

PLANNING REPORT

BUPA AGED CARE FACILITY

29-31 Austral Terrace, Morphettville

Proponent:
BUPA Aged Care Pty Ltd

Date:
25.03.2026

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CONTENTS

1. EXECUTIVE SUMMARY	1
2. INTRODUCTION	3
3. THE SITE.....	4
4. THE LOCALITY	5
5. PROPOSED DEVELOPMENT	6
5.1 Land Use	6
5.2 Built Form	7
5.2.1 Accommodation Typologies	7
5.2.2 Building Composition	7
5.2.3 Building Height.....	7
5.2.4 External Materials	7
5.3 Demolition.....	8
5.4 Fences	8
5.5 Advertisements.....	8
5.6 Access and Parking.....	8
5.7 Stormwater.....	9
5.8 Waste.....	9
5.9 Landscaping	9
6. PROCEDURAL MATTERS	10
6.1 Planning and Design Code Version	10
6.2 Zone and Overlays	10
6.3 Relevant Authority.....	11
6.4 Referrals.....	11
6.4.1 Council	11
6.4.2 Sensitivity of Land Use.....	12
6.4.3 Overlays	12
6.5 Notification.....	13
7. ASSESSMENT AGAINST PLANNING AND DESIGN CODE	14
7.1 Land Use	14
7.2 Built Form and Character.....	15
7.2.1 Siting	15
7.2.2 Building Height and Form	17
7.2.3 External Appearance	17
7.3 Interface between Land Uses	18
7.3.1 Noise.....	18
7.3.2 Overlooking	19

7.3.3	Overshadowing	20
7.3.4	Lighting	20
7.4	Access, Traffic and Parking.....	21
7.4.1	Access.....	21
7.4.2	Traffic Generation	21
7.4.3	Car Parking	21
7.5	Regulated and Significant Trees	22
7.6	Stormwater Management	23
7.7	Waste Management	23
7.8	Landscaping	24
7.9	Advertisements.....	24
8.	CONCLUSION	25

APPENDICES

APPENDIX 1.	ARCHITECTURAL DRAWINGS
APPENDIX 2.	TRAFFIC PARKING REPORT
APPENDIX 3.	STORMWATER MANAGEMENT PLAN
APPENDIX 4.	LANDSCAPE CONCEPT REPORT
APPENDIX 5.	ENVIRONEMNTAL NOISE ASSESSMENT
APPENDIX 6.	ARBORICULTURAL IMPACT ASSESSEMENT
APPENDIX 7.	WASTE MANAGEMENT PLAN
APPENDIX 8.	CERTIFICATION OF TITLES

1. EXECUTIVE SUMMARY

Location	29-31 Austral Terrace, Morphettville
Current Land Use	Residential Aged Care Facility
Zone	General Neighbourhood Zone
Subzone	Nil
Overlays	Airport Building Heights (Regulated) - All structures over 15 metres Affordable Housing Building Near Airfields Hazards (Flooding - Evidence Required) Prescribed Wells Area Regulated and Significant Tree Stormwater Management Significant Retirement Facility Supported Accommodation Sites Urban Tree Canopy Water Resources
Technical Numeric Variations (TNVs)	Nil
Development	Construction of a five-storey residential aged care facility comprising 143 accommodation units, and 16 independent living units (with a mix of one-, two- and three-bedroom arrangements) with associated, car parking and landscaping
Elements	Supported Accommodation Residential Care Tree Damaging Activity Partial Demolition Signage
Assessment Pathway	Code Assessment – Performance Assessed
Notification	Notification is required <i>Building Height exceed 2 building levels and 9 metres as specified within DPF 4.1</i>
Referrals	City of Marion Adelaide Airport Authority

Planning and Design Code Version and Date	Version 2026.5 March 12, 2026
Relevant Authority	State Planning Commission

2. INTRODUCTION

This planning report relates to a proposed development by Bupa Aged Care Pty Ltd (**Applicant**) for planning consent for the construction of a five-storey residential aged care facility comprising 143 residential care rooms and 16 independent living units (with a mix of one-, two- and three-bedroom arrangements) and associated car parking and landscaping at 29-31 Austral Terrace, Morphettville (**Site**).

It is widely acknowledged that South Australia has an ageing population. The State's active retiree cohort is expected to increase by 30% by 2051, and the proportion of the population aged 80+ is expected to increase by 146% within that same period¹. This highlights the need for an increase in high-quality aged care facilities within the State, which the Applicant will address with the proposed development.

As included in Appendix 1, the design by Walter Brooke is guided by three core principles being **Brave, Caring, and Responsible**, which collectively shape an architecture that is both enduring and connected to its context.

Brave reflects a confidence in permanence, expressed through the use of robust materials such as brick, concrete, and metal that establish a grounded and authentic presence in the local landscape.

Caring is demonstrated through a design approach that balances this robustness with warmth and human scale, including a continuous masonry ribbon that references the organic curves of the Sturt River and Linear Park while creating a sensory environment rich in colour, texture, and seasonal change.

Responsible underpins the project's long-term vision, embedding environmentally conscious design principles and durable, low-maintenance materials to ensure longevity, foster a resilient urban ecosystem, and contribute to a vibrant, culturally rich community for generations to come.

In preparing this report, we have:

- inspected the Site and its immediate surroundings;
- identified and subsequently reviewed what we consider to be the most pertinent provisions of the Planning and Design Code (**Code**);
- had regard to the *Planning, Development and Infrastructure Act 2016* (**PDI Act**) and to the *Planning, Development and Infrastructure (General) Regulations 2017* (**PDI Regulations**);
- examined the Design Progress Presentation and Architectural Drawings prepared by Walter Brooke in **Appendix 1**;
- reviewed the supporting documents, including:
 - » Traffic and Parking Technical Memo prepared by CIRQA in **Appendix 2**;
 - » Stormwater Management Plan prepared by CPR Engineers in **Appendix 3**;
 - » Landscape Concept Report prepared by Oxigen in **Appendix 4**;
 - » Environmental Noise Assessment prepared by Sonus in **Appendix 5**;
 - » Arboricultural Impact Assessment (**Arborist Report**) prepared by Arborman Tree Solutions in **Appendix 6**;
 - » Waste Management Plan prepared by CIRQA in **Appendix 7**;
- had regard to the Certificates of Titles in **Appendix 8**.

¹ Per the details provided by the State Planning Commission in its Accommodation Diversity Code Amendment paper.

3. THE SITE

The Site comprises two land parcels of contiguous land legally described as:

- Allotment 509 on Filed Plan 9790 held within Certificate of Title Volume 5091 Folio 478 (**Lot 509**); and
- Allotment 510 on Filed Plan 9790 held within Certificate of Title Volume 5091 Folio 479 (**Lot 510**)

The Site is more commonly referred to as 29 – 31 Austral Terrace, Morphettville.

The Site:

- has a primary street frontage of 39.62 metres to Austral Terrace;
- has a secondary street frontage of 34.14 metres to Appleby Road;
- has an overall area of approximately 10,188 square metres;
- is improved by a number of buildings comprising supported living accommodation, associated shade structure, parking areas and landscaping;
- has a single egress and ingress access points at both Austral Terrace and Appleby Road;
- contains three significant trees and five regulated; and
- is not affected by any easements, encumbrances, land management agreements, or the like.

The Site is captured in **Figure 3.1**.

Figure 3.1 *The Site*



Plan Production: 16/03/2026

Subject Site

LEGEND

— Subject Site Boundary



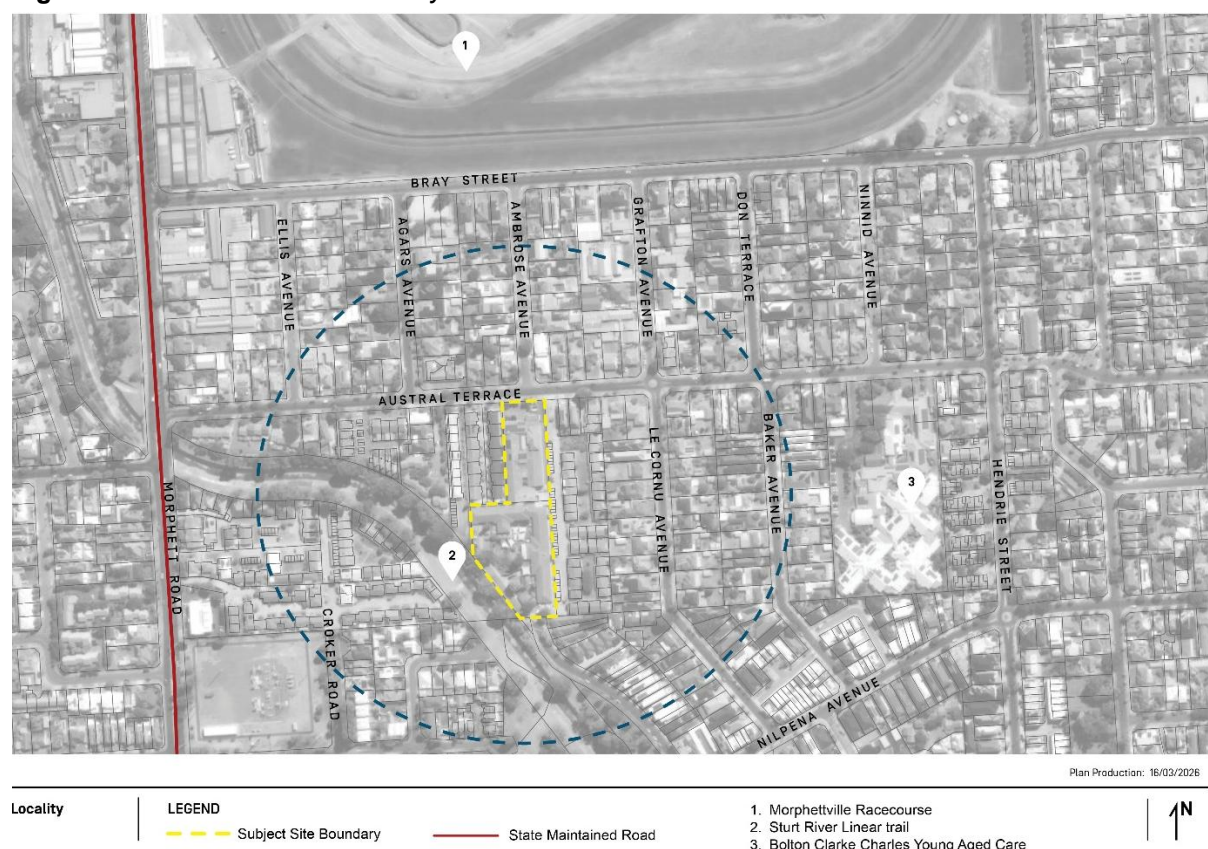
4. THE LOCALITY

Upon undertaking an inspection of the Site and its surroundings, the following was observed:

- The Site abuts Austral Terrace to the north and the terminus of Appleby Road to the south, both of which are under the care and control of local government;
- Sturt River Linear trail abuts the southwest edge of the Site, providing pedestrian and cycling connections to the north and south;
- The area is predominantly characterised by residential dwellings in the form of both detached dwellings and residential flat buildings;
 - » The eastern and western boundaries of the Site abut existing one-storey residential flat buildings;
 - » Recent residential development consisting of contemporary housing has established south of the Site, as a result of the redevelopment of dated housing stock;
- The Site is approximately 200 metres south of Morphettville Racecourse, which abuts Anzac Highway to the north;
- Bolton Clarke Charles Young Aged Care Facility approximately 250 metres to the west; and
- Morphett Road, a state-maintained road located approximately 300 metres to the west with public transport connection to the City and the coast.

The Site in relation to its immediate surroundings is captured in **Figure 4.1**.

Figure 4.1 *The Site and the Locality*



5. PROPOSED DEVELOPMENT

The proposed development includes a five-storey aged care facility comprising 35 resident rooms on the ground floor, 108 resident rooms on levels 1 and 2, as well as 16 independent living units (with a range of 1-, 2- and 3-bedroom arrangements) on level 3. The proposed development further incorporates a function space and roof top area providing additional amenities for residents. Other ancillary functions including café, consult room and hairdressers are generally limited to the ground floor with dining and lounge areas identified on each level. Overall, the proposed development comprises five (5) building levels.

Further details of the proposed development are depicted in the Architectural Drawings in **Appendix 1** and is further summarised below.

5.1 Land Use

Part 7 – Land Use Definitions of the Code includes residential care within the definition of ‘supported accommodation’:

“Supported accommodation means premises in which residential accommodation is provided to persons requiring/together with regular medical and/or personal care assistance, but does not include home care.

including: residential care.”

Residential care is defined as:

“Residential care has the same meaning as in the *Commonwealth Aged Care Act 1997*.”

Further, the *Commonwealth Aged Care Act 1997* define residential care as:

“Residential care is personal care or nursing care, or both personal care and nursing care, that:

(a) is provided to a person in a residential facility in which the person is also provided with accommodation that includes:

- i. appropriate staffing to meet the nursing and personal care needs of the person; and
- ii. meals and cleaning services; and
- iii. furnishings, furniture and equipment for the provision of that care and accommodation; and

(b) meets any other requirements specified in the *Subsidy Principles*.

However, residential care does not include any of the following:

- (a) care provided to a person in the person’s private home;
- (b) care provided in a hospital or in a psychiatric facility;
- (c) care provided in a facility that primarily provides care to people who are not frail and aged;
- (d) care that is specified in the *Subsidy Principles* not to be residential care.”

The Land Use Definitions Table in *Part 7 – Land Use Definitions* of the Code notes that supported accommodation excludes both a hospital and retirement facility.

The café, consult room, hairdresser on the ground floor is anticipated to provide amenities for both residents and visitors to provide a vibrant functional ground floor.

Therefore, these ancillary components are not regarded as separate 'elements' of the development.

5.2 Built Form

5.2.1 Accommodation Typologies

The proposed development comprises a total of 143 residential care rooms, and 16 supported living units, with a mix of one-, two- and three-bedroom apartments.

The residential care rooms represent a typical aged care facility typology, comprising a 26 square metre bedroom with ensuite, and communal dining lounge areas. This form of accommodation is limited to the ground level, and the first and second levels of the proposed development.

The supported living units located on level 3, each include a living area, kitchen, bathroom, and primary bedroom with ensuite. Units range in size with smaller two-bedroom units comprising an area of 87 square metres, and larger three-bedroom units containing an area of up to 140 square metres.

All bedrooms contain windows that provide outlook to either the public realm or to the private courtyards.

5.2.2 Building Composition

The ground floor in addition to the 35 resident rooms includes amenities such as a café, function room and hairdressers, as well as a consult room and reception area for visitors. Other service areas predominantly for the operation of the facility located on the ground floor include, kitchen, laundry, waste room, with ancillary waste rooms and storage areas located on upper levels.

Levels 1 to 2 contains residential care rooms together with communal dining and lounge areas, with independent living units located on level 3.

Level 4 contains a rooftop terrace area and activity room for the enjoyment of residents.

A landscape plan (**Appendix 4**) has been supplied to support this application including a variety of outdoor spaces, ranging from activity and communal spaces to sensory gardens for quiet reflection located around the exterior of the building.

5.2.3 Building Height

The building will have a maximum building height of 19.5 metres and 5 (five) levels. This maximum building height includes parapet and screening to the rooftop plant equipment and lift overruns.

5.2.4 External Materials

The building is of a contemporary design and will incorporate a range of high-quality and durable materials including:

- Colourbond Metal Cladding (light);
- Face brickwork with feature soldier coursing;
- Light Colour feature banding;
- Aluminium sun shading;
- Aluminium framed windows;
- Glazed balustrading;
- Folded Metal Facia;

Plant and necessary security fencing will consist of:

- Aluminium Plant Screening; and

- Metal Slat Security Screening Brick.

5.3 Demolition

As detailed on the staging Plan in **Appendix 1**, the proposed development involves the demolition of the existing buildings on the Site in a staged manner.

Demolition will be undertaken in stages and will need to be considered as part of this application as this does not meet the prescribed parameters of Schedule 4, Clause 10 of the PDI Regulations.

5.4 Fences

A number of fences are proposed, that will range in height between 1.2 and 3.6 metres and will be located along the perimeter of the Site extending from Austral Terrace to Appleby Road. The fences will comprise several materials, including solid Colourbond metal sheets, masonry entrance walls, acoustic barriers, and vertical metal battens.

The extent of the proposed fences is depicted in the Architectural Drawings in **Appendix 1**.

5.5 Advertisements

The proposed development includes four advertisements, as follows:

- one affixed to a 2-metre-high textured masonry wall located at the frontage of Austral Terrace;
- one affixed to a masonry wall at the main entrance to the facility, comprising a height of 1.4 metres; and
- a 2.2 metre high by 0.95 metre blade sign affixed to the 1.4 metre high textured masonry wall along the Appleby Road entrance; and
- a pylon sign with a 2.7 metre post height an affixed three face sign each comprising a face size of 1.2 metre x 0.7 metre, creating a total height of 3.9 metres fixed along Austral Terrace frontage.

All of the advertisements will display the Applicant's name and logo, and will be illuminated to a level which is appropriate to residential nature of the locality.

The proposed advertisements are detailed in the Architectural Drawings in **Appendix 1**.

5.6 Access and Parking

An assessment of the access, traffic generation and parking for the proposed development has been undertaken by CIRQA, which is included in **Appendix 2**.

The proposed development will gain access via a crossover from Austral Terrace and two separate, ingress and egress, crossovers onto Appleby Road, as follows:

- a crossover that will be altered to accommodation dual access from Austral Terrace; and
- a secondary access provided via a ingress crossover from Appleby Road, circulating vehicle traffic within the Site, to egress via a separate crossover onto Appleby Road.

Proposed ingress and egress points will be a result of alterations to existing vehicle access points to the Site.

The proposed development will provide 75 on-site car parking spaces, of which two (2) space will be reserved exclusively for use for persons with disabilities.

Parking associated with the independent living units is located to the north of the proposed facility and will be secured via a security gate. This parking area comprises 25 of the 75 on-site parking areas, with 6 spaces arranged in a stacked formation.

Loading areas are located on the eastern side of the proposed facility abutting back of house (BOH) facilities and bin storage areas.

5.7 Stormwater

CPR Engineers have been engaged to prepare a Stormwater Management Plan to support the proposed development, which is included in **Appendix 3**.

Relevant finished floor levels (FFL) set at 14.0 metres AHD has been proposed to minimise flood risk to building and occupants noting an approximately of 100mm of flooding in this location.

Stormwater generated by the development will be collected and discharged to the Council's underground stormwater drainage network.

During the initial stage of development, no detention of stormwater is required as this stage of development will result in decreased impervious areas, however this will need to be reviewed in the next phase of the design, once the stormwater layout is developed further.

The northern section of the site has an existing stormwater discharge point onto Austral Terrece, which will not be altered as part of this stage of development. The southern portion and subject of this application will require a new connection point into an existing side entry pit within Appleby Road

5.8 Waste

A Waste Management Plan has been prepared by CIRQA and is included in **Appendix 7**, which outlines the anticipate generated waste volumes across General Waste, Co-Mingled Recycling, Organics, Cardboard, Medical and Confidential Paper, requiring a total of 15 bins ranging in size from 1,100 litres to 240 litres.

Waste collection facilities have been located on the eastern portion of the facility with identified loading areas to undertake loading and unloading activities.

Waste collection will only occur during the specified times of the Local Nuisance and Litter Control Act 2016, that is:

- between 9.00am and 7.00pm on a Sunday or public holiday; and
- between 7.00am and 7.00pm on any other day.

5.9 Landscaping

A Landscape Concept Report has been prepared by Oxigen, which is included in **Appendix 4**.

The landscaping strategy has been designed with core principles of safety, sensory, accessibility, comfort and participation for the residents.

The landscaped gardens will comprise a range of activities and uses through the provision of a:

- Produce Garden, for residential and visitors to meet and be productive;
- Recreation Garden, stimulating group activities;
- Amenity Garden, providing a natural buffer between buildings and road interfaces; and
- Social Garden, spaces for activities such as markets, yoga and functions.

The proposed landscaping will incorporate cohesive infrastructure in the form of shaded pathways, raised garden beds, seating nodes, and native and climate-resilient planting to enhance biodiversity and promote interest and enjoyment within the outdoor environment.

6. PROCEDURAL MATTERS

6.1 Planning and Design Code Version

At the time of preparing this report, the relevant version of the Code was gazetted and subsequently consolidated on March 12, 2026 (Version 2026.5). Due to amendments, the version of the Code used to prepare this report may not be the relevant version at the time of lodgement of the application. To the extent of any inconsistency, the version of the Code at the time of lodgement will be relevant for the processing and assessment of the application.

6.2 Zone and Overlays

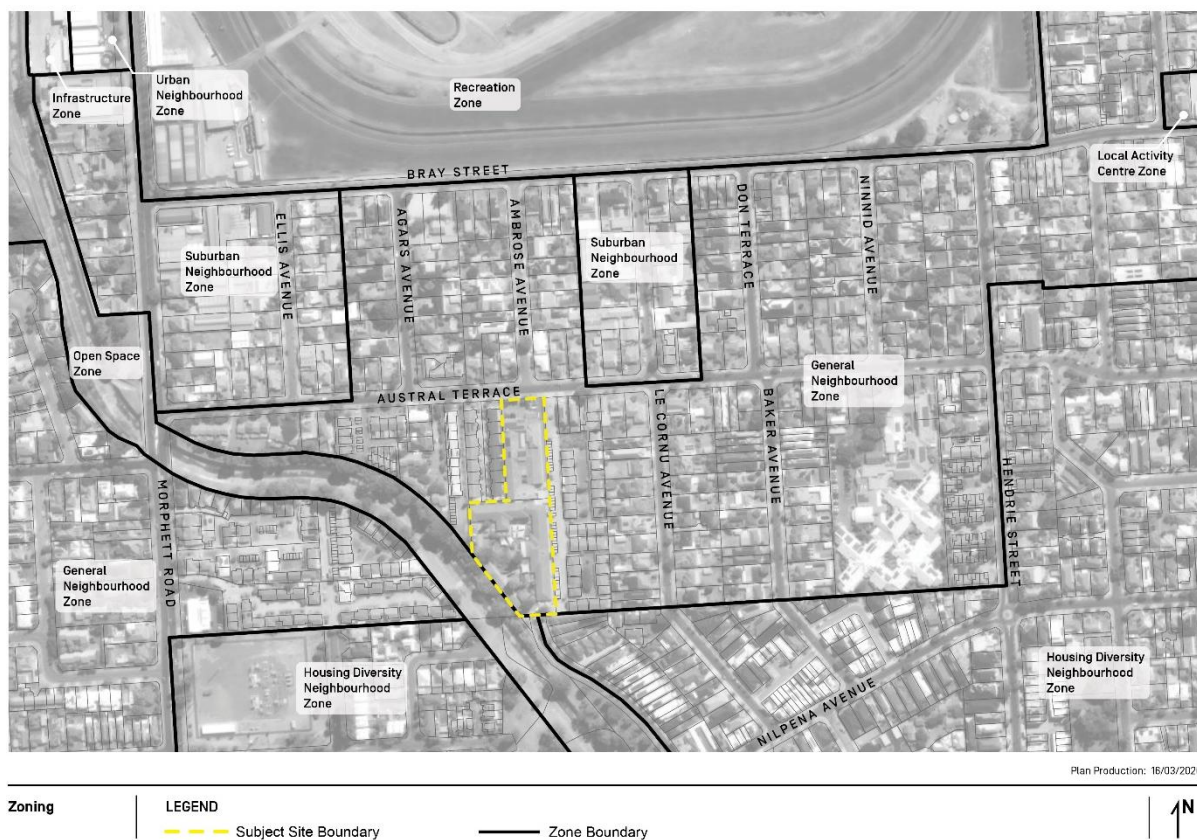
The Site is located entirely within the confines of the General Neighbourhood Zone (**GN Zone**).

The following Overlays apply to the Site:

- Airport Building Heights (Regulated) - All structures over 15 metres;
- Affordable Housing;
- Building Near Airfields;
- Hazards (Flooding - Evidence Required);
- Prescribed Wells Area;
- Regulated and Significant Tree;
- Stormwater Management;
- Significant Retirement Facility Supported Accommodation Sites;
- Urban Tree Canopy; and
- Water Resources.

The Site and the zoning are captured in **Figure 6.1** overleaf.

Figure 6.1 *The Site and the Zoning*



6.3 Relevant Authority

The State Planning Commission (**Commission**) is the relevant authority for assessment and determination of the development application pursuant to Section 94(1)(a)(ii) of the PDI Act, Regulation 23(1) of the PDI Regulations and Clause 4(1) in Schedule 6 of the PDI Regulations.

6.4 Referrals

6.4.1 Council

Pursuant to Regulation 23(2)(b) of the PDI Regulations, the application requires referral to the City of Marion (**Council**) for comments on technical matters as prescribed in Regulation 23(3), which includes:

- (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).*

In the absence of a Practice Direction being issued by the Commission, we submit that no other matters are prescribed for the purposes of sub-regulation (2)(b) and, as such, any commentary provided by the Council on matters not prescribed should be disregarded.

6.4.2 Sensitivity of Land Use

The proposed development is not considered a change in use as the Site currently operates as a residential care and supported accommodation facility. There is no proposed change of use and therefore the proposed development does not require a Preliminary Site Investigation Report as per *Practice Direction 14: Site Contamination Assessment*.

6.4.3 Overlays

The Site is subjected to the following Overlays that may require a referral, pursuant to Section 122(1) of the PDI Act, in accordance with Regulation 41(1), to a body prescribed in Schedule 9 of the PDI Regulations.

We submit the following comments in relation to the relevant referral triggers of each overlay:

Table 6.1 *Referral triggers*

Overlay	Referral	Comment
Airport Building Heights (Regulated)	Yes	The proposed development will be greater than 15 metres in height. Accordingly, referral is required to Adelaide Airport Limited.
Affordable Housing	No	The proposed development does not comprise dwellings. Accordingly, referral is not required to the South Australia Housing Trust.

6.5 Notification

Pursuant to Section 107(6) of the PDI Act, the Code may exclude specified classes of development from the requirement to undergo public consultation. Accordingly, *Table 5 – Procedural Matters (PM) – Notification (Table 5)* of the Zone prescribes the following relevant matters:

Table 6.2 *Table 5 of the Zone (excerpt)*

Class of Development (Column A)	Exceptions (Column B)
3. Any development involving any of the following (or of any combination of any of the following): (g) supported accommodation	Except development that: 1. does not satisfy General Neighbourhood Zone DTS/DPF 4.1 or 2. involves a building wall (or structure) that is proposed to be situated on (or abut) an allotment boundary (not being a boundary with a primary street or secondary street or an excluded boundary) and: a. the length of the proposed wall (or structure) exceeds 11.5m (other than where the proposed wall abuts an existing wall or structure of greater length on the adjoining allotment) or b. the height of the proposed wall (or post height) exceeds 3m measured from the top of footings (other than where the proposed wall (or post) abuts an existing wall or structure of greater height on the adjoining allotment).
4. Any development involving any of the following (or of any combination of any of the following): (q) tree damaging activity (d) fence	None specified
10. Demolition	Except any of the following: 1. the demolition (or partial demolition) of a State or Local Heritage Place (other than an excluded building) 2. the demolition (or partial demolition) of a building in a Historic Area Overlay (other than an excluded building).

The proposed development is required to undergo notification, as prescribed in Section 107(3) of the PDI Act, noting that the building will exceed the maximum building height specified in DTS/DPF 4.1 of the Zone, and *advertisement* is not specifically excluded under Table 5 of the Zone.

7. ASSESSMENT AGAINST PLANNING AND DESIGN CODE

The application is Code Assessed – Performance Assessed by virtue of not comprising an accepted, deemed to satisfy or restricted class of Development within the Zone.

Part 1 – Rules of Interpretation is highly pertinent in this instance which informs that where there is an inconsistency between provisions in the relevant policies for a particular development, and for the purpose of section 66(3)(b) of the Act, the following rules will apply to the extent of any inconsistency between policies:

- the provisions of an overlay will prevail over all other policies applying in the particular case; and
- a subzone policy will prevail over a zone policy or a general development policy; and
- a zone policy will prevail over a general development policy.

Part 1 – Rules of Interpretation, Policies – Desired Outcomes and Performance Outcomes of the Code establishes that Desired Outcomes (DOs) and Performance Outcomes (POs) are the applicable policies to *performance assessed* development.

It is also worth noting that some POs have a standard outcome that is considered to satisfy the corresponding PO, referred to as Designated Performance Features (DPFs). The Rules of Interpretation within Part 1 of the Code state the following in relation to DPFs (underlining our emphasis):

“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.”

It is noted the ERD Court has recently provided guidance with respect to the interpretation of the Code, more particularly the manner in which DPFs are to be viewed in the context of a planning assessment. In *Garden College v City of Salisbury [2022] SAERDC 10*, the full Court held;

“That said, it must not be overlooked that the way in which the DTS/DPF criteria serve a procedural function is through the intermediary of a procedural table specifying classes of development excluded from public notification and exceptions to such exclusions that incorporate such criteria by reference. It does not follow where the satisfaction of DTS/DPF criteria excludes performance assessed development from public notification, a relevant authority would be prevented from deciding not to grant planning consent on the elements of a development requiring a merits assessment against the Code. Indeed, s107(8) and the Code Rules of Interpretation make it plain that satisfaction of DTS or DPF criteria does not derogate from the relevant authority’s discretion to determine the outcome on a merits assessment against all relevant provisions of the Code, including any relevant corresponding POs and DOs.”

As a result of the above, the assessment below focusses on the applicable DOs and POs and may only refer to the DPF in instances where it assists in the exercise of discretion.

7.1 Land Use

The suitability of the proposed land use is instructed by the relevant policies within the Significant Retirement Facility and Supported Accommodation Sites which seeks for the development of supported accommodation and/or retirement facilities on significant retirement facility and supported accommodation sites to provide accommodation for the communities’ ageing residents.

Notwithstanding the GN Zone, the inclusion of the proposed development in the Significant Retirement Facility and Supported Accommodation Sites Overlay ensures an appropriate land use.

Furthermore, the ancillary uses, including all shops, offices and consulting rooms are subordinate to, and associated with a retirement facility and/or supported accommodation on a significant retirement facility and supported accommodation site.

7.2 Built Form and Character

7.2.1 Siting

The proposed development is appropriately sited, noting that the building will be located centrally within the southern portion of the Site replacing the existing supported accommodation building. The proposed development will result in a site coverage of approximately 28% across the total Site. Further the proposed development will incorporate well considered landscaping design, providing attractive outlook for residents, with access to light and ventilation.

The Significant Retirement Facility and Supported Accommodation Sites Overlay, via PO 2.2, seeks for 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, with 30-degree (south only) 45-degree interface plane offering guidance to the achievement of PO 2.2. Figures 7.1 to 7.4 provide purple shading where the extent of the building breaches the numeric guidance of DPF 2.2 of the Overlay, along with imagery taken from a drone to enable the adjoining land to be considered.

Figure 7.1 30 and 45-degree Setback Plane – View from Northwest

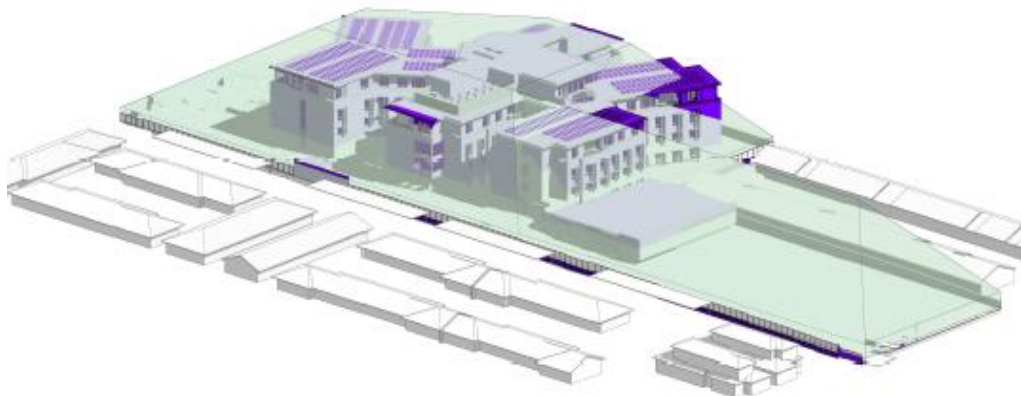


Figure 7.2 Site and Adjoining Land to the East



On review of Figure 7.2, the breach is trivial, and will be located adjacent bin storage areas, extensive banks of carports and a common driveway, with PO 2.2 clearly achieved.

Turning to Figure 7.3, three departures are noted in the 45-degree numeric guide offered by DPF 2.2.

Figure 7.4 highlights the adjacency of the extensive road and drainage reserve, along with the subject site itself, with it clear that there will be no impact beyond the extent considered by the Code.

Figure 7.3 30 and 45-degree Setback Plane – View from Southwest

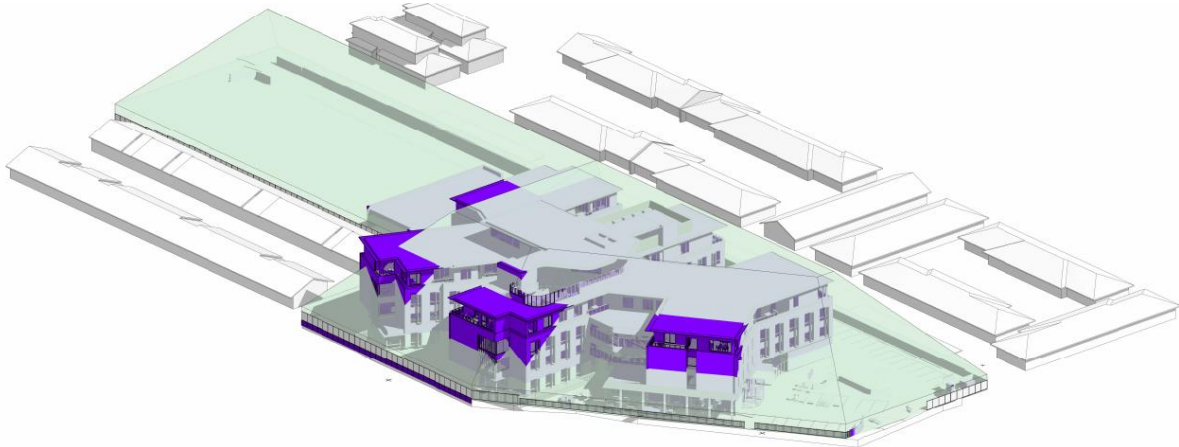


Figure 7.4 Site and Adjoining Land - View from Southwest



Finally, the corner “finger” adjacent the residential flat buildings to the north will be equally balanced with negative space where the building comfortably exceeds the DPF guide.

The drone footage confirms that the building will be located adjacent two carports with a lack of windows on their southern boundary.

Figure 7.5 *Adjoining Buildings to the North*



Accordingly, the proposed development is highly articulated and set well back from streetscapes. The design offers a low site coverage and will minimise impacts on local streetscapes and adjacent residential uses with regard to overshadowing, massing and building proportions.

7.2.2 Building Height and Form

DPF 2.1 of the Significant Retirement Facility and Supported Accommodation Sites Overlay provides the following numeric guidance:

DTS/DPF 2.1 *Buildings for, or associated with, supported accommodation and/or a retirement facility on a significant retirement facility and supported accommodation site do not exceed:*

(a) 4 levels and 15m in height on sites between 6,500m² up to 10,000m² in area

or

(b) 6 levels and 22m in height on sites over 10,000m² in area.

The proposed development is located on a Site of 10,188 square metres and will result in five (5) building levels including a roof top terrace and activity space for the enjoyment of residents.

The building will have a maximum height of 19.5 metres including the rooftop plant equipment screen.

The building is therefore under the 6 levels and 22 metres height offered by the numeric guide of DPF 2.1.

Noting the resolution of setbacks as previously established in this report, it is reasonable to conclude that the development will be consistent with PO 2.1 of the Significant Retirement Facility and Supported Accommodation Sites Overlay, which is provided below for clarity:

PO 2.1 *Buildings for, or associated with, supported accommodation and/or retirement facilities on a significant retirement facility and supported accommodation site are consistent with the form expressed in DTS/DPF 2.1 or positively responds to the local context, provided that off-site impacts can be managed.*

7.2.3 External Appearance

In respect to external appearance, the Design in Urban Areas states:

PO 12.3 *Buildings are designed to reduce visual mass by breaking up building elevations into distinct elements.*

PO 12.5 *External materials and finishes are durable and age well to minimise ongoing maintenance requirements.*

PO 12.7 *Entrances to multi-storey buildings are safe, attractive, welcoming, functional and contribute to streetscape character.*

PO 12.8 *Building services, plant and mechanical equipment are screened from the public realm.*

The building design incorporates a central spine with smaller ‘fingers’ expanding from the centre reducing the visual extent of bulk and scale of the built form. Further, the proposed development incorporates comprehensive landscaping between the building to improve the amenity of residents, visitors and any views captured from the Sturt River Liner Park, satisfying PO 12.3.

The proposed development utilises high quality and durable materials consisting of a mix of glass, aluminium fittings, Colourbond cladding and masonry entry walls. It is anticipated the use of such materials will help to provide visual interest and minimise ongoing maintenance requirements consistent with PO 12.5.

The proposal has considered the location of necessary plant equipment and loading areas, incorporating all plant equipment on the roof of the proposed development and limiting loading areas centrally within the site, treated with appropriate screening materials. All services and equipment associated the general operation of the facility is not anticipated to be visible from the streetscape. Further all fencing and signage has been designed to create interest through the implantation of a mix of fencing treatments. We submit the considered design and implementation of materials creates an identifiable entrance which is separates visitors and the public from necessary service areas, satisfying PO 12.7 and 12.8

7.3 Interface between Land Uses

DO 1 for the Interface between Land Uses Section of the Code seeks for development to mitigate adverse impacts on the amenity of sensitive receivers, as follows:

DO 1 *Development is located and designed to mitigate adverse effects on or from neighbouring and proximate land uses.*

7.3.1 Noise

Interface between Land Uses Section of the Code seek the following in regards to a development’s impact to nearby sensitive receivers:

PO 1.2 *Development adjacent to a site containing a sensitive receiver (or lawfully approved sensitive receiver) or zone primarily intended to accommodate sensitive receivers is designed to minimise adverse impacts.*

PO 4.1 *Development that emits noise (other than music) does not unreasonably impact the amenity of sensitive receivers (or lawfully approved sensitive receivers).*

An Environmental Noise Assessment has been prepared by Echo Acoustics (March 13, 2026) to assess potential noise impacts associated with the redevelopment of the existing Bupa aged care facility at 29–31 Austral Terrace, Morphetville. The proposal involves demolition of the existing buildings and construction of a new five-storey aged care facility with associated car parking, loading areas and outdoor spaces.

The assessment considers operational noise sources likely to be generated by the development, including vehicle movements within the car park, delivery and loading activities, outdoor social interaction by residents and visitors, mechanical plant and equipment (such as air-conditioning and ventilation systems), and emergency infrastructure including generators and fire pumps. Noise predictions were undertaken using recognised acoustic modelling inputs derived from comparable facilities and manufacturer data.

The Site and surrounding dwellings are primarily located within the General Neighbourhood Zone of the Planning and Design Code, where residential amenity is a key consideration. Sensitive receivers were therefore identified at the closest surrounding dwellings and predicted noise levels were assessed against the Environment Protection (Commercial and Industrial Noise) Policy 2023, which establishes the relevant criteria for non-residential noise emissions.

The assessment adopts noise criteria of 52 dB(A) during the day for regular operational activity, 62 dB(A) for short duration daytime events such as deliveries, and 45 dB(A) during night periods. Acoustic modelling demonstrates that predicted noise levels at all assessed receivers comply with these criteria. Accordingly, the development is not expected to unreasonably impact the acoustic amenity of nearby residential dwellings.

The assessment concludes that, subject to the implementation of recommended operational and design mitigation measures, the development satisfies the relevant environmental noise provisions of the Planning and Design Code.

Recommended noise control measures are highlighted below for clarity:

- Restrict delivery activities to 9:00am–8:00pm on Sundays and 8:00am–8:00pm on all other days.
- Implement operational measures to minimise noise associated with delivery and loading activities.
- Construct solid acoustic boundary fencing adjacent to the car park and loading areas.
- Incorporate acoustic absorption material to the underside of the assisted living apartment car park roof.
- Ensure car park grates, drains and ramps are securely fixed to prevent excessive impact noise.
- Ensure alarms, speakers or similar devices are inaudible at nearby residential receivers.
- Ensure waste storage and collection occurs within the hours specified under the *Local Nuisance and Litter Control Act 2016*.
- Ensure mechanical plant and equipment, including generators and fire pumps, are designed and screened to comply with the *Environment Protection (Commercial and Industrial Noise) Policy 2023*.

7.3.2 Overlooking

In relation to overlooking, the Design in Urban Areas Section of the Code seeks:

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.*

Direct overlooking is defined in the Code as:

“In relation to 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”.

As discussed previously within this report, building design incorporates a considered central spine from which residential units and rooms expand from seeking to orientate outlook internally or towards the Sturt River Linear Park. The proposed development limits balconies to the Level 3 (Independent Living Units), which generally supports outlook internally within the Site with the exception of Apartment 4, 16 and 17.

Each of these identified apartments comprises a balcony with a leading outlook external to the Site. Apartments 4 and 17 overlook to the east, however this is limited to the proposed drive aisle of the Site, and neighbouring vehicle access driveway and carports. It is not considered this design will result in significant overlooking into private open spaces of neighbouring residential units. Apartment 16 has a leading outlook towards the north, which is generally limited to the central common driveway of the residential flat buildings abutting the Site.

Levels 1 and 2 are limited to windows, with the intention residents will maximise the use of shared facilities including internal activity, sitting rooms and outdoor landscaped areas.

Based on the proposed design we submit there is negligible overlooking generated from the proposed development, satisfying PO 16.1.

7.3.3 Overshadowing

In relation to overshadowing, the Interface Between Land uses Section of the Code seeks:

PO 3.1 *Overshadowing of habitable room windows of adjacent residential land uses in:*

- a. *a neighbourhood-type zone is minimised to maintain access to direct winter sunlight*
- b. *other zones is managed to enable access to direct winter sunlight.*

PO 3.2 *Overshadowing of the primary area of private open space or communal open space of adjacent residential land uses in:*

- a. *a neighbourhood type zone is minimised to maintain access to direct winter sunlight*
- b. *other zones is managed to enable access to direct winter sunlight.*

Overshadowing diagrams are included in the Architectural Drawings in **Appendix 1**. These provide a comparison of the existing extent of overshadowing, together with that of the proposed development, during both summer and winter.

Overshadowing has been minimised to the adjacent residential land uses within the General Neighbourhood Zone, largely due to the generous setbacks. The overshadowing diagrams demonstrate that the proposed development will still provide a minimum of three hours of direct winter sunlight to the adjacent residential land uses, and therefore, satisfies POs 3.1 and 3.2 of the Design in Urban Areas Section of the Code.

Finally, I again return to the clear intent of the Significant Retirement Facility and Supported Accommodation Sites Overlay which seeks increased height on larger sites, such as that proposed.

7.3.4 Lighting

No lighting poles are proposed.

Lighting, in its own right, does not constitute development. Even so, the Proponent is willing to abide by a condition of consent, should it be forthcoming, to adhere to the Australian Standards relating to the obtrusive impacts of light spill.

7.4 Access, Traffic and Parking

A comprehensive assessment of the access, traffic generation and parking for the proposed development has been undertaken by CIRQA, which is included in **Appendix 2**.

7.4.1 Access

In relation to access, the Transport, Access and Parking Section of the Code seeks:

- PO 3.1** *Safe and convenient access minimises impact or interruption on the operation of public roads.*
- PO 3.3** *Access points are sited and designed to accommodate the type and volume of traffic likely to be generated by the development or land use.*
- PO 3.5** *Access points are located so as not to interfere with street trees, existing street furniture (including directional signs, lighting, seating and weather shelters) or infrastructure services to maintain the appearance of the streetscape, preserve local amenity and minimise disruption to utility infrastructure assets.*

The proposed development responds positively to the abovementioned policies of the Transport, Access and Parking Section of the Code, as follows:

- Vehicle access to the Site will be provided via altered driveway crossovers on both Austral Terrace and Appleby Terrace, which will be safe and convenient, as sought by PO 3.1 of the Transport, Access and Parking Section of the Code;
- The northern access point to Austral Terrace will accommodate two-way simultaneous movements of vehicles and the southern access points have been designed to each support an egress and separate ingress, which satisfies PO 3.3 of the Transport, Access and Parking Section of the Code;
- The proposed development has been designed to accommodate forward-in and forward-out access for vehicles up to 10 metres in length, which will readily accommodate emergency, refuse and general service vehicle access to/from the Site; and
- The proposed development does not require the relocation or alterations to existing street infrastructure or trees consistent with PO 3.5.

7.4.2 Traffic Generation

The proposed development is forecast to generate in the order of 48 trips in the am peak hour and 27 trips in the pm peak hour. As advised by CIRQA, these traffic volumes are well within the capacity of the Site's two-way access point and will be appropriately accommodated with relatively low levels of queuing and delay. CIRQA also advise that this number of movements is a proposed to increase of 49 trips per a day based on the existing use, which has been accommodated for via the alterations to existing access points.

7.4.3 Car Parking

Table 1 of the Transport, Access and Parking Section of the Code designates that car parking for:

- supported accommodation should be provided at a rate of 0.3 spaces per bed.
- Retirement facility should be provided at a rate of:
 - 1 space per a dwelling with 1 or 2 bedrooms;
 - 2 spaces per a dwelling with 3 or more bedrooms; and
 - 0.2 space per a dwelling for visitors.

Based on this rate, the proposed development will have a theoretical requirement for 71 car parking spaces.

The proposed development includes 75 on-site car parking spaces and therefore satisfies the envisaged parking rates of the Code.

The proposed development therefore provides sufficient on-site vehicle parking, and satisfies PO 5.1 of the Transport, Access and Parking Section of the Code.

As confirmed by CIRQA, the parking areas, including parking space dimensions, aisle widths, provision of parking for people with disabilities, have all been designed to comply with the requirements of the Australian and New Zealand Standards.

7.5 Regulated and Significant Trees

The Site contains three (3) significant, five (5) regulated and two (2) exempt trees, as identified within the Arborist Report (**Appendix 6**).

The proposed development will require the removal of five (5) regulated trees and two (2) significant trees.

In relation to regulated and significant trees, the Regulated and Significant Tree Overlay seeks:

PO 1.1 *Regulated trees are retained where they:*

- (a) make an important visual contribution to local character and amenity*
- (b) are indigenous to the local area and listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species*
- (c) and / or*
- (d) provide an important habitat for native fauna.*

PO 1.2 *Significant trees are retained where they:*

- (a) make an important contribution to the character or amenity of the local area*
- (b) are indigenous to the local area and are listed under the National Parks and Wildlife Act 1972 as a rare or endangered native species*
- (c) represent an important habitat for native fauna*
- (d) are part of a wildlife corridor of a remnant area of native vegetation*
- (e) are important to the maintenance of biodiversity in the local environment and / or*
- (f) form a notable visual element to the landscape of the local area.*

The Arborist Report outlines each of the identified regulated trees for removal (trees 1, 2, 3, 4, 8, 9 and 10) have a low to moderate retention rating. Larger significant trees within the Sturt River Linear Park have been identified with 'High' retention ratings, with a fair overall condition. The proposed development will seek limit any impacts of the identified trees within the Sturt River Linear Park and provide an improved habitat for native fauna through considered landscaping incorporating native and drought tolerant species.

We submit the removal of the existing regulated trees on Site for reasonable development will be supplemented by the coordinated landscaping of the site to provide a enjoyable amenity for residents and improve the habitat for flora and fauna within the Site.

7.6 Stormwater Management

The Proponent engaged CPR Engineers to ensure that stormwater is able to be appropriately managed as a result of the proposed development, as well as meet the stormwater requirements of the City of Marion.

The Stormwater Management Plan provided in **Appendix 3** advises that:

- Development will not increase the risk of flooding to downstream properties or add any significant pollutant load;
- Surface water runoff will be appropriately treated to remove gross pollutants and improve the quality of water being discharged into the Council's stormwater network;
- FFL has been set at 14.0 mAHD which is a minimum of 400 mm above existing levels in the flood prone areas;
- Perimeter pavements around the buildings shall grade away from the building and as such direct any change for overland flows to elsewhere on the Site; and
- The finished floor levels have been design ed to ensure that the entry of floodwaters is prevented, which satisfies PO 2.1 of the Hazards (Flooding – General) Overlay.

7.7 Waste Management

A Waste Management Plan has been prepared by CIRQA and is included in **Appendix 7**. This outlines the way in which waste generated by the proposed development will be managed, and is summarised as follows:

- Staff will be responsible for maintaining bins throughout the facility;
- General waste/landfill, mixed recycling, and organics/food waste will be transferred to, and stored within, the bin storage room on the ground floor;
- Clinical/cytotoxic waste will be disposed to dedicated bins in designated utility rooms;
- Bins will be collected by a private contractor, generally using a rear lift truck up to 11.0 metres in length; and
- As demonstrated within the Traffic and Parking Report in **Appendix 5**, refuse vehicles will be able to enter the Site in a forward direction, then reverse and store within the loading bay, and then exit the Site in a forward direction;

An overview of the number of bins required for the proposed development and the waste collection frequency is illustrated in **Figure 8.1** below.

Figure 7.6 *Waste volumes, bin numbers and collection frequency*

Waste Stream	Bin Size	# of bins	Capacity	Service Rate
General Waste	1,100 L	4	4,400 L	four times per week
Co-Mingled Recycling	1,100 L	3	3,300 L	twice per week
Green Organics	660 L	3	1,980 L	three times per week
Cardboard	660 L	3	1,980 L	twice per week
Clinical/Medical	240 L	1	240 L	once per week
Confidential Paper	240 L	1	240 L	once per week

The proposed development is therefore considered to achieve the envisaged development outcomes as detailed in POs 11.1 – 11.5 of the Design in Urban Areas section of the Code.

7.8 Landscaping

In relation to landscaping, the Design in Urban Areas Section of the Code seeks:

PO 3.1 *Soft landscaping and tree planting are incorporated to:*

- (a) minimise heat absorption and reflection*
- (b) maximise shade and shelter*
- (c) maximise stormwater infiltration*
- (d) enhance the appearance of land and streetscapes.*

PO 7.5 *Street level parking areas incorporate soft landscaping to improve visual appearance when viewed from within the site and from public places.*

PO 7.6 *Vehicle parking areas and associated driveways are landscaped to provide shade and positively contribute to amenity.*

A Landscape Concept Report has been prepared by Oxigen for the proposed development, and is included in **Appendix 4**.

Overall, the proposed landscaping will enhance the visual appearance of the development when viewed from the street, and enhance the amenity of the Site and locality. It will comprise a mix of trees, shrubs and groundcovers of various heights to complement the scale of the proposed building, minimise heat absorption, maximise shade and shelter, and maximise stormwater infiltration, which satisfies POs 3.1, 7.5 and 7.6 of the Design in Urban Areas Section of the Code.

7.9 Advertisements

DO 1 for the Advertisements Section of the Code seeks:

DO 1 *Advertisements and advertising hoardings are appropriate to context, efficient and effective in communicating with the public, limited in number to avoid clutter, and do not create hazard.*

The proposed advertisements satisfy the relevant policies of the Advertisements Section of the Code, noting that:

- The advertisements are integrated in the design of the building and fences, as sought by PO 1.1 of the Advertisements Section of the Code;
- None of the advertisements will encroach on public land, which satisfies PO 1.3 of the Advertisements Section of the Code;
- The proposed advertisements are of a scale and size appropriate for the building, the Site and the character of the locality, as sought by PO 1.5 of the Advertisements Section of the Code;
- The advertisements are limited in number, with two facing Appleby Road and two facing Austral Terrace, so as to avoid visual clutter and untidiness, as sought by PO 2.3 of the Advertisements Section of the Code;
- The signage relates entirely to the proposed land use to provide the ready identification of the business, as sought by PO 3.1 of the Advertisements Section of the Code; and
- The signs will be internally illuminated to an appropriate luminance as to not distract or cause nuisance, nor result in an amenity impact to nearby sensitive receivers, and are appropriately sited to not obstruct sightlines, as sought by POs 4.1, 5.2, 5.4 and 5.6 of the Advertisements Section of the Code.

8. CONCLUSION

We have concluded from our assessment of the proposed development that it is deserving of Planning Consent.

In support of our conclusion, we wish to highlight that:

- the land use is expressly sought within the Significant Retirement Facility and Supported Accommodation Sites Overlay;
- the siting and height of the building is appropriate noting the large site, clear policy intent and well considered architecture;
- the building is designed with high architectural merit, with articulation and a mix of external materials and finishes to reduce the visual bulk and scale;
- noise emanating from the Site for nearby sensitive receivers will not exceed levels contemplated by the *Environment Protection (Commercial and Industrial Noise) Policy 2023*;
- direct overlooking will not occur;
- all expected vehicles will be able to enter and exit the Site in a forward direction and manoeuvre the Site safely and conveniently;
- the traffic that is likely to be generated will be low and will be readily accommodated on the adjacent road network with minimal impact upon its operation;
- there will be sufficient on-site vehicle and bicycle parking provided for staff and visitors;
- stormwater will be suitably managed and discharged at an appropriate discharge rate so as to not overload the Council's stormwater network;
- soft landscaping is proposed to soften the visual appearance of the development and locality;
- the proposed development will not result in tree-damaging activity, and in particular, will not impact any of the Council's street trees that are adjacent the Site; and
- the proposed development will provide for safe and effective waste management.