the RD (Section 4) to close the median gap at the junction of Mabel Street and Marion Road post completion of the development.

The DR (Appendix C, Section 6.3.2) proposes widening the kerb and increasing the radius on the left turn-out of Elizabeth Avenue to allow greater maneuverability for service vehicles and semis trailers. The service exit to the loading facility is dedicated to commercial vehicles only, to remove any potential conflicts between residential vehicles and commercial vehicles. A gate will be provided to screen the driveway from Elizabeth Avenue.

Service vehicles of up to 14 metres (semi-trailers) are able to negotiate the site adequately. Whilst a 14 metre service vehicle can safely move through the site and may be appropriate, advice from DTEI indicates that a 14.9 metre through to 19 metre semi trailer is the norm. However, 19 metre articulated vehicles usually service larger supermarkets (as it is more cost effect from a transportation stand point) and the proponent believes there is not likely to be the need for 19 metre general access vehicles (refer to RD Section 4). The left in access only from Marion Road is acceptable.

The AR concludes that the access is adequate considering the constraints of the site. This includes convenient access for people with disabilities.

Vehicle Parking

PDC 33: Development should provide off-street vehicle parking and specifically marked disabled car parking places to meet anticipated demand in accordance with [Table WeTo/2 - Off Street Vehicle Parking Requirements](#).

PDC 34: Development should be consistent with *Australian Standard AS 2890 Parking facilities*.

PDC 35: Vehicle parking areas should be sited and designed in a manner that would:

- (a) facilitate safe and convenient pedestrian linkages to the development and areas of significant activity or interest in the vicinity of the development
- (b) include safe pedestrian and bicycle linkages that complement the overall pedestrian and cycling network
- (c) not inhibit safe and convenient traffic circulation
- (d) result in minimal conflict between customer and service vehicles
- (e) avoid the necessity to use public roads when moving from one part of a parking area to another
- (f) minimise the number of vehicle access points to public roads
- (g) avoid the necessity for backing onto public roads
- (h) where reasonably possible, provide the opportunity for shared use of car parking and integration of car parking areas with adjoining development to reduce the total extent of vehicle parking areas and the requirement for access points
- (i) not dominate the character and appearance of a site when viewed from public roads and spaces
- (j) provide landscaping that would shade and enhance the appearance of the vehicle parking areas.

PDC 36: Vehicle parking areas should be designed to reduce opportunities for crime by:

- (a) maximising the potential for passive surveillance by ensuring they can be overlooked from nearby buildings and roads
- (b) incorporating walls and landscaping that do not obscure vehicles or provide potential hiding places
- (c) being appropriately lit
- (d) having clearly visible walkways.

PDC 37: Where parking areas are not obviously visible or navigated, signs indicating the location and availability of vehicle parking spaces associated with businesses should be displayed at locations readily visible to customers.

PDC 38: Parking areas that are likely to be used during non-daylight hours should provide floodlit entrance and exit points and site lighting directed and shaded in a manner that would not cause nuisance to adjacent properties or users of the car park.

PDC 39: Parking areas should be sealed or paved in order to minimise dust and mud nuisance.

PDC 40: To assist with stormwater detention and reduce heat loads in summer, vehicle parking areas should include soft (living) landscaping.

PDC 41: Parking areas should be line-marked to indicate parking bays, movement aisles and direction of traffic flow.

General Section
Residential
Undercroft Garaging of Vehicles

PDC 52: Undercroft garaging of vehicles should occur only where:

- (a) the overall height and bulk of the development does not adversely impact on streetscape character or the amenity of adjacent properties
- (b) vehicles can safely exit from the site without compromising pedestrian safety or causing conflict with other vehicles
- (c) driveway gradients provide for safe and functional entry and exit
- (d) driveways and adjacent walls, fencing and landscaping are designed to provide adequate sightlines from vehicles to pedestrians using the adjacent footpath
- (e) openings into undercroft garage areas are designed to integrate with the main building so as to minimise visual impact
- (f) landscaping, mounding and/or fencing is incorporated to improve its presentation to the street and to adjacent properties
- (g) the overall streetscape character of the locality is not adversely impaired (eg visual impact, building bulk, front setbacks relative to adjacent development).

PDC 53: Buildings with four storeys or more above natural surface level should include provision for undercroft parking.

PDC 54: Semi-basement or undercroft car parking should be suitably integrated with building form.

PDC 55: In the case of semi-basement car parks where cars are visible, adequate screening and landscaping should be provided.

Analysis

The proposed development offers convenient and safe parking within the site and easy pedestrian access through the site. On-site car parking is provided at basement level, ground level (external car park and residential car park for the East and West Towers) and Level 1 of the proposed development. There is also rooftop car parking above the supermarket. The provisions for car parking are 145 spaces at grade and 170 in the basement car park. The first level has 133 car spaces (which include car parking for the North Tower, the West Tower has 22 car spaces and east tower has 14 spaces with all car parking areas including disabled car parking. This makes a total of 448 car parking spaces.

The Development Plan does not have prescribed car parking standards for this type of development. Using only the available Development Plan calculations and information provided by the original Traffic Impact Statement (DR Appendix C) it would seem that approximately 514 car parks would nominally be required at peak Saturday shopping times.

The Revised Traffic Assessment calculated car parking numbers using a 20% discount rate based on the proposed development having a TOD focus. The car parking rate already assumes less owner vehicles at 1 per dwelling and less for serviced apartments. The car parking has been assessed on the proposal having 24% serviced apartments and 76% residential. Tourists from interstate seeking serviced apartments potentially could also travel by their own vehicle, which is not directly accounted for.

Conversely, the proposed development may result in some reduced car use with tourists using the public transport options for sightseeing and day trips. With the more residential component, some “journey to work” type trips may result in a possible further reduction. The underpinning focus of the proposed development is its TOD potential and the encouragement for users of the site to be less car dependent.

On balance, given the excellent access to public transport, it is reasonable to conclude a lesser parking rate is acceptable, particularly as peak usage time for the retailing component would vary from those of the adjacent hotel. The revised figures in the Amendment to the DR (Section 3.3) show that the provision of 448 spaces is appropriate.

The proposed development is close to transport facilities. Disabled car parking is adequate and would be as per the Building Code.

Vehicle manoeuvring has been contained within in the car park area and does not require the use of reversing onto public roads. There is no on street parking due to the proximity of the major intersection. Separate car parking has been provided for the apartment components. Landscaping is indicated within the car parking area but no Landscape Plan has been provided specifying the detail.

This AR concludes that the car parking provided within the development is adequate. However, there is the possibility of a shortfall of car parking, dependent on any overlap occurring between the periods of operation for both the Hotel and shopping centre.

General Section

Orderly and Sustainable Development

Objective 1: Orderly and economical *development* that creates a safe, convenient and pleasant environment in which to live.

Objective 2: Development occurring in an orderly sequence and in a compact form to enable the efficient provision of services and facilities.

Objective 3: Development that does not jeopardise the continuance of adjoining authorised land uses.

Objective 4: Development that does not prejudice the achievement of the provisions of the Development Plan.

Objective 5: Urban development located only in zones designated for such development.

PDC 1: Development should not prejudice the development of a zone for its intended purpose.

PDC 3: Urban development should form a compact extension to an existing built-up area.

PDC 5: Development should be located and staged to achieve the economical provision of public services and infrastructure, and to maximise the use of existing services and infrastructure.

PDC 6: Where development is expected to impact upon the existing infrastructure network (including the transport network), development should demonstrate how the undue effect would be addressed.

PDC 7: Vacant or underutilised land should be developed in an efficient and co-ordinated manner to not prejudice the orderly development of adjacent land.

PDC 8: Development should be undertaken in accordance with the following concept plan maps:

[Concept Plan Map WeTo/25 Plympton neighbourhood Centre](#)

Analysis

The staging is sequential in that it is proposed to be developed in an efficient and co-ordinated manner so as the continuance of retail services would be ongoing and the adjacent land uses not jeopardised (refer Amendment to the Report Section 2.9). The above provisions also encourage consolidation of the site to facilitate increased density in appropriate locations adjacent an arterial road. In this case, to maximise the full use of the site the proponent has increased the building envelope vertically.

The DR (Section 4.4.1) indicates that provision of public services is not problematic. **This AR concludes that there are existing services at the site and any new connections/augmentation would be available from the immediate locality.**

General Section

Residential Development

Objective 1 Safe, convenient, pleasant and healthy-living environments that meet the full range of needs and preferences of the community.

Objective 2 An increased mix in the range and number of dwelling types available within urban boundaries to cater for changing demographics, particularly smaller household sizes and supported accommodation.

Objective 3 Higher dwelling densities in areas close to centres, public and community transport and public open spaces.

Objective 4 The regeneration of selected areas identified at zone and/or policy area levels.

Objective 5 Affordable housing and housing for aged persons provided in appropriate locations.

PDC 4: Dwellings constituting affordable housing should be located to optimise access to shops, social services and facilities, or public transport.

PDC 6: High density development that achieves gross densities of more than 45 dwellings per hectare (which translates to net densities of more than 67 dwellings per hectare) should typically be in the form of over four storey buildings.

Analysis

The reconfiguration of the amended proposal has meant a reduction in the number of apartments from 120 to 108. The layout and types of apartments (serviced and non-serviced, as well as affordable rental) allows for housing diversity to accommodate differing lifestyles within the immediate vicinity of a mixed use development, with increased access to a wider range of services with a high degree of access to public transport (such as bus and tram facilities). The proposal achieves a higher gross density of more than 67 dwellings per hectare (in the form of three Towers (East, West and North) within a centre zone. In addition, this proposal is in an area targeted along arterial roads for further intensification and compact urban infill.

Design and Appearance

PDC 7 Building appearance should be compatible with the desired character of the locality, in accordance with any relevant zone, policy area or precinct, in terms of built form elements such as:

- (a) building height
- (b) building mass and proportion
- (c) external materials, patterns, textures, colours and decorative elements
- (d) ground floor height above natural ground level
- (e) roof form and pitch
- (f) facade articulation and detailing and window and door proportions
- (g) verandas, eaves and parapets
- (h) driveway crossovers, fence style and alignment.

PDC 8: Residential development in groups should avoid undue repetition of style and external appearance.

Analysis

The proposed development has been scaled down to provide a more residential feel than the previous design, with the mass and proportion articulated by incorporating graduated elevations for the two freestanding apartment buildings on the Elizabeth Avenue side (separate to the retail area) with the eight storeyed building located towards Anzac Highway. The proposed development would be the first of its kind in this location and a focal point that would add to the character of the area. The materiality and design techniques (contrast, repetition, colour and texture) used to harmonise the building elements within the locality would create an attractive building façade that provides sufficient interest, at both a pedestrian level and when viewed from further afield.

This AR concludes the design and appearance is suitable for the zone and policy area, even though the height goes beyond that stipulated in the Development Plan.

Overshadowing

PDC 12: The design and location of buildings should ensure that direct winter sunlight is available to adjacent dwellings, with particular consideration given to:

- (a) windows of habitable rooms, particularly living areas
- (c) upper-level private balconies that provide the primary open space area for any dwelling
- (d) access to solar energy.

PDC 13: Development should ensure that north-facing windows to habitable rooms of existing dwelling(s) on the same allotment, and on adjacent allotments, receive at least 3 hours of direct sunlight over a portion of their surface between 9.00 am and 5.00 pm on the 21 June.

PDC 14: Development should ensure that ground-level open space of existing buildings receives direct sunlight.

Analysis

The shadow modelling provided in the Amendment to the AR (Section 3.4.9) shows that the adjoining residences would be overshadowed by the proposed development from 9.00am to 12.00 noon during the month of June, but with adequate solar access (3 hours of direct sunlight) prevailing from noon onwards. There would be no overshadowing in summer months of the adjoining dwellings from the proposed development.

Private Open Space

PDC 34: Private open space should not include driveways, effluent drainage areas, rubbish bin storage, sites for rainwater tanks and other utility areas, **sites for outbuildings** and common areas such as parking areas and communal open space in residential flat buildings and group dwellings, and should have a minimum dimension of:

- (a) 2.5 metres for ground level or roof-top private open space
- (b) 2 metres for upper level balconies or terraces.

PDC 35: Balconies should make a positive contribution to the internal and external amenity of residential buildings and should be sited adjacent to the main living areas, such as the living room, dining room or kitchen, to extend the dwelling's living space.

Visual Privacy

PDC 39: Upper level windows, balconies, terraces and decks should have a sill height of not less than 1.7 metres or be permanently screened to a height of not less than 1.7 metres above finished floor level to avoid overlooking into habitable room windows or onto the useable private open spaces of other dwellings.

PDC 40: Permanently fixed external screening devices should be designed and coloured to blend with the associated building's external material and finishes.

Analysis

The Development Plan policy is silent in regard to private open space for multi-storey buildings. However, the design of the residential component includes adequate setbacks at the upper levels to allow for a certain amount of private open space in the form of balconies for each apartment. It is proposed that any overlooking would be managed through appropriate screening. The West Tower on the west and south western side would need to be screened due to its proximity to existing residences for overlooking potential.

The proposed development has no shared facilities. The individual balconies for each apartment range from 8m² to 14m² and are adjacent the living areas (as stipulated in PDC 34 and 35). Some of the apartment balconies are partially screened with timber louvres. Residential roofing along Elizabeth Avenue blocks any potential overlooking from the East Tower apartments. There is also sufficient privacy and separation between apartments.

The AR concludes that overlooking would be managed through appropriate screening with further detail to be provided to identify the final nature of the chosen product.

General Section

Site Contamination

PDC 13: Development, including land division, should not occur where site contamination has occurred unless the site has been assessed and remediated as necessary to ensure that it is suitable and safe for the proposed use.

Analysis

The site has a history of commercial/retail use, with some residential buildings in the past. The nature of the built form and types of tenancies may have changed over the years, with a third of the site being developed. The site intends to remain commercial/retail at the ground and first level, as well as associated car parking, with the apartments being constructed above those levels. The Amendment to the DR (Section 3.4.6) indicates, as per the previous geotechnical report in the DR there is unlikely to be any contamination.

Further to the above provision it has been recommended in comments from the Environment Protection Authority that a site history be prepared that covers the lands use since 2009. This should be included as part of the recommended Construction Environment Management and Monitoring Plan.

General Section

Landscaping, Fences and Walls

Objective 1: The amenity of land and development enhanced with appropriate planting and other landscaping works, using locally indigenous plant species where possible.

Objective 2: Functional fences and walls that enhance the attractiveness of development.

PDC 1: Development should incorporate open space and landscaping and minimise hard paved surfaces in order to:

- (a) complement built form and reduce the visual impact of larger buildings (eg taller and broader plantings against taller and bulkier building components)
- (b) enhance the appearance of road frontages
- (c) screen service yards, loading areas and outdoor storage areas
- (d) minimise maintenance and watering requirements
- (e) enhance and define outdoor spaces, including car parking areas
- (f) maximise shade and shelter
- (g) assist in climate control within and around buildings
- (h) minimise heat absorption and reflection
- (i) maintain privacy
- (j) maximise stormwater reuse
- (k) complement existing vegetation, including native vegetation
- (l) contribute to the viability of ecosystems and species

PDC 2: Landscaping should:

- (a) include the planting of drought tolerant species, including locally indigenous species where appropriate
- (b) be oriented towards the street frontage
- (c) result in the appropriate clearance from powerlines and other infrastructure being maintained.

PDC 3: Landscaping should not:

- (a) unreasonably restrict solar access to adjoining development
- (b) cause damage to buildings, paths and other landscaping from root invasion, soil disturbance or plant overcrowding
- (c) introduce pest plants
- (e) remove opportunities for passive surveillance
- (g) increase the risk of weed invasion
- (h) obscure driver sight lines

PDC 4: A minimum of 10 per cent of a development site should be landscaped. The development site refers to the land which incorporates a development and all the features and facilities associated with that development, such as outbuildings, driveways, parking areas, landscaped areas, service yards and fences. Where a number of buildings or dwellings have shared use of such features and facilities, the development site incorporates all such buildings or dwellings and their shared features and facilities.

PDC 5: A landscape area of at least 3 metres in width should be provided between non-residential development and the boundary of a residential zone.

PDC 6: Fences and walls, including retaining walls, should:

- (a) not result in damage to neighbouring trees
- (b) be compatible with the associated development and with existing predominant, attractive fences and walls in the locality
- (c) enable some visibility of buildings from and to the street to enhance safety and allow casual surveillance
- (d) incorporate articulation or other detailing where there is a large expanse of wall facing the street
- (e) assist in highlighting building entrances
- (f) be sited and limited in height, to ensure adequate sight lines for motorists and pedestrians especially on corner sites
- (g) in the case of side and rear boundaries, be of sufficient height to maintain privacy and/or security without adversely affecting the visual amenity or access to sunlight of adjoining land
- (h) be constructed of non-flammable materials.

Analysis

The perspective drawings in the Amendment to the DR (Attachment 5 & 6) show more detailed landscaping provisions at the street and ground level car park. The perspectives also show the use of green walls and vegetated awnings. Mature trees are shown throughout the car parking at ground level, between the Highway Hotel and the internal retail frontages. The DR (Section 3.1) also speaks about large container planting and landscape beds. The Amendment to the DR speaks of both hard and soft vegetative treatments with shade trees (*Platanus and Pyrus spp.*). Plants would be selected for their micro-climatic properties, architectural elements, indigenous and safety suitability (with a preference for native species). From the perspectives the plantings appear sufficient. A detailed Landscape Plan is to be developed at the design development stage. Irrigation for landscaping is to be provided by reticulated water reuse.

Solid fencing (in the form of a 2.1 metre high timber fence) would be provided between the development and the boundary of the residential zone, which is of sufficient height to form a visual barrier to maintain privacy.

This AR recommends that there be a condition requiring lodgment of a detailed Landscaping Plan that includes the fencing details (should the proposal be approved). There is an opportunity to provide landscaping to potentially offset the ‘heat island affect’ created by the built form and its surrounds.

General Section

Crime Prevention

Objective 1: A safe, secure, crime resistant environment where land uses are integrated and designed to facilitate community surveillance.

PDC 1: Development should be designed to maximise surveillance of public spaces through the incorporation of clear lines of sight, appropriate lighting and the use of visible permeable barriers wherever practicable.

PDC 2: Buildings should be designed to overlook public and communal streets and public open space to allow casual surveillance.

PDC 3: Development should provide a robust environment that is resistant to vandalism and graffiti.

PDC 4 : Development should provide lighting in frequently used public spaces including those:

- (a) along dedicated cyclist and pedestrian pathways, laneways and access routes
- (b) around public facilities such as toilets, telephones, bus stops, seating, litter bins, automatic teller machines, taxi ranks and car parks.

PDC 5: Development, including car park facilities should incorporate signage and lighting that indicate the entrances and pathways to, from and within sites.

PDC 6: Landscaping should be used to assist in discouraging crime by:

- (a) screen planting areas susceptible to vandalism
- (b) planting trees or ground covers, rather than shrubs, alongside footpaths
- (c) planting vegetation other than ground covers a minimum distance of two metres from footpaths to reduce concealment opportunities.

PDC 7: Site planning, buildings, fences, landscaping and other features should clearly differentiate public, communal and private areas.

PDC 8: Buildings should be designed to minimise and discourage access between roofs, balconies and windows of adjoining dwellings.

PDC 10: Development should avoid pedestrian entrapment spots and movement predictors (e.g. routes or paths that are predictable or unchangeable and offer no choice to pedestrians).

Analysis

The amended proposal is consistent with the general provisions. It shows active retail frontages within the development (internally) and externally to the edge of Anzac Highway and a portion of Marion Road. Outdoor dining is proposed along the promenade. There appears to be sufficient natural surveillance throughout the at grade car park and retail area. The proposed development on Marion Road shows a more residential scale. Elizabeth Avenue has no retail frontage due to the supermarket (which has its main entry focus within the mall). The East and West Tower entrances are located on the Elizabeth Avenue side of the site, but there is still adequate legibility and sightlines. The Amendment to the DR (3.2.4) states there would be good levels of illumination.

This AR concludes there are adequate sightlines throughout the site, with no entrapment points. As per the Amendment to the DR, the residential development would also increase the levels of passive surveillance.

General Section

Water Sensitive Urban Design

PDC 5: Development should be designed to maximise conservation, minimise consumption and encourage reuse of water resources.

PDC 7: Development should be sited and designed to:

- (a) capture and re-use stormwater, where practical
- (b) minimise surface water runoff
- (c) prevent soil erosion and water pollution
- (d) protect and enhance natural water flows
- (f) not contribute to an increase in salinity levels
- (g) avoid the water logging of soil or the release of toxic elements
- (h) maintain natural hydrological systems and not adversely affect:
 - (i) the quantity and quality of groundwater
 - (ii) the depth and directional flow of groundwater

PDC 8: Water discharged from a development site should:

- (a) be of a physical, chemical and biological condition equivalent to or better than its pre-developed state
- (b) not exceed the rate of discharge from the site as it existed in pre-development conditions.

PDC 9: Development should have adequate provision to control any stormwater over-flow runoff from the site and should be sited and designed to improve the quality of stormwater and minimise pollutant transfer to receiving waters.

PDC 10: Development should include stormwater management systems to mitigate peak flows and manage the rate and duration of stormwater discharges from the site to ensure the carrying capacities of downstream systems are not overloaded.

PDC 11: Development should include stormwater management systems to minimise the discharge of sediment, suspended solids, organic matter, nutrients, bacteria, litter and other contaminants to the stormwater system.

PDC 12: Stormwater management systems should preserve natural drainage systems, including the associated environmental flows.

PDC 13: Stormwater management systems should:

- (a) maximise the potential for stormwater harvesting and reuse, either on-site or as close as practicable to the source
- (b) utilise, but not be limited to, one or more of the following harvesting methods:
 - (i) the collection of roof water in tanks
 - (ii) the discharge to open space, landscaping or garden areas, including strips adjacent to car parks
 - (iii) the incorporation of detention and retention facilities

PDC 14: Where it is not practicable to detain or dispose of stormwater on site, only clean stormwater runoff should enter the public stormwater drainage system.

Analysis

The proposed development acknowledges Water Sensitive Urban Design principles within its water management including water supply, sewage and stormwater management through the use of the following:

- permeable paving,
- underground storage tanks (capacity of 100,000 litres),
- treated water collected from the pavement to reduce rubbish and oils
- roof water for irrigation re-use
- stormwater reuse for internal reuse (to EPA class 2 standards)
- the use of informal swales as filters and for stormwater retention/detention where practicable

All water exiting the site is proposed to be clean and treated appropriately. Through the use of gross pollutant traps at the outlet end of stormwater discharge lines, oil and plate separators, and the design of all paved areas to ensure “first flush” principles. At the detailed design phase capture of stormwater for reuse such as toilet flushing would be considered.

Water discharged from the site would need to have a rate of discharge that does not exceed the discharge rate from the site as it existed in pre-development conditions.

The Amendment to the DR (Section 3.4.4) speaks of meeting the above provisions through best practice water sensitive design outcomes. This will be provided at the detailed design phase (if the proposal is approved). The proposed development would need to meet both the Council's and if required, the EPA's standards.

General Section

Energy Efficiency

Objective 1: Development designed and sited to conserve energy.

Objective 2: Development that provides for on-site power generation including photovoltaic cells and wind power.

PDC 1: Development should provide for efficient solar access to buildings and open space all year around.

PDC 2: Buildings should be sited and designed:

- (a) to ensure adequate natural light and winter sunlight is available to the main activity areas of adjacent buildings
- (b) so that open spaces associated with the main activity areas face north for exposure to winter sun.

On-site Energy Generation

PDC 3: Development should facilitate the efficient use of photovoltaic cells and solar hot water systems by:

- (c) designing roof orientation and pitches to maximise exposure to direct sunlight.

Analysis

The design incorporates passive design solutions. The Amendment to the DR (Section 3.4.1) indicates that each element of the project would be reviewed for performance in terms of energy cycle, resource consumption, waste generation and community impact to allow for a sustainable outcome over the long term. The proposal would utilise a number of energy efficient elements to support a reduced carbon footprint. Some of the elements proposed are low energy LED lighting, indirect evaporative cooling and air quality sensors in the basement car park (to regulate the exhaust fan speed), recycled water and performance glazing.

General Section

Waste

PDC 5: Development should include appropriately sized area to facilitate the storage of receptacles that would enable the efficient recycling of waste.

PDC 6: Development that involves the production and/or collection of waste and/or recyclable material should include designated collection and storage area(s) that are:

- (a) screened and separated from adjoining areas
- (b) located to avoid impacting on adjoining sensitive environments or land uses
- (c) designed to ensure that wastes do not contaminate stormwater or enter the stormwater collection system
- (d) located on an impervious sealed area graded to a collection point in order to minimise the movement of any solids or contamination of water
- (e) protected from wind and stormwater and sealed to prevent leakage and minimise the emission of odours
- (f) stored in such a manner that ensures that all waste is contained within the boundaries of the site until disposed of in an appropriate manner.

Analysis

The DR (Section 4.5) proposes waste management strategies using a commercial waste removal service. The retail/commercial waste would be contained within the site in the enclosed service area to minimise odour impacts on the neighbouring residences. Recycling would be enforced. Waste removal for the

apartments would be via third party collection and would comprise bins for both general waste and recycling, which would be located at ground level for commercial removal on a weekly basis. The RD (Appendix 2) provides revised plans showing the locations of bins for the site. The proposal would not rely on Council's three bin system.

Neighbourhood Centre Zone

Objective 1: A centre providing a range of shopping, community, business, and recreational facilities for the surrounding neighbourhood.

Objective 2: A centre that provides the main focus of business and community life outside a district centre, and provides for the more frequent and regularly recurring needs of a community.

Objective 3: A centre accommodating residential development in conjunction with non-residential development.

Land Use

PDC 1 : The following forms of development are envisaged in the zone:

- consulting room
- dwelling in conjunction with non-residential land use
- health centre
- office
- restaurant
- shop
- supermarket.

PDC 3: Development comprising a variety of residential and non-residential uses should only be undertaken if such development does not prejudice the operation of existing or future non-residential activity within the zone.

Form and Character

PDC 4: Dwellings should be located only behind or above non-residential uses on the same allotment.

Plympton Policy Area 16

Objective 1: Development that contributes to the desired character of the policy area.

The policy area would provide a range of facilities and services to cater for the surrounding population. Retail facilities would be confined to the north-west quadrant of the intersection and consist primarily of convenience goods outlets with a limited range of the more frequently required comparison goods and some service facilities.

The south-western quadrant of the intersection currently contains a hotel, take-away food outlets and some bulky good outlets. This area would continue to accommodate these types of activities as well as other low traffic-generating commercial and low-intensity retail activities.

The south-eastern quadrant of the intersection would contain small-scale office facilities accommodating a range of community, medical and service activities.

All development would address Anzac Highway and Marion Road and assist in defining the intersection. The interface between centre development and residential areas would be appropriately treated through a combination of setbacks and landscaping to ensure that potential impacts on the residential area are

minimised.

Land Use

PDC 1: The following forms of development are envisaged specifically in the policy area:

- bank
- bulky goods outlet
- child care facility
- commercial premises
- community facility
- consulting room
- entertainment facility
- library
- health centre
- office
- restaurant
- shop
- supermarket.

PDC 2: The total gross leasable retail floor space within the policy area should not exceed 3500 square metres.

Form and Character

PDC 3: Development should not be undertaken unless it is consistent with the desired character for the policy area.

PDC 4: Development should be undertaken in accordance with [Concept Plan Map WeTo/25 - Plympton Neighbourhood Centre](#) and in particular:

- (a) landscaping should measure 3 metres in width along the boundaries where depicted by the Concept Plan Map WeTo/25 - Plympton Neighbourhood Centre
- (b) the area marked 'Retail Core' should primarily accommodate retail facilities
- (c) the area marked 'Commercial' should accommodate takeaway food outlets, restaurants, banks, commercial facilities, bulky goods outlets and small scale, low traffic generating retail uses
- (d) the area marked 'Office' should accommodate office, community, medical and service activities.

PDC 5: Development should be set back no less than 5 metres from all roads.

PDC 6: Development should be designed in accordance with the following parameters:

Location	Maximum number of storeys and maximum vertical wall height
Where the development is facing onto an arterial road	three storeys and 12.5 metres
Development elsewhere in the policy area	two storeys and 8.5 metres

Non-complying Development

Development (including combinations thereof, or more than one of a particular kind, alterations and/or additions to existing buildings or structures building work, a change in the use of land, or division of an allotment) for the following is non-complying:

Forms of development	Exceptions
Shop or group of shops within that area identified as 'Commercial' and 'Office' as shown on Concept Plan Map WeTo/25 - Plympton Neighbourhood Centre .	Except for bulky goods outlets with a combined leasable floor area of greater than 500 square metres within that area identified as 'Commercial' on Concept Plan Map WeTo/25 - Plympton Neighbourhood Centre .

Analysis

The proposed development is nominally non-complying under the current zone provisions, due to the retail space exceeding the 3500m² leasable area in Policy Area 16. The types of use identified in Policy Area 16 are commercial or office use, as shown on the concept plan Map WeTo/25- Plympton Neighbourhood Centre. Policy Area 16 is intended for low generating commercial and retail uses. The proposed supermarket cannot be considered to be a low generating use, neither is the proposed commercial/retail with a combined area of 5080m².

The revised proposal has 108 apartments, where originally there were 120 apartments proposed. The residential component satisfies the desirability of the Zone to accommodate higher density development and to locate it above the commercial/retail, which is situated at the lower levels (along with car parking). The existing Highway Hotel is integrated into the proposed development in a unified manner.

The proposed development seeks to reinforce and build on the existing retail experience, to provide facilities that respond to local demand/convenience (and the wider community) and an enhanced restaurant/café experience. The mixed use development should invigorate the existing Neighbourhood Centre (Plympton) Zone by the additional opportunity for choice in shopping, through improved facilities. However, regardless of the proposed development, historically the current neighbourhood centre appears to have had a shopping focus that straddles both sides of an arterial road.

Whilst the proposal does not satisfy all the provisions in the Zone, in regards to height and leasable area for retail use, the revitalisation of the site into a mixed use development or TOD is considered satisfactory and an appropriate use of the site.

Residential Zone

Objective 1: A residential zone comprising a range of dwelling types, including a minimum of 15 per cent affordable housing.

Objective 2: Dwellings of various types of low to medium densities at one to three storeys in height.

Objective 3: Increased dwelling densities in close proximity to centres, public transport routes and public open spaces.

Objective 4: Development that contributes to the desired character of the zone.

Affordable Housing

PDC 10: Development should include a minimum 15 per cent of residential dwellings for affordable housing.

PDC 11: Affordable housing should be distributed throughout the zone / policy area to avoid over-concentration of similar types of housing in a particular area.

Residential /Policy Area 21

Objective 1: Development that contributes to the desired character of the policy area.

Form and Character

PDC 2: Development should not be undertaken unless it is consistent with the desired character for the policy area.

This policy area would continue to develop as a residential area of medium density and infill development.

Development would be in keeping with the existing character of the area with buildings that maintain the traditional character through a variety of designs. Appropriately designed modern interpretations of the existing residential character, such as post World War Two and 1950s Tudor style housing, would be encouraged where suitable.

Analysis

The Residential Zone generally speaks about the provision of a range of housing types and styles to meet the diversity of needs of the population. The Zone supports increased and medium densities, but nothing higher than three storeys. The residential apartment buildings proposed within the Zone are to be five storeys and form part of a wider and holistic redevelopment of the area. There are only five allotments that form part of the site that are in the Residential Zone. This portion of the site would house the delivery route, service areas, the supermarket and the Western Tower (four levels of apartments above a car park). The encroachment of the proposal into the Zone area is minor and only two storeys above the three storey maximum. The main impact to the existing residences would be the increased traffic generation and overlooking to adjoining properties.

CONCLUSION

The West Torrens Development Plan comprises a number of broad based provisions that reflect the direction of the 30 Year Plan for Greater Adelaide in regard to Transport Orientated Development (TOD). The land use is envisaged through its potential to rehabilitate and make effective use of the site in the Development Plan but, not to the extent proposed within Policy Area 16.

Parking is adequate, with shared car parking on the other side of Anzac Highway. Security can be managed on site. The acoustic issues can be addressed to satisfy the differing land uses, through suitable attenuation measures. The choice of residential apartment and serviced apartment components is also appropriate, given its location, accessibility to transport and convenience facilities. The development defines and addresses the southern corner of the Anzac Highway/Marion Road to provide a prominent landmark with a contemporary architectural style that improves the site substantially.

This AR concludes that, while the height and scale are beyond the provisos specified in the Development Plan, the impacts arising from the increased height are acceptable. The higher built form does have the ability to accommodate a range of uses, higher living densities and the potential to create lower energy demands through the use of Ecological Sustainable Design principles. Overlooking can be managed through design (i.e. screening) and conditioned (if the proposal is approved).

The DR (Section 2.1) indicates the West Torrens Council has identified a target population of 70,000 to be achieved by 2025. Thus, infill development is supported especially along transport corridors within metropolitan Adelaide which in turn assists in creating a more compact city.

The amended proposal shows some signage (Amendment to the DR Attachments 5 & 6). The proponent at this stage does not have the details of the tenancies proposed. There is no detail regarding types, size, illumination or colours. This AR concludes that there is not enough information provided by the DR and RD to make a thorough assessment of the signage. The proponent states that the signage would be part of a separate application.

3.2 THE PREMIER'S SEVEN STRATEGIC PRIORITIES

1. Creating a vibrant city
2. An affordable Place to live
3. Every chance for every child
4. Growing advanced manufacturing
5. Safe communities, healthy neighbourhoods
6. Realising the benefits of the mining boom for all
7. Premium food and wine from our clean environment

The proposed development addresses a number of priorities by revitalizing an underutilised site in a prime location, providing increased density with affordable rentals, a lifestyle choice with potential reduction in vehicle use, a secure place to live within an existing neighbourhood, business opportunities, tourist accommodation and employment opportunities at a number of levels.

3.3 SOUTH AUSTRALIA'S STRATEGIC PLAN

South Australia's Strategic Plan (2011) seeks to widen opportunities for all South Australians through a number of strategic targets.

The proposed shopping centre and residential apartment complex is supported by six of the targets within the Plan. These are as follows:

T1.1 – Economic growth: exceed the national economic growth rate by 2014.

T1.5 Business Investment: exceed Australia's ratio of business investment as a percentage of the economy by 2014.

T1.10 Jobs: Better the Australian average employment growth rate by 2014.

T1.12 – Employment participation: increase the employment to population ratio, standardised for age differences, to the Australian average.

T1.15 Tourism industry: increase visitor expenditure in South Australia tourism industry from \$3.7 billion in 2002 to \$6.3 billion by 2014.

T3.6 Use of public transport: increase the use of public transport to 10% of metropolitan weekday passenger vehicle kilometres travelled by 2018.

Analysis

The economic assessment contained within the DR (Section 46) indicates that the proposed development would benefit the broader locality and metropolitan area through increased employment, investment and facilities. The Amendment to the DR (Executive Summary and Section 3.5) estimates the proposed development would indirectly create 413 full time job equivalents which increases job opportunities for those living within or close to the Plympton area and contributes to lowering unemployment. This AR concludes that the proposed development accords with the relevant targets of the State Strategic Plan.

3.4 PLANNING STRATEGY - 30 YEAR PLAN FOR GREATER ADELAIDE

The appropriate Planning Strategy is the *30 Year Plan for Greater Adelaide (2010)* which is a volume of the *South Australian Planning Strategy*. A key direction underpinning the Planning Strategy is the achievement of ecologically sustainable development through decision making processes that effectively integrates both long and short-term economic, environmental, social and equity considerations.

The Plan is used by the State Government to guide the planning and delivery of services and infrastructure, such as transport, health, schools, community facilities and the supply of water and water efficiencies. The main aim of the Plan is to outline how the South Australian Government proposes to balance population and economic growth with the need to preserve the environment and protect the heritage, history and character of Greater Adelaide. The Plan seeks to create vibrant and liveable communities, while protecting the regional hinterlands, the primary production lands and sustaining natural resources. The Plan supports the location of new housing developments at higher densities close to

public transport networks to allow residents to work shop and access services closer to where they live. Finally, the Plan is one of the key tools to assist the State Government, local government and the entire community in building resilience to the risks and impacts of climate change. Within this context, the following provisions of the *30 Year Plan for Greater Adelaide* are considered relevant:

New Transit Corridors, Growth Areas, Transit-Oriented Developments And Activity Centres

Policies

2. Locate the majority of Greater Adelaide's urban growth within existing built-up areas through increases in density in strategic locations.
3. Concentrate new growth within metropolitan Adelaide in transit corridors, transit-orientated developments and activity centres so that the urban character of the majority of neighbourhoods remains largely unchanged.
4. Locate new growth areas contiguous to transit corridors wherever possible.
5. Activate and rejuvenate higher- order activity centres and provide for integrated mixed uses around transport interchanges and wherever possible at the neighbourhood level.

Targets

- C Locate about 60 percent of metropolitan Adelaide's new housing growth (50 per cent of the Greater Adelaide region's new housing growth) within 800 metres of current or extended transit corridors.
- D Densities of development in transit would vary throughout the corridor but gross densities would increase on average from 15 to 25–35 dwellings per hectare. Net residential site densities for individual developments would be higher than the average gross density.

Transit Corridors

Policies

8. Designate and protect transit corridors so a significant amount of Greater Adelaide's net dwellings growth and net jobs growth can be generally located within 800 metres of a major transit corridor or within 400 metres of other transit corridors. .
12. Ensure Structure Plans clearly designate key precincts within the transit corridor, which include mixed-use transit oriented developments, activity centres, open space precincts and, where appropriate, employment lands.
14. Concentrate higher densities and medium high-rise development around mixed use activity centres and railway tram and bus stations.
15. Ensure that there is an effective transition between higher densities and medium-rise development (near shops and stations) and existing low-rise detached housing. Structure Plans for transit corridors would prescribe that densities and building heights decrease as development moves away from transport thoroughfares and shops and railway stations. This would mean that traditional detached dwellings would generally be bordered by low-rise dwellings such as townhouses.

Transit-oriented Developments

Policies

1. Locate transit-oriented developments next to mass transit stations and interchanges (rail, bus or tram) and connect to existing activity centres where possible.

Targets

- L. Encourage local government to identify and facilitate delivery of more than 20 other transit-oriented-style developments, such as Castle Plaza/ Edwardstown, Kilkenny, Munno Para and near Tambelin.

Mixed-use Activity Centres

Policies

25. Adopt a typology of activity centres ranging from the Capital City centre to neighbourhood and specialist centres, as set out in the typology table in Appendix C and represented in Map D6.
29. Ensure activity centres promote mixed-use developments rather than separate residential, commercial and retail centres.
30. Develop higher-density residential development within and adjacent to activity centres.

Urban Design

Policies

3. Require new mixed-use medium- and high-rise developments to provide active street frontages (such as shops, services and restaurants) to encourage connectivity and increase public safety.
5. Set, through the planning controls, very high standards for urban character and quality of design in consultation with the Commission for Integrated Design.
6. Structure Plans for greenfield developments, urban infill and transit-oriented developments would set objectives and guidelines for the quality of building performance outcomes in terms of: climate response (for example, solar orientation and ventilation) , energy use, water use and recycling, noise attenuation and air quality, improving the aesthetics of the public realm.

Analysis

The proposed development supports the achievement of a more transit-focused and connected city and an increase in the use of public transport, by providing a location for jobs and higher density housing through concentrating commercial and retail activities in transit corridors. It is also less than 800 metres from a designated transit corridor and would create a higher density within a mixed use activity centre.

Whilst the proposed development is not next to a fixed transit station, it is adjacent to bus stops and is within walking distance of the tram station. The proposed development is located within an existing neighbourhood centre and, as such, furthers the process of urban renewal through its integrated mixed-use focus.

The proposed development provides active internal frontages in the form of shops, cafes and outside dining, with convenient access through the site to public transport options. The apartment tower components have a more residential feel at street level. The overall design is quite contemporary and seeks to incorporate a number of energy and water efficiency objectives to provide an improved urban infill development that integrates well with the existing built form.

The development is consistent with the policies as expressed in the 30 Year Plan for Greater Adelaide.

3.5 BUILDING RULES

This AR does not include a specific assessment of the development against the provisions of the Building Rules under the *Development Act 1993*. If the Governor grants a provisional development authorisation, pursuant to Section 48 of the Act, further assessment and certification of the proposed development against the Building Rules may be set as a reserved matter for further decision-making. However, a decision would only be made by the Governor or his delegate *after* a private certifier or the relevant council for the area in which the development has been proposed, has assessed and certified that any work that constitutes ‘building work’ under the Act complies with the Building Rules and has supplied this information to the Minister (as required by Regulation 64 of the *Development Regulations 2008*). The Building Rules certification must be consistent with any provisional development authorisation and would ensure safety (including fire safety) and stability of construction.

3.6 ENVIRONMENT PROTECTION ACT 1993

The proposed development does not involve an activity of environmental significance as defined in Schedule 1 of the *Environment Protection Act, 1993* and therefore did not need to be formally referred to the Environment Protection Authority (EPA). Advice was nevertheless sought from the EPA in relation to matters under its jurisdiction. The proponent would need to be aware of the *EPA Stormwater Pollution Prevention Code of Practice for the Building and Construction Industry* during construction.

The proponent would need to ensure that the potential impacts related to noise and stormwater management (both during construction and following the completion of the building and the occupancy of mixed uses) are appropriately managed.

The following Environment Protection Policies are applicable:

- *Environment Protection (Water Quality) Policy 2003.*
- *Environment Protection (Waste to Resources) Policy 2010*
- *Environment Protection Policy (Noise) 2007* in conjunction with the *(Australian Standard AS/NZS 2107:2000 Acoustics –Recommended design sound levels and reverberation times for building interiors).*
- *Environment Protection (Air Quality) Policy 1994 (in conjunction with Odour Assessment Using Odour Source Modeling).*

In addition, there are a range of supporting documents and guidelines that are endorsed, or have been adopted, by the EPA and would have relevance for the proposal, including:

- EPA Guideline: Bunding and Spill Management (2012)
- Guidelines for Separation Distances 2007.
- Guideline for Stockpile Management: Waste and waste derived products for recycling and reuse 2010.
- National Environmental Protection Measures (NEPM), such as for the Assessment of Site Contamination, Ambient Air Quality and Air Toxics.

These matters are further considered in the Assessment Section of this AR.

3.7 MINISTERS SPECIFICATION SA 78B CONSTRUCTION REQUIREMENTS FOR THE CONTROL OF EXTERNAL SOUND (FEBRUARY 2013).

This specification needs to be read in conjunction with the National Construction Code Series - Building Code of Australia (Volumes One and Two) (NCC). The intent of this document is to protect occupants of Class1, 2, 3 and 4 buildings from the existing or future road impact and from mixed land use area. The apartment buildings/component is classified as Class 2.

The proponent would need to ensure the potential impacts related to external noise i.e. traffic noise primarily from Anzac Highway and Marion Road, as well as noise from the proposed mixed uses and the existing Highway Hotel (music/entertainment and late night vehicle movement etc) are considered in terms of the types of construction materials that should be used to attenuate the apartment components of the development. The construction materials are rated as to their attenuation level and control of sound. The level of attenuation provided by the building envelope and ventilation system against the external airborne sound depending on the type of sound that can be heard must be sufficient to maintain sound levels not exceeding suitable internal sound criteria obtained from either the council or the Environment Protection Authority. Designated areas are identified on the Noise and Air Emissions Overlay in the relevant Development Plan.

The AR concludes that the proponent will need to provide detailed acoustic treatment details as part of the final plans if approved.

4 CONSULTATION

4.1 COMMUNITY

There were thirteen submissions in response to the original exhibition period in 2009. An Amendment to the DR was submitted and as part of the process a further exhibition period was required. Eighteen (18) submissions were received from the public, the City of West Torrens Council and relevant Government Agencies.

A brief summary of issues from all the submissions are as follows:

Public

General

- Believe the proposal has merit and would further stimulate development in the local community
- Power on the site should be put underground
- Garbage collection should use “Hippo” receptacles
- The “Proposed North Plympton Shopping Centre” was misleading and gave little public awareness to the residents it is most likely to impact
- The proposal would overcrowd an already busy system (the tram)
- A true TOD is for high-density residential infill and this proposal is for student/tourist short term accommodation
- Noise would be an issue
- Visual impact- proposed height is out of context with existing area and would set a precedent
- No public open space/recreation area which is a requirement of a TOD
- What significant efforts are being made on the back of the centre to integrate it visually into the existing streetscape
- The exit for services vehicles would be noisy and unattractive
- The Council should not pick up garbage from the site via Elizabeth Avenue
- The position of the site deserves a quality development not a “Chunking Mansion”
- Support for the proposal
- Construction impacts (noise/dust) and hours of operation
- On consideration given to the immediate residents
- Insufficient consultation time
- Potential inappropriate anti-social behaviour and graffiti
- Would provide a much needed focal point
- Plans are misleading and confusing insufficient setbacks for Elizabeth Avenue
- The proposal will impact negatively on the existing family lifestyle
- Demand for the serviced apartments analysis inadequate
- Existing retail such as Harbour Town, Jetty Road or Castle Plaza not taken into account in the analysis

Ecologically Sustainable Development

- There should be double glazing to the proposed apartments to minimise noise
- The use of solar power for hot water and electricity needs to be investigated
- Water reuse should occur

Traffic Issues

- Increased traffic flow with the local road network being congested
- Insufficient car parking on the site – increased parking within local road network adjacent the site
- Major traffic assessment of the roads and surrounds is essential
- Concerns about the increased traffic in Elizabeth Avenue and the safety of the children during and after school hours.

- Traffic is already restricted to one lane during peak times.
- Elizabeth Avenue is already a traffic “shortcut” used to avoid traffic lights and the tram crossing and as such further increase in traffic would only increase the problem
- Elizabeth Avenue Entrance onto Marion Road should have a slip lane to the current car park at the car park entrance of Highway Hotel
- The tram should have an overpass/underpass to improve traffic flow along Marion Road
- The increased traffic on Marion Road due to the proposal would further congest traffic
- Onsite parking restriction should occur to deter tram users from all day parking
- The intersections at both Cross Roads and Anzac Highway with Marion Road are currently congested at peak times. This would result in more traffic congestion than is currently acceptable
- Construction vehicles should be restricted from using the western end
- It would be preferable that commercial traffic/trucks turn left out of Elizabeth Avenue onto Marion Road. What is proposed to ensure this?
- A chicane should be constructed on the eastern end of Elizabeth Avenue and the corner of Maynard Road to slow traffic or restrict entering from the eastern end of Elizabeth Avenue. This would minimise the congestion of peak period traffic and decrease likelihood of accidents
- Where would employees park, the surrounding streets would not cope with any overflow from the proposed development
- The hours of operation for the centre and the existing hotel would ensure the area is constantly busy with cars and service vehicles
- Concern for the safety of children walking down Elizabeth Avenue and Marion Road
- Statistics for traffic modelling outdated
- Incomplete parking analysis

4.2 COUNCIL

City of West Torrens

The Council’s submission is summarised below:

- Argue that serviced apartments are similar use to a motel, therefore, residential land use does not form part of the proposal
- TODs are neighbourhoods offering high density, high quality housing located with employment, mass transit connections, services and recreational activities. There are no residential or recreational land uses within the development. It is unclear how the development fits the definition of a TOD. It should be assessed as a large commercial development
- The proposal does not meet the TOD definition as defined by the 30 Year Plan for Greater Adelaide
- The Neighbourhood Centre Zone encourages higher residential development within the Zone, instead serviced apartments with transient occupants are proposed
- The proposal does not make design linkages with nearby land uses
- There is insufficient analysis about overlooking
- An alternative and appropriate solution is required for waste management
- There are no streetscape proposals for Elizabeth Avenue as sought by the DAC guidelines...Streetscape works will need to be negotiated with Council and the applicant shall be responsible for the cost of these works
- Little evidence has been given on the impacts of the encroachment of the development into the Residential Zone and the potential for overlooking
- The applicant would need to discuss with Council effective storm water management for the development
- Due to the potential impacts on Council’s infrastructure from the development, Council would need to be provided with a CEMP to assess the impacts prior to the final development design stage

- The Marion Road/Anzac Highway intersection is already operating above capacity. The increase in traffic would exacerbate the traffic congestion and delays, therefore, the traffic cannot be described as having minimal impact. There is the potential for increased use of residential streets as shortcuts. There is no mention of traffic calming devices or in the case of service vehicles no truck prohibition signage
- The Traffic Impact Statement does not deal with the traffic impact issues for Elizabeth Avenue and other residential streets
- There is concern about the Anzac Highway median be opened up to allow right turns into the subject site
- The parking aisle way for the basement car park needs to be relocated further west
- The applicant should seek further comment from DTEI about the relocation of the bus top and the bus vehicle movements
- The economic retail analysis is inadequate regarding positive return occurring, it did not include Harbour Town as part of the equation
- The DR is unclear about the proposal and its consistency/inconsistency with the current Development Plan
- There is little information regarding storm water management, nor does it adequately address the traffic implications and pedestrian access externally to the site
- No detail on signage
- No pedestrian analysis of the site
- The layout would need to be adjusted to accommodate the standard 19 metre semi- trailer
- Waste removal needs to be addressed for the East and West Towers
- Parking survey has not been updated since 2007 and should be undertaken. The discounting of the hotel car parking by Aurecon is not justified.

In general terms, no objection to a TOD at the Highway Hotel site is raised. However, closer consideration is required in relation to the issues above.

City of Marion

- Inconsistent with the Neighbourhood Centre (Plympton) Zone and concept plan, it does not satisfy the maximum height requirements and is non-complying due to the leasable floor area being greater than 500 square metres
- How does the proposal fit in with the “Centre Hierarchy”
- The proposed development would create a centre that does not allow for good linkages, access and connectivity
- The increased traffic generation would have detrimental impact on adjoining properties
- The loading/unloading areas are sited directly adjacent to residential properties which would have a detrimental impact on their amenity in terms of noise and odour
- The development has inadequate setbacks to Elizabeth Avenue
- The dwellings located directly south of the proposed development shall be unreasonably overshadowed

4.3 GOVERNMENT

Eight Government Agencies responded. Comments raised include:

SA Water

- The diameter of the sewer pipe referred to in the Document should be 525mm
- Any development including landscaping shall be designed to incorporated water conservation principles and devices and WSUD

- Development should only occur where the water supply system can adequately meet quality, quantity, sustainability and reliability standards including the provision for fire fighting and prevention
- The use of rainwater tanks is encouraged
- Reuse of water where appropriate
- The protection of groundwater so that development shall have no deleterious effects on the quality or quantity of groundwater or the natural environs that rely on this water having regard to the *Natural Resources Management Act 2004* (and the requirements of the Department of Water, Land and Biodiversity Conservation) and the *Environment Protection Act 1993*
- The protection of surface water having regard to the *Natural Resources Management Act 2004* and the *Environment Protection Act 1993*.
- The provision of infrastructure (water/wastewater) would be assessed on their individual commercial merits. Any extension or new approach, augmenting and upgrading the mains would be such that the developer would be required to meet the costs associated with these works. This also includes the cost of any wastewater collection, transport sewers within the development itself. Appropriate diameter pipe size would be required for all water infrastructure activities. New development wherever possible should adjoin to existing infrastructure

Metropolitan Fire Service (MFS)

- All building work should comply with the prescriptive requirements of the Building Code of Australia in particular AS2419.1, AS2441, AS 2118.1, AS2444, BCA Spec. E1.8, BCA Tables E2.2a and E2.2b, BCA Part E3, and AS2293.1
- Should variations to the prescriptive requirements of the BCA be proposed, suitably justified 'alternative solutions' should be presented to the MFS for comment and Document in accordance with Regulation 28 of the *Development Act 1993*
- Given the scope of the proposed development and the scale of the fire systems that would be installed, the MFS strongly recommends that the developer liaise with MFS in the early design phase to ensure that a cost effective installation that would also meet the operational needs of the fire service can be achieved
- Notes its previous comments have been addressed and the SAMFS has the resources currently to respond to the development

SA Health

- Had no comments to provide concerning this proposal

Renewal SA

- Notes that 40 of the residential apartments would be for affordable housing and these apartments would meet the Governments criteria. The proponent would need to enter into a legally binding agreement to secure the affordable housing commitment

The Environment Protection Authority

- Demolition/construction phase to comply with Guidelines for particulate impacts
- Any industrial activities to comply with the *Guidelines for Separation Distances 2007*
- The applicant to demonstrate that any retail, residential and recreational component would not be unacceptably exposed to ambient vehicle emissions
- The applicant must address odour impacts from commercial business located below residential dwellings. See *Odour Assessment Using Odour Source Modeling* (EPA April 2007) as well as impacts on adjacent existing residences
- Ventilation from car parks would not adversely impact on the surrounding development. See relevant Guidelines
- The potential noise sources are not addressed in the DR. The residential aspect is likely to have a higher outdoor ambient noise level due to the proximity of mixed uses, traffic and tram noise, mechanical ventilation and general noise transmission within the building. Achieving internal

noise level would rely on design and locating sleeping areas away from noise sources. The mixed use development must achieve the internal noise levels regardless of the noise source. Guidelines are: Australian Standard AS/NZS 2107:2000 *Acoustics –Recommended design sound levels and reverberation times for building interiors*, *Environment Protection (Noise) Policy 2007*. Dependent on the room, noise levels internally would range from 30dB(A) - 45dB(A). Best practice is to attenuate at the source (in the case of music venues) and preferable to build attenuation into the design. EPA gives guidance for both Commercial uses incorporating music within the zone and new mechanical plant that the proponent would need to take note of

- Where site contamination is concerned there is limited references in the DR. The EPA is aware of contamination being found locally. The EPA indorses the use of site contamination auditors to determine the suitability of the site for its use. The planning authority must be satisfied also that the site is suitable for the use proposed
- It is noted that the proponent proposes to use WSUD measures and the EPA supports this. Clarity is required with stormwater initial flow and its outcome. Dust and Sediment Management is inappropriate and needs to be revised. Discharges from the site would need to comply with *Environment Water (Quality) Policy 2003*
- The proposal requires a Waste Management Plan. Construction and demolition waste would need to be segregated. Referral to the EPA *Guideline for Stockpile Management*.
- Asbestos is not to be processed or reused on site. There are no details on the volume of soil to be excavated or the intended reuse/disposal of. The CEMP is to be forwarded to the EPA
- It is unclear as to how the stormwater will be managed during the construction phase
- There is no discussion on groundwater levels in regard to the basement car park – if dewatering is to occur it may require a licence
- air quality modelling should be undertaken in view of the increased traffic and air filtering incorporated into the design

Department of Water, Land and Biodiversity Conservation (now DEWNR)

- Generally supports the proposal
- Supports the roof deck as an initiative. However, as a tool to reduce the heat island effect of the building, it would have been more effective if the roof deck had been positioned north of the main tower. It is acknowledged the site parameters make this difficult
- The Department questions the TOD label for this development. One of the main concepts of a TOD is to create communities with places to bond and due to the transient nature of the occupants of the serviced apartments this is unlikely to occur. It is hoped that Stage 2 is released for residential. The proponent would need to consider the potential problems of co-locating serviced apartments and residential in the same block
- The proponent needs to provide details for landscaping, lighting, street furniture, surface treatments (including contributions to the Urban Forest program) and WSUD as per the guidelines
- Difficult to assess the merits of the proposal due to the lack of detail

Zero Waste SA

- Zero wastes concerns would be adequately addressed if the Management and Materials elements of the Green Star Rating Tool for Residential Centre and Multi Unit Residential rating tools were used to undertake the design of the development. Zero Waste advises the Green Star Rating Tool for Multi Unit Residential is available
- Zero Waste advises that the proponent seek guidance from them in regard to recycling for the retail sector
- That any audits for kerbside waste need to be undertaken by a waste auditing company.
- As this is a multi use site it may be appropriate to place all recyclables into a 660 Litre commercial bin Multi Unit Residential using a chute based system.
- Zero Waste SA advises it is placing an increasing emphasis on capturing food waste from commercial and residential sites

- Integrating waste management in higher density mixed use development needs to be fully considered early in the development planning stage with safe and convenient access for collection vehicles and safe and convenient recycling and waste for residents.

Adelaide Airport Limited

- No objection to the proposal
- The development is not to penetrate the Adelaide Airport Obstacle Limitation Surface
- Crane operation are subject to a separate application
- Restrictions to lighting illumination may apply

Department of Transport Engineering & Infrastructure (now DPTI)

DPTI's comments relate to an amended version of the Major Development that was previously lodged in 2009 for assessment. The current version of the development includes the following changes:

- Slightly reduced floor space for the retail and commercial components whilst retaining ability to provide a full line supermarket, thereby reducing overall car parking demand and traffic generation.
- Reconfigured access and parking arrangements on the site to improve legibility for motorists and pedestrians and improve the functionality of the site.
- DPTI has been provided a copy of the SIDRA and AIMSUN analyses and it is considered that the AIMSUN model provides a satisfactory basis for resolving the traffic issues associated with the development. However, it is noted that the traffic generation assumes a 20% discount. While not objecting in principle, further justification for the 20% discount rate for traffic generation for the retail and supermarket should be provided as part of the final application documentation.
- The AIMSUN Traffic Modelling Document identifies relatively minor improvement needs to the surrounding arterial road network to accommodate the additional traffic generated by the development during the PM peak, being:
 - provision of a separate right turn phase at the Marion Rd / Anzac Hwy intersection for the eastern approach;
 - extension of the Anzac Hwy west approach right turn lane by 20m;
 - increase in phase times for the right turn movement from Anzac Hwy into Cross Rd.
- The suggestion within the amended plan and details that providing these interventions is contrary to TOD / Corridor aims is not supported, as these improvements are directly attributable to the traffic generated by the proposed development (which takes into account TOD principles). While DPTI can deliver the proposed traffic signal operation modifications, the extension of the right turn lane on Anzac Hwy would need to be funded by the proponent.
- It is unclear in the amended plan and details as to whether the Marion Road / Elizabeth Avenue junction, Marion Road / Mabel Street junction, and the western-most access for the development car park on Anzac Highway are proposed to be left-in / out only. The AIMSUN modelling of these locations shows these locations as operating as left-in / out only. However, the amended plan shows these access points open to all movements. The increased traffic associated with the development would result in a greater potential for crashes to occur at the access points. DPTI considers that:
 - vehicle movements to and from Marion Road at Elizabeth Avenue and Mabel Street be restricted to left turn in and left turn out only to Marion Road by closing the median openings;
 - vehicle movements at the western most access point to the car park on Anzac Highway be restricted to left turn in, left turn out and right turn in only. Right turn out movements must not be permitted to occur in any form. To accommodate right-in movements, the U-

turn facility should be modified to prohibit U-turns from the northeast. If the design cannot entirely prohibit the above movements, the U-turn on Anzac Highway would need to be closed entirely.

- As these modifications are as a direct result of the proposed development, they should be funded by the proponent.
- The proposed bus bay on Anzac Highway is supported in principle. However, as a result of the proposed additional access point into the development on Anzac Highway, the bus bay should be relocated to be immediately downstream of the new access point (and moving the taxi rank further to the southwest, but not immediately adjacent to the other access point). The plan should be amended to show this change.
- The bus bay on Anzac Highway and the deceleration lane on Marion Road would be required to be designed to DPTI's satisfaction. Existing footpath widths around these facilities would need to be retained, and land would be required to be vested as road reserve to accommodate the footpaths.
- In relation to the central access on Anzac Highway, it appears that the angle of this access would potentially result in vehicles entering the site at a higher than desirable speed. This has the potential to impact on pedestrian safety at this location. Consideration should be given to how this issue can be managed as part of the design of the access.
- With respect to the Marion Road access DPTI recommends that the zebra crossing be removed and that the car parking between the access and the first intersecting car park aisle be removed in order to provide an unimpeded flow into the site, thus minimising the potential for vehicles to be required to queue back onto Marion Road. Similarly the three car parking spaces adjacent the Anzac Highway access should be deleted in order to minimize the potential for interference with the traffic flow through the site at this location.
- In relation to service vehicles, it is considered that the access points to/from the development should accommodate a 19m General Access Vehicle. This would ensure that the largest General Access Vehicle legally permitted to access the site can do so without any difficulty.
 - The on-site parking should be designed in accordance with the Australian/New Zealand Standard 2890.1:2004 and the facilities for commercial vehicles conform to Australian Standard 2890.2-2002.
 - Any road works required to accommodate the proposed development must be designed and constructed to the satisfaction of DPTI, with all costs (design, construction and project management) being borne by the developer. With regards to the design, the developer is required to seek approval for the concept plan from DPTI's Metropolitan Region, Senior Access Management Engineer before undertaking any works.
 - The Metropolitan Adelaide Road Widening Plan shows that a strip of land up to 4.5 metres in width may be required from the Anzac Highway and Marion Road frontages of the site, together with additional land from the Anzac Highway/Marion Road corner for the possible future upgrading of the Anzac Highway/Marion Road intersection. An additional 4.5 metres x 4.5 metres cut-off is required from the Marion Road/Elizabeth Avenue corner of the site. The consent of the Commissioner of Highways would be required
 - Preliminary investigations indicate that it is unlikely that land would be required from this development site for a potential future upgrade of the Anzac Highway/Marion Road intersection, Marion Road/Cross Road intersection, and the midblock section between the intersections.

- It is important that any signs associated with this development do not interfere with existing traffic control devices or result in distraction or confusion of motorists. Subsequently, any signs must be simple, effective and easily assimilated. Under no circumstance should signs be allowed to flash, scroll or move as this would result in undesirable distraction to motorists. Should additional signage be required, above and beyond the proposed pylon sign on Anzac Highway, these must be assessed to ensure that they would not impact on road safety, particularly given the complexity and nature of movements at this location.
- The site is located within a short walking distance to the tram, however, there are no obvious direct linkages or design references from the site to the tram stop for pedestrians or cyclists. The proposal would benefit from maximising physical connections between retail, residential and public transport, with more consideration being given to the walkability of the site as a whole. It is also noted that the footpath along the Marion Road frontage adjacent the car park ramp and access appear to be constrained and that the proposed bike racks and vegetation may interfere with pedestrian movements. Strong consideration should be given to maximising footpath widths and enhancing the attractiveness and safety of pedestrian facilities at this location (and along Anzac Highway) in order to make the environment encouraging to pedestrians.
- As previously detailed, current experience shows that pedestrians generally do not cross Marion Road at the pedestrian crossings to access the bus stops on the eastern side of the road. Rather, they cross uncontrolled and store in the existing median at this location. Given that the development would result in an increase in pedestrians at this location, it is likely that this activity would increase.
 - The interaction between the proposed development and the existing shopping complex to the north needs to be considered from a pedestrian perspective. An increase in pedestrian movements between the northern and southern side of Anzac Highway, particularly adjacent the bus stop could be expected. The impacts of the development on pedestrian movements should be considered to ensure that pedestrian safety is maximised.
- The final plans and details should ensure that sufficient secure bicycle parking and end of trip facilities are provided and that visitor bicycle parking rails are well positioned for passive surveillance. The location of secure bicycle parking for residents and employees should be indicated on the plans. The bicycle parking facilities should be designed in accordance with Australian Standard 2890.3-1993 and the AUSTROADS, Guide to Traffic Engineering Practice Part 14 - Bicycles.
- The development is encouraged to feature directional and way finding signage that indicates the short walking distance/time to the tram stop and bus stops.
- In general, the proposed development is supported. However, the issues raised should be addressed.

5 ASSESSMENT OF THE MAIN ISSUES

5.1 NEED FOR THE PROPOSAL

The DR (Chapter 2.2) and the Amendment to the DR (Section 1.7) outlines the proponent's views on why the proposal is needed and the potential benefits to the State. In justifying the development, the proponent considers the proposal would provide the following economic, social and environmental benefits:

Economic:

- As a landmark development in a prominent location it would demonstrate TOD principles and contribute significantly to revitalisation of the locality and the Neighbourhood Centre
- Retail floor space within the Plympton Neighbourhood Centre Zone currently does not meet all the needs of the local catchment in terms of choice and retail range
- Retail modelling undertaken by Consultant, Alistair Tutte confirms there is an unmet demand for shopping facilities in the area for both food and non food items
- An increase in urban lifestyle facilities including cafés and restaurants would contribute significantly to economic vitality of the area that is midway between the coast and the CBD
- It would provide increased economic activity choice and diversity for the area.
- It would create additional employment (including construction employment) and investment in the locality contributing to both direct and indirect economic benefits
- The development provides for urban consolidation that optimises efficient economic service provision, including transport efficiencies.

Social:

- The opportunity to create a focal point for the local community presently lacking in this locality by creating interactive lifestyle retailing
- Providing accommodation with serviced apartments for short term and affordable housing in the form of affordable rental (1 and 2 bedroom apartments)
- Enhancing car and bicycle parking
- Enhancing retail and leisure opportunities with the careful selection of specialist retail providers focusing on interactive involvement and coffee “meeting place” facilities
- Improving surveillance and security to address Crime Prevention Through Environmental Design (CPTED)
- Creating a visionary prominent development that defines the site and locality as the focal centre for Plympton
- The provision of an attractive sheltered mall space and environment to encourage for retail browsing and alfresco dining.
- The mall design effectively creates an internal street which enhances community connectivity and would provide an active community space given the retail/café/restaurant trading hours.

Environment:

- Management of potential noise effects through building design, orientation materials and treatments as required for plant, service areas and the like
- Using Ecologically Sustainable Development (ESD) techniques accentuated in the design, construction detail and materials used
- Enhance pedestrian and bicycle activity given the proximity to public transport and through at grade access through the development to allow easy connection to the nearby tram stop
- Incorporate best practice energy efficiency and design, water capture and reuse, zero waste principles, passive lighting, heating and cooling features and minimise heat and glare reflection
- Provision of landscaping
- A constructed development that incorporates best practice building design

- A development that is constructed and managed using the ISO 14001 Environmental Management System accreditation and thereby be compatible with the general duty of care required by the *Environment Protection Act 1993*

The DR (Summary) states that the site is strategically located and benefits from excellent access to public transport (bus and tram) and the arterial road network. It would make a positive contribution to transit orientated development and is consistent with Government Policy.

Multi-use development responds to both the *State Strategic Plan*, through the redevelopment of a key metropolitan site, as well as addressing *The 30 Year Plan for Greater Adelaide* by incorporating principles of urban consolidation and transit orientated design.

Through *The 30 Year Plan for Greater Adelaide* the State Government is seeking to facilitate ‘Transit Orientated Development’ (‘TOD’s) around high service public transport routes to better integrate land use and transport planning to deliver sustainable development outcomes.

The proposed development contributes to the intent of the Strategy in terms of its transit focus and location within a walkable distance of public transport facilities and includes some mixed-use and higher density residential development.

The neighbourhood centre is identified in *The 30 Year Plan for Greater Adelaide* as having potential for new local or neighbourhood activity with a transit focus. The location of the development enables it to maximise the use of the existing, well-serviced public transport network (and in effect improving people’s access to work and shopping).

The site has advantages that meet the principles of a TOD, including:

- The precinct is well serviced by a high frequency public transport route.
- There is existing infrastructure capacity to support the development, including water, sewer, energy, etc.
- There is likely to be market interest in the development due to its location and lifestyle choices.

The consolidation of an infill site relatively close to the city (in a strategic location) has the potential to revitalise the existing neighbourhood centre through increased residential densities, with mixed use on a major public transport route, that is generally in accordance with the Strategy.

This AR concludes that the need for the proposal in terms of a mixed use development on an under-utilised strategically located metropolitan site has been demonstrated. The location of the development and its form and function point to one of Adelaide’s first TOD’s.

5.2 URBAN DESIGN

5.2.1 SUSTAINABLE FEATURES THROUGH THE USE OF ‘TRANSPORT ORIENTATED DEVELOPMENT’ (‘TOD’) PRINCIPLES

The apartment types are such that there are serviced managed apartments (short term tourist stay and student accommodation), as well as residential apartments and affordable rental apartments. The revised proposal, with its mix of serviced and residential apartments for the general market, has meant the proposed development would have the amenities that are able to accommodate a TOD development. Regeneration of an under utilised site can act as a catalyst for neighbourhood renewal (especially with the sites strategic location on a major transit corridor), with the provision of retail conveniences in a mixed use development. The issue was raised in the submissions as to whether the proposed development should be classified as TOD. The accessibility to transport on a main transit corridor plus the higher density housing and retail facilities on an infill site justifies the view that this represents a TOD development.

Bicycle parking and facilities have been provided within the development, which also supports TOD principles.

This AR concludes that the sites potential for compact urban infill with a higher density development, which allows for the regeneration of a currently underutilised site has been demonstrated. This aligns with the current *State Strategic Plan* and *The 30 Year Plan for Greater Adelaide*, in that it is a higher density mixed use development on an existing fixed line transit corridor.

5.2.2 LINKAGES/CONNECTIVITY

The connectivity of the site and proposal to the rest of the Neighbourhood Centre, even though it is separated by Anzac Highway, is through the provision of its retail and commercial activity. Depending on the diversity of shopping provided, local people would use the centre because of its accessibility, without having to shop further afield. It is easily accessible from a pedestrian perspective, with public transport links directly adjacent the site. The bus stops on both Anzac Highway and Marion Road are '15 Minute Go Zones'. The Glenelg Park Tramway tram stop is within easy walking distance (150 metres away), which is a '20 Minute Go Zone'. Effectively there are minimal waiting periods for transport. Safe and convenient pedestrian access is provided through the site and to public transport. Specific cycling routes are located within close proximity to the site (e.g. the Westside Bikeway from Hilton- Camden Park).

Council has suggested there should be pedestrian linkages between the West Tower and the shopping centre and Elizabeth Avenue. However, in this case it is appropriate that there is a separation between the two, to allow a sense of privacy and security for both the residents of the West Tower and the existing residents in Elizabeth Avenue. It should be noted that one submission wanted no direct access from the supermarket to Elizabeth Avenue.

Concerns were also raised for the pedestrian safety of children walking through Elizabeth Avenue and Marion Road.

The site overall is considered to function effectively at a pedestrian movement level. Further to the above this AR also concludes that the external car park should be amended to incorporate direct paths for cyclists and pedestrians through the site with crossing points designed to highlight the presence of cyclists and pedestrians.

5.2.3 URBAN VILLAGE/COMMUNITY SOCIAL INTERACTION

The proposed development has the potential to become an 'Urban Village' in the combination of the residential component with mixed use development and the provision of good public transport (and the potential to reduce car reliance and to promote cycling). There is also the possibility of people working and living in the same area. Dependent on the group of people that would live in the apartments there is the potential for long term interaction that could create a sense of community. It is noted that there are no direct recreational facilities proposed on the site. A concern was also raised that the proposal would impact negatively on existing family lifestyle in the immediate locality. There is however, the potential for social interaction in the form of cafes/restaurants (for family participation) within walking distance of the local residential area.

It was also raised that there is no provision for public open space. This in some respects is due to the constraints of the site and the housing product available (apartment style living). The nearest park (St John the Baptist Catholic School), is approximately 200 metres away on Elizabeth Avenue. There is also an internal public space in the form of an internal mall and covered outside seating space.

5.2.4 INTEGRATION WITH THE EXISTING AREA

The proposed development overall is scaled sufficiently on the outer perimeters, adjacent existing residential development, although it is noted the proposed five storey (West Tower) abuts at its western most edge, a single storey dwelling (11 Elizabeth Avenue). Screening would need to be provided to maintain the dwellings existing privacy.

Initially, the proposed development would stand out due to its prominent location and height. Currently, there are no other developments like it in the suburbs of Adelaide. However, this situation will evolve with the focus on stimulating urban renewal through compact, denser urban infill, mixed use development and 'Transit Orientated Development' on transit corridors. Anzac Highway is considered to be a major transit corridor.

Given the likely change in urban planning focus, envisaged in both the *State Strategic Plan* and *The 30 Year Plan for Greater Adelaide*, the mixed use development is acceptable within the locality and adds to the mix of existing retail and commercial development, intensifying the neighbourhood centres capacity. It is also noted the area will also evolve with the focus on infill development along transit corridors.

5.2.5 COMPATIBILITY OF LAND USES WITHIN THE DEVELOPMENT

The DR (Section 4.2.1) states that measures would be taken to reduce acoustic impact on the apartments from commercial uses. There is a need to ensure that both acoustic design and operating hours address the relationship between the apartment component and the existing licensed premises (the Highway Hotel), given there could be later hours entertainment including music. The Amendment to the DR (Section 3.4.3) does stipulate that plant and equipment would be enclosed and noise mitigated through noise attenuation design measures. The shopping centre component is enclosed to a large extent, with retail areas externally facing towards the hotel away from the residential components and existing residences. The commercial component would not create adverse effects due to office related activities with hours of operation between 8.00am and 6.00pm and possibly Saturdays. The Amendment to the DR considers outdoor dining is unlikely to generate noise levels above background traffic. Noise from late night uses (i.e. the hotel), is proposed to be managed by security etc.

The proponent would need to ensure that the construction materials used are rated as per the Ministers Specification 78B for mixed use development. The specification requires that apartments within mixed use development have an appropriate level of internal sound interdependent of external noise levels. Given the location of the proposed development to primary arterial roads a high level of external noise could be expected. The design of the apartments in the Western Tower would have noise attenuation features, due to its proximity to the service road and loading area.

The AR concludes environmental noise issues would need to meet the Australian/New Zealand Standard AS/NZS2107 and the EPA Technical Bulletin, the Environment Protection (Noise) Policy 2007 and the Ministers Specification 78B regarding music noise within the development site.

5.2.6 VISUAL AMENITY /HEIGHT

The proposal is significantly higher than nearby buildings and would be visible against the skyline. The visual impact of the proposal is acknowledged within the Amendment to the DR (Section 2.3 and 3.2.1) and discussed earlier in this AR. The revised design seeks to soften the visual amenity at street level and by breaking the building envelope into a number of components has created interest at a scale and massing that transitions more successfully to the existing residences than the previous design (i.e. where the focal point was towards the centre of the site). This is enhanced further by orientating the residential components (in the East and West Towers) towards Elizabeth Avenue lessening the impact on the surrounding residential neighborhood. The RD speaks of the design having a more residential scale. The

design is contemporary and of a quality to be a landmark development for the first of its kind in the area. The higher built form has the ability to accommodate a range of uses, higher living densities and the potential to create lower energy demands due to its overall footprint.

The proposal supports State Government strategies by increasing densities and providing for multi-use functionality along key transit routes. The height of the North Tower is such that it is setback sufficiently to minimise impacts on the immediate locality. The East/ West Towers and serviced apartments are of a more residential scale. Overall there is more vertical articulation across the site than there was originally with the one tower. The overall architectural vernacular is more residential looking and not dissimilar to a number of infill developments proposed currently (i.e. the Bowden – former Clipsal site). The proposed development, when viewed from any direction would appear as a collection of buildings with varying heights. The impacts arising from this development have been carefully assessed in this AR and are considered acceptable

5.2.7 NOISE

The apartment aspect (as clarified by the EPA) is likely to have a higher outdoor ambient noise level due to the proximity of mixed uses, the hotel, music, traffic and tram noise, mechanical ventilation and general noise transmission within the building. Achieving internal noise level would rely on design and locating sleeping areas away from noise sources. The mixed use development should achieve the internal noise levels regardless of the noise source. The RD acknowledges the EPA's suggested noise criteria. The service area would be enclosed,(except for the entry on the northern side), with door/grilles to the southern side, which would provide sufficient noise attenuation to adjacent residences from internal noise associated with delivery vehicles, waste removal and general loading/unloading. The shopping centre is also enclosed and should not impact from a noise perspective. The proposed development has the potential to act as a noise barrier between the existing hotel and the existing residential properties.

The level of traffic noise at the proposed site could be quite loud and the facades of the apartments would need to be carefully designed to achieve the required dBA levels. Residential units would have attenuated glazing either thicker glass or double glazing, (depending on cost)and that the glazing treatment would be required for all bedrooms, with laminated glass for all other windows. Specific design details would need to be determined based on the proposed internal layout of apartments. Due to the mixed use, there is a need to recognise the rights of residential and commercial activities by establishing an interface that protects the amenities of both uses. The DR (Section 4.2.1) and the Amendment to the DR (Section 3.4.3) indicate that the proponent is well aware of the importance of noise attenuation for the success of the project and that treatments would need to be designed to minimise noise from both within the proposed development and from external sources (such as traffic noise).

The Amendment to the DR indicates that background noise assessment would occur prior to construction of the development being undertaken, which would inform the design and also construction. Assessment of the environmental noise issues associated with the proposed development indicates that all relevant environmental noise criteria would be achieved with the implementation of typical commercial acoustic treatments.

This AR concludes that the proposed development (if approved), must fully comply with the EPA guidelines for noise, so as to minimise the possible effects on residents both internal and neighbouring. An acoustic plan detailing acoustic treatments (noise attenuation features) would be required. The requirements of the Ministers Specification SA 78B for the control of external sound (February 2013) would need to be addressed.

5.2.8 STREETSCAPE

The Marion Road frontage appears from the revised perspective drawing in the Amendment to the DR, to be sufficiently articulated, with provision for pedestrian shelter in the form of canopies for the retail section. The landscaping shown creates additional interest and softens the hard edges of the development at street level. Elizabeth Avenue doesn't have quite the same focus as Marion Road, as it is off to one side of an arterial road. However, the expanse of walling comprising the supermarket area has been further articulated and reduced in height in the revised proposal with sufficient detailing. The facades of all the elevations would have a variety of materials and textures to provide interest and contrast and a residential quality where appropriate.

The AR concludes that the streetscape elevations proposed is adequate but could be further enhanced with additional landscaping.

5.2.9 LANDSCAPE

Landscaping has the potential to minimise environmental effects, (including the creation of an urban heat sink), through the use of intensified plantings and softening of hard edges using building design.

The landscaping shown on the perspective drawings in the Amendment to the RD, at a streetscape level for both Marion Road and Anzac Highway as well as the at grade car park appears to be sufficient and well integrated, creating additional interest to the overall development. However, further detail would need to be provided in the final design stage for Elizabeth Avenue.

This AR concludes that the overall landscape provision is sufficient and that a plan providing greater detail on the type of plant species is necessary.

5.2.10 OVERSHADOWING

Adjacent residential areas along Elizabeth Avenue and Marion Road are caught in the shadow of the proposed development from around the 3.00pm in winter, but have adequate access to sunlight at all other times. There are also adequate levels of sunlight accessible to all the apartment areas. Overall the overshadowing impacts are minimal. The positioning of the tower is such that it is setback 48 metres from the site boundaries, significantly reducing the impact overshadowing would have on Elizabeth Avenue properties.

This AR concludes that the overshadowing impacts are minimal.

5.2.11 VISUAL PRIVACY

The proponent has provided a typical internal layout showing three types of apartments, which show that habitable room windows and balconies have the potential to be screened where necessary creating a visual separation. Visual privacy may be an issue to the adjoining property adjacent the West Tower on Elizabeth Street.

This AR concludes that the visual privacy between apartments is adequate. However, the proponent should consider screening where there would be potential overlooking into the backyard of the single storey dwelling adjacent the West Tower.

5.2.12 CRIME PREVENTION

In terms of crime prevention principles within the proposed development, the DR (Section 4.1.4) and the Amendment to the DR (Section 3.2.4) indicate that they would exist in the form of adequate lighting, hotel management, security provided by security personnel and video cameras located in the car park, basement and shopping complex. The Amendment to the DR also speaks about high visibility for

pedestrian and cycle movement in and around the site and natural surveillance from the upper level apartments (due to their outlook). Natural surveillance would also occur from passing shoppers browsing and people alfresco dining in the public open space. The proposed measures would have enough effect to deter anti-social behaviour and graffiti.

The proposed development offers convenient linkages through the site for north-south movement to transport corridors. The perspective shows that significant effort is to be made to all the frontages to provide 'street appeal'.

Lighting spillage from security lighting and car parking would be managed so as not to impact on the adjacent residential properties. Car parking areas would be well lit. The DR indicates that street lighting on Anzac Highway and Marion Road already creates a well lit public environment. Lighting would be to Australian Standards.

In addition, the cafes/restaurants with frontages on the northern face of the centre would provide additional activity after hours to provide further passive surveillance. The DR states that the pedestrian movement patterns through the site provide safe and convenient access to existing transit stops.

Safety and security throughout the proposed development have been adequately addressed. Further details are required for the lighting in the basement and at the ground level car park. This AR concludes that the proposal is acceptable in respect of design to provide public safety, provided a condition is imposed on lighting of public areas.

5.2.13 MICROCLIMATE/WIND TURBULENCE

The Amendment to the DR (Section 3.4.7) states the eight storey tower (six levels above retail and a car park level) has a relatively small footprint towards the prevailing wind. The varied height of the other towers (at five storeys and four storeys respectively), are not anticipated to have an adverse affect on the surrounding microclimate due to small footprints. This being the case, outdoor dining at ground level would not be affected. The two storey podium is slightly higher than the Highway Hotel, but not enough to cause any significant impact.

This AR concludes the proposed development would not have an adverse affect on the surrounding microclimate and that any potential wind effects are likely to be minimal and the proposal is not expected to impact significantly on the current climatic conditions.

5.2.14 MATERIALS

The proposed materials for the building are precast concrete panels, glass, Austen steel, metal panels (composite) and stone facings. The design also uses timber slatted louvers for shading and screening devices. External finishes would be selected to minimise the potential for reflection glare. The roof material comprises colorbond metal sheet roofing (light in colour) with an aluminum soffit. At this stage, there are no details on the colours for the development except those shown in the revised perspectives in the Amendment to the DR. The external materials for the proposal reflect those used on the Highway Hotel.

This AR concludes the combination of materials proposed, adds further interest to the overall design and is acceptable.

5.3 SUSTAINABILITY

5.3.1 ECOLOGICALLY SUSTAINABLE OBJECTIVES/RATINGS

The proposed development would be required to meet the *Building Code of Australia –Part J – Energy Efficiency*. The DR (Section 4.1.3) states that the proponent is seeking to implement a suite of principles and initiatives to ensure ‘best practice’ design can be constructed and that sustainability principles would be the fundamental drivers of the development. In addition, the proponent seeks to achieve a 5 Star rating using the Green Building Code of Australia (GBCA) rating tool and the Multi Unit Residential V1 tool (RD Section 3.3.5) for the residential component. The RD mentions there is an expectation the outcomes would fall comfortably inside the Residential 5 Star GBCA assessment when it is released. Whilst the Green Building Council’s Retail Centre V1 tool would be used to assess the retail/commercial component.

This AR supports the level of commitment proposed by the proponent in the design of the retail and commercial component achieving at least a 5 star rating.

5.3.2 ENERGY EFFICIENCIES

Further to the above sustainability objectives, the Green Star Rating should be a standard requirement for a development of this kind. The DR (Section 4.1.3) indicates that the appropriate level of Green Star rating that would be achieved. However, both the DR and RD speak of the design being reviewed for performance through the energy cycle (both embodied and operational), resource consumption (which considers materials, water and power), waste generation (this includes construction and operation waste, plus pollution generation) and community impact (the local and wider community).

The design incorporates a number of passive design solutions and energy efficiencies through the use of north/south orientation, shading, high performance glazing, solar hot water, a ventilated glazed atrium within the mall area, waterless urinals and the use of recycled water for flushing.

This AR notes the proponent is required to meet the 5 star rating for Part J of the Building Code. The AR concludes that a Building Sustainability Plan need to be prepared to map out in detail how this requirement is to be satisfied.

5.3.3 GREENER METHODS OF TRANSPORT

The proposed development does align with TOD principles, which are defined in *The 30 Year Plan for Greater Adelaide*. The site is located within close proximity to public transport options along key arterial roads that support the potential for TOD related development. Whilst public transport is already utilised, the proposed development provides a further option that takes advantage of those transport facilities. From the perspective of providing high densities and compact development, as part of urban infill along those routes, the proposal complies with *The 30 Year Plan for Greater Adelaide*. The proposed development also offers opportunities for lifestyle choices, which allow for readily available access to transport choices that reduce the use of owner/vehicle use, which can be considered more sustainable (i.e. “greener”).

The AR concludes that the proposed development has the potential to take advantage of the proximity of existing transport choices which in turn could see a reduction in the use of owner/vehicle use.

5.3.4 WATER SENSITIVE URBAN DESIGN

Water Sensitive Urban Design (WSUD) can contribute to urban sustainability and provide the conditions for attractive, human-scale living environments through the integration of urban planning and design with the management, protection and conservation of water. This best practice approach to sustainable

management is becoming more important with water shortages and quality being of major concern throughout Australia.

The key principles of WSUD, according to the CSIRO Guidelines, are:

- Protect natural systems
- Integrate stormwater into the landscape
- Protect water quality
- Reduce runoff and peak flows
- Reduce potable water demands

The concept plan for Lower Level 1(i.e. the basement area) in the DR shows areas allocated for water storage for roof runoff from the development and possible reuse for irrigation of garden beds and the flushing of toilets. Stormwater re-use internally would require treatment to the EPA Class 2 standards.

The proposed capacity of underground storage tanks with a capacity for approximately 100,000 litres suggested by the proponent in the DR (Section 4.4.2) is to be used as a temporary or permanent storage buffer and is sufficient to service those needs.

As part of its water sensitive design management the both the DR and RD also suggests the use of informal swales as a treatment for stormwater as well as the use of gross pollutant traps, oil and plate separators and the use of first flush principles for paved areas. The RD states that the design of all paved areas shall be undertaken to ensure “first flush “principles are considered.

This AR supports the proponents desire to use sustainable measures on site for best practice water sensitive urban design and, as such, further detail will need to be provided showing exactly how the reticulation and water re-use would occur including the location of swales and any permeable paving.

6 ECONOMIC ISSUES

6.1 CURRENT RETAIL CLIMATE

The DR (Section 4.6.1) indicates that research undertaken on two separate occasions highlighted un-met retail demand within the local area. Specific issues identified in relation to the current local retail environment included :

- retail floor space within the Plympton Neighbourhood Centre Zone does not in all cases satisfy local demand, in terms of choice and retail range, for both food and non food items;
- there is un-met demand for additional urban lifestyle facilities, including cafés and restaurants; and
- through-traffic accessibility for the existing facilities is sub-optimal.

The combination of this unmet demand, increased residential density, and the longer term attractive effects mixed-use, transit oriented development would generate suggests that, whilst there would be a temporary transfer of retail traffic from other local centres, the long term retail turnover within the region would increase.

Projections in the DR suggest a current average five yearly growth in retail turnover rates of approximately 2.3%. Modelling undertaken to show the impact of the proposed development suggests that it would result in an initial decrease in food turnover growth rates in 2011 across all local centres (but no change to non-food turnover rates), before the underlying growth rate was restored in the following period – with the exception of the existing Plympton and Kurralta Park centres, which are predicted to take a longer period to recover to pre-development turnover rates in food turnover.

The modelling suggests that retail growth rates would remain the same whether the development is undertaken or not, which, in the case of the adjacent existing Plympton centre is not necessarily indicative of the beneficial effects in what a TOD development could expect. The prediction of static growth rates indicates that the development would likely emphasize enhanced competition between local retailers.

The original modelling was undertaken to reflect a retail space of 6,500m². The revised plans show a reduced floor space of 5080m². The modelling did not take into account the recently constructed Woolworths at Harbour Town. However, due to the location of that supermarket and the type of retailing that defines Harbour Town, the proposed development would be unlikely to impact upon it.

This AR concludes that at a minimum, overall regional turnover and growth rates would persist at current levels, leading to enhanced competition in the region between retailers with associated benefits for consumers. Further, there is potential for increases in both turnover and growth in the region resulting from the attractive qualities of the proposed new development.

6.2 EMPLOYMENT, ECONOMIC CONTRIBUTION AND IMPACT ON IMMEDIATE NEIGHBOURHOOD

The Economic Impact Assessment prepared to inform the DR (Section 1.1) indicates that the proposed development would involve a capital investment in the order of \$35M. The proponent states the revised cost of \$40M (for the amended proposal), which has the capacity to generate a range of direct and indirect economic benefits, (including increased public revenues at both Local and State Government level in the form of rates, land tax and stamp duty).

It is projected that the proposal would directly contribute to 234 ongoing full time jobs indirectly across different fields of employment, including retails sales, management, administration, grounds keeping, maintenance and cleaning. This is in addition to the workers employed during the construction phase.

As the proposal is mixed use, with an increased density residential component and a retail component augmenting existing adjacent facilities, it could be anticipated that the overall patronage of the Plympton precinct by the local population would increase, with resultant community benefits (including improved safety). The proposal is predicted to contribute to increased competition between retailers by providing an additional alternative shopping location, which should benefit consumers. It should also promote further increases in population density and retail redevelopment around what is a relatively significant transport juncture, supporting the TOD principles, and potentially further increasing patronage of the public transport system.

The Amendment to the DR (Section 1.7) calculates that the proposed development has the capacity to provide ongoing residential accommodation for some 200- 250 people. The mix is likely to include singles, couples and families. This is likely to increase demand on local services (including the limited range of existing recreational and community facilities). Whilst the initial focus was on serviced apartments (temporary occupation), the focus is now on mixed residential opportunities that are more for permanent occupation (including families).

This AR concludes the proposal would have a positive employment effect.

6.3 COMMUNITY FACILITIES

The DR (Section 4.6.3) states the demand for community facilities would be minor, due to the short term stay accommodation originally proposed that tends towards a transient group of people who are less likely to bond or want to create community. Therefore, demand for community facilities is not there. The revised plans in the Amendment to the DR now show long term residential apartments as part of the accommodation, but with no further additional community facilities.

The Amendment to the DR (Section 3.7.4) states that the proposed development with the different accommodation types could contribute approximately 180 permanent residents and 26-52 transient residents (from the serviced apartments). However, with the change in accommodation types there is still unlikely to be a high percentage of resident children. Thus recreation facilities, for children are not required. Nonetheless, there is the probability that health, educational and cultural services could be utilised by the occupants of the residential apartments and could affect local services.

The DR mentions throughout, the convenience of public transport facilities to the CBD and Glenelg and the easy access to a wide range of higher order services, if required.

The proposed development is more likely to create an activity hub with cafes/restaurants which would encourage community lifestyle activity on a daily basis. The DR notes the Highway Hotel is already a community focal point.

Due to the scale of the proposed development and the type of accommodation provided, community lifestyle activity is more likely to occur. The DR originally described the apartments as only serviced apartments. The revised plans in the Amendment to the DR show a mix of short term stay, residential apartments and affordable housing rental, providing a mix of housing product for a more diverse range of lifestyles. The refinement further supports the notion of the proposal as a 'Transit Orientated Development'.

7 TRAFFIC AND VEHICLE MOVEMENTS

7.1 TRAFFIC GENERATION

The DR (Appendix C) provided an assessment of the traffic impacts and outlines the potential traffic increases as a result of the proposal.

The Traffic Impact Statement (TIS) indicates the existing hotel and bottle shop would continue to generate an amount of traffic on the road network. The traffic calculations for traffic generation have had a 20 percent discount applied to them due to the proposed development having a TOD focus and that users of the site would arrive by other means of transport due to the close proximity to public transport.

The proponent was requested by DTEI (now DPTI) to supply specific AIMSUN modelling further to the TIS and to increase support for public transport use. A number of matters were reconsidered from the original design with the revised proposal showing:

- a redesigned car park;
- access points utilising the existing entry/exit points;
- increased aisle length to the basement car park off Marion Road (i.e. to accommodate queuing);
- removal of the stacked parking loop; and
- the provision of dedicated one way service vehicle access and egress.

The majority of residential traffic is now separated from other visitors to the site.

The traffic modelling used a base case of observed traffic conditions from 2011 and a projection for future traffic impacts for the year 2016 (refer to Amendment to the DR 3.3). Morning peak traffic generation showed no significant difference between the two models. However, in the afternoon there is an increased delay for Marion Road on the northern approach extending through to Mooringe Avenue. Anzac Highway was also delayed in the westbound direction through to the eastbound direction on Cross Road with right turn from Anzac Highway into Marion Road. Through movements in relation to Marion Road and Anzac Highway had some queue build-ups with enough gaps for traffic to keep flowing.

The Amendment to the DR predicts there to be minimal delays from the proposed development to the arterial roads, with sufficient gaps, without hindering traffic flow on Marion Road for vehicles to access Elizabeth Avenue. The Amendment to the DR states that the base model operated close to capacity with only minor fluctuations in demand which may result in some congestion and delay (and further implied that this may encourage people to rethink their travelling mode and making sustainable changes). Similar issues were raised in the submissions regarding further congestion occurring within the local road network. This would be exacerbated further if access was poor to the site from Anzac Highway and Marion Road. Council believes that whilst this may not result in over capacity issues it would still require traffic mitigation measures. As per Council's suggestion the service times for delivery vehicles would need to be conditioned (should it be approved) to lessen the impact on those residences adjacent and opposite the site.

The Amendment to the DR indicates that, in terms of traffic generation, the staggered usage would occur due to the nature of the proposed development. The supermarket would be open until 9.00pm on weekdays with the cafes and restaurants later still, and the hotel even later. The centre would be used outside of the arterial road peak periods.

A number of intervention treatments to mitigate the potential impacts include an extension to the right turn lane from Anzac Highway onto Marion Road, that Marion Road/ Mabel Street be left-in /left-out only and to increase the phase times for right turn movements from Anzac Highway onto Cross Road. The Amendment to the DR (Section 3.3.1) states that providing these interventions is likely to be a disincentive for people to use public transport which is contrary to 'TOD' aims. However, it should be

noted that the proponent has agreed to implement a number of treatments once the proposed development is completed.

DPTI supports the relocation of the bus bay on Anzac Highway in principle. Existing footpaths around the bus bay and the deceleration lane on Anzac Highway would need to be maintained.

There were concerns by adjoining residents that Elizabeth Avenue would be used as short cut to circumvent the intersection traffic signals, due to the additional traffic created by the proposal. There were also concerns with the traffic generated by the proposal impacting on the school in Elizabeth Avenue. The Traffic Impact Statement determined that peak traffic from the proposal would not coincide with the school drop-off and pick-up times. Some congestion was observed at the school site which is typical during peak periods and only for a short time. The road is of a width that parking on both sides of the road and vehicle passing can be undertaken adequately. It would appear that any additional measures to control /prevent additional traffic in Elizabeth Avenue would need to be undertaken by Council (i.e. as an area wide strategy), so that traffic is not moved from one area to another. It should be noted these traffic concerns already exist at certain times. The Amendment to the DR states that Elizabeth Avenue has the capacity to carry the minor additional traffic created by the proposed development.

This AR considers that the operation of the proposed development would generate an increase in the amount of traffic on the existing network. Due to the intensification of the site, an increase in traffic would be expected, but the staggered usage due to trading hours spreading demands outside of the arterial peak periods indicates that potential increases could be managed. Traffic generation would be to and from both Anzac Highway and Marion Road with increased traffic directed onto Elizabeth Avenue. Due to congestion along Marion Road, it is acknowledged that the Marion Road exit would not always be free flowing. However, given there are options to exit via Anzac Highway, queuing may not be an issue. More detail in terms of traffic management and interventions (should the proposed development be approved) would be subject to proposed conditions as given by DPTI.

7.2 CAR PARKING

The revised proposal provides 448 car parks where originally there were 547 car parks; including the shopping centre, Highway Hotel and both residential and serviced apartments. The reduction in retail space/supermarket area and the number of apartments has enabled fewer car parks to be required. A parking assessment is provided in the Amendment to the DR (Section 3.3) and uses, as a calculation tool, a reduction rate of 20% was applied to the overall demand for the supermarket and hotel which takes into account the different operating times and multiple use visit to the site. The supermarket and hotel at this reduced rate would require 125 and 144 car parks with total car parking for all the land uses as being 447 (with 448 provided) . As 'Transit Orientated Developments' are a new form of development in this State, there is no prescribed car parking rates within the Development Plan to deal with them. The Amendment to the DR states that the rates were adopted from the DPTI Planning Policy Library. The parking ratios are satisfactory, if the development comprises 108 apartments (which includes 26 serviced apartments). As a general rule, serviced apartments generate less demand for car parking. If the apartments were to be all owner/occupied, then extra car parks would be required.

The existing hotel, at certain periods (primarily in the evening between 6.00 - 9.00pm)) would require substantial car parks. Overlap would occur between the shopping centre and the hotel during late night shopping. A number of submissions (including Council) have raised the issue that there is a lack of alternative parking in the immediate locality and parking in adjacent streets is already close to capacity due to the increased use of trams . Therefore any shortfall from the development would impact on the adjacent residential area. Council's calculations show an estimated shortfall of 66 car parks in the Saturday peak period. There is no indication within the DR or the Amendment to the DR as to any shortfall occurring. The Amendment to the DR (Table 3.3.5) provides justification for the numbers of car parks provided given the different types of land uses and the differing hours of operation. The Amendment to the DR states that 2 % of car parking has been provided (as per the Building Code of Australia) for persons with a disability.

A total of 156 bicycle parking spaces are now proposed, which is more than the 56 bicycle parks for the original proposal. The Amendment to the DR (Section 3.3.7) stipulates the type of bicycle parking rates used and therefore the proposal generates a demand for 92 bicycle parking spaces. The provision of 156 bicycle parks is more than adequate. There are utility areas for each residential tower, but only one utility area shows storage area for owners' bicycles. The bike parks are located across three locations adjacent the ground level car park.

Given the access to public transport options, the differing hours of operation for the Hotel and the shopping centre, as well as differing peak periods, this AR concludes the amount of car parking is satisfactory. Car parking dimensions would need to comply with the relevant Australian Standards.

7.3 ACCESS/EGRESS

Access to the retail car park has been divided between both Anzac Highway and Marion Road. Thus, the traffic generation onto the site should be evenly distributed. The apartment access is from Elizabeth Avenue for both the East and West Towers (i.e. first level/commercial/residential and serviced apartments). Service delivery trucks would exit from Elizabeth Avenue. Traffic control measures would be put in place to control the exit/access movements of both the trucks exiting the site and the vehicles to/from the apartments. Loading docks are accessed via Anzac Highway with a one way service route that exits via Elizabeth Avenue (and one waiting bay proposed along the western kerb line before the retail loading bay). There is sufficient turning area for a 12.5m rigid vehicle and 14m semi-trailer to reverse into the supermarket and retail loading zone. All vehicles would leave in a forward direction via Elizabeth Avenue.

The DR (6.3.2) and the Amendment to the DR (Attachment 3) state that as part of the development, kerb widening would be undertaken to increase the radius of the curve at the exit point to allow semi trailers to negotiate the left turn out of Elizabeth Avenue. DPTI supports this. A kerb extension is proposed to prohibit trucks turning right into Elizabeth Avenue. DPTI believe the access points to/from the site should cater for a 19 metre length general access vehicle. The RD (Section 4) indicates that notwithstanding, the design would enable a 19 metre vehicle to manoeuvre into the location designated as the loading bay by nosing into Elizabeth Avenue and reversing into the dock.

The DR (Section 7.1) indicates that a right-out turn from Elizabeth Avenue is not appropriate given the current queues from traffic signals, and that a right turn-in is also not appropriate in proximity to the Mabel Street access. Further to that, the DR indicates a possible solution would be to close the median gap to prohibit a 4-way intersection occurring. DPTI has advised that in the interest of road safety and efficiency, the median opening that enables access/egress to Marion Road from Mabel Street and Elizabeth Avenue be closed. The RD (Section) indicates that full vehicle movements at Elizabeth Avenue are considered to be essential. The proponent, post completion of the proposed development has indicated he would agree to close the median at that particular junction dependent on confirmation of the necessity.

Left in/left out access only are proposed to be provided to the car park from Anzac Highway and left in only from Marion Road.

The DR suggests the relocation of the gap in the median strip on Anzac Highway be utilised for right turn entry traffic. However, DPTI does not support this. Existing lanes have been proposed as deceleration lanes for traffic entering the site. Trucks entering the site could potentially slow traffic behind them, creating queues that could extend into the intersection during peak periods. The DR states delivery movement is early in the morning, which could coincide with peak periods occurring from 7.30am onwards.

This AR concludes that the access proposed from both Marion Road and Anzac Highway is satisfactory. More detail is required in terms of the type of semi trailers using the service route

through the site. Whilst the DR states it is a 14 metre vehicle, DPTI has advised it is more likely to be a 14.9 or 19 metre vehicle for service deliveries to the supermarket. As such, the access/loading/unloading and exits would need to be able to accommodate this. The number of vehicles turning right from Marion Road onto Elizabeth Avenue to access the serviced apartment car park is not considered to be significant.

The intensification of the site has the potential to create further exacerbation of vehicle movements trying to turn right from the site through the median access (which is illegal) onto the north bound side of Anzac Highway and, as such, there should be modifications to the section of median in question. This should be a condition of any approval.

7.4 SERVICE VEHICLES

The proposed development provides a loading and unloading area within an enclosed service dock that is accessed via Anzac Highway through the rear of the development, exiting at Elizabeth Avenue. The DR (Appendix C Section 7.2) anticipates that smaller rigid trucks would access the site several times a day. Deliveries are proposed to occur in the morning from 7.00am (i.e. before opening trading hours), with no after hour trade deliveries proposed. The frequency of the larger trucks depends on the retail outlets within the development. Both the DR and the Amendment to the DR state that, as there is a supermarket as part of this development, larger articulated trucks would be frequenting the site on a daily basis but not the 19m trucks as suggested by DPTI.

Should service truck movement not be accommodated by the existing access and egress widths, as well as sufficient loading and unloading area, the proponent would need to negotiate a revised design or use smaller service vehicles.

This AR concludes that service vehicle access is acceptable for a 14.1 metre semi trailer only. Amenity impact on those residents at the rear of the development in terms of traffic impacts are considered acceptable, as the service route is contained within an enclosed area. In order to further mitigate any impacts from delivery, times of vehicles delivering to the site should be further controlled.

8 INFRASTRUCTURE

8.1 EXISTING PUBLIC UTILITY SERVICES

The DR (Section 4.4.1) states that all required infrastructure services would be connected to the site as follows:

- Gas: A number of gas pipes run adjacent to the site through Marion Road, Anzac Highway and Elizabeth Avenue. A new gas connection is proposed from either Elizabeth Avenue or Marion Road.
- Water: A new metered domestic water connection is proposed from Marion Road, with a separate un-metered connection specifically for fire services to the site.
- Sewer: Sewerage disposal is likely to be via the Marion Road connection.
- Electricity: Whilst a padmount transformer has been considered for the supply of electricity to the site, its location would be dependent on ETSA network requirements.
- Communications: The location of the fibre telecommunication service requirements has not been determined. However, the DR indicates that the availability of existing services should be sufficient to supply.

This AR concludes that existing utility services can be adapted to service the needs of the proposal.

8.2 STORMWATER IMPACTS AND REUSE

The proposed site is currently used for commercial and residential purposes (and associated car parking) with a large area of hard impermeable surfaces. Run-off from the site is discharged to the drainage network associated with adjoining roads. The establishment of the site into a large retail and residential development would not substantially change the run-off characteristics of the site. The redevelopment of the site would provide an opportunity to harvest stormwater and to reduce the volume of run-off discharged to the drainage system (which would help reduce downstream flooding potential and ultimately discharges to the marine environment).

The DR (Section 2.2) states the proposal would incorporate best practice water capture and reuse. The DR (Section 4.1.3) further states that emphasis would be given to achieving maximum credit points (i.e. under a 'Green Star' tool) for low potable water use, low energy consumption and minimised maximum demand.

The DR (Section 4.4.2) details water collection and management aspects. Particular emphasis is placed on Water Sensitive Urban Design (WSUD) principles and integrated urban water cycle management, including water supply, sewage and stormwater management and sustainability. Potential stormwater treatments that could be implemented include:

- Permeable paving.
- Underground storage tanks.
- Informal vegetated swales (including external landscaping beds and general garden areas).
- Gross pollutant traps and oil/plate separators.

Harvested stormwater would be suitably treated and used for irrigation of landscaping/plantings and for internal building usage (i.e. toilet flushing).

In accordance with Council policy, the proposal would be designed to limit the post development 100 year ARI stormwater discharge to a 5 year ARI pre-development discharge. The DR states that, due to an inability to capture 100% of stormwater (i.e. detention would not suffice), initial flows would be discharged to underground drains along Anzac Highway and Marion Road (limited to a peak discharge of 20 l/s).

The proposed development would be designed to prevent the inflow of stormwater floodwaters (especially for the basement level), primarily through the use of careful grading of external areas to create levees and bunds.

The Environment Protection Authority (EPA) advised that it supports the proposed use of WSUD measures to manage stormwater and recommended that the recently released *Water Sensitive Urban Design Technical Manual for the Greater Adelaide Region* (Department of Planning & Local Government, July 2009) be used in the planning of the proposal. Further clarification was required on the proposed discharge of initial stormwater flows (i.e. to the existing drainage system or to infiltration swales).

The City of West Torrens advised that, in addition to the above mentioned Manual, the WSUD requirements in the West Torrens (City) Development Plan should be addressed, given that the DR provided little information as to how these would be met. In addition, Council requested that its City Assets Department be consulted in order to establish an effective and well integrated stormwater management system, especially given that run-off is proposed to be discharged to the Council stormwater network.

The Amendment to the DR (Section 3.4.4) states these issues would be reasonably managed and would be addressed during the design and documentation phase.

This AR considers that, if the proposal is approved, a detailed Stormwater Management Plan would need to be prepared. The Plan would need to address:

- **The run-off characteristics of the completed development**
- **Design requirements**
- **Implementation and construction**
- **Management, maintenance and monitoring aspects.**

The design of the stormwater management network would need to be based on run-off calculations for each sub-catchment for a range of rainfall events, using a suitable computer modelling program, (such as MUSIC). The *Water Sensitive Urban Design Technical Manual for the Greater Adelaide Region* (Department of Planning & Local Government, July 2009) should be used for determining the most appropriate range of stormwater management measures and devices that should be adopted. The Plan would need to be prepared in consultation with the City of West Torrens and the EPA. Stormwater management during construction would need to be included in the CEMP. Stormwater quality will need to comply with the *Environment Protection (Water Quality) Policy 2003*.

8.3 WASTE REMOVAL/RECYCLING

The Amendment to the DR (Section 3.4.5) states that residential waste would be stored in 660 litre garbage bins located on the first floor, with 10 bins for general waste and 2 for recycling. In terms of collection for removal of waste, these would be moved to the ground floor loading area via the goods lift for commercial removal on a weekly basis. The RD shows revised plans with the waste receptacle locations for the different components.

There are two systems, one for the residential tenants and one for the commercial tenants with a dedicated waste management system. However, there will be communal bins for recyclables with residual waste being managed by a third party provider. The RD (Section 4) states that it is not proposed to rely on Council's three bin system and that businesses would be encouraged to consider green purchasing to minimise waste reduction.

Retail and commercial waste would be stored in bulk bins and a compactus in the loading/unloading area, with removal on a daily basis. Paper and cardboard recycling would be removed weekly as a minimum. Recyclables would be separated according to type. The storage area is fully enclosed, reducing the noise impact, and with regular hygiene management by the supermarket and property owner odour should not be an issue.

This AR concludes that further detailed information be provided and that to this end the proponent seek guidance from Zero Waste in regard to recycling for the retail sector and that the Management and Materials elements of the Green Star Rating Tool for Residential Centre and Multi Unit Residential Rating Tool V1 be used to undertake the design of the development (i.e. as a reserve matter).

8.5 VENTILATION SYSTEMS

Large ventilation systems would be required for the car park and commercial kitchens. Ventilation fans servicing the car park and restaurants should contain proprietary acoustic attenuators and acoustically rated service risers. This would enable the noise from the ventilation systems to be controlled to comply with the *Australian/New Zealand Standard AS/NZS2107* and the *Environment Protection (Noise) Policy 2007*, so there would be no adverse impact to the proposed serviced apartments and at existing residences nearby. The Amendment to the DR acknowledges the requirement to comply with the *NEPM (Air Quality) Measures 1998* and as the development (i.e. the residential component) is located between two main arterial roadways.

The Amendment to the DR speaks of fixed open ventilation below the raised podium of the supermarket and retail spaces and would vary around the site from 500mm to 1200mm depending on site contours. It is not clear whether this is to discharge fumes or to bring fresh air into the basement level. Supplementary ventilation (to meet AS 1668) may be required if the natural ventilation is insufficient. Air ventilation intake location within the car park is not shown on the plans. The location of the ventilation would be addressed at the detailed design phase.

The café exhausts would be provided in accordance with AS 1688 with specific exhaust shafts the location to be determined during the detailed design phase.

It is not stated what the noise impact may be from the ventilation systems on pedestrians and adjacent houses or businesses adjacent the development.

This AR concludes that further detail is required regarding the intake vents for the car park. The air ventilation intakes would need to ensure that no road side traffic vehicle exhaust is introduced into the basement areas. Air monitoring will need to be included in the DEMP and the CEMMP.

8.6 ODOUR RESTAURANTS/ CAFES

The DR advises that kitchen exhausts servicing the restaurant/café areas are to discharge at the roof level for the dispersal of fumes. It is not clear what roof level this would occur at with the location to be determined at the detailed design stage. The fumes would need to be ventilated away from the serviced apartments and nearby residential properties to minimise any potential impacts. The Amendment to the DR states that odour exhausting would be designed according to AS 1668.

The design of any ventilation system would need to be to Australian Standards. The Australian Standards are implemented through the Building Code of Australia as well as the *Public Health Act 2011* as part of the Building Rules Certification process if the proposal is approved.

9 HAZARDS

9.1 ADELAIDE AIRPORT/HEIGHT RESTRICTIONS

Adelaide Airport has operational height restrictions for development exceeding 15 metres. Based on the site levels and the airport site levels, the permissible maximum height allowable for the Obstacle Limitation Surface (OLS) was 48.5 metres (AHD) and for the PANS-OPS surface was for 62.5 metres (AHD). The proposed development height is 33.4 metres OLS and 47.5 metres PAN-OPS.

The height of the proposed development satisfies the Adelaide Airport Ltd height restriction requirements. Prior to construction commencing the proponent would need to submit an application to the airport in regard to crane operations on the site. Lighting would need to conform with Airport restrictions and be shielded from aircraft flight paths.

9.2 SITE HISTORY DOCUMENT

Whilst the DR did not specifically address site contamination, a separate Document by GHD - *Phase 1 Site History (May 2009)*, provided a desk top study on previous uses of the site and potential contamination sources. The Document concluded that the highest risk to the development could be from potentially contaminated groundwater (i.e. hydrocarbon vapours) that may have migrated from nearby service stations. The Amendment to the Report (Section 3.4.6) speaks of previous geotechnical work by Coffey Geotechnics in 2008, where boreholes were drilled to a depth of 19.35 metres, with the report giving no indication of contamination in the form of indicators such as odours, staining, ash, cinders or buried waste.

The EPA advised that, given that a potentially contaminating activity has occurred or is suspected, a site contamination auditor should be employed to assess the suitability of the site for the intended uses (in accordance with the Planning SA *Advisory Notice 20 (Site Contamination)*). The Amendment to the DR states that investigations would be done on the site, including testing of excavated material, with the reports of the investigation being provided to the appropriate authorities.

The DR (Section 4.5) states the demolition of existing buildings is unlikely to involve the removal of asbestos. However, if asbestos is found, it would be removed in accordance with all statutory requirements and EPA guidelines (i.e. as addressed in the proposed Construction Environment Management Plan). In regard to earthworks across the site, a geotechnical analysis would be undertaken during the detailed design stage to identify any potential contamination and management requirements.

The EPA advised that any asbestos or asbestos containing materials must not be processed or reused on-site. Such materials must be identified during demolition and be transported by a licensed waste transporter to a licensed waste depot. Hazardous materials, as listed in the National Occupational Health and Safety Commission Guidance Note for Determining and Classifying a Hazardous Substance [NOHSC:30011 (1991), must be treated and removed in accordance with the requirements of the Worksafe Australia “Code of Practice” and any other Act or Ordinance in South Australia.

This AR concludes site contamination impacts would be adequately managed through the CEMP and the relevant EPA guidelines.

10 CONSTRUCTION AND OPERATIONAL EFFECTS

10.1 DEMOLITION AND CONSTRUCTION NOISE/ HOURS OF OPERATION

The proponent acknowledges the EPA's suggested noise criteria. Demolition and construction activities would affect noise sensitive land uses in the adjacent areas. The RD states that background noise assessment would be undertaken prior to construction and would inform both the design and construction plan. Noise monitoring would occur in the construction phase and would be outlined in the Demolition Environment Management Plan and the CEMMP. Measures should be taken by the proponent to reduce noise from such activities during the day, in accordance with the Environment Protection (Noise) Policy.

Noise generating activities from construction, excavation and demolition would take place between 7am-5pm Monday to Saturday. Building construction would comply with the Building Code of Australia requirements for noise transfer between occupied spaces.

This AR concludes a site Construction Environment Management and Monitoring Plan is required to ensure the design meets the requirements of the Environment Protection (Noise) Policy 2007.

10.2 AIR EMISSIONS

Managing dust during operations would be undertaken by the contractor. Generally water would be recycled for dust suppression. Air quality and odour monitoring would be achieved as per the site Demolition Environment Management Plan (DEMP) and the Construction Environment Management and Monitoring Plan (CEMMP). Monitoring would occur within the site and at identified sensitive receptors. Wind modelling would be used to identify the distribution of particulates and odours, with a survey to be done identifying surrounding industries and their potential affect on the site. The occurrence of incidents would be appropriately managed to mitigate/minimise impacts. The proponent also notes the EPA requirements about the design of development, having regard to the proximity of the residential component between two arterial roadways.

The AR concludes that a CEMMP is required to provide greater detail regarding how the site is to be developed. The contractor would need to meet the requirement to comply with *NEMP (Air Quality) Measures 1998*. Sediment management would be specified in the CEMMP.

10.3 GROUNDWATER

The DR did not specifically describe the groundwater characteristics under the site, although the *Phase 1 Site History* (GHD, May 2009) Document comprised a desktop study of the site, which states that the Hindmarsh Clays underlying the site typically contain shallow aquifers within sand and gravel lenses. Drill hole data from within 1 km of the site indicates that depth to the water table ranges from 2 – 15 m below ground level and is of a quality that could be used for domestic purposes, such as irrigation. Groundwater flow direction was inferred to be in a south-westerly direction.

The Document identified a risk of hydrocarbon pollution from previous and existing service stations in the area. The EPA confirmed that an old service station site (i.e. upstream from the groundwater flow direction) has contaminated the groundwater, which would need to be further addressed. The excavation of the basement car park and excavations for infrastructure have the potential to infiltrate useable aquifers or contaminated groundwater and would need to be suitable managed, especially if dewatering is required during construction. Dewatering could potentially have short term effects on local bores (if present within the zone of influence), which would need to be further investigated and addressed.

The Amendment to the DR indicates an intrusive investigation would be undertaken to prove that the site is fit for the proposed uses or to determine required mitigation measures. The EPA seeks further clarification about groundwater levels. The RD (Section 4) states that as per the geotechnical investigations that ground water is located 3 metres plus below ground level and that at this stage dewatering is not anticipated. This matter would need to be addressed in the CEMMP.

The AR concludes that a detailed CEMMP is required that addresses groundwater levels.

10.4 CONSTRUCTION IMPACTS/PUBLIC SAFETY

The site is currently occupied by three shops, three detached dwellings, three residential units and sealed car parking areas that would need to be demolished/removed, prior to construction works commencing. Safety hoardings (i.e. solid fencing) would be erected around the construction zone, with suitable footpath access, for public safety. Normal construction hours (i.e. 7.00am – 5.00pm Monday – Saturday) would be followed.

The main impacts on the Highway Hotel, nearby residents and the local community are expected to be:

- dust, which would be controlled mainly through watering (using harvested stormwater where possible) and street sweeping machinery
- noise and vibration, which would be controlled by using appropriate machinery and be limited to within construction hours (in accordance with all relevant standards and EPA Guidelines)
- waste sources (mainly litter and hazardous materials), which would be suitably collected and disposed of (in accordance with all relevant standards and EPA Guidelines)
- storage and use of chemicals and fuels (i.e. potential for spills and air emissions), that would be undertaken in accordance with standard legislative requirements
- construction vehicle traffic – impacts on operation of arterial road network

A Site Construction Plan, to be prepared by the successful contractor, would be implemented in order to manage construction activities and impacts, including:

- traffic controls
- dust control
- noise and vibration
- waste management
- storage of chemicals

The EPA advised that particulate impacts during both demolition and construction works would need to comply with the guidelines in Schedule 2 of the *National Environment Protection (Ambient Air Quality) Measure 1998*. In addition, demolition and construction noise would need to comply with Part 6, Division 1 of the *Environment Protection (Noise) Policy 2007*. The Amendment to the DR (Sections 3.4.2 and 3.4.11) and the RD (Section 4) states that the NEPM Measure would be complied with. In addition, air quality monitoring would be undertaken to minimise the impact of air emissions on nearby sensitive receptors (i.e. in accordance with a CEMP and DEMP).

The EPA also advised that demolition and construction waste should be segregated on-site to enable the removal and transport of waste to appropriately licensed resource recovery centres. It was recommended that a Waste Management Plan be included in the CEMMP to address on-site reuse and off-site disposal of wastes, in accordance with the EPA Waste Management Hierarchy. Waste stockpiling and storage should be undertaken in accordance with the EPA *Guideline for Stockpile Management*. The reuse of waste and waste soil as fill should be undertaken in accordance with the EPA draft *Guideline : Waste derived fill Protocol for the production and use of waste derived fill*.

The City of West Torrens requested that, due to the scale/prominence of the proposal and the impacts on Council infrastructure (especially stormwater networks); it should be consulted on the formulation of the CEMMP.

This AR concludes that a Construction Environmental Management and Monitoring Plan be required, that addresses the full range of construction impacts. A Waste Management Plan would need to be prepared and included in the DEMP and CEMMP.

10.5 STAGING

The Amendment to the DR (Section 2.9) speaks of the proponent wanting to develop the proposal in 3 stages as follows:

- **Stage 1** comprises the basement car park, both the East and West Towers, the ground floor supermarket and ground floor retail, commercial tenancy and first floor car park. Stage 1 is targeted for completion by 2016, although the East and West Residential Towers are to be completed by June 2014.
- **Stage 2** comprises the serviced apartments. Stage 2 is targeted for completion by 2018.
- **Stage 3** comprises the North Tower apartments. Stage 3 is targeted for completion by 2021.

Stages 2 and 3 may be undertaken as one stage.

The proponent has articulated a staging plan over seven years. Any staging of the proposed development will need to be carefully managed to maintain operations on-site and neighbouring and onsite residents. These impacts will need to be managed through the CEMMP.

10.6 CONSTRUCTION ENVIRONMENTAL MANAGEMENT AND MONITORING PLAN (CEMMP)

The DR (Section 4.5) includes a draft Construction Plan/Environmental Management Plan (CP/EMP) that outlines how construction and operational activities and impacts would be managed, including :

- dust control and sediment management
- noise and vibration
- waste management
- hazardous materials, storage of chemicals/fuel and site contamination

A final CEMP would be prepared as part of the construction contract.

The CEMP and DEMP would need to be prepared in consultation with the City of West Torrens and the EPA.

11 OPERATIONAL EFFECTS

11.1 HOURS OF OPERATION OF RETAIL/COMMERCIAL ACTIVITIES

The DR does not provide any specific details regarding the operating hours of the proposed development, other than the shopping centre opening till 9.00pm on a Thursday night, which is typical of suburban centres within Adelaide. The Hotel has extended trading hours currently to 4.00am the following day Monday through to Sunday (excepting Good Friday and Christmas Day which is to 2.00am).

It is presumed the shopping centre would operate seven days a week with opening hours in accordance with the hours provided for under the *Shop Trading Hours Act 1997*. The Amendment to the DR (Section 2.8) indicates cafes and restaurants may trade later, subject to licence conditions.

The AR concludes that the hours of operation are similar to other similar centres within metropolitan Adelaide and therefore within the boundaries of what residents could be expected to experience.

11.2 OPERATIONAL ASPECTS

Whilst the DR contains a CEMP, it does not address the management and monitoring of ongoing operational effects. Thus, an Operational Environmental Management & Monitoring Plan (OEMMP) would need to be prepared that addresses the following matters:

- Stormwater management infrastructure (including performance and maintenance aspects).
- Noise emissions.
- Traffic impacts.
- Landscaping.
- Sustainability measures (including implementation/compliance and performance aspects).
- Crime prevention.

The AR concludes the OEMMP should be incorporated into the proposed ISO 14001 Environmental Management System approach/framework. The OEMMP should also be based on an adaptive management approach that considers future strategies for mitigating operational impacts.

12 CONCLUSIONS

The proposal has evolved through the assessment process, to reflect further details submitted by the proponent, and in response to community and agency concerns.

Changes made by the proponent, and those recommended in this Assessment Report, deal with a more reasonable type of development that is more aligned with Transport Orientated Development than the original proposal.

This assessment concludes that:

- The mixed use development would create economic and employment benefits,
- The development would strengthen retailing and existing land uses within the existing Plympton Neighbourhood Centre.
- The development would provide lifestyle opportunities with public transport options on a major transport corridor.
- The traffic and parking arrangements are acceptable.
- While the building exceeds Development Plan height limits and setbacks, the impacts arising from the additional height are acceptable.
- The intensification of the site in terms of urban infill development adjacent a transport corridor is acceptable.
- The development has adopted suitable sustainability initiatives.

This AR concludes that the proposal is worthy of approval, subject to additional information requirements and conditions set out in the next part of this AR.

13 GLOSSARY

The 'Act'	<i>Development Act 1993 and Regulations</i>
AHD	Australian Height Datum
AR	Assessment Report
CEMP	Construction Environment Management Plan
CEMMP	Construction Environment Management and Monitoring Plan
DAC	Development Assessment Commission
DEMP	Demolition Environmental Management Plan
DR	Development Report
EPA	Environment Protection Authority
ESD	Ecologically Sustainable Development
GBCA	Green Building Council of Australia
NEPM	National Environmental Protection Measure
OLS	Obstacle Limitation Surface
RD	Response Document
TIS	Traffic Impact Statement
TOD	Transport Orientated Development
WSUD	Water Sensitive Urban Design

14 RECOMMENDATIONS

This Assessment Document concludes that the proposed Plympton Mixed Use Development on the corner of Anzac Highway/Marion Road at Plympton is acceptable, following the changes made by the proponent in its Response Document. Should the Governor approve the proposed development, the following reserved matters, conditions and notes are appropriate:

PART A: RESERVED MATTERS

The following are the matters reserved for further assessment:-

- (a) Detailed design plans and drawings for all structures on site for approval by the Minister for Planning. The final designs plans and drawings must show the layout of the structures on the site cross-sections, as well as elevations and drawings for each component of the development and the sustainability measures proposed by the proponent.
- (b) A Building Sustainability Plan that includes details of the objectives and measures to be implemented to achieve energy and water efficiencies, the use of recycled materials, minimisation of emissions, and waste minimisation/recycling for the proposed development. This would need to be shown on the plans and elevations where applicable. The Plan must include targets and measures, as well as an analysis using a Green Star Rating Tool;
- (c) A legally binding agreement, under Section 57 of the Development Act 1993, between the proponent and the Minister for Housing and Urban Development (or his delegate) dedicating a portion of the residential apartments to the provision of affordable rental housing, such that 15% of the total residential development will meet the ‘affordable housing criteria’, as determined by the Minister in Regulation 4 of the South Australian Housing Trust Regulations 2010 (as amended by further notice from time to time). A Plan shall be prepared, to the reasonable satisfaction of Renewal SA, for the development showing the proposed location of the 15% of dwellings that will meet the affordable housing criteria;
- (d) A Waste Management Plan for each component of the development, prepared to the reasonable satisfaction of Zero Waste, the Environment Protection Authority and City of West Torrens Council;
- (e) A Developer Agreement with the Department of Planning, Transport and Infrastructure for the required works. The works shall include (but not be limited to) the following:
 - (i) Vehicle movements to and from Marion Road at Elizabeth Avenue and Mabel Street be restricted to left turn in and left turn out only by closing the median openings on Marion Road. As part of this work, the right turn lane on Marion Road for vehicles turning right into Anzac Highway to head east shall be extended to maximize storage at this location.
 - (ii) Vehicle movements at the two-way access point to the car park on Anzac Highway shall:
 - be restricted to left turn in, left turn out and right turn in only. Right turn out movements shall not be permitted to occur in any form. To accommodate right-in movements, the U-turn facility shall be modified to prohibit U-turns from the northeast; or in the event that the design cannot

entirely prohibit the above movements, the U-turn on Anzac Highway shall be closed entirely and access restricted to left turn in and left turn out only.

- (iii) A left turn deceleration lane shall be provided at the Marion Road access to the car park. This shall be designed in accordance with the Austroads Guide to Road Design Part 4A and DPTI standards.
 - (iv) A separate right turn phase shall be provided at the Marion Road / Anzac Highway intersection for the eastern approach. Additionally, the phase times for the right turn movement from Anzac Highway into Cross Road shall be increased. These modifications shall be to the satisfaction of DPTI at the cost of the developer. This shall be undertaken prior to occupation of the development.
 - (v) The right turn lane on Anzac Highway western approach shall be extended by a minimum of 20m.
 - (vi) Sufficient land shall be set aside along the Marion Road and Anzac Highway property frontages to accommodate the required road works and to provide DDA compliant footpaths (any new or relocated footpath must be no narrower than the existing footpaths). All land required from the site to facilitate this requirement shall be vested to road at no cost to Council or DPTI.
 - (vii) All road works and improvements required to accommodate the proposed development shall be designed and constructed to the satisfaction of DPTI, with all costs (design, construction and project management) being borne by the developer. With regards to the design, the developer is required to seek approval for the concept plan from DPTI's Metropolitan Region, Senior Access Management Engineer, Ms Catherine Magraith on telephone (08) 8226 8325, before undertaking any detailed design work. All road works and improvements shall be completed prior to occupation of the development.
 - (viii) The five car parking spaces on the southern side and the eight spaces on the northern side of the Marion Road access aisle shall be removed from the proposal to minimize conflict adjacent the Marion Road access point.
 - (ix) The three car parking spaces immediately south of the two-way access point on Anzac Highway shall be removed from the proposal to minimize conflict adjacent the Anzac Highway access point.
- (f) A Traffic and Parking Management Plan, prepared to the reasonable satisfaction of Department of Planning Transport and Infrastructure and City of West Torrens Council, including legally binding agreements between the proponent and the responsible road authority for any necessary works and arrangements;
 - (g) A detailed Landscaping Plan for the site;
 - (h) A detailed Stormwater Management Plan prepared to the reasonable satisfaction of the Environment Protection Authority and City of West Torrens Council; and
 - (i) A Construction Environmental Management and Monitoring Plan for the pre-construction and construction phases, prepared to the reasonable satisfaction of the

PART B: CONDITIONS OF PROVISIONAL DEVELOPMENT AUTHORISATION

1. The development authorisation granted hereunder is provisional only, does not operate as a final development authorisation, and does not therefore authorise implementation of the proposed Major Development. Only an authorisation granted under section 48(2) (b) (i) can operate to authorise implementation of the proposed Major Development, which authorisation would only be granted after the reserved matters have been assessed and approved for each specific stage.
 - 1a. Except where minor amendments may be required by other legislation, or by conditions imposed herein, the proposed Major Development shall be undertaken in strict accordance with the following documents and drawings:
 - Development Application, prepared by QED Pty Ltd, dated 2 July 2007 (except to the extent that it may be varied by a subsequent document in this paragraph);
 - Development Application variation (to include one additional property) prepared by QED on behalf of the Palmer Group, dated 25 November 2008 (except to the extent where varied by a subsequent document in this paragraph);
 - Development Report - Mixed Use Development Anzac Highway & Marion Road Plympton, prepared by QED Pty Ltd on behalf of the Palmer Group, dated May 2009 (except to the extent that it may be varied by a subsequent document in this paragraph);
 - Amendment to the Development Report - Plympton Mixed Use Development, prepared by Connor Holmes Property Services on behalf of the Palmer Group dated May 2013 (except to the extent where varied by a subsequent document in this paragraph);
 - Response Report - Plympton Mixed Use Development, prepared by Connor Holmes Property Services on behalf of the Palmer Group dated July 2013; and
 - Assessment Report, prepared by the Minister for Planning, dated October 2013.

Building Work

2. Before any building work is undertaken on the site, the building work must be certified by a private certifier, or by some person determined by the Minister for Planning, as complying with the provisions of the Building Rules.

Staging and Completion

3. The proponent must address the reserved matters and submit relevant documentation for approval within 12 months hereof failing which I may cancel this provisional authorisation and exercise my power to refuse approval to the development under Section 48(2) (a).
4. Any final development authorisation granted under Section 48(2) (b) (i) shall be subject to a condition that the proponent must complete substantial work on-site within two years of the date of this provisional development authorisation, failing which I may cancel the final authorisation.
5. In addition, any final development authorisation granted under Section 48(2) (b) shall be subject to a condition that the proponent must comply with the following staging and timing requirements

failing which I may cancel the authorisation:

- Stage 1 - two (2) years from the date of final development authorisation to complete basement car park, Ground floor supermarket, Ground floor retail, Commercial, West Tower –(24 (2 bed) apartments, East Tower - (16 (2 bed) apartments).
- Stage 2 – four (4) years from the date of final development authorisation to complete Serviced Apartments
- Stage 3 – seven (7) years from the date of final development authorisation to complete North Tower

Built Form

6. The development as described at a maximum overall height of 48.3m AHD shall not penetrate the Adelaide Airport Obstacle Limitation surface (OLS) airspace protected for aircraft operations. Any further proposed addition to the structure above the maximum height, including aerials, masts and vent/exhaust stacks, would be subject to a separate assessment.
7. The development and the site shall be maintained in a serviceable condition and operated in an orderly and tidy manner at all times.
8. The eastern side of the West Tower shall provide adequate screening to a height of 1.7 metres from floor level to prevent overlooking to the adjacent existing residences.
9. Provision shall be made for secure storage of trolleys within the complex at night to the reasonable satisfaction of the City of West Torrens Council.

Lighting

10. All external lighting of the site, including car parking areas and buildings, shall be designed and constructed to conform with appropriate Australian Standards and shall be located, directed and shielded and of such limited intensity that no demonstrable nuisance or loss of amenity is caused to any person beyond the site.
11. Any lighting proposed shall conform to airport lighting restrictions and shall be shielded from aircraft flight paths to the satisfaction of Adelaide Airport Limited.

Signage

12. Appropriate ('way-finding') signage for directing pedestrians to public transport shall be installed to the reasonable satisfaction of the Minister for Planning.
13. The colours and illumination of signage associated with the site shall not create a glare or distraction to passing drivers and shall not interfere with the operation of adjacent traffic signals.
14. No element of LED or LCD display shall be included in the design of any signs visible from the adjacent road network.
15. Any signs associated with the development shall not interfere with existing traffic control devices or result in distraction or confusion of motorists. Any signs must be simple, effective and easily assimilated. Under no circumstance shall signs be allowed to flash, scroll or move as this would result in undesirable distraction to motorists.
16. Trailer mounted variable signs shall not be used on or adjacent the subject site for advertising purposes.

Waste Management

17. Waste disposal vehicles and general delivery vehicles shall only service the development between the hours of 7.00am and 7.00pm Monday to Saturday inclusive, and shall only load or unload within the confines of the subject land.
18. The waste and general storage and service/operational areas of the shopping centre and car parking area shall be kept in a neat, tidy, safe and healthy condition at all times.
19. All trade waste and other rubbish shall be stored in covered containers prior to removal and shall be kept screened from public view.
20. The service area access door/screening gate on Elizabeth Avenue shall remain closed at all times other than when loading or unloading is taking place.

Parking and Access

21. That all car parks, driveways and vehicle manoeuvring areas shall conform to Australian Standards and be constructed, drained and paved with bitumen, concrete or paving bricks in accordance with sound engineering practice and appropriately line marked to the reasonable satisfaction of the Development Assessment Commission prior to the occupation or use of the development.
22. All car parking areas, driveways and vehicle manoeuvring areas shall be properly maintained at all times.
23. All loading and unloading, parking and manoeuvring areas shall be designed and constructed to ensure that all vehicles can safely enter and exit the subject land in a forward direction.
24. The loading docks and associated access points shall be designed to facilitate 19.0m semi trailers.
25. The indented bus stop and taxi rank adjacent the Anzac Highway frontage of the site shall be relocated and or modified to the satisfaction of DPTI.
26. All redundant crossovers shall be removed and be replaced with kerb and gutter to Council standards, with all costs being borne by the applicant.
27. A kerb extension shall be provided to prohibit trucks turning right into Elizabeth Avenue from the service delivery exit to the reasonable satisfaction of the City of West Torrens Council.

Stormwater

28. No stormwater shall be permitted to discharge on surface to Anzac Highway or Marion Road. Any modifications to stormwater infrastructure as a direct result of the development shall be at the expense of the developer.
29. That all stormwater design and construction shall be in accordance with Australian Standards and recognised engineering best practices to ensure that stormwater does not adversely affect any adjoining property or public road.

Construction Activities

30. Normal operating hours for construction activities (including truck movements) to and from the site shall be from 7:00am to 7:00pm, Monday to Saturday inclusive.
31. Any machinery, plant operating equipment, lighting, building façade designs, or sound devices associated with the proposed development shall not impair or impinge upon the enjoyment or safety of residents of the apartment complex, adjoining properties (or occupiers thereof), or the local traffic and pedestrian environment, and shall comply with the Environment Protection (Noise) Policy 2007, Environment Protection (Industrial Noise) Policy 1994 and the Environment Protection (Machine Noise) Policy 1994.

PART C: NOTES TO PROPONENT

1. In respect of the reserved matters, the following is advised to the proponent:-

(a) *Building Rules*

The proponent must obtain a Building Rules assessment and certification from either the City of West Torrens Council or a private certifier (at the proponent's option) and forward to the Minister all relevant certification documents as outlined in Regulation 64 of the Development Regulations 2008.

Pursuant to Development Regulation 64, the proponent is especially advised that the or City of West Torrens Council private certifier conducting a Building Rules assessment must-

- provide to the Minister for Urban Development and Planning a certification in the form set out in Schedule 12A of the Development Regulations 2008 in relation to the building works in question; and
- to the extent that may be relevant and appropriate-
 - (i) issue a Schedule of Essential Safety Provisions under Division 4 of Part 12; and
 - (ii) assign a classification of the building under these regulations; and
 - (iii) ensure that the appropriate levy has been paid under the Construction Industry Training Fund 1993.

Regulation 64 of the Development Regulations 2008 provides further information about the type and quantity of all Building Rules certification documentation for Major Developments required for referral to the Minister for Planning. The City of West Torrens Council or private certifier undertaking Building Rules assessments must ensure that the assessment and certification are consistent with the provisional development authorisation (including its Conditions and Notes).

(c) *Final designs for each component of the development*

In regard to reserved matter (b), final design should address the following:

- Roof plans for all areas of the development;
- Roof areas for the shopping centre buildings shall be constructed out of a non-reflective material;
- Details showing the air intake vents for the basement car park and venting details for any restaurant/cafes;

- Details of lighting for the basement and ground level car park;
- Details of the colours proposed for the development;
- Redesign of the external car park to incorporate additional safe and direct paths for cyclists and pedestrians (including crossing points designed to highlight the presence of cyclists and pedestrians);
- Plans showing the location of secure bicycle parking for residents of the East and North Tower;
 - Acoustic treatment details that meet noise criteria as set out in:
 - AS 1276-1979: Methods for determination of sound transmission class and noise isolation class of building partitions;
 - AS ISO 140.8-2006: Acoustics - Measurement of sound insulation in buildings and of building elements, Laboratory measurements of the reduction of transmitted impact noise by floor coverings on a heavyweight standard floor; and
 - AS/NZS 1269.2:1998: Occupational noise management - Noise control management.
- All building work shall comply with the prescriptive requirements of the Building Code of Australia in particular AS2419.1, AS2441, AS 2118.1, AS2444, BCA Spec. E1.8, BCA Tables E2.2a and E2.2b, BCA Part E3, and AS2293.1;
- Exhaust hoods for car park ventilators shall be designed to direct exhaust fumes away from adjacent development. Car park ventilation should be directed away from open spaces and higher amenity areas, towards major roadways;
- Kitchen exhausts from the restaurants/cafes should be flued to direct odour away from the serviced apartments;
- All mechanical plants/air conditioning shall be housed/enclosed within the roof area as part of the design and any noise would be mitigated through the use of noise attenuating design measures;
- Air conditioning intakes on buildings should be located as far as is practicable from transport corridors;
- Air conditioning systems should include filtration to remove fine particles where ambient air quality is very poor (this is reliant on sealed positive pressure apartments in which access to unfiltered ambient air is not recommended);
- The requirements of the *Ministers Specification SA 78B Construction requirements for the control of external sound* (February 2013);
- All building work shall comply with the prescriptive requirements of the Building Code of Australia (BCA) and in particular: Fire hydrant coverage to be provided in accordance with AS2419.1; fire hoses to be provided in accordance with AS2441; automatic sprinkler protection to be provided in accordance with AS2118.1; portable fire extinguishers to be provided in accordance with AS2444; a fire control centre to be incorporated in accordance with BCA Spec E1.8; Smoke hazard management provisions in accordance with BCA Tables E2.2a and E2.2b; Lift installations in accordance with BCA Part E3 and exit and emergency lighting to be installed in accordance with AS2293.1;
- The Metropolitan Fire Service would need to be consulted and involved with the design, approval and commissioning phases as required under the Development Regulations 2008. For further advice on fire safety the contact person is Fire Safety Engineer, Mr David Kubler on telephone 8204 3611. Should variations to the prescriptive requirements of the BCA be proposed, suitably justified 'alternative solutions' should be presented to the Metropolitan Fire Service (MFS) South Australia for comment and Document in accordance with Regulation 28 of the Development Regulations, 2008. The MFS recommends that the developer liaise with the department in the early design phase to ensure that a cost effective installation that would also meet the operational needs of the fire service can be achieved; and

- Details on odour management between uses.

(c) *Building Sustainability Plan*

In relation to reserved matter (c), the Building Sustainability Plan should address energy consumption and green house emissions below the current levels to satisfy environmental performance. The approach to the design of this proposal should exceed the requirements of Part J of the Building Code on Energy Efficiency and as discussed in the Development Report (DR) and the Amendment to the DR to provide energy efficiency to achieve a 5 star rating for the serviced apartment component and aim to provide a 5 Star Green Star GBCA Rating for the commercial component.

(e) *Waste Management Plan*

The Waste Management Plan shall address the following:

- construction associated with the shopping centre tenancies and serviced apartments
- the operational and ongoing waste for the shopping centre, including recycling and waste minimisation;
- servicing arrangements and waste removal provisions for the whole of the development (including commercial and retail);
- Ongoing waste management for the serviced apartment component;
- Reference to Zero Waste SA, (in partnership with the Property Council and Renewal SA), a better practice guidance for medium density, high density and mixed use developments, which includes the following:
 - internal design (waste management systems, for example chutes or compactors)
 - collection areas (ease of access to bins by residents, enclosure sizes, visual amenity)
 - bin presentation areas (visual amenity, access and egress for collection vehicles)
 - waste collection (noise and sensitive adjacent users)

(f) *Traffic and Parking Management Plan*

In regard to the Traffic Parking and Management Plan should address the following:

(a) Parking Management:

- The layout of the car parking areas (including basement car parking), and service bays shall meet the Australian/New Zealand Standard 2890.1:2004, Parking Facilities – Off-Street Car Parking and line markings and Australian Standard 2890.2-2002 Parking Facilities – Off-Street Commercial Vehicle Facilities (including service areas);
- The final plans and details should ensure that sufficient secure bicycle parking and end of trip facilities are provided and that visitor bicycle parking rails are well positioned for passive surveillance. The location of secure bicycle parking for residents and employees should be indicated on the plans. The bicycle parking facilities shall be designed in accordance with Australian Standard 2890.3-1993 and the AUSTROADS, Guide to Traffic Engineering Practice Part 14 – Bicycles;
- The on-site parking shall be designed in accordance with the Australian/New Zealand Standard 2890.1:2004 and 2890.6:2009. All facilities for commercial vehicles shall conform to Australian Standard 2890.2:2002;
- The car park shall be appropriately line marked and signed to ensure the desired flow of traffic through the site;

- All bicycle parking facilities, shall be designed in accordance with Australian Standard 2890.3-1993 and the AUSTROADS, Guide to Traffic Engineering Practice Part 14 – Bicycles;
- Access and egress from the car parking areas shall be designed in accordance with the Australian/New Zealand Standard 2890.1:2004, Parking Facilities, Part 1 - Off-street car parking;
- Turning areas and loading bays required for semi-articulated delivery vehicles, shall meet Australian Standards for Off-street Parking Facilities (AS 2890.1 for cars, AS 2890.2 for commercial vehicles); and
- Lighting shall be provided within the basement car parking area and the at grade car parking area in accordance with the public lighting code in AS 1680.2.1-1993, AS/NZS 1158:2007 and AS/NZS 1680.

(b) Traffic Management:

- The entry only into the car park from Anzac Highway shall be designed to maximize pedestrian safety;
- Any traffic control devices shall be designed and constructed in accordance with the main standard of the Manual of Uniform Traffic Control Devices - AS 1742.
- Driveway grades shall be set in accordance with AS2890.
- The main standard for traffic control devices is the Manual of Uniform Traffic Control Devices - AS 1742. There are many standards under AS 1742 covering the various traffic control devices that may need to be referred to. They are as follows:
 - AS 1742 Manual of uniform traffic control devices
 - General introduction and index of signs – Australian Road Rules supplement
 - Supp.1 (Int)
 - 1742.2 Part 2: Traffic control devices for general use
 - 1742.3 Part 3: Traffic control devices for works on roads
 - 1742.4 Part 4: Speed controls
 - 1742.9 Part 9: Bicycle facilities
 - 1742.10 Part 10: Pedestrian control and protection
 - 1742.11 Part 11: Parking controls
 - 1742.13 Part 13: Local area traffic management
- Service vehicles are required to turn left out to Marion Road. The alignment of the exit movement should be tightened up and angled appropriately to force large vehicles to turn left out as intended. 'NO TRUCK' signs should also be considered to prevent service vehicles from turning right out to use the nearby residential streets. Details are required on how this will be achieved.

(g) ***Landscaping Plan***

In regard to reserve matter (g) the Landscaping Plan should provide the following:

- Details shall be provided showing street furniture, shading devices and lighting;
- Planting details;
- Elizabeth Avenue streetscape details; landscaping and streetscape to Elizabeth Avenue will be addressed in consultation with the City of West Torrens Council;
- Location of tanks for water reuse for irrigation purposes;
- A detailed species list including local indigenous plants;
- The planting of semi- mature trees (not less than 2-3 metres in height) within the car parking area;
- All landscaping approved as part of the application shall be established prior to the occupation of the premises;
- A watering system shall be installed and operated so that all plants receive sufficient

- water to ensure their survival and growth;
- Landscaping, shall be designed to incorporate water conservation principles and devices (Water Sensitive Urban Design);
- The proposed landscaping contribution to the Urban Forest program;
- The inclusion of details for any proposed Green infrastructure (green walls/roofs);
- Open spaces containing trees and other vegetation should be established between housing and transport corridors to increase natural air filtering processes; and
- Trees should be planted along major roadways to increase natural air filtering processes.

(h) *Stormwater Management Plan*

In regard to reserve matter (h) the Stormwater Management Plan should address the following:

- All stormwater design and construction should be in accordance with Australian/New Zealand Standards, AS/NZS 3500-2003 and recognised engineering best practices to ensure that stormwater does not adversely affect any adjoining property.
- The EPA requires the following be included:
 - How the first flush will be managed;
 - How stormwater will be managed during the construction phase;
 - That any stormwater discharging from the site will occur in accordance with the Environment Protection (Water Quality) Policy 2003;
 - How will sediment runoff from the site be minimised as well as sediment stockpiles; and
 - Maintenance of stormwater management and infrastructure.
- The City of West Torrens Council request that the applicant enters into discussions with the City Assets Department to establish an effective and well integrated stormwater management system;
- The proponent is advised of the requirement to comply with the Environment Protection Authority's (EPA) "Stormwater Pollution Prevention Code of Practice for the Building and Construction Industry" during demolition and construction of the development;
- Development/s shall have no deleterious effects on the quality or quantity of surface water or the natural environments that rely on this water;
- Development/s shall have no deleterious effects on the quality or quantity of groundwater, or the natural environments that rely on this water. In particular, the following conditions shall apply:
 - Effluent disposal systems (including leach drains) to be designed and located to prevent contamination of groundwater;
 - Ground water levels for the at the site (basement car park) need to be included; and
 - If any dewatering will be required (an activity that may require an EPA licence).

All extensions to water/wastewater networks will be assessed on their individual commercial merits. Where more than one development is involved, one option will be for SA Water to establish an augmentation charge for that area, to equitably share the costs amongst those requiring and/or benefiting from the provision of the additional infrastructure. Any proposed augmentation charge will be assessed on its individual commercial merits

- If the existing water/wastewater infrastructure requires an extension or new approach mains to serve any proposed development, the developer/s will be required to meet the costs associated with these works.

- When a proposed development adversely impacts upon the capacity of existing water/wastewater infrastructure, the developer will be required to meet the cost of upgrading or augmenting the infrastructure to service the proposed water demands and/or wastewater discharges.
- The developer is also required to meet the costs of providing all water supply mains within the development site itself, including all water and wastewater pumping stations, pumping mains and water tanks.
- All new water supply mains constructed to serve commercial / industrial areas shall be a minimum size of 150 mm diameter. This is to provide an adequate water supply for industry as well as for fire protection purposes.
- Similarly all new wastewater collection pipes required to serve commercial / industrial areas shall be a minimum size of 225 mm diameter, and all property connections shall be a minimum size of 150 mm diameter. Where areas are being served by existing 150 mm diameter sewers, restrictions may be imposed on the types of development permitted in view of the smaller size mains.
- Construction of water supply, wastewater and recycled water infrastructure will need to comply with SA Water Infrastructure Standards.
- Any proposed industrial or commercial developments will be subject to an SA Water Trade Waste agreement, to permit the discharge of trade waste to the sewer network. Industrial and large dischargers may be liable for quality and quantity loading charges.

(i) ***Construction Environmental Management and Monitoring Plan for the preconstruction, construction and operational phases***

The CEMMP should be prepared taking into consideration, and with explicit reference to, relevant Environment Protection Authority policies and guideline documents, including the Environment Protection (Noise) Policy 2007 and air quality National Environment Protection Measures (NEPMs). A Construction Environmental Management and Monitoring Plan (CEMMP) covering both pre-construction and construction phases shall be prepared in consultation with the Environment Protection Authority, before its submission to the Minister for approval. The CEMMP shall include the following:

- Reference to, and methods of adherence to, all relevant Environment Protection Authority (EPA) policies and codes of practice for construction sites, including the inclusion of a copy of Schedule 1 of the Environment Protection Act 1993 as an Appendix to the Construction Environmental Management and Monitoring Plan to ensure contractors are aware of EPA requirements;
- Soil Erosion and Drainage Management Plan (including dust management);
- timing, staging and methodology of the construction process and working hours (refer also to condition outlining working hours);
- A risk assessment relating to the potential impacts of construction activities that includes the staging of the development;
- Traffic management strategies during construction of both the basement car park and the shopping centre and apartment complex, including transport beyond the development site;
- Site contamination audit; provide a site history report that identifies any activities or potential for site contamination to have occurred from 2009 to present. The EPA advises that the site history report should:
 - be prepared by a site contamination consultant in accordance with Schedules A and B of the National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPM); and
 - document the preliminary investigations at the site carried out in accordance with the NEPM; and

- determine whether a potentially contaminating land use as described in Appendix 1 of Planning Advisory Notice 20 (PAN 20) has occurred with the potential to cause site contamination affecting the site; and
 - provide statements in relation to the existence of site contamination at the site. Statements by site contamination consultants in relation to site contamination must be clearly qualified as to the existence of site contamination at the site by specifying the land uses that were taken into account in forming that opinion as required by Section 103ZA of the Environment Protection Act 1993.
- Management of infrastructure services during construction and re-establishment of local amenity and landscaping;
 - Control and management of construction noise, vibration, dust and mud;
 - Engineering and structural issues associated with construction of the basement car park and overhead landscaping ;
 - Stormwater and groundwater management during construction;
 - Identification and management of contaminated soils and groundwater, should these be encountered;
 - Site security, fencing and safety and management of impacts on local amenity for residents, traffic and pedestrians;
 - Disposal of construction waste, any hazardous waste and refuse in an appropriate manner according to the nature of the waste;
 - Protection and cleaning of roads and pathways;
 - Overall site cleanup; and
 - To address management and site issues during construction and site contamination
 - Will need to demonstrate compliance with the National Environment Protection (Ambient Air Quality) Measure (1998) and with the National Environment Protection (Air toxics) measure (2011).
2. Crane operations associated with construction should be the subject of a separate application to Adelaide Airport Limited (48 days prior notice required for any crane operations during construction). Crane assessment may also have to be conducted by the Civil Aviation Safety Authority (CASA).
 3. The developer should note that the height limit applies to antennae, masts and aerials that may be placed on top of the building, so the proponent should ensure that the building (plus envisaged structures on top of the building) do not infringe the Obstacle Limitation Surfaces (OLS). The Adelaide Airport Safety Manager has advised the building height would be just under the OLS, but masts and structures on top of the building would not be allowed. Any external lighting associated with the development or the use of cranes for construction on the site would need to be referred to the Federal Airports Corporation.
 4. The Metropolitan Adelaide Road Widening Plan shows that a strip of land up to 4.5 metres in width may be required from the Anzac Highway and Marion Road frontages of the site, together with additional land from the Anzac Highway/Marion Road corner for the possible future upgrading of the Anzac Highway/Marion Road intersection. An additional 4.5 metres x 4.5 metres cut-off is required from the Marion Road/Elizabeth Avenue corner of the site. The consent of the Commissioner of Highways is required under the Metropolitan Adelaide Road Widening Plan Act for all new building works located on or within 6.0 metres of the above requirements. The required consent form should be completed and returned to the Department of Planning Transport and Infrastructure with three copies of the final stamped approved plans.
 5. Some of the subject land may need to be vested as part of the road reserve at no cost to Council and the Department of Planning Transport and Infrastructure, to ensure that adequate footpath is maintained along Marion Road. Kerb widening to increase the radius of the curve to allow semi

trailers to negotiate the left turn out of Elizabeth Avenue may require some land to be vested as road reserve, at no cost to Council or the Department of Planning Transport and Infrastructure, to ensure that an adequate public footpath is maintained at this location.

6. The Environment Protection Authority advises, given the significance of the forecast traffic changes, that air quality modelling should be undertaken, as clean air would be imperative to informing the design outcome.
7. The proponent is advised of the General Environmental Duty under Section 25 of the *Environment Protection Act 1993*, which provides that a person must not undertake any activity, which pollutes, or may pollute; without taking all reasonable and practical measures to prevent or minimise harm to the environment.
8. The proponent is advised that the *Development Act 1993* outlines the roles and responsibilities of the applicant and the City of West Torrens Council for matters relating to building works during and after construction of the shopping centre and apartment complex development and associated works.
9. The provisions of the *Food Act 2001*, and associated food regulations apply.
10. In addition to the Building Code of Australia, the proponent must comply with the *Commonwealth Disability Discrimination Act, 1992*, in planning access for the disabled.
11. The Minister has a specific power to require testing, monitoring and auditing under Section 48C of the *Development Act 1993*.
12. If the development is not substantially commenced within two years of the date of the decision on the last of the reserved matters, the Governor may cancel this development authorisation.
13. The development shall include directional and way finding signage that indicates the short walking distance/time to the tram stop and bus stops.
14. Should additional signage be required, above and beyond the proposed pylon sign on Anzac Highway, these must be assessed to ensure that they would not impact on road safety, particularly given the complexity and nature of movements at this location.

PLYMPTON MIXED USE DEVELOPMENT

RESPONSE REPORT

PREPARED ON BEHALF OF THE PALMER GROUP
JULY 2013



DOCUMENT CONTROL

REVISION	DESCRIPTION	AUTHOR	DATE
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EXECUTIVE SUMMARY

A total of 16 submissions were received in respect to the Amended Development Proposal. These raised issues covering:

- Traffic, access, and parking;
- Safety and in particular for children;
- Design, scale, open space and landscaping;
- Affordable housing;
- Definition of development;
- Demand and employment assumptions;
- Environmental management including water, waste water management, WSUD, Waste management; noise, air quality;
- Construction management.

In many instances the issues raised have already been covered off as part of the planning for the proposal.

As a result of the submissions however the following is proposed and/or confirmed:

- Construction will be undertaken in accord with all relevant policies, legislation, guidelines and approvals.
- On-going general site management will include addressing graffiti if and as required.
- Water Sensitive Urban Design features will be expanded as part of the detailed design phase for Building Rules consent.
- Stormwater management will be refined as part of the detailed design processes for Building Rules consent and will include consultation with Council's Assets department.
- Landscaping/street scaping treatments will be developed for Elizabeth Street as part of the detailed design for Building Rules consent. Council will be consulted in respect to these treatments.
- Further consideration will be given to indigenous plant species for green walls and on-site landscaping as part of the detailed design for Building Rules consent. Use of indigenous plant species can be included as a condition of approval.
- The development must (and will) comply with all relevant environmental legislation. Detail of the treatments proposed however may not be known until the detailed design work is completed for Building Rules consent. Although superfluous this can be a condition of consent if it provides additional comfort.
- The previous CEMP is still applicable, but a project specific CEMP for the current proposal is to be developed
- Further investigation into ground water, site contamination, noise and air emissions will be undertaken as part of the detailed design and building rules consent stage.
- Relevant acoustic design treatments will be considered and included as part of the detailed design for building rules consent.
- Waste will be managed by a third party contractor via communal large bins. Locations of bin storage have been shown on the amended site plan attached.
- The revised site plan shows the access point as being the current access point from the site and therefore the traffic is unchanged. The bus stop and taxi rank



are indicated to the immediate south of both entrances respectively as requested by DPTI.

- Agree to close the median at the junction of Mabel Street and Marion Road upon completion of the development. This can be a condition of approval. The proponent is however keen to agree costs prior to commencing the closure works.
- Agree for the phase time changes viz separate right turn phase at Anzac Hwy and Marion Road intersection eastern approach and increased phase time for right hand turns from Anzac Hwy to Cross Road to be implemented upon completion of the project should the need be justified. Require confirmation of costs prior to implementation.
- Agree to ensure that the deceleration lane at the Marion Road access to the car park will be designed in accord with the Austroads Guide to Road Design Part 4A and DPTI standards. This can be required by Condition.
- The Right Hand turn lane on the Anzac Hwy western approach will be extended by 20m, subject to demand following completion of the project. The proponent is however keen to agree costs prior to commencing the closure works.
- The angle of the entry to Anzac Hwy will be modified to reduce vehicle entry speeds. This can be required by Condition.
- Agree to provide sufficient land for DDA compliant footpaths along Anzac Hwy and Marion Road.
- Any redundant crossovers will be reinstated.
- On-site parking will be designed to A/NZ standard 2890.1:2004, line marked and signed. This can be required by Condition.
- Bike parking facilities will be provided in accord with AS 2890.3-1993 and the Austroads, guide to traffic engineering practice Part 14 bicycles. This can be required by Condition.
- Way finding signs will be included as part of the detailed design.

The refinement of the design, with the additional amendments outlined above has enabled the proposal to now address the key issues raised. Specifically the project provides a corridor development that will comprise a mix of uses leading to a vibrant community and centre.

The development will support the use and patronage of surrounding public transport and traffic impacts can be managed.

The design provides for a landmark development that appropriately transitions from typical suburban development to more responsive corridor development – sensitively increasing the density on the site.

The building form maximises the visual interest and minimises intrusions from the perspective of visual amenity, scale, bulk, overlooking and overshadowing.

The development will employ green building design techniques and WSUD, and will provide a benchmark for future corridor developments.

The development will lead to the attainment of Government objectives of the 30 Year Plan for Greater Adelaide through increasing population, providing affordable housing, increasing services and walkability, support public transport use and provide for increased sustainability.



1. INTRODUCTION

1.1 Overview of Proposal

The Plympton Mixed Use Development is a proposal to construct a mixed use development. The development will comprise retail, commercial and residential development. The retail will comprise a shopping centre containing a full line supermarket, and specialty retail outlets together with appropriate on-site loading and servicing facilities. Office/commercial space will be located above a portion of the retail. Two levels of serviced apartments will be located above the offices/commercial space. At the far north-west corner of the retail building and above the first level car parking spaces will be a further six levels of residential apartments. Two stand-alone four storey residential buildings with dedicated affordable housing product and above ground level car parking will be located at the south-west and south-east corners of the site respectively. There is proposed to be a total of 108 apartments on site. Car parking will be provided at basement level, at grade and at first floor level.

1.2 Project History

On 24 May 2007 the Minister for Urban Development and Planning made a declaration in the South Australian Government Gazette for the proposed development to be assessed as a Major Development under the provisions of Section 46 of the Development Act 1993.

As part of this process Guidelines were published by the Development Assessment Commission for the preparation of a Development Report.

The initial Development Report was prepared by QED dated May 2009.

This initial proposal underwent public consultation from 6 July 2009 to 14 August 2009. A total of 11 submissions were received during the consultation period.

The required response report was prepared and submitted to the then Planning SA in September 2009 for consideration as part of the final step of the application process.

An unsigned submission from the former Department of Transport, Energy and Infrastructure (Transport Services) dated 24 September 2009 has been subsequently provided to the proponent.

It is understood that this late submission (in combination with market uncertainty) had the effect of delaying the project, such that the matter was never put forward for a decision.

The proponent remains committed to the project and sought approval from the Minister to continue the process.

In April 2012, following further discussions with the Department of Planning Transport and Infrastructure (DPTI) in relation to the submission from Transport Services, DPTI advised the proponent to undertake the modelling as required by Transport Services and to resubmit a revised response document to enable the finalisation of the assessment process.

In January 2013 the proponent submitted the revised response document and all of the additional modelling to DPTI for consideration.

The proponent was subsequently advised on 24 April 2013 that the proposal would need to be readvertised.

Accordingly in May 2013 the proponent lodged an Amendment to the Development Report that was subsequently released by DPTI for public consultation from 29 May 2013 until 19 June 2013.

1.3 Purpose of this Report

The purpose of this report is to respond to the submissions received in respect to the Amended Development Report.

2. BACKGROUND

2.1 Key Issues Raised as Part of 2009 Consultation

A total of 12 submissions¹ were received in response to the consultation process for proposed Mixed Use Development Proposal in 2009. These comprise four from members of the community, one submission from Adelaide Airport Limited, five submissions from Government Agencies, including SA Health, the Metropolitan Fire Service, SA Water, the Environment Protection Agency, and Transport Services and, one submission each from the Cities of West Torrens and Marion.

Three of the four submissions from the community specifically noted that the development generally would be a positive addition to the area, subject to consideration of specific matters.

The key issues arising out of the public consultation can be summarised as follows:

- Traffic impacts and in particular access and egress, the impacts on Anzac Highway, Marion Road and Elizabeth Avenue;
- Access for pedestrians and cyclists;
- Water and waste water management;
- General planning considerations, ie current zoning, urban development, aesthetics/amenity and whether or not the proposal can be considered to be a Transit Oriented Development (TOD);
- Noise and air quality;
- Building code issues;
- Construction management; and
- Staging

2.2 Revisions to Proposal

Following consideration of the submissions and changes in the economic climate the proposal was revised to address these matters as far as is practicable. In essence, the proposal has been reconfigured to improve the functionality and operation of the site, address issues raised in respect to traffic, accessibility and parking, provide alternative forms of accommodation including affordable rental accommodation, revise the bulk and scale and increase the articulation and, improve the staging logic of the project to ensure that Council and Government objectives for residential and mixed use development are met as well as improving marketability.

Specifically the revisions and the benefits can be summarised as follows:

- A redesigned built form that results in reduced heights, improved horizontal and vertical articulation by separating the built form into three distinct buildings of varying height and bulk, and providing an enhanced residential interface to Elizabeth Avenue.
- Slightly reduced floor space for the retail and commercial components whilst retaining ability to provide a full line supermarket, and thereby reducing overall car parking demand and traffic generation.

¹ This includes the late submission from DTEI Transport Services.



- a) Car parking can therefore be provided for the retail component at a rate higher than the generally accepted standard taking into consideration sharing arrangements with the hotel.
 - b) The reconfiguration of the site parking arrangements also enables the car parking associated with the existing Highway Hotel to continue to operate during construction.
- Reconfigured access and parking arrangements on the site to improve legibility for motorists and pedestrians and improve the functionality of the site.
 - a) Separated traffic access points and parking on site. Residential and office traffic and parking (first floor) access from Elizabeth Avenue, retail traffic and parking (basement and at grade) and commercial (loading traffic) separate access way to west of site.
 - b) Simplified the design and operation of the at grade car parking area.
 - c) Improved the stacking area between the Marion Road entry and the basement car park.
 - d) Removed the stacked parking loop adjacent the western retail facilities.
 - e) Negated the need to reconfigure the median arrangements on Anzac Highway.
 - f) Improved and simplified loading arrangements for the retail providing for a range of vehicles.
- Reconfigured the residential components to provide for 108 apartments including dedicated affordable and serviced apartments. Two freestanding groups will be 4 levels with one group (over retail and a car park) to 6 levels, ie a total of 8 levels. The serviced apartments are to be located over two levels above the retail and commercial components of the development.
 - a) This provides a clearer split between the tenure of the apartments for car parking purposes and is considered to be realistic from a market perspective including the provision of affordable housing.
 - b) The apartment buildings oriented towards Elizabeth Avenue have been reduced in height to four storeys to add to the residential interface on this street.
 - c) Provides uses to support the existing public transport networks.
 - d) Provides greater certainty for the early development of apartments, as they are not dependent upon the construction of new retail components.
- Provision of affordable housing
 - a) In line with Government Policy the residential component will include affordable housing. This may be in the form of affordable rental product.

3. 2013 CONSULTATION OVERVIEW

As a result of the most recent round of consultation a total of sixteen (16) submissions were received.

A total of ten (10) submissions were received from private individuals or community organisations, five (5) from government agencies and one (1) from the local Council.

One of the community submissions was expressly prepared in response to the original proposal as distinct from being specifically prepared in response to the Amendment to the Development Proposal.

A few of the submissions expressly support the proposal both with and without comment, and a couple seem to seek rejection of the proposal a few more express specific concerns about the proposal, one invites greater creativity and the balance raise issues for consideration/clarification.

The key matters raised through the submissions can be grouped into the following topics:

- Traffic, access, and parking;
- Safety and in particular for children;
- Design, scale, open space and landscaping;
- Affordable housing;
- Definition of development;
- Demand and employment assumptions;
- Environmental management including water, waste water management, WSUD, Waste management; noise, air quality; and
- Construction management.

A copy of each of the submissions received is included at Appendix 1.

The key issues arising from each individual submission are addressed in the next section.

4. RESPONSE TO SUBMISSIONS

Submission	Issues raised	Response/Comments	Action
Mr/s V Paschalis	Proposal is for an already busy corner	A comprehensive traffic study has been undertaken in respect to the proposal and this demonstrates that the intersection will be able to function with minor signal changes and a stacking lane extension.	No action required at this time. Any traffic management will be implemented as per the application and/or any conditions attached to an approval.
	Where will cars park?	The proposal provides for 448 car parking spaces, in a basement car park and roof deck car park. Traffic and Parking studies indicate that this is sufficient parking to accommodate the uses on the site.	No action required.
	Western suburbs are being targeted for development and there is no space.	The proponent owns this site and the proposal is in accord with the Government's 30 year Plan for Greater Adelaide.	No action required.
Ms L. Rutherford	Supports the proposal for environmental considerations, the bike parking and the retail and in particular the supermarket.	Noted.	No action required.
Confidential name withheld	Noise and dust from construction work, especially early hours of the morning and during the day.	The proposed building will be constructed in accord with environmental regulations. EPA guidelines and the EPP (Noise) policy will be observed. This precludes noisy activities at certain times of the day/night.	All regulations will be abided.
	Neighbours have not been considered.	The current design has been established having regard to comments made by the community in respect of the consultation on the original proposal. The design considers the neighbours in that it will provide an increased range of services and facilities within the area, and the design of the building is such that traffic noises and loading is away from residential properties as far as is practicable and overshadowing of properties is kept to minimum levels that meet all guidelines.	No action required.
	Numerous disabled pensioners in the area that depend on lack of disruption.	Noted. As outlined earlier construction will be undertaken in accord with current regulations and standards. In addition, the precinct will be targeted to medical/health facilities and this should be of benefit to those in the community who are less abled and/or ill.	No action required.

Submission	Issues raised	Response/Comments	Action
South Adelaide Christadelphian Ecclesia Inc.	Been in Elizabeth Avenue for 85 years and worshipping at the site for 36 years. Congregation of elderly and families with children.	Noted	No action required.
	Exiting (from the Church) on to Elizabeth Avenue is hazardous particularly when vision to the south is blocked by a bus. People travel through the side streets to access Cross Road.	The traffic study has shown that the development will not adversely impact traffic along Elizabeth Avenue.	No action required.
	Parking close to the church will be more difficult due to Elizabeth Avenue being used for loading vehicle egress, access to parking for the south east and western towers.	Sufficient on-site car parking will be proposed for the proposed development and therefore should not impact church and/or on-street parking. A traffic study has shown that the development will not adversely impact traffic along Elizabeth Avenue.	No action required.
	Residents accessing the supermarket will park in Elizabeth Avenue and Alice Street.	Sufficient on-site car parking will be proposed for the proposed development and therefore should not impact church parking.	No action required.
	Haven't heard from "them" since a quick visit in 2009 and have been left wondering about future and viability on our site.	Post 2009, the proposal was being assessed and amendments considered. This is the first opportunity to consult on the revised plans.	No action required.
	Would prefer there to be no access to the supermarket from Elizabeth Avenue.	There is no pedestrian access to the supermarket directly from Elizabeth Avenue.	No action required
	Requested to be contacted.	Connor Holmes contacted the South Adelaide Christadelphian Ecclesia Inc. and the key issue appeared to be the Church thought there was pedestrian access to the supermarket from Elizabeth Avenue and the concern that this would encourage people to park in Alice and Elizabeth Streets. Connor Holmes confirmed that there is no direct pedestrian access to the supermarket from Elizabeth Avenue which seems to have allayed that concern.	No action required
Mrs/Ms J Ough	Three weeks is insufficient time for consultation.	Noted. Not responsibility of proponent. Proposal has been previously released for consultation.	No action required.

Submission	Issues raised	Response/Comments	Action
Mrs/Ms J Ough (cont)	Support proposal to have service vehicles turning to the left only in Elizabeth Street, but question how this will be policed.	The access way will be designed such that a right turn will not be possible without mounting the kerb. This is a standard traffic management technique.	No action required.
	Concerned that there will be 108 residential units on the corner block of Elizabeth Avenue, with 250 people and their cars.	There will be only 16 residential apartments at the corner of Elizabeth Avenue and Marion Road. There will also be 24 residential apartments at the south western corner of the property with access to Elizabeth Avenue. Both will be four storeys in height above ground level car parking. The traffic and parking assessment by Aurecon found that Elizabeth Street will not be impacted by the proposal.	No action required.
	Concerned for safety of children walking down Elizabeth Avenue and Marion Road.	The proposal will not impact the safety of Children walking on the footpaths along these roads.	No action required.
	Safety of Children generally due to increased people, traffic and noise.	A traffic study has shown that the development will not adversely impact traffic along Elizabeth Avenue. The residential component of the proposal should increase casual surveillance of the area.	No action required.
	Narrow width of Elizabeth Avenue.	A traffic study has shown that the development will not adversely impact traffic along Elizabeth Avenue.	No action required.
	Traffic will be increased during the day with workers parking to catch the tram.	Sufficient on-site car parking will be provided for the proposed development and therefore should not impact on-street parking. The development of itself is not intended to be a park and ride facility, but to provide facilities the can be accessed by and, a residential population that has access to good public transport.	No action required.
	Residences and businesses south along Marion Road have access to a lane will this access be dangerous for children and others.	The proposal does not impact the lane.	No action required.

Submission	Issues raised	Response/Comments	Action
Mrs/Ms J Ough (cont)	Lack of recreational and neighbourhood services and the potential for gangs and graffiti.	<p>The proposal will include non-traditional community spaces such as cafes and plaza areas where people can congregate and recreate.</p> <p>Graffiti will be discouraged via finishes and materials but any graffiti will be removed from the site as part of the on-going management.</p> <p>It is unclear how or why this proposal would encourage gangs.</p>	No action required other than as part of the ongoing site management.
	The proposed policy for Housing Diversity is for four story housing on Elizabeth Avenue.	It is understood that this comment is referring to Council's DPA that was released for consultation earlier this year. This proposal is being assessed on its merits in accord with the Major Development process. It Nevertheless accords quite closely with the draft policy and intent of the Council's housing and diversity DPA.	No action required.
	The proposal could easily end in social discord.	The proposal includes a range of housing forms and types and is considered unlikely to encourage social discord.	No action required.
Mr A. Woolacott	Supports the proposal. Agrees with the benefits of the additional shopping facilities, cafes and meeting spaces.	Noted.	No action required.
	Will provide a needed focal point.	Noted.	No action required.
	New residents can make use of recent transport enhancements eg the tram and bikeway.	Noted.	No action required.
Mrs/Ms F. Biglands	<p>Traffic concerns.</p> <p>Have difficulties now getting out of driveways on Marion Road.</p>	A comprehensive traffic study has been undertaken in respect to the proposal and this demonstrates that the traffic along Marion Road and Anzac Highway can and will be appropriately managed.	<p>No action required at this time.</p> <p>Any traffic management will be implemented as per the application and/or any conditions attached to an approval.</p>
	Send the development elsewhere rather than having everything in the western suburbs.	The proponent owns this site and the proposal is in accord with the Government's 30 year Plan for Greater Adelaide.	No action required.

Submission	Issues raised	Response/Comments	Action
Mr/s J Van Den Broeke	Visual impact is "enormous" and out of character.	<p>The proposal represents a new form of development being a mixed use development including retail commercial and residential development forms. It is suggested that the proposal is not enormous and will establish its own character for the site, which is a landmark corner.</p> <p>The proposal seeks to implement the objectives of the Government's 30 Year Plan for Greater Adelaide. The design incorporates a range of heights and the massing has been broken to provide a transition from tradition suburban housing forms to more modern residential apartments in a mixed use setting.</p>	No action required.
	Developer is seeking to force zoning restrictions to be changed to suit themselves.	The proposal is not linked to any rezoning process it is a stand-alone Major Project development application.	No action required.
	Plans are misleading. Are buildings four storeys or four storeys on top of car parking and shops?	<p>It is suggested that the plans are not misleading.</p> <p>The heights of the buildings on the site vary.</p> <p>As is stated in the Amendment to the Development Report, the east and west towers are four levels above an at-grade car park, and the northern tower is 6 levels above a shop and level of car parking. The serviced apartments sit above the supermarket and offices.</p>	No action required.
	The streetscape to Elizabeth Avenue is too high and there is no setback.	The built form to Elizabeth Avenue has been carefully designed to be respectful and reflective of the residential interface to the south. The built form to this façade has been scaled down from the original proposal and broken up to include the two residential towers. It is considered that this façade of the development proposal is appropriate to the setting.	No action required.
	Development will increase population density and traffic.	<p>The development will increase population density and this is in accord with the Government's 30 Year Plan for Greater Adelaide.</p> <p>A comprehensive traffic study has been undertaken in respect to the proposal and this demonstrates that the traffic along Marion Road and Anzac Highway can and will be appropriately managed.</p> <p>The traffic study has also shown that the development will not adversely impact traffic along Elizabeth Avenue.</p>	No action required.

Submission	Issues raised	Response/Comments	Action
Mr D Bayliss	Concerns that the development will impact negatively on the family, the neighbourhood and their lifestyle.	<p>Noted.</p> <p>The proposal has been specifically designed to minimise any negative impacts on surrounding residents.</p> <p>In addition the proposal will provide for services such as specialty retail, cafes and other lifestyle services that will provide additional opportunities for all of the community.</p>	No action required.
	The area has ample supermarkets, and affordable units and offices, and the serviced apartments could be included in the hotel complex.	<p>The proposal is in accord with the Government's 30 Year Plan for Greater Adelaide, which is looking to service increased population in a balanced manner with infill development, and jobs along with Greenfield development.</p> <p>A retail analysis by A. Tutte has demonstrated that there is demand for retail in the area.</p> <p>The apartments are an appropriate use for this development.</p>	No action required.
	The scale of the development is deceptive, there is no setback to Elizabeth Avenue. The proposal will dwarf the existing area and is not complementary.	<p>The proposal represents a new form of development that is appropriate and will establish its own character for the site, which is a landmark corner.</p> <p>The proposal seeks to implement the objectives of the Government's 30 year Plan for Greater Adelaide. The design incorporates a range of heights and the massing has been broken to provide a transition from tradition suburban housing forms to more modern residential apartments in a mixed use setting.</p> <p>Specifically, the built form to Elizabeth Avenue has been carefully designed to be respectful of the more residential interface. The built form to this face has been scaled down from the original proposal and broken up to include the two residential towers. It is considered that this façade of the development proposal is appropriate to the setting.</p>	No action required.
	Parking is inadequate and Elizabeth Avenue will be congested.	<p>The proposal provides for 448 car parking spaces, in a basement car park and roof deck car park. Traffic and Parking studies indicate that this is sufficient parking to accommodate the uses on the site and therefore, the proposed development will not impact on-street parking.</p> <p>The traffic study by Aurecon has also shown that the development will not adversely impact traffic along Elizabeth Avenue.</p>	<p>No action required at this time.</p> <p>Any traffic management will be implemented as per the application and/or any conditions attached to an approval.</p>

Submission	Issues raised	Response/Comments	Action
Mr D Bayliss (cont)	The site access to Marion Road will impede traffic flows and exacerbate peak hour bottlenecks.	A comprehensive traffic study has been undertaken in respect to the proposal and this demonstrates that the surrounding road network and intersections will be able to function with minor signal changes and a stacking lane extension.	No action required at this time. Any traffic management will be implemented as per the application and/or any conditions attached to an approval.
	There is a lack of green space in the vicinity.	The main open space in close proximity to the site is the former rail corridor that is developed as a major linear park with a formed cycle pathway. This is located approximately 250 metres to the north-east of the site. Furthermore, the proposal will include non-traditional community spaces such as cafes and plaza areas where people can congregate and recreate. This development is about creating "place" in the community.	No action required.
Mr C Legg		Noted that this submission was presented specifically in relation to the 2009 proposal. No amended submission has been received.	
	Concerns that the proposal does not qualify as a TOD proposal.	The "30 Year Plan for Greater Adelaide" identifies TODs and Transit Corridors. A transit oriented development is higher density, mixed use development centred on a major public transport access point. The transit corridors are corridors within 800m of a fixed line mass transit, and/or are characterised by main road access with mass transit such as frequent buses or trains. The subject site is very well serviced with public transport. Nineteen different bus routes operate on the roads surrounding the site. Both Marion Road and Anzac Highway are dedicated "Go Zones" with bus services every 15 minutes. These buses provide connections to the south western suburbs, and also with the Arndale shopping centre, the Marion shopping centre, Flinders University, Paradise Interchange, Tea Tree Plaza and the Golden Grove village interchange. The site is also within 200m of the Tram (fixed line mass transit) that connects the Entertainment Centre and Port Road with the CBD and Glenelg. The proposal is considered to meet the terms of a TOD/Transit Corridor development.	No action required.

Submission	Issues raised	Response/Comments	Action
Mr C Legg (cont)	The Glenelg tram is currently standing room only.	Tram scheduling is beyond the scope of this proposal; however a critical mass using public transport will underpin service improvements.	No action required.
	The bicycle lane on Marion Road is discontinued before reaching the site.	The provision of bicycle lanes is beyond the scope of this proposal although bicycle parking is provided for as part of the proposal.	No action required.
	Entry to car park from Marion Road needs to provide for safety of cyclists.	The traffic study supports the entry/exit to and from the site along with internal movements. Changes will be made to the entry from Anzac Highway in accord with DPTI comments.	No action required for Marion Road entries.
	Residential waste handing is unworkable	Residential waste is to be deposited in to communal bins and collected by private providers. This is a common approach to waste management in apartment and commercial developments.	No action required.
	Construction hours must be enforced.	Construction will be undertaken in accord with all relevant policies, legislation, guidelines and approvals.	Construction will be undertaken in accord with all relevant policies, legislation, guidelines and approvals.
	Statistics for traffic modelling are outdated and the modelling is incomplete. Confirm that delivery vehicles are of a size that they can operate on Marion Road and Anzac Highway without formal approval. Questions the impacts on Anzac Highway/Marion road intersection and Elizabeth Avenue and in particular the school zone.	The proposal has been comprehensively (including the delivery aspects) assessed by Aurecon in accord with the parameters established by the Department of Planning, Transport and Infrastructure as at 2012. It is considered therefore that the traffic modelling is entirely appropriate. Trucks servicing the site are standard delivery vehicles that do not require special permits. The traffic study by Aurecon has also shown that the development will not adversely impact traffic along Elizabeth Avenue. A comprehensive traffic study has been undertaken in respect to the proposal and this demonstrates that the intersection will be able to function with minor signal changes and a stacking lane extension.	No action required at this time. Any traffic management will be implemented as per the application and/or any conditions attached to an approval.
	Parking analysis is incomplete.	The proposal provides for 448 car parking spaces, in a basement car park and roof deck car park. Traffic and Parking studies indicate that this is sufficient parking to accommodate the uses on the site and therefore, the proposed development will not impact on-street parking.	No action required.

Submission	Issues raised	Response/Comments	Action
Mr C Legg (cont)	Analysis of demand for serviced apartments is lacking.	<p>This seems related to the original proposal.</p> <p>The amended proposal includes 26 serviced apartments for short term accommodation.</p> <p>Figures from the SA Tourism Commission (hotels, motels, guest houses and serviced apartments) for the year ended June 2012, show that Adelaide currently has 7255 rooms (considering establishments of 15 or more rooms). Demand for rooms is 1,800,000 room nights per annum. This was an increase of 2.7% over the previous 12 months and equates to an occupancy rate of 71%. Although occupancy was down 1% from the previous 12 months, revenue and takings both increased. New tourism product is a key priority for the South Australian Tourism Commission. This project will add high quality new accommodation product to the State's supply.</p>	No action required.
	The retail analysis does not take into consideration Harbour Town, Jetty Road or Castle Plaza.	<p>As is stated in the Amendment to the Development Report, Harbour Town is sufficiently distant and, of a primarily specific form of retail such as to not be significantly impacted by or impact upon the proposal.</p> <p>Jetty Road is also largely a destination shopping precinct and is unlikely to be significantly impacted by or impact upon the proposal.</p> <p>Castle Plaza beyond the catchment expected for this proposal.</p>	No action required.
	Does not agree with the employment figures.	All employment projections are qualified and sourced in the Amendment to Development Proposal Report.	No action required.
	Project Naming	This comment relates specifically to the original notification of the proposal. This is not applicable to the current notification and is beyond the control of the proponent.	No action required.

Submission	Issues raised	Response/Comments	Action
SA Water	<p>No specific comments relating to this proposal but includes a number of generic comments such as the need for WSUD to be included, the need for rainwater tanks, stormwater management in a general sense, water and sewer main metrics, and groundwater protection.</p> <p>Other comments such as those pertaining to Rural Living allotments are not relevant to this proposal.</p>	<p>Application proposes to include WSUD principles.</p> <p>The site can be adequately supplied with water.</p> <p>Rainwater tanks (100,000 l) are proposed to be incorporated underneath the down ramp in the basement car park. These will act a temporary storage buffer, and a permanent source of water for on-site reuse.</p> <p>Stormwater will be managed as is outlined in the Development Report and the Amendment to the Development Report and will have first flush treatments and other quality improvements to ensure it is suitable either for re-use or discharge.</p> <p>Water and sewer supply mains will be provided at the stipulated diameters.</p>	These issues can be reinforced via conditions of approval if necessary.
South Australian Metropolitan Fire Services	Generally supports the proposal and notes its previous comments have been addressed.	Noted	No action required.
	Has the resources/capacity to respond to development.	Noted	No action required.
Renewal SA	Seeks an LMA to confirm commitment to affordable housing.	<p>Whilst the project is attempting to provide affordable housing that would under ordinary circumstances meet the terms of the Government's policy of affordable housing there is no specific requirement for this proposal to comply with the terms of affordable housing.</p> <p>On this basis the proponent does not believe it is necessary to enter into an LMA and does not wish to do so.</p> <p>The provision of affordable housing on this site, in excess of that which the government would seek to require elsewhere is a gesture of goodwill and we respectfully request that it is treated as such.</p>	No action required.

Submission	Issues raised	Response/Comments	Action
Environment Protection Authority	The proposal does not adequately address the project guidelines in respect to the contribution to the Urban Forest programme, and WSUD.	<p>The proposal is for a mixed use medium density development. It will provide accommodation and services in an infill setting, thus reducing the demand for greenfield development.</p> <p>The landscape detail is proposed to be further developed as part of the detailed design.</p> <p>The plantings are suggested to include architectural species to complement the plantings at the highway Hotel and to tie the development together.</p> <p>Some locally indigenous species can be included to support the urban forest programme.</p>	<p>Further consideration will be given to indigenous plant species for green walls and on-site landscaping as part of the detailed design for building rules consent.</p> <p>Drought tolerant species and indigenous plant species will be considered and can be included as a condition of approval.</p>
	<p>Seeking additional clarification of stormwater management and in particular details of first flush.</p> <p>Seeking confirmation that stormwater quality will comply with the EP (Water Quality) Policy 2003 and specifically sediment management.</p>	<p>The first flush will be managed and further consideration given to this in the design.</p> <p>In addition it is expected that the site will incorporate gross pollutant traps, and oil and plate separators to ensure that the water quality outcomes are achieved.</p>	The development will comply with water quality legislation and details will be provided as part of the detailed design for building rules consent. This can be conditioned if required.
	Seeks details about stormwater management during construction.	<p>A construction management plan was included as part of the original Development Report and a framework provided in the Amendment.</p> <p>A final construction management plan will be prepared as part of the construction contract.</p> <p>As is stated in the Amendment Report stormwater will be filtered and reused. Sediment will be controlled via the use of straw bales, geotech fabric and physical barriers. This will be further detailed in the final CEMP. Any excess water will be discharged, however it is acknowledged that the quality of the water will need to be acceptable.</p> <p>In summary stormwater will be managed during construction such that pollutants and sediments do not end up in waterways and flooding does not occur.</p>	<p>The development will provide for responsible stormwater management during construction and this can be conditioned if required.</p> <p>The previous CEMP is still applicable, but a project specific CEMP for the current proposal is to be developed</p>

Submission	Issues raised	Response/Comments	Action
Environment Protection Authority (cont)	Seeking clarification about groundwater levels.	Initial geotechnical investigations indicated that ground water is located at 3.0m + below the ground level and at this stage dewatering is not anticipated. This will be further considered and addressed as appropriate at the building rules consent stage following additional geotechnical investigations.	Further action required as part of the building design and documentation.
	Suggests that air quality monitoring should be undertaken and identifies potential solutions to manage air emissions including mounds and barriers, buffers, and architectural elements and design.	As stated in the Amendment Report the requirement to comply with NEPM Air Quality measures is understood. Air quality and odour monitoring will be undertaken in accord with the DEMP and CEMP in conjunction with an assessment of meteorological conditions. Mitigation will be included in the development if and as necessary.	Further investigation will be required as part of the detailed design stage for building rules consent.
	Construction dust management plan suggested.	Dust management during construction is included as part of the draft CEMP and will be further detailed and the final CEMP. Dust will be suppressed by using recycled stormwater to dampen materials.	Dust management will be fully detailed in the final CEMP.
	Seeks details about the interface between commercial and residential land uses on site. Suggests that the proposal incorporate the requirements of the Minister's specification SA 78B Construction requirements for the control of external sound (Feb 2013)	The site has been holistically designed as a mixed use precinct. To this end many of the issues around the interfaces have been accommodated and managed via design. For example the residential properties have separate entries and car parking, commercial and domestic traffic is segregated, servicing is sleeved and/or removed by distance from the residential aspects of the development and neighbouring properties, and the residential areas can be secured. As outlined in the Amendment Report, the commercial properties will be specifically air-conditioned and vented to ensure that odour emissions are not likely to cause nuisance. Plant and equipment used on the site will be selected having regard to acoustic performance and/or will be enclosed. The residential properties will have appropriate acoustic treatments to ensure a reasonable residential amenity. The Minister's specification will be considered as part of the detailed design for building rules consent.	Relevant acoustic design treatments will be considered and included as part of the detailed design for building rules consent.

Submission	Issues raised	Response/Comments	Action
Environment Protection Authority (cont)	<p>Recommends a site history be undertaken for the site given the length of time since the last one occurred.</p>	<p>The proponent has controlled the land since the time of the last site history and can verify that the land uses on the site have not altered.</p> <p>The site conditions from a contamination perspective therefore will not have changed and it is therefore contended that an additional site history is not required at this time.</p> <p>Enquiries further to the site history report prepared by GHD indicate that it is considered relatively unlikely that there is any contamination on the site.</p> <p>Previous geotechnical work by Coffey Geotechnics in 2008, included drilling boreholes to 19.35m depth. This report gave no indication of contamination indicators such as odours, staining, ash, cinders or buried waste. GHD has advised that if ash is present is it likely to be the top 300mm of soil.</p> <p>In order to ensure the issue of contamination is addressed, an intrusive instigation will be undertaken at the site including the testing of excavated material. Reports of the testing will be provided to the appropriate authorities and, if and as required appropriate levels of remediation performed.</p>	<p>Intrusive testing will be required as the development progresses to the construction phase.</p> <p>Remediation will be undertaken if, and as necessary.</p>
	<p>Notes that the three bin system is best suited to low density development not apartments and that there are generally lower levels of recovery associated with medium density development.</p> <p>Working with PCA and Renewal SA to provide a guide to waste management in medium density and mixed use developments that will provide guidance on safe and convenient recycling, vehicle access, collection areas etc.</p>	<p>It is not proposed to rely on the Council's three bin system due to the mixed use nature and density of development.</p> <p>It is proposed to manage waste on site via communal bins both for recyclables and residual waste that will be managed by a third party provider.</p> <p>This will be the system for both the commercial tenants and the residential tenants, however each will have a dedicated waste management system.</p> <p>A three bin system will be used where appropriate although the serviced apartments and Anzac Highway tower may incorporate waste chutes. It is proposed to have 2 x 660 litre general waste and recycle bins and 1 x 360 litre green waste bin.</p> <p>Businesses will be encouraged to consider green purchasing to minimise waste generation.</p>	<p>No further action.</p> <p>Plans have been amended to show locations of waste receptacles.</p>
Transport Services	<p>The Aimsun modelling is considered to be satisfactory.</p>	<p>Noted</p>	<p>No action required.</p>

Submission	Issues raised	Response/Comments	Action
Transport Services (cont)	Suggests that access/egress to Marion Road from Mable Street and Elizabeth Street be restricted to left in/left out by closing the median openings and the right hand turn lane from Marion Road for vehicles turning in to Anzac Hwy to head east should be extended to maximise storage in this location.	<p>The Aurecon traffic analysis indicates that there are minimal delays for traffic using Elizabeth Avenue and that there are sufficient gaps in the traffic along Marion Road to allow vehicles to access Marion Road without impacting on through movement traffic.</p> <p>Given that full movements at Elizabeth Street are considered to be essential and there are no traffic impediments to retaining full movements it is suggested that this intersection should remain unaltered.</p> <p>There is no evidence in the Aurecon Report that the storage capacity for the right hand turn lane from Marion Road for vehicles turning in to Anzac Hwy to head east would be inadequate and should be increased as a result of this proposal.</p> <p>Accordingly this is considered to be beyond the scope of this development.</p>	<p>Agree to close the median at the junction of Mabel Street and Marion Road post completion of the development upon confirmation of need.</p> <p>Require costs to be agreed prior to works being undertaken.</p>
	Suggests that site entry to/from Anzac Hwy has been moved to align with median break and that this would allow full movements. The RH turn from the site to Anzac Hwy is not supported and it is suggested that the median be modified to prevent this turn.	<p>The site entry point was moved to accommodate three additional car parking spaces. This can be moved back to the existing point and the car parking spaces provided to the west as required.</p> <p>Unlawful or illegal manoeuvres would be a matter for the police and accordingly the proponent rejects the need for it to modify or close the median in this location and considers that this is a matter for DPTI.</p>	Plans have been amended to locate the western most entry/exit point from Anzac Hwy in its current position.
	A left turn deceleration lane shall be provided at the Marion Road access to the car park. This shall be designed in accordance with the Austroads Guide to Road Design Part 4A and DPTI standards.	<p>Aurecon assessed the access to the site as is shown on the plans forming part of the Amended Development proposal. These plans show a deceleration lane of some 25m in length.</p> <p>The 25m deceleration lane complies with clause 8.3.2 for short auxiliary lane on a major road.</p> <p>Aurecon was satisfied on this matter.</p>	<p>Agree to ensure that the deceleration lane at the Marion Road access to the car park will be designed in accord with the Austroads Guide to Road Design Part 4A and DPTI standards.</p> <p>This can be required by Condition.</p>
	Suggest that the proposed bus bay on Anzac Hwy be relocated immediately downstream of the entry and the taxi stand further south west.	Do not object.	Amended plan shows the relocated bus stop and taxi rank.

Submission	Issues raised	Response/Comments	Action
Transport Services (cont)	<p>Separate right turn phase to be provided at Marion Road/ Anzac Hwy intersection for the eastern approach.</p> <p>Increase phase times for Right Hand turn from Anzac Hwy into Cross Road</p>	Acknowledge requirement for these identified treatments to be implemented.	<p>Agree for these treatments to be implemented upon completion of the project should the need be justified.</p> <p>Require confirmation of costs prior to implementation.</p>
	Extension of Right Hand turn lane on the Anzac Hwy western approach by 20m	Acknowledge requirement for this identified treatment to be implemented.	<p>Agree to this treatment to be implemented upon completion of the project should the need be justified.</p> <p>Require confirmation of costs prior to implementation.</p>
	Does not accept position in Amendment Report that this is contrary to the principles of a TOD.	Noted	<p>The traffic interventions set out below can be required by conditions of consent.</p> <p>Separate right turn phase to be provided at Marion Road/ Anzac Hwy intersection for the eastern approach.</p> <p>Increase phase times for Right Hand turn from Anzac Hwy into Cross Road</p> <p>Extension of Right Hand turn lane on the Anzac Hwy western approach by 20m</p>
	The angle of the entry to Anzac Hwy should be modified to reduce vehicle entry speeds.	The assessment of the car parking and entry/egress arrangements by Aurecon did not raise this as an issue. Notwithstanding, it is considered that this can be addressed during the detailed design phase for building rules consent.	This can be addressed via a condition.

Submission	Issues raised	Response/Comments	Action
Transport Services (cont)	The 13 car parking spaces (5 to the south and 8 to the north) between the access and the first intersecting car park aisle should be removed to improve traffic flow into the site. The 3 spaces adjacent the two way car park access on Anzac Hwy should be deleted in order to minimise the potential for interference with the traffic flow through the site.	The assessment of the car parking arrangements by Aurecon did not raise this as an issue.	No action required.
	Service vehicles of 19m should be accommodated on site.	Enquiries of major supermarket retailers indicate that the 19m vehicle is not the preferred delivery vehicle with the preference being for 14m semitrailers and 12.5m rigid vehicles. Notwithstanding the design will enable a 19m vehicle to manoeuvre into the location we designated as the loading bay by nosing into Elizabeth Avenue and reversing into the dock. On the basis that this is not the preferred delivery vehicle it is suggested that this is sufficient and that no changes are required.	No action required, 19 m can access the loading docks.
	Suggests that although road widening is identified in this locality at this time it appears unlikely that this land will be required from this site. Nevertheless development within the road widening distance will require approval of DPTI.	Noted.	Consent of the commissioner will be sought as required.
	Signs on the site must not interfere with existing traffic control devices, provide glare or distraction. No element of LED or LCD shall be included in the design of any signs.	Noted. This is an issue for subsequent applications.	No action required.
	Seek sufficient land being set aside along Marion Road and Anzac Hwy to provide DDA compliant footpaths. New footpaths should be no narrower than existing footpaths and shall be vested in Council or DPTI at no cost.	An 1800mm wide footpath in accordance with AS1428 can be provided to allow sufficient width for the passing of 2 wheelchairs.	Agree to provide sufficient land for DDA complaint footpaths along Anzac Hwy and Marion Road.

Submission	Issues raised	Response/Comments	Action
Transport Services (cont)	All redundant crossovers shall be reinstated.	Any redundant crossovers will be reinstated.	The can be addressed via a condition.
	On-site parking should be designed to A/NZ standard 2890.1:2004, line marked and signed.	The car parking spaces have been verified by Aurecon. The need to meet the standard is acknowledged.	A condition can be included to show this requirement.
	Bike parking facilities should be provided in accord with AS 2890.3-1993 and the Austroads, guide to traffic engineering practice Part 14 bicycles.	Aurecon has verified the bicycle parking facilities on the site are suitable. The bicycle facilities will be designed to comply.	A condition can be included to show this requirement.
	Trailer mounted variable signs shall not be used on or adjacent the subject site for advertising purposes.	The proponent cannot control third party trailer mounted signs off site and therefore this should not be imposed as a condition. In any case, Council's by-laws preclude signs mounted on vehicles on the footpath, verge or Council property.	No action required.
	Stormwater shall not be allowed to discharge onto the surface of Marion Road or Anzac Hwy.	Stormwater will be discharged appropriately through an underground detention and pipe system.	A condition can be included to show this requirement.
	Pedestrian safety should be considered in light of uncontrolled pedestrian movement from the site.	Pedestrian access surrounding the site will be via footpaths directing crossing of major roads to formal controlled pedestrian crossings at the intersection.	No action required.
West Torrens City Council	The Council suggests that the proponent should be responsible for the cost of street scaping works to Elizabeth Avenue.	The proponent is not obliged to fund additional works to the streetscape but is happy to enter such discussions on a without prejudice basis with the Council.	At the detailed design stage the proponent will negotiate with the Council in relation to streetscape works on Elizabeth Avenue.
	Way finding signs should be included to assist with access to the nearest tram stop. Concerns that pedestrians will need to double back to cross with the pedestrian crossing.	Way finding signage is proposed to be included in the project and will be detailed as part of the detailed design. Pedestrian safety was considered as part of the pedestrian network planning. As a result of this work it was determined that pedestrian safety would be maximised by encouraging the use of formed footpaths and crossing at identified and signalised pedestrian crossings. Mechanisms to prevent able bodied persons to cross away from the pedestrian crossing have been discounted as they could provide a physical barrier that would result in entrapment in the middle of the road.	Way finding signs will be included as part of the detailed design.

Submission	Issues raised	Response/Comments	Action
West Torrens City Council (cont)	Suggests more work should be undertaken in relation to pedestrian movements and in particular how pedestrians will access the development from Elizabeth Avenue.	<p>Pedestrian access is guided by the footpaths surrounding the site that, with way finding signs will direct pedestrians to the main entry points.</p> <p>Access was not specifically designed from Elizabeth Avenue in order to maintain the residential feel and character of the street. This position of no direct access to the centre from Elizabeth Street is supported by the South Adelaide Christadelphian Ecclesia Inc.</p> <p>Residences in the towers on Elizabeth Avenue were specifically designed to fit into the increasing residential character. Like all residents in the areas these residents will be familiar with the area and way finding to the retail precinct will not be difficult along well formed sealed footpaths.</p>	No action required.
	The proposed development encroaches into the residential zone. How will this impact existing residents?	<p>A small portion of the site in the south western corner is zoned residential. In designing the proposal the western residential tower was situated in this corner to ensure a residential interface to these properties to the west.</p> <p>The design ensures that overshadowing and overlooking is managed appropriately.</p> <p>Opposite the four residential properties located on the corner of Marion Road and Elizabeth Avenue, another residential tower is proposed again to maintain the complement the residential feel.</p> <p>The main activity of the site is concentrated to the Marion Road and Anzac Hwy frontages to buffer the more residential areas.</p>	No action proposed.
	Seeking detail of WSUD initiatives and request discussions with Council's assets department.	<p>Water sensitive urban design principles will be employed as part of the proposal and will be further detailed as part of the more detailed design process.</p> <p>The proponent is more than happy to discuss this further with the Council.</p>	WSUD principles will be included in the detailed design and consultation will be undertaken with Council.
	Council requests a CEMP.	<p>A draft CEMP has been provided as part of the application process however will be refined and finalised as part of the detailed design and contracts.</p> <p>The proponent can liaise with Council staff as part of the refinement of this document.</p>	<p>Draft CEMP has been provided.</p> <p>CEMP will be refined and provided.</p>

Submission	Issues raised	Response/Comments	Action
West Torrens City Council (cont)	Would like access to accommodate a 19m semi-trailer.	<p>Enquiries of major supermarket retailers indicate that the 19m vehicle is not the preferred delivery vehicle with the preference being for 14m semitrailers and 12.5m rigid vehicles.</p> <p>Notwithstanding the design will enable a 19m vehicle to manoeuvre into the location we designated as the loading bay by nosing into Elizabeth Avenue and reversing into the dock.</p> <p>On the basis that this is not the preferred delivery vehicle it is suggested that this is sufficient and that no changes are required.</p>	No action required, 19 m can access the loading docks.
	Waste removal needs further details, in particular Council suggests that waste removal provisions are not readily apparent for areas other than the West Tower.	<p>It is not proposed to rely on the Council's three bin system due to the mixed use nature and density of development.</p> <p>It is proposed to manage waste on site via communal bins both for recyclables and residual waste that will be managed by a third party provider.</p> <p>This will be the system for both the commercial tenants and the residential tenants, however each will have a dedicated waste management system.</p> <p>A three bin system will be used where appropriate although the serviced apartments and Anzac Highway tower may incorporate waste chutes. It is proposed to have 2 x 660 litre general waste and recycle bins and 1 x 360 litre green waste bin.</p> <p>Businesses will be encouraged to consider green purchasing to minimise waste generation.</p>	<p>No further action.</p> <p>Plans have been amended to show locations of waste receptacles.</p>

Submission	Issues raised	Response/Comments	Action
West Torrens City Council (cont)	<p>Council queries the traffic management and impacts generally.</p> <p>Specifically it queries the range of interventions tested, and suggests that not being able to access the site from the west from Anzac Hwy will create circuitous traffic flows that impact Elizabeth Avenue, suggests that service vehicles will use Elizabeth Avenue, and suggests that on street car parking will need to be removed from Elizabeth Avenue.</p>	<p>The Aimsun traffic modelling was undertaken by Aurecon based the model being approved by DPTI.</p> <p>This modelling looked at the network along Marion Road (from north of Mooringe Avenue and south of Cross Road), Anzac Hwy (east of the Marion Road Intersection and west of Cross Road/Stonehouse Avenue) and Cross Road (between Anzac Hwy and Winifred Avenue).</p> <p>The modelling included a base model, and future scenarios for 2016 and included an intervention case that considered treatments (as are set out on page 19 of the Aurecon Report) to ensure that the function of the road and in particular the Marion Road Anzac Hwy intersection was not impeded.</p> <p>Traffic impacts upon Elizabeth Avenue and other local streets were also specifically considered by Aurecon. This found that the impact on local streets was insignificant and did not identify a need to remove on-street parking along Elizabeth Avenue.</p> <p>Service vehicles are unlikely to use Elizabeth Avenue as the exit from the service lane will be designed to encourage all vehicles to turn left following which they can exit to Marion Road.</p> <p>Overall Aurecon found that the traffic impacts of the proposal are able to be managed to ensure there is no significant major impact on the traffic network.</p>	Action as per responses to DPTI Transport Services submission above.
	<p>Concerns about inadequate parking. Questions the parking rates contained within the BDP policy library modules, the amount of car parking for the Highway Hotel and the need for dedicated spaces.</p> <p>Based on Council's own assessment the proposal is 66 car parking spaces short.</p>	<p>Traffic and parking has been extensively assessed by Aurecon (including application of a higher rate for car parking associated with the supermarket (4.5/100m²) than is required by the Government's Development Plan modules (3/100m²)) and both are considered to be appropriate and sufficient.</p> <p>Based on the assessment by Aurecon the proposal provides a couple of spaces more than the predicted demand.</p> <p>Council's calculations use different and typically higher car parking rates per land use than those adopted by the BDP policy library and therefore the Aurecon assessment.</p> <p>The parking provision on site is therefore considered to be appropriate.</p>	No further action.

5. CONCLUSION

In conclusion, the refinement of the design, with the additional amendments outlined above has enabled the proposal to now address the key issues raised. Specifically the project provides a corridor development that will comprise a mix of uses leading to a vibrant community and centre.

The development will support the use and patronage of surrounding public transport and traffic impacts can be managed.

The design provides for a landmark development that appropriately transitions from typical suburban development to more responsive corridor development – sensitively increasing the density on the site.

The building form maximises the visual interest and minimises intrusions from the perspective of visual amenity, scale, bulk, overlooking and overshadowing.

The development will employ green building design techniques and provide a benchmark for future corridor developments.

The development will lead to the attainment of Government objectives of the 30 Year Plan for Greater Adelaide through increasing population, providing affordable housing, increasing services and walkability, support public transport use and provide for increased sustainability.

The proposal is commended for approval.

APPENDIX 1

COPIES OF SUBMISSIONS

Department of Planning.

118 JUN 2013

Re your planning for corner of Marion Rd, & Anzac Highway. I would say your off your minds 100% percent. Why such a plan for one of the busiest corners in Adelaide so many buildings - people - cars, Highway Inn pretty new?? Cars parked for Pokies??

Cars are back up to Richmond Rd from other side of Cross Roads. Where will cars be parked for coffee???

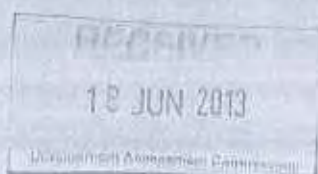
There's a big block (waiting for years) in North Adelaide to be developed, but the Western suburbs are pushed smaller & smaller all the time. Even housing blocks!

Leave this alone (altogether). Let us have some space somewhere.

Developers are a nuisance to all Society.

West Torrens Rate Payer
(and that they really care either)

V. B. Paschalis



Sharon Seigert

From: Helen Dyer
Sent: Tuesday, 11 June 2013 12:00 PM
To: Sharon Seigert
Subject: Fwd: Proposed Plympton mixed use development

Can you please save to file and print out for me please.

Ta h

Helen Dyer
Principal
Connor Holmes

Begin forwarded message:

From: "Alliu, Yasmine (DPTI)" <Yasmine.Alliu@sa.gov.au>
Date: 11 June 2013 12:15:46 PM AEST
To: Helen Dyer <hdyer@connorholmes.com.au>
Subject: FW: Proposed Plympton mixed use development

Hi Helen

Another rep

Cheers Yasmine

-----Original Message-----

From: Zuidland, Sara (DPTI) On Behalf Of DPTI:PD DAC & Major Developments Panel
Sent: Tuesday, 11 June 2013 11:30 AM
To: Alliu, Yasmine (DPTI)
Subject: FW: Proposed Plympton mixed use development

Sara Zuidland
Department of Planning, Transport and Infrastructure Tel 08 8303 0771 | Fax 08 8303 0753 |
Email sara.zuidland@sa.gov.au

-----Original Message-----

From: lynner@virginbroadband.com.au [<mailto:lynner@virginbroadband.com.au>]
Sent: Monday, 10 June 2013 6:33 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Proposed Plympton mixed use development

To whom it may concern,

I am a resident in South Plympton and am in close proximity to the proposed development on the corner of Marion Road and Anzac Highway. I do not own a car and rely solely on public

transport, my bike, or walking.

I support the proposed redevelopment of this area, both for the environmental considerations given to the design, the thinking in the provision of bike parking facilities, and also the provision of retail food outlets to the area. The addition of another supermarket will be very beneficial to the local community.

Lynne Rutherford
2/439 Marion Road, South Plympton
8371 5234



29 May 2013

1/413 Marion Road
FLYMPTON
SA 5038

Planning Director

Roma Mitchell House
133 North Terrace
Adelaide SA 5000

GPO Box 1616
Adelaide SA 5001

Telephone: (08) 8255 1331
Fax: (08) 8255 1331

www.dpti.sa.gov.au

Dear Occupier

Applicant:	The Palmer Group
Major Development:	Proposed Plympton Mixed Use Development Anzac Highway/Marion Road - Plympton
Subject Land:	The proposal is located on a site bounded by Elizabeth Avenue to the south, Anzac Highway to the northwest, and Marion Road to the northeast. The site comprises current Certificate of Title References (5104/701, 5104/702, 5104/700, 5450/453, 5457/209, 5104/703, 5374/188, 5427/767, 5077/46, 5560/492, 5486/281, 5043/137, 5043/138, 5043/139 and 5043/140).

In 2009 a proposal to develop the Highway Inn site was publicly exhibited. The applicant in response to submissions received has now revised the proposal. The development proposes to create a mixed use development (in 3 stages) comprising 108 residential apartments in three towers (where previously there was one), including dedicated affordable and serviced apartments, a supermarket, retail and commercial uses. Associated car parking is proposed over three levels, at basement level, ground level and level 1, including ground level bicycle parking facilities.

As an adjoining owner/occupier who could be potentially affected by the development you are invited to view details of the revised proposal and make comment should you desire to do so. The revised proposal is contained within the applicant's Amendment to the Development Report, which is being released for public comment on 29 May 2013. The Amendment to the Development Report may be examined during normal business hours from this time at the office of the Development Assessment Commission, Level 5, Roma Mitchell House, 133 North Terrace, Adelaide (opposite Adelaide Railway Station), and at the office of West Torrens Council, 165 Sir Donald Bradman Drive, Hilton. The application documentation is also available on the government website: www.sa.gov.au/planning/majorddevelopments

If you wish to comment on the application please submit a written submission. Written submissions commenting on the revised proposal are invited until 5pm on Wednesday 19 June 2013 and should be addressed to:

Minister for Planning,
C/-: Mr Robert Kleeman, General Manager, Assessment,
Department of Planning, Transport and Infrastructure,

GPO Box 1815 ADELAIDE SA 5000
Or sent via email to: daacadm@sa.gov.au

Submissions received during the public consultation period will be provided to the proponent for preparation of a Response Document. Submissions may also be made available for public inspection. Please indicate in writing if you object to your submission being made available in this way.

Should you have any enquiries in relation to this matter, please do not hesitate to contact Yasmin Aliu of this office on (08) 8204 8399 or email yasmin.aliu@sa.gov.au

Yours faithfully



Robert Kleeman
GENERAL MANAGER - ASSESSMENT
as delegate of the
MINISTER FOR PLANNING

South Adelaide Christadelphian Ecclesia Inc.

*Cnr Elizabeth Avenue & Alice Street
PLYMPTON SA 5038
Mail address: PO Box 256 PLYMPTON SA 5038
ABN: 28 125 847 221*

*Email: southadelaide@aace.info
Phone: 08 8390 1032
Mobile: 0412 603 332*

18th June 2013

Department of Planning
GPO Box 1815
ADELAIDE SA 5001

ATTENTION : Yasmine

Submission for consideration concerning the Plympton Re-development re Christadelphian Church on Elizabeth Avenue

Relevant facts :

- Our church has been located in this position in Elizabeth Avenue for 85 years
- Our group has been worshipping at this site for 36 years
- Access to the church building is via two entrances on Elizabeth Street
- Our congregation includes elderly people who find walking difficult
- We also have young families with children
- Our building is used for all of our religious services including Sunday School, youth activities and as a meeting room for secular community activities
- We were approached when this re-development was first mooted and there was interest expressed in purchasing our church property for the purpose of building car parking facilities. We were not entirely opposed to relocating if a suitable alternative was found. This was not pursued by the developers after the initial contact.
- As it is now, exiting Elizabeth Avenue onto Marion Road is quite hazardous, particularly when vision to the south is blocked by a bus. Because of this, some of our members who live to the south, have been forced to travel west along Elizabeth Avenue back through the confined streets of the suburb to access Cross Road at a safer point. Any increase in the traffic coming from the west along Elizabeth Avenue to access this new development, will also find this a problem and will be doing U-turns in Elizabeth Avenue to follow the route as we have learned by experience, rather than trying to turn right onto Marion Road. Travel along Elizabeth Avenue and the other side streets to the west is going to increase, as access into this triangulated area is quite limited.

Our concerns are as follows :

On viewing the proposal, we feel that we may find great difficulties in parking close to our church building, as Elizabeth Ave is being described as :

- an exit for trucks that service the supermarket

- access to underground parking to service the south east tower
- access to the parking area for the western tower
- the rear entry point to the supermarket and specialty shops - This rear access to the supermarket is almost opposite one of our entries into our building. Because this is an easy access to the supermarket, our concern is that local residents driving down Elizabeth Avenue will park in any available parking spaces in Elizabeth Avenue and Alice Street. This will make use of our church impossible if we don't have some parking spaces available to us.

We need a solution to this very obvious problem, as at the time of writing, our facilities may be used on Tuesday (7pm to 10pm); Wednesday (7pm to 10.30pm); Saturday (anytime from 8am to 11pm), Sunday (all day 8am to 11pm) and many other occasional uses. How can we function as a church and community centre when we can't get the people we care for near the building.

Some of our concerns about Elizabeth Avenue do get a mention under "Areas of concern" in the proposal, but the "Action/Response" is at best evasive, eg "Further detailed traffic analysis and modelling has been undertaken that demonstrates little negative impact etc."—obviously not done when the streets are full of tram commuters' cars.

As far as consultation with the community—we have not heard from them since their quick visit back in 2009. This has left us wondering as to our future and viability on our site.

All these problems would be considerably reduced if there was **no access** to the supermarket from Elizabeth Avenue.

We would appreciate contact from the developers regarding this matter. I can be contacted on the above phone and mobile numbers.

Thank you.

Bruce Trenwith

Sharon Seigert

From: Helen Dyer
Sent: Tuesday, 25 June 2013 5:45 PM
To: Sharon Seigert
Subject: Fwd: Plympton Mixed Use Development Anzac Highway Marion Road proposal

Can you please print and save this one too please.

Thanks Helen

Helen Dyer
Principal
Connor Holmes

Begin forwarded message:

From: "Alliu, Yasmine (DPTI)" <Yasmine.Alliu@sa.gov.au>
Date: 25 June 2013 4:39:47 PM ACST
To: Helen Dyer <hdyer@connorholmes.com.au>
Subject: FW: Plympton Mixed Use Development Anzac Highway Marion Road proposal

Late submission

Cheers Yasmine

From: Janice Ough [mailto:janough1@optusnet.com.au]
Sent: Tuesday, 25 June 2013 4:28 PM
To: Alliu, Yasmine (DPTI)
Subject: Fw: Plympton Mixed Use Development Anzac Highway Marion Road proposal

trying again

----- Original Message -----

From: Janice Ough
To: Yasmine Alliu
Sent: Tuesday, June 25, 2013 3:35 PM
Subject: Plympton Mixed Use Development Anzac Highway Marion Road proposal

Dear Yasmine

Thankyou for your time and consultation this morning regarding the development plans for the corner of Elizabeth Avenue and Marion Road. I would make comment here that 3 weeks is not sufficient time to capture the comments of the community that are interested in what happens to their place called home due to work, home and community commitments and not to mention this time of the year when there is a tendency to escape the cold by travelling else where.

As I explained to you my property on which my daughter, son in law and grand children live is in Alice street Plympton and will be impacted upon by this development.

I also stated that up until today we as a family unit had no real concerns as we were under the impression that the 5 residential blocks acquired by the developers was for parking purposes and the only concern we had was the trucks going in and out to the supermarket and shopping areas which on the whole has been resolved. I am aware that the current proposal to direct traffic to turn left onto Elizabeth Avenue and left onto Marion Road - -while very good in print how will it be policed?

I am now told the corner block of Elizabeth Ave and along Elizabeth Avenue is where the 108 residential units will be built with an expected influx of 250 people and their cars.

Major concerns:

1. safety of children walking up and down Elizabeth Ave to school - many children arrive by bus and are local and walk to St Johns
2. safety of children walking along Marion Road to school - William Light College in Plympton is an R to 12 school and again many of the students all ages walk to school
3. safety of children already living local and enjoying their community being interrupted by the increase in people, traffic and noise that will be deemed local.
4. Elizabeth Avenue is a very narrow street to adjust to this added traffic load.
5. Currently the local traffic does increase on a daily basis due to workers parking to catch the tram to work - what will happen to this proportion of the community when they will not be able to park
6. Residences and businesses south along Marion Road and all of Alice street have a back entrance along a lane - what can these properties expect from the increased traffic - will it become dangerous for children and others? will it be an alternative for these new arrivals to avoid the congestion at the corner of Elizabeth Ave and Marion Road? (by others I am aware that there is a home for disadvantaged within this area)
7. The complete lack of recreational and neighbourhood services being included in the proposal is of concern when it is expected that 250 people are being introduced to the community - potential for gangs, graffiti, and anything else that can arise due to lack of planning
8. the 5 or 6 storey building (1 place says 6, today you quoted 5) on Elizabeth Avenue is in the proposed medium density housing DPA policy which according to the proposed policy for Housing Diversity should be 4 storeys only.

In conclusion the sadness I feel at the extent of this development not retaining the community opportunities its residents that I experienced as a professional person raising a child by myself 28 years ago when I first moved to this area is very strong and as a Sociologist the potential that this proposal could very easily end in social discord or worse for the local community and the new residents is a very real risk.

Sharon Seigert

From: Alliu, Yasmine (DPTI) <Yasmine.Alliu@sa.gov.au>
Sent: Tuesday, 18 June 2013 6:15 PM
To: Helen Dyer
Subject: FW: Plympton mixed use development

Hi Helen

Another rep

Cheers Yasmine

From: Zuidland, Sara (DPTI) **On Behalf Of** DPTI:PD DAC & Major Developments Panel
Sent: Tuesday, 18 June 2013 5:35 PM
To: Alliu, Yasmine (DPTI)
Subject: FW: Plympton mixed use development

Another rep for you.

Sara Zuidland
Department of Planning, Transport and Infrastructure
Tel 08 8303 0771 | Fax 08 8303 0753 | Email sara.zuidland@sa.gov.au

From: Anthony Woollacott [<mailto:tony.woollacott@gmail.com>]
Sent: Tuesday, 18 June 2013 5:33 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Plympton mixed use development

Minister for Planning
Attention: Robert Kleeman, General Manager,
Assessment Branch
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

Dear Sir

I write in support of the proposed Plympton mixed use development. As a long standing (since 1988) resident of Plympton Park living near the proposed development, I agree with the proponents regarding many of the benefits of this development. I particularly agree with the need for additional shopping facilities in this area accompanied by cafes and similar meeting spaces for this neighbourhood. The proposed full scale supermarket would be particularly welcome on this southern side of Anzac Highway.

Plympton needs a focal point such as that which this development would provide and the mix of shopping and cafes proposed would be very welcome. The proposed apartments appear to be appropriate in the revised proposal and the residents would hopefully make good use of the recent developments which enhance transport options eg new tram services and bikeway.

Yours sincerely

Anthony Woollacott
17 Herbert Street
Plympton Park SA 5038

198 JUN 2

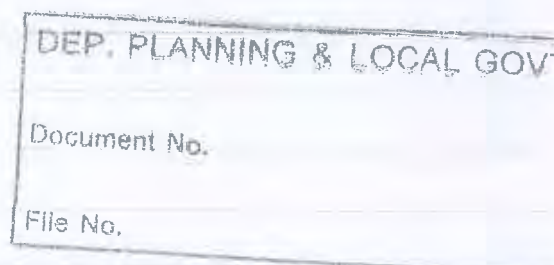
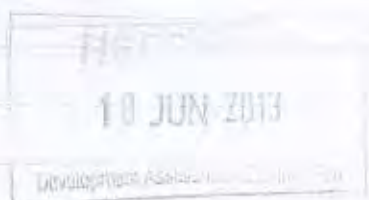
To Whom it may concern,
Dear Sir,

As I live on Marian Road, I protest strongly at the proposed development at the Highway Hotel, Angas Highway.

There is enough traffic on this road at any-time and especially after 2p.m. on a week-day, also in mornings coming from the south. There is too much congestion and regards to traffic impact it has on residents in this and surrounding areas.

The negative impact on residents in the area must be given consideration, we already have trouble getting out of our driveway, and this development elsewhere is not everything in the Western Suburbs.

Florence Biglands,
6/324 Marian Rd.
Wetley. 503



12 June 2013

Minister for Planning
C/-: Mr Robert Kleeman
General Manager, Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000



Dear Sir

Re: Proposed Plympton Mixed Use Development Anzac Highway/Marion Road – Plympton

In response to your letter of the 29th May, 2013 I would like to comment on the changes to the abovementioned development.

I believe the visual impact will be enormous and totally out of character for the surrounding area. The Palmer Group seems intent on forcing the current height and zoning restrictions to be changed to suit themselves.

The plans appear to be deceptive on how many storeys above street level the towers will actually be. Are they 4 storey buildings, or 4 storeys of apartments on top of car parks and shopping/service levels?

The southern streetscape on Elizabeth Avenue is still unacceptable in height and there is no set-back for most of the length, which will do nothing for the aesthetics of the street. Several residential properties the developer purchased earlier, are due to be (or have already been) demolished on Elizabeth Avenue and the land will be completely taken over by the proposed development.

This development will increase population density and add to traffic congestion in an already busy area. It states the local community will benefit from more shops, commercial properties and apartments: all this without consideration for any open space or green areas for recreation in sight!

Why should this proposal be forcing changes to the current council restrictions on height and zoning? I challenge The Palmer Group to re-submit a plan that makes clever and appealing use of the area based on current regulations.

Surely the local community and Council should not be bullied by what The Palmer Group want.

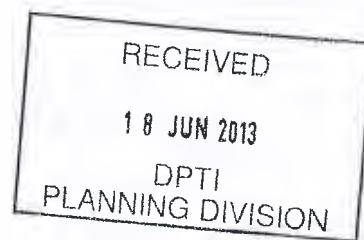
Yours faithfully


IVAN DEN BROEKE

40 Elizabeth Ave
PLYMPTON SA 5038

12 June 2013-06-12

Minister for Planning
C/-: Mr Robert Kleeman
General Manager, Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000



Dear Sir

Re: Proposed Plympton Mixed Use Development Anzac Highway/Marion Road – Plympton

I would like to thank the Minister for informing me of the updated proposal and giving me the opportunity to comment.

As in my previous submission, dated 10th August, 2009 I still have fears and concerns that have not been alleviated with this current application.

As a long term resident of over 30 years in Plympton, I am worried how a development of this size will impact negatively on myself and my family, neighbourhood, lifestyle and property values. I am not a professional or experienced at reviewing plans and therefore rely on such bodies as Council and government departments to diligently scrutinise these proposals to protect my, and residents interests.

According to the proposal, it will add to the amenity of the local area providing serviced apartments, a supermarket, shops, 'affordable units' and offices. This area already has ample supermarkets (within 100m Coles and Centro Kurralta 1km away) and an abundance of affordable units and offices within a stones throw. Therefore having a negative effect on the area. Surely the serviced apartment component should be housed within the hotel complex, thus reducing the size of any other buildings?

The scale of this proposed development is massive and dwarfs anything in the vicinity and therefore does not compliment the existing area. The height of the buildings proposed does not comply with current regulations and therefore is akin to **putting the cart before the horse**. The amount of storeys in the proposal appears deceptive in number. There is no set back planned for Elizabeth Avenue. This, along with the replacement of single storey homes with multi storey buildings will have a major negative effect on our streetscape along with a need to force changes to zoning regulations. It will also impede future widening of Elizabeth Avenue and Marion Road intersections if needed.

The parking is inadequate for this mixed site, forcing overflow parking on to Elizabeth Avenue and surrounding streets. This, as well as the increased apartment and heavy service vehicle traffic, channelled onto Elizabeth Avenue will greatly increase traffic congestion on a narrow residential street.

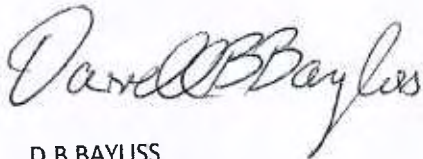
The site access/exit to Marion Road being so close to Anzac Highway will impede traffic flows on Marion Road and exacerbate peak hour bottlenecks, with a deleterious effect on safety and an increasingly busy transport corridor.

A lack of green space/recreation area in the nearby vicinity, further highlight the unsuitability of this site for a proposal of this grandiose scale.

In my discussions with local Councillors and residents, I have noticed an obvious recalcitrance to become involved in reviewing this proposal, due to a perceived inevitability to the developer's application, with many people thinking it is already approved. This may be due to continual press releases in the local Messenger, or the submission process or lack of public consultation.

I therefore call on your department to show true diligence in your assessment of this latest proposal, on a site situated in an area that Mayor John Trainer himself has described as "congested".

Yours faithfully

A handwritten signature in dark ink, appearing to read 'D.B. Bayliss'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

D.B.BAYLISS

40 Elizabeth Ave.

PLYMPTON S.A. 5038

Sharon Seigert

From: Helen Dyer
Sent: Friday, 21 June 2013 9:06 AM
To: Sharon Seigert
Subject: FW: Submission (August 2009) for Plympton North Redevelopment
Attachments: submission.pdf

For file please

Helen Dyer | Principal

www.connorholmes.com.au
www.fyfe.com.au

25 Vardon Avenue Adelaide SA 5000 | T: 08 8232 9088 | F: 08 8232 9099 | M: 0447 004 707

ADELAIDE | BRISBANE | DARWIN

-----Original Message-----

From: Alliu, Yasmine (DPTI) [<mailto:Yasmine.Alliu@sa.gov.au>]
Sent: Thursday, 20 June 2013 4:13 PM
To: Helen Dyer
Subject: FW: Submission (August 2009) for Plympton North Redevelopment

Hi Helen

FYI

Cheers Yasmine

-----Original Message-----

From: Christian Legg [<mailto:cmjl@iprimus.com.au>]
Sent: Thursday, 13 June 2013 10:24 AM
To: Alliu, Yasmine (DPTI)
Subject: Submission (August 2009) for Plympton North Redevelopment

Hello Yasmine,

Thanks for your assistance just now - it is greatly appreciated!

Please find attached a PDF of the submission I made in August 2009 concerning the redevelopment of the Highway Inn at Plympton.

Can you please confirm receipt of this document when you get it?

Though it is not dated in the document, the creation time of this PDF was 10:38 pm on the 12th of August 2009. It was then submitted but I cannot recall if it was done electronically or by post. If I did it by post it may have missed the cutoff date.

I will download the amendment and see if it resolves any of my concerns. Any concerns it does not resolve I shall resubmit as further issues.

kind regards and thanks again

Christian Legg

Christian Legg
8 Arthur Street
Plympton Park 5038

To Whom it Concerns,

Please find enclosed concerns that I have about the proposed Highway Inn redevelopment.

As a resident of the area for 11 years, married with two teenage children, I believe that the area surrounding the Highway Inn has sufficient retail amenity.

I believe that the report provides no justification as to why a six storey tower with 120 apartments needs to be created.

I have concerns that relate to the TOD and traffic impact aspects of the development.

I do not believe that accurate data has been used for the bulk of the traffic analysis, and that some important analysis has been omitted entirely, and that TOD cannot be applied to the development with the current state of public transport in the area. I believe that there is not sufficient assurance that PDC 152 "Centres should have a minimal adverse impact on traffic movements on roads" can be met.

I am also concerned about the lack of definitive statements about the usage of the accommodation.

Throughout this document, I have underlined issues that I expect to receive answers for, or for things that I expect should be done prior to any approval being granted.

The Development should not be able to avail itself of Transport Oriented Development Status at the Current time

Page 8 states that the development will maximise Transport Oriented Development opportunities, being located on bus, tram and cycle routes as well as road routes. This in turn affords the development certain concessions in terms of parking and traffic flows.

The location of the development adjacent two main roads, a tram line, a cycle way and multiple bus routes does not, in my mind, qualify it for TOD concessions at the current time, based on the following observations:

1 - The Glenelg Tram is currently "standing room only" between 7 am and 9 am, and then again between 4 pm and 6 pm on weekdays, to and from the stop on Marion Road. Given that section 3.1 of Appendix C (Traffic Study) estimates that the peak period for retail activity will be between 5 pm and 6 pm on a Thursday evening, TOD benefits will not be accruable from the tram network during peak retail time.

2 - The bicycle lane along Marion road heading North finishes well before the site is reached, forcing cyclists into a bottleneck on Marion road adjacent the site. The site plans in the development report do not indicate a continuation of any bicycle lanes in

the redevelopment. As Marion Road has been identified as the primary entry point for the retail area's parking areas (and I would assume bicycle parking areas), safe access on Marion Road for cyclists must be provided before TOD concessions relating to cycling can be granted.

I should like to know why the development claims to adhere to TOD principles when these issues are apparent, and believe that further justification is required by the developer and/or bicycle lane and tram service remediation work be conducted before any TOD concessions are granted.

Residential Waste Handling as Proposed is Unworkable

Page 17 advises that residential waste handling will be conducted using standard wheelie bins that will be placed onto Elizabeth Avenue by onsite management staff. Assuming full occupancy of units, with completion of 120 apartments at the conclusion of stage two, with each apartment having its own waste and recyclable wheelie bin, there is the prospect of 120 waste wheelie bins being placed onto Elizabeth Avenue one week, then 240 wheelie bins (waste and recycling) being placed onto Elizabeth Avenue the next.

While this number is at the very uppermost range, even a quarter of the number of bins on a recycling day - 60 - is totally unworkable in the length of Elizabeth Avenue intended for pickup.

It must be a condition of approval that the developer and/or operator of the complex provide centralised rubbish collection and handling for all apartments, with a single truck then able to collect the waste, as per the system proposed for the retail and commercial areas of the development.

Construction Noise and Times Must be Enforced

Page 28 stipulates that all building work will be carried out between the hours of 7 am and 5 pm, Monday to Saturday.

This must be required of the builder before approval is granted.

It is not enough to just levy penalties should noisy work be conducted outside of these hours, as the residents who are affected by the noise will receive no benefit of any penalties imposed on the builder.

Statistics for Traffic Modelling are Outdated

Many of the statistics that have been used in the proposal are outdated, often with newer figures readily available even during the time that the development report was being composed.

Page 31 uses statistics from 2007, which though maybe the most accurate available to the report producers at the time, are now quite inaccurate, omitting as they do the huge food retail outlet and redevelopment at Harbour Town and the major redevelopment that is currently underway at Castle Plaza. While these developments

do not appear on the 2007 register, they have been (or will be) completed before the Highway Inn redevelopment starts, thus their affect on retail statistics must be included in any justification that is based on a lack of retail space in the immediate area.

Retail analysis must be done again, with these new developments included as inputs, to confirm that retail benefits still exist that justify the development.

The traffic volume studies are also very outdated. Appendix C, section 2.7, refers to traffic data from 2004 being used. Section 2.8 refers to crash data from 2004 to 2006 being used. Modelling the impact on traffic flows (section 6.3.1) was done using the May 2004 data.

More recent traffic analysis data is available from DTEI. (believe that data for a given year is available midway through the following year, thus there is no reason why this report commissioned in 2007 could not have used data from 2006 at the very least.

In light of the change of traffic flows due to infrastructure changes that have taken place since 2004 (South Road underpass, tram overpass and tram service frequency, the installation of traffic lights on the Cross and Marion Road tram crossings), as well as increased car ownership and the further development of outlying suburbs that may have forced more private vehicles onto Marion Road, the traffic reports and analysis must be conducted using more recent data from DTEI before any approval is granted.

Traffic Modelling is Incomplete

Page 18, section 6.3.1, states that only the PM peak figures were used for the analysis of traffic impact on Marion Road and ANZAC Highway post development. This makes no sense in the context of Marion Road, when the AM peak will directly affect the traffic flow into and out of the development for retail access, as well as Elizabeth Avenue access for apartment residents, as the AM peak will result in traffic banking up immediately adjacent to the development.

Page 21, section 7.2, states that "Most deliveries would be in the morning, many before opening trading hours". If this is the case, the delivery vehicles will be attempting to exit onto Elizabeth Avenue, thence to Marion Road, during the AM peak that already sees Marion road with tailbacks as far as Bray Street and beyond. A 14 meter vehicle attempting to get onto Marion Road during the peak time will have difficulty, more so if it then needs to cross lanes and turn right to go city bound on ANZAC Highway.

Modelling for the AM peak must be conducted, using more recent data, before any approval is granted. Such modelling must include provision for 14 metre delivery vehicles negotiating Marion Road during these peak hours.

Delivery Vehicle Sizes and Elizabeth Avenue Egress

Page 21, section 7.2 refers to 14 metre articulated delivery vehicles servicing the site. It must be a condition of approval that this is the largest size of vehicle that can

service the site, as larger vehicles can be run on Marion Road and ANZAC Highway without the need for any formal approval.

Additionally, it must be a condition of approval that all delivery vehicles exit the site via Elizabeth Avenue, thence to Marion Road, to preserve the local traffic nature of Elizabeth Street. This could be enforced at council level ("No Right Turn" signs with occasional policing as required) as well as by design of the departure driveway to force traffic to turn left onto Elizabeth Avenue.

ANZAC Highway/Marion Road Intersection

The development diagram A002 (Appendix B) shows the Marion Road/ANZAC Highway intersection at the top right hand side of the diagram. It depicts the left-most lane of Marion Road as being a turn left only lane, blocked by a traffic island triangle, with the remaining two lanes going over ANZAC Highway.

Note that currently, the intersection has the three lanes of Marion road disposed of as turn left/straight ahead, straight ahead/turn right and turn right only.

Is this diagram accurate, or just a representation?

If it is accurate, modelling must be conducted to determine the impact on traffic flow of reducing the number of lanes available to traverse ANZAC Highway from two to one.

Additionally, will the turn left slipway onto ANZAC Highway from Marion Road be wide enough to accommodate 14 metre delivery vehicles that may wish to turn down ANZAC Highway after exiting the site via Elizabeth Avenue/Marion Road?

Parking Analysis does not Cover Local Neighbourhood Parking

The development report makes no mention of any increased parking activity on local streets, merely stating that it believes that the provided parking will be adequate, based on the analysis of current Hotel traffic conducted on two days (page 8, section 3, with associated figures)

The development at Marion, while on a completely different scale and a different type to the one proposed here, illustrates that insufficient parking provisions will result in vehicles being parked in adjacent neighbourhood streets during times of peak retail activity, be it the run up to Christmas or just a sunny afternoon.

Analysis of the impact on local parking must be conducted and presented, with approval dependent upon minimal impact on local parking being proven.

No Analysis if Provided on School Zone Impact

The report does not provide any analysis of traffic changes on the school zone on Elizabeth Avenue.

Analysis of Apartment Demand and Defined Usage is Lacking

The development plan does not appear to contain any analysis of the demand for the 120 apartments that are intended through to the end of stage two.

Page 1 of the report states that "providing high quality accommodation will make an important contribution to increased development density" which could imply that the development will be primarily residential in nature, yet the document generally refers to the apartments as being short to medium term serviced apartment accommodation. The traffic flow sections make assumptions based on stage one being serviced apartments but then mention extra provisions for parking if some of those apartments are designated residential.

Of note, I believe that issues have recently arisen at the Colley Towers development in Glenelg, whereby residents of the development have lodged complaints against the developer and operator as they permitted apartments that were supposedly designated as residential only to be leased out as serviced apartments.

To ensure that these issues do not arise, and to ensure that all numbers and statements in the development report are correctly aligned, a definitive statement needs to be issued before approval is granted, identifying apartments as residential, serviced accommodation or mixed use.

General Comments on Analysis of Statistics

Page 8 states that (of a survey of households in the immediate catchment area undertaken by QED) "some 20% of people in adjoining suburbs ... indicated that they currently never shop at the existing Neighbourhood Centre facilities", and that the "proposed development will meet these aspirations" (of the 20% who said that they never shopped locally).

Using this information, I can quite accurately state "80% of people in adjoining suburbs ... indicated that they shop at the existing Neighbourhood Centre facilities, whether it be exclusively at those facilities or only occasionally".

Mr Alistair Tutte's modelling of retail volumes on page 38, while accurate for the time it was constructed, does not take into account the major retail redevelopments in both food and non-food lines being currently undertaken at Castle Plaza and Jetty Road, as well as the recently completed additions to Harbourside. While small variations in inputs to models can be overlooked, the magnitude of these developments cannot be disregarded. Alistair Tutte must be re-engaged to recalculate his models with these developments in effect.

Other Comments

Page 38 makes comments about how the development will benefit residents. As some of these comments have been made without any justification, I feel that I can make the following comments and for my comments to be just as valid as the ones that have been made.

"Providing 322 full time job equivalents..." is based on the assumption of 100% occupancy of supermarket and retail tenancies. What if the retail tenancies are only 50% leased at any one time? What if the supermarket is leased to a low overheads supermarket that doesn't use the same staffing model as the "average" supermarket? And 322 full time job equivalents is almost three times the number of jobs that the developer claimed would result when it was announced in May 2007 (Holloway Media Release, 29th May 2007, cites 120 jobs).

Please explain the discrepancy between the May 2007 employment figure and the May 2009 figure

Project Naming

As a local resident, I must express my dismay at how the information about this project has been disseminated to the residents of the area adjacent the development.

The notice for the public meeting was published in July 2009 under the title "North Plympton Shopping Centre".

Australia Post defines "North Plympton" as commencing north of Mooringe Avenue, itself nearly 500 metres North of the Highway Inn site. The Highway Inn is located in "Plympton", which even has a different postcode to "North Plympton".

This error was compounded by the fact that the advertisement did not carry any address details regarding the development.

It could thus not be expected that anyone living in the immediate area would have been able to identify the development correctly from the advertisement.

Upon investigation, I discovered that the Minister provided the name "Plympton North" as the suburb when the development was first detailed in the Gazette, 24th May 2007, and then again when the enlarged development was detailed in the Gazette, 29th January, 2009.

I call upon the Minister to correct this error, by publication of correct suburb details in the Gazette, appropriate re-titling of the project, and re-publishing public consultation details.



Thankyou for the opportunity to provide input to the planning process.

I am happy for my submission to be published as part of the consultation process and look forward to answers to my concerns.

Sincerely Yours

Christian Legg

Our ref: SA Water 13/01911
Your ref: Knet 2013/03346/01

**SOUTH AUSTRALIAN
WATER CORPORATION**

20 June 2013

Mr Robert Kleeman
General Manager, Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

SA Water House
250 Victoria Square,
Adelaide South Australia 5000

GPO Box 1751
Adelaide SA 5001

Telephone +61 8 8204 1000

ABN 69 336 525 019

Via email: yasmine.alliu@sa.gov.au

Dear Mr Kleeman

**Re: Plympton Mixed Use Development Anzac Highway/Marion Road, Plympton –
Amendment to the Development Report (Knet: 2013/03346/01)**

Thank you for your letter dated 27 May 2013, seeking comments on the above amendment to the Development Report. I apologise for the delay in responding.

While SA Water has no specific comments on the proposed amendment, in general, the following comments apply to new developments and redevelopments:

SA Water Planning

- SA Water undertakes water security and infrastructure planning that considers the longer term strategic direction for a system. The planning seeks to develop a framework that ensures resources and infrastructure is managed efficiently and has the capacity to meet customer requirements into the future. The information contained in the DPA regarding future re-zoning and land development will be incorporated in SA Water's planning process.

Provision of Water Supply

- Any development, including landscaping, shall be designed to incorporate water conservation principles and devices
- Development shall only be permitted to occur where the water supply system can adequately meet quality, quantity, sustainability and reliability standards, as appropriate for the particular type of development
- The use of rainwater tanks is encouraged. Tank sizes shall be based on water demand, local rainfall, contributing roof area and the level of reliability sought.
- The use of recycled water is recommended where appropriate

Protection of Groundwater

- Development/s shall have no deleterious effects on the quality or quantity of groundwater, or the natural environments that rely on this water. In particular, the following conditions shall apply:
 - Landfill shall be outside of Water Protection Zones;
 - Landfill area to include leachate collection facilities;
 - Effluent disposal systems (including leach drains) to be designed and located to prevent contamination of groundwater; and
 - Industry to be located in appropriate areas, with safeguards to ensure wastewater can be satisfactorily treated or removed from the site
- Development should not cause over-extraction of groundwater sources.
- The *Natural Resources Management Act 2004* includes wide ranging powers over groundwater quantity issues. The Department of Environment, Water and Natural Resources should be consulted if in doubt over compliance with this Act. Ground water quality issues are addressed by the Environment Protection Authority through the *Environment Protection Act 1993*.

Protection of Surface Water

- Development/s shall have no deleterious effects on the quality or quantity of surface water or the natural environments that rely on this water.
- Development shall not dam, interfere or obstruct a watercourse.
- Development shall avoid or minimise erosion.
- The *Natural Resources Management Act 2004* includes wide ranging powers over surface water quantity issues. The Department of Environment, Water and Natural Resources should be consulted if in doubt over compliance with this Act. Surface water quality issues are addressed by the Environment Protection Authority through the *Environment Protection Act 1993*.

Provision of Infrastructure

- All extensions to water/wastewater networks will be assessed on their individual commercial merits. Where more than one development is involved, one option will be for SA Water to establish an augmentation charge for that area, to equitably share the costs amongst those requiring and/or benefiting from the provision of the additional infrastructure. Any proposed augmentation charge will be assessed on its individual commercial merits
- If the existing water/wastewater infrastructure requires an extension or new approach mains to serve any proposed development, the developer/s will be required to meet the costs associated with these works.
- When a proposed development adversely impacts upon the capacity of existing water/wastewater infrastructure, the developer will be required to meet the cost of upgrading or augmenting the infrastructure to service the proposed water demands and/or wastewater discharges.
- The developer is also required to meet the costs of providing all water supply mains within the development site itself, including all water and wastewater pumping stations, pumping mains and water tanks.

- All new water supply mains constructed to serve commercial / industrial areas shall be a minimum size of 150 mm diameter. This is to provide an adequate water supply for industry as well as for fire protection purposes.
- Similarly all new wastewater collection pipes required to serve commercial / industrial areas shall be a minimum size of 225 mm diameter, and all property connections shall be a minimum size of 150 mm diameter. Where areas are being served by existing 150 mm diameter sewers, restrictions may be imposed on the types of development permitted in view of the smaller size mains.
- To facilitate orderly development and to minimise the costs of new infrastructure and services, new development/s (including rezoning of existing areas for development), should wherever possible adjoin (or be nearby) to existing infrastructure.
- Construction of water supply, wastewater and recycled water infrastructure will need to comply with SA Water Infrastructure Standards.
- In general, SA Water does not provide water supply to Rural Living or Country Living allotments, however, where capacity is available or if a developer is prepared to pay the full costs of augmenting the system, a supply may be granted. In addition, SA Water may also limit the flow to these services to 5 L/min.

Trade Waste Discharge Agreements

Any proposed industrial or commercial developments will be subject to an SA Water Trade Waste agreement, to permit the discharge of trade waste to the sewer network. Industrial and large dischargers may be liable for quality and quantity loading charges.

I thank you for bringing this matter to my attention and trust this information is of assistance.

Yours sincerely



John Ringham
CHIEF EXECUTIVE

If calling please ask for:
David Kubler

Telephone: 8204 3611
Fax: 8204 3781
Email: communitysafety@samfs.sa.gov.au

Reference:

/

19/06/2013

Mr Robert Kleeman
General Manager, Assessment
Department of Planning, Transport and Infrastructure
5th Floor – 136 North Terrace
Adelaide SA 5000

Dear Robert

South Australian Metropolitan Fire Services - Comment

Premises: Plympton Mixed Use Development, Cnr Marion and Anzac Hwy

We have reviewed the amended Development Report and advise that the SAMFS generally supports this development.

We note that the SAMFS presently has the resources to respond to this development and it will be assessed under the SAMFS "Predetermined risk response and greater alarm system" operational procedures.

This development will be serviced by primary response stations of St Mary's (STN 40) and Camden Park (STN 41), with back-up and aerial support appliances available from Adelaide Station (STN 20).

It is considered that, as per previous comments provided by our department (Refer Attachment 3 – Connor Holmes), that the development will comply with the Building Code of Australia and that this Department will be consulted and involved with the design, approval and commissioning phases as required under the Development Regulations 2008.

For clarification of this correspondence or further advice on fire safety, please contact the undersigned Fire Safety Officer on telephone 8204 3611.

Yours faithfully,



David Kubler
BE (MN) GDip (FireSafety)

Fire Safety Engineer
COMMUNITY SAFETY & RESILIENCE DEPARTMENT
South Australian Metropolitan Fire Service



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Adelaide SA 5000

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**Government
of South Australia**

Ref: DCSI/13/06323-1

Urban Renewal Authority
trading as Renewal SA
Level 9 (West) Riverside Centre
North Terrace, Adelaide SA 5000
GPO Box 698, Adelaide SA 5001
DX: 56502 ABN: 86 832 349 553

T 08 8207 1300
F 08 8207 1301
E renewalsa.info@sa.gov.au
W www.renewalsa.sa.gov.au

Mr Robert Kleeman
General Manager, Assessment
Planning Division
Department for Planning, Transport and Infrastructure

Dear Mr Kleeman

<i>Major Development Proposal:</i>	PLYMPTON MIXED USE DEVELOPMENT ANZAC HIGHWAY/MARION ROAD PLYMPTON <i>Your ref Knet: 2013/03346/01</i>
<i>Document referred:</i>	AMENDMENT TO THE DEVELOPMENT REPORT
<i>Comments due:</i>	5.00 pm, 19 June 2013

Thank you for referring this amended proposal.

Renewal SA notes that the proponent intends that 40 of the residential apartments to be developed on the site will be for affordable housing and that these apartments will meet the Government's policy definition for affordable housing.

The criteria for affordable housing are set out in the attached Notice issued under Regulation 4 of the *South Australian Housing Trust Regulations 2010*. The criteria require that a legally binding agreement between the developer/owner and a Minister or Council be in place securing the affordable housing commitment; otherwise the development proposal should be considered on the basis that it does *not* include affordable housing.

Renewal SA considers that inclusion of affordable housing is a significant component of the proposal and, regardless of whether it is intended to deliver the affordable

apartments as affordable rental or home ownership opportunities, that commitment should be confirmed by the proponent entering into a Land Management Agreement under s57 of the *Development Act 1993* with the Minister for Housing and Urban Development.

The proponent is therefore invited to contact Robyn Evans, Senior Project Manager, Renewal SA on 82070625 to progress that agreement.

1

Yours sincerely



Debra Just
General Manager, Urban and Portfolio Planning
Renewal SA

/06/2013

NOTICE UNDER REGULATION 4

*Determination of Criteria for the Purposes of the Concept of Affordable Housing*1. *Application*

This notice applies to:

- (a) applications for development authorisation under the Development Act 1993 (SA); and
- (b) policies under Development Plans pursuant to the Development Act 1993 (SA).

2. *Determination of Criteria*

- (1) A dwelling that is the subject of an application or policy to which this notice applies ('Dwelling') will fall within the concept of affordable housing for the purposes of the South Australian Housing Trust Regulations 2010 (SA) if:
- (a) the Dwelling is to be offered for sale to an Eligible Buyer at or below the price described in row two in the table set out below (having regard to the location of the Dwelling as described in column two and three of that table) ('Price') (or at the Price as varied under the terms of the legally binding agreement referred to in paragraph 2 (1) (c) or 2 (3)); and
 - (b) in the case of an application for a development authorisation—a legally binding agreement between the developer/owner and a Minister, or instrumentality of the Crown in right of the State or Council (constituted under the Local Government Act 1999 (SA)), is in place to ensure that the sale of the Dwelling complies with the requirements set out in this Notice; or
 - (c) the Minister responsible for administering the South Australian Housing Trust Regulations 2010 (SA) otherwise determines, in the Minister's absolute discretion, that the Dwelling constitutes affordable housing for the purposes of the South Australian Housing Trust Regulations 2010 (SA).

Affordability Indicators (June 2012)	Greater Adelaide and Regional Cities*	Rest of State*
House and land purchase price (inclusive of GST)	\$288 000	\$244 000

* 'Greater Adelaide' means Metropolitan Adelaide as defined in the Development Act 1993 (SA). Regional Centres are Roxby Downs, Mount Gambier, Murray Bridge, Port Augusta, Port Pirie, Whyalla and Port Lincoln.

'Rest of State' means all areas in the State of South Australia excluding Greater Adelaide and the Regional Cities described above.

(2) An Eligible Buyer is:

- (a) a person who is assessed as being eligible by Renewal SA;
- (b) the South Australian Housing Trust or a registered housing association or a registered housing co-operative under the South Australian Co-operative and Community Housing Act 1991 (SA);
- (c) a person (natural or corporate) approved to provide affordable rental under the 'National Rental Affordability Scheme';
- (d) a person (natural or corporate) subject to an affordable housing facilitation agreement with a Minister, or instrumentality of the Crown in right of the State; or
- (e) any class of persons, declared from time to time by the Minister responsible for administering the South Australian Housing Trust Regulations 2010 (SA).

(3) If the Dwelling:

- (a) has features which make it more energy efficient and environmentally sustainable; or
- (b) is on a small allotment within close proximity of public transport; or
- (c) is offered for sale in conjunction with a financing product that increases an Eligible Buyers purchasing capacity, or

- (d) provides for dual occupancy living as outlined in the 'Meeting the 15% Requirement for Affordable Housing' assessment guidelines published from time to time by Renewal SA, the developer/owner may seek approval from the Minister with applications for approval directed to the Director Strategy and Affordable Housing for a variation of the Price by up to 15%.
- (4) A developer/owner may sell a Dwelling for more than the Price if:
 - (a) the Dwelling is purchased by those classes of Eligible Buyer described in paragraphs 2 (2) (b), 2 (2) (c), or 2 (2) (d); and
 - (b) the Eligible Buyer agrees to that higher price.

Dated 30 January 2013.

TONY PICCOLO, Minister for Social Housing

EPA 05 07002

Robert Kleeman
General Manager, Assessment
Statutory Planning
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Dear Mr Kleeman

Plympton Mixed Use Development Anzac Highway/Marion Road Plympton

Thank you for the opportunity to comment on the Amendment to the Development Report for the Plympton Mixed Use Development Anzac Highway/Marion Road Plympton.

This response is a combined one from the Department of Environment, Water and Natural Resources (DEWNR), Environment Protection Authority (EPA), and Zero Waste SA.

Comments are contained in the attached appendices.

For further information on this matter, please contact Geoff Bradford on 8204 9821 or geoffrey.bradford@epa.sa.gov.au.

Yours sincerely



Kym Pluck

TEAM LEADER, PLANNING POLICY AND PROJECTS
SCIENCE & ASSESSMENT DIVISION
ENVIRONMENT PROTECTION AUTHORITY

Date: 20 June 2013

APPENDIX 1 – DEPARTMENT OF ENVIRONMENT, WATER AND NATURAL RESOURCES

Guideline 4.4.8 requires that the proponent 'provide details of all landscaping (including surface treatments, street furniture and lighting), including the contribution of the landscaping to the Urban Forest program and Water Sensitive Urban Design (WSUD)'.

This guideline has not been adequately addressed in the Development Report. Whilst the Development Report indicates that the proposal would include landscaping, green walls and a green roof, no details (other than hard and soft (vegetative) treatments, planter boxes and exotic Platanus and Pyrus shade trees and architectural plants such as Agave, Cycad, Viburnum and Yucca) or plans are provided.

Rather, the Development Report defers the details (and presumably plans) to the detailed design. It is difficult for DEWNR to assess the merits of the proposed landscaping and its contribution (or otherwise) to the Urban Forest program and WSUD, not to mention Green Infrastructure, in the absence of such details.

APPENDIX 2 – ENVIRONMENT PROTECTION AUTHORITY COMMENTS

On 13 August 2009 the EPA contributed to a response to the Development Report. The EPA identified a number of environmental issues that it did not believe were adequately addressed. Having reviewed the Amendment to the Development Report, the EPA believes that many of those issues identified in 2009, and consequently the requirements of the Guidelines, have not been addressed. Further comment is provided below.

Water Quality

It is stated on page 44 in section '3.4.4 Stormwater, water and WSUD' that 'The initial stormwater flows may be taken out the street kerb and water table. It is estimated that four will be allowed, with two fronting Anzac Highway and two fronting Marion Road'. As was identified by the EPA in the response of 13 August 2009, it is still unclear as to how the stormwater will be managed. Later in this section on page 45 there is a mention of swales, gross pollutant traps, and oil and plate separators with the third dot point on page 45 also mentioning 'first flush'. It is very unclear as to how the 'first flush' will be managed and where the swales, gross pollutant traps, and oil and plate separators will be installed. The statement quoted above suggests that stormwater will simply be diverted to kerb side and be combined with the existing stormwater system.

As identified in the letter of 13 August 2009, section 3.4.11 'Dust control and sediment management' on page 48 inappropriately refers to section 3.4.4 for stormwater management. Section 3.4.4 relates to how stormwater will be managed post-construction and does not include information on how stormwater will be managed during the construction phase. How stormwater will be managed during construction needs to be explained in more detail.

The section 'Stormwater runoff' on page 49 states 'Stormwater runoff will be captured and filtered for storage and reuse. Excess water will be discharged into the existing stormwater system if not required for reuse'. A statement should be added here about the measures that will be put in place to ensure that any stormwater discharging from the site will occur in accordance with the *Environment Protection (Water Quality) Policy 2003* and explain how sediment runoff from the site will be minimised. The Construction Environment Management Plan should take into consideration how sediment transport from vehicular traffic, and wind and rain will be minimised and a discussion of how sediment stockpiles will be managed should also be included.

A basement car park is proposed as part of the development, however, there has been no discussion about groundwater levels at the site and if dewatering (an activity that may require an EPA licence) will be required during the construction phase. The groundwater quality will also need to be tested to determine what contamination may exist at the site.

Air Quality

In its advice of 13 August 2009, the EPA provided comment in respect of the need to demonstrate compliance with the *National environment protection (ambient air quality) measure* (1998) and with the *National environment protection (air toxics) measure* (2011). Those comments are still applicable.

The following further advice builds on that provided on 13 August 2009.

Potential Issues

Traffic related emissions are the most significant contributors to air quality impacts in urban environments. Data suggests that vehicle emissions of oxides of nitrogen, carbon monoxide and fine

particles in the urban environment (such as the Adelaide CBD) account for around 80% of the totals. Consequently, traffic emissions require the greatest consideration in planning for clean air, particularly since the 30-Year Plan forecasts substantial increases to Adelaide's population, which may result in a significant increase in traffic.

Given the significance of the potential traffic the EPA suggests that air quality modelling based on the forecast traffic changes could be undertaken and this information would inform the redesign of the urban landscape, with the principles of clean air made imperative to the planning process.

Demolition and construction phase dust management needs effective planning. Elements such as consideration of meteorological conditions (forecast and active), actual dust creation and dust movement assessment (with an effective system for cessation of work and the instigation of mitigation measures) are essential in an effective dust management plan.

Interface issues between commercial and residential premises need sensitive management. For example, food establishments and coffee roasters can cause odour impacts to nearby residents. While, on paper, these may appear as minor issues, they have a way of becoming significant in time spent to try and resolve them. Consequently, they should be considered as part of the planning process.

Combustion sources can also cause local concern where, say, wood heaters may not have as significant an effect at ground level compared to elevated levels as the plumes rise possibly impacting high-rise premises.

The principles of good design should be considered in any residential housing and mixed use developments.

Solutions to minimise impacts

When determining the means of protecting residents of housing from air emissions impacts arising from transport corridors in particular, three broad approaches (or a combination of all three) may be considered:

- Engineering solutions (e.g. barriers, mounds).
- Design of the development (e.g. use of open space as buffers, landscaping, consideration of the meteorology such as cold air drainage).
- Architectural elements (e.g. building orientation, levels of isolation).

Combination of these types of approaches may in some cases provide partial solutions for air concerns (for example open space buffer zones, building orientation and design). That is not so in all cases. For example, there is increasing knowledge that vehicle exhaust pollution can travel considerable distances from roadways (particularly fine particles). However, as air pollution constitutes community risks from similar sources, solutions should at least be compatible. In some instances, careful design of developments may serve to mitigate impacts.

Minimising the impact of transport-generated air emissions can be challenging when housing is proposed in high-density in-fill development. Such residential development is likely to be in multi-storey buildings with commercial uses on the ground level and dwellings above. The need to maximise the use of space can make it difficult to establish buffers for outdoor areas to locate housing away from transport corridors.

Although it is possible to reduce air quality impacts in many situations through design, architectural elements, and engineering solutions, some land uses are incompatible and should not be located near each other.

Engineering controls

- Air conditioning intakes on buildings should be located as far as is practicable from transport corridors.
- Air conditioning systems should include filtration to remove fine particles where ambient air quality is very poor (this is reliant on sealed positive pressure apartments in which access to unfiltered ambient air is not recommended).
- Car park ventilation should be directed away from open spaces and higher amenity areas, towards major roadways.

Design of the development

- Open spaces containing trees and other vegetation should be established between housing and transport corridors to increase natural air filtering processes.
- Trees should be planted along major roadways to increase natural air filtering processes.
- Outdoor ground level community recreation and leisure areas should be created to provide residents of housing with a place of amenity.
- Non-residential buildings should be placed between transport corridors and residential dwellings to attenuate air emissions.

Architectural design

- Residential dwellings should be orientated so that balconies open onto parks and open spaces and not transport corridors.

Noise

In its 13 August 2009 response to the Development Report the EPA identified potential issues and provided information on recommended noise levels.

The EPA reiterates the comments made in that response and that they are still relevant, but advises that since that advice there have been some changes to the addressing of noise within the planning system.

The EPA recommends that the Development Report incorporates the requirements of the *Ministers Specification SA 78B Construction requirements for the control of external sound* (February 2013).

Site Contamination

The EPA has undertaken a review of the site contamination information provided in the Amendment to the Development Report for the Plympton Mixed Use Development. The EPA is concerned that the timeframe since submission of information provided in the original Development Report exceeds three years. The EPA considers that, because a potentially contaminating land use may have occurred since 2009, there is a potential for site contamination to exist on land; therefore, it is essential for the proponent to demonstrate that the site is suitable for the proposed use.

The information provided in the Amendment to the Development Report is therefore insufficient for the EPA to support the Amendment to the Development Report. The EPA recommends the following additional assessment be undertaken prior to land development.

- Provide a site history report that identifies any activities or potential for site contamination to have occurred from 2009 to present. The EPA advises that the site history report should:
 - be prepared by a site contamination consultant in accordance with Schedules A and B of the *National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPM)*; and
 - document the preliminary investigations at the site carried out in accordance with the NEPM; and
 - determine whether a potentially contaminating land use as described in Appendix 1 of Planning Advisory Notice 20 (PAN 20) has occurred with the potential to cause site contamination affecting the site; and
 - provide statements in relation to the existence of site contamination at the site. Statements by site contamination consultants in relation to site contamination must be clearly qualified as to the existence of site contamination at the site by specifying the land uses that were taken into account in forming that opinion as required by Section 103ZA of the *Environment Protection Act 1993*.

APPENDIX 3 - ZERO WASTE SOUTH AUSTRALIA COMMENTS

Section 3.4.5 'waste management' provides information on the waste service anticipated for commercial and residential collections. Integrating high quality design outcomes to accommodate sufficient space to allow for waste and recycling can be challenging for higher density developments like this proposal. Integrating waste management into the design needs to be fully considered early in the development planning stage.

The domestic three bin kerbside system predominantly used in metropolitan Adelaide is suited to a low density urban environment and achieves good levels of recycling. Recovery levels from higher density developments are often significantly less due to different infrastructure requirements, lower participation and higher levels of contamination. To achieve state recycling targets it is important sufficient space for access and egress of collection vehicles and suitable infrastructure for the storage and movement of waste and recycling by occupants is provided.

Zero Waste SA, in partnership with the Property Council and Renewal SA, is in the process of developing better practice guidance for medium density, high density and mixed use developments. The guide will be for use by developers and industry professionals and local government planning and development, engineering and waste management staff.

The proposed guidance aims to provide a framework to achieve safe, cost effective and convenient waste and recycling for residents and access for collection vehicles by providing guidance on:

- safe and convenient waste and recycling for residents
- safe and convenient access for collection vehicles
- ensuring recycling is as an integral part of all new developments
- encouraging high quality design outcomes for residential and mixed use developments through advice on:
 - internal design (waste management systems, for example chutes or compactors)
 - collection areas (ease of access to bins by residents, enclosure sizes, visual amenity)
 - bin presentation areas (visual amenity, access and egress for collection vehicles)
 - waste collection (noise and sensitive adjacent users)
 - waste management plans.

In reply please quote 2013/00169/01, Process ID: 214238
Enquiries to Marc Hryciuk
Telephone (08) 8343 2301
Facsimile (08) 8343 2725
E-mail dpti.luc@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure

**TRANSPORT SERVICES
DIVISION**

77 Grenfell Street
Adelaide SA 5001

GPO Box 1533
Adelaide SA 5001

Telephone: 61 8 8343 2222
Facsimile: 61 8 8343 2585

18/06/2013

Mr Robert Kleeman
General Manager Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide SA 5001

Dear Mr Kleeman,

MAJOR DEVELOPMENT RESPONSE

Location	Allotments 86-96 in FP 8107, Allotment 10 in DP 71863 and Units 1 - 4 in Strata Plan 42, cnr Anzac Highway and Marion Road, Plympton
Proposal	Major Development Proposal - Plympton Mixed Use Development.

I refer to the above proposal forwarded to the Transport Services Division of the Department of Planning, Transport and Infrastructure (DPTI) in accordance with Section 46 of the *Development Act 1993*. The following response is provided in accordance with Section 46D(5)(a)(iii) of the *Development Act 1993*.

THE PROPOSAL

The subject proposal is an amended version of the Major Development that was previously lodged in 2009 for assessment. The current version of the development includes the following changes:

- Slightly reduced floor space for the retail and commercial components whilst retaining ability to provide a full line supermarket, and thereby reducing overall car parking demand and traffic generation.
- Reconfigured access and parking arrangements on the site to improve legibility for motorists and pedestrians and improve the functionality of the site.
- Reconfigured the residential components to provide for 108 apartments including dedicated affordable and serviced apartments. Two freestanding groups will be 4 levels with one group over retail to 7 levels.

CONSIDERATION

TRAFFIC MODELLING AND ANALYSIS

As part of the previous development DPTI raised some concerns relating to the SIDRA analysis undertaken for the development and recommended that micro simulation be undertaken to fully analyse the potential impact of the development on

the adjacent road network. DPTI has been provided a copy of the SIDRA and AIMSUN analyses and it is considered that the AIMSUN model provides a satisfactory basis for resolving the traffic issues associated with the development.

The AIMSUN Traffic Modelling Report identifies relatively minor improvement needs to the surrounding arterial road network to accommodate the additional traffic generated by the development during the PM peak, being:

- Provision of a separate right turn phase at the Marion Road / Anzac Highway intersection for the eastern approach;
- Extension of the Anzac Highway west approach right turn lane by 20m;
- Increase in phase times for the right turn movement from Anzac Highway into Cross Road.

The suggestion within the Response Report that providing these interventions is contrary to TOD / Corridor aims is not supported, as these improvements are directly attributable to the traffic generated by the proposed development (which takes into account TOD principles). Subsequently, the abovementioned works will need to be undertaken as part of the subject development.

ACCESS AND ROAD ISSUES

The AIMSUN model shows that it is proposed to retain the current configuration of the Marion Road / Elizabeth Avenue junction and close the median at the Marion Road / Mabel Street junction. The model also shows the two-way car park access on Anzac Highway being left-in / out only even though this access has been relocated from its existing position to line up with the existing u-turn facility on Anzac Highway, thus resulting in all movements being possible at this location. In the interest of road safety, DPTI considers that:

- Vehicle movements to and from Marion Road at Elizabeth Avenue and Mabel Street be restricted to left turn in and left turn out only to Marion Road by closing the median openings;
- Vehicle movements at the two-way car park access point on Anzac Highway be restricted to left turn in, left turn out and right turn in only. Right turn out movements must not be permitted to occur in any form. To accommodate right-in movements, the U-turn facility should be modified to prohibit U-turns from the northeast. If the design cannot entirely prohibit the above movements, the U-turn on Anzac Highway will need to be closed entirely.

As these modifications are as a direct result of the proposed development, they must be funded by the proponent.

The proposed bus bay on Anzac Highway is supported in principle. However, as a result of the proposed additional entry point into the development on Anzac Highway, the bus bay should be relocated to be immediately downstream of the new entry point (and moving the taxi rank further to the southwest, but not immediately adjacent to the other access point).

The bus bay on Anzac Highway and the deceleration lane on Marion Road will be required to be designed to DPTI's satisfaction. Existing footpath widths around these facilities will need to be retained, and land will be required to be vested as road reserve to accommodate the footpaths. With particular respect to the left turn lane on Marion Road, modifications to the design of the development adjacent the left turn

lane may be required to ensure that the left turn lane meets Austroads requirements whilst retaining existing footpath widths at this location.

In relation to the proposed entry point on Anzac Highway, it appears that the entry angle will potentially result in vehicles entering the site at a higher than desirable speed. This has the potential to impact on pedestrian safety at this location. Consideration should be given to how this issue can be managed as part of the detailed design of this entry point.

With respect to the Marion Road access DPTI recommends that the zebra crossing (shown in plan A002 dated 17.01.2013 revision J) and the car parking between the access and the first intersecting car park aisle be removed in order to provide an unimpeded flow into the site, thus minimising the potential for vehicles to be required to queue back onto Marion Road. Similarly, the three car parking spaces adjacent the two-way car park access on Anzac Highway should be deleted in order to minimize the potential for interference with the traffic flow through the site at this location.

In relation to service vehicles, it is considered that the access points to/from the development should accommodate a 19m General Access Vehicle. It is not expected that this will result in any significant impact on the proposed layout. However, this will ensure that the largest General Access Vehicle legally permitted to access the site can do so without any difficulty should such a vehicle be required to access the site.

ROAD WIDENING REQUIREMENTS

The Metropolitan Adelaide Road Widening Plan shows that a strip of land up to 4.5 metres in width may be required from the Anzac Highway and Marion Road frontages of the site, together with additional land from the Anzac Highway/Marion Road corner for the possible future upgrading of the Anzac Highway/Marion Road intersection. An additional 4.5 metres x 4.5 metres cut-off is required from the Marion Road/Elizabeth Avenue corner of the site. The consent of the Commissioner of Highways is required under the Metropolitan Adelaide Road Widening Plan Act for all new building works located on or within 6.0 metres of the above requirements.

It should be noted that DPTI is considering a potential future upgrade of the Anzac Highway/Marion Road intersection, Marion Road/Cross Road intersection, and the midblock section between the intersections. There is currently no funding committed to this potential upgrading. Preliminary investigations indicate that it is unlikely that land would be required from this development site.

PROVISION OF ADVERTISING SIGNS

It is noted that limited detail is provided on the type of advertising signs to be located adjacent the arterial road network. It is important that any signs associated with this development do not interfere with existing traffic control devices or result in distraction or confusion of motorists. Subsequently, any signs must be simple, effective and easily assimilated. Under no circumstances should signs be allowed to flash, scroll or move as this will result in undesirable distraction to motorists. Should additional signage be required, above and beyond the proposed pylon sign on Anzac Highway, these must be assessed to ensure that they will not impact on road safety, particularly given the complexity and nature of movements at this location.

CYCLING AND WALKING

As well as higher than usual densities and mixed land use design, characteristics of transit-supportive environments include the importance of high-quality walking

environments through pedestrian-friendly designs. The site is located within a short walking distance to the tram, however, there are no obvious direct linkages or design references from the site to the tram stop for pedestrians or cyclists. The proposal would benefit from maximising physical connections between retail, residential and public transport, with more consideration being given to the walkability of the site as a whole. It is also noted that the footpath along the Marion Road frontage adjacent the car park ramp and access appear to be constrained and that the proposed bike racks and vegetation may interfere with pedestrian movements. It is accordingly recommended that footpath widths be maximised (and as a minimum be no narrower than the existing footpaths) and that the attractiveness and safety of pedestrian facilities at this location be enhanced (and along Anzac Highway) in order to make the environment encouraging to pedestrians. Additionally, it is understood that directional and way finding signage will be provided as part of the overall development to indicate the short walking distance/time to the tram stop and bus stops. This outcome is supported by DPTI as it will enhance the links between the development and its surrounding environment (including public transport facilities).

As previously detailed, current experience shows that pedestrians generally do not cross Marion Road at the pedestrian crossings to access the bus stops on the eastern side of the road. Rather, they cross uncontrolled and store in the existing median at this location. Given that the development will result in an increase in pedestrians at this location, it is likely that this activity will increase. It is also noted that the interaction between the proposed development and the existing shopping complex to the north has not been considered, particularly from a pedestrian perspective. It is likely that the proposed development would result in an increase in pedestrian movements between the northern and southern side of Anzac Highway, particularly adjacent the bus stop. The impacts of the development on pedestrian movements should be considered as part of the assessment of this development to ensure that pedestrian safety is maximised.

With respect to the provision of secure bicycle parking and end of trip facilities it is noted that these are provided and that visitor bicycle parking rails are well positioned for passive surveillance. These bicycle parking facilities, should be designed in accordance with Australian Standard 2890.3-1993 and the AUSTROADS, Guide to Traffic Engineering Practice Part 14 - Bicycles.

CONCLUSION

In general, the proposed development is supported subject to conditions that ensure all of the transport requirements and impacts associated with the development are appropriately managed.

ADVICE

The planning authority is advised to attach the following conditions to any approval:

1. Vehicle movements to and from Marion Road at Elizabeth Avenue and Mabel Street be restricted to left turn in and left turn out only by closing the median openings on Marion Road. As part of this work, the right turn lane on Marion Road for vehicles turning right into Anzac Highway to head east shall be extended to maximize storage at this location.
2. Vehicle movements at the two-way access point to the car park on Anzac Highway shall:
 - i. be restricted to left turn in, left turn out and right turn in only. Right turn out movements shall not be permitted to occur in any form. To

- accommodate right-in movements, the U-turn facility shall be modified to prohibit U-turns from the northeast; or
- ii. in the event that the design cannot entirely prohibit the above movements, the U-turn on Anzac Highway shall be closed entirely and access restricted to left turn in and left turn out only.
3. A left turn deceleration lane shall be provided at the Marion Road access to the car park. This shall be designed in accordance with the Austroads Guide to Road Design Part 4A and DPTI standards.
 4. The indented bus stop and taxi rank adjacent the Anzac Highway frontage of the site shall be relocated and or modified to the satisfaction of DPTI.
 5. A separate right turn phase shall be provided at the Marion Road / Anzac Highway intersection for the eastern approach. Additionally, the phase times for the right turn movement from Anzac Highway into Cross Road shall be increased. These modifications shall be to the satisfaction of DPTI at the cost of the developer. This shall be undertaken prior to occupation of the development.
 6. The right turn lane on Anzac Highway western approach shall be extended by a minimum of 20m.
 7. The entry only into the car park from Anzac Highway shall be designed to maximize pedestrian safety.
 8. Sufficient land shall be set aside along the Marion Road and Anzac Highway property frontages to accommodate the required road works and to provide DDA compliant footpaths (any new or relocated footpath must be no narrower than the existing footpaths). All land required from the site to facilitate this requirement shall be vested to road at no cost to Council or DPTI.
 9. All redundant crossovers shall be removed and be replaced with kerb and gutter to Council standards, with all costs being borne by the applicant.
 10. All road works and improvements required to accommodate the proposed development shall be designed and constructed to the satisfaction of DPTI, with all costs (design, construction and project management) being borne by the developer. With regards to the design, the developer is required to seek approval for the concept plan from DPTI's Metropolitan Region, Senior Access Management Engineer, Ms Catherine Magraith on telephone (08) 8226 8325, before undertaking any detailed design work. All road works and improvements shall be completed prior to occupation of the development.
 11. The loading docks and associated access points shall be designed to facilitate 19.0m semi trailers.
 12. The five car parking spaces on the southern side and the eight spaces on the northern side of the Marion Road access aisle shall be removed from the proposal to minimize conflict adjacent the Marion Road access point.
 13. The three car parking spaces immediately south of the two-way access point on Anzac Highway shall be removed from the proposal to minimize conflict adjacent the Anzac Highway access point.
 14. The on-site parking shall be designed in accordance with the Australian/New Zealand Standard 2890.1:2004 and 2890.6:2009. All facilities for commercial vehicles shall conform to Australian Standard 2890.2:2002.

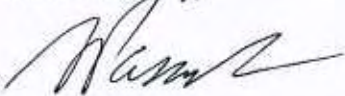
15. The car park shall be appropriately line marked and signed to ensure the desired flow of traffic through the site.
16. All bicycle parking facilities, shall be designed in accordance with Australian Standard 2890.3-1993 and the AUSTROADS, Guide to Traffic Engineering Practice Part 14 – Bicycles.
17. Appropriate way finding signage shall be installed to the satisfaction of the Minister of Planning.
18. The colours and illumination of signage associated with the site shall not create a glare or distraction to passing drivers and shall not interfere with the operation of adjacent traffic signals.
19. No element of LED or LCD display shall be included in the design of any signs visible from the adjacent road network.
20. Trailer mounted variable signs shall not be used on or adjacent the subject site for advertising purposes.
21. No stormwater shall be permitted to discharge on surface to Anzac Highway or Marion Road. Any modifications to stormwater infrastructure as a direct result of the development shall be at the expense of the developer.

The following notes provide important information for the benefit of the applicant and are required to be included in any approval:

- a. The Metropolitan Adelaide Road Widening Plan shows that a strip of land up to 4.5 metres in width may be required from the Anzac Highway and Marion Road frontages of the site, together with additional land from the Anzac Highway/Marion Road corner for the possible future upgrading of the Anzac Highway/Marion Road intersection. An additional 4.5 metres x 4.5 metres cut-off is required from the Marion Road/Elizabeth Street corner of the site. The consent of the Commissioner of Highways is required under the Metropolitan Adelaide Road Widening Plan Act for all new building works located on or within 6.0 metres of the above requirements.

The attached consent form should be completed and returned to DPTI with three copies of the final stamped approved plans.

Yours sincerely,



MANAGER, TRAFFIC AND ACCESS STANDARDS

for **COMMISSIONER OF HIGHWAYS**

25 June 2013

Minister for Planning
Attention: Robert Kleeman, General Manager,
Assessment Branch
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

Dear Sir/Madam

Plympton Mixed Use Development - ANZAC Highway/Marion Road

Thank you for providing the City of West Torrens with the opportunity to comment on the mixed use major development at the Highway Inn site in Plympton.

The following points summarise Council's major concerns with the proposal:

1. The *Minister's Guidelines* for this development detail the range of issues that has to be addressed by the applicant. The Development Report suggested that landscaping and streetscape to Elizabeth Avenue will be addressed in consultation with Council. This statement does not provide clear confirmation that the applicant will be responsible for the design and cost of these works and the proposal continues to portray extensive stretches of large blank walls adjoining the property boundary of Elizabeth Street. Way finding signs are proposed between the subject site and the nearest tram stop, however, details have not been provided on the signage, location and effectiveness in directing users between these two facilities. Because the Neighbourhood Centre is split by major arterial roads and the tram stop is located some distance away from the subject site, the *Minister's Guidelines* is quite clear on the need to analyse the pedestrian desire lines and provide measures that would provide safe and convenient pedestrian connections. This detailed pedestrian analysis has not been undertaken, including how pedestrians would access the development from Elizabeth Avenue, as there is no mall entrance from this street. This would also be applicable for the West Tower of the development.
2. The proposed development encroaches into the Residential Zone, but very little evidence has been provided as to the likely impacts of the proposal upon the amenity of the existing residents within the locality with the exception of over shadowing. Overlooking and increased traffic movements are likely to be a significant impact upon adjacent residents.
3. In relation to stormwater considerations, the DAC guidelines for this development site, as well as the West Torrens (City) Development Plan, have

many requirements in relation to water sensitive urban design (WSUD), stormwater detention, quality, retention and reuse. The Development Report provides little information on how these requirements will be met.

Whilst general information has been provided regarding stormwater, water and water sensitive urban design, it is suggested that as ultimately any stormwater run-off from the site will be entering the stormwater system, Council should request that the applicant enters into discussions with the City Assets Department to establish an effective and well integrated stormwater management system.

4. Due to the potential ramification of these measures on Council's infrastructure, Council requests that it be provided with the CEMP in order for it to assess the potential impacts prior to finalisation of the development design.
5. The traffic impact analysis of the development has been undertaken by the applicant in consultation with DPTI, through the use of (AIMSUM) network modelling. Council does not have the capacity to check this modelling work. It is assumed that the modelling work has been undertaken to the requirements of DPTI and the future impacts of the development appropriately determined. However, for Elizabeth Avenue, which is a Council road, there are no details provided of the modelling result at Marion Road, eg the potential queue lengths, the need for separate left and right turn lanes, the requirement to prohibit parking on both sides of the street etc. These details are required for Elizabeth Avenue.
6. The nominated service vehicle for the proposed supermarket is a 14m long semi-trailer. The standard general access articulated vehicle in AS 2890.2-2002, and in the road design standard, is a 19m semi-trailer. In many recent developments, the 19m semi-trailer is the standard vehicle nominated by supermarket operators. While in an approval, a 14m long semi-trailer could be specified as a condition, it would however require continual enforcement of this condition. This is not considered to be a practical approach, given that the proposed development is an entirely new development and the design to accommodate a 19m semi-trailer could be undertaken by adjusting the design layout. The proposed loading area should therefore be redesigned to accommodate the standard 19m semi-trailer.
7. Waste removal for "the apartments" is addressed in the consultants report but the proposed plans do not match this commentary for the East and West Towers in particular, with no waste removal provisions being made for these building and waste removal inadequately addressed for all other areas of the development.
8. The parking generation of the Highway Hotel is based on previous surveys undertaken in 2007. During the peak shopping times, the "overlapping" hotel parking demand was estimated at 160 spaces. There is no updated parking data provided for the hotel. Over the 6-year period since the last parking

survey, trading conditions may have changed significantly. This could have significant implication on the parking adequacy assessment, given that Aurecon's conclusion of adequate parking is based on this 160 number. It is unusual for a development of this scale to rely on such old parking data for assessing parking adequacy. A further parking survey should be undertaken to verify the accuracy of the hotel parking data.

9. The Hotel has been trading on the subject site for many years and has enjoyed proximity to the range of public transport available, such as buses and trams. In the parking surveys undertaken for the Hotel, the parking demand found would have already taken into account the "discounting" for the use being close to these public transport services. Shared parking between the hotel and the new shopping centre has been taken into account, by using the actual parking demand of the hotel during the peak shopping time, ie 160 spaces, instead of the peak Friday night hotel demand of 230 spaces. Further discounting of the hotel parking in this regard by Aurecon, seems not to be justified.

The following elaborates upon these points:

Waste Removal:

The Development Report states the following:

Waste removal for the apartments is proposed to be handled via a third party collection. It is intended that residential waste will be stored in multi coloured four wheel 660 litre garbage bins located at ground level with access for removal by a contractor. It is anticipated that 10 (coloured) bins will be provided for general waste and 2 (coloured) bins for recyclable materials. These will be moved to the general ground floor loading area, using the goods lift, for commercial removal on a weekly basis.

The North Tower plans show rubbish chutes on each floor and a utility room at the car park level, it appears that rubbish bin/s will be kept in this area. Whilst a bin storage area is apparent for the ground floor of the West Tower, waste removal provisions are not readily apparent for any other area of the development (including commercial and retail) and servicing arrangements have not been detailed.

Parking Assessment:

The commonly adopted parking rate for retail land uses is 5.5 spaces per 100m². It would be reasonable to discount the parking requirement to take into account a development designed as a mixed use (shared parking opportunity) and with transit oriented development principles (proximity to a range of public transport alternatives). However, there is no substantiated data to identify what this discount factor should be.

In the previous 2009 report for the development, the parking rates adopted by the Proponent were 4.2 spaces per 100m² for the supermarket and 4.5 spaces per 100m² for specialty shops. These rates were based on the NSW RTA guidelines and reflected the location of the development close to public transport services. They approximately equate to a reduction of 20% from the starting rate of 5.5.

The current development has adopted parking rates sourced from the SA Planning Policy Library Version 6. The Policy Library recommends parking rates that are much lower than those commonly adopted and even lower than the NSW RTA rates. However, it is not clear on what basis the lower rates in the Policy Library have been determined.

I note that the Policy Library refers to a range of parking rates for retail uses, ie minimum parking rate of 3 spaces per 100m² and maximum parking rate of 5 spaces per 100m². For the supermarket, a rate of 4.2 spaces per 100m² has been used, while for the specialty shops, a rate of 3 spaces per 100m² has been used by Aurecon. In particular, the rate for specialty shops is significantly lower than previously used by the Proponent (4.5 spaces per 100m²). It is unlikely that the parking characteristics of specialty shops would have changed so significantly from 4.5 to 3 in such a short period of time.

There is a lack of parking alternatives in the area, in the event that the parking provision is significantly under-estimated. From Council's experience, parking in the adjacent streets such as Glengyle Terrace is already close to capacity, due to increased use of the trams. Any significant parking shortfall from the development would impact on the existing residential zones.

Having regard to the above conditions, it is considered that the use of a parking rate of 4.5 spaces per 100m² would be a reasonable approach for the development. It represents an approximate 20% discount on the normal parking rate, by considering the availability of public transport services in the vicinity.

Applying the 4.5 rate to the proposed retail floor area of 5,372m² would yield 242 spaces.

The parking rate for serviced apartments in the Policy Library seems to be overly low. The commonly adopted parking rate is one space per serviced apartment. It is unlikely that many tourists would rely on public transport as a mode of transport when visiting Adelaide. If some discounting were to be considered, it should be on the basis of likely occupancy. I note that an average occupancy of approximately 70% was identified in the 2009 report. For the proposed 26 serviced apartments, taking the occupancy into account and using one space per apartment, this use would require 18 spaces. These 18 spaces would need to be reserved for this use, given that a visitor checking in would be expected to be provided with a dedicated parking space during the stay.

There are two different types of residential apartments proposed. Forty (40) of these would be associated with affordable housing rentals at the East Tower (14 spaces for 16 apartments) and West Tower (23 spaces for 24 apartments). Parking demand data is not available for affordable housing developments. However, it can be expected that its car ownership characteristics would be lower than for private residential apartments. The Proponent's allocation of 37 spaces for these housing renters would seem to be reasonable.

For the 42 private apartments in the North Tower (24 two-bedroom and 18 three-bedroom apartments), applying the Policy Library rates would yield a parking requirement of 57 spaces (occupant and visitor parking). As the Policy Library rates take into account the mixed use characteristics and within a corridor zone, the 57 spaces would be the assessed rate for the development.

The commonly adopted parking rate for an office use is 4 spaces per 100m². If the same approach of discounting by 20% were to be used for this use, the proposed 890m² office area would require 29 spaces.

Shared parking opportunity, to reduce the overall parking demand on the subject site, is assessed by taking into account the different peak parking characteristics of each land use. The key assessment period for the parking would be during the peak shopping period on Saturday. A summary of the parking requirement for the development is given below.

Use	Peak shopping Sat
Retail	242
Office	Closed
Serviced apartments	18
Private apartments	57
Affordable apartments	37
Hotel	160
TOTAL	514
PROVISION	448
SHORTFALL	66

Based on the above assessment, even after taking into account the mixed use characteristics, corridor zone type development (where maximising the use of public transport is adopted) and shared parking opportunity, the estimated parking shortfall of 66 is considered to be unreasonably excessive.

To address the parking shortfall issue, the Proponent could increase parking on-site or reduce floor areas.

It is reiterated that the hotel parking demand is based on 2007 data, which should be updated to reflect more current conditions.

Traffic Impacts:

The traffic impact of the proposed development has been calculated based on (AIMSUM) modelling work undertaken by Aurecon, in consultation with DPTI. It is assumed that the modelling work complies with DPTI's requirements.

The outcome of the modelling indicates a general worsening of the network operations at the intersection of Anzac Highway/Marion Road and nearby intersections. This is not unexpected, given that the proposed development would significantly increase peak hour traffic flows in the road network and the fact that

the current intersection of Anzac Highway/Marion Road is already operating at capacity.

It is unclear what range of intervention treatments were considered during the modelling work. Options such as grade-separation of the tram crossing (similar to South Road), intersection widening, signal phasing changes and lengthening lanes should be considered. It is also unclear what DPTI's road widening requirements are for the immediate intersection of Anzac Highway/Marion Road, given that substantial building structures would be located at the road boundaries.

Traffic from the west along Anzac Highway have poor accessibility to the main car park of the development. If this traffic is unable to directly turn right into the main car park, the options would include a more circuitous route, for example using Cross Road to enter via the Marion Road access point, or more likely using Mornington Avenue-Elizabeth Avenue past an existing school. This poor accessibility would create undesirable through traffic impacts in the local streets.

If access out to Marion Road is poor, and this would be likely to be the case given the current congestion at the Marion Road/Anzac Highway intersection, tram crossing and Marion Road/Cross Road, more traffic from the development would filter through local residential streets to turn into Cross Road instead.

Aurecon estimates that during the afternoon peak, up to 96 vehicles (or approximately 1,000 vehicles per day) would use the local road network. If access to the development is poor from Anzac Highway and Marion Road, due to the congestion at the intersection, the amount of traffic estimated to use the local road network could be much higher than indicated.

In terms of local road impact, there would be a number of streets that would experience significant increases in traffic volumes, compared to the current situation. While these increases may not result in over-capacity issues, they nevertheless would require traffic management measures to mitigate the impacts arising from the proposed development. As the adjacent main road intersections become more congested due to the impacts of the proposed development, increasing through traffic movements using local residential streets such as Glengyle Terrace could also result. This would be a direct result of the proposed development.

The Proponent has not identified appropriate traffic management measures that would address these impact issues.

Elizabeth Avenue is proposed to be the main service vehicle exit route for the development. Significant numbers of service vehicles are expected to use this local residential street and there are a number of existing residential properties located adjacent to and opposite the subject site that would be impacted. Conditions relating to service times have not been proposed to limit the impact on residential properties after hours, other than a statement that servicing and waste management will comply with EPA noise requirements.

As Elizabeth Avenue would be the designated exit route for service vehicles to Marion Road, to ensure that traffic flow is not impeded, on-street parking would have to be removed. This impact has not been identified in the Development Report. The loss of on-street parking would affect a residential property (units) and a community hall. Unlike other developments where this loss of on-street parking may be "compensated" by availability in the development car park, the design of this development effectively creates a barrier of buildings and walls to Elizabeth Avenue, such that shared parking between these affected properties with the development site would not occur, even though the removal of the on-street parking is a direct result of the development.

Council is unable to check queuing issues at the junction of Elizabeth Avenue/Marion Road as the detailed modelling results have not been provided (eg forecast queue length, delays etc). The right turns out from Elizabeth Avenue would be a very difficult manoeuvre to undertake, given the high traffic flows and proximity of the tram crossing. Widening of Elizabeth Avenue may also be required to accommodate the left turn and right turn exit movements, including ensuring that semi-trailers are able to turn left out to Marion Road. A detailed discussion of this issue has not been provided and upgrade measures not identified. If there is a lack of upgrade measures, more traffic from the development would likely use the rear residential streets to reach Cross Road or Anzac Highway, thereby creating an undesirable impact on the adjacent Residential Zone. As Council would be responsible for managing the traffic impact on the local road network, more details should be provided for Council assessment. Measure such as road closures or other traffic control devices, to separate the residential uses from this development, may be necessary.

Service vehicles are required to turn left out to Marion Road. However, measures are not detailed on how this would be achieved. The alignment of the exit movement should be tightened up and angled appropriately to force large vehicles to turn left out as intended. NO TRUCK signs should also be considered to prevent service vehicles from turning right out to use the nearby residential streets.

Pedestrians:

Wayfinding signs are proposed between the subject site and the nearest tram stop, however, details have not been provided on the signage, location and effectiveness in directing users between these two facilities.

The Development Report has not given detailed consideration on how pedestrians would be encouraged to utilise the tram services which is one of the major reasons to justify discounting of the parking provision for the development.

For example, the City-bound tram stop is located east of Marion Road. For users from the development, they would need to walk along the western footpath, cross the tram lines to use the pedestrian signal to cross Marion Road. This would involve doubling back. It would be very likely that these users would cross Marion Road using the central median as refuge, immediately south of Elizabeth Avenue. There appears to be no consideration of how these pedestrian crossing movements are to be managed between the tram stop and development site.

Because the Neighbourhood Centre is split by major arterial roads and the tram stop is located some distance away from the subject site, the *Minster's Guidelines* is quite clear on the need to analyse the pedestrian desire lines and measures that would provide safe and convenient pedestrian connections. This detailed pedestrian analysis has not been undertaken.

While the West Tower is part of the development site, there is very poor pedestrian connection between residents of this tower and the main shopping centre. This tower seems to be disconnected from the main site. Residents would have to exit the building, walk along the Elizabeth Avenue and Marion Road footpaths before being able to enter the mall entrance in Marion Road.

Similarly, there is poor pedestrian accessibility between the adjacent residential area and the main shopping centre. This adjacent residential area would be expected to be an important catchment for the shopping centre. Due to the barrier created by the service roadway, supermarket wall, car park ramp and the East Tower, there is no opportunity for a pedestrian to directly enter the mall from Elizabeth Avenue. The development therefore does not provide satisfactory linkages that would encourage nearby users to walk to the shopping centre. Therefore, if one of the reasons for reducing parking provision is to encourage walking as a mode of transport, the poor pedestrian connectivity, even for the development's West Tower, would seem to discourage walking as a mode of access for some users.

Stormwater Assessment Standards:

In relation to stormwater considerations, the DAC guidelines for this development site as well as the West Torrens (City) Development Plan have many requirements in relation to water sensitive urban design (WSUD), stormwater detention, quality, retention and reuse. The development report provides little information on how these requirements will be met. Detail is provided stating that "around" 100kl of water will be collected in storage tanks but there appears to be no decision made as yet as to whether this water will be re-used or released into Council's stormwater system.

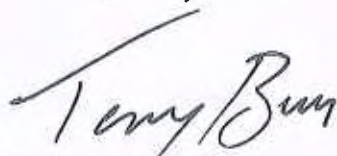
Given that ultimately any stormwater run-off from the site will be entering Council's stormwater system, Council requests that the applicant enters into discussions with the City Assets Department to establish an effective and well integrated stormwater management system.

Construction Environmental Management Plan CEMP:

The formulation of a CEMP for a development of this scale and prominence is critical because of, amongst other things, the impacts on the receiving Council stormwater networks and receiving waterways. Therefore, due to the potential ramification of these measures on receiving Council infrastructure, Council requests that it be provided with the CEMP in order for it to assess the nominated documentation and actions prior to finalisation of the development design

Once again, thank you for the opportunity to provide comment and should you require further information, please contact Janine Lennon. Manager City Development on 8416 6271.

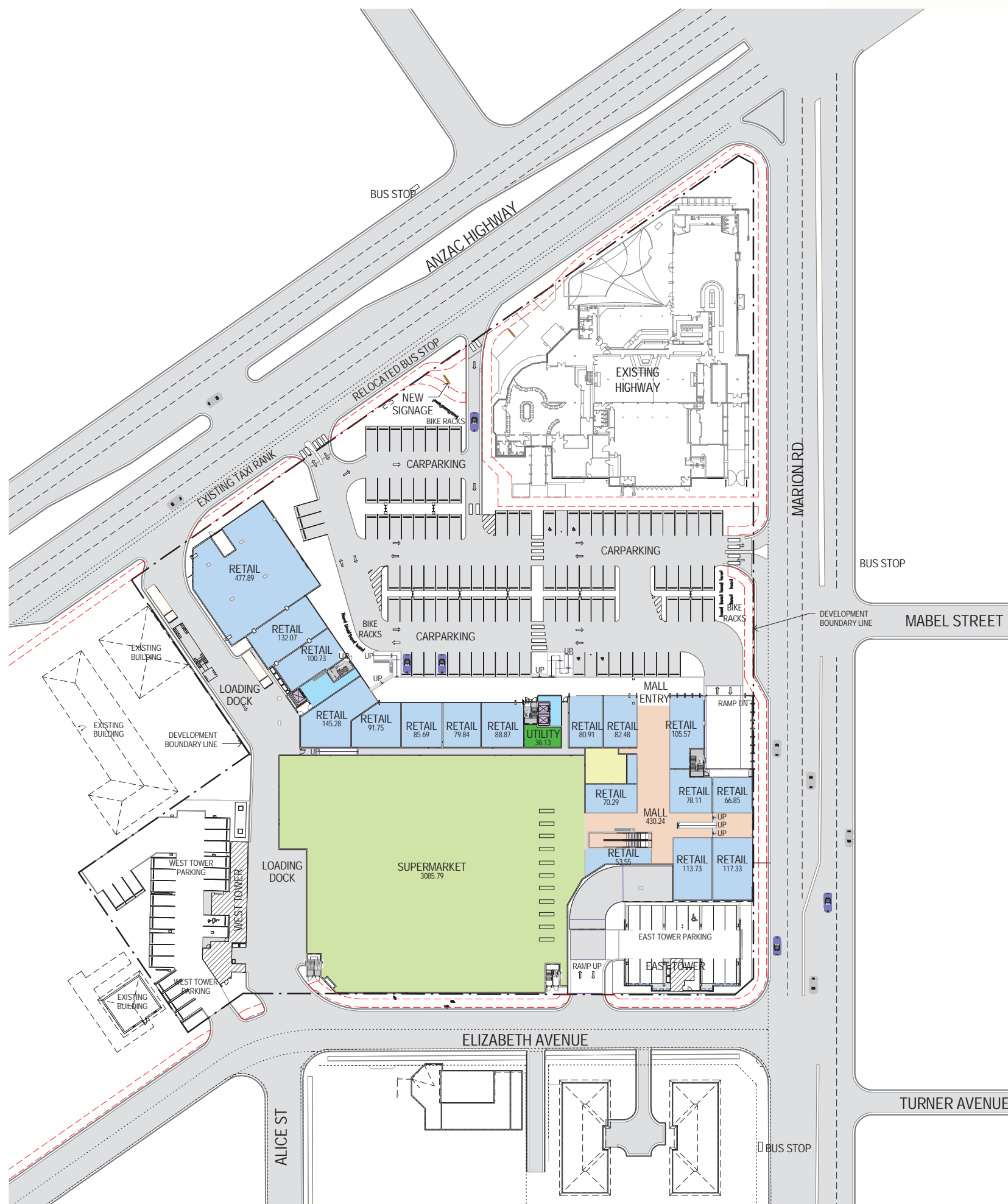
Yours sincerely

A handwritten signature in black ink, appearing to read "Terry Buss". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

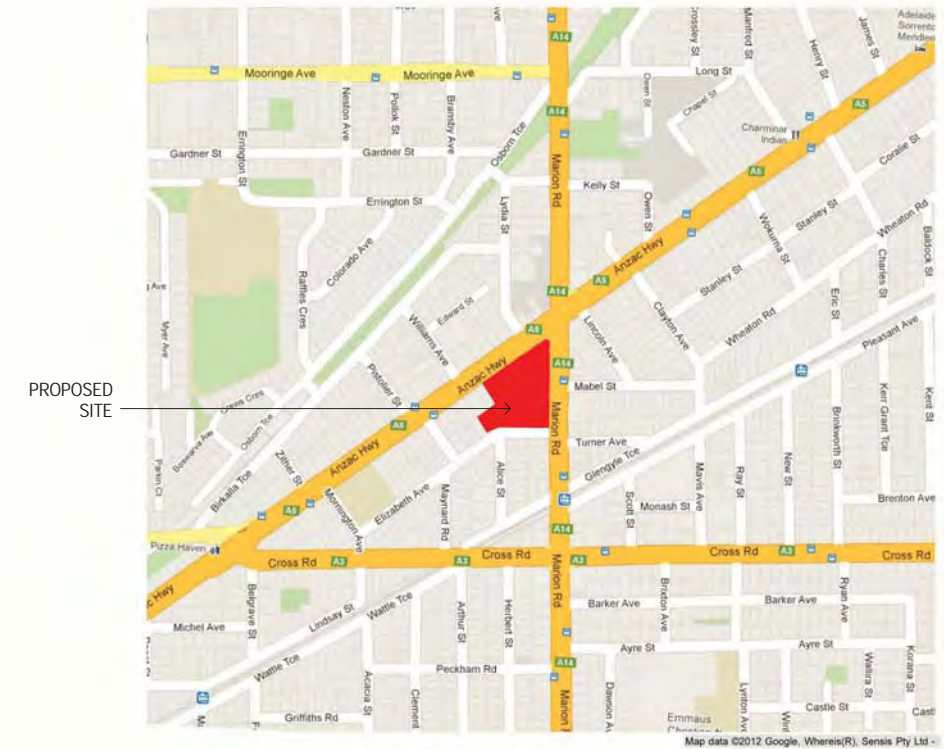
Terry Buss
Chief Executive Officer

APPENDIX 2

AMENDED PLANS



SITE PLAN
SCALE 1:500



LOCATION PLAN
NOT TO SCALE

Apartment Schedule

Serviced Apartments	13 per floor x 2 levels 1 bed apartments - 12 2 bed apartments - 14	26 Apartments
North Tower	8 per floor x 3 levels 2 bed apartments - 24	24 Apartments
	6 per floor x 3 levels 2 bed apartments - 18	18 Apartments
East Tower	4 per floor x 4 levels 2 bed apartments - 16	16 Apartments
West Tower	6 per floor x 4 levels 2 bed apartments - 24	24 Apartments
TOTAL		108 Apartments

Apartments per Bed Numbers

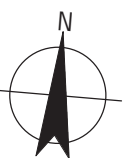
1 Bed Apartments	12	(12 Serviced)
2 Bed Apartments	78	(14 Serviced)
3 Bed Apartments	18	(12 Serviced)
TOTAL	108 Apartments	(26 Serviced)

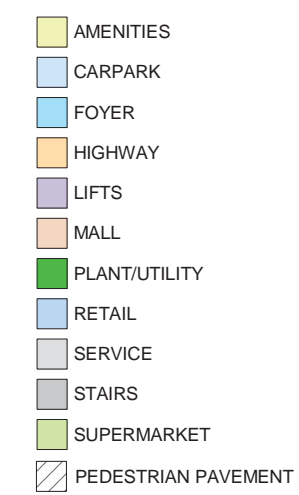
Landscape Schedule

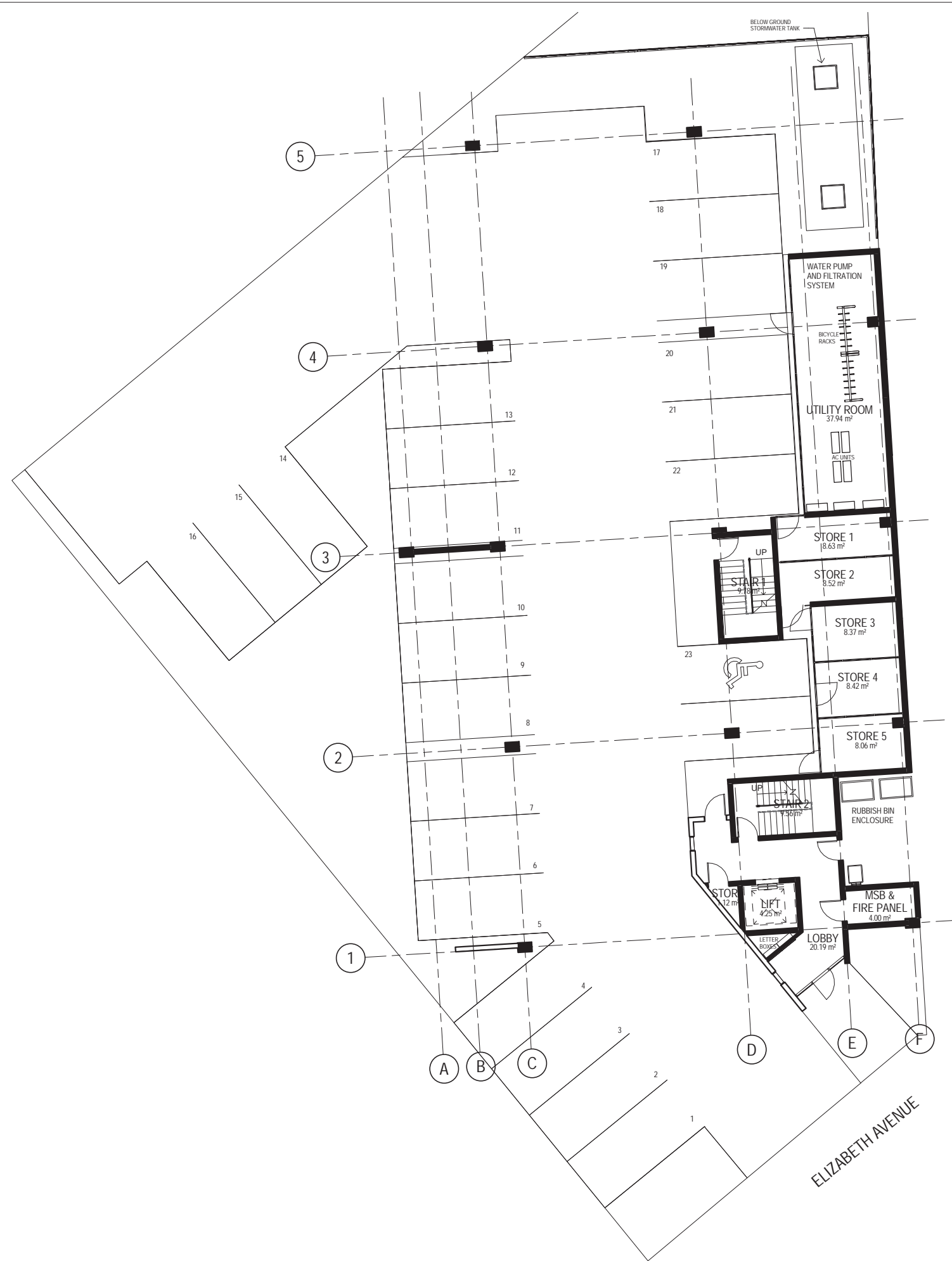
TREES - STREET & CARPARK
 PLATANUS - (Ornamental/London Plane)
 PYRUS - (Ornamental Pear)

DRYLAND GARDEN BEDS
 CYCADALES - (Cycad)
 YUCCA
 DIANELLA REVOLUTA (Black-Anther Flax Lily)

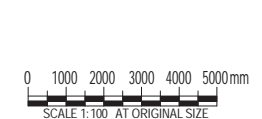
GROUND COVER
 CALOSTEMMA PURPUREUM - (Garland Lily)



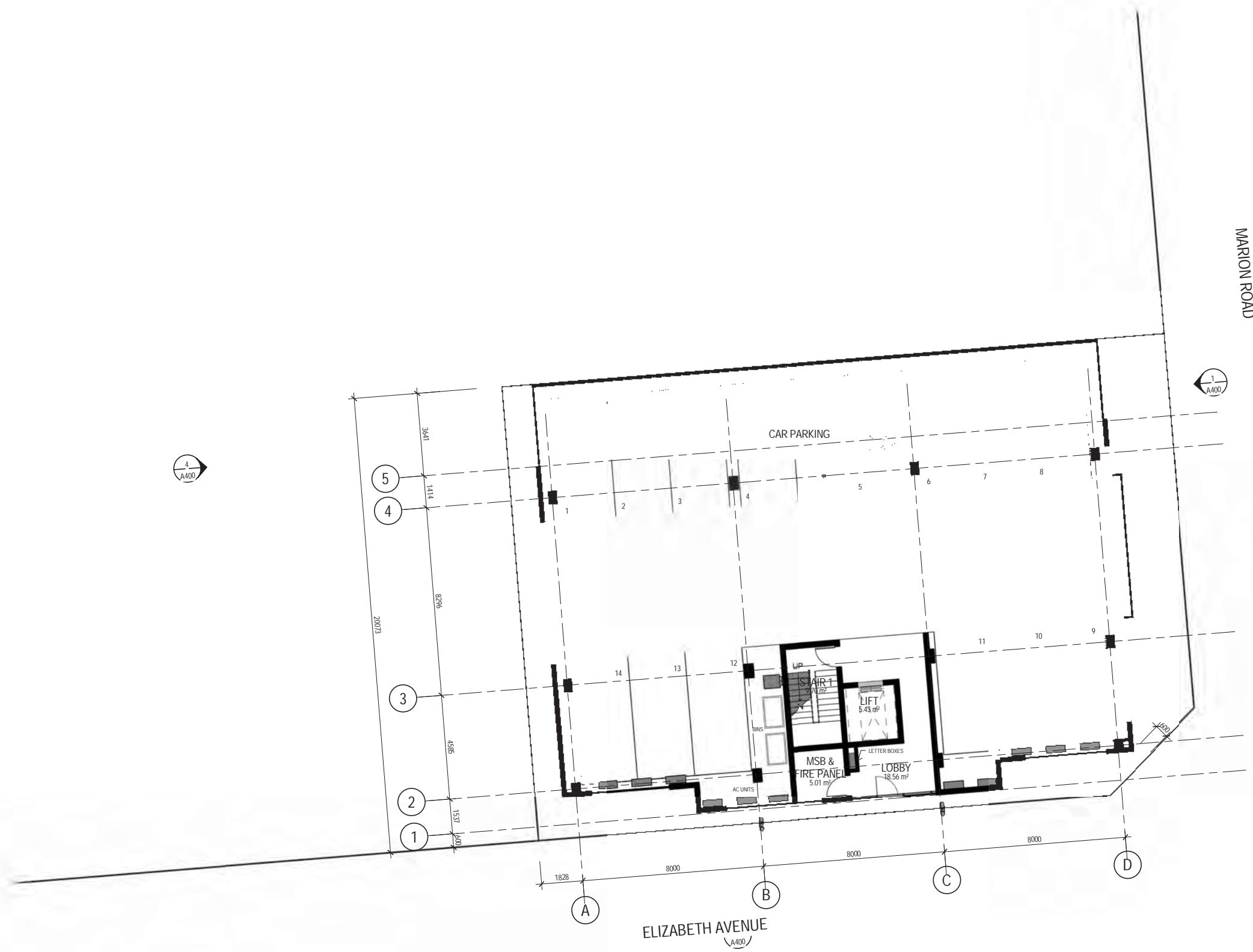




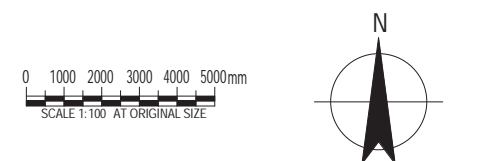
GROUND FLOOR PLAN
SCALE 1:100

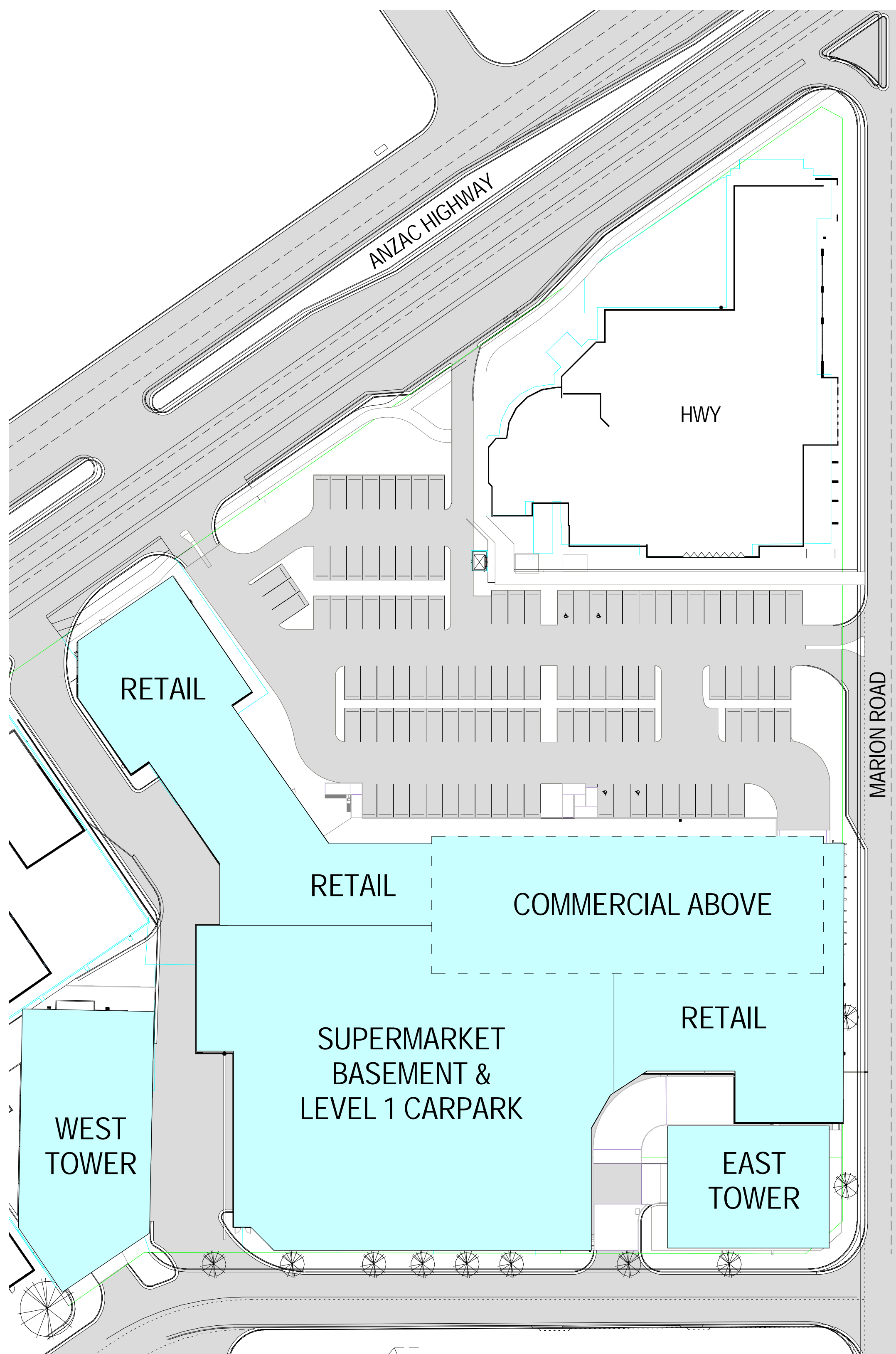


PRELIMINARY

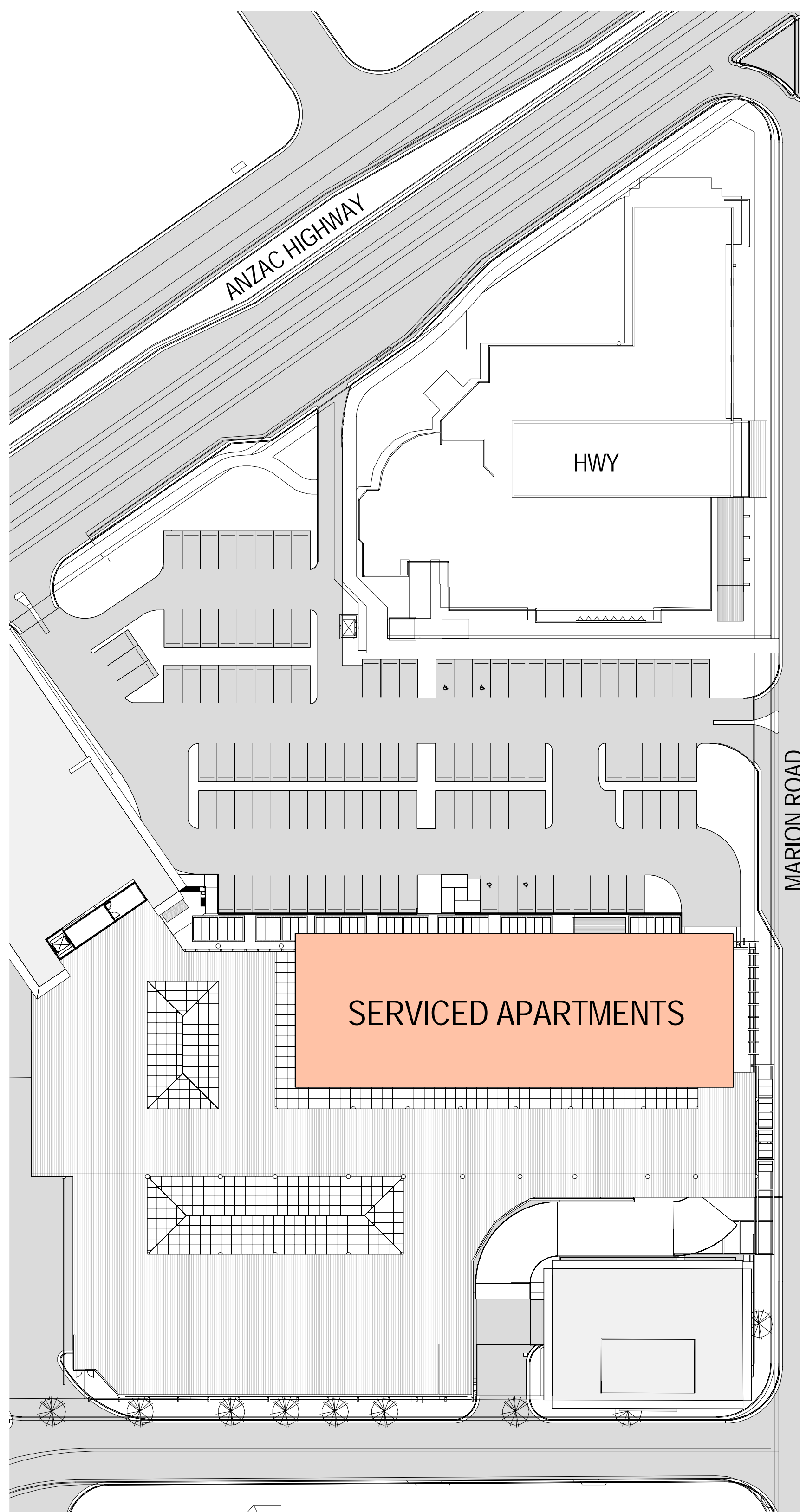


GROUND FLOOR PLAN
SCALE 1:100

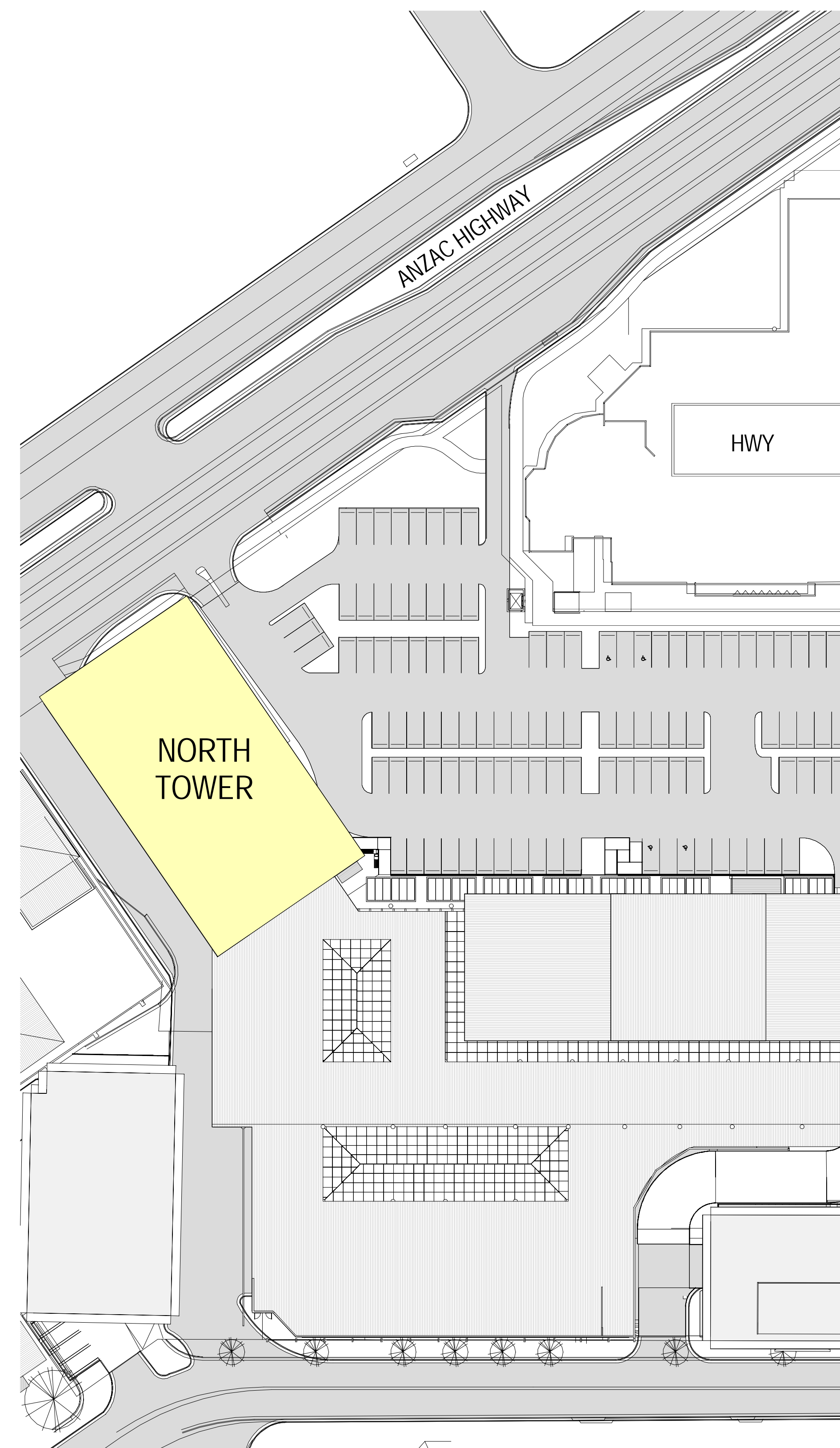




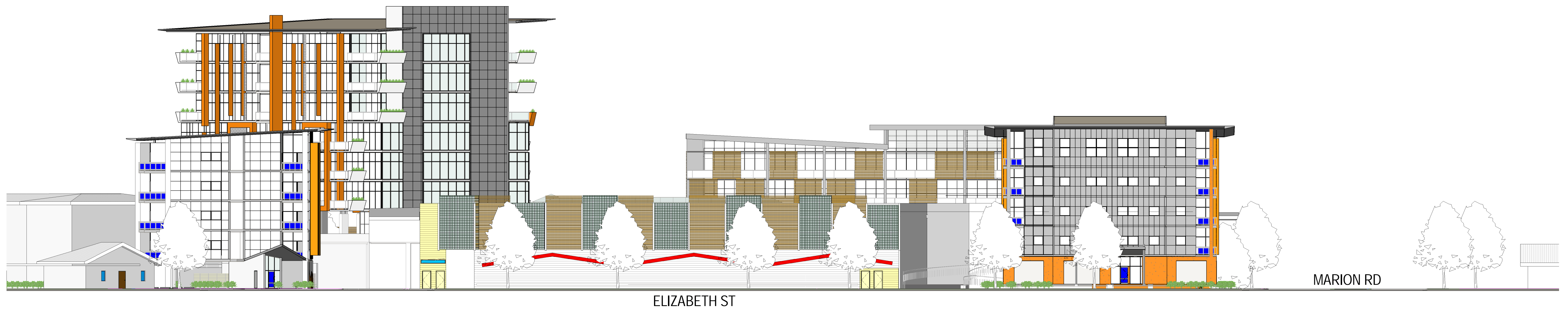
STAGE 1



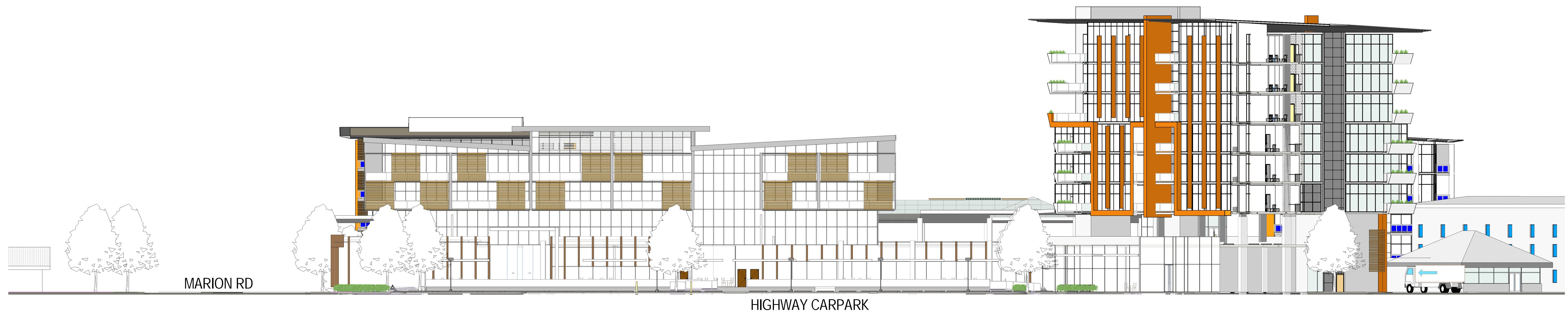
STAGE 2



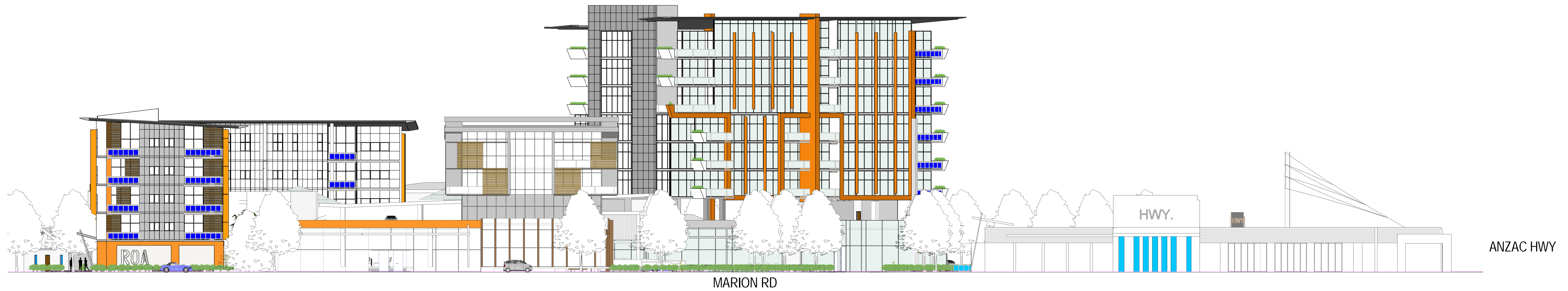
STAGE 3



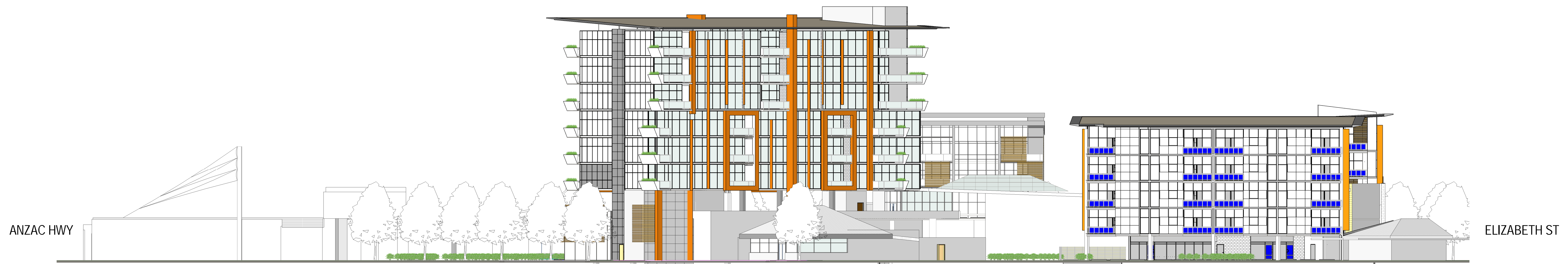
SOUTH ELEVATION
SCALE 1 : 250



NORTH ELEVATION
SCALE 1 : 250



EAST ELEVATION
SCALE 1 : 250



WEST ELEVATION
SCALE 1 : 250







SITE LOCATION

APPENDIX 2



PLYMPTON MIXED USE DEVELOPMENT SITE