

Department for Infrastructure and Transport (DIT)

Construction of a single-storey ambulance station and garage with associated car parking and ancillary infrastructure

69 Old Port Wakefield Road, Two Wells

Development Application 25013042



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OVERVIEW

DEVELOPMENT NO.:	25013042
APPLICANT:	Department for Infrastructure and Transport (DIT)
CONSENT SOUGHT:	Development Approval
ADDRESS:	69 Old Port Wakefield Road, Two Wells SA 5501
NATURE OF DEVELOPMENT:	Construction of a single-storey ambulance station and garage with associated car parking and ancillary infrastructure
ZONING INFORMATION:	<p>Zone / Subzone:</p> <ul style="list-style-type: none"> Township Main Street <p>Overlays:</p> <ul style="list-style-type: none"> Hazards (Bushfire - Urban Interface) Hazards (Flooding - General) Native Vegetation Prescribed Wells Area Traffic Generating Development <p>Technical Numeric Variations (TNVs)</p> <ul style="list-style-type: none"> Maximum Building Height (Metres) (Maximum building height is 8m) Concept Plan (Concept Plan 99 - Two Wells) Maximum Building Height (Levels) (Maximum building height is 2 levels)
LODGEMENT DATE:	12 June 2025
RELEVANT AUTHORITY:	Minister for Planning
P& D CODE VERSION:	Version 2025.10 (29 May 2025)
CATEGORY OF DEVELOPMENT:	Crown Development (Section 131 - State Agency development)
APPEAL RIGHTS:	Nil
NOTIFICATION:	Public notification not required pursuant to Section 131 (13) of the <i>Planning, Development and Infrastructure Act 2016</i> as the development cost of works does not exceed \$10 million
REPRESENTATIONS:	NA
REFERRALS STATUTORY:	<ul style="list-style-type: none"> Adelaide Plains Council Commissioner of Highways
DELEGATION:	SCAP (as delegate of the SPC) to provide advice to the Minister for Planning pursuant to Section 131 (17) of the <i>Planning, Development and Infrastructure Act 2016</i> .
REPORT AUTHOR:	Laura Kerber

EXECUTIVE SUMMARY

The application has been made by the Department for Infrastructure and Transport (DIT) and is for the construction of a single-storey ambulance station with attached garage, on-site car parking, and ancillary infrastructure.

The subject land is located at 69 Old Port Wakefield Road, Two Wells, at the corner of Two Wells Road, on the same allotment as the existing local council offices. The site is currently owned by Adelaide Plains Council, who have entered into arrangements to sell the land.

The application involves the demolition of the existing council car park and a shed used by the local Scouts group. State Government is committed to constructing a replacement car park for Council, on an adjacent allotment, separate to this development application. Transfer of ownership to State Government and a land division process will be required to excise the ambulance station site from the existing allotment.

As a State Agency development, the application has been lodged and assessed in accordance with the provisions of Section 131 of the *Planning, Development and Infrastructure Act 2016*. A comprehensive development application including technical reports and plans, has been provided in support of the application.

The development area is located within the Township Main Street Zone of the Planning and Design Code (the Code). The zone envisages a range of retail, office, entertainment and recreation land uses, as well as other businesses that provide a range of goods and services to the local community and surrounding district.

The development cost of the project does not exceed \$10 million therefore public notification was not required.

The Commissioner of Highways provided technical comment regarding the design of the vehicle crossover to Old Port Wakefield Road.

Council does not support the proposal, on the basis that an ambulance station is not an envisaged land use, and the proposal may undermine the intended character of the zone. Council also raised concerns regarding the replacement car park (not part of this development application) and provided technical comments relating to traffic and access, wastewater, stormwater and landscaping.

The subject site was selected by State Government for its central location, serviceability, separation from residential development, and co-location with existing emergency and community services. The station has been architecturally designed to complement existing heritage buildings in the main street, and the garage portion of the station has been set back to reduce its visual impact. Whilst it is acknowledged that an ambulance station is not a land use that people directly interact with on a daily basis, it provides an essential service that benefits the local community and the surrounding district.

The Applicant has responded to Council's technical comments, providing justification for the proposed access arrangements, and designing on-site wastewater and stormwater management systems to meet Council requirements. Council's concerns regarding the replacement car park are noted, and DIT / SAAS remain committed to working Council to deliver a suitable solution.

Overall, the development proposal is not expected to prejudice the desired outcomes of the Township Main Street and is expected to meet the provisions of the applicable Overlays and the relevant General Development Policies.

ASSESSMENT REPORT

1. BACKGROUND

The construction of a new ambulance station in Two Wells is an election commitment of the Malinauskas Government, to cater for the region's growing population.

The State Government has committed a total of \$311.2 million in staffing and infrastructure for the SA Ambulance Service. The investment includes:

- The construction of new ambulance stations for Adelaide, Norwood, Woodville, Golden Grove, Edwardstown and Two Wells.
- Rebuilding stations at Campbelltown, Mount Barker, Gawler, Victor Harbor, Marion and Whyalla.
- Upgrading existing stations at Elizabeth, Mount Gambier, Bordertown, Peterborough, Goolwa, Wallaroo and Aldinga.
- Construction of a SAAS precinct at Richmond Road, Keswick comprising a new Emergency Operations Centre, State Health Control Centre, and Adelaide Ambulance Station.

1.2 Site Selection

The subject site was chosen by the State Government following a detailed site selection process, based on key operational requirements.

Several sites were considered around the Two Wells township, on both Crown and privately owned land. Selection criteria included land use zoning, potential land conflicts, service availability, and flood risk. Private land holdings were ruled out due to the timeframes associated with acquiring property. On-market properties were ruled out due to Premier and Cabinet – Real Property Management (PCC114) constraints and an inability to compete with developers.

The selected site at 69 Old Port Wakefield Road meets SAAS requirements, most notably being centrally located to the four main roads that provide access in and out of Two Wells. This location maximises the 16-minute response coverage area for the new station as shown in Figure 1.

The site is not within a flood plain and has access to service connections.

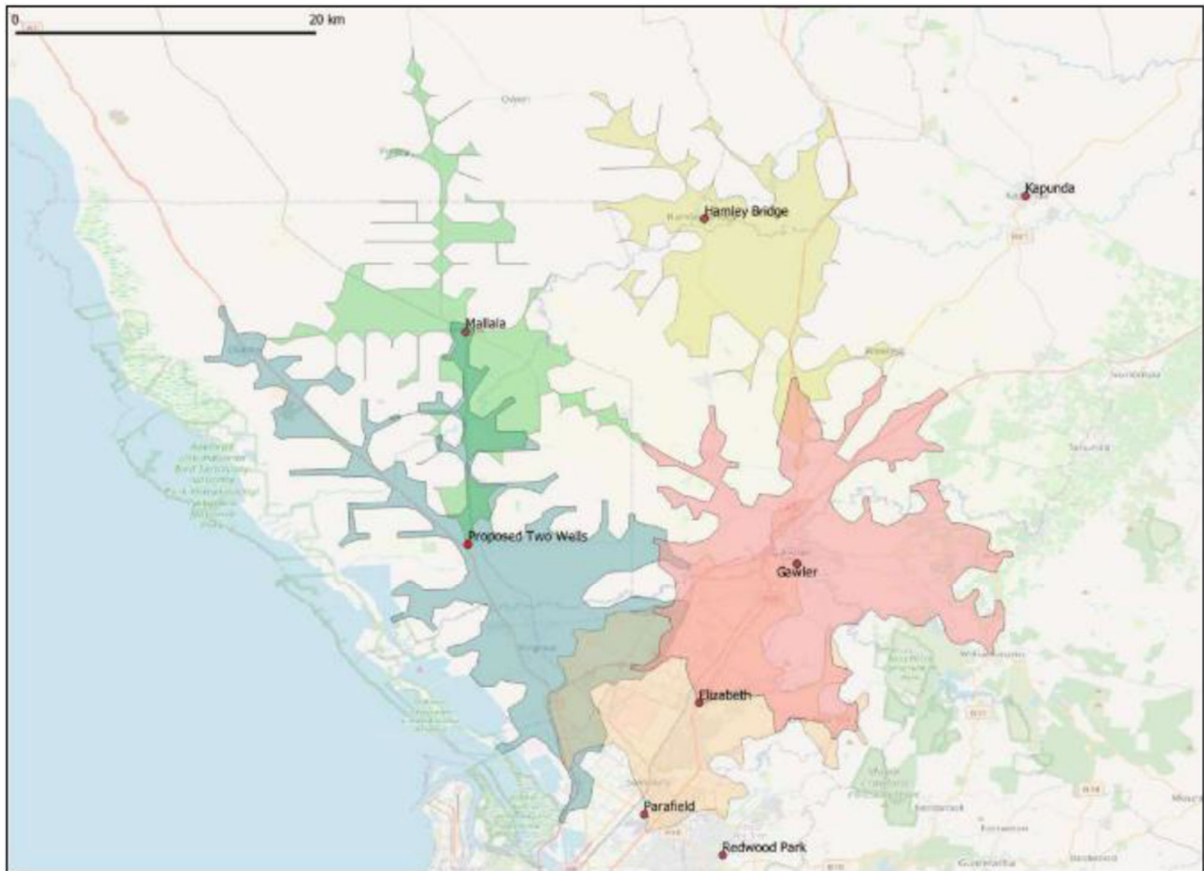


Figure 1: 16-minute response coverage area for the proposed Two Wells station and coverage from existing proposed stations in the surrounding area

2. STRATEGIC CONTEXT

2.1 Greater Plan for Greater Adelaide (GARP)

The GARP identifies Two Wells as a key growth area within the outer north region, along with Riverlea Park and Roseworthy. Two Wells and Riverlea are located on the northwestern growth spine of Port Wakefield Highway, which is one of four major growth spines identified in the Plan. The northwestern growth areas are well connected to strategic employment lands, and existing major transport infrastructure. Refer Figure 2.

Two Wells comprises a large area of land zoned Master Planned Township (MPT), to the north of the township. This area includes the master planned neighbourhoods of 'Liberty' 'Eden', 'Liberty' and 'Longview Estate', developed by Hickinbotham. A new Reception to Year 12 Catholic college (Xavier) is also located within the zone to service the growing community.

Beyond the MPT zone is the Rural Horticulture Zone, within the Environment and Food Protection Area (EFPA).

The GARP earmarks a large section of this Rural Horticulture zoned land (some 1281ha) as *Future Greenfield Supply*, to support the long-term housing land supply needs of the region.

Noting this area is within the EFPA, the strategic objective of this area is to *maintain a greenfield growth schedule of priority locations to be considered for removal and retention from the EFPA, to inform future reviews of the spatial application of the EFPA.*

To accommodate this future growth, the Two Wells and surrounding areas is also identified as a Growth Area Mass Transit Investigation Area. Further investigation will consider long-term public transport options, including mass transit options, to service the growth areas of Riverlea and Two Wells.

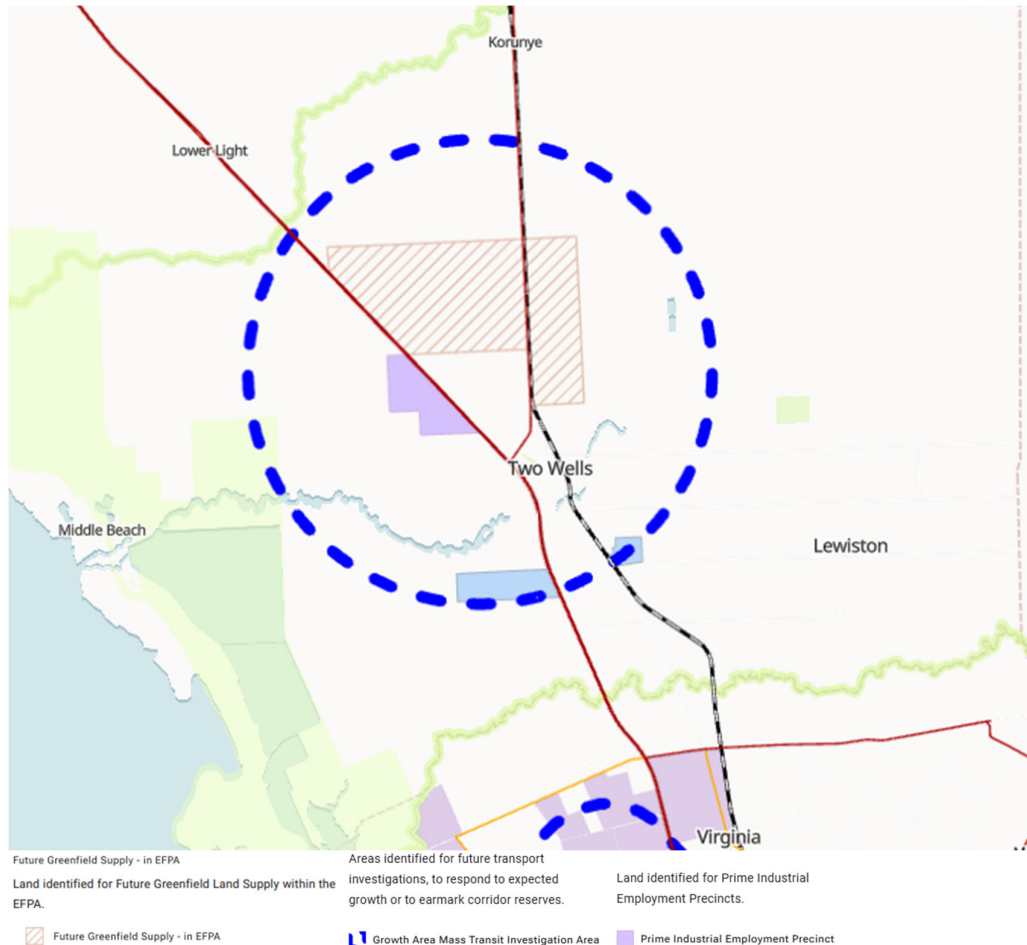


Figure 2: Greater Adelaide Regional Plan

2.2 Land Supply Dashboard

Approximately half of the existing MPT zoned land north of Two Wells township has been granted development approval for residential subdivision, creating some 792 allotments, which are 'housing ready'. Refer Figure 3.

The other half of the MPT zoned land is not yet subdivided and identified as 'undeveloped zoned potential' in the land supply dashboard.

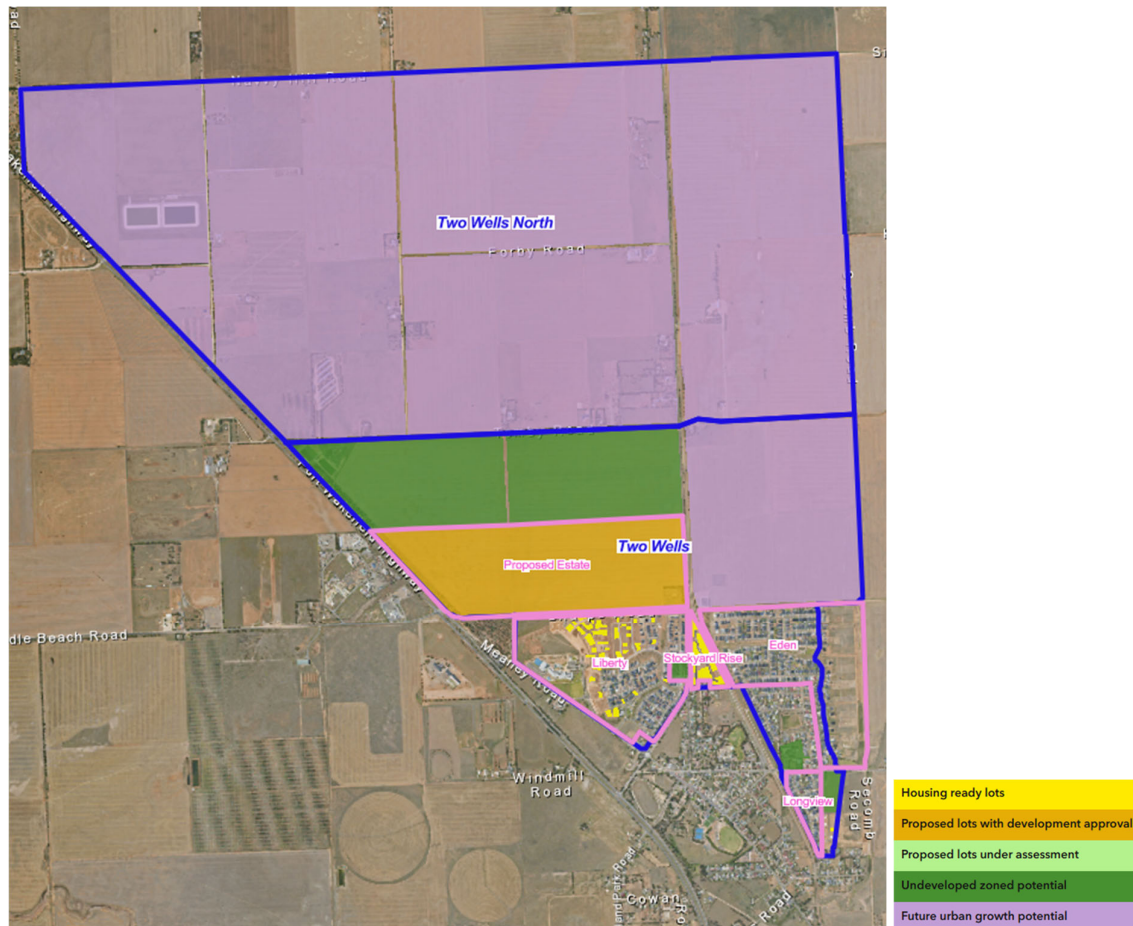


Figure 3: Land Supply Dashboard

2.3 State Planning Policies (SPPs)

State Planning Policy 1: *Integrated Planning* coordinates the strategic use of land with the necessary services and infrastructure. Policy 1.6 seeks that strategic infrastructure helps to shape the pattern of settlement and enhance quality of life.

State Planning Policy 2: *Design Quality* seeks good design to improve the way our streets and places function. Development should be designed in a way that is respectful of the existing and anticipated future neighbourhood character whilst achieving improved liveability and public realm outcomes. Policy 2.1 seeks that development applies the Principles of Good Design. Policies 2.9, 2.10 and 2.10 seek that development has respect for the characteristics and identities of different precincts; makes a positive contribution to the public realm; and manages the interface between modern and traditional building forms.

State Planning Policy 6: *Housing Supply and Diversity* seeks a sufficient and timely supply of land and a variety of housing choices at appropriate locations. Housing should be located close to services, amenities, social and physical infrastructure.

3. DETAILED DESCRIPTION OF PROPOSAL

DIT, on behalf of Department for Health and Wellbeing – SA Ambulance Service, seeks approval to construct an emergency services facility comprising a single-storey ambulance station, attached garage, on-site car parking, and ancillary infrastructure.

The development site is located on the main street of Two Wells township, at the corner of Old Wakefield Road and Wells Road, on the same allotment (A51) as the Adelaide Plains Council offices.

The site is Crown land, under the care and control of Adelaide Plains Council. The land is currently used for car parking associated primarily with the Council offices. A shed is also located on the development site, which is used by a local Scouts group. The shed will be demolished to make way for the new station.

Ownership of the development site, being a portion of Allotment 51, will be transferred to the State Government. On 24 March 2025 the Adelaide Plains Council provided in principle support for the development, and the land transfer, resolving the following:

Ordinary Council Meeting Minutes

24 March 2025

14.8 REQUEST - SA AMBULANCE SERVICE - TWO WELLS AMBULANCE STATION

RESOLUTION 2025/107

Moved: Councillor Lawrence

Seconded: Councillor Parker

“that Council, having considered Item 14.8 – Request - SA Ambulance Service - Two Wells Ambulance Station, dated 24 March 2025:

1. supports, in principle, SA Ambulance Service:
 - (a) establishing an Ambulance facility on the Two Wells Service Centre car park (a portion of Crown Land within Crown Record Volume 6215 Folio 365);
 - (b) establishing new parking to service the Two Wells Service Centre on vegetated land and part of the dog park (the land being part of CR5984/729); and
 - (c) commence statutory processes to transfer care and control of the relevant portion of Crown land to SA Ambulance Service (the land being part of CR6215/365);
2. in noting Council’s support on the rededication request in paragraph 1 above, that Council instructs the Chief Executive Officer to bring back a further report on matters pertaining to design, siting, infrastructure augmentation and funding for elements both within the site and external.”

Councillor Keen left the meeting at 9:02pm and did not return.

CARRIED

A separate land division application will be lodged to excise the ambulance station site from Allotment 51.

To offset the loss of Council’s car parking area currently within the development site, DIT / SAAS propose to fund the construction of a replacement Council car park on adjacent Allotment 53. This would involve the creation of a new vehicular crossover from Wells Road and a new driveway adjacent the existing CFS station. This new car parking and driveway is not part of this development application, and therefore not shown on the proposal plans.

The main elements of this development application are:

- Single storey ambulance station building with pedestrian entrance to Old Port Wakefield Road.
- Attached garage with space for 4 x ambulance vehicles.
- Separate, free-standing shelter for 1 x ambulance vehicle.
- On-site car parking for staff (15 spaces).
- Services area comprising rainwater tanks, bin storage, bicycle parking, and provision for future EV charging station.
- Back-up generator within enclosure.
- New vehicle crossovers to Old Port Wakefield Highway and Wells Road.

Built Form

The new station building has been architecturally designed by Grieve Gillett Architects.

The building is arranged in a “T” shape, with the station component extending perpendicular from Old Port Wakefield Road and attached garage running parallel to Old Port Wakefield Road.

The station comprises training and meeting rooms, offices, crew room and kitchen, four (4) x Personal Wellbeing and Restorative Breakrooms (PWRBs), staff amenities, storage and utilities areas. An attached porch to the side (east) of the building provides outdoor space for staff.

The attached garage faces Old Port Wakefield Road with three (3) automatic roller doors, and internal capacity for four (4) x ambulance vehicles.

Vehicle movements and access

Two vehicular access points are proposed. Ambulance vehicles will enter the site from Wells Road via a new 6m wide crossover. This crossover will also be used by staff entering and exiting the staff car park and will be a controlled, gated entrance. Ambulance vehicles will exit the site to Old Port Wakefield Road via a new, 12.3m wide crossover.

Landscaping, Fencing and Pavements

A detailed landscaping plan including vegetation plantings, fencing and pavements has been prepared by WAX Design.

Vegetation plantings, comprising a mixture of trees, shrubs, herbaceous and grass species, are proposed within garden beds around the perimeters of the site. Tensioned vertical cables are proposed to the front façade of the station building (fronting Old Port Wakefield Road), to support climbing plants. An area of irrigated lawn is proposed to the east of the staff car park.

The fencing plan proposes solid, colorbond fencing (height 2.1m) around the utilities area (west of the garage, adjacent Wells Road) and along the eastern and southern site boundaries. The automatic sliding access gate at the Wells Road entrance point will be steel with perforated artwork (design to be determined).

Exposed aggregate concrete is proposed for all vehicle manoeuvring areas. This includes the ambulance egress area, in front of the garage, which will be visible from Old Port Wakefield Road.

Staffing

The station will initially be staffed for a single 12-hour day shift, with operations to increase to 24-hour operation in the future. Four (4) paramedics will be on duty at any one time, along with clinical leaders, support clinicians and a small administrative team.

Proposal Plans

The full suite of proposal plans, including schedule of materials, is provided in Attachment 1B.

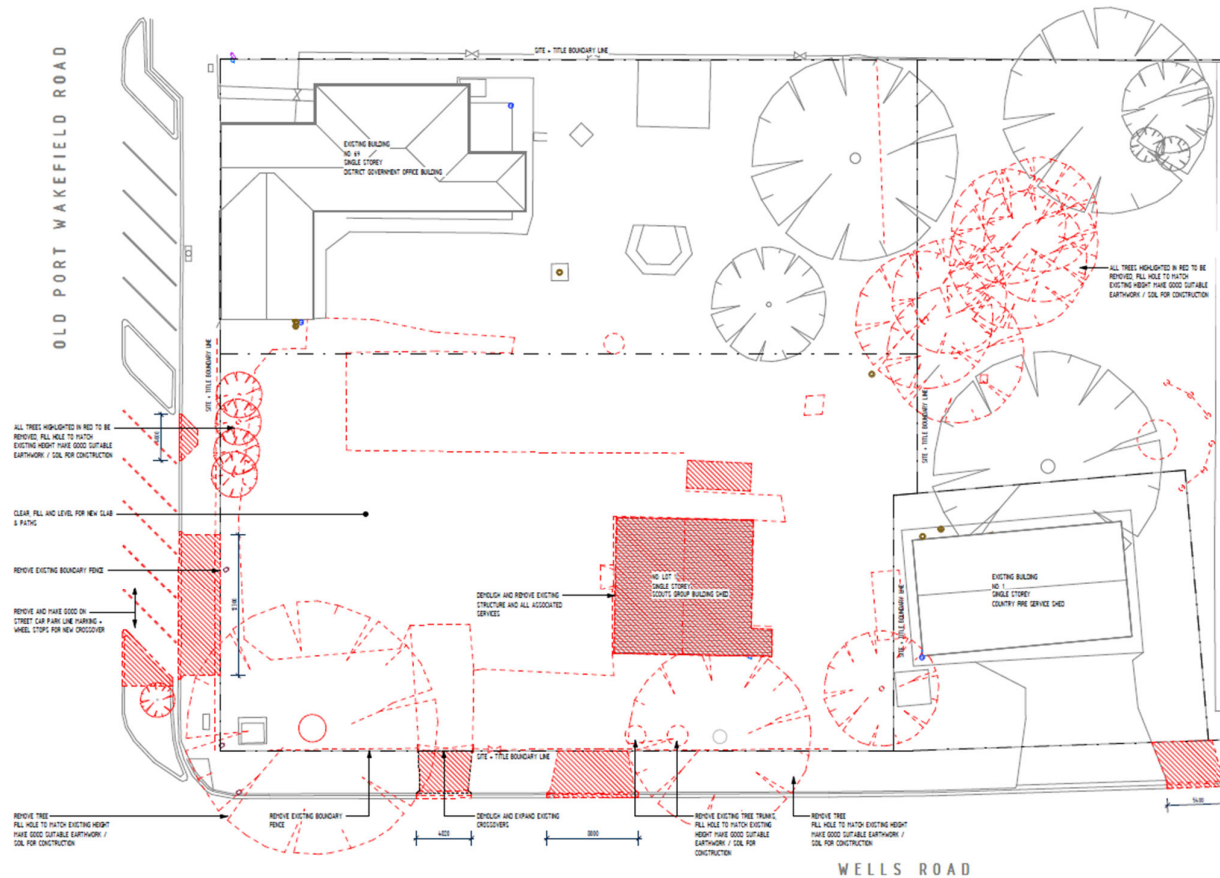
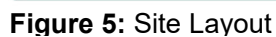


Figure 4: Demolition Plan



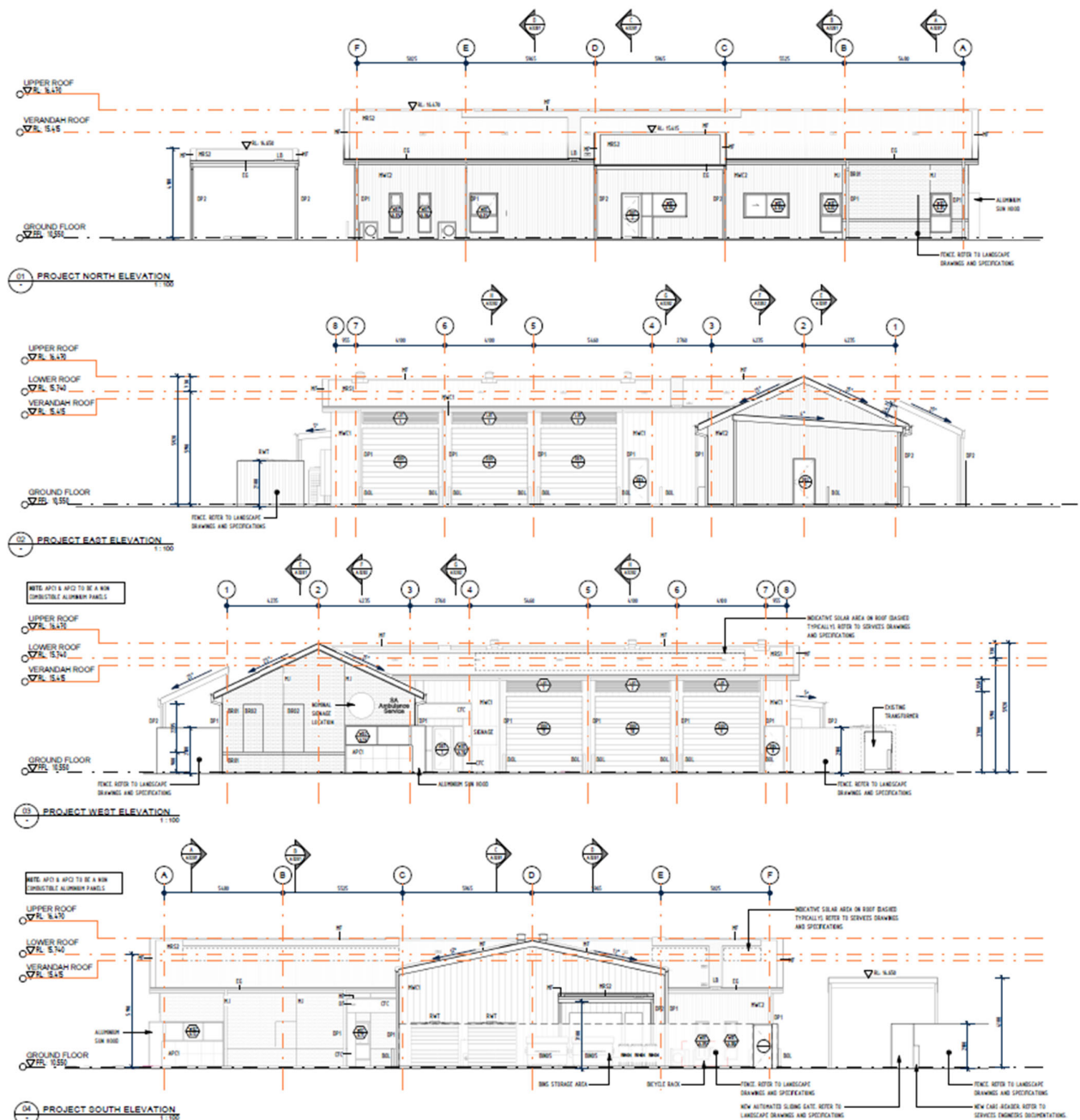


Figure 7: Building Elevations



Figure 8: Location Plan – subject land (Source: SAPPa)



Figure 9: Zoning Map (Source: SAPPa)

4. SITE AND LOCALITY

Location reference: 69 Old Port Wakefield Road, Two Wells SA 5501

Title reference: CR 215/365 **Plan Parcels:** DP73399 AL51 **Council:** Adelaide Plains Council

4.1 Site Description

The development site is part of Allotment 51, located on the main street of Two Wells (Old Port Wakefield Road) at the corner of Wells Road.

The site comprises the Adelaide Plains Council offices and a shed which is used by the local Scouts group. The remainder of the site is used for car parking, with access from Wells Road.

Trees are located along the site boundaries, and scattered around the Council office building. A large, mature pepper tree is located on the corner of Old Wakefield Road and Walls Road.

The subject site is located on a Council controlled section of Old Port Wakefield Road. Approximately 80m to the north-west of the site, at the intersection with Gawler Road, Old Port Wakefield Road is under DIT care and control.

4.2 Locality

The subject site is within the main street of Two Wells which supports a range of retail, consulting, hospitality and recreational land uses, as well as essential community services.

Directly opposite the subject site, across Old Port Wakefield Road, is a vacant allotment, motel and medical centre / consulting rooms. South-east of the subject site, along the main street, is a public library, public toilets, post office, police station, playground and civic park.

Old Port Wakefield Road has a wide carriageway with parking on both sides, wide footpaths and street trees. Several buildings in the main street are heritage listed. Wells Road is a no-through road that ends at Port Wakefield Highway. Both roads are under the care and control of Council.

Planning consent (DA 24040444) has been granted by Adelaide Plains Council over the adjacent land to the north-west of Wells Road, for the Two Wells Town Centre Stage 1 - Construction of a supermarket (shop), specialty shops, childcare centre, community facility, two-storey medical centre (consulting rooms). Refer Figure 10.

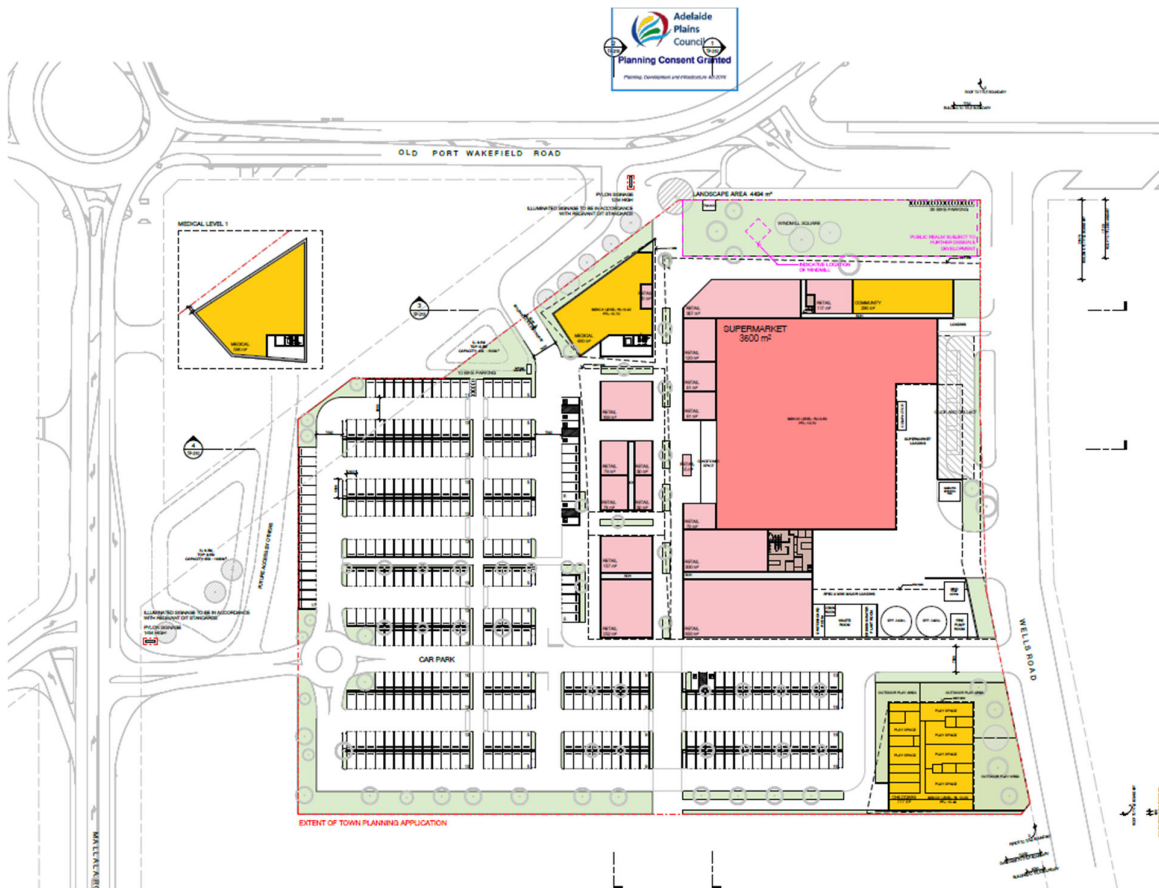


Figure 10: Concept Layout for DA 24040444 (Source: Leyton Property)

5. CATEGORY OF DEVELOPMENT

PER ELEMENT:

- Change of use
- Building work
- Fences (not development per Schedule 4(4)(1)(d))

OVERALL APPLICATION CATEGORY:

- Performance Assessed – Crown Development

REASON

The application is lodged by Department for Infrastructure and Transport (DIT), a State Agency and was subsequently lodged with the State Planning Commission (SPC) under Section 131 of the Act.

6. STATUTORY / TECHNICAL REFERRAL BODY COMMENTS

Full copies of referral comments and the Applicant's response are available in Attachments 2 and 3, and summarised below.

Adelaide Plains Council:

On 7 July 2025 Council advised that it does not support the proposal, expressing concerns as follows:

- Scope of development: the development application does not include the replacement Council car park proposed for adjacent allotment 53. In the absence of a Land Management Agreement or a boundary realignment to merge the existing Council offices with the proposed new car park, this proposal is not supportable.
- Replacement car park: whilst not part of this development application, Council has raised concerns about the location and design of the replacement car park on allotment 53, and its connectivity to the Council offices.
- Proposed land use: an ambulance station is at odds with the envisaged land uses in the zone. The proposed development fails to present as a compatible civic or community facility, does not provide meaningful public realm activation, and risks undermining the intended character of the zone.
- Design and appearance: whilst the inclusion of a brick façade and use soft grey materials is acknowledged, the proposed built form is inconsistent with the character of a main street. Council does not support the proposed 2.1m high boundary fencing.
- Ancillary structures: the location of service areas, and plant equipment near the Wells Road frontage is not supported.
- Traffic and access: Council sought independent advice from traffic consultant Melissa Mellen (MFY), raising several concerns with the design and location of emergency vehicle egress to Old Port Wakefield Road. The width of the new crossover and loss of on-street parking is not supported. Council's preference is for the alternative access design, which would see all vehicle ingress and egress from Wells Road (refer to Figure 11).
- Wastewater: the subject site does not currently have a local wastewater system and needs to manage wastewater on site. Investigations are underway for a CWMS system to service the local area, which would necessitate infrastructure being located on the subject site. The proposal needs to indicate both an interim wastewater solution, and how the new CWMS would be accommodated.
- Stormwater: stormwater must be managed on site and cannot be directed to the street as currently proposed – this is not supported by Council. Stormwater from the existing Council offices must also be managed onsite, and not cross property boundaries.
- Landscaping: the proposed plant species are acceptable. Removal of the large pepper tree may raise community concern given its size, age and history.



Scope of Development & Replacement Car Park

The subject site will be transferred to the care and control of SAAS (under the Minister for Health and Wellbeing), in accordance with Council's resolution at the 24 March meeting. A land division application will be required to facilitate this transfer.

DIT / SAAS is also continuing discussions with Council to identify a suitable relocation site for the Scouts SA facility. The Department for Health and Wellbeing has committed funding to purchase a replacement storage container to be used for the Scouts at the new location.

The applicant engaged Tonkin to provide a revised Traffic Impact Assessment which responds to Council's comments.

OFFICIAL

Tonkin also notes that traffic on Wells Road is anticipated to change in nature and volume with the approved Town Centre development (west of Wells Road). The approved town centre development includes a supermarket loading bay from Wells Road which accommodates vehicles up to 19m semi-trailers. It is also proposed that 8.8m Medium Rigid Vehicles will occasionally reverse to / from Wells Road to access the loading bay for dining facilities. These manoeuvres may conflict with ambulance egress under emergency situations, further increasing response times.

Traffic and Access are discussed in detail in Section 8.5 of this report.

Wastewater

Local service provider Alano Water intends to construct sewer infrastructure in the locality, including a pump station to the south of the subject land, with connection available from mid 2026.

Until a CWMS connection is available, the ambulance station must manage all wastewater via on-site solution. The applicant engaged Secon to design a suitable on-site wastewater solution, which is provided in Attachment 1J. The updated proposal plans also confirm the location of the existing septic system for the Council offices.

Wastewater is discussed in detail in Section 8.4 of this report.

Stormwater

The applicant engaged Tonkin to provide a revised Stormwater Management Plan which responds to Council's comments.

Notably, the updated SMP provides a solution for re-routing Council's stormwater flow to Old Port Wakefield Road, without traversing the ambulance site.

Stormwater is discussed in detail in Section 8.4 of this report.

Landscaping

The applicant engaged WAX design to provide a revised landscaping plan which responds to Council's comments. As specifically requested by Council the updated plan does not include *Eucalyptus camaldulensis*, and adequate spacing is provided between tree planting and the Council office.

Landscaping is discussed in detail in Section 8.2 of this report.

Adelaide Plains Council (follow-up advice):

Council was invited to review the Applicant's response and confirm its position in relation to the proposal.

On 22 August 2025 Council confirmed that it does not support the proposal, for the following reasons:

- Replacement car park: the development does not include the construction of a replacement car park (on adjacent land) for Council's service centre. This remains a fundamental issue, with the car park to be constructed in adjacent land that has no legal connection to the associated land use (Council offices). In the absence of a Land Management Agreement, or boundary realignment, this is at odds with relevant code provisions.

- Traffic and access: Council's traffic consultant Melissa Mellen (MFY) does not accept the analysis relating to the alternative access arrangements (per Figure 11), but notes that other issues could be resolved with some minor design changes.

Council did not recommend any conditions or advisory notes, in the event that development authorisation is granted.

Commissioner of Highways (CoH)

The application was referred to the Commissioner of Highways as a non-mandatory referral under section 131 of the PDI Act 2016.

The CoH does not have any major concerns with the proposal, but offers the following advice:

- CoH recommends a review of the access location on Old Port Wakefield Road, as it does not comply with AS/NZ 2890.1.
- Noting the adjacent site to the north-west will be redeveloped as a shopping centre, this will result in changes to the Old Port Wakefield Road / Gawler Road junction and may result in an increase in pedestrian movements in the area.

Applicant response:

Location of Access

The Applicant's response to Council included an updated Traffic Impact Assessment from Tonkin, which recommends that the existing kerb build-out at the corner of Wells and Old Port Wakefield Road be re-shaped to meet Australian Standards, whilst accommodating the new ambulance crossover.

Traffic and Access are discussed in detail in Section 8.5 of this report.

7. POLICY OVERVIEW

The subject site is located within the Township Main Street Zone of the Planning and Design Code (the Code) Version 2025.10 (29 May 2025) under the *Planning, Development and Infrastructure Act 2016*.

Relevant planning policies are contained in Appendix 1A and are summarised below.

7.1 Zoning

Township Main Street Zone

The Township Main Street Zone anticipates a range of retail, office, entertainment and recreation land uses, as well as other businesses that provide a range of goods and services to the local community and surrounding district.

Envisaged land uses detailed in PO 1.1 include a child care, community facility, indoor recreational facility, consulting room, hotel, cinema, library, office, place of workshop, shop, tourist accommodation and dwellings.

The policy framework seeks an active and vibrant main street, with welcoming spaces for residents and visitors to shop, work, meet, entertain and relax. Development should complement the traditional low-scale main street built form, with shade / shelter for pedestrians.

Ancillary structures including outbuildings, carports and garages should be located behind the primary building facing the main street. Dwellings are anticipated in conjunction with non-residential uses and should not prejudice the operation of non-residential development. Development should minimise the need for vehicle crossovers to the main street, to reduce conflict with pedestrians and avoid disruption to built form continuity. Vehicle parking should be located behind buildings, away from the primary street frontage.

7.2 Overlays

The Code identifies the following Overlays which apply to the proposed development site.

7.2.1 Hazards (Bushfire – Urban Interface)

Desired Outcome: DO 1	Performance Outcome: POs 2.1
Key policies: Urban neighbourhoods that adjoin areas of General Bushfire Risk should allow access through to bushfire risk areas; facilitate evacuation from bushfire danger; and be designed to protect life and property from the threat of bushfire.	
Planning Assessment: The subject site is located approximately 300m from the Hazards (Bushfire – General Risk) Overlay, which extends south-west from Port Wakefield Highway, and encircles the township of Two Wells to the south and east. The proposed development is strategically sited in a location that has low fire risk, with access to all major routes into and of Two Wells township.	

7.2.2 Hazards (Flooding – General)

Desired Outcome: DO 1	Performance Outcome: POs 1.1, 2.1, 3.1
Key policies: Emergency services sited away from flood areas to enable uninterrupted operation. Buildings that contain hazardous materials designed to prevent spills or leaks during a 1% AEP flood event to avoid potential environmental harm.	
Planning Assessment: The overlay applies to the western portion of the site, adjacent to the proposed Wells Road access point, and impacts areas of the site proposed for parking and vehicle maneuvering. To mitigate flood risk a Finished Flood Level (FFL) of 10.55m AHD is proposed. This equates to the top of the kerb at Old Port Wakefield Road plus 300mm vertical clearance.	

7.2.3 Native Vegetation

N/A - the Applicant has declared that the proposal does not involve the clearance of native vegetation or is exempt from requiring clearance approval under the *Native Vegetation Act 1991*.

7.2.4 Prescribed Wells Area

N/A - the proposal will not involve the taking of water from a groundwater resource for which a licence would be required under the *Landscape South Australia Act*. No referrals were triggered under this Overlay.

7.2.5 Traffic Generating Development

Desired Outcome: DO 1, DO 2	Performance Outcome: POs 1.1 to 1.3
Key policies: Safe and efficient operation of Urban Transport Routes and Major Urban Transport Routes for all road users and the provision of safe and efficient access to and from urban transport routes and major urban transport routes.	
Planning Assessment: The subject site is approximately 82m south-east from the nearest State maintained road (intersection of Gawler Road and Old Port Wakefield Road). The proposal is not a class of development listed in the referral table of Overlay, and therefore did not trigger a statutory referral to Commissioner of Highways. Notwithstanding, the application was informally referred to CoH due to its proximity to the state maintained road network and the nature of development. Refer to section 6 for a discussion of CoH's comments and the Applicant's response.	

7.3 Technical Numeric Variations (TNVs)

- Maximum Building Height (Metres) (Maximum building height is 8m)
- Concept Plan (Concept Plan 99 - Two Wells)
- Maximum Building Height (Levels) (Maximum building height is 2 levels)

The proposed station is single storey with a ridge height of 6.02m above ground level. This is consistent with the TNVs for the site, and in keeping with existing development along the street, which is predominantly single storey.

The development site is not within the boundary of Concept Plan 99 (refer Figure 12). The Concept Plan relates to future growth within the Master Planned Township Zone, north of the Two Wells township, including new road networks, neighbourhood activity node / activity centre, and connections to Port Wakefield Road.

The new ambulance station supports the intent of the Concept Plan by providing an essential, emergency service for the growing community.

7.4 Development Policies

The following General Development Policies have been identified as having relevance for this development:

Key policy reference	Relevant policies
Township Main Street Zone	DO1, 2; PO1.1, 1.2, 1.5; PO2.1, 2.2, 2.7, 2.8; PO3.1, 3.4, 3.5, 3.6, PO4.1, 4.2, PO5.1; PO31.1, 31.2, 32.1
General Policies	

Design	DO1, PO1.1, 1.2, 1.3, 1.4, PO1.5, PO2.2, 2.3, 2.4, PO 3.1, 3.2, PO4.1, 4.2, 4.3, PO5.1, PO7.1 – 7.7, PO9.1
Interface between Land Uses	DO1, PO 2.1, 4.1, 4.2, 6.1
Site Contamination	DO 1, PO 1.1
Transport, Access and Parking	DO1, PO1.1, 1.2, 1.3, 1.4, 2.1, 2.2, 3.1, 3.3, 3.4, 3.5, 3.8, 3.9, 4.1, 5.1, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 9.1

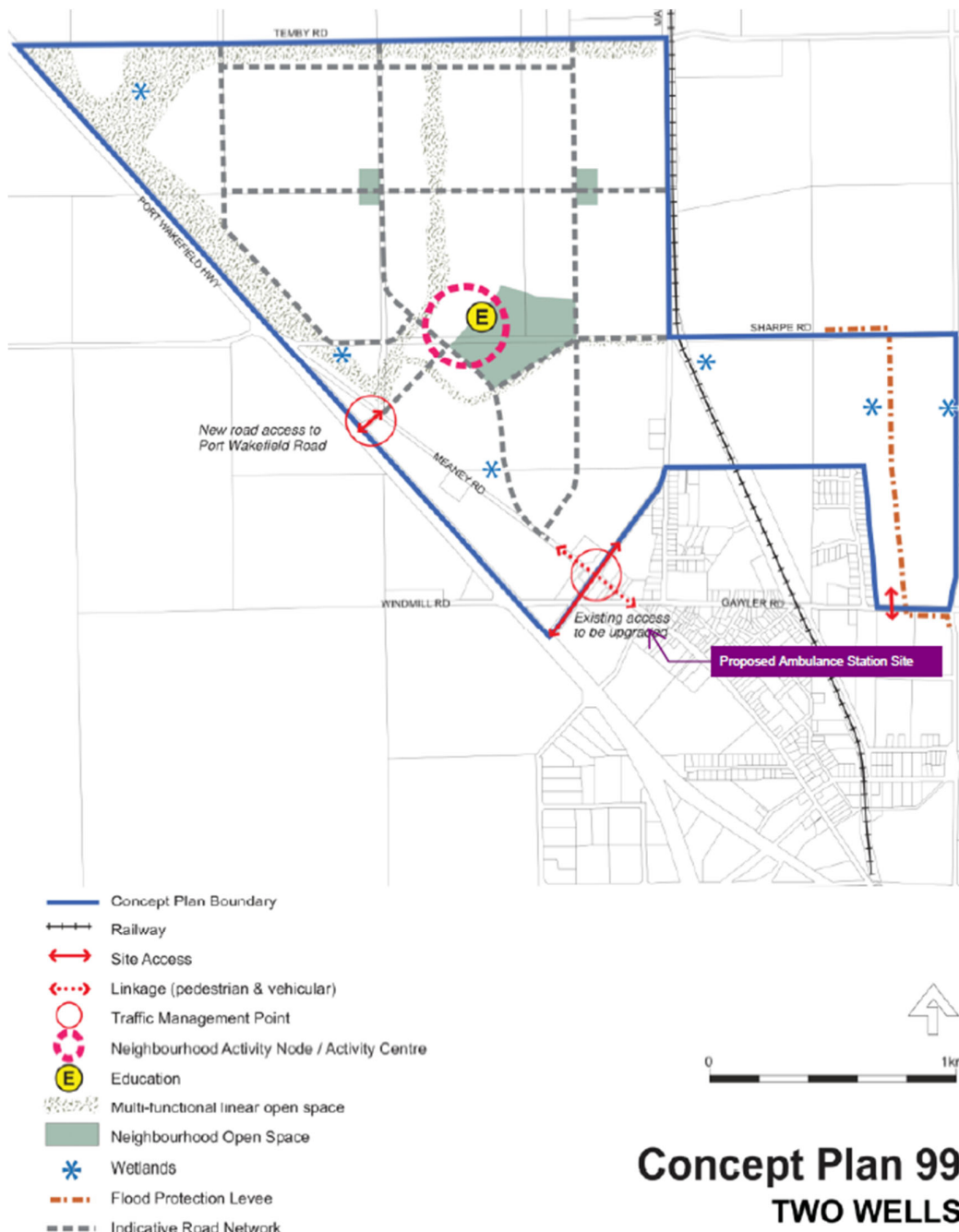


Figure 12: Concept Plan 99 – Two Wells

8. PLANNING ASSESSMENT

The s131 Crown development assessment pathway is not a code assessment pathway, and the legislation is not prescriptive with respect to the State Commission Assessment Panel's assessment. Section 131(14) simply states that *'the Commission will then prepare a report to the Minister on the matter'*.

The Crown and Impact Assessment team, under delegation of the SCAP, undertake a merit-based assessment of Crown development applications. This includes an assessment against the relevant Code provisions (per Appendix 1A) as well as State Planning Policies, State Government policy, and any other relevant State Government priorities.

8.1 Land use

The Township Main Street (TMS) Zone envisages a range of retail, office, entertainment, recreational and commercial land uses that create a welcoming main street environment and reinforce traditional main street character.

An emergency services facility is not listed as an envisaged use in PO 1.1 of the TMS Zone. The proposed land use is not listed as Restricted and defaults to a Performance Assessed category of development in the zone.

In considering the merits of an emergency services facility on the proposed site, it is worth noting that the code specifically envisages emergency services facilities within several land uses zones, however none of these exist within the Two Wells suburb:

- Community Facilities
- Masterplanned Neighbourhood Zone
- Suburban Activity Centre
- Township Activity Centre
- Urban Activity Centre

Council considers that the proposal is at odds with the policy intent of the zone, as it does not offer a community facing business or public access venue. Whilst it is acknowledged that an ambulance station is not a facility that people directly interact with on a daily basis, it provides an essential service that benefits the wider community.

An emergency services facility is not considered incompatible with the envisaged or existing land uses within the zone. The new ambulance station will be co-located with the existing Country Fire Service (CFS) Station on Wells Road, and Council offices on Old Port Wakefield Road. The Two Wells Police Station is located south-east on Old Port Wakefield Road, also within the TMS Zone.

The proposed site has generous separation from residential areas and is not expected to prejudice the operation of existing or envisaged land uses in the zone.

Council's concerns around the visual impacts and public realm interface of the station to Old Port Wakefield Road are discussed elsewhere in this report.

8.2 Design

Policies outlined in the Design GDPs (DO1) seek development that is contextual, durable, inclusive and sustainable. Primary policy matters identified focus on:

- contextual to the built environment, fit for purpose, integrated and sustainable development
- built form aesthetic outcomes
- stormwater management and pollutants and water quality
- on-site activities such as loading/unloading, storage, waste, wash-down areas

The TMS Zone seeks development that preserves main street character, complements the traditional low-scale built form, and creates visual interest and an active interface with the main street frontage.

Built Form, Character and Appearance

The “T” shaped building has been architecturally designed and sited to respond to existing development in the locality, whilst delivering the functionality required for an emergency services facility.

The station protrudes to Old Port Wakefield Road with a frontage of 8m wide, and pedestrian entrance connecting to the public footpath. This section of the station, with gable roof and red brick façade, is complementary to the bulk, scale, and appearance of the adjacent Council offices and other heritage buildings in the main street. Refer Figure 13.



Figure 13: Existing brick heritage buildings in Two Wells main street (library, old courthouse and council offices) compared to proposed ambulance station (artists impression)

The ambulance garage is more utilitarian in appearance with grey colorbond metal cladding to all external facades. To reduce its visual dominance in the streetscape, it is recessed 11m behind the station's front façade.

Council acknowledges that the brick portion of the station achieves '*some level of contextual alignment*' with the heritage character of the main street, but considers that the overall appearance of the building is inconsistent with the finely grained built form typical of main street townships.

As noted by Council, the zone calls for a more active frontage with regular openings, windows and '*visible building functions*'. Whilst these outcomes are not feasible for an ambulance station (due to operational requirements), the design and scale of the brick station, and recessed nature of the garage is considered sufficient to complement the existing built form and heritage character of the main street.

In accordance with PO 4.1 of the TMS Zone, Council does not support the 12.3m wide crossover to Old Port Wakefield Road due to interruption of the pedestrian network, as well as the loss of on-street parking, sightline issues, and visual impact. The rationale for vehicle access arrangements is discussed in Section 8.5 of this report.

The proposed pedestrian / ambulance interface is like other ambulance stations across the state, as show in Figure 14 below. Whilst there is no signage or lights to alert pedestrians when ambulances need to exit, the generous width of the crossover provides adequate sight lines, such that conflicts are not expected.



Figure 14: Examples of other ambulance stations with similar pedestrian / ambulance interface (Marion and Mount Gambier)

The location of staff car parking, behind the station and away from the main street, is consistent with PO 4.2 of the TMS Zone.

Similarly, the negative visual impact of ancillary structures (water tanks, plant, bin storage area etc) is reduced by clustering these elements on the western side of the building, where they are set back from the main street frontage and screened by a 2.1m fence. This is generally consistent with the policy framework provided in the PO 1.4 of the Design GDPs for

positioning plant and equipment in unobtrusive locations, however Council does not support the location on the basis that it is not positioned behind the main building, and '*detracts from the intended main street activation*'.

Whilst advertising is exempt from requiring development approval pursuant to Schedule 13 of the PDI Regulations, the façade mounted signs proposed for the station are relatively discreet, limited in size, and consistent with the existing signage of main street businesses per PO 5.1 of the TMS Zone.

Height

The proposed station is single storey with a ridge heights of 6.02m above ground level. This is consistent with the TNVs for the site for a maximum building height of 8m / 2 storeys, and in keeping with existing development along the street, which is predominantly single storey.

Boundary Setbacks

The TMS Zone encourages built form to the front and side boundaries of allotments, to achieve a continuous façade to the main street. The Design GDP module states that where zero setbacks are desirable, shelter should be provided over footpaths.

Due to the setback of the garage from both Old Port Wakefield and Wells Road, the proposed development does not fulfil all policy outcomes. Shelter over the footpath is not provided, and the design does not reinforce the corner block.

The layout of the development, with respect to boundary setbacks, has sought to achieve a balance between built form outcomes (consistent with the main street character), and operational requirements for the station and its higher order public purpose.

The proposed setbacks of the station building are as follows:

- North (front): The station building is setback 700mm from Old Port Wakefield Road. This is generally consistent with PO 3.4 (Zone) that encourages the construction of buildings to the front (main street) boundary to achieve a continuity of street façade. The garage is setback 11.7m from Old Port Wakefield Road to facilitate safe ambulance exit and reduce the visual impact of this part of the building.
- East (side): 6m setback from the existing Council building, and 3m from the proposed new allotment boundary (subject to future land division). The open sided porch on the eastern façade will abut the proposed new allotment boundary.
- South (rear): 31.6m from the rear façade of the main station building, and 24m from the separate ambulance parking shelter.
- West (side): 5.38m setback from Wells Road. The generator, bin storage, plant and bicycle parking are clustered in the area between the station building and Wells Road boundary.

The setbacks provide appropriate separation between land uses. The development does not abut a neighbourhood type zone, such that overshadowing and overlooking impacts are not anticipated per PO 3.2 and 3.3 of the TMS Zone.

Landscaping and Fencing

The Design GDPs encourage landscaping and tree planting to minimise heat absorption, provide shade and shelter, contribute to stormwater infiltration, and enhance the appearance of land and streetscapes.

The landscaping plan incorporates 13 new trees, located along the western side of the staff car park, around the break out area, and at the north-west corner of the site. These trees will offer some shade to the staff car park, although additional trees could be considered along the eastern side of the parks.

Two trees are proposed at the corner of Old Port Wakefield and Wells Road, to replace the large peppertree that is being removed. The Significant and Regulated Tree overlay does not apply in Two Wells, and removal of the tree does not require any approval, however Council has noted that removal of this peppertree may cause community concern due to its size, age, and prominence in the streetscape.

The garden beds proposed around the site will assist in overall site amenity. Council supports the species selection, and as requested by Council *Eucalyptus camaldulensis* (river red gum) has been removed from the planting schedule.

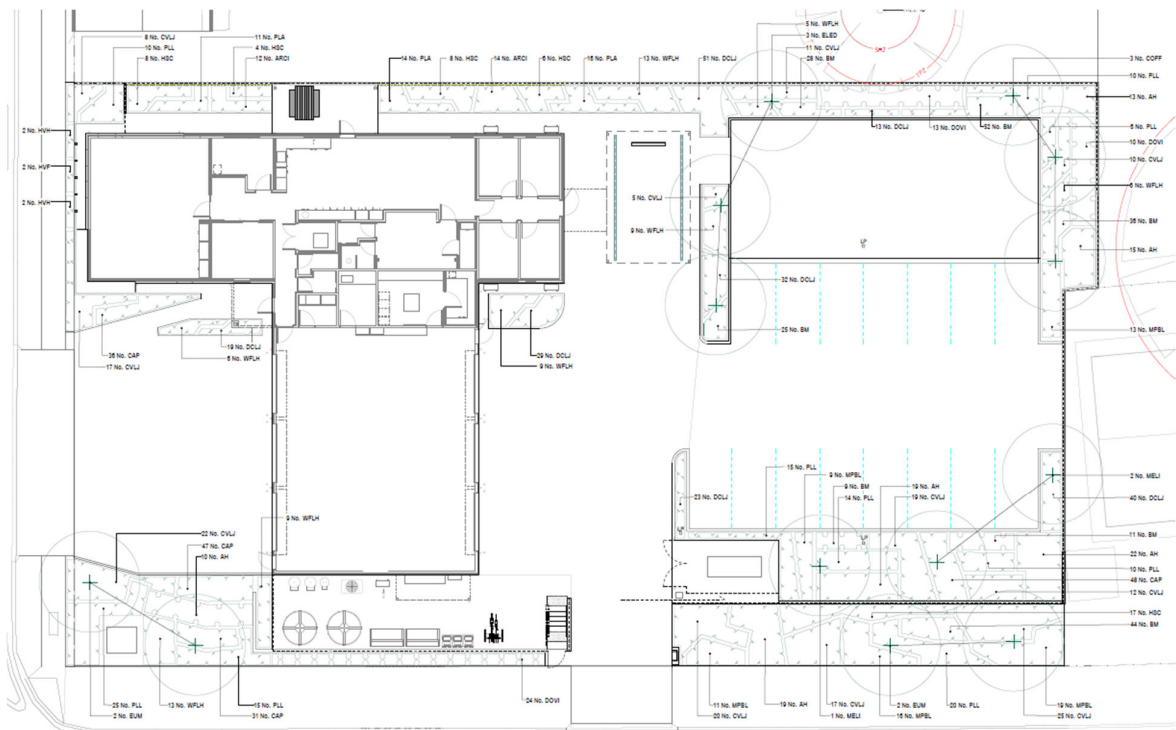


Figure 15: Landscaping Plan

The vehicle sliding gate from Wells Road will be perforated steel mesh with an artwork incorporated, similar to the recently constructed new stations (refer Figure 16).

Council does not support the proposed 2.1m high (solid) colorbond fencing proposed around the services area, citing an '*excessively high and visually intrusive structure adjacent to Wells Road*'. It is acknowledged that there is a trade-off between screening of the services area and the visual impact of this fence, however 2.1m is a standard fence height and for this reason is excluded from the definition of development under Schedule 4(1)(b) of the PDI (General) Regulations 2017. In addition, the fence is set back some 10.5m from Old Port Wakefield Road, and is not continuous along the western (Wells Road) site boundary, both factors which provide visual relief from the public streets.

Overall, the landscaping plan incorporates high quality finishes and is expected to enhance the appearance of the site and soften the built form.



Figure 16: Perforated steel access gate – new Mount Barker ambulance station

Environmental Performance

The orientation and design of the building has been dictated by the subject site, adjacent land uses, and functional requirements of the station. Mechanical heating and cooling are expected to be required, noting the facility will operate on a 24/7 basis in the future. Solar photovoltaic panels can be accommodated on the roof of the garage.

The building includes a 3m wide verandah attached to the crew room / kitchen to provide a shaded outdoor space for staff.

8.3 Interface impacts

Primary policy matters (DO1, PO 1.2, 2.1, 4.1, 5.1, 6.1, 6.2) focus on mitigation of interface impacts, hours of operation, noise, air quality and lighting.

One of selection criteria for the subject site was its separation from sensitive land uses. The subject does not abut a neighbourhood type zone, and there are no known existing dwellings in close proximity (noting that the TMS does anticipate dwellings in associated with non-residential land uses).

The adjacent land uses (CFS station to the south, Council offices to the east, commercial / retail / hospitality to the north, and future 'town centre' development to the west) are not considered to be 'sensitive' land uses, which would be negatively impacted by the ambulance station.

The ambulance station will eventually operate on a 24/7 basis, and will generate relatively low levels of traffic, noise and light as follows:

- Ambulances typically only utilise sirens when on the public road network, not within the ambulance facility.
- A generator with acoustic enclosure is proposed, to provide back-up power to the station. The generator will only be used in emergency situations, and for periodic testing.
- A lighting plan is not provided with the application but is expected to be focused on building and parking areas. A standard condition of approval is recommended in relation to light spill.

- A small number of staff will be located on site. The occasional use of the site for training purposes is not expected to generate unreasonable levels of noise.

8.4 Flooding, Stormwater and Wastewater

Flooding

PO 1.1 of the Flooding – General Overlay states that emergency services should be sited away from flood areas and outside of the 1% AEP flood event.

Existing flood mapping for the region (2017 data) shows that the subject site borders the 1%AEP flood plain (Wells Road is within the flood plain). The mapping indicates potential inundation of a small section of the western portion of the site in the 1% AEP flood event. A flood mitigation levee is currently being constructed east of the Two Wells township, which would alleviate this risk, however the existing flood mapping is relatively dated and does not consider climate change.

Due to the development being an emergency service facility, the ambulance station should be designed to remain operable in the event of levee failure. Relevant guidelines recommend that emergency services be designed for the 200 yr ARI (0.5% AEP).

Tonkin's SMP recommends a Finished Floor Level of 10.55m AHD (top of kerb at Port Wakefield Road plus 300mm vertical clearance) to protect against local stormwater flows during a flood event. This will protect against the 1% AEP (no levee) scenario, and is therefore consistent with the overlay policies. The flood protection measures will ensure that vehicles can access the site from Old Port Wakefield Road during a flood event, noting that Wells Road may be inundated.

Updated regional flood mapping would need to be undertaken to confirm validation of the 0.5% AEP.

Stormwater Management

PO 5.1 of the Design GSPs states that development is sited and designed to maintain natural hydrological systems without negatively impacting surface and groundwater.

A Stormwater Management Plan (SMP) has been prepared by Tonkin Consulting (refer Figure 17). Existing stormwater infrastructure in the area is informal, with surface water generally draining overland to road kerbs. Runoff from the existing Council building is currently directed over the proposed development site.

The proposed development will increase impervious surfaces and runoff. The proposed stormwater management strategy for the development includes:

- Re-direction of existing downpipe outlets (from the Council office) to the kerb outlet of Old Port Wakefield Road.
- Collection of roof runoff from the ambulance station / garage, to reduce runoff volume from the site. Roof runoff may be reused for irrigation, cleaning, and use in toilet and laundry facilities.
- A 4kL detention tank will also be provided to ensure that peak runoff rates are the same or less than pre-development rates.
- Underground drainage of the new staff car park will include perforations and granular backfill in the trench to encourage filtration and reduce runoff to Wells Road.

PO 31.2 of the Design GDPs seeks that water discharged from a development site is of a physical, chemical and biological condition equivalent to or better than its pre-developed state.

Surface flows from the staff carpark will pass through an 'Atlan StormSack' trash basket to mitigate pollutant loads prior to discharge to Wells Road. The SMP concludes that the 'the development is unlikely to negatively impact the water quality of site runoff'.

A vehicle washdown area is not proposed for the station. Ambulances will be washed at commercial car wash facilities off-site.

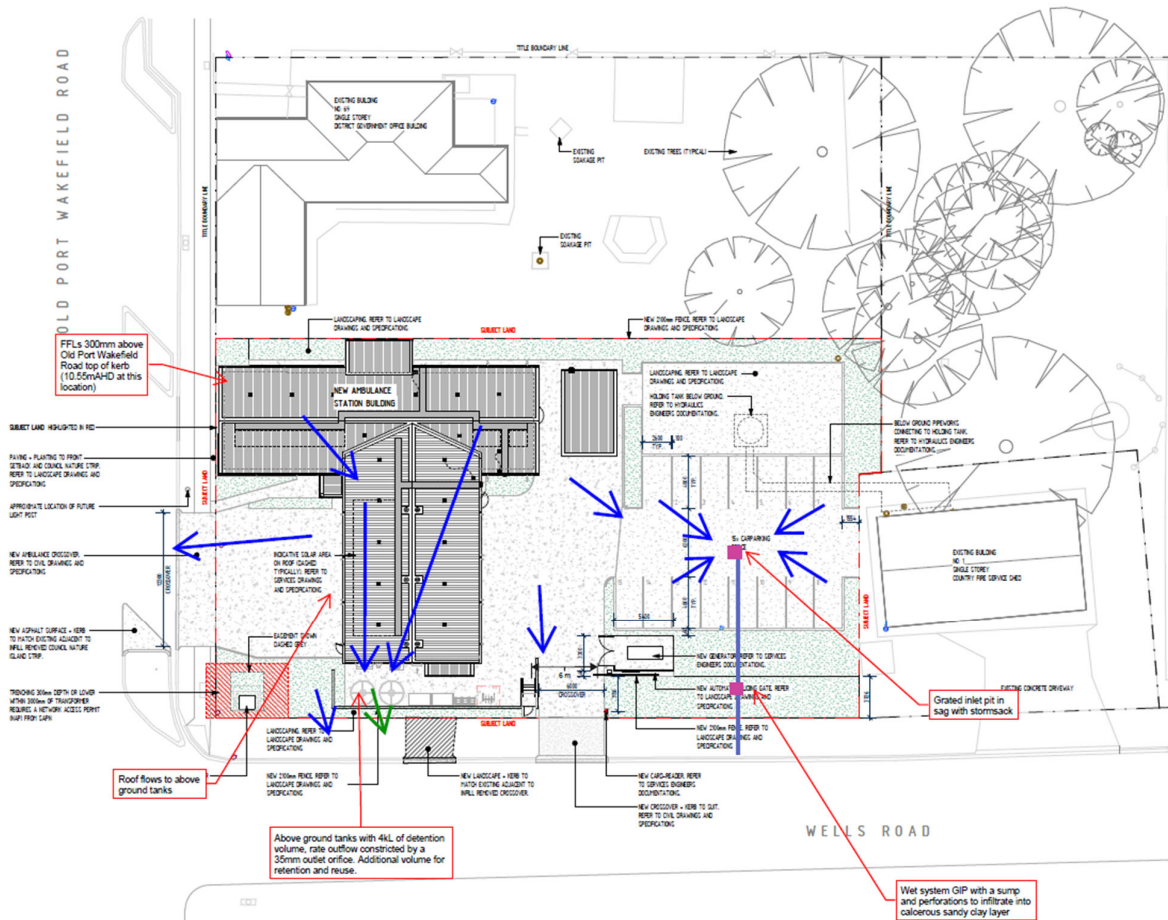


Figure 17: Proposed stormwater management strategy

Wastewater

The proposed on-site wastewater management system for the development is shown in Figure 18. The system has been designed to manage wastewater for both the existing CFS station, and new ambulance station until such time as connection to a CWMS is available. The system caters for 12 staff, with a 9,700L volume tank, which will require pumping out every 15 days.

The on-site system is considered appropriate as a short-term solution, until such time as connection to a CWMS is available. Alano Water is the Licensed Wastewater Entity for Two Wells, servicing the Eden, Liberty and Longview housing estates. The Applicant has advised that Alano Water intends to extend its wastewater network to include the subject site, with estimated availability from mid 2026.

[illegible]

Figure 18: Proposed wastewater management strategy

8.5 Traffic and access

Access

PO 3.1 of the Transport, Access and Parking GDPs seeks safe and convenient access that minimises impact or interruption on the operation of public roads.

The proposed access arrangements for the development are shown in Figure 19.

All vehicles (ambulances and passenger vehicles) will enter the site from Wells Road via a secure (gated) access point. Wells Road currently has minimal through traffic (being a dead-end road) and is a low speed environment. The new access point has been sited with regard for the adjacent land use (CFS Station) per PO 3.4, and the approved town centre development to the west.

Within the site, ambulance and passenger vehicles movements are separated. Ambulances will turn left into the garage (or straight ahead to the standalone carport), whilst light vehicles will turn right into the staff car park.

Light vehicles will exit the site using the same, gated access point to Wells Road. To achieve the required sight lines on Wells Road, Tonkin's recommends the introduction of no-parking controls (yellow lines) either side of the driveway.

Ambulances will exit the site directly onto Old Port Wakefield Road via a wide (12.3m) crossover. The width of this crossover is governed by DHW / SAAS operational requirements, to enable all ambulances to exit the site simultaneously, and to ensure that drivers can safely manoeuvre under pressure. To achieve the recommended sight distance of 69m, some existing on-street car parks will need to be removed, and others replaced with parallel parks.

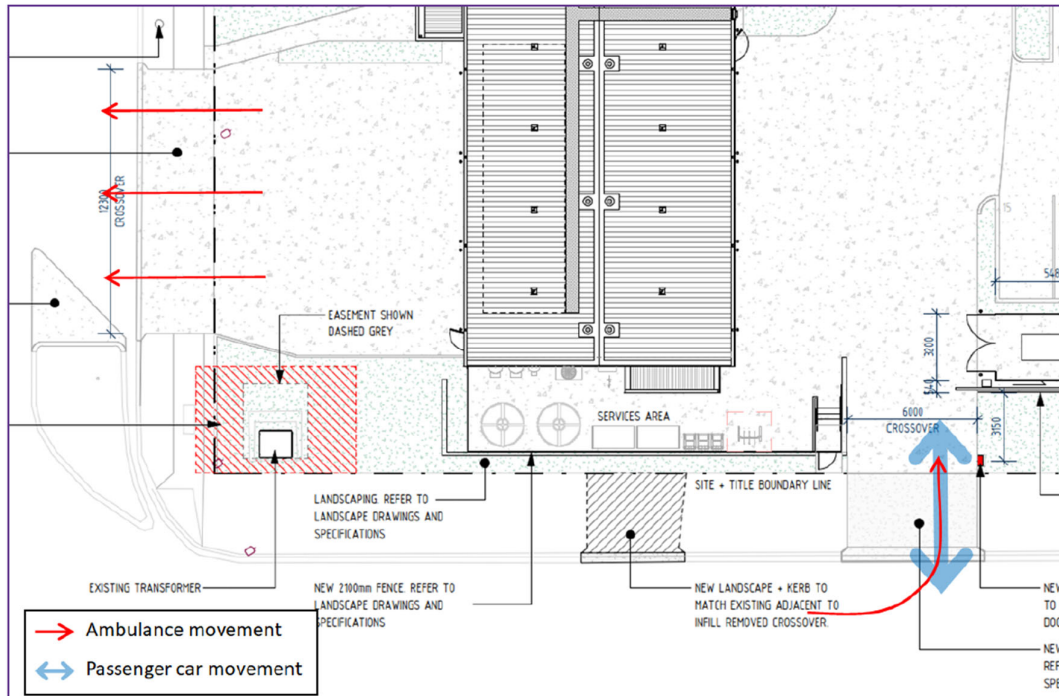


Figure 19: Site Access Arrangements

To meet relevant Australian Standards for the new crossover, the existing kerb build-out will need to be re-shaped as shown in Figure 20.

Council's traffic consultant (MFY) does not fully support Tonkin's recommendations with respect to the removal of car parking (on Old Port Wakefield and Wells Road) or the final design of the kerb build-out shown in Figure 20. These matters can be finalised between Council and the Applicant, noting that these roads are under Council care and control, and relevant approvals may be required under the *Local Government Act 1999*.

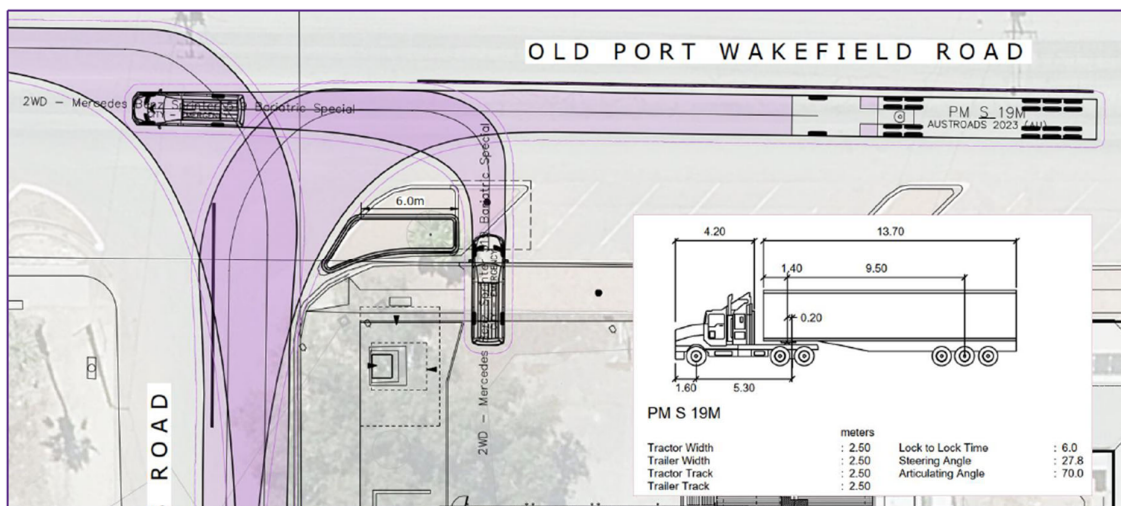


Figure 20: Recommended kerb build-out reshaping

The vehicle crossover points, and internal circulation areas have been designed to cater for the types of vehicles accessing the station. Swept path analysis was undertaken to demonstrate that ambulances can access the site and garage without impediment.

Waste collection will occur from Wells Road, adjacent the bin storage area. Bins will be moved to the roadside for collection.

Traffic Impact

PO 1.1 of the Transport, Access and Parking GDPs seeks that development is integrated with the existing transport system and designed to minimise its potential impact on the functional performance of the transport system.

A Traffic Impact Assessment (TIA) has been prepared by Tonkin Consulting. The TIA conservatively estimates the total number of generated trips as 32 during the peak hour, equating to 1 additional vehicle every 2 minutes. This is considered a relatively small increase which can be accommodated by the surrounding road network. The estimate is based on 12 light vehicles and all 4 ambulances entering and exiting the site during the peak hour. Actual trip generation is expected to be much lower, noting that only 4 paramedic staff will be operational at any one time.

On occasion, more people may visit the site to utilise the training room, which has a capacity of 20 people. Tonkin's TIA states that the generated trips remain well within the network capacity.

Traffic movements on Wells Road are expected to increase with the adjacent town centre development. All heavy vehicle loading and waste collection for the supermarket and specialty shops will occur from Wells Road (up to 19m semi-trailers) along with a click and collect parking area, and access point to patron car parking.

Tonkin's traffic impact assessment does not consider the cumulative impact of traffic movement from the ambulance station and town centre development on Wells Road. Given the low number of vehicle movements generated by the proposed ambulance station, and the non-urgent of nature of movements (on Wells Road), this is not considered to be a significant concern for the ambulance station development.

Parking – Ambulance Station

PO 5.1 of the Transport, Access and Parking GDPs seeks sufficient on-site vehicle parking to meet the needs of the development.

The P&D Code does not specify an off-street parking rate for emergency service facilities. The site user (SA Ambulance) requires at least 15 parking spaces to cater for on-site staff. This is considered sufficient for the facility, catering for the on-duty staff, as well as shift changeovers.

Visitors attending the site for training purposes can be accommodated by on-street parking on Old Port Wakefield Road.

The on-site staff car parking has been designed in accordance with relevant Australian Standards with respect to dimensions.

Parking – Council Offices

Construction of the new ambulance station will result in the loss of existing Council staff and visitor parking. During construction, and until a replacement car park is constructed, alternative on or off-street parking is required.

DIT and SAAS are working with Council to identify potential off-street parking options, which may include the existing car park adjacent the Council Chambers (east of the subject site).

In the event that no alternate off-street parking is available, Tonkin has undertaken a rudimentary assessment of on-street parking for Old Port Wakefield Road (refer Figure 21). A total of 83 parks were identified, within 150m of the Council office. This will reduce to 72 when the on-street capacity is removed to accommodate the new ambulance crossover. Occupancy rates were counted on 8 different days, at unknown times. The data suggests that the on-street parking network on Port Wakefield Road has capacity to absorb the loss of the existing Council car park, even when accounting for the reduction of on-street parks due to the new ambulance crossover.



Date	Occupancy at Council Carpark	Occupancy of On-Street parking
Friday, 23/05/2025	6	27/83
Friday, 07/03/2025	0	18/83
Friday, 10/01/2025	5	30/83
Wednesday, 06/10/2024	8	27/83
Thursday, 25/07/2024	9	9/83
Wednesday, 16/01/2024	9	20/83
Wednesday, 26/07/2023	8	16/83
Tuesday, 04/04/2023	12	11/83

Figure 21: On-street parking capacity

Car Parking Areas

PO 6.1 to 3.7 of the Transport, Access and Parking GDPs provides guidance for the location and design of on-site car parking areas.

The staff car park has been designed in accordance with Australian Standard 2890.1:2004 and is suitable for its intended purpose. All access to the on-site car park is via the secure, gated entrance on Wells Road. Any visitors to the station would need to park on Old Port Wakefield Road and enter the site via foot.

Access from the car park to the station building requires staff to traverse the internal vehicle manoeuvring area. This is expected to be a low speed environment, and potential staff / vehicle conflict can be managed by the user. This may include the installation of internal traffic management devices (e.g. signs, pedestrian crossing) and/or lighting.

The proposal includes a bicycle rack for four (4) bicycles, located west of the garage near the bin storage area. This is considered appropriate, noting that most ambulance staff are expected to travel to and from the site via private vehicle.

8.6 Site contamination

Primary policy matters identified focus on land suitable for its intended use, particularly changes of land use to a more sensitive use.

The application seeks a change of land use from car park and community facility (Scouts group) to an Emergency Services Facility. When considered against the Land Use Sensitivity Hierarchy (LUSH) table in Practice Direction 14, the land use is not considered to be changing to a more sensitive use, as follows:

Existing land use:

- The Scouts facility would be considered a Community Centre = #4.
- A car park is not listed as a land use in its own right; however the existing car park is associated with the adjacent Council offices, which would be akin to Commercial Class 1 (offices) = #5.

Proposed land use:

- An emergency services facility is not specifically identified in the LUSH table, but would be like Commercial Class 1 (offices, consulting room), noting that vulnerable people do not reside in the facility = #5.

Preliminary and Detailed Site Investigation reports were submitted as part of the application, to inform the handling of soils during excavation / construction, and identify potential risks to the environment and/or human health. The reports conclude that concentrations of all analytes are below the health investigation level for an ongoing community land use. No risk is posed to onsite or offsite ecological receptors.

9 CONCLUSION

The application is for a new ambulance station to service the Two Wells township and regions beyond.

The application was lodged by a Crown Agency (DIT on behalf of the Department for Health and Wellbeing - SA Ambulance Service) and processed under the Crown (s131) development assessment pathway of the PDI Act 2016. A s131 assessment has regard for the relevant code provisions, however neither the SCAP nor Minister (as Relevant Authority) is bound by the Code.

The development is a State Government election commitment, and part of a major investment in ambulance staffing and infrastructure across the State. The new station is required to service the Two Wells region, which is experiencing significant population growth. The Greater Adelaide Regional Plan (GARP) identifies Two Wells as a key growth area with large areas of land either being developed; zoned ready for residential development; or earmarked as future greenfield supply.

An emergency services facility is not specifically envisaged in the Township Zone, however the ambulance station will provide an essential service to the local community and the surrounding district. The subject site was selected for its accessibility, proximity to major transport routes, co-location with the existing CFS station, and separation from sensitive land uses.

The scale and design of the main station building is complementary to existing and envisaged built form in the locality with respect to height, scale, materiality and heritage character. The setback of the garage and services area of the facility will assist in mitigating the visual impact of these elements. Landscaping around the site perimeters will assist in softening the built form.

Access, parking and internal manoeuvring areas have been designed to accommodate ambulance and light vehicles. Traffic movements generated by the development are not expected to have a detrimental impact on the adjacent road network.

The Commissioner of Highways did not raise any major concerns with the proposal. The Adelaide Plains Council does support the development, primarily due to the unresolved nature of the replacement car park for Council's service centre.

It is acknowledged that the project requires various facilitatory and related activities, which are separate to this development application. In this regard, the State Government has signalled its intent to work with Council on resolving these matters (with opportunity also afforded through the land sale process and noting it is ultimately up to Council to proceed with any divestment), some of which may require permits and approvals under the PDI Act 2016 or the Local Government Act 1999:

- Transfer of a portion of the subject site (allotment 51) from Council care and control to SA Government ownership.
- A land division application to provide separate title / land tenure for the excised ambulance station site.
- Construction of a replacement car park for Council staff / visitors on Council owned land (adjacent allotment 53).
- Changes to on-street parking and kerbing on Old Wakefield Road, to facilitate the ambulance exit.
- Parking restrictions on Wells Road, either side of the new vehicle crossover.

Pursuant to Section 131 of the *Planning, Development and Infrastructure Act 2016*, and having undertaken an assessment of the application against the relevant provisions of the Planning and Design Code, the application is generally consistent with its provisions for the reasons outlined above.

If no further information is required, and all relevant assessment matters have been considered, this planning report can be endorsed by the SCAP pursuant to 131(14) of the Act, and a formal recommendation provided to the Minister for Planning for their further review and decision.