

18 March 2026

Mr Phil Mabbs
Senior Planning Officer
State Planning Commission
Via: PlanSA Portal

Our Ref: 53396LET02

Dear Mr Mabbs

Re: Application ID 25038676 – Response to Representations

MasterPlan provide this response on behalf of our client Southern Cross Care Inc. (our 'Client') in relation to Development Application 25038676, for a Retirement Facility and Ancillary Community Hub, Alterations and Additions to State Heritage Place and Tree Damaging Activity, located at 1 & 3 Spence Avenue, Myrtle Bank and 380 Glen Osmond Road, Myrtle Bank (the 'subject land').

We would like to thank the representors for taking the time to review the proposed development and providing valued feedback. We understand that as a result of the notification period, four (4) representations were submitted in response to the proposed development, one (1) of which wishes to be heard by the State Commission Assessment Panel. The matters raised by the representors are summarised as follows:

- Concerns the proposal will exacerbate the already-congested Spence Avenue through increased on-street parking and further congest on the Spence Avenue and Cross Road intersection.
- Confirmation that access to the site for 'heavy delivery vehicles' will be via Glen Osmond Road only and prohibit tradesmen from parking on Spence Avenue.
- Proposed location of bus shelter will cause sun glare from bus windows into adjacent dwellings, causing safety issues for pedestrians and motorists.
- Glare from headlights of vehicles exiting the proposed two-way road will shine directly into the living room, when vehicles are turning left into Spence Avenue.
- The proposed increase to traffic volumes on Spence Avenue will have an impact on both safety and function of Spence Avenue.



- Due to the proposed location of the Independent Living Units and Community Centre, access should be solely from Glen Osmond Road.
- The provision of a pedestrian access pathway should be included in the proposed development to decrease the need for pedestrians to use Spence Avenue and increase pedestrian safety.
- Southern Cross Care staff park in Spence Avenue all day, the proposal should include staff parking.
- The proposed development will negatively impact the ability of the private residents to safely evacuate in case of an emergency.
- The Waste Management Plan provides conflicting information in relation to site access associated with waste management vehicles.
- Vehicle movements and noise during construction will create excessive disturbances and congestion in Spence Avenue, as such all construction vehicles should access the site via Glen Osmond Road and not Spence Avenue.
- The new buildings will affect the general environment, view and house values.

We have reviewed the proposed development and the comments received by representor's and provide our response below.

As is evident above, the predominant concerns raised by the representors are directly related to the perceived increase in vehicle and pedestrian utilisation on Spence Avenue, resulting in an unacceptable increase in congestion and safety-related concerns. Ancillary to this is the perception the proposed development will contribute to increased reliance upon on-street parking, by future residents, visitors and staff alike.

We consider that the proposed development and associated on-site road network that service it, have been carefully designed to allow for a significant over provision of on-site parking, for both residents and visitors. The proposed development will include a total of 94 resident parking spaces, 18 visitor spaces, two (2) drop off spaces, four (4) community bus parking spaces and contribute an additional 18 parking spaces within the road widening area.

As outlined on page 57 of the planning report, the Code envisages the need for 102 total parking spaces, to which the proposal considers an over-provision, especially when coupled with the design alterations to the Spence Street access resulting in a further three (3) parking spaces, inclusive of one (1) extra DDA space.

Our client hopes that the proposed development goes some way towards alleviating the existing congestion and perceived shortfall in on-street parking.

Further and having regard to the existing versus proposed usage rates of the Cross Road and Spence Avenue intersection, the ETA report considers the following:



“The SIDRA analysis has indicated that the intersection will continue to operate satisfactorily with the proposed development with minimal to no notable change to the intersection performance. Similarly, queue lengths and delays will have minor changes between existing and post development scenarios.”

In relation to the concerns regarding sun glare from parked bus windows and glare from headlights, our Client has instructed Empirical Traffic Advisory to alter the location and design of the vehicle access to Spence Avenue. As a direct result, the location of visitor and bus parking has been reconfigured to address these concerns. A copy of the amended entry design has been prepared by ETA and is **enclosed**. The amended design now forms the proposed access and internal bus parking.

With regard to inconsistencies contained within the Waste Management Plan, we confirm that the type of trucks to be utilised for waste management are capable of entering and exiting the subject site from both Spence Avenue and Glen Osmond Road. As stated in the Waste Management Plan, bin collections would occur once a week, for a maximum of 10 minutes per service.

Closure

In summary, the proposed development is contextually appropriate and will not adversely impact upon the current amenity enjoyed by existing residents within the locality.

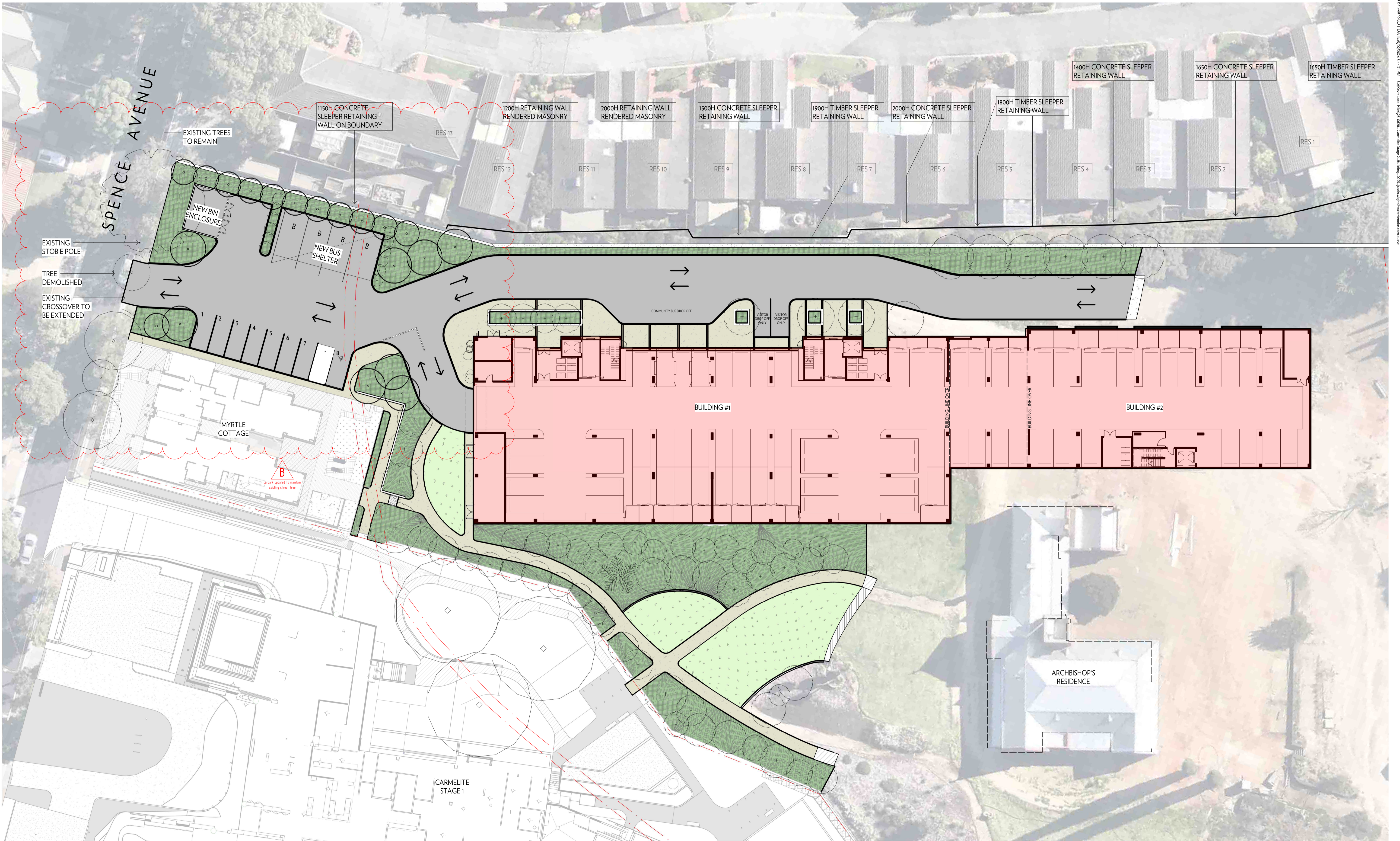
The proposed resident and visitor carpark will provide relief from on-street parking shortfalls and have been designed to minimise adverse impacts on adjoining property owners and residents of the existing Carmelite facility.

We trust that the above response provides clarification and sufficiently address the concerns raised by the representors and enable Commission to continue their assessment.

Should Commission have any further queries or wish to discuss in more detail please do not hesitate to contact the undersigned on 08 8193 5600.

Yours sincerely

Ken Body
MasterPlan SA Pty Ltd



SITE PLAN - LOWER

REASON FOR ISSUE	REV	DATE
For Approval	A	29-10-2025
General updates as noted	B	05-02-2026

