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27 February 2025

Daniel Marotti
Planning Officer
State Planning Commission
Level 10, 83 Pirie Street
Adelaide SA 5000

Submitted via PlanSA portal

Dear Daniel

Response to Agencies Comments - DA 23012013

URPS continues to act for Otello Projects (the applicant). We have been asked to respond to the requests for further information (RFI) and referral comments issued by the City of Unley (Council), the Office for Design and Architecture South Australia (ODASA) and the State Planning Commission (SPC).

This letter contains a formal response to each of the matters raised by the referral bodies.

Response to Council

Stormwater Management

The Stormwater Management Plan developed by P & G Structures Pty Ltd has been updated to rectify the issues raised in Council's letter. Accordingly, the following has been updated:

- The stormwater calculations have been updated to a 10% Annual Exceedance Probability (AEP) pre-development flows.
- The FFL has been amended to 11.32mm.
- The 375mm diameter concrete pipe will be connected as recommended.
- Plan now indicates the location of the stormwater pipe in Irwin Lane.

We are accepting of any Reserved Matter if the information provided is not to the satisfaction of Council.

Traffic and Waste

An updated letter from CIRQA has been submitted alongside this letter to address the traffic concerns raised by Council. The letter includes justifications and updated commentary on the traffic for the proposed development.

Parking Provisions

The plans have been updated to reduce the commercial tenancy floor area which has consequently added an additional 2 car parking spaces. As a result, we note the following:

- The proposed development meets the Code requirements for residential car parking by providing 18 on-site secure spaces for residents.
- The development requires 8 spaces for commercial and visitor use (4 each). The site provides:
 - 4 staff-only spaces (2 inside secure parking, 2 adjacent to the roller door).
 - 5 visitor spaces in the unsecured parking area, exceeding the requirement by 1 space.
- Commercial and residential visitor parking peak at different times (business hours vs. evenings/weekends), ensuring efficient space use.
- The site meets all parking requirements without any reliance on on-street parking.
- Three on-street spaces are available adjacent to the site, with minimal restrictions (as a clearway from 7:30–9:00 AM on weekdays).

The on-site parking achieves Code requirements, and shared parking arrangements align with Performance Outcome 5.1 of Transport, Access & Parking policies.

On-Street Parking

In response to the on-street parking comments, we advise:

- Residents, visitors, and staff of the proposed development will not be eligible for residential parking permits and will be required to adhere to all existing on-street parking restrictions. We accept that residential parking permits will not be issued to residents.
- The development will not rely on any changes to existing on-street parking restrictions along Unley Road or nearby local streets such as Young Street and Clyde Street for accommodating parking needs.

Bicycle Parking

The secure bicycle parking room will have capacity to accommodate the entire bicycle parking requirement, therefore satisfying the bicycle parking requirements of the Code.

In addition, all bicycle parking will be designed and installed in accordance with the Australian Standards AS2890.3:2015.

Loading and Waste Collection

In response to the waste collection, we advise:

- Waste collection will service the site between the advised times listed by the City of Unley Council.
- 10m refuse vehicle turn path plans have been supplied within the CIRQA report to show no obstructions with the 600mm clearance line for waste collection.

Civil Assets & Encroachment

We acknowledge the council's comments regarding the civil works required within the council verge and the encroachment policy. The applicant confirms that the following requirements will be satisfied:

Footpath Paving Compliance

- The applicant will ensure that all footpath paving on Unley Road and Esmond Street is consistent with the 'Unley Road Public Realm Design Guidelines', 2022.
- All alterations to the verge on Unley Road will be carried out in accordance with Council's requirements and to the Council's satisfaction, at the Applicant's full cost. We will refer to the City of Unley website for the necessary forms and applications related to Specification Crossover Opening, Kerb & Gutter, and Footpath Repair.

Vehicular Crossovers/Entries

- All vehicular crossovers and entries will be installed or reinstated to meet council's requirements and satisfaction, at the Applicant's full cost.
- Driveway crossing places will be paved to match the existing footpath and will not be constructed from concrete unless explicitly approved by the council. We will adhere to the specifications outlined in the City of Unley's Driveway Crossover Specifications, as detailed on the Council's website.

Encroachment Permit

- The applicant acknowledges the requirement to obtain a new encroachment permit for the development, in accordance with Council's encroachment policy.
- We will ensure that any encroachments are dealt with in a satisfactory manner, obtaining the necessary authorisations under Section 221 of the Local Government Act 1999 and paying the annual fee to Council as required. For other public places owned by the Council, we will contact the Council's Property and Assets team for further information on obtaining an Encroachment Permit.

We confirm our commitment to adhering to these requirements and look forward to collaborating with the Council to ensure the successful completion of these works.

Landscape Design Plans

In relation to the planting of street trees, any works undertaken on council owned land will only be undertaken via a separate authorisation from council. We are accepting of the recommended Advisory Note.

We acknowledge and support the City of Unley's efforts to mitigate the Urban Heat Island effect and meet the long-term canopy cover target of 31% by 2045. However, we would like to highlight the following points regarding our development and its specific needs:

- The site constraints including building footprint, access requirements, and essential infrastructure placement limit the on-site planting of trees.
- Our commitment to sustainable design ensures that we still support broader environmental objectives.

This is why we have nominated to plant three trees on the verge facing Unley Road. The selection of Jacaranda trees was to align with other tree species along Unley Road to create continuity. We believe there will be sufficient separation from the building and canopies to avoid significant interference as shown by Enzo Caroscio Architecture (RFI Response Trees Along Unley RD, Page 46). This species can be amended in accordance with council's recommendations.

We appreciate the importance of the City of Unley's canopy cover initiative and remain open to exploring collaborative solutions that can align our development goals with the City's environmental targets wherever possible.

Response to ODASA

Built Form and Building Height

The proposal seeks to deliver a high-quality design outcome that justifies the additional height through strong architectural expression, high-quality materiality, and a commitment to sustainability and amenity. In response to the comments:

- **Building Height & Interface Impacts:** While exceeding the envisaged five-storey height limit, the design remains predominantly within the 30-degree building envelope, with only a minor encroachment at levels five and six. An overlooking analysis has been provided to demonstrate limited interface impacts on the adjacent Established Neighbourhood Zone.
- **Built Form & Streetscape Integration:** The two-storey podium is designed to define a clear building base that aligns with the Unley Road streetscape, with stepped setbacks and thinner grid framing on upper levels to reduce visual bulk. The penthouse level's setbacks further minimise perceived height.
- **Environmentally Sustainable Design (ESD) Optimisation:** Sustainability is embedded across all aspects of the development, including high-performance glazing, optimized natural ventilation, rooftop solar PV and water-efficient fixtures and landscaping.

- **Public Realm Contribution:** The development prioritises high-quality materials and architectural detailing to enhance its interface with the public realm.

We acknowledge the potential impact of future adjacent developments and have designed the apartments with dual aspects and a limited number of units per level to enhance natural light, ventilation, and overall residential amenity.

Architectural Expression and Materiality

We acknowledge the opportunity to further refine the grid form to enhance consistency in rhythm and expression. We recognize that material quality and detailing will play a crucial role in achieving the intended architectural outcome.

In response to your recommendations, we will carefully consider the selection and detailing of the precast concrete, infill materials, and cladding to ensure a high-quality finish. Particular attention will be given to grid connections, joints, and soffit treatments to reinforce the architectural rhythm. These elements will be further developed and refined in the next design phase to align with the project's overall vision.

Internal Planning

Regarding the introduction of natural light and outlook to the lift lobbies. We acknowledge the benefits of natural ventilation in enhancing occupant comfort and sustainability.

In response to your recommendation, we have explored design solutions to incorporate natural ventilation into these spaces while ensuring compliance with building performance and safety requirements. This includes operable windows for cross ventilation and louvered openings which complement the architectural intent (Enzo Caroscio Architecture - Sustainability Plan, page 42).

These considerations will be further refined in the next design phase to enhance the overall functionality and user experience of the lift lobbies.

Landscaping

Access to the proposed roof garden for maintenance will be via the car park. Due to the building restraints and privacy this is the only way to facilitate ongoing maintenance while maintaining safety and design integrity.

Regarding the transformer screening, we will confirm the final treatment to ensure it integrates seamlessly with the architectural design of the development while effectively mitigating visual and acoustic impacts.

Environmentally Sustainable Design (ESD)

Thank you for your support of the proposed ESD initiatives. The development aims to integrate a comprehensive sustainability strategy by Nathan Lawry that includes:

- **Building Efficiency:** High-performance glazing, optimized natural ventilation, and low solar absorptance roofing to enhance thermal comfort and energy efficiency.

- **All-Electric Development:** Fully electric systems powered by South Australia's renewable energy transition, with efficient heat pumps and electric cooking for improved indoor air quality.
- **Renewable Energy & Embedded Network:** Rooftop solar PV (minimum 15kW) and an embedded network to maximize renewable energy use and cost savings.
- **Water Efficiency & Landscaping:** High WELS-rated fixtures, drought-tolerant native planting (50% minimum), and irrigation support via hose cocks.
- **Waste & Materials:** Construction waste diversion (90%), use of low-carbon concrete, and sustainable material procurement.
- **Sustainable Transport:** Close proximity to public transport and bike paths, with dedicated bike storage for residents and visitors.

Response to SPC

Building Height

Our response to ODASA's commentary is outlined in the sub-section above.

Density

The proposal aligns with the medium-density intent of the Urban Corridor (Main Street) Zone despite its seven-storey height, for the following reasons:

- The development comprises 15 apartments across seven levels, which results in a low dwelling-per-floor ratio compared to typical high-density developments.
- The apartment count remains within a range that aligns with medium-density outcomes, particularly given the site's location on a major corridor where increased density is anticipated.
- The development prioritizes spacious apartments, offering greater internal amenity compared to high-density configurations that typically feature a higher number of single-aspect units.
- The lower apartment yield allows for better cross-ventilation, natural light, and private open space, features that align more closely with medium-density residential expectations.
- The Urban Corridor (Main Street) Zone anticipates a shift towards increased residential densities, particularly where they integrate with public transport and commercial activity.
- The proposal balances higher residential density with high-quality design and amenity, which aligns with PO 1.5, while ensuring an appropriate interface with surrounding areas.

Overlooking

Views between abutting dwelling balconies on level 1 will be mitigated by 1.8m solid privacy screening as indicated on Level 01 Plan (dated 22/01/2025).

Acoustic Report

An updated acoustic report has been prepared. This report confirms the recommended construction types to achieve attenuation from road noise from Unley Road and surrounds.

At a minimum, these recommendations will be adopted in the construction of the building.

Deep Soil Zone

The proposed development does not meet the quantitative measures in the DPF 13.2 for soft landscaping. However, in relation to the PO, the context of the site and updated plans we consider the amount of soft landscaping acceptable because:

- The site's compact, urban location limits available space for substantial soft landscaping. Unley Road is characterized by dense, mixed-use developments, making soft landscaping less feasible and not critical to maintaining the area's character.
- The development incorporates alternative greening methods such as rooftop gardens and planter boxes to improve the visual outlook of the building.
- The updated design allows the retention of a significant tree (Bottle Brush), which aligns with broader urban sustainability and environmental objectives.

Hours of Operation

The operational hours for the ground floor tenancy are unknown as it is a speculative land use. We request a condition that would maximise the possible operational hours bearing in mind the nearby retail and commercial land uses on Unley Road.

Advertisement

Advertisements/signage does not form part of this application. A separate development application will be lodged for any advertisement/signage as tenancies have not been confirmed.

Conclusion

Should you wish to discuss any of the above, please do not hesitate to contact me on 0403 903 130 or wgormly@urps.com.au.

Yours sincerely



Will Gormly
Senior Consultant