FABRIC
PLANNING + DEVELOPMENT

May 31, 2026

Ms Joanne Reid
The Department for Housing and Urban Development
Via: The PlanSA Portal

Dear Joanne,

APPLICATION 25040461

I have been instructed by the Applicant, oKiN Capital Pty Ltd, to respond to the City of Holdfast Bay's (**the Council's**) technical comments. These comments relate to Application 25040461 and form part of the Council's referral response by letter dated February 13, 2026.

My responses are set out numerically below.

1. Critical Flood Risk – Finished Floor Level (FFL)

In response to Point 1, I have since been advised by the Applicant's Civil Engineer, Mr Jake Sleeman of INNOVIS, that "the site is not subject to flooding, with the nearest mapped flood extent located within the road corridor adjoining 2 Patawalonga Frontage, Glenelg North."

Mr Sleeman has also confirmed that "the proposed finished floor level has been set 800 millimetres above the level of the site's primary boundary, thereby providing a minimum freeboard of 300 millimetres above the applicable coastal flood level."

Accordingly, the proposed development satisfies the relevant requirements of the Council's Stormwater Policy and is appropriately designed to mitigate flood risk.

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2. Stormwater Management Requirements

In response to Point 2, I have since been advised by Mr Sleeman that "the proposed stormwater system has been designed to limit post-development discharge during the 10-year ARI Event to 10 litres per second via an 11 cubic metre on-site detention tank, consistent with Section 3.2 of the original Stormwater Management Plan."

Mr Sleeman has also confirmed that "the proposed driveway peaks at 300 millimetres above the top of kerb level, thereby exceeding the minimum clearance requirement."

3. Traffic and Access – Pedestrian Safety, Sightlines and Ramp Functionality

Points 3.1 to 3.4, inclusive, have been addressed, in writing, by the Applicant's Traffic Engineer, Mr Ben Wilson of CIRQA. Mr Wilson's response is appended to this letter.

4. Waste Operations – Practicality of Kerbside Collection

Points 4.1 and 4.2 have also been addressed, in writing, by Mr Wilson (see Pages 4 to 6, inclusive, of Mr Wilson's response by letter dated April 29, 2026).

5. Water Pressure

The Applicant has, together with its Services Engineer, Mr Mark Chmielewski of BCA Engineers, engaged with the South Australian Water Corporation and is acutely aware of the existing water supply constraints affecting the site and surrounding locality, including the implications for firefighting.

In response, the proposed development has been specifically designed to incorporate on-site water storage tanks, together with a dedicated booster pump system located within the basement. This arrangement will enable water to be stored during periods of lower network demand and subsequently pumped for use during periods of peak network demand, including for firefighting purposes, where required.

Accordingly, the proposed system will ensure that adequate water pressure and supply are available to satisfy the proposed development's fire safety requirements, while avoiding any additional burden on, or diminution of pressure within, the existing mains water supply network.

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I trust that you now have everything that is reasonably required to complete your assessment of Application 25040461.

Yours sincerely,

Fabian Barone
Director

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29 April 2026

Mr Fabian Barone
FABRIC
Level 5, 33 Pirie Street
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Dear Fabian,

PROPOSED APARTMENT BUILDING
3 PATAWALONGA FRONTAGE, GLENELG NORTH (APP ID: 25040461)

I refer to the proposed apartment building at 3 Patawalonga Frontage, Glenelg North. As requested, I have reviewed the Referral Response received from the City of Holdfast Bay and provide the following comments in respect to the traffic related queries.

The queries provided by the City of Holdfast Bay are quoted in italics below, followed by my response.

> *"The transformer located in the north-eastern corner may impede visibility for drivers exiting the basement ramp. If the structure compromises required sightline offsets to pedestrians approaching along the western footpath, this creates a high-risk conflict point. A formal sightline assessment must be provided to verify compliance with relevant safety standards."*

The proposed driveway will be categorised as a "low volume (Category 1) access driveway" and therefore has a minimum width requirement of 3.0 m. If this width was adopted, the pedestrian sight line requirement is easily met. Nevertheless, allowing for the two-way entry width of 5.5 m identified by the *"Australian/New Zealand Standard for Parking Facilities – Part One: Off-Street Car Parking"* (AS/NZ 2890.1), the transformer only has a minor intrusion into the pedestrian sight line triangle (by approximately 80 mm) as illustrated in Figure 1 below. This would have no material impact on safety at the access point (and noting that many other driveways within the surrounding area have greater restriction on the pedestrian sight line provisions with no notable crash history). Nevertheless, if desired, conformance with the Standard could be conditioned and this minor deficiency addressed easily in detailed design.

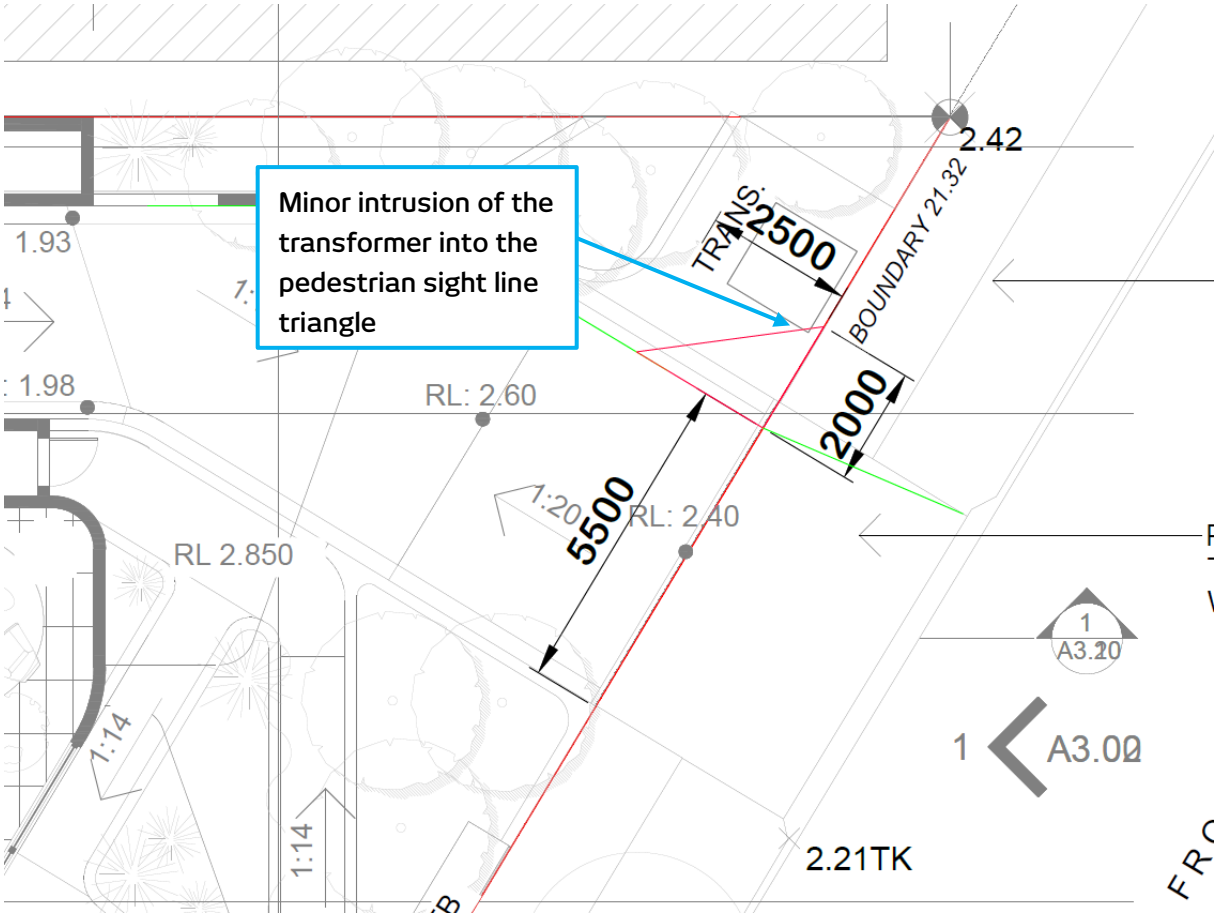

Figure 1 - Pedestrian sight line provisions at the access point

> *"Approximately 30% of the total parking supply (6 of 20 spaces) is configured as tandem parking. Without strong coordination between residents particularly those in Dwellings 13 and 14 this arrangement may cause:*
>
> - *Frequent shuffling of vehicles on the street, or*
> - *Vehicles temporarily blocking the internal aisle and ramp."*

Each tandem space (i.e. a space with another directly behind it) is proposed to be assigned to a single residential apartment. As such, coordination between residents of different dwellings will not be required for the use of these spaces. The suggestion of 'frequent' shuffling is not supported by the very low traffic generation associated with the proposal (6 peak hour trips). It is highly unlikely that another vehicle will be accessing the parking area while vehicles are being shifted. Additionally, residents (of the same apartment with tandem spaces) typically coordinate movements to minimise the need for shuffling. Nevertheless, vehicles can be shifted on-site (importantly not on the street) and stored within the aisle, whilst also not impeding access to the parking spaces for other users.

"...if wheel stops are proposed, this will alter the required parking bay dimensions. Please provide clarification on how this has been addressed in the design."

The provision of wheel stops does not require any alteration of the parking dimensions as per AS 2890.1:2004. Wheel stops are not currently proposed for the development (nor does the relevant Australian Standard require them).

"The vertical clearance on the ramp does not meet the minimum standards of 2.2 m for standard vehicles and 2.3 m for DDA-compliant (disability-accessible) vehicles. Updated ramp designs or compliance justification is required."

There is no requirement for DDA access within the residential building nor any disability parking provision within the site. Therefore, the vertical clearance requirement is a minimum of 2.2 m for standard vehicles. Figure 1 illustrates a cross section of the access ramp with a B99 large design vehicle template (based on 2.2 m vertical clearance).

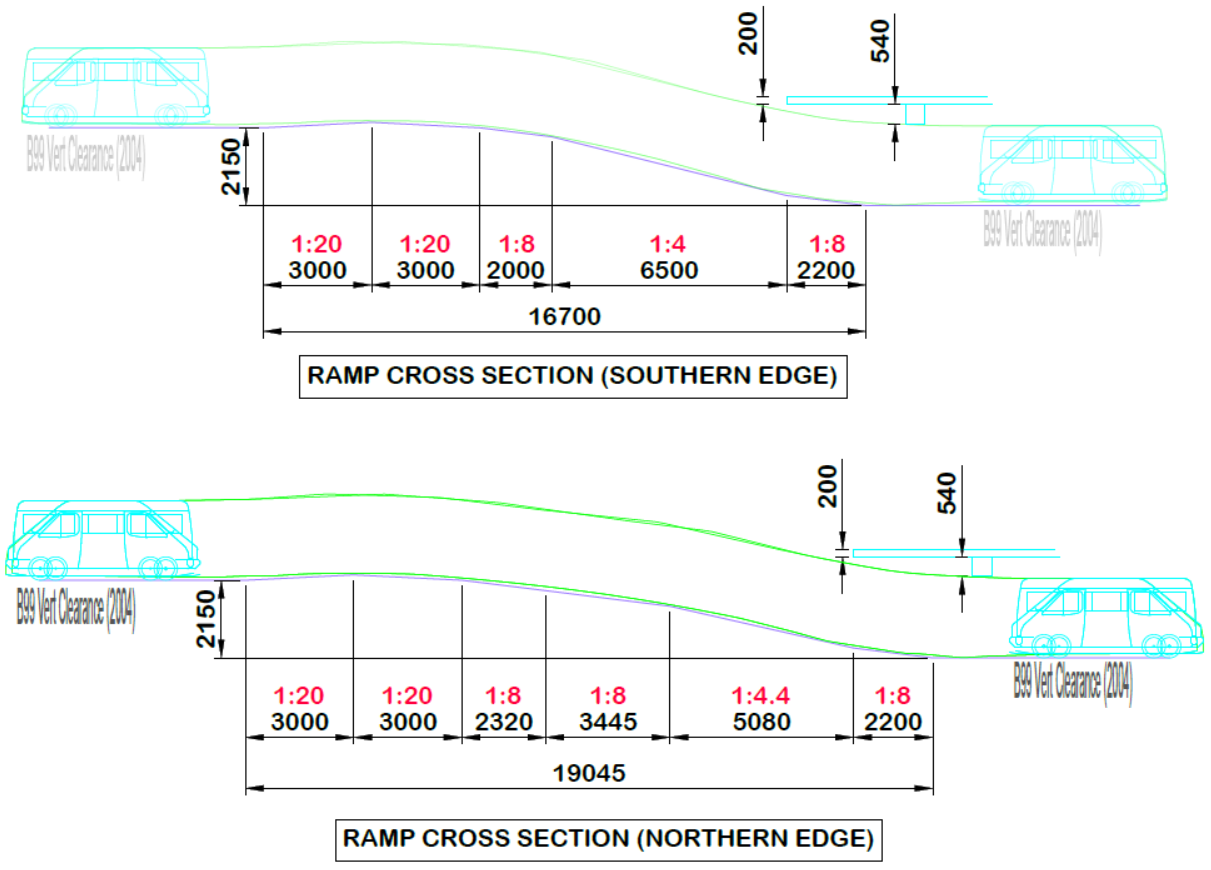

Figure 2 - Ramp cross section

As illustrated in Figure 1, the minimum vertical clearance of 2.2 m is provided for the access ramp and throughout the site (in fact, 2.4 m clearance is available from base of vehicle to the structure in excess of the requirement suggested by Council).

"Clarification is required on how one-way operation of the ramp will be managed, including:

- *Priority direction,*
- *Signage,*
- *Control systems (signals, mirrors, or sensors), and*
- *How conflicts between entering and exiting vehicles will be safely resolved."*

The traffic movements for the proposed development will be significantly less than the level of 30 peak hour movements, above which the Standard recommends two-way passing provisions. The proposed arrangement is conformant with the Standard and importantly, two-way access has been provided at the access point to minimise impacts at the property boundary. Nevertheless, further control can be reviewed during detailed design (such as convex mirrors for visibility, detector sensors/warning lights, etc.).

"The current waste strategy requires Council contractors to wheel 660 L bulk bins from the bin room to the kerb via the southern pathway, which ranges from 1.19 m to 2.89 m in width. This presents several concerns:

Navigating multiple bulk bins through a narrow corridor—particularly one that passes adjacent residential interfaces is operationally difficult. This may also create noise and disturbance for the neighbouring property at 2 Patawalonga Frontage. The kerb area appears insufficient to safely and legally accommodate bulk-bin collection. Please clarify:

- *Whether parking controls (e.g., "No Stopping" zones during collection) are required,*
- *How bin placement will avoid obstructing vehicles, cyclists, and pedestrians, and*
- *Whether the kerb structure is designed to withstand repeated bin loading."*

The current corridor is adequate in width for wheeling 660 L bins with additional clearance. In respect to noise and disturbance, such matters are outside of our expertise. Nevertheless, it is anticipated that bin collection would not occur in accordance with the noise restriction requirements.

Consideration may be given to provide parking control to Council waste vehicle access, however, is not strictly required. The proposed intent for bin collection was for a contractor to wheel bins directly to the collection vehicle and not be stored or presented kerb side where it may obstruct cyclists and pedestrians. Given that a bulk bin weighs less than a typical vehicle (which may come into contact with kerbs), it is not expected that there will be any notable damage to the kerb. Ideally, bins will be wheeled to the collection vehicle via the crossovers rather than across an upright kerb.

Nevertheless, noting Council's comments, an alternative waste management approach has been recommended based on Council collection and adoption of 240 L bins. This would result in a requirement four (4) general waste bins and six (6) recycling bins (and the original three (3) organic bins proposed). There would be adequate area within the bin

store to accommodate this number of bins. The 240 L bins could then be presented kerbside as occurs for many neighbouring properties (some with similar densities/dwelling numbers to the proposal). Noting that there is adequate space for bin presentation along the subject site's frontage.

Figure 2 illustrates the associated bin presentation along Patawalonga Frontage and storage of bins within the waste room on-site (noting that the week with recycling collection results in a greater number of bins presented on-street than the green organics collection week).

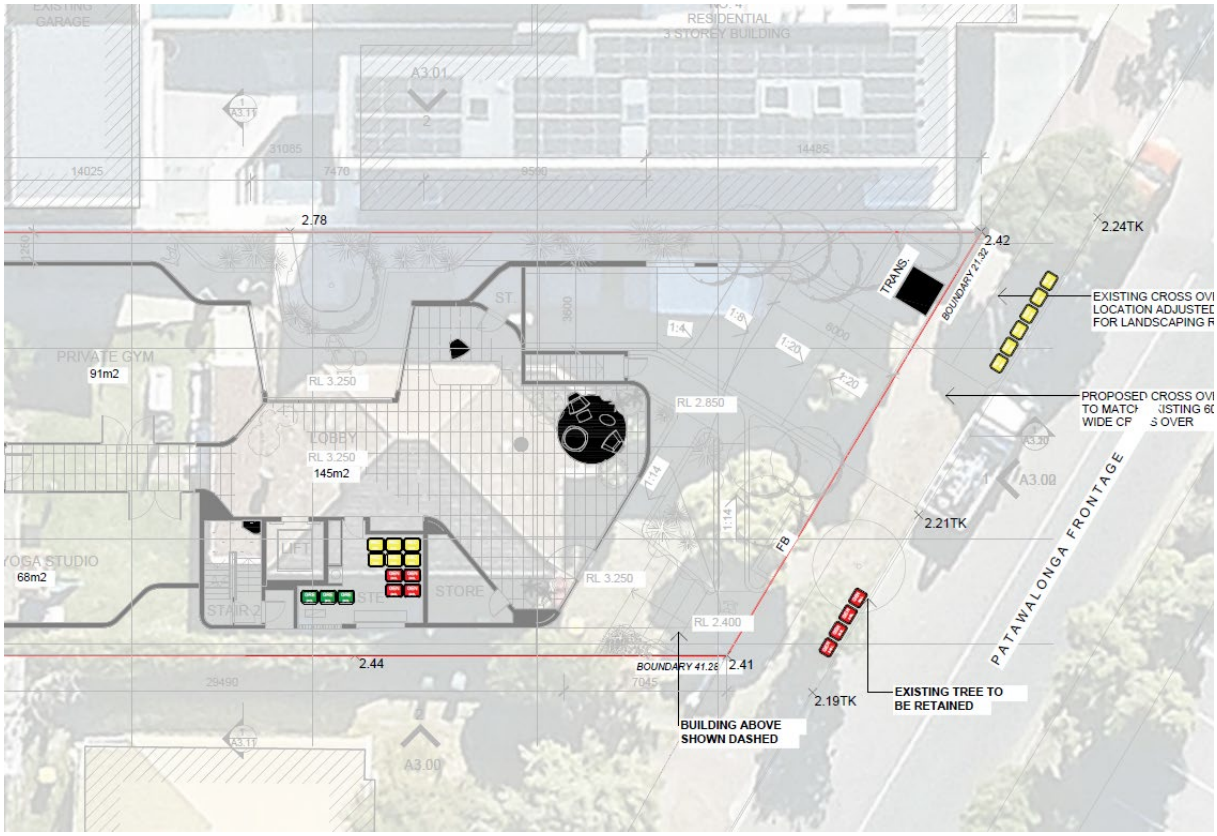

Figure 3 - Bin Storage and Bin Presentation along Patawalonga Frontage

I highlight that such arrangements are similar to other medium density dwellings within the immediate vicinity which rely on Council collection and on-street presentation. This includes presentation of bins on the eastern side of Patawalonga Frontage as highlighted in Figure 4 (this could be an alternative location for bin presentation for the subject site as well).

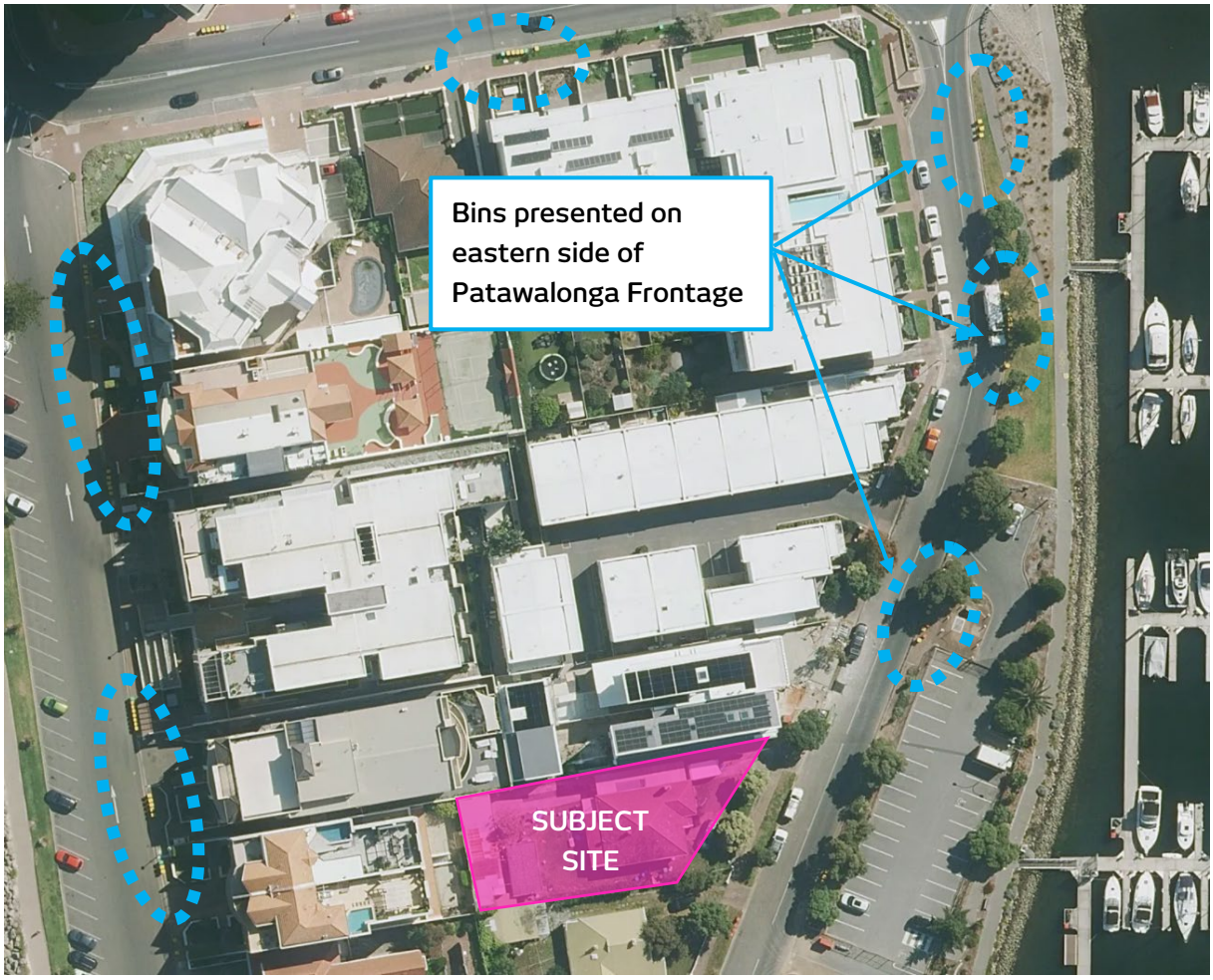

Figure 4 - On-street bin presentation for nearby medium density developments

I trust the above information sufficiently responds to Council's RFI queries (relevant to traffic and waste). However, please feel free to contact me on (08) 7078 1801 should you require any additional information.

Yours sincerely,

BEN WILSON
Managing Director | CIRQA Pty Ltd