09 January 2025

Mollie O'Connor
Senior Planning Officer
Planning and Land Use Services
Department for Housing and Urban Development
Level 10, 83 Pirie Street
Adelaide SA 5000

Our Ref: 53469LET02

Dear Mollie

Response to Referral Advice - Application ID 24029819 at 162 - 168 Gouger Street, Adelaide

MasterPlan act for the applicant, Square Mile Properties Pty Ltd, in respect of Development Application ID 24029819 for the construction of a mixed-use building up to 16 levels in height, comprised of 107 dwellings with podium car parking and three ground level shops at 162 – 168 Gouger Street, Adelaide.

The application has been referred to both the Government Architect, representing the Office for Design and Architecture SA ('ODASA'), and the City of Adelaide ('Council'). Each entity has provided advice to the State Commission Assessment Panel ('SCAP'), highlighting matters for the applicant's consideration. Based on this feedback, you have incorporated several of their recommendations into your formal Request for Information ('RFI') on behalf of the State Planning Commission ('SPC'), dated 18 November 2024.

This letter outlines the applicants response to the items raised in the RFI, along with other relevant comments from prescribed bodies. This correspondence should be read in conjunction with the following accompanying documents:

- Response Letter, prepared by Structural Systems.
- Updated Civil and Drainage Documentation, prepared by Structural Systems.
- Response Letter, prepared by Vipac.
- Street Tree Plan, prepared by MasterPlan.
- Response Letter and Traffic Survey, prepared by Phil Weaver & Associates.

Waste Management – Council and SPC

The Councils comments in respect to waste management are noted and acknowledged. As mentioned, the residential bins will be secured to ensure that commercial and residential waste streams remain separate.

Private collection services will be used for all commercial waste and organics.

Traffic and Parking – ODASA, Council and SPC

The consolidation of vehicle movements to Storr Street

The previously stated position on this issue has not changed. Oakley Street is the safer and more efficient option for resident vehicle access.

Relocation of vehicle access to Storr Street is not optimal and would result in additional services infrastructure being relocated to the Oakley Street frontage (the more active of the two small street frontages).

Furthermore, the reorientation of the access Ramp and its resulting configuration will result in unacceptable internal configuration of the ground floor level and negate the opportunity to provide the desired setback from Oakley Street adjacent to the Local Heritage Property, which is considered on balance a better design outcome regarding the context of the site and locality.

Net Traffic Impact on Intersections

We refer to the enclosed advice prepared by Phil Weaver & Associates which addresses the traffic matters raised by SPC. To inform this advice traffic surveys were undertaken in the morning and afternoon peak periods over two business days in November 2024 for the intersections of Oakley Street/Gouger Street and Oakley Street/Grote Street.

With consideration of the traffic generation estimates for the proposed development, being 18 movements in the morning and afternoon peaks, the accompanying advice concludes that the forecast traffic volumes would be less than the daily variation in traffic movements for theses intersections and is therefore unlikely to affect the operation the intersections to a discernible level.

Waste Room Headroom Clearance

The height of the waste room clearance being 3.8 metres is sufficient to accommodate the waste collection vehicles proposed to access this area. This view is shared by the projects waste consultant, Colby Phillips Advisory, and advising traffic engineers Phil Weaver & Associates.

Bicycle Parking Numbers

We acknowledge that the number of bicycle parking spaces provided within the ground floor bicycle store does not satisfy the Planning and Design Code ('the Code') parking rate. This issue has been previously addressed within the application material.

The proposal provides formal bicycle storage for up to 56 bicycles within the ground floor storage area which will be for shared use between visitors, residents and employees of the retail tenancies.

We note that based on experience with similar developments, many residents prefer to store bicycles within their own apartments for security reasons. The large footprint apartments provide for this possibility. Circulation areas and the lift core are suitably dimensioned to accommodate manoeuvring of bicycles to individual apartments. This possibility free's up a greater proportion of the ground floor storage for visitor and retail employee use.

Whilst no End-of-Trip facilities are currently proposed, we note that residents would not rely on these facilities and that at least two of the three ground floor retail tenancies are of a suitable size to accommodate such facilities within their own footprint should it be desired by the future tenants.

On that basis, we consider that suitable bicycle parking arrangements are provided to accommodate the needs of the development.

Bicycle Store/Workshop/Café

The applicant shares the vision of the Government Architect for an active transport celebrating use such as bicycle shop or café to be located on the northern ground floor tenancy facing Oakley Street, as evidenced by the streetscape visualisations provided (Drawing TP901).

However, this will ultimately depend on market demand and whether such an operator is interested in occupying the tenancy. The applicant can not dictate to the market the specific nature of the retail use for this space, and no tenant has yet been determined.

For the purposes of determining the servicing requirements, the technical assessments have incorporated a conservative approach by assuming a restaurant/café use for these spaces.

Infrastructure and Stormwater – Council and SPC

Universal Access and Levels

The design is based on the existing surveyed footpath levels. These are indicated at each doorway. The differences between survey points are minimal due to the flat nature of the footpath. Any changes to footpath levels intended as part of future streetscape upgrades have not been provided.

Additional levels have been provided in updated Civil Drawings from Structural Systems in order to demonstrate DDA compliance per AS 1428.1.

Fire Booster Relocation

In order to meet SAMFS requirements to position the fire booster near the main site entrance in a clearly identifiable and accessible location, it is not feasible to relocate the fire booster to Storr Street.

Stobie Pole and Streetlight Adjacent Gouger Street

The stobie pole on the south-east corner carries low voltage lines across Gouger Street to the existing buildings on our site. The overhead services from the stobie to the existing buildings will become redundant and will be abolished, as the building will be supplied with new high voltage lines running in from Gouger (or Grote) Street, underground along Storr Street.

We note that the stobie pole has a streetlight on it and can be retained for the purpose of preserving this. The proposed development does not require its removal. It is a Council asset, and its future is at the discretion of the Council.

Overland Flows and Flooding

We refer you to the covering advice provided by Structural Systems along with their updated Civil Drawings.

Based on the flood mapping and site survey, the modelled flood levels are:

- **Eastern side:** 42.09 A.H.D. (grate level 41.87 + ponding depth 0.21).
- **Western side:** 42.04 A.H.D. (grate level 41.82 + ponding depth 0.22).
- **Centre (carpark entrance):** 42.08 A.H.D. (paving level 41.88 + ponding depth 0.20).

The proposed Finished Floor Level (FFL) is 42.25 A.H.D., which is 160–210 millimetres above the 1% AEP flood levels but falls short of the 300mm freeboard required by Council. Meeting the freeboard would require additional ramps, which would significantly reduce usable retail space.

Balancing flood risk with practical usability, the proposed FFL provides adequate clearance above the 1% AEP flood levels while maintaining functional retail space. Given the extremely low occurrence of these events, it is considered a practical and reasonable solution.

To further manage rare flood events, measures like flood-resistant floor finishes (e.g., tiles, concrete) and flood-resistant doors can be incorporated. Additionally, all new developments in the Adelaide City Council area must include detention and retention tanks to reduce flood levels.

Outlet Pipe Hydraulic Capacity for Storr Street and Oakley Street

The proposed development will not increase inflow rates to the pits during any storm events, as shown in the provided calculations. In fact, post-development discharge rates are lower than pre-development rates due to the inclusion of a retention as part of the development.

If the Council believes the existing pipes are already undersized and will remain inadequate despite the reduced discharge rates from the development, this is an existing issue and is not an imposition created by the development.

Landscaping and Street Trees – Council, ODASA and SPC

Confirm Status of the Street trees and any Tree Damaging Activity

Please refer to the enclosed Street Tree Plan, prepared by MasterPlan. The three street trees located on the site's frontages have been surveyed. Two of these trees are Regulated and one does not meet the circumference threshold and is therefore unregulated.

We confirm no "*tree-damaging activity*" is proposed.

The Regulated tree on the Gouger Street frontage will be unaffected by the works. It is entirely enclosed by sealed bitumised footpaths and road which will remain unaffected by the works. An existing building is present on the subject land in exactly the same proximity as the proposed built form. The canopy has grown around this two-storey building and does not encroach into the site boundaries, as such no pruning is required.

The canopy of the Regulated tree on Oakley Street does encroach over the subject land and as such some pruning will be required. As per the **enclosed** plan, we have assessed this pruning to be approximately 15% of the crown and significantly below the threshold of 30% required to trigger a "*tree-damaging activity*" as per Regulation 3F(6)(a) of the *Planning, Development, and Infrastructure (General) Regulations 2017*.

Council's Greener City Streets Program

We acknowledge the request to engage with Council regarding the provision of new service infrastructure within the public realm such that it does not conflict with planned street tree locations within Oakley Street and Gouger Street as part of its Greener City Streets Program.

The applicant is open to accommodating this request and invites the Council's Greener City Streets Program coordinator to contact them to arrange this in due course.

Design – ODASA and SPC

Materials and Finishes

The applicant acknowledges the importance of the overall built form composition and high-quality materials and finishes. It is their intention to deliver an exemplary development outcome in this respect that balances durability, feasibility, and consistency in appearance. The applicant would be pleased to provide physical samples of the external materials selection.

Clarification has been requested in respect to the material selections for brick at the podium level and the concrete finish selection for the tower element. The podium will utilise masonry brick cladding panels, which will be largely visually indistinguishable from three-dimensional brick construction but is a more feasible construction method for a development of this scale and ensuring a consistent appearance across the podium level.

Similarly, the concrete at the tower levels will be a painted finish as detailed in the Architectural Plans. Colour varies significantly with an integral finish approach, and it is the applicants preference for visual consistency across the development.

Natural Light and Ventilation to Both Ends of the Corridor

The natural light and ventilation provided to the southern end of the corridor is considered sufficient to provide an appropriate level of amenity to these circulation spaces.

The design results in greater benefit to maximise apartments access to northern light.

Consideration of Further External Shading Devices

This issue was discussed during the design review stage, with advice from the project's sustainability consultant, Stantec, indicating that external shading devices would not provide an efficient sustainability outcome.

The South Australian Government's target of achieving net 100% renewable electricity by 2027 means that embodied carbon in materials will become the primary contributor to a building's carbon footprint. Aluminium, concrete, and steel have the highest embodied carbon, with aluminium being particularly significant.

Reducing operational energy use, such as limiting heat gain through solar control and consequently lowering air-conditioning demand, is essential to offset the upfront carbon from construction. This can be achieved through either glazing or shading systems.

Advancements in glazing technology now allow high-performance coatings to block approximately 80% of solar heat gain from entering the building without the need for shading. For shading to achieve similar results, it would need to be extensive, significantly increasing the embodied carbon.

It is also worth noting that the building's architectural design already incorporates substantial shading through projecting balconies, which provide effective shading for the primary living area windows of the apartments below.

Given these considerations, the addition of external shading to all openings would not enhance the project's sustainability and may, in fact, reduce it by increasing embodied carbon unnecessarily.

Wind Protection

It is noted that the Vipac Wind Impact Assessment ("WIA") report dated 5 September 2024 and lodged with the application included a recommendation for the balustrades to the communal outdoor space on Level 3 be made solid and have its height raised to 1.5 metres, as noted in the respective correspondence from ODASA and SPC.

In Vipac's original assessment differing comfort criteria was applied to the private apartment balconies and the communal balconies, with the walking criterion applying to the private apartment balconies and the more stringent standing criterion applying to the communal balconies. This difference in assessment approach for these outdoor spaces was due to the following reasons as stated on Page 14 of the WIA report:

- The private balconies are not public spaces.
- The use of the private balconies is optional, and only intended to be used on fair weather days with calm winds.
- Residents can choose to retreat indoors during uncomfortable wind conditions.
- The private balconies are not for pedestrian use or members of the general public.

It is understood that Vipac's original assessment assumed that the communal balconies on Level 3 would not meet the above conditions as this area would be accessible to members of the general public.

As such, further clarification was sought from Vipac on whether the correct comfort criterion had been applied to the communal balconies given that Level 3 terrace is not a "public" space, but a private communal space for the use of the residents only and therefore subject to the same conditions as the private balconies as listed above.

Enclosed correspondence from Vipac dated 19 December 2024 indicates that, given the above, it is appropriate to also apply the walking comfort criterion to the Level 3 balconies and that wind speeds

on the Level 3 outdoor area are expected to be within the recommended walking comfort levels, and as such "*no further recommendations for wind amelioration are deemed necessary*".

Given the updated advice from Vipac, we are of the view that the communal open space has been designed and sited with appropriate regard to wind effects as sought by PO 32.3 of the Design in Urban Areas module. As such, the applicant has selected to retain the balustrades on Level 3 as currently designed.

Other Matters – ODASA and Council

Affordable Housing

The proposal includes 12 studio apartments which will be brought to the open market at an affordable housing price threshold i.e., $485,000. The applicant does not intend to enter into a Land Management Agreement for the provision of Affordable Housing with the South Australian Hosing Authority due to the permanent nature of this arrangement for future owners.

Heritage

We acknowledge Council's supportive comments regarding the podium design and its interaction with the adjacent Local Heritage Place on Oakley Street. Council has requested consideration of an additional setback at the northwest corner of Level 2. However, this adjustment is not feasible, as it would impact vehicle movement pathways internally and compromise the compliant ramp transition to the upper parking level. Additionally, it would disrupt the structural design due to the positioning of supporting columns within the podium.

We believe the current podium design and setback provide appropriate deference to the heritage place, acknowledging its location at the southern end of the historic, low-scale central portion of Oakley Street. Both the Grote Street and Gouger Street ends of Oakley Street are 'bookended' by higher-intensity, large-scale development in response to the commercial nature of these roads, as indicated in the Heritage Impact Assessment conducted by Dash Architects. We find that the proposed design is consistent with this context.

We note that this matter has not been raised by SPC in their RFI.

Closure

We trust that the further information provided herein, and the accompanying documentation resolves the requests raised in the RFI dated 18 November 2024 and specific commentary outlined in referral advice from ODASA and the City of Adelaide.

Please keep us informed of the time and date the application will be presented to the State Commission Assessment Panel for a decision.

Yours sincerely

Nick Wilson
MasterPlan SA Pty Ltd

Consultant Traffic Engineers
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File: 23-319

8 January 2025

Mr Greg Vincent
MasterPlan
33 Carrington Street
ADELAIDE SA 5000

Via email: GregV@masterplan.com.au

Dear Mr Vincent

PROPOSED MIXED USE DEVELOPMENT – 162 GOUGER STREET, ADELAIDE – RESPONSE TO REQUEST FOR INFORMATION (TRAFFIC ACCESS AND PARKING)

I refer to our previous discussions with respect to the proposed mixed use development on the above site. I note that that the proposed development is the subject of a Request for Information (RFI) document from the State Planning Commission dated 18 November 2024.

More particularly I note that the subject RFI included the following comments in relation to transport, access and parking related matters as reproduced in blue below.

General Development Policies: Transport, Access and Parking

- *Traffic and Access – provide a response (to) resolve matters raised by the City of Adelaide to ensure sufficient traffic movements on and off-site, to achieve PO 1.1, 3.2 and 3.8. In particular:*

  An assessment of the net traffic impact should be undertaken to the intersections of Oakley/Gouger Streets and Oakley/Grote Streets.

  The applicants traffic and parking assessment identifies 3.8 mere headroom clearance for the waste room which is less than:

  - *4.5 metres specified for AS 2890.2: 2018,*
  - *4.0 metres (minimum) recommended by Clause 5.3.7 of the South Australian Better Practice Guide,*
  - *3.9 metres for rear loading waste truck and 4.2 metres for a side loading waste truck specified by the Better Practice Guide for resource recovery and residential developments (NSW Environment Protection authority).*

  Further clarification is sort to demonstrate appropriate headroom for onside waste collection.

Bicycle parking - Provide bicycle parking for visitors and the retail use per PO 9.1 and consider end of trip facilities per PO 9.3

In relation to the first of the above matters, namely an assessment of the net traffic impact associated with the proposed development on the operation of the intersections of *Oakley/Gouger Streets and Oakley/Grote Streets*, this firm conducted traffic surveys at both intersections during peak periods of traffic movements in both the morning and afternoon periods on weekdays.

More particularly these traffic counts (surveys) were undertaken during the periods between:-

- 7.30 am and 9.30 am, and between 3.00 pm and 6.00 pm on Wednesday 27 November 2024 at the four-way intersection of Gouger Street with Selby Street and Oakley Street, Adelaide, and

- 7.30 am and 9.30 am, and between 3.00 pm and 6.00 pm on Thursday 28 November 2024 at the T-intersection of Oakley Street with Grote Street, Adelaide.

The traffic surveys conducted at the intersection of Gouger Street with Selby Street and Oakley Street, Adelaide, comprised counts of traffic entering and exiting the southern end of Oakley Street to and from both Gouger Street and Selby Street by direction of movement in quarter hour periods.

The results of the surveys at the above intersection identified that the peak hourly traffic flows occurred between:

- 8.15 am and 9.15 am, and

- 4.15 pm and 5.15 pm.

It was identified that in the morning peak hour period at the above intersection there was a total of 82 vehicles entering Oakley Street from Selby Street and Gouger Street and a total of 27 vehicles exiting Oakley Street turning onto either Gouger Street or crossing to Selby Street during this period.

It was identified that in the evening peak hour period at the above intersection there was a total of 33 vehicles entering Oakley Street from Selby Street and Gouger Street and a total of 63 vehicles exiting Oakley Street turning onto either Gouger Street or crossing to Selby Street during this period.

The above recorded am and pm peak hour traffic volumes are summarised in *Figure A* included as an attachment to this document.

The traffic surveys conducted at the T-intersection of Grote Street with Oakley Street, Adelaide, comprised counts of traffic entering and exiting the northern end of Oakley Street to and from both Grote Street by direction of movement in quarter hour periods.

The results of the surveys at the above intersection identified that the peak hourly traffic flows occurred between:

- 8.15 am and 9.15 am, and

- 3.00 pm and 4.00 pm.

It was identified that in the morning peak hour period at the above intersection there was a total of 40 vehicles entering Oakley Street from Grote Street and a total of 66 vehicles exiting Oakley Street turning onto either Grote Street during this period.

It was identified that in the evening peak hour period at the above intersection there was a total of 56 vehicles entering Oakley Street from Grote Street and a total of 23 vehicles exiting Oakley Street turning onto Grote Street.

The above recorded am and pm peak hour traffic volumes are summarised in *Figure B* included as an attachment to this document.

It was forecast in our previous traffic and parking assessment report that the subject development would generate a maximum of 18 vehicle movements during AM and PM peak periods including both entry and exit volumes as summarised in the table *(Table 1)* below.

Table 1: Forecast traffic movements entering and exiting the subject development during peak am and pm weekday periods

	AM peak hour			PM peak hour		
	Entry	Exit	Total	Entry	Exit	Total
Commercial traffic	3	0	3	1	2	3
Residential traffic	3	12	15	10	5	15
Total	6	12	18	11	7	18

The majority of the above forecast peak hour traffic movements are anticipated to occur via Gouger Street. While the above forecast traffic movements are not anticipated to result in capacity issues it should also be noted the existing development on the subject site currently accommodates 23 car parking space and is therefore generating existing traffic movements on the adjoining road network. Hence the actual increase in traffic generated by the subject development would be less than the volumes of traffic identified by *Table 1.*

The forecast increases in traffic movements entering and exiting the intersections of Oakley Street with both Grote Street to the north and Gouger Street /Selby Street to the south are summarised in *Figure A1 and B1* respectively also included as an appendix to this document. These figures identify that the proposed development would result in only very minor increases in the volumes of traffic entering/exiting these intersections. In summary it is identified that there would be:-

- an increase in total of only 12 traffic movements entering / exiting Oakley Street to and from the north via the intersection with Grote Steet in the am peak hour,
- an increase in total of only 6 traffic movements entering / exiting Oakley Street to and from the south via the intersection with Gouger Steet / Selby Street in the am peak hour,
- an increase in total of only 10 traffic movements entering / exiting Oakley Street to and from the north via the intersection with Grote Steet in the pm peak hour, and
- an increase in total of only 8 traffic movements entering / exiting Oakley Street to and from the south via the intersection with Gouger Steet / Selby Street in the pm peak hour.

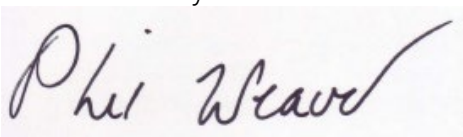
The above forecast traffic volumes would typically be less than the daily variation in traffic movements associated with either of the subject intersections and in my opinion would result in no discernible change to the operation of either intersection.

In relation to the second of the above matters raised in the RFI, namely vertical clearance within the waste collection area, I have been advised by the waste consultant (Colby Phillips Advisory) that a minimum vertical clearance of 3.8 metres would be sufficient to accommodate waste collection vehicles using this area. These vehicles would be the largest vehicles required to access this area and therefore it is considered that a minimum vertical clearance of 3.8 metres in this area would be sufficient to accommodate waste collection on site as previously identified.

In relation to the third of the above matters raised in the RFI, I understand that bicycle parking for visitors and the retail use as per *PO 9.1* shall be accommodated by the proposed development. Whilst I understand that end of trip (EOT) facilities are not currently proposed, I note that the two larger retail tenancies are capable of accommodating such facilities within their footprint if ultimately required by future tenants.

In summary I consider that the various traffic and parking related aspects raised within the RFI from the State Planning Commission have been appropriately addressed.

Yours sincerely



Phil Weaver
Phil Weaver and Associates Pty Ltd

Enc: Figures A / A1 and B/B1

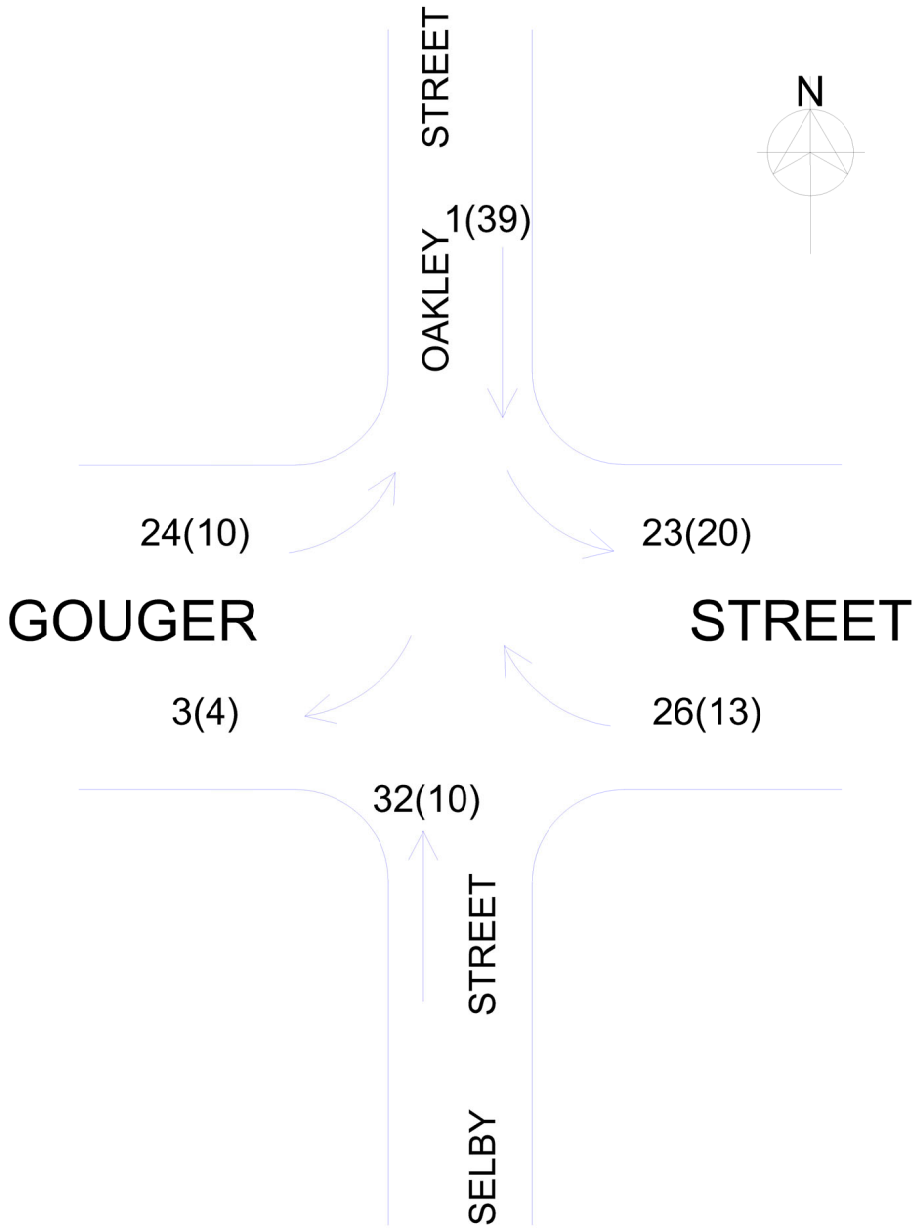


Figure A: AM and PM peak hour traffic counts - Wednesday 27 November 2024

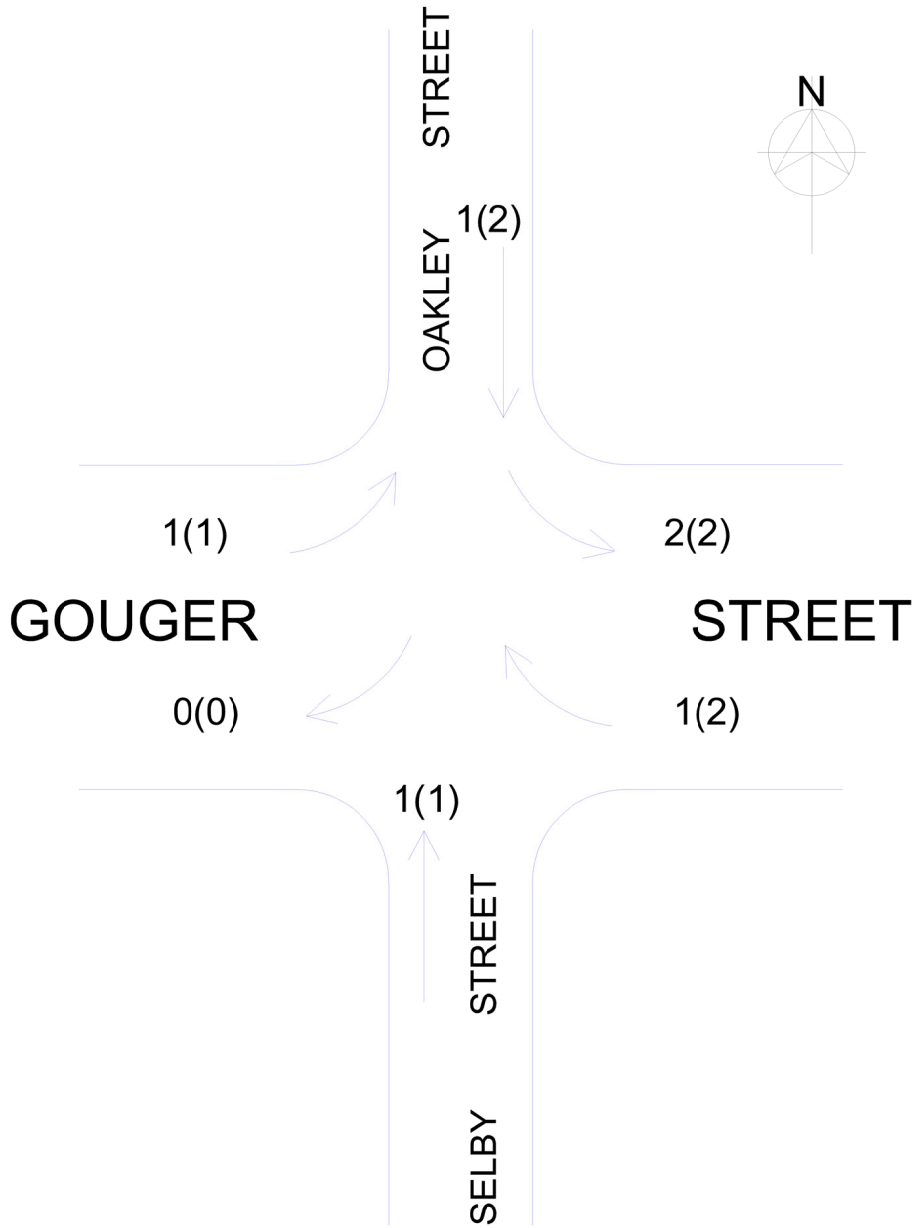


Figure A1: AM and PM peak hour traffic volumes generated by the proposed development

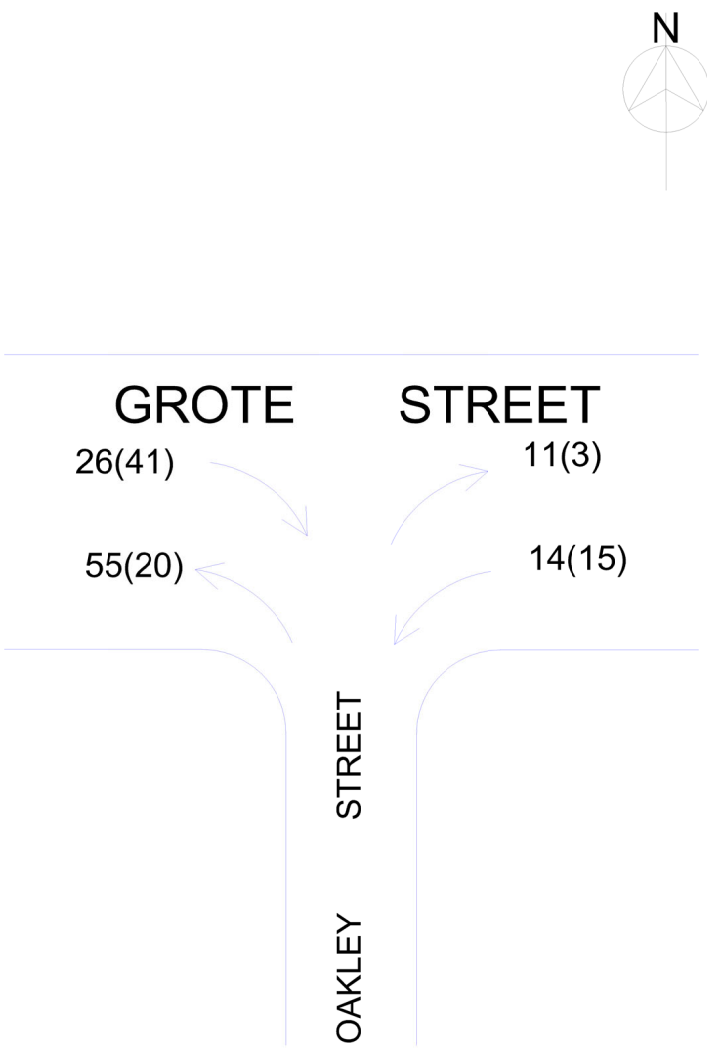


Figure B: AM and PM peak hour traffic counts - Thursday 28 November 2024

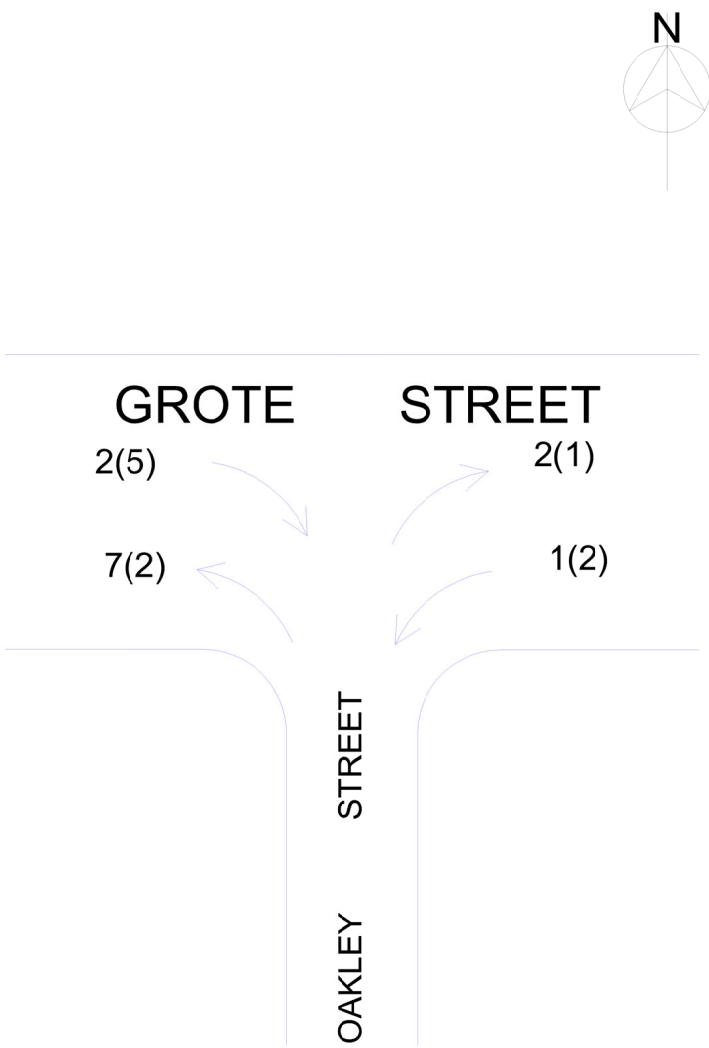


Figure B1: AM and PM peak hour traffic volumes generated by the proposed development