



**Adelaide
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Council**

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ABN 58 384 968 672

7 July 2025

Reference: D25/27993

Troy Fountain

Manager, Commission Assessment

Department of Housing and Urban Development

Dear Troy,

Section 131(6) Referral Response

I write in relation to the proposed development application for the *Construction of a new single-storey ambulance station with associated car parking and ancillary infrastructure*.

The proposal is located on Crown Land, presently under the care and control of Adelaide Plains Council. The site currently contains the building known as the Two Wells Service Centre, a shed leased to the Two Wells Scouts, the car park for the Adelaide Plains Service Centre and the Scouts, plus some formal and informal landscaped areas. Council has occupied the site and the associated car park since the 1980s.

Adelaide Plains Council, at its Ordinary Meeting held on Monday 24 March 2025, resolved as follows:

RESOLUTION 2025/106

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.”

CARRIED

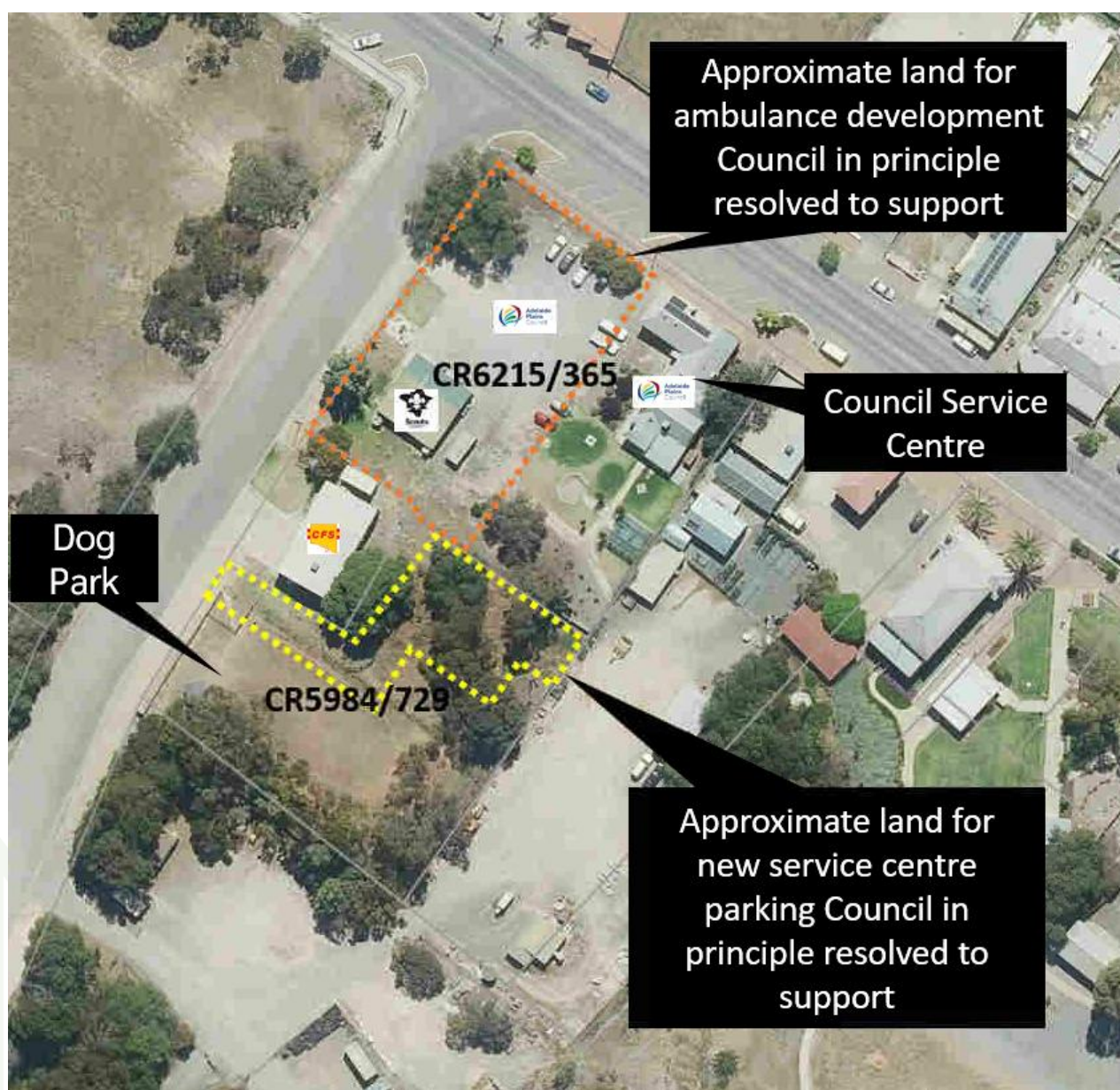


Figure 1 Land used for car park/scouts supported by Council in principle for Ambulance development and also land supported in principle for replacement Council service centre car parking

There appears to be confusion as to the actual site area for this application. Drawings submitted as part of this application show differing information, and the development location in the planning portal shows only a singular location, being Allotment 51 Plan Parcel D73399 (CR 6215/365) highlighted below.

The subject land does not appear to include the adjoining allotments to the south nominated and supported by Council for a future car park. This concern will be covered in further detail.

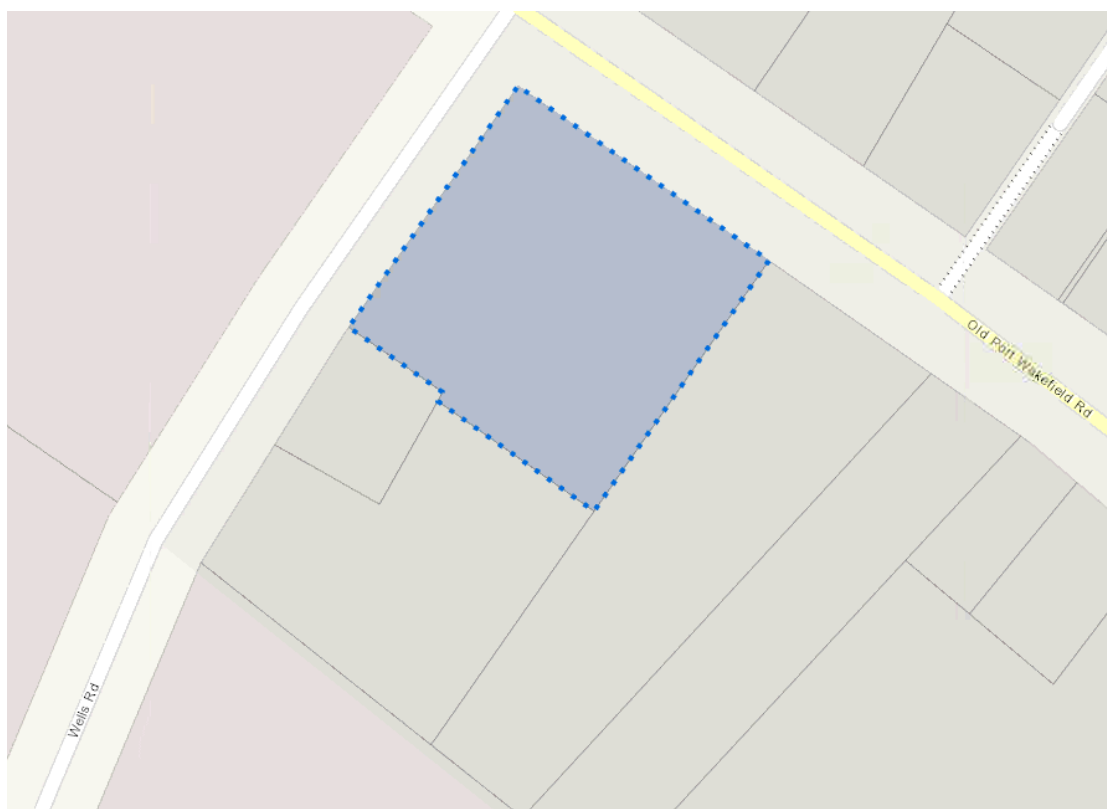


Figure 2 Development location as shown in planning portal

Fundamental Question about the Application's Subject Land

The proposal documentation shows a new car park on adjoining allotment to the south to replace the existing Service Centre car park where the new ambulance station is proposed.

The Planning and Design Code envisages that on-site parking be provided for any type of authorised land use, be it in this case, the ambulance station development itself, or the lawfully established Council Service Centre.

The nature of development does not include the new adjoining car park on an adjoining parcel of land intended to replace the service centre car parking to be built on. This is confirmed under the 'Scope of Application' on page 9 of the planning report submitted.

There is a fundamental issue with a proposed car park on a separate parcel of land with no legal connection or link to the associated land use site. In the absence of a Land Management Agreement, or boundary realignment to merge these parcels of land, this application is at odds with following Code provisions and is not supportable. This matter has been raised with the proponents.



Transport, Access and Parking [Vehicle Parking Rates]

PO 5.1 - Sufficient on-site vehicle parking and specifically marked accessible car parking places are provided to meet the needs of the development or land use having regard to factors that may support a reduced on-site rate such as

- availability of on-street car parking
- shared use of other parking areas
- in relation to a mixed-use development, where the hours of operation of commercial activities complement the residential use of the site, the provision of vehicle parking may be shared
- the adaptive reuse of a State or Local Heritage Place.

Questions about Design and Siting of Flagged New Service Centre Car Park

Whilst not technically part of this application, it is noted that the lodged drawings show a new crossover and access going over a boundary of two allotments, one being under the care and control of the CFS, to a car park with some 16 spaces. This needs more consideration.

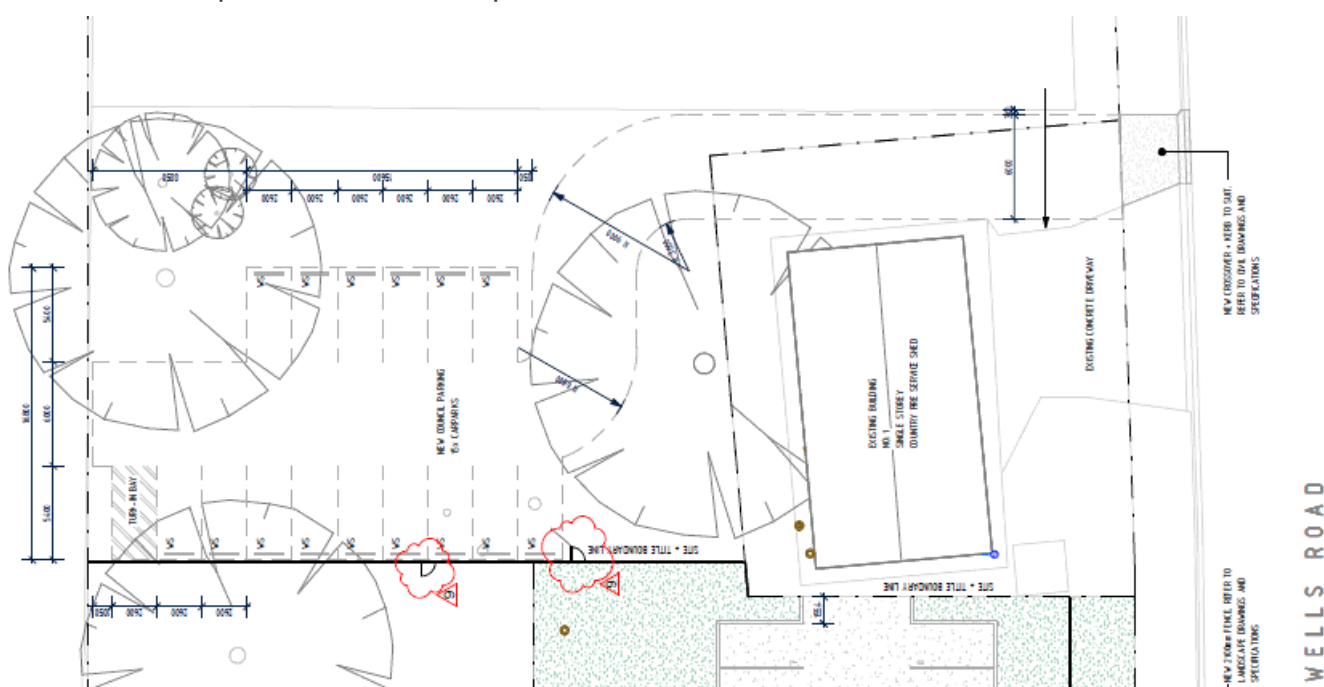


Figure 3 Application drawings show a new crossover and access from Wells Road going over a boundary of two allotments, one being under the care and control of the CFS.



Figure 4 Proposed driveway location from Wells Road partly on CFS land and partly on the dog park

We question the existing car park servicing Council's Service Centre and the Scouts being referred to in the Traffic Impact Assessment as an 'unofficial parking area'. This is incorrect. The car park is sealed car park that is used by Council staff, visitors that attend Council's meeting rooms and offices, as well as the Scouts who have a lease on the site. To reiterate, Council has occupied the building known as the Two Wells Service Centre and the associated car park since the 1980s.

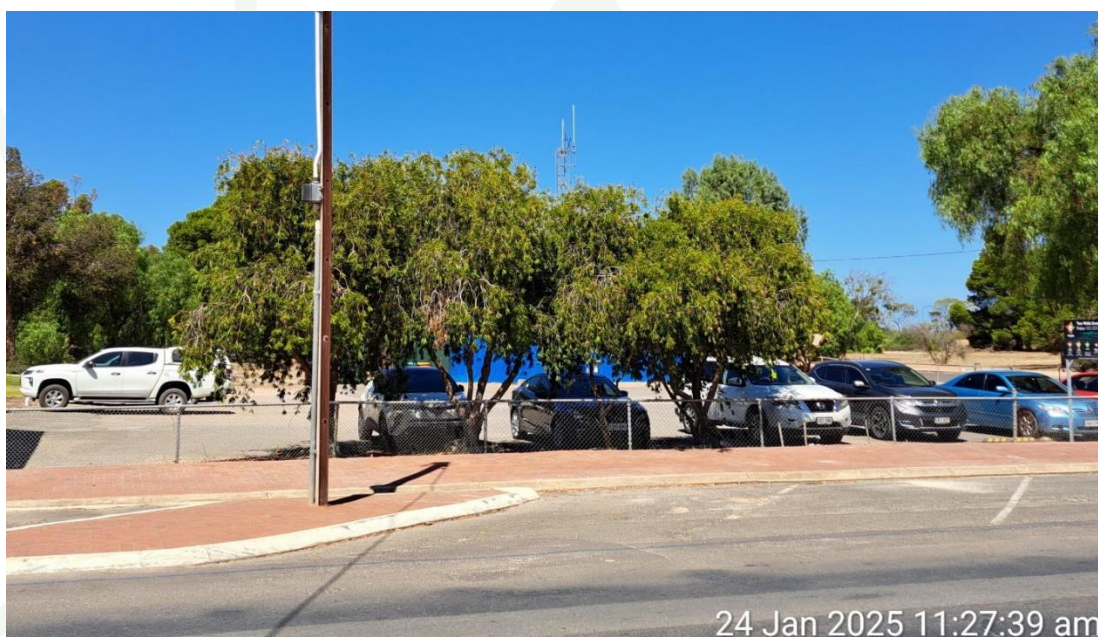


Figure 5 Existing car park with blue building through the trees being Scouts



Notwithstanding it is not included in this proposal, we provide the following comments on the proposed car park design shown on the adjoining allotment to the south.

The proposed carpark layout and design does not provide for sufficient space for the parking and maneuvering for the variety of vehicles and is isolated from the Service Centre building.

The existing car parking area and access point to Wells Road provides onsite parking for Council employees, for customers and visitors to the Council Service Centre, and access for Council maintenance staff with building infrastructure trade vehicles and trucks with trailers to maintain landscaped areas.

Movement of goods will be restricted to and from the Service Centre building as the rear of the site will be land-locked with no vehicular access from Old Port Wakefield Road.

The remoteness of a new carpark from the Service Centre limits passive surveillance of pedestrian movements. This aspect is exacerbated by the existing CFS building which further restricts surveillance from Wells Road and adjoining land.

These risks are at odds with the following Performance Outcomes and needs more consideration.

Safety

PO 2.1

Development maximises opportunities for passive surveillance of the public realm by providing clear lines of sight, appropriate lighting and the use of visually permeable screening wherever practicable.

PO 2.3

Buildings are designed with safe, perceptible and direct access from public street frontages and vehicle parking areas.

PO 2.4

Development at street level is designed to maximise opportunities for passive surveillance of the adjacent public realm.

Transport, Access and Parking [Vehicle Access]

PO 3.1 - Safe and convenient access minimises impact or interruption on the operation of public roads.

PO 3.5 – Access points are located so as not to interfere with street trees, existing street furniture (including directional signs, lighting, seating and weather shelters) or infrastructure services to maintain the appearance of the streetscape, preserve local amenity and minimise disruption to utility infrastructure assets.

PO 3.6 - Driveways and access points are separated and minimised in number to optimise the provision of on-street visitor parking (where on-street parking is appropriate).

Transport, Access and Parking [Vehicle Parking Areas]

PO 6.6 - Loading areas and designated parking spaces for service vehicles are provided within the boundary of the site.

Ambulance Land Use - Design – Movement Impact on the Main Street and Locality

The ambulance development is occurring in a rapidly growing township. In the main street, key changes are the Two Wells Town Centre development, a range of traffic calming works, power line undergrounding, and investigations into a CWMS system.



Figure 6 Key changes underway in the main street. The planned future traffic calming is in Council's proposed budget for 25/26, and the Town Centre development has a planning consent

The proposal does not fall within any of the anticipated land uses listed under the Zones DTS/DPF 1.1. While it provides an essential public service for a growing region, it will function as a specialised operational facility rather than a community-facing business or public access venue. The land use is not considered consistent with the policy intent for this zone, which seeks development that contributes to day-to-day street-level activity, economic vitality, and public engagement.

It is at odds with PO 1.1 – Anticipated Land Uses that seeks to promote a vibrant mix of retail, office, entertainment, and recreation-related uses supplemented by businesses offering services to the local community. DTS/DPF 1.1 provides a specific list of acceptable land uses, including shops, consulting rooms, offices, community facilities, places of worship, and similar low-impact, service-oriented uses.

It is at odds with the PO 1.5 – Streetscape Activation as the development is not designed to contribute to a vibrant and interesting streetscape, as sought under PO 1.5. The built form is vehicle-dominant, with a large expanse of roller doors, limited glazing, minimal public interface, and an overall utilitarian design. The proposal fails to present as a main street-compatible civic or community facility.



In terms of POs 2.1 and 2.2 – Built Form and Traditional Character, the Zone anticipates buildings that reinforce the historic low-scale and finely grained built form typical of main street townships. This includes articulation, detailing, and design references that respond to existing character elements, such as the adjacent historic service centre building to the south.

Council acknowledges that the proposed use of softer grey materials and the inclusion of a brick indented feature wall represent a considered design response that draws from the material palette and detailing of nearby heritage buildings. These elements are supported and considered important in achieving some level of contextual alignment.

However, despite these positive inclusions, the overall built form remains inconsistent with the expectations of PO 2.1 and PO 2.2. The building presents a wide, low-activated frontage with large garage doors, minimal articulation, and an absence of verandahs, recessed entries, or vertical rhythm typically found in traditional shopfronts. The building does not effectively contribute to the continuation of the established main street form and risks undermining the intended character of this zone.

In terms of PO 2.4 – Active Frontage and Passive Surveillance, the proposal does not incorporate meaningful activation or opportunities for passive surveillance.

The frontage is largely dominated by roller doors and blank wall sections, with limited glazing or pedestrian-facing design. This limits visual engagement with the public realm and reduces pedestrian safety and amenity. An active interface with regular openings, windows, or visible building functions is a key policy objective of the zone.

The proposed fence height along Wells Road has increased from an earlier 1.8m to 2.1m. Council does not support this change. The increased height, combined with the requirement to level surface levels with the top of kerb, will result in an excessively high and visually intrusive structure adjacent to Wells Road.

In terms of PO 2.7 – Site Layout and Location of Ancillary Structures, the site plan indicates the location of service areas, plant equipment, and garaging on or near the street frontages, rather than being positioned behind the main building. This arrangement detracts from the intended main street activation, contrary to PO 2.7, which seeks to maintain visual interest and activity along the public interface by locating outbuildings to the rear.

In terms of PO 2.8 – Pedestrian Connectivity, the development interrupts the pedestrian network and offers little in the way of footpath continuity or clear connections to adjoining public land.



Independent Traffic Advice

Melissa Mellen, Director of MFY, peer reviewed the proposal on behalf of Council. Melissa provides traffic advice for Hickinbotham, the proponent of Two Wells largest residential development. Melissa also provides advice for Leyton Property, proponents of the Two Wells Town Centre development immediately to the north of the subject land. Melissa's expertise and local knowledge is significant.

The proponent's traffic report contains an alternate access design. That alternate access design was prepared by MFY at the request of Council administration. That alternate access design is not the access approach proposed in the development application.

Melissa's advice on the proposed development application is as follows.

'I have completed a review of the Traffic Impact Statement relating to the proposed Ambulance DA and provide the following advice:

- The egress for emergency vehicles is within a prohibited access zone in accordance with AS/NZS2890.1:2004. If the egress is to be maintained to Old Port Wakefield Road it should be modified to comply with this requirement as currently it would result in a crash risk due to the proximity with the adjacent intersection.*
- The turn paths have not been completed with the longest ambulance (as documented in the SAAS Building requirements).*
- The sight distance has not been correctly measured. The measurement is not to the outside of the traffic lane but rather to the vehicle within the lane. The extent of parking restriction identified will not be required.*
- The location of the access control would require drivers to enter on the incorrect side of the two-way access. While this has been justified in the report due to low volumes, the movement of itself is contrary to the requirements of the Australian Road Rules and hence it is not appropriate to provide a solution for a development which in effect requires that drivers breach the road rules.*
- The travel time increase has not been justified. The turning requirement from Wells Road to Old Port Wakefield Road is the same as directly from the site to Old Port Wakefield Road. The DA for the adjacent land identifies low volumes on Wells Road (and in any event a vehicle leaving in an emergency would have right of way). The actual variation in travel time should be calculated and documented.'*

Melissa's review flags numerous matters that require further design work and reconsideration.



Amongst these, the width of the proposed new crossover to Old Port Wakefield Road, and the loss of on street parking spaces, is not supported. A 12.33m wide crossover is an extraordinary dimension for a crossover of any type and is above and beyond any width specified in Australian Standards or the Planning and Design Code. While a swept path analysis has been included (Appendix B of Traffic Impact Statement) to demonstrate ambulance access, this analysis must be revised based on a reduced-width crossover.

Furthermore, the line of sight issue for drivers exiting the proposed building needs review, including the proposed loss of valuable on street car spaces which is unjustified.

Council understands that the proposal seeks to accommodate three ambulance vehicles exiting onto Old Port Wakefield Road simultaneously. This arrangement is not supported.

Car parking, driveways, and service infrastructure dominate the site layout, limiting opportunities for meaningful pedestrian linkages across the zone.

Further design work is required to address the crossover width and address Council's concerns prior to any approval. The Traffic Impact Statement does not include commentary or justification for this proposed arrangement, and this must be addressed.

Wastewater

The application plans assume that the proposal has access to a sewer line within Wells Road; this is incorrect. The development is reliant on a proposed pump station, which requires a portion of the site to be made available for its construction. This has not been accounted for in the current plan set.

The locality does not have a local wastewater system. As such, each site is required to manage wastewater on site.

There are discussions around wastewater infrastructure being constructed on this land to accommodate the pump station for a proposed CWMS system for both the original Two Wells township including the approved major development in the form of a shopping centre directly opposite the site on Wells Road). However, at this time, this is not in place.

Council has concerns related to earthworks and footings for the new building being in very close proximity to an existing wastewater system in the form of an underground septic tank that services the Service Centre.

The lodged plans need to be amended to show land for what could be described as an interim wastewater solution, how the development could work for the proposed CWMS system for Two Wells



township, and also with respect to the existing underground septic tank for the Service Centre. These refinements should satisfy the following POs. The proponent is aware of these matters.

On-site Waste Treatment Systems

PO 6.1

Dedicated on-site effluent disposal areas do not include any areas to be used for, or could be reasonably foreseen to be used for, private open space, driveways or car parking.

PO 12.1

Development is connected to an approved common wastewater disposal service with the capacity to meet the requirements of the intended use. Where this is not available an appropriate on-site service is provided to meet the ongoing requirements of the intended use in accordance with the following:

it is wholly located and contained within the allotment of the development it will service

in areas where there is a high risk of contamination of surface, ground, or marine water resources from on-site disposal of liquid wastes, disposal systems are included to minimise the risk of pollution to those water resources

septic tank effluent drainage fields and other wastewater disposal areas are located away from watercourses and flood prone, sloping, saline or poorly drained land to minimise environmental harm.

PO 12.2

Effluent drainage fields and other wastewater disposal areas are maintained to ensure the effective operation of waste systems and minimise risks to human health and the environment.

Stormwater

Stormwater must be managed onsite and must not discharge directly into the street.

‘Section 2.2 – Surface Flow Management and WSUD Considerations (Page 6, Stormwater Management Plan):

- Surface flow within Lot 51 Old Port Wakefield Road should be directed to landscaped areas, as this will provide some infiltration to reduce runoff volumes prior to discharge to Wells Road. ‘*

Comment: The current design does not reflect this approach. Instead, stormwater is collected from the proposed car park via a spoon drain and grated inlet pit and discharged directly into Wells Road — this is not supported by Council.

- ‘Surface flow from the new car park at the rear of 1 Wells Road will be directed to the adjacent dog park while avoiding concentration of flow. High initial losses parameters for the*



soil from ARR Data Hub indicate that the dog park soils will absorb a relatively high amount of moisture during brief high-intensity rainfall events. Geotechnical investigation borelogs from Lot 51 support this, indicating the top one metre of soil is expected to be free draining calcareous gravelly/sandy soils. ‘

Again, Council does not support this approach. All stormwater must be managed within the site boundaries.

Stormwater from the existing office building must also be managed onsite and must not cross property boundaries. An alternative solution is required.

Section 4.3 – Discharge from 65 Port Wakefield Road (Page 12, Stormwater Management Plan):

Stormwater systems must be designed and constructed independently for each land parcel. Shared systems spanning property boundaries are not supported.

Council does not support stormwater systems that cross allotment boundaries without formal legal agreements. The proposal must demonstrate that stormwater can be lawfully contained and discharged within the development site to ensure long-term functionality and compliance.

Landscaping

We advise the following in relation to landscaping and vegetation:

- Athel pine listed for retention on Wells Road should be removed (declared weed)
- Suggested *Eucalyptus camaldulensis* (River Red Gum) not to be planted in close proximity to the Service Centre Office due to concern of future issues
- Council staff carpark - plan shows no indication of a footpath to connect the carpark with the existing Service Centre Building. Walking onto Wells Road then Old Port Wakefield Road isn't suitable. A direct link to the rear of the Service Centre should be designed and constructed
- Plan shows no indication if the existing fence will be removed between the Office and proposed staff carpark



- Plantings should be added for parking shade on the western side of Council staff carpark (3-5) trees
- Removal of the large Peppertree located on the corner of Wells Road and Old Port Wakefield Road may raise community concern given it's significant size, age and site history
- The proposed plant species are acceptable

Land Division and Rededication

Council is unaware of any development application to facilitate changing the Crown dedication of land, or any land division or boundary realignment application at the time of this report.

Scouts SA

There is also a lease on the land for Scouts SA. Parallel with this application and reflecting the in principle Council resolution of 24 March, Scouts SA, SA Ambulance and Council officers are working on options to rehome Scouts elsewhere. This is proceeding but is not fully resolved as yet, with the Scouts continuing to currently operate on the subject land.

I take this opportunity to note SA Ambulance and Council officers have had numerous discussions which are ongoing, and I trust the above response will assist the Minister.

Kind Regards,

Josh Banks
Assessment Manager

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22 August 2025
Reference: D25/36760

Troy Fountain
Manager, Commission Assessment
Department of Housing and Urban Development

Dear Troy,

Section 131(6) Referral Response

Further to our initial response dated 7 July 2025, and in response to the revised submission from URPS dated 11 August 2025, Council provides the following comments:

Loss of on-site car parking

There are no ongoing discussions between DIT and Council in relation to the relocation of Council's car parking area, as DIT are not a stakeholder.

There have been conversations between Council and SAAS regarding financial contributions towards a new car park, but at the time of this report, no agreement or conclusion has been reached in this regard.

We remain firm on the view that it is a fundamental planning issue to remove a car park with an associated, existing land use, and to not consider and develop a replacement car park.

I reiterate that the Planning and Design Code envisages that on-site parking be provided for any type of authorised land use, be it in this case, the ambulance station development itself, or the lawfully established Council Service Centre.

The development does not include the new adjoining car park on an adjoining parcel of land intended to replace the service centre car parking to be built on.



This remains a fundamental issue with a proposed car park on a separate parcel of land with no legal connection or link to the associated land use site. In the absence of a Land Management Agreement, or boundary realignment to merge these parcels of land, this application is at odds with following Code provisions and is not supportable.

Transport, Access and Parking [Vehicle Parking Rates]

PO 5.1 - Sufficient on-site vehicle parking and specifically marked accessible car parking places are provided to meet the needs of the development or land use having regard to factors that may support a reduced on-site rate such as

- availability of on-street car parking*
- shared use of other parking areas*
- in relation to a mixed-use development, where the hours of operation of commercial activities complement the residential use of the site, the provision of vehicle parking may be shared*
- the adaptive reuse of a State or Local Heritage Place.*

Independent Traffic Advice

Melissa Mellen, Director of MFY, has peer reviewed the latest changes to the proposal on behalf of Council. Her latest comments are as follows:

- While I accept that the spaces immediately adjacent the crossover need to be removed, I do not accept that the additional five spaces need to be converted to parallel spaces. The line of sight drawn by Tonkin is at the rear of the spaces where most parked vehicle will not extend to. The Australian Standard indicated the measure to the edge of frontage road Tonkin has interpreted this to be the rear of the spaces. This is not correct. The edge of the frontage road is the edge of the travel lane. The adjacent traffic lane is very wide because it incorporates a reversing area behind the spaces required by AS2890.5 (note this would be the superseded version of AS2890.5 relevant when the spaces were installed). The measurement should assume a 3.5m lane wide measured from the centreline as the edge of frontage road;*
- The proposed modification to the island adjacent the Wells Road intersection does not mitigate the non-compliance with AS/NZS2890.1 in respect to the prohibited access zone. The measurement is 6.0m from the tangent point where the two carriageways intersect. While I do not endorse simultaneous exit movements of vehicles due to the high crash risk this represents, I am confident there is a solution that will provide for this to be achieved outside of the prohibited access zone. It is important this is resolved satisfactorily as it impacts safety for road users at the intersection of Wells Road and Old Port Wakefield Road;*



- *I do not accept the argument in relation to the addition response time without actual travel time information. There will be limited access along Wells Road for the development on that site and the emergency response priority will provide for direct access to both roads. The reasoning is speculative and has likely misinterpreted the future use of Wells Road. That said, the prohibited access and parking issue can probably be resolved which would reduce the concern for egress directly to the highway;*
- *I do not accept that No Parking restrictions need to be provided on Wells Road. AS/NZS2890.1 refers to permanent sight obstructions in the hatched zone (a parked car is not a permanent sight obstruction). The Standard does indicate that parking may need to be restricted but in this instance the wide road means that there will be sufficient distance for exiting drivers to see past vehicles. Further, the measurement has been based on the distance at a speed of 50km/h which is much higher than vehicles will be travelling around the corner (if the measurement extends to private land on the opposite side of the road, indicating that this is where the vehicle is approaching from, it is strong indication that the speed assumption is incorrect);*
- *It may be illustrative only but it is essential that vehicles enter on the correct side of the two-way crossover on Wells Road. It is not acceptable to have head-on collision potential at the crossover.*

It is important to understand that while emergency services do require priority and safe means of egress, this does not then mean that the safe movements and functionality of all other road users should be compromised. While I do not accept the analysis relating to the travel time on emergency response or the reasons provided for this, other issues could be resolved with some minor design changes.

Kind Regards,

Josh Banks
Assessment Manager

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