

15th January 2026

The Secretary
State Commission Assessment Panel
GPO Box 1815
Adelaide SA 5001

via PlanSA portal

Attention: Phil Mabbs

Dear Phil

**SCAP REFERRAL – Regulation 23(2)(b)
COUNCIL COMMENTS – DA 25038676 – 1- 3 Spence Av and 380 Glen Osmond
Rd Myrtle Bank SA 5064**

I write in response to the above matter, which relates to a:

*Retirement Facility and Ancillary Community Hub, Alterations and Additions to State
Heritage Place and Tree Damaging Activity*

The referral provided Council with architectural plans, technical experts reports and a supporting planning statement. The attached report outlines the Council's comments on the application, in accordance with designated matters covered in the Planning, Development and Infrastructure (General) Regulations 2017.

While Council's role is limited to comments on designated matters, observations in relation to planning assessment matters with implications from a local perspective, are also highlighted on key issues that are considered to require further analysis and assessment by PLUS officers and SCAP.

If there are any queries or need for further clarification, please contact Amelia De Ruvo, Senior Planning Officer, by email at aderuvo@unley.sa.gov.au or 8273 8710.

Yours sincerely



Tim Bourner
Assessment Manager
City of Unley

SCAP Referral – Regulation 23(2)(b)

Council Comments: DA 25038676 – 1- 3 Spence Av and 380 Glen Osmond Rd Myrtle Bank SA 5064

for

Retirement Facility and Ancillary Community Hub, Alterations and Additions to State Heritage Place and Tree Damaging Activity

Council's Comments on Designated Matters

The following summary lists the items that Council considers are critical to addressing the designated Council matters under Regulation 23(3) prior to a decision being made on this proposal.

The full assessment of the development is the role of the Planning & Land Use Services (PLUS) officers and the ultimate planning approval judgement, the role of the State Commission Assessment Panel (SCAP).

It is appreciated Council's role is limited to comments on designated matters but observations in relation to planning assessment matters with implications from a local perspective are appropriate to highlight key issues that require further analysis and assessment by PLUS officers and SCAP.

The following comments raise fundamental concerns with the development, outlines amendments sought, and additional information requested.

Arboriculture

The following comments relate to Council owned street trees:

- Council is **not** supportive of the development removing public street trees to facilitate vehicular access on Spence Avenue, specifically Tree 1 and 2 as identified within the *Arboricultural Impact Assessment*, prepared by Treesense Consulting, dated 31 October 2025, *Appendix 1: Complete Tree Data* and *Appendix 3: Indicative Tree Location Plan*. Both street trees have long life expectancies and collectively improve the amenity of the streetscape and are a notable visual element.

Further investigations are required to be undertaken to determine alternative access arrangements to maintain the two street trees.

Traffic

The following comments relate to the on-site and off-site management of traffic, vehicular manoeuvrability and stormwater design and management on site:

Vehicular Access

- Spence Ave:
Access via Spence Ave is proposed via a new widened dual access crossover (no width measurements provided), with the crossover design shown to chamfer between Spence Ave and the site. The transport report has indicated that all waste collection and community bus access will be via Spence Ave. The turn path assessments

provided indicate that on-street parking will be impacted to cater for both waste collection vehicles and the community bus, which is not considered acceptable.

Amended plans are to be provided to address the following matters, to the satisfaction of Council:

- 1. To include crossover dimensions and ensure design is in accordance with council standards;**
- 2. Provide update turn path assessments to ensure that no on-street parking spaces are impacted to cater for waste collection or community bus access (noting this is a consistent issue raised with Council from the landowner currently given the width of the street and high parking congestion).**

If the above cannot be achieved, then the development must be updated so that all waste and community bus access to/from the site is via Glen Osmond Road.

- Glen Osmond Road:
Access via Glen Osmond Road is proposed via two separated crossovers, entry only and exit only crossover (no width measurements provided), with the outbound crossover design shown to chamfer between Glen Osmond Road and the site. The turn path assessments provided indicate that an 8.8m fire truck and 7.7m community bus are able to enter and exit the site with suitable clearance, which is considered acceptable.
The plans are to be updated to include crossover dimensions and ensure the crossover is constructed in accordance with council standards. Advisory Note 1, outlined in Appendix A, is recommended to be included as part of approval.
- Plans provided make it difficult to determine if adequate pedestrian sight line requirements have been provided adjacent all outbound crossovers.
The plans are to be amended to ensure pedestrian sight triangles are provided adjacent each exit lane in accordance with Australian Standards.

Headroom and gradient of ramps

- The Australian Standards (AS2890.1-2004 – Section 5.3) state to permit access for both cars and light vans, the height between the floor and an overhead obstruction shall be a minimum of 2.2m.
The plans are updated to ensure all height clearances and ramp gradients are provided in accordance with the relevant Australian Standards.

Parking provisions

- Given the proposed use, the site will have a combination of Resident Parking (User Class 1 or 1A – AS2890.4) and medium-term visitor parking (User Class 2 - AS2890.4). The Australian Standards for these parking spaces requires:
 - 90 Degree - User Class 1A – 2.4m width, 5.4m length and 5.8m aisle
 - 90 Degree - User Class 2 – 2.5m width, 5.4m length and 5.8m aisle

Additional information in the form of a parking management plan, identifying the parking spaces dedicated to residents and which are dedicated to visitors. Additionally, amended plans are to be provided to include appropriate signage and line marking to indicate separate resident and visitor car parking spaces.

On-Street Parking

- Resident / visitors of the development will not be eligible for parking permits and will need to abide by all on-street parking restrictions.
It is requested that Advisory Note 2, outlined in Appendix A, is recommended to be included as part of an approval.
- The existing on-street parking adjacent to the site on Spence Ave is unrestricted on both sides of the street, noting that during the day parking congestion is reaching capacity with limited availability to support any additional demand. The existing on-street parking adjacent to the site on Glen Osmond Road is Clearway, 7am-10am, Mon-Fri and Bike Lane all other times.

Council officers will not change or remove any existing on-street parking restrictions along Spence Ave, Glen Osmond Road, or any nearby streets to cater for either short-term visitor parking, long-term resident parking or loading and waste collection noting the transport report indicates that an appropriate quantity of on-site parking has been provided for the nature and locality of the subject site, noting the transport report indicates driveway crossovers have been designed in accordance with relevant standards and all access/egress movements are catered for.

It is requested that Advisory Note 3, outlined in Appendix A, is recommended to be included as part of an approval.

Bicycles

- The planning and design code does not provide guidance on the provision of bicycle parking for independent living accommodation; therefore, no provision is required. Notwithstanding, Council are seeking to support alternative modes of transport and the inclusion of both secured and accessible bicycle spaces is highly encouraged.
Although no requirement, it is recommended providing ground level bicycle parking racks for visitor to the site.

Loading and Waste Collection:

- The Planning and Design Code – PO 1.3 and PO 1.4 seek for industrial, commercial and service vehicle movements, loading areas and designated parking spaces are to be separated from passenger vehicle parking areas. This ensures efficient and safe movement, minimise potential conflict and that all loading, unloading and turning of all traffic avoids interrupting to the operation of and queuing on public roads and pedestrian paths.

Plans and transport report provided indicate that no separate dedicated waste and loading zone has been provided within the site, with waste and residential loading to occur within the access aisle. This represents a poor design outcome and increases likelihood of potential conflicts between resident / visitor vehicles and loading / waste collection vehicles.

Amended plans and traffic report is to be provided including a dedicated loading / waste collection zone that is separated from passenger vehicle parking areas. Any residential loading zone must be located to provide safe and convenient access to / from independent living units.

- The transport report provided has provided a turn path assessment which shows a 10.2m waste vehicle access and egress the site from Spence Ave, however the assessment does not include parked vehicles along Spence Ave, with the turn path showing that several on-street parking spaces would need to be removed to cater for the egress movement.
Additional turn path assessments are required to ensure that no on-street parking spaces are impacted to cater for waste collection (noting this is a

consistent issue raised with Council from the landowner currently given the width of the street and high parking congestion). If this cannot be achieved, then it is recommended that all waste vehicle access to/from the site is via Glen Osmond Road.

Civil

The following comments relate to the civil works required within the Council verge:

Ground Water

- Various areas within Council have low-lying water tables. Currently insufficient information has been provided to Council to determine whether the development will interfere with ground water. The applicant will be required to undertake further geotechnical investigations to assess potential groundwater levels and will then evaluate the options presented. Discharge of groundwater to the kerb and the water table will not be accepted.

Further investigations are required to be undertaken and to be reviewed by Council. It is requested that Condition 1 and Advisory Note 4, as outlined in Appendix A, is included as part of any approval.

Verge interaction

- Council seeks to ensure that all footpath paving on Glen Osmond Road and Spence Avenue are consistent with Council requirements.

Applications to alter the public realm will require to be lodged with Council. It is requested that Advisory Note 5, as outlined in Appendix A, is included as part of any approval.

- That any damage to the road reserve, including road, footpaths, public infrastructure, kerb and guttering, street trees and the like shall be repaired by Council at full cost to the applicant.

It is requested that Advisory Note 6, as outlined in Appendix A, is included as part of any approval.

- All vehicular crossovers / entries should be installed or reinstated to Council's requirements.

It is requested that Advisory Note 7, 8 and 9 as outlined in Appendix A, is included as part of any approval.

Stormwater Management

The following comments relate to the on-site and off-site management of stormwater management proposed by the development:

- To ensure that stormwater is managed appropriately on site and does not adversely impact on adjoining sites or the adjacent street network, it is requested that a condition of approval are included with any approval.

It is requested that Condition 2 and 3 as outlined in Appendix A is included as part of any approval.

- Council seeks to ensure that debris, soil, soil sediments and litter are maintained within the construction site and does not enter Council's drainage system, road network or neighbouring properties.

Additional information is to be provided to Council as to how debris, soil, soil sediments and litter will be managed on site and within car parking areas, to ensure it does not enter Council's drainage system. It is requested that Condition 4 as outlined in Appendix A is included as part of any approval.

Referral Conclusion

In principle the nature of the development, being a retirement facility, broadly accords with the Urban Renewal Neighbourhood Zone's Desired Outcomes and Performance Outcomes.

Notwithstanding, Council is seeking amendments to the proposal, additional information as well as Conditions and Advisory Notes to be included as part of any approval to ensure compliance with Council requirements. Matters of relevance are as follows:

- Council **will not** support the removal of the two street trees on Spencer Avenue and alternative access arrangements must be considered;
- Updated plans and reports showing the requested additional information, turn path assessments and documents regarding traffic and waste movements and activities;
- Inclusion of bicycle parking;
- Additional information and further investigations required to address concerns of Council regarding vehicular access and ground water;
- Applications are required for the proposed works in the public realm affecting street trees, crossovers and reinstatements, and upgrades to the verge area.

It is trusted that the information provided in this report is considered as part of the assessment. Council welcomes the opportunity for the application to be referred again if, or once, the above matters have been addressed to the satisfaction of Council.

If there are any queries or need for further clarification regarding the above matters, please contact Amelia De Ruvo, Senior Planning Officer, by email at aderuvo@unley.sa.gov.au or 8273 8710.

Planning Observations

The following comments refer to matters outside of the scope of Regulation 23(3) of the Planning, Development and Infrastructure (General) Regulations 2017 and are provided as general observations to assist with the assessment of the proposal.

In brief, the following planning observations are made in relation to the proposed mixed-use development:

- The loss of any regulated or significant tree is regrettable. The trees listed for removal are mix of indigenous, native and exotic trees in varying conditions. As noted above Council is not supportive of the removal of the regulated and non-regulated street trees required to facilitate the Spence Avenue access point. Whilst a comprehensive landscaping plan has been proposed it contains limited native and/or indigenous plantings.

Design alterations should be considered to retain as many significant and regulated trees as possible, especially those indigenous and native trees in good condition and any trees that are not directly impacted by the proposed buildings.

- The retirement facility has been designed in a manner that has considered the amenity of residents with all rooms being provided with direct access to balconies and / or natural light.
- The design and appearance of the proposed buildings have been well articulated to provide visual interest when viewed from the public realm.
- The design of the new buildings is considerate of the heritage values of the State Heritage listed building on the site and will ensure the heritage value is maintained and enhanced.
- The adaptive reuse, additions and restoration of the State Heritage listed building on the site is supported and will ensure the building remains a valuable part of the City of Unley's heritage for many years to come.
- There is limited activation between the proposed retirement facility and Glen Osmond Road frontage, specifically at pedestrian level, however given the nature of Glen Osmond Road this is not unexpected.
- Acoustic treatments should be installed to the eastern façade to reduce the emissions of noise from Glen Osmond Road.
- It is noted that some of the potential overlooking has been mitigated to some degree however some overlooking will still be possible from levels 1 to 4 of building 2. Further consideration by way of increased balustrade heights and obscure balustrade treatments should be considered to mitigate this potential and likely perceived overlooking further.
- The inclusion of solar panels is encouraged as it will assist in achieving the environmental performance outcomes sought by the Code. The roof plan shows sufficient area for solar panels and their inclusion should be considered.
- In principle Council are supportive of the re-development of the site, as it has remained underutilised for a number of years.

Landscaping

Council's Urban Design Lead provided the following commentary regarding the development.

- I would propose less lawns and larger (and particularly native and indigenous) garden beds which will be less reliant on irrigation and watering as well as granitic gravel areas for permeable and useable surfaces requiring no watering.
- Has there been any consideration for green gather spaces to allow residents spaces for birthday parties, BBQ's and / or a community kitchen garden space?
- The trees to be retained and removed need to be indicated on the landscape plan.
- Refer to page 10 landscape report, the use of more permeable surfaces such as sawdust mulch or granitic gravel mulch in place of some concrete paths (when compacted it is as DDA compliant and accessible). Consider the use of clay bricks to further reduce the use of concrete too. Use rocks in garden beds not just as features but for wildlife habitat.
- The precedent images on page 6 show a character with less lawns and more gravel mulch and garden beds but this could be further reflected in the landscape plans.

Parking provision

- The Planning and Design Code *Table 1 – Off-Street Car Parking Requirements* indicates that parking generation rates for the site. Based on the parking rates identified in Table 1 the proposed 46 retirement units and associate multi-purpose spaces would generate a minimum requirement of 102 off-street parking spaces, comprising:
 - 83 resident spaces
 - 9 residential visitor spaces
 - 10 non-resident spaces.

Plans provided by the applicant indicate that 132 off-street parking spaces will be provided, which exceeds the planning and design code and considered acceptable.

Additional information in the form of a parking management plan, identifying the parking spaces dedicated to residents and which are dedicated to visitors.

If there are any queries or need for further clarification regarding the above matters, please contact Amelia De Ruvo, Senior Planning Officer, by email at aderuvo@unley.sa.gov.au or 8273 8710.



Amelia De Ruvo
Senior Planning Officer
City of Unley

Appendix A – Conditions & Advisory Notes

Conditions

1. No groundwater is to be discharged into Council’s stormwater system.
2. All stormwater from the buildings and site shall be disposed of so as not to adversely affect any properties adjoining the site or the stability of any building on the site. Stormwater shall not be disposed of over a crossing place.
3. Stormwater run-off shall be collected on-site and discharged without impacting the safety or integrity of the adjacent road network. Any alterations to the road drainage infrastructure required to facilitate this shall be at the applicant’s cost.
4. Temporary debris and sediment control measures shall be installed prior to the commencement of work on site, to ensure that debris, soil, soil sediments and litter are maintained within the construction site. At no time shall debris, soil, soil sediments and litter from the construction site enter Council’s drainage system, road network or neighbouring properties.

Advisory Notes

1. The alteration of the verge to Glen Osmond Road and Spence Avenue shall be carried out in accordance with any requirements and to the satisfaction of Council at full cost to the applicant. Refer to the City of Unley website for Forms & Applications – Specification Crossover Opening, Kerb & Gutter, Footpath Repair.
<https://www.unley.sa.gov.au/Page/Forms-Applications>
2. Residential Parking Permits will not be issued to residents of Community or Strata titled dwellings or other multi dwelling buildings for development approved on or after 1 November 2013.
3. Parking restriction currently in place along Glen Osmond Road, Cross Road, Spence Avenue and surrounding street network will not be altered as a result of the development.
4. Numerous parts of the Council area have low lying water tables. Where there is sub-surface development occurring, groundwater can be encountered. Issues related to the disposal of this groundwater, either temporarily or permanently, can cause damage to surrounding Council infrastructure and cause problems for adjoining landowners. Where groundwater is encountered during the construction of the development, it will be necessary for measures to be taken to ensure the appropriate containment and disposal of any groundwater.
5. Any works undertaken on Council owned land (including but not limited to works relating to reserves, crossing places, landscaping, footpaths, street trees and stormwater connections and underground electrical connections), shall require a separate authorisation from

Council. Further information and/or specific details can be obtained by contacting Council's Asset Management department on 8272 5111.

6. That any damage to the road reserve, including road, footpaths, public infrastructure, kerb and guttering, street trees and the like shall be repaired by Council at full cost to the applicant.
7. The construction of the crossing place(s)/alteration to existing crossing places shall be carried out in accordance with any requirements and to the satisfaction of Council at full cost to the applicant. All driveway crossing places are to be paved to match existing footpath and not constructed from concrete unless approved by council. Refer to the City of Unley website Forms & Applications – Driveway Crossover Specifications <https://www.unley.sa.gov.au/Page/Forms-Applications>
8. Driveways Crossovers are not to be constructed from concrete over the footpath area between the kerb to boundary. Driveways and boundary levels at fence line are required to matching existing footpath level at boundary and or between 2% and 2.5% above kerb Height. Crossover is not to exceed 2.5% or 1:40 cross fall gradient over footpath between boundary to verge and not excess 5% from verge to crossover kerb invert.
If a driveway crossover or portion of a driveway crossover is no longer required due to the relocation of a new crossover or alteration to an existing crossover. The redundant driveway crossover or part of, is required to be closed and returned to kerb and gutter, also raising the footpath level to match the existing paved footpath levels at either side of the crossover being closed.
Provisions for Sliding Gate: Note that the high side of concrete plinths / footing for siding gates should not be higher than existing footpath level. Any level adjustments to gradients to achieve a level plinth for sliding gate railing is required to be within the property boundary.
9. All redundant crossovers shall be permanently closed and reinstated with kerb and gutter prior to the commencement of use of the development. All costs are to be borne