

21 April 2021



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

**Attention: Nicholas Kretschmer – Planning Officer**  
City and Inner Metro Development Assessment  
Planning & Land Use Services | Attorney-General's Department

Dear Commission

**INFORMAL REFERRAL COMMENTS – DA 090/E024/21  
7-21 VICTORIA STREET GOODWOOD**

Thank you for the informal referral received on the 10 March 2021 of the above-mentioned application lodged with the State Commission Assessment Panel (SCAP), and invitation for comment within 6 weeks (21 April 2021) to assist the assessment process.

The nature of development encompasses:

*Demolition of existing, vacant single-storey nursing home and construction of a two (2) storey, 100-bed nursing home with associated fencing, car-parking and landscaping.*

Council seeks to provide comment on critical Council matters and key local planning matters that require further analysis and assessment by SCAP (State Commission Assessment Panel) pursuant to Section 33(1) of the Development Act 1993 and Regulation 38(2) of the Development Regulations 2008 in relation to such applications 'called-in' for SCAP determination by the State Coordinator General.

**Proposed Comments Summary**

New development is welcomed that leads to the sensitive growth, diversity and servicing of the needs of the city and community, while maintaining the integrity, character and amenity of neighbourhoods and the function of the local road network.

The Residential Streetscape (Landscape) Zone Policy Area 11.1 and policy parameters derive from well-established urban design principles, comprehensive local ('place') contextual analysis and subsequent extensive community engagement to maintain the integrity and character of the established low-density neighbourhoods and intrinsic traditional dwellings.

The proposed development replaces an existing large single-storey nursing home and a dwelling. The replacement is a larger two-storey building, but it is recognised as a large atypical site with a well-considered design, reflecting local building composition and features, affording a well landscaped setting and generally respectful of the neighbourhood character.

There is broad regard for the intent of the zone for low-rise well-articulated building forms and a reasonable re-development of an existing large site per policy to allow for increased density and height while respecting the external compatibility with the surrounding locality. Generally, the proposal is a positive redevelopment. There are a number of variations, some limited and others more significant, which warrant careful attention.

The range of matters and comments raised in this report that require attention and careful consideration by the SCAP as part of the assessment process, include:

- Development comprises a comprehensive re-development, expanded site and increase in built scale and intensity of nursing home from 84 to 100 beds;
- Favourable containment of main parking and all services in a full basement;
- Beneficial optimisation of ground level open/green space, a contained building foot-print and reasonable boundary setbacks and overall generous landscaped setting;
- High deep soil and green canopy provision exceeding minimum required 15%;
- Building is two-storey but of large scale at 8 metres to walls and flat roof portions and 10 metres to gable ridge, and overall a large building;
- Design approach has reflected building features of the area and endeavoured to articulate the main building forms, composition and detailing to mitigate scale;
- Front street setback varied but limited for large building and reduced compared to larger minimum setbacks and lower dwelling scale and composition in locality and posing some conflict with street tree canopies;
- Victoria Street fence design appropriate and with transparent infill sections but height should be maximum of 1.8 metres, not scaled height from plans of 2.3 metres, to reflect residential nature of locality;
- Generous east side setback, relative to larger building scale, of 6.1 metres;
- Generous west setback and well landscaped open space area;
- Rear boundary setbacks varied with portions at 6.1 to 7.8 metres reflective of setbacks policy but encroaching within 30-degree zone building envelope;
- Overshadowing reasonably limited with good setbacks relative to height;
- Overlooking addressed by some appropriate window orientation, but detail lacking for areas of glazing affording direct views to adjacent properties;
- Generous total of 60 on-site vehicle parking spaces, plus some motor bike and bicycle spaces, exceeding normal standard requirement of 33 spaces;
- On-street parking for further visitor parking largely maintained with slight reduction from 15 to 14 spaces;
- Consolidation of vehicle crossovers noted but the two for direct access double staff parks with loss of on-street parks is questioned;

- Loss of a substantial street tree for main vehicle access is not supported and should be avoided with driveway realignment, and on-site parking, reconfigured;
- Western side of central drop-off area crossover appears to conflict with street tree, leading to unwarranted likely damage/loss of a substantial street tree;
- Limited traffic increases due to limited increase in intensity of facility and nature of Victoria Street affording reasonable capacity;
- Sight line requirements for some street crossovers noted as not strictly met;
- Favourable waste and service provision, forward site access and egress for vehicles and all loading and servicing to occur on-site within basement area;
- Positive flood and stormwater management with generous pervious area, on-site detention and retention tanks to limit peak discharge rate;
- Planning Consent conditions, in event of approval.

Council has delegations to the Chief Executive Officer or his nominee(s) the authority to negotiate appropriate outcomes regarding street trees and future public realm upgrades in the event the application is approved.

### **Discussion**

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

It is appreciated Council's primary role is to comment on direct implications to the local area but also there is an opportunity for observations in relation to planning assessment matters to highlight key issues that require further analysis / assessment by PLUS officers and SCAP.

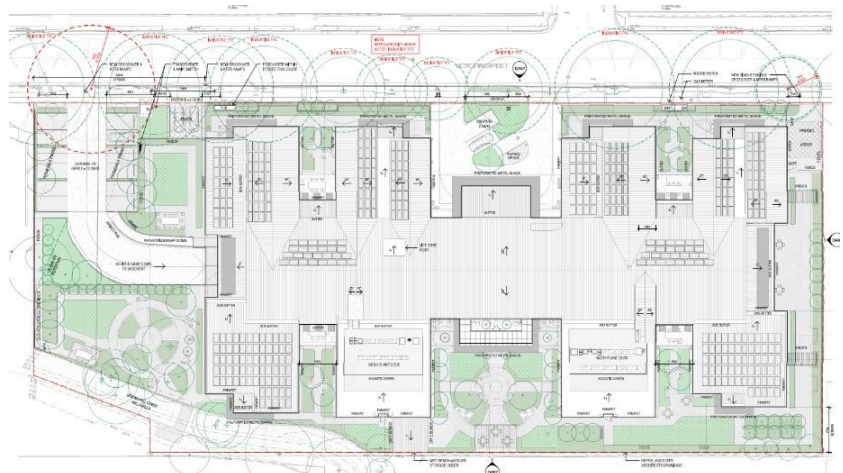
### ***Proposed Development Planning Observations***

In brief, the proposed development encompasses the following key features and concerns:

- The Residential Streetscape (Landscape) Zone Policy Area 11.1 – seeks the enhancement of the distinctive and primarily single-storey coherent streetscapes, residential land use, primarily street-fronting dwellings on sites a minimum of 300m<sup>2</sup> and sensitive in-fill development, where appropriate and complementary to the desired character and streetscape setting, or providing for the improvement of areas of variable character by replacing discordant buildings and landscaping;
- Development comprises a comprehensive re-development, expanded site and increase in built scale and intensity of nursing home from 84 to 100 beds;
- Site comprises current nursing home at 7-19 and old house to west at 21 to provide a street frontage of approximately 137 metres, with majority a depth of 96 metres and a very large site of approximately 8,100m<sup>2</sup>;



- Height of two (2) storeys but large scale of 8 metres to walls and flat roof portions and 10 metres to gable ridge, resulting in a substantial building overall. Zone policy typically seeks a single storey scale to the streetscape with second storey elements integrated sympathetically, primarily into the roof, with massing or evident wall heights not imposing on view from the street or on neighbouring spacious conditions. General residential policy though, further provides, that sites greater than 5,000m<sup>2</sup> should be developed in an efficient and co-ordinated manner to increase housing choice by providing dwellings, supported accommodation or institutional housing facilities at densities higher than, but compatible with, adjoining residential development;
- Regard for the existing land use, building density and scale together with policy for large sites, supports a refined re-development with potential increased intensity and building height while compatible with general character of locality and improved overall site function, appropriate building setting and landscaping;
- Current building, albeit single-storey has a high site cover, small setbacks and compromised function, eg restricted servicing and on-site parking;
- Proposed building footprint is reduced and reflective of typical residential policy at approximately 45%, with estimated hard paving of 20% and landscape areas of 35%;



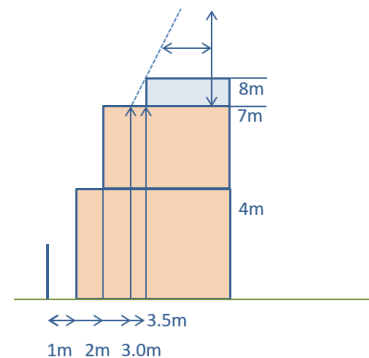
- Provision of generous deep soil area of approximately 35% (minimum 15% required for sites greater than 3,000m<sup>2</sup>) with a generous provision of tree canopy of approximately 20% (15% new trees and 5% borrowed from street trees);
- Landscape Plan fails to allocate indicated species to locations on plans to gauge the true effect of the planting, and this should be addressed before final approval;
- Front street setback building proportions well-articulated, limited and varied across the large site frontage with projecting portions of approximately 16 metres wide by 8 and 10 metres high being set mainly at 4.2 metres with smaller portions at 3.6 and 6.2 metres.

Setback unduly limited for the large building scale and compared to setbacks of typically 5 metres for composition of smaller dwellings 10 metres wide and 4.0 and 6.0 metres high predominant opposite the site and in locality.

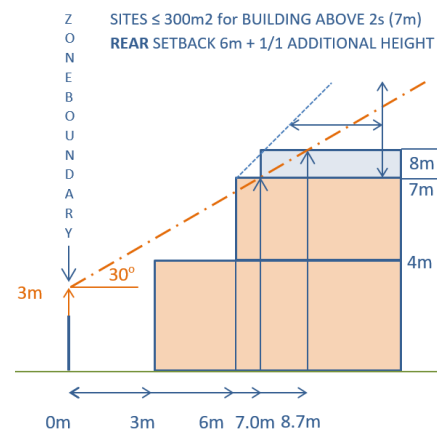
This leads to an evident intrusion of upper levels into the street tree canopies and also that care will be required to avoid damage from building to trees root zones; A greater setback should be provided, plus increased articulation of building composition through facade materials mix, fenestration, canopies and landscaping;

- Proposed building has generous eastern side setback, even relative to large 8 metre scale, of 6.1 metres and exceeding typical boundary setback policy of 3.5 metres for such building height;
- Proposed building western side setback is over 20 metres and affords a well landscaped open area;
- Proposed rear boundary setback building proportions are well-articulated, limited and varied across the large site width with projecting portions of approximately 16 metres wide by 8 metres high with two central ones being setback 6.1 metres and other west and east portions setback 6.8 and 7.2 metres. Generally, reflects typical boundary setback policy of 7 metres for 8 metres height;

SITES ≤ 300m<sup>2</sup> for BUILDING ABOVE 2s (7m)  
SIDE SETBACK 3m + 1/2 OF ADDITIONAL HEIGHT



- Policy for buildings of '3 storeys or more (or heights greater than 7 metres)' also provides for a building envelope of a 30 degree plane, measured from a height of 3 metres above ground level at the zone boundary (rear site boundary in this case). This indicates 8.7 metres for 8 metres height, which has not been provided. A greater setback would be desirable but the limited portions across the overall site width mitigate the overall implications of variation;



- Overshadowing of adjoining sites is generally limited with large setbacks relative to building height. Main impact is limited intrusion to south in mid-winter and east in mid-summer but overall not to an undue degree;
- Overlooking to adjacent residential properties is considered with some upper windows with appropriate orientation but there is a lack of detail of glazing, eg obscure to 1.7 metres, to rear and side elevations for windows which afford direct views to adjacent properties, particularly to south (and south east and south west) and west even at over 20 metres distance.

Views to directly to east are mainly over adjacent flat building small rear courtyards containing trees and otherwise rear communal shared and vehicle access areas;

- Front fence to Victoria Street appropriate contemporary approach to traditional form with large open infill panels but height should be a maximum of 1.8 metres to reflect residential nature of locality and desired character. Fence scales at 2.3 metres from plans which is over-bearing and should be avoided.

Infill panel sections are not detailed, but should provide for well-spaced narrow vertical elements that can readily be seen-through and provide high transparency;

- The site frontage enjoys a substantial row of London Plane street trees that contribute to the streetscape and to screening the development;
- It is noted, that while substantial trees, the London Plane tree is an exempted species from being Regulated and therefore not subject to planning assessment;
- The loss of an existing substantial street tree for the main vehicle access is not supported and should be avoided.

The required movement paths for large service vehicle access and egress to the basement, and benefit of the basement parking and servicing for the function and appearance of the site and overall development, is appreciated.

However, the removal of such a large and significant street tree should be avoidable and the driveway split and/or realigned to be accommodated in gaps between street trees, including possible reasonable pruning.

The removal/relocation of existing stobie poles could be addressed if necessary to facilitate greater space. The 10-metre length of fixed vehicle modelled could potentially be limited to a lesser 8.8 metre length to aid manoeuvrability and clearance.

The realignment may result in the reconfiguration and loss of some on-site visitor spaces, but with adequate overall parking and while reasonable visitor parking is maintained, the substantial continuous row of street trees could remain intact;

- Proposed central drop-off area western crossover appears to provide inadequate clearance and conflict with an existing street tree, which is unwarranted and should be addressed to avoid likely damage/loss of a substantial street tree;
- Vehicle parking, for visitors and particularly staff, is generous and well above (out-dated existing) standards. This presents a favourable technical additional 27 spaces on-site per the standard, but numbers likely closer to actual demand for contemporary residential aged care facility staff levels, shifts and visitors;
- While not required, alternative bicycle and motor cycle parking is provided within the basement, with separate pedestrian and cyclist pathway and access gate;
- Energy efficiency should include provision for passive design, natural light and cross-ventilation. Generous solar collection panels, deep soil, trees, general landscaping and courtyards are positive elements.

Overall, the proposal has several variations from policy parameters. Some are limited variations, individually of varied significance, but which need to be considered in totality. The proposal is a new application to be determined on its own merit and relative to the integrity of the policy, resolved after comprehensive urban design analysis and community debate.

## **Council Issues**

Council specific comment is provided in relation to matters where there are direct implications upon local public infrastructure as follows:

- Encroachments – footpath canopies
- Public realm and street trees
- Vehicle traffic, access, parking and waste servicing
- Stormwater management

### ***Encroachments***

#### **Footpath Canopies**

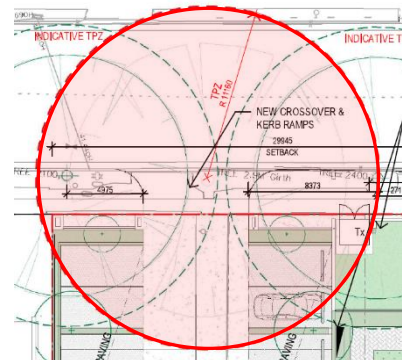
There are no encroachments of the public realm.

### ***Public Realm and Street Trees***

The site frontage enjoys a continuous row of substantial London Plane street trees (an exempt species from being Regulated) that contribute to the streetscape and to the screening of development.

The loss of an existing substantial street tree for the main vehicle access is not supported, with no evident arboricultural reason, or exceptional and compelling factors, warranting its removal.

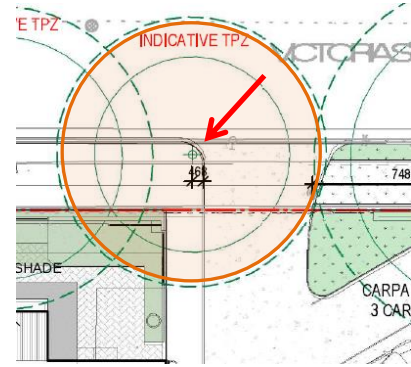
The required movement paths for large service vehicle access and egress to the basement, and the balance with the benefit of the basement parking and servicing for the function and appearance of the site and overall development, is appreciated.



However, the removal of such a large street tree should be avoided and the driveway split and/or realigned to be accommodated in gaps between street trees, with removal/relocation of stobie poles as necessary, and possible lower level reasonable pruning, to facilitate appropriate space between trees. The realignment may result in the loss of some on-site visitor spaces, but with adequate overall and level of visitor parking maintained, the significant continuous row of street trees could remain intact.

Ultimately, the overall development planning consent assessment and determination is by SCAP. If the development is approved, the City of Unley will need to address the request for removal pursuant to the Local Government Act. The determination will need to consider if there are alternatives, or such exceptional and compelling reasons that may necessitate removal, appreciating that approval cannot be unreasonably withheld.

Proposed central drop-off area western crossover appears to provide inadequate clearance and conflict with an existing street tree, which is unwarranted and should be addressed to avoid likely damage/loss of a substantial street tree.



Proposed eastern narrowed crossover (3.4 metres) appears to provide good clearance to existing street tree (1.2 metres) for limited vehicle parking on-site, and service access to east and rear of site. The direct access for service and two car spaces on-site and consequential loss of on-street parking is queried.

Similarly, the western end double on-site space and crossover appear to provide little gain for disruption to on-street parking. There seems no nett gain and likely loss of space and flexibility of overall parking.

Council requirements, standards and costs for infrastructure work and street trees will need to be discussed, including the additional opportunities to collaborate and contribute to an enhanced public realm upgrade.

Any damage, additional planting and reinstatement of footpaths etc will be managed and costs recovered via normal Council procedures from the owner/developer.

### ***Vehicle traffic, access, servicing and parking***

#### Traffic and Access

Vehicle access is from Victoria Street via five proposed crossovers (reconfiguration and relocation of existing five crossovers), including:

- two crossovers to arbours (operating as carports for 2 spaces) which require vehicles to enter in a forward direction and reverse out into the street;
- two crossovers providing one-way access and egress to the circular drop-off/parking area adjacent the main facility entrance (accessing 3 spaces plus a drop-off bay);
- one two-way crossover (approximately 6.0 metres wide) to service main basement carpark, service vehicles and public visitor parking area (accessing 53 spaces – 41 in basement and 12 visitors at grade level).

Victoria Street is a local crossing collector road. It provides access between adjacent residential streets and higher order roads: - Goodwood Road to the east and East Avenue/Leah Street to the west. As such, it carries approximately 3200 vehicles per day. This data was collected in 2019 when the St Basil's Homes facility was not operational. Data from 2017 when the St Basil's Homes facility was operational indicated a traffic volume of 3100 vehicles per day, suggesting that there has been a slight increase in traffic volume in recent years due to factors unrelated to the development site. The traffic volume on Victoria Street exceeds the desirable maximum of 3000 vehicles per day for a local crossing collector road.

The *NSW RTA Guide to Traffic Generating Developments*, indicate that for 'Housing for aged and disabled persons', the daily traffic generation would be 1-2 trips per



unit, or 100-200 additional trips for the 100-bed development. This development would likely generate traffic at the lower end of this range as this facility is likely higher care and less independent than some facilities that would fall under this category (i.e. some facilities where residents may have vehicles).

Given the existing facility contained 84-beds, there is likely a limited traffic increase for the 100-bed facility. The previous estimate of 84 to 168 trips per day would be increased to 100 to 200 trips per day. This represents a limited increase in the context of the overall street volume.

Generally, the car park complies with AS2890.1. Parking space widths and aisles exceed minimum requirements and will result in convenient access to spaces in the basement and at-grade carparks. AS2890.1 indicates that a carpark open to the public that includes a blind aisle (a row of parking with a closed end) greater than six parking space in length, must provide a turnaround area. Therefore, if the basement carpark is to be open to the public this would be required.

Cirqa’s traffic report indicates that “sight line requirements will not be strictly met at the proposed access points”. It is deemed this is appropriate given the urban environment, but no details are provided about which access points in particular are being discussed. The access to the main carparks (53 spaces) should be located to maximise visibility whilst accommodating existing street trees.

The construction of such a large development will be long and complex requiring careful consideration of staging and management of external impacts, notably traffic, parking, pedestrians and environmental emissions. A Construction Management Plan, to the reasonable satisfaction of Council, should be required as part of the approval and before proceeding with the development. Although some unrestricted on-street parking is available within the local area, parking adjacent the site is subject to a 4-hour time limit. Alternative parking options for tradespeople should be considered as part of the Construction Management Plan.

Vehicle Parking

On-site parking should be adequate to meet demand, guided by appropriate standards.

Table Un/5 parking standards for residential development are applicable, and already account for nature of use, proximity to public transport and availability of on-street parking. Expectations for additional discounting are unwarranted.

Land Use	Scale	Rate	Required	Provided
<b>Nursing Home</b>	100 bed	Min 1 / 3 beds	33.3	
<b>Staff – basement</b>				41+
<b>Staff - ground level</b>		west 2 and east 2		4
<b>Visitor – ground level</b>				12
<b>Visitor – drop -off</b>				3+
<b>Total – on-site</b>			33.3	60 (+27)
<b>Total – on-street</b>		(15 existing)		14

+ Including 3 plus 1 disabled spaces (minimum 1 per 25 spaces)

This presents a favourable additional 27 spaces on-site above (out-dated existing) standards, including reasonable dedicated visitor parking. The number is more like actual demand for contemporary residential aged care facility staff levels and shifts.

Adequate disabled spaces are provided, 3 within staff carpark, and 1 in central drop off zone adjacent to main entry for visitors.

On-street parking adjacent the site is reduced from existing 15 to 14 spaces, through revision of existing five crossovers. These spaces should have limited staff use given on-site provisions and remain to primarily serve additional visitor demands.

Consolidation of vehicle crossovers is noted but same number remains. The two new crossovers for direct access off the street to double staff parks, are questioned. The number of spaces provided by the necessary crossovers and the loss of on-street parks seems a no nett gain and flexibility of overall parking. Further the eastern narrowed crossover will compromise ease of access/egress for 2 cars but for staff and regular users may be a feasible option. With adjustment to main visitor carpark these may have more merit for retention for regular visitors, eg doctor, hair dresser etc.

There is currently moderate demand for on-street parking in the area, mainly from local residents, a nearby school, and nearby Goodwood shopping precinct. On-street parking adjacent the site is time managed, 4-hours, 9am to 5pm, Monday to Friday. This is consistent with the general area but with some limited unrestricted parking in other nearby streets. The northern side of Victoria Street is subject to a No Parking Zone, Monday to Friday.

#### Bicycle and Other Parking

No standards are indicated in Table Un/6 for the bicycle parking. However, provision is made for staff bicycle and motor-cycle parking.

Land Use	Scale	Rate	Required	Provided
<b>Nursing Home</b>	33 bed	-	-	
<b>Staff bicycle (basement)</b>		-	-	8
<b>Staff motorcycle (basement)</b>		-	-	4
<b>Visitor bicycle (ground level)</b>		-	-	0
<b>Total</b>			-	+12

There is favourable provision for staff bicycle and motorcycle parking.

No ground level visitor bicycle and motorcycle parking is noted. Areas could be made available to facilitate visitors of such transport options.

The safety for cyclists is considered, with separate dedicated pedestrian and cyclist pathway next to the basement vehicle driveway and separate access door to the vehicle gate to the basement parking area.

### Waste Servicing

A comprehensive Waste Management Plan addresses the capacity, separated streams and servicing for waste generation. The provision for large communal waste bins and waste storage room appears adequate per typical requirements and industry knowledge and experience.

Routine collection is anticipated for 6 individual truck visits per week of the large and multiple bins. Particular peak busy waste generation times or events during the year and adhoc requirements for additional specific pick-ups, eg e-waste and hard waste, will occur on an as needs basis.

Collection times have not been nominated. While the activity occurs on-site within the basement and is largely contained, specific nominated collections would be advisable, to minimise impacts during peak traffic periods and on residential amenity. Standard collection times of 7:00am to 7:00pm Monday to Saturday may be reasonable, or more limited between 9:00 am to 4:00pm Monday to Saturday could avoid peak traffic periods.

Waste management servicing arrangements are appropriate with waste vehicles to enter and exit the site in a forward direction off Victoria Street to the basement area. The impact of driveway alignment and upon street trees is critical and needs to be properly resolved to avoid loss of important and significant street trees.

### ***Stormwater Management***

The maximum runoff flow rate for residential development should be less than pre-existing and the equivalent of 40% impervious (80% pervious) whichever is the lesser in accord with Development Plan (Unley) and City of Unley *Development and Stormwater Management Design Guide*.

The existing development has a high impervious area and the proposed development favourably reduces this.

On-site stormwater management is addressed via a 150KL underground tank, for retention and reuse and detention before overflow, which exceeds the minimum acceptable 50KL calculated for the site. The large open-space and landscaped areas also address on-site WSUD principles and maintains the quality of water outflows.

The land is not identified as normally subject to flood overflow. However, adequate building floor level (higher than existing) and free-board above ground level is provided to avoid potential flood land overflow impacts to building areas.

The outlets to public roads and stormwater infrastructure to address 1:10 year ARI events should be kept below 4 to 5 l/s. These should be distributed equidistant, and as generously separated as possible, along road frontage and watercourse.

Water quality issues are limited. Stormwater is mostly roof run-off, with gross pollutants able to be settled out through tanks. The driveway and paved surfaces could lead to more pollutants, but these can be treated via grated sump traps.

## **Planning Consent Conditions**

In the event approval is contemplated there are various issues that have been identified where planning conditions are warranted, as follows:

- Car parking design and dimensions be reviewed to improve convenient and efficient on-site circulation, space useability and conformity with AS2890 and 99<sup>th</sup>% vehicle turning paths;
- Car parking on-site be allocated per the approved plans for staff and visitors.
- Bicycle parking on-site be provided at the ground level to ensure a level of convenient provision for visitors to the site.
- Any non-residential ancillary land uses not operate outside the hours of 8.00am to 5.00pm Monday to Saturday to limit any neighbouring residential impacts;
- The main two-way accessway be clearly divided or line-marked in the centre to assist vehicles staying in their path and avoiding blocking opposite movement and interrupting on-street movement;
- Front fence be a maximum of 1.8 metres in height above footpath level and contain large areas of highly transparent infill panel sections to the reasonable satisfaction of the Planning Authority;
- Landscaping plan and detail be reconciled with location of specific tree and plant selections being denoted on the site plan to demonstrate the actual effect of the planned planting to the reasonable satisfaction of the Planning Authority;
- Overlooking to adjacent residential properties be addressed by full documentation and detailing of upper level glazing; ie suitable orientation, screening and/or obscure nature to 1.7 metres above floor level; to the rear southern, eastern and western elevations to mitigate direct views to adjacent properties private open-space or windows to the reasonable satisfaction of the Planning Authority;
- Waste and servicing vehicles be a maximum length of 8.8 metres to ensure the most effective turn path geometry and least impacts upon street trees and traffic movement on Victoria Street;
- Waste and service vehicles only visit the site between 10:00am to 4:00pm Monday to Saturday, excluding Sundays and public holidays, to avoid peak traffic periods;
- Retention and clearance of street trees be reviewed to avoid conflict and ongoing damage to the reasonable satisfaction of the City of Unley;
- Public realm configuration, damage, reinstatement and enhancement in relation to footpaths, verge planting and street trees are to be resolved with, and approved by, the City of Unley at the expense of the owner/applicant;
- The on-site flood protection and stormwater management be undertaken in accord with the approved Stormwater Management Plan, and including:
  - stormwater from non-permeable surfaces (eg roofs, courtyards etc) collected on-site for retention, detention and treatment be optimised for on-site reuse for grey water, eg toilets and landscaping irrigation;
  - outlets be limited to 4 litres per second each and distributed equidistant and as generously separated as possible along road frontages and watercourse:

The preceding shall be carried out in consultation with City of Unley to the satisfaction of the State Commission Assessment Panel;

- A Construction Management Plan be resolved with Council and provided with development approval and before commencement of construction to guide the requirements and operations during construction to avoid traffic, parking (including alternative provision), operating hours, noise, pedestrian and amenity issues;
- It is requested a Note be added indicating pursuant to the City of Unley *On-street Parking Exemption* Policy permits are not issued for occupants of new development (post 2013).

### **Conclusion**

The development proposal is of great interest to Unley residents and businesses, particularly those near the site.

The Council is not the assessing authority, and only a referral agency able to make comments and observations. It is therefore appropriate that Council concentrate on the specific areas of direct control while raising its concerns regarding the most significant divergences from the planning policy parameters.

The nature of a large-scale mixed-use development generally accords with the Residential Streetscape (Landscape Zone) and large sites intent, apart from the noted variations. The highlighted areas of concern with planning design and council infrastructure matters should be addressed as part of the expected comprehensive assessment by SCAP.

### **Enquiries**

If there are any queries or need for further explanation or information please contact David Brown, Principal Policy Planner, [dbrown@unley.sa.gov.au](mailto:dbrown@unley.sa.gov.au) or 8372 5185.

Yours sincerely



**Peter Tsokas**  
**CHIEF EXECUTIVE OFFICER**

State Commission Assessment Panel,  
G.P.O. Box 1815,  
ADELAIDE SA 5001

Dear Sir,

I advise that this Agency has **the attached ~~no~~ report** to make on the proposed development described below.

David Brown  
Principal Policy Planner

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Reporting Officer

21 April 2021

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Date

## SPC REFERRAL - COUNCIL



Level 5, 50 Flinders Street  
Adelaide SA 5000

GPO Box 1815  
Adelaide SA 5001

Telephone: 1800 752 664  
Email: [saplanningcommission@sa.gov.au](mailto:saplanningcommission@sa.gov.au)  
ABN 92 366 288 135

Our Ref: 2021/04020/01

10 March 2021

By email: [pobox1@unley.sa.gov.au](mailto:pobox1@unley.sa.gov.au)

**Applicant:** Eldercare Inc.  
**Application Number:** DA 090/E024/21  
**Proposed Development:** Demolition of existing, vacant single-storey nursing home and construction of a two (2) storey, 100-bed nursing home with associated fencing, car-parking and landscaping.  
**Subject Land:** 7-21 Victoria Street, Goodwood.

Dear Sir/Madam

The State Planning Commission (SPC) has recently received a copy of the proposed development application described above (Note: all relevant documentation is attached).

Pursuant to Section 33(1) of the *Development Act 1993* and Regulation 38(2) of the *Development Regulations 2008* a copy of the application is attached for your review and comment.

Council's attention is particularly drawn to the time allowed for comments under Regulation 38(2):

A period of six (6) weeks from the date of lodgement (where Council has received the application) is provided to enable comments to be prepared and forwarded to the SPC. *Note: If the application is a type of development lodged directly with the SPC pursuant to Regulation 15(3), the six-week period for comment starts from when a copy of the application is received by Council from SPC.*

On request, the SPC may grant an extension to the indicated timeframe, however this request should be made in advance of the due date to the relevant planning officer (or to the SPC Secretary on 7109 7060) indicating the reasons for the request and the period of extension sought.

If you have any questions relating to this matter, please contact Nick Kretschmer of this office by telephone on 7109 7631 or email [nicholas.kretschmer@sa.gov.au](mailto:nicholas.kretschmer@sa.gov.au)

When replying please attach a copy of this letter with your details below.

Yours faithfully,

A handwritten signature in black ink, appearing to read "N. Kretschmer".

Nicholas Kretschmer – Planning Officer

For STATE PLANNING COMMISSION

