

# INTRO

4 September 2020

Paul McRostie  
Manager Planning and Compliance  
Planning & Compliance Department  
Naracoorte Lucindale Council

Via email: [council@nlc.sa.gov.au](mailto:council@nlc.sa.gov.au)

Dear Paul,

**RE: New Development Application at 19 Gordon Street Naracoorte**

Intro has been engaged to provide planning advice pertaining to the proposed workers accommodation development located at the decommissioned Tafe SA Naracoorte Campus at 19 Gordon Street Naracoorte.

There are currently two approved development applications which sit over the land and both of which were approved as per the requirements of the Development Act 1993.

The approvals are the subject of two appeals namely:

- DA 674/0147/19 – Merit Appeal

This application was approved for short-term workers accommodation in Buildings 1, 2, 3, 4 and 6 on the land. The application underwent the Category 3 public notification process and having been granted Development Plan Consent merits of the application were appealed by two representors.

- DA 674/053/20 – Procedural Appeal

The application was approved for multiple dwellings in Building 4 and 6 on the land. The description of the buildings as multiple dwellings was appealed by an adjoining land owner. DA 674/053/20 has been enacted and people are living in Buildings 4 and 6.

This application is being made on a without prejudice basis and in no way constitutes an admission that DA 674/053/20 comprises workers accommodation. This application is being made under the *Planning, Development and Infrastructure Act 2016* wherein *workers accommodation* is a defined use

## EXISTING SITE

The subject site (depicted in Figure 1 below) sits within the Neighbourhood Zone as designated by the Planning and Design Code.

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Figure 1: Subject Land

The subject land comprises a total site area of some 16,800m<sup>2</sup> of relatively level land with a frontage to Gordon Street of approximately 140 metres. The built form on site was most recently the Naracoorte Campus for TAFE SA. It comprises a number of local heritage listed buildings from the former Naracoorte High School constructed in 1913. A number of buildings on site form later additions and do not form part of the Local Heritage listing.

The site comprises a spacious landscaped setting with mature native trees and access to at grade car parking spaces from Gordon, Pethick and Foster Streets.

## LOCALITY

The subject locality to Gordon Street includes an aged care facility with rear car parking at 17 Gordon Street that abuts the site to the north along with four group dwellings. The balance of the locality surrounding the site comprises single-storey detached dwellings.

The Naracoorte town centre is located approximately 100 metres to the north of the site.

## PROPOSED DEVELOPMENT

The nature of the proposed development is:

*Change of land use to be staged as follows:*

*Stage 1: Change of use from multiple dwelling to workers accommodation - Buildings 4 and 6*

*Stage 2: Change of use from education to workers accommodation – Building 1*

*Stage 3: Change of use from office to workers accommodation - Building 2*

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The proposed development does not seek any changes to the external fabric of the existing built form.

The proposed occupancy within the subject buildings is as follows:

BUILDING	PROPOSED OCCUPANTS
1	8 AND 1 MANAGER'S RESIDENCE
2	8
4	6
6	9

Occupants will use the existing at-grade car parking facilities.

## PLANNING ASSESSMENT

### PROCEDURAL MATTERS

Workers accommodation does not satisfy the Accepted Development, Deemed-to-satisfy or Restricted development classifications within the Planning and Design Code.

The Performance Assessed pathway designates *All other Code Assessed Development* to this process. The Performance Assessed Pathway requires a development to be assessed against all Zone, General Development, Subzone and Overlay Policies.

Section 107 clause 3(a) of the *Planning, Development and Infrastructure Act 2016* states that notice must be given to:

- (i) *an owner or occupier of each piece of adjacent land; and*
- (ii) *members of the public by notice placed on the relevant land;*

### NEIGHBOURHOOD ZONE

DESIRED OUTCOME	RELEVANCE
DO 1	Yes

**DO 1**      **Housing supports a range of needs and complements the existing local context. Services and community facilities contribute to making a convenient place to live without compromising the residential amenity and character of the neighbourhood**

A local industry which provides significant employment has recently expanded and has a need for migrant workers. Furthermore, there is substantial seasonal work available to people who live a substantial distance from the area. The proposed development, being, for workers accommodation satisfies this need.

The site is located within a short walking distance from the town centre making it well-placed for workers accommodation of this nature which supports the periodic

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working population in Naracoorte township and region. The site enables access to amenities to workers who typically don't have their own means of transport or share transport.

The proposal uses the existing buildings on site which have been part of the Naracoorte building fabric for many years. The proposal does not seek to alter the residential character of the neighbourhood through the introduction of a new buildings or a new building typology, rather it repurposes existing buildings for a complementary use.

The proposed development does not provide for a use which is specifically listed, however, the proposal can contribute to residential amenity by further activating what has historically been an inactive site.

PERFORMANCE OUTCOME	PERFORMANCE FEATURE	RELEVANCE
PO 2.2	DPF 2.2	Yes

**PO 2.2** Development results in sites suitable for their intended purpose.

The proposed development provides for sites which are suitable and have appropriate private open space and access arrangements that are suitable for their intended purpose.

## OVERLAYS

### AFFORDABLE HOUSING

The provisions of this overlay do not apply.

### BUILDING NEAR AIRFIELDS

The provisions of this overlay do not apply.

### LOCAL HERITAGE PLACE

DESIRED OUTCOME	RELEVANCE
DO 1	Yes

**DO 1** Development maintains the heritage and cultural values of Local Heritage Places through conservation, ongoing use and adaptive reuse.

The proposed development comprises the adaptive reuse of a Local Heritage place. The existing local heritage place has been underutilised on the property for some time. Internal reconfiguration of the local heritage place is proposed to facilitate a range of rooms and communal spaces suitable for workers accommodation. These changes will not diminish the buildings' heritage value.

PERFORMANCE OUTCOME	PERFORMANCE FEATURE	RELEVANCE
PO 2.2	-	Yes

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The proposed development provides for the adaptive reuse of a local heritage place to a new use by reconfiguring the internal spaces of the building only. No external changes to the building are proposed.

## NATIVE VEGETATION

The provisions of this overlay do not apply.

## PRESCRIBED WELLS AREA

The provisions of this overlay do not apply.

## WATER PROTECTION AREA

The provisions of this overlay do not apply.

## GENERAL DEVELOPMENT POLICIES

### DESIGN IN URBAN AREAS

PERFORMANCE OUTCOME	PERFORMANCE FEATURE	RELEVANCE
PO 3.1	-	Yes

The subject land currently contains a substantial amount of landscaping. The proposed development will enhance the existing landscaping on site and will ensure it creates amenity for the occupants and the locality.

A portion of landscaping has been undertaken as part of a separate consent.

### INTERFACE BETWEEN LAND USES

DESIRED OUTCOME	RELEVANCE
DO 1	Yes

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

The proposed development is for a change of land use for existing buildings. The proposed land use provides for longer term residents to live on the site and is more akin to residential development than other uses.

PERFORMANCE OUTCOME	PERFORMANCE FEATURE	RELEVANCE
PO 1.1	-	Yes
PO 1.2	-	Yes
PO 2.1	N/A	Yes

**PO 1.1** Sensitive receivers are designed and sited to protect residents and occupants from adverse impacts generated by lawfully existing land uses and land uses desired in the zone.

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

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The occupants are moving into existing buildings with established setbacks to lawfully existing land uses, identified as sensitive receivers. The proposed development is also considered to have sensitive receivers as it contains people living in accommodation on the land. As both land uses are sensitive receivers they can be reasonably expected to there is the potential for them to coexist.

**PO 2.1** Non-residential development does not unreasonably impact the amenity of sensitive receivers or an adjacent zone primarily for sensitive receivers through its hours of operation having regard to:

- a) the nature of the development
- b) measures to mitigate off-site impacts
- c) the extent to which the development is desired in the zone
- d) measures that might be taken in an adjacent zone primarily for sensitive receivers that mitigate adverse impacts without unreasonably compromising the intended use of that land.

The proposed development comprises a residential land use, which does not comprise residential development. Workers accommodation has people living on the land who are sensitive receivers on the land. The inhabitants of the proposed accommodation use on the land will be required to use the land in a manner which is residential in nature.

## TRANSPORT, ACCESS, AND PARKING

PERFORMANCE OUTCOME	PERFORMANCE FEATURE	RELEVANCE
PO 5.1	DPF 5.1	Yes

**DPF 5.1** Development provides a number of car parking spaces on-site at a rate no less than the amount calculated using Transport, Access and Parking Table 1 - General Off-Street Car Parking Requirements or Transport, Access and Parking Table 2 - Off-Street Vehicle Parking Requirements in Designated Areas, whichever is relevant.

The proposed development provides for Workers Accommodation which requires car parking designated at a rate of 0.5 spaces per bed plus 0.25 spaces per bed for visitor parking.

The proposal therefore has a requirement to provide 16 car parking spaces for the inhabitants of the accommodation, and a further 8 spaces for visitors. There is substantial car parking on the subject land which can accommodate the anticipated demand.

A car parking and traffic assessment is currently being prepared and will be provided to you as soon as possible.

## WORKERS ACCOMMODATION AND SETTLEMENTS

DESIRED OUTCOME	RELEVANCE
DO 1	Yes

**DO 1** Appropriately designed and located accommodation for seasonal and short-term workers in rural areas that minimises environmental and social impacts.

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The proposed development provides for appropriately design workers accommodation through the adaptive reuse of existing buildings. The facilities provided and available to each resident are of a high quality with good access to natural light and ventilation.

The location of the workers accommodation has been appropriately sited with close proximity to local services. Environmental and social impacts will be managed through the House Rules document.

A manager's residence is proposed as part of Building 1. The manager will reside on the land and ensure that the occupants of the workers accommodation are satisfying the House Rules.

**PO 1.1**                      **Workers' accommodation and settlements sited and designed to minimise impacts on views from scenic routes, tourist destinations and areas of conservation significance.**

The proposed workers accommodation is located in existing buildings and will not impact on:

- scenic routes;
- tourist destinations; and
- Areas of conservation significance.

**PO 1.2**                      **Workers' accommodation and settlements are sited and designed to minimise nuisance impacts on the amenity of adjacent users of land.**

The location of the workers accommodation has been appropriately sited with close proximity to local services. Environmental and social impacts will be managed through an onsite manager who will enforce the House Rules.

**PO 1.3**                      **Workers' accommodation and settlements are built with materials and colours that blend with the landscape.**

The proposed workers accommodation is located in existing buildings within a township and will not have an impact on the landscape.

**PO 1.4**                      **Workers' accommodation and settlements are supplied with service infrastructure such as power, water and effluent disposal sufficient to satisfy the living requirements of workers.**

The proposed workers accommodation facility is serviced by appropriate infrastructure.

## CONCLUSIONS

The proposed development is an appropriate development as it provides for:

- the adaptive reuse of existing buildings on the land;
- an appropriate use on the land;
- an appropriate amount of car parking;

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- a House Rules document which protects the existing residents of the locality during noise sensitive hours; and
- an onsite manager to enforce the House Rules.

For the reasons listed herein, I am of the opinion that the proposed development warrants planning consent.

Should you wish to discuss any matter further, please contact the undersigned on 8410 0453 or 0406 424 403.

Yours sincerely



**ANTHONY GATTI**  
**Senior Planning Advisor**

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## **ATTACHMENTS**

ARCHITECTURAL PLANS  
HOUSE RULES