

26 February 2025

State Planning Commission
GPO Box 1815
ADELAIDE SA 5000

Via Plan SA portal

Dear Sir/Madam

REFERRAL RESPONSE - DEVELOPMENT APPLICATION 24003161
AMENDED PLANS DATED 1/2/24
FIVE STOREY MIXED USE BUILDING
AT 212 CHURCHILL ROAD, PROSPECT SA 5082

Thank you for providing Council with the opportunity to make comment on the revised details for the proposed development, pursuant to Regulation 23(2)(b) of the PDI Regulations 2017. Based on the revised information provided, Council's comments are outlined below.

Stormwater/Civil

No revised documentation has been provided that addresses the comments below:

- a) A discrepancy has been noted between the architectural plans and site drainage plans. Architectural Plan Sheet A1.2 indicates 2 x 10,000 litre underground retention tanks next to the proposed laundromat, however Siteworks and Drainage Plan Drawing S03-2 indicates 2 x 10,000 litre rainwater water tanks at the rear of the property. The plans should clearly identify the location, types and sizes of the detention and/or retention tank.
- b) City of Prospect requirements are:
 - Pre-development flows are to be calculated for the 5% AEP storm event.
 - Post-development flows are to equal the pre-development flows, for the 5% AEP storm event, or a maximum of 20L/s, whichever is lesser (that is, if the pre-development flow is less than 20L/s, then adopt the pre-development flow).
 - There must be one Legal Point of Discharge (LPD) per site.

The proposal does not demonstrate the above requirements.

Therefore, in the event SCAP support the proposal, it is recommended that planning consent is subject to a Reserved Matter that seeks the proposal to demonstrate compliance with Council's requirements listed above.

Traffic and Transport

The information provided does address the queries previously raised, therefore the following comments are still relevant:

- a) The application should demonstrate that the vehicle stacker system would accommodate the B99 vehicle, rather than the B85 vehicle, particularly on the upper parking module where the height of the vehicle may exceed the available clearance. Alternatively, the applicant should explain how this would be mitigated.
- b) The applicant should provide an explanation on how the restrictions in parking would be managed to allow the 6.4m SRV to use the site, and what mitigation measures are in place should a vehicle be occupying the space during the parking prohibition period.
- c) It should also be clearly demonstrated how visitors would access the car parking spaces, as the development cannot rely on on-street car parking.
- d) The plans do not illustrate the setback distance between the crossover and the closest street tree or stobie pole.
- e) Please note that Councils *Driveway Crossover Policy* states the following requirements and minimum clearances:

Crossover should be located:

- A minimum 5.4m distance from any adjacent crossover
- Minimum 2m setback from any street tree
- Minimum 1m setback from a stobie pole
- Minimum 2m setback from a stormwater outlet
- Any redundant crossovers not providing access shall be reinstated to the satisfaction of Council.

Stormwater outlet should be located:

- Minimum 2m setback from a crossover
- Minimum 1m setback from a stobie pole

It is recommended the plans are amended to include the above.

- f) All works proposed on Council road reserve requires a permit pursuant to Section 221 of the *Local Government Act 1999*. To date, no approval has been granted for any works to occur. Please note in the event Council supports the removal of its street tree, all costs associated with this would be borne by the developer.

Street Trees/Landscaping

The development proposes the removal of a street tree at the front of the site, and it is noted that the revised plans illustrate a Transformer to be located at the front of the site. The Transformer and (minimal) landscaping proposed at the front of the site would be located in the area of land proposed for future road widening.

In the event the Department of Infrastructure and Transport obtain the area of land for future road widening, the subject land will have **no deep soil zone or soft landscaping** located at the ground level.

The Urban Corridor Zone policies were revised in 2017 to introduce deep soil zones and improve the quality of landscaping and interface along Churchill Road. This Development Plan Amendment (DPA) was as a result of negative community feedback received by both Council and the State Planning

Commission, that the built form outcomes being established from the new medium-high rise developments were not achieving the desired 'boulevard' affect.

It is noted a landscaping plan has been provided for the roof top. However, the plan does not address the following concerns previously raised:

- a) If the landscaping plan does not clearly identify the location of plantings and their species, it therefore creates a difficult challenge for Council to ensure the application complies with their development approval, and subsequently undertake enforcement action, in the event the landscaping is not undertaken.
- b) It has not been demonstrated how the tree planting would be established at the front of the site, noting the first balcony overhang.
- c) No arborist report has been provided to support of removal of the regulated tree.

Impact on Local Heritage Place

No local heritage listed places adjoining or near the subject land.

Conclusion

Thank you for the opportunity to provide a report to the State Planning Commission on this application. Council has insufficient information to indicate support for the development when considered against the scope of the matters that Council is empowered to review under Regulation 23(3) of the Planning, Development and Infrastructure (General) Regulations 2017.

Based on the information provided, unfortunately Council cannot support the application in its current form.

Should you wish to discuss the above comments or require clarification, please contact Council's Team Leader Development Services, Susan Giles at the Council office.

Yours sincerely



Chris White
Chief Executive Officer

5 August 2024

State Planning Commission
GPO Box 1815
ADELAIDE SA 5000

Via Plan SA portal

Dear Sir/Madam

**REFERRAL RESPONSE - DEVELOPMENT APPLICATION 24003161
AMENDED PLANS
FIVE STOREY MIXED USE BUILDING
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Thank you for providing Council with the opportunity to make comment on the revised details for the proposed development, pursuant to Regulation 23(2)(b) of the PDI Regulations 2017.

Based on the information provided, Council's comments are outlined below.

Stormwater/Civil

- a) A discrepancy has been noted between the architectural plans and site drainage plans. Architectural Plan Sheet A1.2 indicates 2 x 10,000 litre underground retention tanks next to the proposed laundromat, however Siteworks and Drainage Plan Drawing S03-2 indicates 2 x 10,000 litre rainwater water tanks at the rear of the property. The plans should clearly identify the location, types and sizes of the detention and/or retention tank.
- b) City of Prospect requirements are:
- Pre-development flows are to be calculated for the 5% AEP storm event.
 - Post-development flows are to equal the pre-development flows, for the 5% AEP storm event, or a maximum of 20L/s, whichever is lesser (that is, if the pre-development flow is less than 20L/s, then adopt the pre-development flow).
 - There must be one Legal Point of Discharge (LPD) per site.

The proposal does not demonstrate the above requirements.

Therefore, in the event SCAP support the proposal, it is recommended that planning consent is subject to a Reserved Matter that seeks the proposal to demonstrate compliance with Council's requirements listed above.

Traffic and Transport

- a) Section 2 of the *Transport Statement* prepared by ML Traffic Engineers, dated 20/6/2024, states that 11 car parks are required, however the calculation should be 18.75. The inconsistency should be reviewed and clarified.
- b) The application should demonstrate that the vehicle stacker system would accommodate the B99 vehicle, rather than the B85 vehicle, particularly on the upper parking module where the height of the vehicle may exceed the available clearance. Alternatively, the applicant should explain how this would be mitigated.
- c) The applicant should provide an explanation on how the restrictions in parking would be managed to allow the 6.4m SRV to use the site, and what mitigation measures are in place should a vehicle be occupying the space during the parking prohibition period.
- d) It should also be clearly demonstrated how visitors would access the car parking spaces, as the development cannot rely on on-street car parking.
- e) The plans do not illustrate the proposed width of the crossover, the proposed width of the driveway, or the setback distance between the crossover and the closest street tree or stobie pole.
- f) Please note that Councils *Driveway Crossover Policy* states the following requirements and minimum clearances:

Crossover should be located:

- A minimum 5.4m distance from any adjacent crossover
- Minimum 2m setback from any street tree
- Minimum 1m setback from a stobie pole
- Minimum 2m setback from a stormwater outlet
- Any redundant crossovers not proving access shall be reinstated to the satisfaction of Council.

Stormwater outlet should be located:

- Minimum 2m setback from a crossover
- Minimum 1m setback from a stobie pole

It is recommended the plans are amended to include the above.

- g) All works proposed on Council road reserve requires a permit pursuant to Section 221 of the *Local Government Act 1999*. To date, no approval has been granted for any works to occur.

Waste Management

- a) There is little information provided regarding the waste management. The traffic report mentions movements of a 6.4m SRV within the site however it does not specify what this vehicle does.
- b) The plans do not illustrate a dedicated area for wash bay facilities on site, for the ongoing maintenance of bins.
- c) It is recommended that the waste collection occurs during off-peak periods to mitigate internal congestion. Therefore, in the event SCAP support the proposal, the following condition is recommended:
 1. Refuse collection for the site shall only occur after 7am and before 10pm Monday to Friday, and after 9am and before 7pm on Saturday and Sunday (if applicable).

Trees/Landscaping

- a) The planting species on the landscape plan are cut off and the full species names cannot be seen.
- b) The landscaping plan does not include details the roof top garden, and/or how it would be established and maintained.
- c) If the landscaping plan does not clearly identify the location of plantings and their species, it therefore creates a difficult challenge for Council to ensure the application complies with their development approval, and subsequently undertake enforcement action, in the event the landscaping is not undertaken.
- d) The species nominated are not considered suitable for the following reasons:
 - Mature height of understorey species should be <600mm to avoid impacting sightlines, particularly adjacent driveways and footpaths.
 - High planting around doorways and adjacent footpaths create CPTED issues.
- e) It has not been demonstrated how the tree planting would be established at the front of the site, noting the first balcony overhang.
- f) In the event that DIT acquire the land proposed for future road widening, the development would have **no landscaping on site**.
- g) No arborist report has been provided to support of removal of the regulated tree.

Impact on Local Heritage Place

No local heritage listed places adjoining or near the subject land.

Other

In the event SCAP support the proposal, the following conditions are recommended:

1. Footpaths adjacent to the site are to be kept in a safe condition for pedestrians at all times during construction works. All driveways and footpaths traversed by vehicles using the site are to be maintained in a reasonable condition for the duration of the works, and are to be reinstated to the satisfaction of Council on completion of the works.

No obstruction of the footpath or roadway may occur without the prior permission of Council. For further advice, please contact Council's Infrastructure and Environment Department on 8269 5355.

2. A Construction Traffic Management Plan shall be prepared and submitted to Council prior to the grant of Development Approval. The plan shall comply with the requirements of Section 25 of the *Environment Protection Act*, which states "a person must not undertake an activity that pollutes or might pollute the environment unless the person takes all reasonable and practicable measures to prevent or minimise any resulting environmental harm". The Construction Site Management Plan shall include:
 - a) Construction staging and methodology;
 - b) Traffic and access requirements – including but not limited to, deliveries and crane/ heavy machinery access and impacts noting that the build would need to be staged from the rear carpark;
 - c) Measures for the reduction of potential for mud and material drag out from the site by providing a hard surface at the entry/exit points to the site and a controlled washing zone prior to exiting the site; and

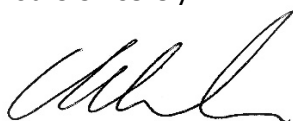
- d) Containment of water run-off within the site, which will be filtered and cleaned to the satisfaction of Council if being discharged into the stormwater system; and
- e) Reduction of the potential for dust and other airborne particles by the use of water sprinklers and/or other means of containment; and
- f) The establishment of a compound for the storage of waste materials and litter. The compound must be covered to prevent litter from being blown away from the compound; and
- g) Measures to minimise the potential for noise pollution through correct positioning of all mechanical equipment to ensure compliance with the requirements of the Environment Protection (Noise) Policy.

Conclusion

Thank you for the opportunity to provide comment on the revised plans and details. The proposal lacks clarity on the method of waste management, landscaping, impacts to Council road reserve, and does not achieve Council's requirements for stormwater disposal. Therefore, unfortunately Council does not support the development in its current form.

Should you wish to discuss the above comments or require clarification, please contact Council's Team Leader Development Services, Susan Giles at the Council office.

Yours sincerely



Chris White
Chief Executive Officer