ASSESSMENT REPORT
FOR THE 2ND AMENDMENT TO THE DEVELOPMENT REPORT
PLYMPTON MIXED USE MAJOR DEVELOPMENT
CNR ANZAC HIGHWAY AND MARION ROAD

MARCH 2019

Department of Planning, Transport and Infrastructure

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Government of South Australia
Department of Planning, Transport and Infrastructure

1 Introduction

An assessment has been undertaken of the environmental, social and economic impacts of a proposal by the Palmer Group Pty Ltd (the Proponent) to vary the existing development authorisation for the construction of the Plympton Mixed Use Major development at the corner of Anzac Highway and Marion Road.

Provisional development authorisation was granted on 23 December 2013 pursuant to Section 48(2)(b)(i) of the *Development Act 1993* (The Act), notice of which was given in the South Australian Government Gazette on that same day.

Originally approved as a three (3) stage development, on 12 June 2014 an amendment was approved that altered the development to a four (4) stage development. The West Tower (Stage 1) comprises a five storey residential building with 28 apartments and 25 ground level car parks. This stage has been completed.

Due to variable market conditions and commercial opportunities the proponent sought further changes to the remaining stages of the development, with the submission of an amended Stage 2, which removed the commercial and serviced apartment land uses previously approved for the development. The project reverted back to a three (3) stage development.

These amendments were approved on 21 June 2018. This also included a revised plan of division which amended the boundaries of existing allotments to maintain consistency with the development footprint. No additional allotments were created.

Further commercial negotiations have resulted in a new anchor tenant, which has in turn required a revised development footprint and built form. The current amendment seeks to amend Stage 2, but will still comprise a mixed-use retail and residential development.

Specifically, the amendment seeks to undertake the following works:

- construction of a five-storey residential building with 28 apartments with associated undercroft (at-grade) car park,
- a full line supermarket and speciality retail outlet with on-site loading and services,
- 7 two storey townhouses located on Elizabeth Avenue, and
- 264 car at grade car parks.

The amendment provides for a reduction in supermarket and retail floor area, removal of the first floor car park, removal of supermarket basement storage as previously approved for the development and includes the East Tower apartment block as a stand-alone building, and the addition of two storey townhouses as well as a reconfigured car park.

The proposed amendment has been assessed in accordance with Section 47 of the Act. The amendment was considered to affect the substance of the approved Development Report and therefore underwent a three (3) week public notification process from 21 November to 12 December 2018. Twenty eight (28) public submissions were received.

Comment was also sought from the City of West Torrens, the Department of Planning, Transport and Infrastructure (DPTI), Affordable Housing SA and the Environment Protection Authority (EPA). The Proponent's response to public, agency and Council submissions was received in December 2018.

2 Background

2.1 The Major Development Process

The Plympton Mixed Use Major Development was declared a Major Development by the then Minister for Urban Development and Planning on 24 May 2007. The declaration was varied on 29 January 2009 to include additional land parcels into the subject site.

A development application was subsequently lodged on 2 July 2007 and later varied on 29 January 2009 and 17 May 2013. The major development was the subject of a Development Report. Provisional development authorisation was granted by the Governor on 23 December 2013.

On 12 June 2014 the Minister approved an amendment to vary the number of stages and associated timing of each stage. This allowed the West Tower to proceed as a discrete Stage 1 of the development. The staging remains as previously approved in the previous amendment (Table 1).

On 31 March 2017 the Minister approved a variation to waive the Affordable Housing Land Management Agreement (LMA) for the West Tower as part of Stage 1. On 21 June 2018 the Minister approved a variation (to amend Stage 2) for a revised mixed-use retail and residential development with the commercial and serviced apartment land uses removed.

On 13 November 2018 the Proponent lodged a second amendment to the proposal and this Amended Assessment Report (AAR) has been prepared.

	Original Consent 23 December 2013	**Approved Amendment 12 June 2014**	**Approved Amendment June 2018**	**Status**
Stage 1	West Tower, ground level supermarket with basement and Level 1 car parking, ground level retail tenancies, Level 1 commercial tenancies and the East Tower.	West Tower: five-storey residential building with 28 apartments and 25 ground level car parks	N/A	Constructed
Stage 2	East Tower: serviced apartments	Ground floor supermarket with basement and Level 1 car parking, ground level retail tenancies, Level 1 commercial tenancies and the East Tower, comprising serviced apartments. To be conducted in 2 stages (Stage 2 and 3).	• East Tower: four storey residential building with 28 apartments sitting above a shopping centre (total six stories). • Full supermarket • Speciality retail outlets • On-site loading and services • 365 car parks (combined for residential and retail land uses).	Stage 2 has been revised again and part of this amendment process.
Stage 3	North Tower - 42 apartments	As Above	North Tower – 42 apartments	Commencement timeframe extended until July 2022.
Stage 4	NA	North Tower – 42 apartments	NA – Stage 4 deleted	NA – Stage 4 deleted

Table 1: Staging of Development

2.2 Subject Site

The development site is located on the corner of Anzac Highway and Marion Road, Plympton and incorporates the existing Highway Hotel, associated car parking plus bottle shop/drive through.

The subject land is bound by Elizabeth Avenue to the south, Anzac Highway to the northwest and Marion Road to the northeast. The subject site comprises 12 allotments with a total site area of 18,000m^2.

The subject site is predominantly located within the *Urban Corridor Zone, Policy Area 34 – Boulevard* of the West Torrens Development Plan A portion of the site, comprising a row of four allotments fronting Elizabeth Avenue, are located within the *Residential Zone, Policy Area 18 – Medium Density* as identified in Maps WeTo/12 and 15.

3 Extent of Variation

The proposal was approved as a mixed-use development comprising:

- 108 apartments (including 26 serviced apartments) located in three Towers:
    1. West Tower: freestanding Tower of five levels (under construction)
    2. East Tower: freestanding Tower of five levels
    3. North Tower: six levels above one level of car parking and one level of retail
- A supermarket of 3086m^2 and associated storage and administration offices (mezzanine area of 296m^2).
- Specialty retail shopping tenancies incorporating cafes and restaurants at ground level (1994m^2) and internal pedestrian mall.
- Commercial space (office or similar) on Level 1 (878m^2).
- Provision of car parking (448 parks total), bicycle racks at street level and bike storage.

The amendment seeks to proceed with Stage 2 in a varied form to that approved at 21 June 2018. Specifically, the amendment proposes:

- Removal of retail first floor car park (reduction of 202 car parks).
- A reconfigured at grade car park totalling 264 car parks.
- Removal of retail basement storage.
- A reduction in supermarket floor area - proposed supermarket now 1,739m^2 (previously 3313m^2).
- A reduction in area of specialty shops and reconfiguration from 579m^2 to 365m^2.
- Addition of 7 two storey townhouses on Elizabeth Avenue.
- The East Tower is now a stand-alone 5 storey building comprising 28 apartments and mirrors the completed West Tower.
- In addition 2 x pylon signs – 1 x 10m high sign at the entry to the car park off Anzac Highway, and the other sign 8m high and located 35 metres south of the new vehicular access/egress crossover to Marion Road and wall signage.
- Change in delivery and service vehicle routes which if approved would occur thorough the site.
- Increase in landscaping and provision of ground floor communal space (for East Tower).

The previously approved East Tower had a maximum height of 23.45m. The maximum height of the amended East Tower will be 17.34m, a reduction in height of 6.11m.

A description of the changes to the proposal, against the approved development as at 12 June 2014 is as follows:

Level	**Approved Amendment 12 June 2018**	**Proposed Amendment November 2018**
Retail Complex (Levels B-1)		
Basement	- Removal of basement car parking - Addition of storage under supermarket (982m^2)	- Removal of retail basement storage
Ground	- Reconfiguration and reduction in speciality shops (down 1032m^2 to 962m^2) - Removal of internal mall - Supermarket size increased (up 227m^2 to 3313m^2) - Outdoor dining - Lobby (73m^2) - Public toilets (86m^2) - Bin storage and services area - Car parking (9 spaces) - Bicycle racks (25)	- Reduction in specialty shops (365m^2) – previously 962m^2 - Reduced supermarket – (1703m^2) – previously 3313m^2 - Reconfigured car park - 264 car parks as per reduced development (reduction of 93 spaces) - 22 bicycle parks (7 within the East Tower) - Additional landscaping –communal space adjacent north end of east tower - Overall reduction of 9419m^2 of built form <u>Additional Townhouses</u> - 7 x 2 storey townhouses fronting Elizabeth Avenue + associated garages - Site area = 100.65m2 <u>New Signage</u> - 2 x freestanding pylon signs (8.5m and 10m) + wall signage
Level 1	- Removal of commercial tenancies - Increased car parking: 202 for retail and 20 for apartments partially covered (up 2820m^2 to 6230m^2) - Bicycle racks (25 for apartments) - Lobbies	- N/A as first floor car park removed

East Tower Complex (Levels 2-5)		East Tower - now a separate 5 storey building (Ground & Levels 1-4)
Level 2	7 apartments: - 1 x 1 bedroom/studio (34m^2) - 6 x 2 bedroom (combination of 46m^2, 50m^2 and 53m^2) Outdoor open space (landscaped) 7 apartments 7 apartments 7 apartments	Ground level - -lobby - 27 car parks – service area
Level 3		Levels 1 – 4 - 7 apartments each floor (28 total) - 1 x 1 bedroom/studio (47m^2) – POS = 7.68 - 6 x 2 bedroom (combination of 69m^2, 70m^2 and 77m^2) – POS respectively = 11.4m^2,11.4m^2, 9.2m^2 Storage – located above each car park in the East Tower in the form of a cage (28 cages in total)
Level 4		
Level 5		

Table 2: Summary of Amendment

4 Public Notification

The amendment was considered to affect the substance of the approved Development Report and therefore underwent a three (3) week public notification process from 21 November to the 12 December 2018. Twenty eight (28) representations were received.

In summary, the amended built form proposal was not a concern and generally supported. The primary objection is the recommended closure of the median strip on Marion Road - from Mabel Street to Glengyle Terrace by the Commissioner of Highways.

It is worth noting that the original application (and subsequent changes) have been previously publicly notified in the Advertiser and local Messenger paper, providing opportunity for the community to respond.

The median strip closure was approved as part of the previous applications with the traffic and access recommendations remaining the same, with this specific change outside of the development site and the direct control of the proponent, and mandated to deal with traffic safety matters.

A brief summary of the issues raised is given below.

Issues	***Applicants Response***
▪ *Installation of a continuous median strip on Marion Road that blocks access (right hand turns) to Mabel Street for north bound traffic – and also blocks access (right hand turns) to Elizabeth Avenue for southbound traffic. Concerns that this will limit accessibility and increase travel time.* ▪ *Impacts on visitors and patrons to commercial properties and local electorate office on Marion Road - No assessment or suitable alternatives for traffic have been provided – the median closure is not sited in the subject land and has no direct impact on the proposal.* ▪ *Motorists using the intersection should not be prejudiced for the benefit of the proposed development – there is no reason the current arrangement should not continue after the completed development. - proposes alternatives for the developer* ▪ *Vehicles will have to make U-turns into heavily banked up traffic or travel significant distance to be able to enter our premises in the correct direction – with the*	▪ *The sole issue raised by the representors is the DPTI proposal to restrict right in/right out movements from Mabel Street and Elizabeth Avenue.* *The majority of representors are aware that the Marion Road Traffic Study is underway and it is respectfully suggested that any final decision regarding these road changes be postponed until such time as the Traffic Study is completed. This will enable due consideration to be given to the views of the broader community. The proponent will abide any decision made.* ▪ *The East Tower will be setback 3.0 metres from the Marion Road frontage to facilitate any future road management measures. The main east wall face of the East tower (and associated columns at ground carpark level) are setback 3m from the Marion Road boundary. The balconies of the single bed*

need to traves the traffic lights multiple times. ▪ *Concern that local streets will become congested due to the traffic being pushed west.* ▪ *No changes should be made until the Marion Road Traffic Study 2019 (by DPTI) is completed, with any recommendations taking into consideration the views of the local residents and businesses.* ▪ *Lack of consultation with those affected by the median changes, whilst alternative options need to be more fully explored that do not further restrict local roads.* ▪ *Resources would be better used upgrading the roads to improve commuting – the proposed traffic interventions only creating more problems.* ▪ *Access into the supermarket carpark is limited (egress only).* ▪ *Almost impossible to turn right from Marion Road into Elizabeth Avenue – often the tram causes a bottle neck in the traffic.* ▪ *Proposed changes will affect the residents commuting children to the St Johns school in Elizabeth Avenue.* ▪ *Building setbacks from Marion Road should be 3m due to future road widening.*	*apartments (1 apartment per level) extend 1.8m towards Marion Road (accordingly a 1.2m setback). The last revised approval had the rooftop carpark access ramp with a setback of 2m and the original approval of 21/12/2015 had retail tenancies on the boundary. DPTI SSD have expressed that they have no setback requirement*

Note: The Marion Road Traffic Study is being undertaken by DPTI and is federally funded. Any traffic interventions will likely occur after the proposed development is constructed and the increase in traffic generation from the site reaches a key threshold whereupon safety and efficiency improvements need to be made to the road network. DPTI has investigated all possible alternatives, with the extended median being the safest option. It is recognised that some level of inconvenience will result for local residents and businesses, however given the need to maintain the efficiency of the arterial road network and prevent unsafe vehicle movements or allow additional traffic delays for turning vehicles (during peak periods), such works are required for the benefit of all road users.

5 Assessment of the Main Issues

5.1 Need for the Amendment

The approved development sought the consolidation of an infill site in close proximity to the city and in a strategic location. It has the potential to revitalise the existing neighbourhood centre through increased residential densities and the development of a mix of uses on a major public transport route. This does not change with the proposed Stage 2 amendment.

The amendment has been proposed due to market conditions and commercial opportunities since the previous approval was granted and the need to secure a new anchor tenant. The proponent is now seeking to have these changes formalised.

5.2 Economic Issues

The applicant's Amendment Report (Section 6.11: November 2018) states "In addition to the estimated 72 jobs created during the construction phase, it is estimated that the new scheme proposal would directly contribute to approximately 180 ongoing full-time jobs across the different fields of employment, including retail sales, management, administration, grounds keeping and maintenance and cleaning"

The previously approved scheme had a total construction cost of $56 million which has been revised as follows:
Stage One: $8,000,000
Stage Two: $17,000,000
Stage Three: $13,000,000
Total: $38,000,000

The proposal continues to provide a range of direct and indirect economic benefits. Whilst reduced in size, the amendments will still deliver increases to residential densities, and a new retail tenancy and supermarket which will further enhance and activate the Plympton precinct. The proposal will likely increase public transport patronage and support new investment within the locality

The AAR concludes that the amendment proposal remains of economic importance to the State. The development of the site will set a positive example for future urban regeneration within the locality.

5.3 Land Use

This 2nd amendment is for the construction of a mixed-use building comprising a supermarket, retail tenancy and residential apartments and reconfigured car park.

The removal of the upper level car park and reduction of the supermarket and retail tenancy has meant a smaller building footprint and the provision of at grade car parking. The amendment proposes the east tower residential apartments as a standalone building where previously it was integrated as part of the overall built form. Introduced to this proposal are 7 x two story townhouses fronting Elizabeth Avenue, to the south and the rear of the supermarket. The residential frontage to Elizabeth Avenue is more in keeping with the intent of the Residential Zone and compatible with existing residences.

The AAR concludes that the mix of land uses is acceptable. The proposal remains consistent with the Objective of the Urban Corridor Zone; to accommodate a range of medium and high-density residential land uses and a range of compatible non-residential land uses, orientated towards a high frequency public transport corridor.

5.4 Affordable Housing

The South Australian Housing Association (SAHA) has advised that whilst this amendment reduces the dwelling outcomes from 105 to 63 apartments, the affordable housing quota has still been met by the delivery of affordable housing rental outcomes (National Rental Affordability Scheme (NRAS)) in the Stage 1 West Tower component and as such no further affordable housing is required on this site under the Affordable Housing Policy.

The AAR concludes that the affordable housing requirements have been adequately satisfied.

5.5 Built Form and Appearance

5.5.1 Design

The amended design retains the supermarket in the same location, with the retail tenancy sited between the supermarket and the existing bottle shop along its northern frontage (facing into the car park). The bottle shop has been integrated into the retail complex through the connecting retail tenancy and extended use of canopy. The reduced retail area has meant a reduced building footprint and lesser car parking provision.

The standalone East Tower has a similar footprint to the approved scheme, except the removal of the upper level car park ramp, canopied service area, and small car park which will be sited in closer proximity to both Marion Road and Elizabeth Avenue.

The foremost face of the building is setback 3 metres from the property boundary to Marion Road (previously 7 metres) and 3.8 metres from Elizabeth Avenue (previously approximately 13 metres). The orientation remains the same for the east tower, with all balconies facing Marion Road to the east and across the supermarket roof to the west. The western balconies are sufficiently indented and shaded by the upper levels and side screening. The balcony views to the west have been improved due to the removal of the expansive roof line of the upper level car park (previously approved).

Pedestrian entry to the East Tower is from Elizabeth Avenue. Services will now be accommodated on the western side of the building. The ground level car park will be obscured from view by laser cut Corten steel feature fencing, landscaping and vegetated ledges at the first level.

The design is similar to the previous scheme. However, it is considered that the architectural proportions and materiality, which feature vertical landscaping and screening (of the car parking area), provide an enhanced outcome and streetscape amenity than the previous iteration. Under the previously approved design the precinct was impacted by an elevated ramp to an upper level, open-air car park. The amended design provides sufficient visual interest at both a pedestrian level and when viewed from its surrounds.

There are provisions in the Urban Corridor Zone that encourage the inclusion of a podium. Whilst the amended design does not include a podium, the removal of the vehicle ramp is viewed positively, with the resultant built form providing an enhanced level of interest to the street. The East Tower meets the zone requirements for the setbacks from primary and secondary road frontages.

The design of the 7 x two storey townhouses fronting Elizabeth Avenue is typical of many contemporary townhouses currently. There is a small front yard with veranda over the entrance. The kitchen/dining/living areas occupy the ground level, a courtyard area and veranda to the rear are enclosed by the supermarket wall to the rear. The upper level comprises 2 x bedrooms, bathroom and balcony. The balcony faces Elizabeth Avenue.

External materials and finishes complement that of the East Tower. The proposal presents an improved visual amenity with respect to the residential streetscape on Elizabeth Avenue, where previously there was an expansive supermarket wall facing the street.

The minimum setback for the townhouses in the Residential Zone is 3 metres. The townhouses are setback 2.9m (property boundary to building face). The proposal generally meets a number of provisions for site coverage, building height and dwelling type. There are minor variations around policy provisions for dwelling width and site area, which are considered acceptable.

Perspectives of the supermarket, retail area and bottleshop show an adequate level of activation to satisfactorily address the internal frontage of the site. The entrance areas and canopies are acceptable given the shelter they provide and the opportunity for outdoor activity.

As part of the amendment, external signage has now been incorporated on the proposed plans.

Two freestanding pylon signs have been proposed within the boundaries of the site, one at the Anzac Highway entry (10m in height), just before the existing bottle shop, and the other at the Marion Road entrance (8.5m in height) to the car park. Both signs will be constructed of powder coated steel columns with illuminated panels between showing tenancy information.

The signs will not be illuminated with LED or LCD as per the relevant condition. Further panel signage is shown attached to the supermarket wall and plant screening of the amenities tower at the eastern and northern side. The panel signage on the plant screen will also be illuminated. Given the particular supermarket tenant, the signage proposed is typical of the brand. The pylon signage is standard for this type of complex and not likely to detract from the amenity of the locality.

The AAR concludes that the amended proposal, whilst different from the previously approved scheme in that it has a reduced footprint, separate apartment tower and additional townhouses, is a positive architectural outcome for both the Marion Road and Elizabeth Avenue frontages, and an improvement on the previously approved proposal.

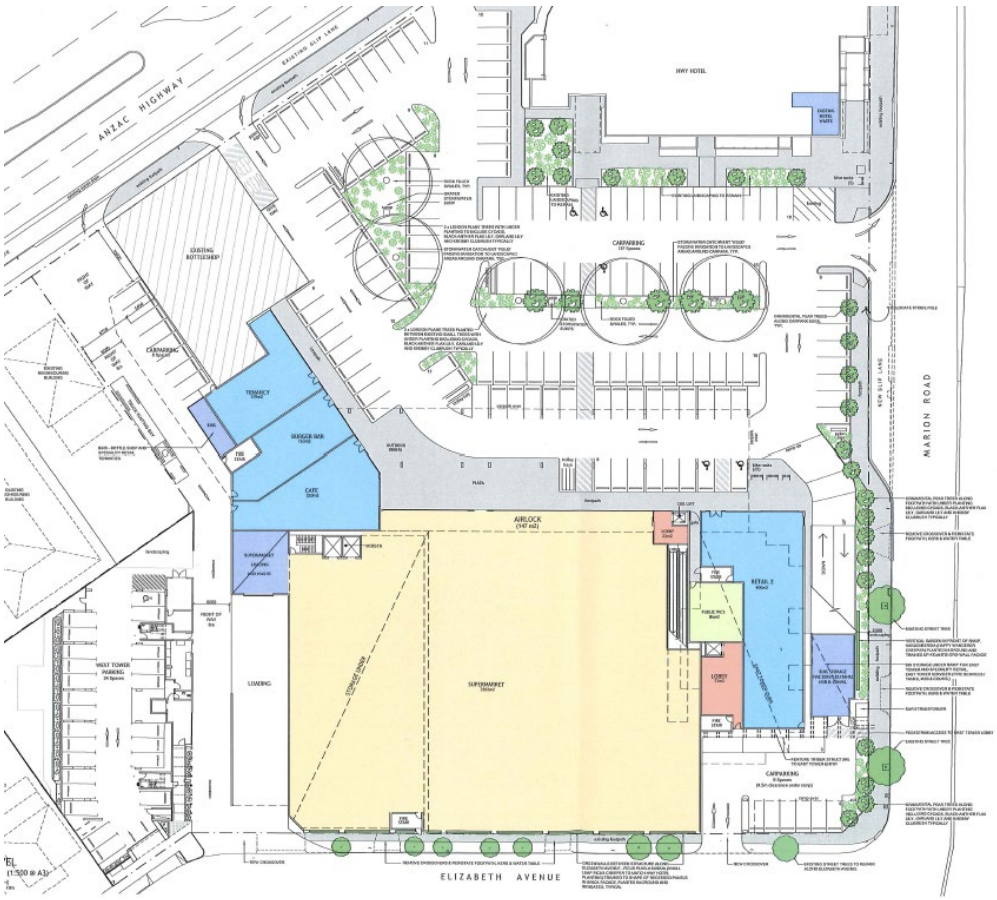

Image 1: Approved Site Plan - Ground Floor (June 2018)

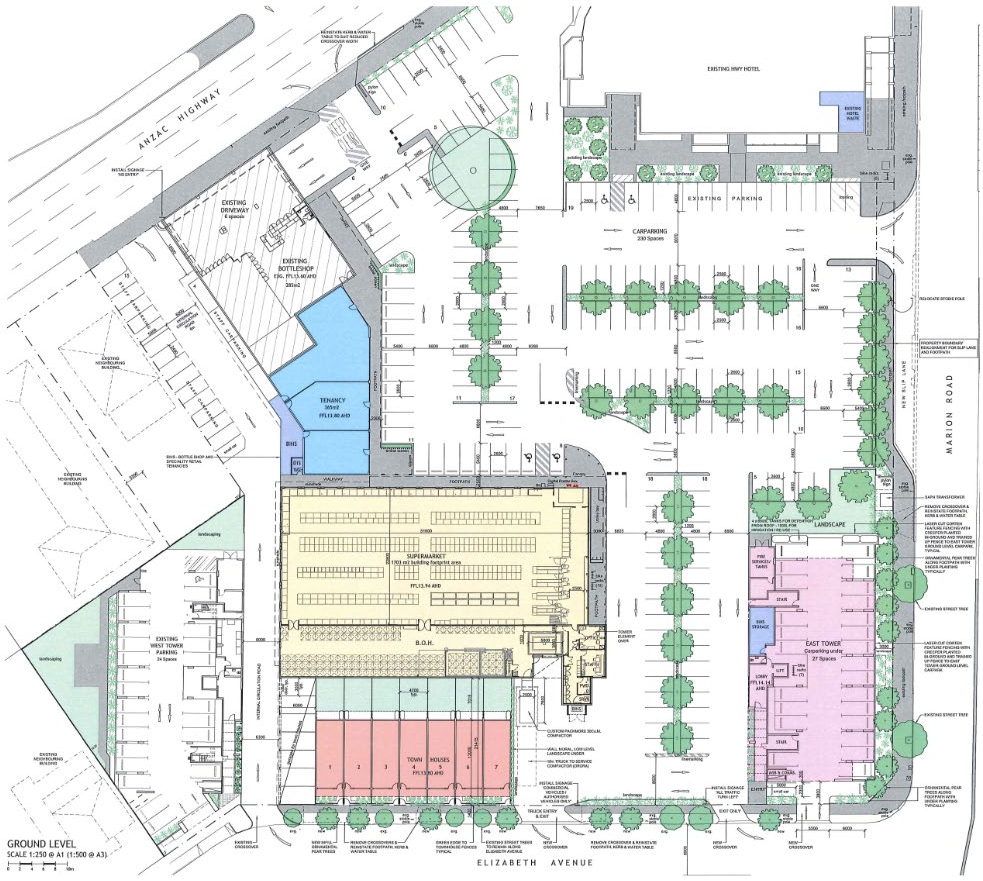

Image 2: Proposed Site Plan (November 2018)

Image 3: Approved eastern (Marion Road) frontage schematic (June 2018)

Image 4: Proposed eastern (Marion Road) frontage schematic (November 2018)

5.5.2 Height

At a height of 31.74 AHD (17.6m), the amended East Tower is 5.6 metres lower than the previously approved scheme at 37.35 AHD. The East tower reflects the height of the recently constructed West Tower.

The East Tower is also within the eight (8) storeys or 32.5m maximum height provision for the *Urban Corridor Zone, Policy Area 34 – Boulevard*, within which the majority of the East Tower is located. It is noted that the height limit within the adjacent *Residential Zone, Policy Area 18 – Medium Density* is three (3) storeys or 12.5m. The height of the East Tower is considered to be acceptable, given its adjacency to Marion Road and the ambition of the 30-Year Plan to increase densities in this location.

With the reduction in the overall building footprint and the separation of the East Tower from the retail complex, the amended Stage 2 development achieves a complementary scale to existing and future development. The dominant features of the amendment when viewed from a distance would be the 2 residential towers. However, given the height provisions for the Urban Corridor Zone, it is anticipated that 5 storey apartment towers will feature more prominently, as lower scale dwelling sites are progressively amalgamated and redeveloped in the future.

Given the reduction in height, the Airports Authority requirements are unchanged, with confirmation provided that the building does not intrude into the Obstacle Limitation Surface for the airport which is 48.5m AHD. However, the use of cranes for construction will require a separate approval. An Advisory Note to this effect is already contained as part of the existing provisional consent.

The AAR concludes that the amended design is of an appropriate bulk and height for the locality, is a reflection of the completed neighbouring West Tower and sits comfortably within the maximum height provisions for the Urban Corridor Zone.

Image 5: Proposed elevations of Stage 2 – East tower maximum 31.74m AHD (November 2018)

5.5.3 Apartment and Townhouses Layout and Amenity

The residential apartments show four typical apartment layouts (1 -2 bedrooms) and has 7 apartments on each level (28 in total). This design is similar to the previously approved scheme.

The proposed studio (47m^2) is within the prescribed minimum size of 37m^2. The two-bedroom apartment sizes range from 69m^2- 77m^2 dependent on type. Two of the types are slightly under the 75m^2 required by the Development Plan. This is considered to be acceptable as the difference is minimal, and provides for a range of housing types, with sufficient access to natural light and ventilation to each apartment. Cross ventilation would only be effective on the end apartments, typical of other multi-storey configurations.

The large communal area of open space at Level 1 on the western façade of the East Tower has been removed. In its place a fenced off garden area (north of the East Tower and directly accessible) has been provided for the use of the residents.

The apartment's balcony space provides a certain percentage of the private open space (POS). Some of the POS falls short of the prescribed requirements under the Development Plan, whilst the positioning of air conditioning units also reduces the amount of useable space.

Taken together, the communal and private open space arrangements are considered acceptable. It appears there may be oblique views from Studio apartment 3 into the adjacent apartment balconies on all levels, rather than direct views, with the extent of overlooking minimised. These balconies are framed with vertical timber battens that limit any potential loss of privacy.

Storage will be provided in the form of a cage located above each car park in the East Tower. Given there is only 27 car parks and 28 apartments, one extra storage unit will need to be provided within the ground floor. This can be provided if required.

The stairwells appear to have access to natural light, however the internal corridor will require some form of lighting given its length, which is similar to other developments with apartments that are accessible from a central hallway

Each of the Elizabeth Street townhouses is sited on 100.65m^2 with frontage widths of 4.7m. The local Development plan seeks site areas and widths of 150m^{2}and 5 metres respectively. Dwellings constituting affordable housing can have a lesser site area (100m^2). Private open space is approximately 30m^2 and enclosed to the rear by the supermarket wall which has a height of 6.3 metres.

The visual amenity of the private open space is diminished by the expanse of supermarket wall at the rear of each townhouse site. However, this wall also offers a level of enclosure that is both private and accessible, with the extent of overshadowing limited by the adjoining building's height. Internal stairwells have the benefit of skylights to improve amenity.

The AAR concludes that both the internal floor plans for the East Tower and the 7 Townhouses are generally consistent with the relevant Development Plan provisions and will provide an amenable living environment for its residents. Solar access to the majority of outdoor and indoor spaces has been maximized.

5.5.4 Public Realm

The only proposed entrance to the supermarket and retail tenancies is from the main car park area between the proposed development and the existing Highway Hotel. Where previously there was a large canopied area encompassing a portion of car parking, this amendment proposes a narrower steel framed canopy which protrudes over the tenancy frontage and extends to the bottle shop frontage providing pedestrian shelter. There is also another narrow canopy surrounding the supermarket on the northern/eastern facades. The potential for outdoor dining remains, dependent on tenancy decisions. The proposal allows for an activated public realm along this frontage.

There are no direct pedestrian linkages from Anzac Highway and/or Marion Road to the retail area. There is no dedicated pedestrian link from the supermarket through to the existing Highway Hotel as per a previous amendment. Whilst not ideal, the amendment does not change the footprint or curtilage of the North Tower (which is to replace the existing bottle shop under Stage 3), with any reduction to *direct* pedestrian connectivity being for a temporary period (or until such time as the project is completed). In addition, the revised carpark layout is considered to be an improvement, with lower traffic speeds providing a safe and efficient shared use space for both vehicles and pedestrians.

Different to the approved schemes, the amended proposal provides access to the supermarket from Elizabeth Avenue that traverses the car parking/loading area until it reaches the eastern footpath alongside the supermarket. Importantly a walkway has been provided between the supermarket and the proposed tenancy that is easily accessible for residents of the West Tower and the existing residential community to the south and west of the project through the laneway. The one way access lane and the improved separation between the supermarket and the East Tower makes the site more permeable for pedestrians to access the development.

The existing pedestrian entry to the bottle shop has been relocated so that it is accessible and connected by the pathway fronting the retail/supermarket instead of through the main driveway as it was previously, which is considered a positive feature.

The landscaping in the public realm is more than adequate, with a number of trees within the car parking area and additional plantings on the Marion Road and Elizabeth Street frontages.

The AAR concludes that the public realm response is satisfactory, and an improvement on the previous amendment, providing greater permeability and access. Traffic devices are recommended within the laneway and car park to reflect pedestrian use of the shared space.

5.5.5 Landscaping

The amended proposal incorporates several landscaping elements including:

- Vertical gardens to the northern and southern walls of the East Tower, screening plants and a Gro-wall façade to the townhouse eastern wall.
- Balcony planters over balustrades.
- Landscaped communal outdoor space for the apartments (abutting the northern end – 154m^2).
- Roadside plantings along Marion Road to the corner of Elizabeth Avenue, including trees with a variety of underplantings within the garden beds.
- Passive irrigation to car park garden beds.
- Plantings in the main car park, including trees and dryland garden beds.
- Retention of identified street trees on Marion Road and Elizabeth Avenue.

The use of green walls and laser cut Corten steel fencing elements are supported given the softening effect created on the more visually dominant *streetscape* elements, such as the East Tower car park and its frontage to Marion Road. The proposed landscaping is considered to be an improvement to the visual amenity and will contribute positively to the streetscape.

The green wall alongside the loading dock on Elizabeth Avenue also provides visual relief, particularly to those with direct views, or interact with this element of the project.

The success of the green walls will rely on appropriate access, maintenance and irrigation requirements being met. As per the previous amendment, accessibility to the higher locations for maintenance would be via a cherry picker, with initial inspections at three monthly intervals, and then twice yearly. All green wall planters will be irrigated and vegetated with a species of creeper that is able to survive sun, wind and heat loading.

Stormwater catchment utilising passive irrigation will be utilised to channel surface water to irrigate plants and reduce the amount of stormwater runoff.

It is likely that three (3) street trees will be removed as part of the alterations to Marion Road and three (3) trees on Elizabeth Avenue. The proponent will replace these in consultation with the Council.

The landscaping scheme complements the overall development with perimeter plantings to provide visual interest. Whilst this amendment removes the first level communal outdoor garden, a similarly accessible and landscaped area is provided for residential occupiers at the ground level.

The AAR concludes that the proposed landscaping makes a positive contribution to the public realm, with plantings proposed within the carparking areas, green walls to soften the appearance of outdoor loading areas and a communal garden area for residents of the East Tower.

5.5.6 Crime Prevention through Environmental Design (CPTED)

The Amendment to the Development Report (November 2018) acknowledges that recognised CPTED principles will be adopted throughout the development, consistent with the approved scheme. In addition to existing carpark surveillance, it is also anticipated that the end user of the supermarket tenancy will provide further surveillance and security monitoring.

It is also noted that the western and northern orientation of the apartments will afford opportunities for natural surveillance due to views from the upper level balconies. A similar outlook is afforded from the upper levels of the West Tower to the rear service laneway.

Secure car parking is provided for in the East Tower, with direct access to the apartments above.

There are clear sightlines from the supermarket entrance through the walkway and across the retail frontage/supermarket. There will need to be appropriate after-hours lighting that cover the walkway and the rear laneway for safety.

The AAR concludes that the approach to CPTED is acceptable, as there is sufficient permeability to the street from the upper level balconies and windows to provide adequate passive surveillance. A condition is recommended regarding lighting of the walkway and laneway.

5.6 Environmental Issues

5.6.1 Building Sustainability

The orientation of the East Tower results in the majority of windows and all private open spaces facing either east or west. This is contrary to the Development Plan provisions which seek that open spaces and main activity areas have a northern orientation to take advantage of winter sunlight.

The building energy efficiency requirements will need to meet Part J of the Building Code of Australia. The Proponent has advised that apartments will be designed to achieve an individual 5 star energy efficiency (AccuRate) rating and average 6 star energy efficiency collectively. Additional relief from the western summer sun will be provided by building overhangs, sunshades and balconies.

The design of the development does not preclude the installation of solar PV systems given the roof areas available (and ability to further harvest rainwater for reuse). A Building Sustainability Plan has been retained as a reserved matter to allow for the incorporation of additional water and energy efficiency features into the development.

5.6.2 Noise and Air Quality

The residential apartments in the East Tower are oriented east-west and therefore many of the dwellings will face Marion Road. This is consistent with previously approved schemes.

The applicant's acoustic consultant (Sonus) has confirmed the proposed variation will incorporate double glazed windows in the East Tower, consistent with what is being constructed in the West Tower, where higher acoustic performance is required.

With the introduction of the townhouses (a more sensitive land use) and their location adjacent the supermarket, a 3m-high acoustic barrier is proposed at the supermarket loading dock edge to mitigate noise impacts. The proponent proposes rendered hollowcore blockwork with a painted mural for visual relief.

Both the East Tower and townhouses will be constructed using suitable attenuation measures (such as Hebel construction, as per the Sonus Report dated December 2018) to mitigate potential adverse noise sources that may impact on residential occupiers.

The development will need to comply with the requirements of the Ministers Specification SA 78B for the control of internal/external sound (February 2013), as the subject site is located within the Noise and Air Emissions Overlay Maps in the Development Plan. This is in addition to any requirements of the National Construction Code. A new condition to this effect has been included.

The proponent proposes delivery hours for the retail uses to be unrestricted, although the current understanding is the supermarket will not trade before 7am or after 10pm. Waste collection will be limited to the hours between 7am and 7pm and 9am and 7pm on a Sunday or Public Holiday. Delivery and loading procedures to minimise noise impacts, such as turning off refrigeration units and reversing beepers, will be implemented by the supermarket operator.

5.6.3 Stormwater Management

The proponent has provided an updated Stormwater Management Plan. The Environment Protection Authority (EPA) has reviewed the plan and found it acceptable in terms of water quality. The West Torrens Council has sought further information regarding the harvesting, collection and reuse of stormwater, water quality improvement, water sensitive urban design and detention.

Further information is required for the justification of the 1000 litre stormwater reuse tank for the East Tower given a 20000 litre tank was nominated for the West Tower. Council has also recommended site and surrounding survey information to provide suitability for the Finished Floor Levels (FFFLs) which should typically be established a minimum of 350mm above the adjacent public street water table level.

An existing Reserved Matter requires the Proponent to prepare a final Stormwater Management Plan to the reasonable satisfaction of Council and EPA. Stormwater management must also be addressed in the Construction Environmental Management Plan (CEMP), which must also be provided before the commencement of Stage 2.

5.6.4 Waste Management

Council has raised concerns regarding the applicant's report (refer RR Commercial Consultants), which has provided insufficient information regarding waste storage location and distribution and servicing over the site to allow for the Council to make a reasonable assessment.

These concerns were focused on the waste location access and servicing arrangements. There appears to be potential conflict with the carpark access point at Marion Road and the location of the hotel waste collection point. It is expected that such movements will be undertaken outside of peak periods associated with the retail/hotel car park. Refuse collection for the residential apartments will be undertaken via the adjacent parking aisle.

In any event, an existing Reserved Matter requires the proponent to prepare a final Waste Management Plan to the reasonable satisfaction to Council, EPA and Zero Waste SA. Further consultation will therefore be required with City of West Torrens in order to address the outstanding concerns and satisfy this condition prior to the commencement of Stage 2.

The EPA has reviewed the construction waste management plan provided by the proponent and contained in Appendix C2 of the proponents Amendment Report Stage 2 November 2018 and is satisfied with its content.

5.6.5 Site Contamination

The original assessment for the development recognised the history of commercial/retail land uses on the subject site. Recent site assessments undertaken on the site have identified the existence of site contamination affecting groundwater, which includes volatile hydrocarbon compounds.

The EPA requires that a Site Contamination Audit be prepared by an accredited auditor to demonstrate that the subject site is suitable for the more sensitive uses proposed in Stage 2. This is

consistent with the Development Plan polices which seek that contaminated land be assessed and remediated as necessary to ensure it is safe and suitable for the proposed use.

An existing Reserved Matter requires the Proponent to prepare a Construction Environmental Management and Monitoring Plan (CEMMP) to the reasonable satisfaction of the EPA and Council for each stage of development. The EPA has reviewed the plan and is reasonably satisfied with the content, with the exception of the site contamination section.

The EPA has had discussions with the proponent about potential site contamination and as a result the proponent is currently preparing a site contamination audit for the site. The EPA will need to be satisfied with the outcomes of the audit, and any relevant remediation management plans, in order to satisfy the CEMP Reserved Matter.

The AAR concludes that waste and stormwater management can be appropriately managed through the CEMP and other Reserved Matters and Conditions. The amendment is not expected to increase the magnitude of noise and/or air impacts over and above the approved scheme.

Additional sustainability features can be considered during the detailed design phase with the requirement to provide a Building Sustainability Plan prior to the construction of the development, which can also address the further capture and reuse of stormwater on the site.

Further investigations and documentation is required by the EPA in relation to site contamination. The proponent has commenced a site contamination audit to ensure that the subject site is suitable for its intended use.

5.7 Interface between Land Uses

The subject adjoins the Residential Zone at Elizabeth Street to the south. The properties located on the southern side of Elizabeth Avenue consist of two residential unit blocks fronting an internal driveway and the South Adelaide Christadelphian Hall. There are no dwellings that directly face the Stage 2 development.

The addition of the townhouses fronting Elizabeth Avenue help to obscure the external wall of the supermarket and provide a residential face to the street. This is an improvement on the previous scheme, where a larger supermarket backed onto Elizabeth Avenue.

Delivery hours will be unrestricted, so any potential noise from this activity could impact on the townhouses closest to the supermarket. The townhouses on Elizabeth Avenue have been acoustically designed to protect their residential amenity (See previous discussion).

5.7.1 Visual Amenity

The amended design reduces the height for the East Tower with the tower reflecting the height of the already constructed West Tower. When viewed from the adjacent Residential Zone there is a synergy in the proportions and continuity in the overall design, providing an improved visual aspect than the previous scheme.

The intensified landscaping and feature laser cut fencing provided along Marion Road, and the landscaping along the Elizabeth Avenue frontage will help to soften the appearance of the development. The different types of landscaping are supported.

5.7.2 Overlooking

Any overlooking impacts are expected to be similar to previous schemes. The amended East Tower is oriented with the majority of residential apartment windows and all private open space, facing east and west away from Elizabeth Avenue.

5.7.3 Overshadowing

The East Tower is lower in height than the previous approved amendment, with its setback reduced to 3.8 metres where previously it was approximately 13 metres. There will be some overshadowing during the winter solstice, which would impact on the units directly across the road from the East Tower on Elizabeth Avenue. The northern portion of the units would be affected at different times of the day. However, it would appear that both units would still have access to at least 3 hours of direct sunlight.

The adjacent Church building would be affected at around 9.00am on the winter solstice. The extent of impact would then lessen, with no overshadowing of the adjoining dwellings or church from the proposed development during the summer months. Overall, the overshadowing impacts of the amended proposal associated with the East Tower are less than that of the approved scheme.

However, the new townhouses are affected due to the height of the supermarket wall that backs onto their rear yards. The yards will be completely in shadow (during the winter solstice) and partially in shadow all day during the spring solstice but will progressively have solar access throughout the rest of the year. This is not ideal, but due to the orientation and location of the townhouses it is largely unavoidable (unless a complete redesign of the proposed development is undertaken). The living areas are south facing and will not be affected by overshadowing from adjoining properties and will have solar access during the afternoon.

The AAR concludes that the visual amenity of Elizabeth Avenue is not unduly affected by the development, with the addition of a townhouse component consistent with its residential character and immediate interface with the residences in the immediate locality. There are no additional overlooking impacts as a result of the proposed amendment, whilst the reduced height of the East Tower and closer setback to Marion Road has reduced the extent of overshadowing to the adjacent Residential Zone to the south. It is noted, however, that the private open space of each townhouse will be in complete shadow during the winter solstice, which is not ideal. The restrictions to sunlight in this case are due to their location and orientation, as well as the compact nature of the site and the proximity of the supermarket to the townhouses. Overall, the inclusion of the townhouses is viewed positively, both in terms of affordability and housing mix.

5.8 Traffic, Access and Car Parking

5.8.1 Access

The amended plans alter the traffic access arrangement from the previous approved scheme due to the retention of the drive-through bottle shop on Anzac Highway:

- The Anzac Highway service entry to the rear of the retail tenancies and supermarket is retained, however it is now proposed as an exit only onto Anzac Highway, with access from Elizabeth Avenue and the bottle shop drive through.
- The East Tower access from Elizabeth Avenue has been moved closer to Marion Road.
- There is a new two-way access point to the loading dock specifically for the supermarket.
- An exit only access point is now provided from the car park to Elizabeth Avenue.
- The Marion Road two-way access point to the car park remains unchanged.
- The Anzac Highway two-way access point to the car park is unchanged.

Council and DPTI reviewed the plans and raised a number of issues, mostly in relation to site access, traffic movements and circulation. These matters are outlined below.

(a) Laneway and townhouse garaging

Both DPTI and Council raised concerns with the safety aspects of reversing vehicles from the garages associated with the townhouses into the service laneway due to a lack of adequate sight lines. The traffic consultants (CIRQA) for the proponent consider the location of the garages immediately adjacent the edge of a lane way is common place and a standard design approach for dwelling access via laneways.

The nature of the laneway configuration is such that drivers will typically position their vehicle centrally, which allows for adequate sight distance and setback provisions, and provide sufficient warning if a vehicle is leaving the site. The laneway is one-way and wider than the minimum requirement, and pedestrian sight lines are not impacted. DPTI recommended the service lane flow south to north and this was adopted by the proponent.

(b) East Tower and resident access

Both DPTI and Council considered the impacts of the proximity of the East Tower access to Marion Road would mean that access is likely to be obstructed frequently by traffic queuing to exit to Marion Road from Elizabeth Avenue during the busier periods. A vehicle turning right into the East Tower car park from Elizabeth Avenue could in peak periods delay incoming traffic from Marion Road.

CIRQA has reviewed this issue, and found that the number of movements associated with the East Tower will be low (14 peak hour movements), with not all from Marion Road (given the Marion Road treatments will restrict turns into Elizabeth Avenue to left in only), and as such the low number of right in movements (< 5 peak hour trips) should have a negligible impact on traffic conditions on Elizabeth Avenue.

The access location will be compliant in its setback distance from Elizabeth Avenue. A 6 metre separation from the corner will be provided to allow a queue of up to three vehicles for those waiting to turn from Elizabeth Avenue to Marion Road. This will provide approximately 17 metres between the ingress lane of the access and the closest traffic lane on Marion Road.

(c) Bottle Shop access

DPTI previously recommended that the two-way access near the Bottle Shop should be ingress only, to avoid potential vehicle conflict associated with the drive through. Further modification would be required to the eastern access of Anzac Highway if this was to occur.

CIRQA considered the requirement to alter the western access as unnecessarily onerous, as the existing access point and bottle shop ingress lanes have operated without conflict for some time. It was accepted that additional volumes will be distributed to the egress, and CIRQA have proposed adjustments to the existing layout including a simplified delineation and increased queuing provisions. This is supported by DPTI with the existing review period requirement to remain.

(d) Bus stop relocation

This will be dealt with as a condition of approval.

(e) Marion Road carpark access

A potential conflict point was identified with parking spaces located in close proximity to the Marion Road access. CIRQA consider these spaces could be designated for staff use only. Such an arrangement would minimise turnover rates and the overall risk of any potential conflict. Similar provisions have been accepted by DPTI Safety Services Division (SSD) for other developments. The further refinement of this access point can be addressed through the provision of a final layout plan.

(f) Deliveries and truck movements

Council considers reversing movements of large service trucks and articulated vehicles into the supermarket loading dock and service area have the potential to come into conflict with customer traffic and block access to the eastern-most aisle-way adjacent to the East Tower, a main exit for traffic to Elizabeth Street and Marion Road.

The supermarket tenancy has been amended to incorporate deliveries and waste collection vehicle access through the middle of the site with entry from both Anzac Highway and Elizabeth Avenue. Council recommended that the area in question be closed off to customer traffic, whereas DPTI has sought the relocation of the loading dock to its previously approved location.

CIRQA states in the response document (dated 13 December 2018) that commercial vehicle access to the supermarket is available via Elizabeth Avenue. This allows for the direct entry of commercial vehicles to the loading area and could be sign-posted for commercial vehicle/authorised vehicles only. The previous proposal accommodated only vehicle egress to Elizabeth Avenue.

The supermarket's traffic consultant (separate to CIRQA) has also provided a turn path diagram that indicates that the reversing manoeuvre into the new loading dock will work and that commercial vehicle access from Elizabeth Avenue could be accommodated with minimal impacts.

The number of delivery movements would be very low (i.e. less than 5 movements per day). CIRQA states that this arrangement would also reduce the 'mixing' of domestic/light vehicles and commercial vehicles within the primary car park and is therefore considered a positive outcome.

The site has been designed to accommodate a 13.8m semi-trailer (the largest vehicle anticipated) for deliveries on a 24-hour basis and 11m long rigid trucks for refuse collection for both the retail use and East Tower. The amended supermarket loading dock can only accommodate one (1) semi-trailer at a time – noting again the low number of daily movements.

Council has disputed the adequacy of the aisle width alongside the East Tower (western side of the building). However, this width is in accordance with the relevant Australian Standard for vehicles manoeuvring and exiting the car park (6.6m).

(g) Other matters

Council notes the 'replacement' road reserve to accommodate the deviated footpath on Marion Road was to have the same width. The revised plan appears to show a narrower public verge from 2.8m to 3.4m. The proponent has advised that the design meets the requirements of Reserve Matter *(e) (vi) Disability Discrimination Act 1992* (DDA) compliant footpaths. Bicycle parking is located on the eastern side of the supermarket building. These parks are not directly adjacent the supermarket entrance, but are readily accessible and will not interfere with pedestrian movements along the retail frontage.

5.8.2 Car Parking

The approved Stage 2 amendment provided 357 car parking spaces and 42 bicycle parking spaces, which exceeded the Development Plan requirements. Due the reduction in retail floor areas, there is also a reduced demand for on-site carparks with 264 car parks being provided. The proposal will exceed the minimum requirements identified in the Development Plan (including consideration of the existing hotel and bottle shop uses). Refer to the table below.

Table 1 – Minimum parking requirement associated with the amendment as per Development Plan

Hotel and bottleshop	as per previous assessments		144
Retail/Supermarket (non-residential)	2068m^2	3 sp. per 100 m^2	62
One Bedroom Apartments	4	0.75 per dwelling	3
Two-Bedroom Apartments	24	1.0 per dwelling	24
Townhouses – two bedroom	7 townhouses	1.0 per dwelling	7
			240 required

The amendment includes the provision of 27 secure car parks for use by the 28 residential apartments. As stated by the proponent, this doesn't preclude apartment parking and visitor parking in the general parking areas. The proponent also considers that proximity to public transport will result in less demand for dedicated car parking by residential occupiers of the apartments.

CIRQA confirms that any parking requirement for the northern tower (Stage 3) would be assessed and designed as part of any future application.

Twenty two (22) bicycle parks have been proposed to service the retail areas, whilst townhouses have the capacity to store bicycles within the garage areas or within the apartments.

Table 2 – Bicycle parking requirements based on the Development Plan

Retail(shop)	2353m^2 (includes bottle shop)	1 sp. per 300 m^2	8
Customer	2353m^2	1 sp. per 600 m^2	4
Residents	28	1 per 4 dwellings	7
Visitor	28	1 per 10 dwellings	3
			22 required

This AAR concludes that the amendments to the design and layout should not give rise to undue safety or efficiency issues with the existing road network or internal vehicle movements. A reduction in retail floor areas and carparking numbers has further reduced the potential for these issues, whilst a post-operational review and relevant conditions of approval will ensure the project is developed appropriately.

Given the ready access to public transport options, the differing hours of operation for the Hotel and the shopping centre, as well as differing peak periods, the overall provision of car parking is satisfactory. All carparks, manoeuvring areas and access arrangements would need to comply with the relevant Australian Standards. The bicycle parking arrangements are also satisfactory.

6 Conclusion

The Plympton Mixed Use Major Development was previously granted an authorisation as the proposal was considered to be of an appropriate size, scale and quality commensurate with its locality.

The 2nd amended scheme for Stage 2 does not alter the broad intent of the approved application. The reduced footprint and separation of the residential use from the retail use is supported and provides for a more logical arrangement of land uses on the site.

The amended development proposal retains a mix of residential and retail land uses that are considered appropriate for the subject site and the objectives of the Urban Corridor Zone within the Development Plan. The reduction in the supermarket footprint and lower height has allowed for the additional townhouses.

The amended design shows a lowered height for the East Tower reflective of the scale of the already constructed West Tower, although different from the approved scheme, this design provides sufficient articulation to be visually interesting when viewed within the locality. External materials and finishes are complementary to those used on the West Tower and the Highway Hotel and provide continuity across the site. The landscaping shown in the amended scheme will be important in contributing to the amenity of public realm areas.

There is not expected to be any increase in the extent of overlooking or overshadowing from the East Tower due to the lower height, or visual amenity impacts to the immediate residences directly opposite the East Tower. However, due to height and expanse of the abutting supermarket wall, the compact nature, orientation and density of the townhouses, their private open space to the rear will be in shadow for the winter solstice. Whilst not ideal, the location of the townhouses fronting Elizabeth Street has brought a residential façade that is positive to the streetscape and locality.

The development provides an activated public realm area on its northern façade. Pedestrian connectivity has been improved via the proposed walkway, and access via the laneway to the retail/supermarket area has made it more accessible to the local community living to the west and south of the site. Notwithstanding, the implementation of an appropriate lighting strategy and the maintenance of open sightlines will be important to ensure that an appropriate level of passive surveillance continues to support a safe pedestrian environment.

The amended design does pose access challenges due to the retention of the drive-through bottle shop on the Anzac Highway road frontage. Potential conflict points between traffic within the site and Anzac Highway will require ongoing management.

The median strip closure was approved as part of the previous schemes and is still required by Commissioner of Highways due to safety requirements and additional traffic and will be implemented when the development is occupied. All of the public submissions received in relation to this amendment are concerned with the median strip closure. As it is a major development the assessment encompasses more than just the development of the site. It is also about the impact of the development on the surrounding areas. The traffic management of the site and wider arterial road network has been taken into account in the decision to close the median strip.

This decision is supported based on DPTI advice to maintain the efficiency of the road network.

Environmental matters including stormwater management, waste management and construction impacts will require further investigation and consultation.

The Environment Protection Authority (EPA) identified the need to deal appropriately deal with site contamination. The proponent is currently doing an environmental site audit to demonstrate that the site is suitable for its intended use, and will be submitted to the EPA for formal review and endorsement.

7 Recommendation

The proposed amendment to the approved development has been considered in accordance with the requirements of Section 47 of the *Development Act 1993*. The amendment was made publicly available for comment with twenty eight submissions received. The City of West Torrens and relevant State Government Agencies were consulted on the amendment. The proponent provided a response to comments raised, and where appropriate, provided further advice or design revisions.

It is considered that the amended development will not result in any additional impacts (nor a substantial increase in the magnitude of impacts) relating to its interface with the neighbouring Residential Zone to the south, including overlooking, overshadowing, visual impact and general amenity. Given the reduction in the building footprint, the built form outcome and mix of land uses is appropriate to the locality and the objectives of the Urban Corridor Zone. The amendment does, however, create new impacts associated with traffic movements at the Anzac Highway access points which will require on-going management.

This Amendment to the Assessment Report concludes that the potential environmental, social and economic impacts associated with Stage 2 can be minimised to acceptable levels and are manageable through the provision of management plans and final designs.

On balance, the amendment to the approved development is considered to be appropriate and reasonable and warrants development authorisation subject to an amended set of Reserved Matters, conditions and notes.