

July 22, 2026

Joanne Reid
Senior Planning Officer
Planning & Land Use Services
Department for Housing and Urban Development

Via: The PlanSA Portal

Dear Joanne,

DA 26009707: 29 - 31 AUSTRAL TCE MORPHETTVILLE SA 5043 (BUPA)

We provide this response to address items raised as part of the below articles:

- City of Marion response pursuant to Regulation 23(2)(b) for the purposes of section 94(1)(a)(ii) of the Planning, Development and Infrastructure Act 2016 (the 'Act');
- Representations received as part of public notification undertaken as prescribed in Section 107(3) of the Act; and
- Comments received via from the Department for Housing and Urban Design ('DHUD').

From a review of the articles, the critical planning matters have been highlighted below:

- City of Marion
 - Generally supported the proposed land use acknowledging 'supported accommodation in the form an Aged Care Facility is appropriate within the ... Zone' and 'does not object, in principle to the proposal';
 - Identified potential conflicts with Council infrastructure and potential requirement for a separate infrastructure agreement or approval under Section 221 of the *Local Government Act*;
 - Identified internal traffic control measures to be installed to the satisfaction of the Commission and included to comply with AS 2890.1-Off-Street Carparks, which references aisle lengths over 100 metres should have traffic control devices;
 - Requested rainwater tanks should be connect to proposed toilets at a rate of approximately 1,000 litres/toilet;
 - Sough clarification regarding the collection route of waste collection vehicles in and out of the site;
- DHUD
 - Sought a reduction in the pylon sign to a more appropriate scale;
 - Reaffirmed Council's comments relating to internal traffic calming matters and access to Appleby Road;
 - Sought clarification relation to the pedestrian access and connectivity for vulnerable users between the Welcome Hub and Linear Park;
- Representors

- Four (4) representors received with two (2) in support with concerns, one (1) in support, and one (1) opposing the development;
- Opposition to development was guided towards:
 - direct overlooking;
 - traffic impacts to the surrounding locality;
 - visual impacts and inconsistent bulk and scale;
 - construction phase disruptions and impact to the locality; and
 - negative impact on property values.

Based on the above critical items the proponent has further amended plans to address concerns raised by the Council, DHUD and representors, contained within the appendices of this response:

- Architectural Drawings prepared by Walter Brooke, dated 14 July 2026 within Appendix 1;
- Traffic, Parking and Waste documentation by CIRQA within Appendix 2 comprising:
 - » Schedule 6 Referral Response, dated 13 July 2026;
 - » Traffic and Parking Report, dated 13 July 2026;
 - » Waste Management Plan, dated 13 July 2026;
- Water Specialist Advice prepared by HydroChem, dated 26 June 2026 within Appendix 3;
- Landscape Plan prepared by Oxigen, dated July 2026 Issue E, within Appendix 4; and
- Stormwater Management Plan prepared by CPR Engineers, dated 14 July 2026 within Appendix 5.

Where design changes could not directly address critical items, further commentary has been provided with consideration to the provisions of the Planning and Design Code (the 'Code').

For clarity this response has been provided to address the critical items which correlates with, infrastructure, traffic, design and overlooking, advertisements, and stormwater management.

Updated Documentation

In response to the articles noted within, along with further development of the project, the following key amendments to the design are confirmed:

- Stairs – The stairs now are considered external stairs via similar openings in the walls to the windows;
- ILU Level
 - » Library removed to incorporate an additional ILU;
 - » Development of plan layouts has resulted in windows and balconies refinement throughout;
- RAC a reduction in the number of beds from 143 to 141;
- RAC Level - Development of 1.5 bedrooms have resulted in window adjustment to the Front Façade;
- Building Height Reduction of 1300mm, was 19500mm now 18200mm;
- Speed hump added to driveway;
- Publicly accessible area shown Purple on Ground Floor Plan; and
- Shading boxes added to North ILU's windows, removal of obscure balcony detail.

Infrastructure - Council

It is acknowledged Council has identified a potential conflict from the proposed alterations to the existing crossover to Austral Terrace inclusive of a Side Entry Pit (SEP). As sought by Council, the applicant agrees that a condition of planning consent requiring approval under Section 221 of the Local Government Act 1999 is appropriate.

Traffic - Council

In response to comments from Council relating to the driveway length exceeding 100 metres and therefore requiring adequate traffic control measures, the applicant engaged CIRQA to review the referral response and provide an updated design. The following is extracted for clarity:

It is noted that the Australian/New Zealand Standards for Parking facilities, Part 1: Off-street car parking (AS/NZS 2890.1:2004) specifies that traffic control devices shall be used on parking aisles exceeding 100 m in length (i.e. a parking aisle with more than 40 90-degree parking spaces on either side). Noting that the driveway highlighted by the City of Marion is a circulation roadway, this requirement is not strictly applicable to the proposal. Nevertheless, the car park design has been updated to incorporate road humps spaced 40-50 m apart within the straight segment of the circulation roadway, as reflected in the updated traffic and parking report (V1.3, dated 13 July 2026).

Council is also seeking improved separation between the ingress and egress to/from Appleby possibly via an extension of the central island.

This recommendation has been incorporated into the updated design and is reflected in the revised traffic and parking report, noting a Section 221 permit will be required for construction of the section located within public road reserve.

Council has also recommended that the applicant consider and identify the proposed collection route of waste collection vehicles in and out of the site and to demonstrate forward movement of collection vehicles, minimising reversing movements for safety.

Further clarification was also sought on the appropriateness of internal driveways being appropriately engineered and designed to accommodate repeated heavy collection vehicle use and for swept path and turning pressure point analysis.

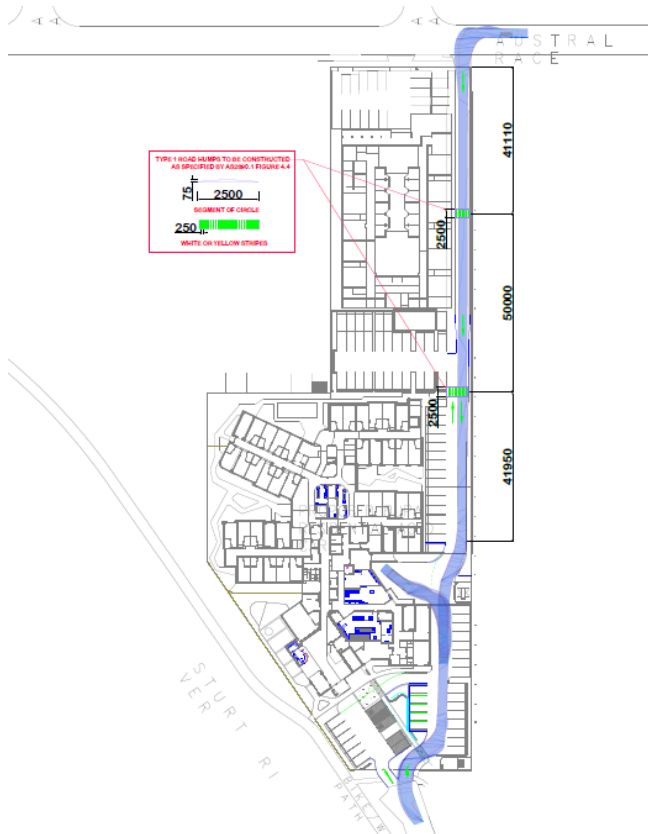
The amended access points and internal driveway have been reviewed further by CIRQA and demonstrate the ability for a waste vehicle (10.2 metre rigid vehicle) to enter and exit the site in a forward direction.

Section 3.3 *Servicing and Deliveries* of the traffic and parking report specifies that the site will accommodate a 10.2 metre refuse collection vehicle (and other servicing trucks up to 11 metres) with all manoeuvres accommodated on site (forward-in/forward-out). Turn path plans for the waste collection vehicle during all stages of development are provided in Appendix B and highlighted in Figures 1 and 2 in the overleaf.

Figure 1 Waste Vehicle Swept Paths – Stage 1



Figure 2 Waste Vehicle Swept Paths – Stage 2



Traffic - Representors

Traffic comments raised by representors relating to congestion and inadequate parking areas have previously been addressed as part of the CIRQA submission.

To assist the representors, it is reiterated that the proposal exceeds the DTS/DPF criteria for vehicle parking specified by the Code as outlined in Section 4.1.

It is also highlighted that the amended plans will include an increase of one (1) ILU and a reduction in the number of beds (supported accommodation) from 143 to 139, resulting in a further surplus of 4 parking spaces, exceeding the DTS/DPF criteria and theoretical demand for 71 spaces as per *Table 1 – General Off-Street Car Parking Requirements* upon the completion of the masterplan.

In determining whether the achievement of Table 1 and the DTS/DPF for car parking is sufficient, the recent ERD Court matter of *Palma Investments Pty Ltd v Assessment Panel – City of Mitcham [2026]* SAERDC 5 (5 March 2026) is highly instructive with the following:

Does meeting the DPF result in the proposal satisfying the PO?

41. The Court has previously considered the relationship between PO's and their associated DPF's in matters where the DPF has not been satisfied and consideration has then been given to whether the PO is still achieved.[14] In this instance the DPF is satisfied. The CAP submits that it does not follow that the PO is therefore met.

44. The Appellant, whilst not contending that the satisfaction of the DPF automatically achieves the PO, noted that in this instance PO 5.1 and DPF 5.1 both refer to a parking rate, thus the achievement of the rate in the DPF equates to an achievement of the rate in the PO.

49. The overall development upon the Land satisfies the minimum rate of Table 2 and in doing so satisfies PO 5.1 which seeks sufficient parking to 'meet the needs of the development or land use having regard to factors that may support a reduced on-site rate' (my underlining). The PO continues by listing factors that may reduce the on-site rate.....

In this instance a reduced on-site rate over Table 1 and the DTS/DPF guide is not sought, and the provision of car parking consistent with the Code.

As outlined in Section 5.1 of the traffic and parking report, when comparing the traffic generation of the proposal with the theoretical movements associated with the current approval for the site, the proposal is forecast to generate an additional 9 trips during the site peak hour (which typically occurs around 10am for retirement facilities) and 6 additional trips during the (network) pm peak hour. These movements will have a negligible impact on traffic conditions in Austral Terrace.

Design and Overlooking

Items relating to design and overlooking were limited to the representations associated with 25 and 27 Austral Terrace and 1/33a Austral Terrace. For clarity Figure 3 demonstrates the location of the subject properties in relation to the development site.

It is unclear as to whether Representor 3 resides in Unit 7/25 Austral Terrace.

Design

Design concerns raised by representors are directed at DTS/DPF 2.2 within the Significant Retirement Facility and Supported Accommodation Sites Overlay, with a focus on the northern boundary interface.

In response to these comments, we firstly point out that Designated Performance Features ('DPF') are clearly identified in the Rules of Interpretation of the Planning and Design Code as only one way, or a guide, as to generally satisfy a Performance Outcome ('PO') as underlined in the below extract.

"A DPF provides a guide to a relevant authority as to what is generally considered to satisfy the corresponding performance outcome but does not need to necessarily be satisfied to meet the performance outcome, and does not derogate from the discretion to determine that the outcome is met in another way, or from the need to assess development on its merits against all relevant policies".

Therefore, the criteria in DPF 2.2 are not to be strictly applied and treated as a mandatory obligation to satisfy the corresponding Performance Outcome.

In turning to the relevant Performance Outcome PO 2.2 is provided below for clarity:

PO 2.2 *Development on a significant retirement facility and/or supported accommodation site designed to minimise impacts on local streetscapes and adjacent residential uses with regard to overshadowing, massing and building proportions.*

The proposed building has a setback of approximately 92 metres from Austral Terrace being a local collector road and 23 metres to Appleby Road (terminus). We submit the proposed development when viewed from Austral Terrace will not have a dominating visual impact on local streetscapes due to the generous setbacks.

Further the considered design consists of a central building with separate 'fingers' providing a high level of articulation and reducing massing on the site.

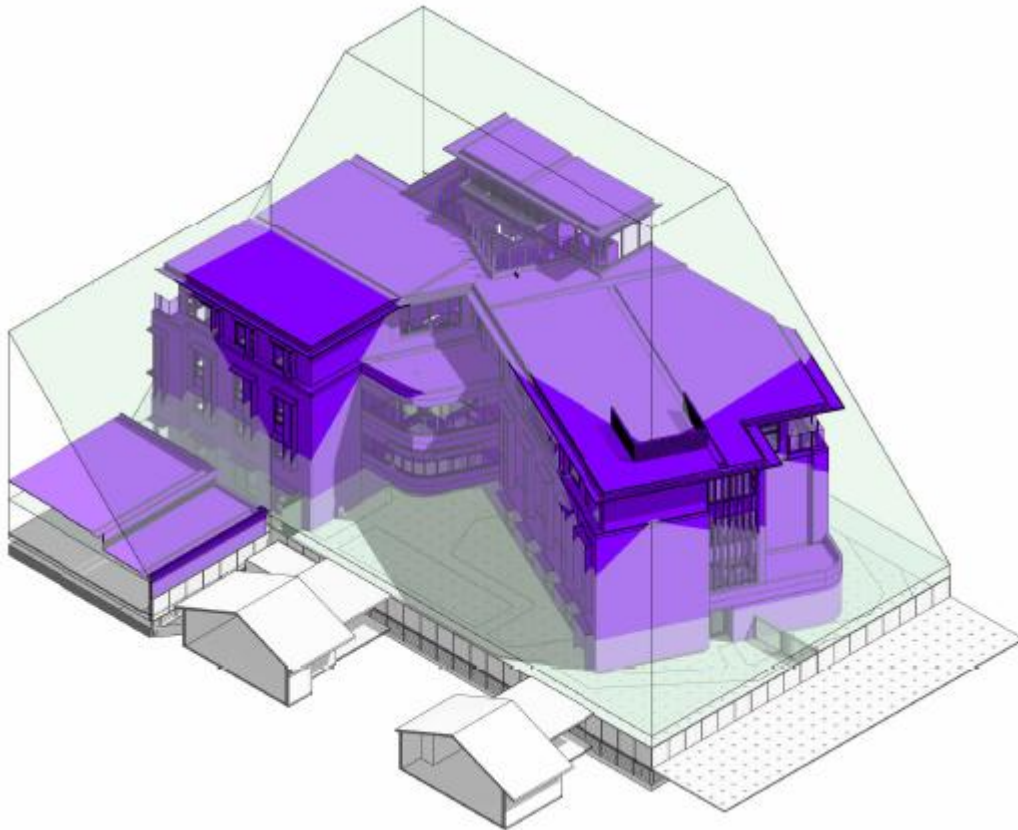
We acknowledge the representors have raised issues based on a location directly north of the proposed development site noting a portion of one of the 'fingers' exceeds the DPF guide.

In applying the 'numeric guide' of DPF 2.2, Figure 4 provides guidance on the extent of the area where the building achieves DPF 2.2, being the point where dark and light purple shading intersects.

Figure 4 likewise provides a visual depiction of where the building exceeds the numeric guide of DPF 2.2 with light purple shading.

It is also worth noting that the area depicted with light green shading highlights the large extent of area where no building work is proposed, however it would be within the DPF 2.2 guide.

Figure 4 DPF 2.2 Complying Envelope



Further visual analysis of the application of DPF 2.2 is provided on Sheet DA 15 of the architectural documents.

Having reviewed the above it is noted that:

- Significantly more building exceeds the guide offered by DPF 2.2 where adjacent the units to the NW;
- The 'fingers' offer significant articulation adjacent the units to the NW;
- The building purposefully provides setbacks that typically well exceed DPF 2.2 where adjacent the rear service areas (clothes lines), outbuildings and open space;
- Landscaped gardens adjoin the open space to the rear of the units at 25 Austral Terrace; and
- A single level carpark adjoins the open space to the rear of the units at 27 Austral Terrace.

Accordingly, DPF 2.2 is not intended to operate as a rigid 'tick-box' assessment tool. Instead, planning merit is appropriately assessed through a balanced and nuanced evaluation against PO 2.2, considering the proposal as a whole and the broader planning context.

Regarding overshadowing concerns raised, the development site is located south of received representors and does not result in any overshadowing impacts as per shadow diagrams prepared by Walker Brooke, refer Sheet DA 11.

Overlooking is guided by the Design in Urban Areas module within the General Section of the Code. It is important to note that POs 10.1 and 10.2 relate to *low rise* buildings, which as defined by the Code means up to and including 2 building levels.

Given the proposed development is not low rise, consideration of overlooking has been undertaken via the guidance offered by PO 16.1.

PO 16.1 *Development mitigates direct overlooking of habitable rooms and private open spaces of adjacent residential uses in neighbourhood-type zones through measures such as:*

- a) appropriate site layout and building orientation*
- b) off-setting the location of balconies and windows of habitable rooms or areas with those of other buildings so that views are oblique rather than direct to avoid direct line of sight*
- c) building setbacks from boundaries (including building boundary to boundary where appropriate) that interrupt views or that provide a spatial separation between balconies or windows of habitable rooms*
- d) screening devices that are integrated into the building design and have minimal negative effect on residents' or neighbours' amenity.*

PO 16.1 is implicit that the policy seeks to mitigate, not prevent or restrict all possible direct overlooking.

Furthermore, the mitigation 'test' for direct overlooking from a window, is limited to an area that falls within a horizontal distance of 15 metres measured from the centre line of the overlooking window and not less than 45 degree angle from the plane of that wall containing the overlooking window.

In relation to direct overlooking from a deck, balcony or terrace, is limited to an area that falls within a horizontal distance of 15 metres measured from any point of the overlooking deck, balcony or terrace.

We submit the proposed development:

- has been sited appropriately to manage interface issues with the inclusion of angled 'fingers' rather than a linear built form orientated parallel to the abutting boundaries;
- balconies and windows have been orientated as to not have direct orientation to external properties;
- the building has an approximate 12.5 metre setback from the abutting northern boundary and a total setback of approximately 18 metres to the main building on the abutting property when measured from the closest point on the northwest finger; and
- the inclusion of screening devices further reduces the impact of overlooking. Levels 1, 2 and 3 include windows shrouds and further where balconies are present glazed balustrades have been installed to a height of 1.8 metres on levels 1 and 2, and 1.5 metres on level 3.

Figures 5 and 6 below demonstrates the extent of direct overlooking to the abutting northern properties. Upon a review of the of the area there is an existing carport and outbuilding, as well as clothesline in this location (refer Figure 7).

Excluding the area containing the carport and outbuilding, the extent of overlooking into what may be considered or used as private open space ('POS') is limited.

Figure 5 Direct Overlooking – Level 1 and 2

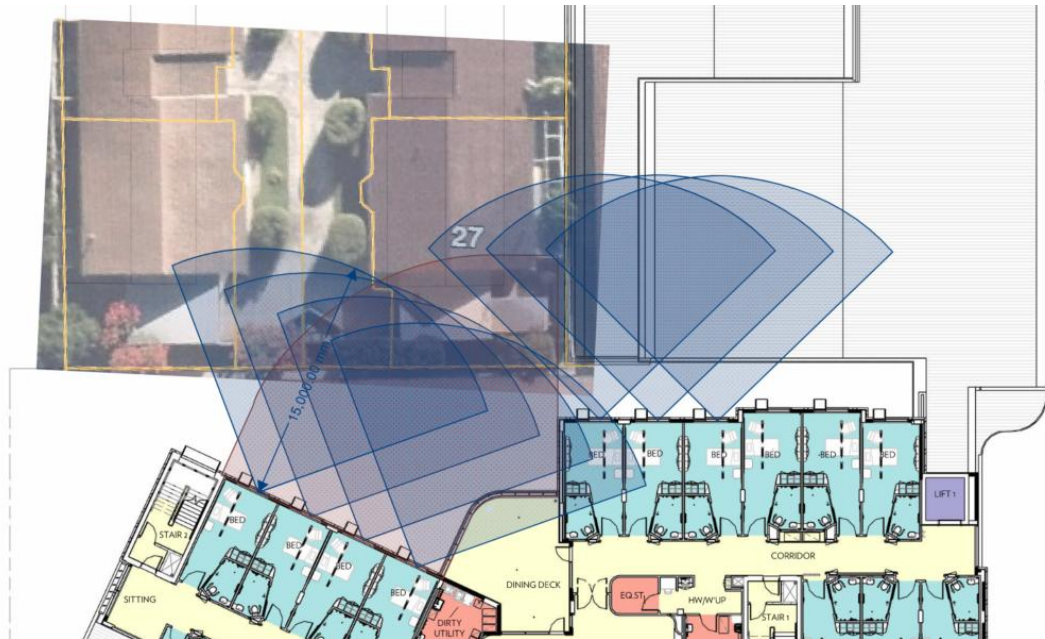


Figure 6 Direct Overlooking – Level 3

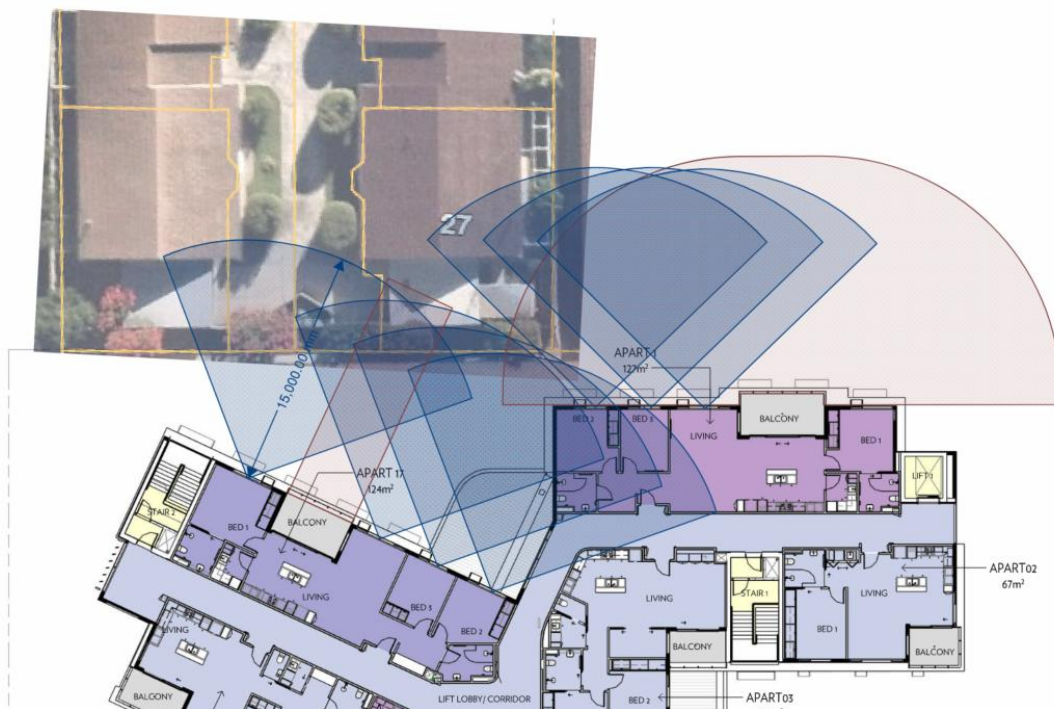


Figure 7 Existing Condition of 27 Austral Terrace



Based on the above we have formed the view that:

- Level 1 and 2:
 - » no direct overlooking from the windows associated with the NW finger will occur, with the outlook limited to the common driveway, carport and outbuilding structure.
 - » a small extent of overlooking is identified from the terrace 'dining' balcony (linking the NW finger and northern façade) and two (2) windows on the northern façade of the building for each level, however it is noted this area on the adjoining unit appears to be used as a service yard.
- Level 3:
 - » no direct overlooking from the NW finger windows will occur.
 - » no direct overlooking from the NW finger balconies will occur.
 - » views extend to the adjacent common driveway, carport and outbuilding structure.
 - » two (2) northern façade window present minor overlooking, however this appears to be associated with a service yard.

In summary, the Code clearly contemplates some direct overlooking. Where a small amount of direct overlooking occurs these views are oblique, as supported by PO 16.1(b).

In summary, the small extent of direct overlooking will have only a minimal negative effect on residents' or neighbours' amenity, as supported by PO 16.1(d).

Advertising

The pylon sign located at the Austral Terrace entry has been reduced in size from a total height of 3.9 metres to 2.7 metres, comprising a 2.1 metre pole with affixed 0.6-metre-high triangular sign.

Signage is intended to be illuminated to assist with wayfinding and identification purposes. Updated signage details are reflected in plans prepared by Walter Brooke (DA14).

Stormwater Management

The proposed development will result in approximately 172 toilets and require 172,000L of water tank storage to support the requested rate provided by Council. Advice from HydroChem was sought as part of this response to address the request for 1,000L rainwater tanks to be plumbed into each toilet.

Based on specialist advice, the introduction of large volumes of stored, low-turnover water, is cautioned against, as these systems can create ideal conditions for Legionella amplification. Due to the nature of the proposed use, housing highly susceptible persons, the provision of standing water has been strongly advised against within this development.

The advice provided by HydroChem has been submitted as part of this response and the plans have not been amended to include additional water tanks connected to toilets.

Character Clash

One representor has raised concern over the height of the building leading to a character clash. The Code provides clear planning policies in the form of the Significant Retirement Facility and Supported Accommodation Sites Overlay, which guides building of 4 levels and 15 metres in height on sites between 6,500 square metres up to 10,000 square metres in area or up to 6 levels and 22 metres in height on sites over 10,000 square metres in area.

The Significant Retirement Facility and Supported Accommodation Sites Overlay seeks the development of aged care and retirement facilities on large suburban sites.

While the low-rise form of the locality is noted, as are the policies seeking low-rise, low and medium-density housing in the General Neighbourhood Zone, Part 1 - Rules of Interpretation confirms that where there is an inconsistency between provisions in the relevant policies for a particular development, the provisions of an overlay will prevail over all other policies applying in the particular case.

Other Items

Comments provided via email from the DHUD sought clarification regarding the pedestrian access and connectivity for vulnerable users between the Welcome Hub and Linear Park. The amended drawings (in Appendix 1) delineate the Welcome Hub area in 'purple'. Back of house areas are highlighted in orange, common areas for residents in yellow and private rooms in blue. A family or staff member would accompany residents into open areas of the facility.

Access to the Linear Park is only available via pedestrian access from pedestrian connection to the southwest of the site, and is controlled with placement of a 1.8 metre palisade fence and gate, to ensure all residents can in necessary move around and secondly are able to exit the site in an emergency, refer Figure 8.

Figure 8 Ground Floor Layout and Pedestrian connections



As part of a review of the representation received we note concerns relating to noise and nuisance associated with construction, and negative impact to property prices. Although each of these items is not directly related to planning, we have provided a response to address the concerns of residents.

Regarding noise and nuisance, the proposed development and construction works will need to be undertaken under the relevant provisions of the Local Nuisance and Litter Control Act 2016. Due to the scale of development, it is anticipated State Commission Assessment Panel ('SCAP') will request a construction management plan, which includes a methodology to manage dust.

We trust the adherence to the relevant legislative requirements and provision of a construction management plan addresses this concern.

Housing prices and markets are not a direct consideration of planning, and we cannot comment further on the financial implications of the proposed development on the surrounding locality.

To assist in the long-term health of regulated trees on adjoining land, the applicant agrees that a condition be applied to ensure monitoring and certification in line with AS 4970 Section 5, as detailed on pages 40 and 41 of the Adelaide Arb Consultants report.

I trust that the amended plans and information provided within this response resolves the matters raised by DHUD, Council and representations received. Should you have any queries, please do not hesitate to contact me.

Yours sincerely,



Gregg Jenkins
Associate Director

APPENDIX 2: TRAFFIC, PARKING AND WASTE

Ref: 25414|RNM

22 July 2026

Gregg Jenkins
Future Urban
Level 1 74 Pirie Street
ADELAIDE SA 5000

Dear Gregg,

**BUPA MORPHETVILLE REDEVELOPMENT
29-31 AUSTRAL TERRACE, MORPHETTVILLE
REQUEST FOR INFORMATION (APPLICATION ID 26009707)**

I refer to the Schedule 6 Referral Response (Application ID 26009707) dated 27 May 2026 for the proposed aged care facility redevelopment at 29-31 Austral Terrace, Morphettville, as well as the representations received during the project's public notification period. As requested, I have undertaken a review of the traffic matters raised by the City of Marion and the representors. This letter outlines my response.

Response to Council Schedule 6 Referral Response

Key comments (relating to traffic, parking and waste) received in the Schedule 6 Referral response by the City of Marion have been summarised below in italics, followed by my response.

A traffic and parking report (V1 dated 02 March 2026) and a waste management plan (V1 dated 02 March 2026) were previously prepared by CIRQA in relation to the development application. The previous reports should be read in conjunction with the following responses.

The proposed extension of the existing driveway crossover to Austral Terrace is likely to impact an existing Side Entry Pit (SEP) which may require relocation towards the west. Any alterations to Council infrastructure should be negotiated with Council. The applicant should be aware that either a separate infrastructure agreement or approval under Section 221 of the Local Government Act 1999 will be required to cover these works, to be determined by Council.

The applicant is aware that a Section 221 permit will be required to undertake alterations to the crossover and SEP (if required). The final alignment of this crossover will be determined in conjunction with Council through this permit process.

The proposed internal driveway access allows for vehicles movement through the site between Austral Terrace and Appleby Road. Further, the section of driveway along the eastern boundary is approximately 138m in uninterrupted length. The Commission should be satisfied that adequate traffic control devices are included to comply with AS 2890.1 – Off-Street Carparks which references that references aisle lengths over 100m shall have traffic control e.g. road humps and to act as a deterrent for potential through traffic from Austral Terrace and or Appleby Road and promote a slow speed environment suitable for the proposed use. It is recommended that devices are spaced at 60-80 metres.

It is noted that the Australian/New Zealand Standards for *Parking facilities, Part 1: Off-street car parking* (AS/NZS 2890.1:2004) specifies that traffic control devices shall be used on parking aisles exceeding 100 m in length (i.e. a parking aisle with more than 40 90-degree parking spaces on either side). Noting that the driveway highlighted by the City of Marion is a circulation roadway, this requirement is not strictly applicable to the proposal. Nevertheless, the car park design has been updated to incorporate road humps spaced 40-50 m apart within the straight segment of the circulation roadway, as reflected in the updated traffic and parking report (V1.5, dated 22 July 2026).

"Improved separation between the ingress and egress to/from Appleby Road is encouraged, e.g. through extension of the central island as shown below..."

This recommendation has been incorporated into the updated design, as reflected in the revised traffic and parking report, noting a Section 221 permit will be required for construction of the section located within public road reserve.

The proposed private waste collection is supported. It is recommended that the applicant consider and identify the proposed collection route of waste collection vehicles in and out of the site, preferably to always demonstrate forward movement of collection vehicles and minimising reversing movements for safety. Further, internal driveways should be appropriately engineered and designed to accommodate repeated heavy collection vehicle use, including swept paths and turning pressure points.

Section 3.3 Servicing and Deliveries of the traffic and parking report specifies that the site will accommodate a 10.2m refuse collection vehicle (and other servicing trucks up to 11m) with all manoeuvres accommodated on site (forward-in/forward-out). Turn path plans for the waste collection vehicle during all stages of development were provided in Appendix B.

The Commission should be satisfied that documentation is clear and consistent. The Cirqa Traffic Assessment refers to 'Arundel Terrace' whereas this should refer to Austral Terrace.

The revised traffic and parking report has been corrected to ensure that all references are to Austral Terrace.

Response to Representations

Further to the above, I have undertaken a review of the traffic-related representations received as part of the community/public notification period in relation to the proposed project. Four (4) representations were received in relation to the proposed project of which one (1) provided comments in relation to traffic and/or parking matters associated with the proposal. Key comments (relating to traffic and parking issues) received in the representations have been summarised below in italics, followed by my response.

"The proposed development poses a severe threat to local traffic flow and parking availability: Insufficient Parking Offset: While the proposal notes an increase of 10 parking spaces compared to the current building, this is vastly inadequate for the projected surge in residents and staff. This shortfall will inevitably overflow onto the street."

The proposal meets (and exceeds) the DTS/DPF criteria for vehicle parking specified by the Planning and Design Code as outlined in Section 4.1 of the traffic and parking report. Note, the provision of parking through each stage of development will meet (and exceed) the DTS/DPF criteria, so at no point during the proposed development will there be a parking shortfall when assessed against the DTS/DPF rates.

"Existing Traffic Bottlenecks: Austral Terrace already struggles to cope with peak-hour traffic. Because Morphett Road is primarily accessed via Bray Street, Austral Terrace serves as the only alternative northern access point from Oaklands Road. Funneling(sic) significantly more vehicles into this specific, constrained grid will create severe traffic bottlenecks."

Traffic data collected as part of CIRQA's original assessment identifies peak hour traffic volumes of 225 vehicles per hour on Austral Terrace. Based upon the typical assumption that 10% of daily trips occur during the peak hours, Austral Terrace would have an Annual Average Daily Traffic (AADT) volume in the order of 2,250 vehicles per day, which is well within the theoretical capacity of a collector road such as Austral Terrace.

As outlined in Section 5.1 of the traffic and parking report, when comparing the traffic generation of the proposal with the theoretical movements associated with the current approval for the site (being 126 beds), the proposal is forecast to generate an additional nine (9) trips during the site peak hour (which typically

occurs around 10 am for retirement facilities) and five (5) additional trips during the (network) pm peak hour. The forecast movements will have a negligible impact on traffic conditions within the adjacent road network and, given the latent capacity outlined above, the movements will not impact the nature or function of Austral Terrace.

I trust the above addresses the matters raised by Council and the representors. Please feel free to contact me on (08) 7078 1801 should you require any additional information.

Yours sincerely,



REBEKAH MAXWELL

Transport Planner | CIRQA Pty Ltd

Encl.: - Traffic and Parking Report V1.5 dated 22 July 2026
- Waste Management Plan V1.5 dated 22 July 2026

APPENDIX 3: WATER SPECIALIST ADVICE

26 June 2026

James Heeks
Head of Property Development
Bupa HI Holdings Pty Ltd
255 Geroage St, Sydney, NSW, 2000

James.Heeks@bupa.com.au

Dear James,

Legionella Risk Management, Bupa – Morphettville Toilet Flushing Water Tank

In response to the query regarding the proposed 1,000-litre storage tank for toilet flushing at Morphettville, I would like to highlight that both enHealth and South Australian Legionella management frameworks caution against introducing large volumes of stored, low-turnover water, as these systems can create ideal conditions for Legionella amplification. Any tank that allows water to stagnate within the 20–45°C range is considered a preventable risk source under these guidelines.

For aged-care environments, where residents are highly susceptible, the introduction of a warm or intermittently used storage tank is inconsistent with the principle of eliminating avoidable microbial growth points. Even though the water is intended only for toilet flushing, any maintenance activity, cross-connection, or system fault can aerosolise contaminated droplets, creating an exposure pathway that would not otherwise exist. On this basis, the installation of such a tank would increase Legionella risk and is not supported by current public health guidance.

If you require advice regarding the implementation of any recommendations or any other aspect of *Legionella* control in your facility, HydroChem are very happy to help you.

Please do not hesitate to contact HydroChem on 1300 558 788 or call me directly on the number below.

Yours sincerely,



Huw Lloyd

Manager – High Risk Water Systems

huw.lloyd@hydrochem.com.au

0497 150 052