

11 August 2025

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Planning and Land Use Services  
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Sent via email to: [laura.kerber@sa.gov.au](mailto:laura.kerber@sa.gov.au)

Dear Laura

## Response to Council Referral Comments – Crown DA 25013042

URPS continues to act for the Department for Infrastructure and Transport (DIT), the Applicant for the above application.

This application is for Crown Development and was referred to Adelaide Plains Council (Council) for comment.

This letter provides a response to Council's referral comments dated 7 July 2025. The following revised documents are attached:

- Plans prepared by Grieve Gillett Architects (**Annexure A**).
- Traffic Impact Assessment prepared by Tonkin (**Annexure B**).
- Wastewater Management details prepared by Secon (**Annexure C**).
- Landscape Plan prepared by WAX (**Annexure D**).
- Stormwater Management Plan prepared by Tonkin (**Annexure E**).

### Summary of Referral Response

Matters raised in Council's referral response can be summarised under two categories:

- Unrelated matters
- Matters relevant to the assessment of DA 25013042

## Unrelated Matters

Council's referral response included comments which in our view, are unrelated the assessment of this application. These matters either consider land beyond the Subject Site of this application or are outside of the remit of matters that Council is able to comment on. They should not carry any weight in the Crown assessment process.

## Subject Site

The Subject Site for this application is identified as a portion of 69 Old Port Wakefield Road, Two Wells (CR6215/365).

This means that the remaining portion of CR6215/365 and separate allotments to the south do not form part of the application. This is confirmed in our Planning Report.

To avoid any further confusion, updated plans have been provided by GGA which more clearly delineate the Subject Site (see **Annexure A**).

We do acknowledge that the development of an Ambulance station on the Subject Site is one part of broader project considerations. We offer the following comments for the purpose of clarity:

- **Council car park relocation**

DIT and Council are in ongoing discussions regarding the relocation of Council's car parking area.

Land being part of CR5984/729 has been identified for this purpose. This was resolved as a separate matter at Council's Ordinary Meeting held on Monday 24 March 2025. This is a separate title and not part of the Subject Site for this application.

This land (like CR6215/365) is under the care and control of Council. This means the legal connection or link between the remaining portion of CR6215/365 and CR5984/729 is a matter for Council's consideration. Both portions would remain under Council's management. The same can be said for the appropriate location for a new crossover on Wells Road to service the future car parking area.

- **Land Division**

The Subject Land (being a portion of CR6215/365) will be transferred to the care and control of the SA Ambulance Service (SAAS), held under the Minister for Health and Wellbeing. A land division will be required to facilitate the transfer of only the Subject Site.

- **Scouts SA Relocation**

There is an existing shed on the Subject Site used by the Scouts. While this was not part of the Council resolution, SAAS have been in continued conversations with Council to determine a suitable relocation site. SA Health have committed to funding the purchase of a replacement storage container which will be installed on the agreed new location.

### Exclusions from Crown Assessment

Crown Development is assessed under a different legislative framework to that of other development. This is reflected in Section 131 of the *Planning, Development and Infrastructure Act 2016* (the PDI Act).

Section 131 of the PDI Act is silent as to what a Crown Development is assessed against. This contrasts with Section 102 applicable to more typical development that expressly requires assessment against the Code (s.102(1)(a)).

This difference exists so that Crown Development has greater flexibility to satisfy a range of government policy imperatives. This also ensures an assessment of Code policy does not delay the delivery of essential services and infrastructure, such as this Ambulance Station.

It does not mean Code policy is irrelevant in the assessment of Crown Development. It is simply one of many considerations in the assessment.

This provides that the Minister may resolve to approve a Crown Development despite an inconsistency or variation with the Code.

While this application is not specifically required to consider Code policy, the development provides a considered design response for the locality which has turned its mind to Code policy. This was undertaken with respect to built form and character, building height, setbacks, streetscape appearance and landscaping.

### Matters relevant to the assessment of DA 25013042

The application has been referred to Council for comment on any matter specified under the sub-regulation, as follows:

**23—State Planning Commission (section 94)**

...

**(2) If the Commission is the relevant authority under section 94(1) of the Act—**

...

**(b) in any case relating to development within the area of a council—the Commission must give the chief executive officer of the council for the area in which the development is to be undertaken a reasonable opportunity to provide the**

*Commission with a report (on behalf of the council) on any matter specified under subregulation (3) that is relevant to the particular case (but if a report is not received by the Commission within 15 business days after the request is made to the chief executive officer, or within such longer period as the Commission may allow, the Commission may presume that the chief executive officer does not desire to provide a report).*

*(3) The following matters are specified for the purposes of a report under subregulation (2)(b):*

*(a) the impact of the proposed development on the following at the local level:*

*(i) essential infrastructure;*

*(ii) traffic;*

*(iii) waste management;*

*(iv) stormwater;*

*(v) public open space;*

*(vi) other public assets and infrastructure;*

*(b) the impact of the proposed development on any local heritage place;*

*(c) any other matter determined by the Commission and specified by the Commission for the purposes of subregulation (2)(b).*

Matters raised by Council that are relevant to the assessment of this application are:

- Traffic
- Wastewater
- Stormwater
- Landscaping

## **Traffic**

Tonkin has provided a revised Traffic Impact Assessment, see **Annexure B**.

This directly responds to Council's referral comments. Notably, Tonkin have provided further detail regarding:

- Sightline assessment to Old Port Wakefield Road and impacts to existing on-street parking (quantified).
- Justification for proposed driveway width and simultaneous exit requirements.
- Confirmation that the 519 Bariatric vehicle is the largest vehicle (longest wheelbase) which will access the site.

References to the replacement car park outside of the Subject Site has also been removed from the report.

### Wastewater

The project team understands that a sewer connection for the subject land is likely in the near future. Alano Water have confirmed plans for sewer infrastructure in the locality, including a pump station located to the south of the subject land. This connection will not be available until mid-2026.

In the interim (or in the event this connection is not available), the proposal considers an on-site wastewater solution. Secon have provided revised plans which show this solution, see **Annexure C**.

This confirms the provision of on-site holding tanks and a wastewater management strategy for collection.

Further, the location of Council's existing septic system infrastructure has been confirmed. This has been shown on amended plans and is positioned outside the Subject Site, see **Annexure A**.

A 6.5m clearance is provided between the infrastructure and the proposed boundary of the Subject Land. The Ambulance Station building has been setback a further 2.6m from the proposed boundary line adjacent to this infrastructure. This ensures the footings of the building will not impact Council's existing infrastructure.

### Stormwater

A revised Stormwater Management Plan (SMP) has been prepared by Tonkin, see **Annexure E**.

This responds to some inconsistencies identified in the previous SMP and responds to Council's comments.

Tonkin have also provided a solution for re-routing Council's stormwater to Old Port Wakefield Road. This ensures stormwater infrastructure from Council's office will not traverse the Subject Site.

### Landscaping

Amendments to the plans results in the removal of the Athel Pine fronting Wells Road, see **Annexure A**.

WAX have also amended the Landscape Plan for the site, see **Annexure D**. In response to Council's referral comments, Eucalyptus camaldulensis has been removed from the planting schedule and tree planting will not occur within proximity of the Council office.

The Landscape Plan has also been revised to only include the Subject Site for clarity.

## **Conclusion**

This development will deliver essential infrastructure to an under-serviced area experiencing significant growth. This is a key priority of the State Government. The delivery of an Ambulance Station in Two Wells has a critical delivery timeline.

Given this time pressure, our preference is that you can proceed to a delegated decision without the need to have the matter heard at the State Commission Assessment Panel.

The Subject Land has been selected as a strategic location and the development provides a considered design response for the locality.

Positive changes have been made and additional clarification provided, in response to Council's referral comments. We now seek that you move forward with the assessment of the application.

We confirm that we can be available to attend the next State Commission Assessment Panel meeting in support of the development and respond to any questions from Panel Members. We seek that this be tabled for the next available meeting, should you not be able to issue a decision under delegation.

Please contact me on 8333 7999 if you have any questions.

Yours sincerely



**Matilda Asser**  
Consultant

11 August 2025

Laura Kerber  
Project Lead, Crown and Impact Assessment  
Planning and Land Use Services  
Level 10, 83 Pirie Street  
Adelaide SA 5000

Sent via email to: [laura.kerber@sa.gov.au](mailto:laura.kerber@sa.gov.au)

Dear Laura

## **Response to Informal Request for Further Information – Crown DA 25013042**

On 18th July 2025 Candy Aung and I met with you to discuss the status of this application. During this meeting you informally requested further information on several matters related to the application.

This letter provides a response to those queries.

### **Alternative Sites**

You sought further background on the preliminary site investigation stages of this project. As confirmed in our Planning Report, a number of alternative sites were considered. Site suitability investigations were undertaken by the Department of Infrastructure and Transport (DIT) and the South Australian Ambulance Service (SAAS) Teams.

Adam Daly of SA Health has confirmed the following:

- *“A number of sites were considered as the potential location around the township of Two Wells including other council owned sites, land owned by the Catholic Church and other government agencies.*
- *Two sites in private ownership were also considered as potential options.*

- *These sites were ruled out through discussions with Council, SAAS and Renewal SA for various reasons including:*
  - *Other future uses proposed by council/private developer*
  - *Soil conditions or lack of services*
  - *Within flood plains of township*
  - *Private owned properties/on market were ruled out due to constraints of PCC114 and inability to compete with local developers*
  - *Timeframes in acquiring private land can be long*
- *This site was selected due to:*
  - *Central location within Two Wells.*
  - *Access to main thoroughfare roads in and out of Two Wells.*
  - *Fronting main road meaning quicker access to main thorough fare roads.*
  - *Not within flood plain.*
  - *Access to service connections.*
  - *Close proximity to CFS, Council and other town amenities.*
- *Noting DHW [Department of Health and Wellbeing], SAAS and DIT have limited amount of land to acquire.*
- *Acquiring private land is difficult."*

### Interim Council Parking

You sought further information on potential interim car parking solutions for Council staff during construction of the Ambulance Station and new car park on land to the south.

While this falls beyond the considerations of this planning application, DIT and SAAS are continuing to work with Council to provide appropriate interim parking options. The priority will be to provide off-street parking options. This may include use of an existing car parking area adjacent to the Council Chambers.

In response to your comments, Tonkin has also provided an assessment of the existing on-street parking availability within proximity of the Council office, see **Annexure A**. This confirms there is sufficient capacity for staff to utilise on-street parking during the construction period.



## Conclusion

This additional information has been provided to inform you and members of the State Commission Assessment Panel, on the background of the project and considerations of the project team beyond the scope of the planning assessment.

Please contact me on 8333 7999 if you have any questions.

Yours sincerely



**Matilda Asser**  
Consultant



**From:** Trent Phillips  
**To:** Matilda Asser  
**Cc:** Kaitlin Asser; Aung, Candy (Health); James Nuanki; waynes; Foulis, Bryce (Health); Crammond, Keith (Health)  
**Subject:** Two Wells Ambulance Station - on-street & council parking demand study  
**Date:** Wednesday, 23 July 2025 2:43:50 PM  
**Attachments:** image003.png  
7c1f05a4-5e66-433e-82eb-2f010c3400e1.png  
63e6eb6b-9abe-4bdb-871f-06742b48f3f5.png

Hi Matilda,

As requested, Kaitlin has undertaken a carpark demand study based on available aerial imagery from 2023-2025 (8 images).

There are around 83 on-street spaces on Old Port Wakefield Road around the council office on Old Port Wakefield Road. It is noted that when the ambulance station is constructed, the capacity would potentially reduce from 83 spaces to 72.



Based on aerial images extracted from Nearmap and Metromap, here are the parking occupancy at the existing Council Carpark and on street during weekdays when the Council office was operating.

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, 09/10/2024	8	27/83
Thursday, 25/07/2024	9	9/83
Wednesday, 10/01/2024	9	20/83
Wednesday, 26/07/2023	8	16/83
Tuesday, 04/04/2023	12	11/83

The results from the table suggest that the on-street parking is expected to have sufficient capacity to absorb the parking demand from the council staff as an interim measure, when the council carpark is removed, even when the on-street parking capacity is reduced from 83 to 72.

Regards,  
Trent

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## Memorandum

**To**

**From** Tonkin

**Date** 26 August 2025

**Job Number** 241697

**Subject** Response to MFY Comments

This memo has been prepared to respond to comments made by MFY regarding the Traffic Impact Assessment issued by Tonkin in April 2025.

- 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;*

As reiterated previously, the edge of frontage road as defined by Figure 3.2 in AS 2890.1 is the edge of the live traffic lane. This is illustrated in the figure below.





MFY's assertion that vehicles tend to edge forward when parking in angled bays does not sufficiently justify shifting the edge of the frontage road to meet sight distance requirements. The angled parking spaces are clearly delineated by built-out kerbs and linemarking, and cannot be redefined based on assumed driver behaviour. Drivers are entitled to park up to the edge of the designated parking bay, even if this places their vehicles near to the live traffic lane. Accordingly, the sight distance assessment must consider the worst-case scenario.

Furthermore, drivers should be discouraged from encroaching onto the footpath, as this can obstruct pedestrian movement and compromise pedestrian safety.

Regarding the traffic lane width, while the lane exceeds 3.5m, this reflects the existing road condition. Drivers are entitled to use the full extent of the marked traffic lane. Unless the road is physically realigned to narrow the lane, the sight line requirements cannot, and should not, be adjusted to suit particular narratives.

In conclusion, the sight line assessment has been undertaken based on the current road layout and conditions. It should not be modified to avoid parking removal requirements, as doing so would compromise safety.

- *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;*

The proposed modification of the built-out kerb has been designed to maintain the current accessibility of the intersection of Old Port Wakefield Road and Wells Road while satisfying the 6m clearance requirement. It is unclear what MFY meant with "simultaneous exit movements", as the operation of ambulances exiting from Old Port Wakefield Road does not directly relate to the proposed kerb built-out modification.

If Council/MFY think that there exists a better alternative, that satisfies best practice road safety principles, can this be provided for Tonkin to consider.

- *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;*

As discussed in 241697M001A, this study cannot be completed without data on emergency vehicle response times along Wells Road and Old Port Wakefield Road. The TIA report has also addressed this.

- *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 has been responded earlier that the edge of the frontage road cannot be adjusted because of the wide traffic lane width. This can only be considered when the road is realigned and the traffic lane width is changed permanently, physically preventing vehicles from using the current full traffic lane width.

The speed limit along Wells Road is 50km/hr. Unless sufficient evidence and traffic data is provided, demonstrating that vehicles are consistently travelling at a speed significantly lower than 50km/hr, the sight distance requirement cannot be shortened for safety reasons.

- *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.*

Please refer to TIA Section 3.2, where we have discussed that the risk of head-on collision is extremely low due to the restricted site access, the sliding gate control, and that it is a standard practice of SA Ambulance Service which is implemented across many other sites.