



19th February 2020

The Chairman
South Australian Planning Commission
C/- Department of Planning, Transport & Infrastructure
Level 5
50 Flinders Street
Adelaide SA 5000

By email: DPTI.PlanningReformSubmissions@sa.gov.au.

Dear Sir,

Draft Planning and Design Code - Royal Adelaide Golf Club Inc

Thank you for providing the opportunity to comment to on the draft Urban Areas Planning and Design Code (**the Code**).

Royal Adelaide Golf Club Inc (**the Club**) has been in existence for some years and has been situated at its current location on Tapleys Hill Road, Seaton, for over 115 years.

The Club's current location comprises a parcel of land in the order of 68 hectares which is generally bounded by Tapleys Hill Road, Trimmer Parade, Meakin Terrace and Frederick Road, Seaton.

Improvements on the Club's land include a World Top 100 ranked golf course, a clubhouse, Works Depot and other associated infrastructure.

The Club's land is presently, according to the Charles Sturt Council's Development Plan, zoned Special Use.

The draft Code proposes to rezone the Club's land to "Open Space Zone".

The Special Use Zone policies are, in the view of the Club, appropriate in that they, in effect, recognise the long-standing existing use of that land by the Club, and also make adequate provision for any future development of the Club for purposes associated with the continuation of that existing use.

THE ROYAL ADELAIDE GOLF CLUB INC.

By contrast, the Open Space Zone policies in the draft Code are not as well suited to the Club's existing and future needs.

The Club's concerns with respect to the Code are as follows:

1. The Club considers that there is a very good case to be made out for either designating the various activities of the Club (e.g., golf course, clubhouse, works depot and other such infrastructure) as "Accepted" development or "Deemed-to-Satisfy" development. In this regard, it is instructive to note that in the Special Uses Zone a "golf course" is designated as a "complying" kind of development.
2. If, for whatever reason, the view is taken that the activities of the Club should not be designated as "accepted" or "deemed-to-satisfy" development then at the very least those activities should be specifically listed in Table 3 - Applicable Policies for Performance Assessed Development of the draft Code, i.e., as opposed to being (as they are at the moment) undesignated and thus "lumped" into the category: "All other Code assessed development."
3. Desired Outcome 1 (DO1) of the Open Space Zone does not suitably reflect the long-standing use of the Club (namely, a golf course with associated activities). Whilst the Club's land (developed as it is as a golf course) has a natural character that, incidentally, provides visual relief to the built environment that is enjoyed by the community, DO1 ignores the essential purpose of the Club namely, the playing of golf on a golf course, and associated activities.

The Club considers that DO1 should be modified so that it recognises, and promotes, the continued use of the Club's land for golf club purposes (with the continued secondary benefits that arise from that golf club use, namely, the provision of visual relief to the built environment enjoyment of the community). The Club consider the sole objective of the existing Special Uses zone better reflects the existing (and future) use of the Club's land, namely a "*... zone accommodating special public and private activities of an institution or open character*".

4. The Club has concerns regarding the meaning and intent of Performance Outcome 1.1 of the Open Space Zone (PO1).

PO1 seeks development that "*... is associated with or ancillary to the provision of unstructured outdoor passive and active recreation facilities.*"

The Club's concern with PO1 relates to the use of the word "unstructured". What is meant by "unstructured" and is that word applicable to "outdoor passive recreation facilities" **and** "active recreation facilities."

The Club's activities (i.e., the use of the golf course etc) are not what the Club would consider to be: unstructured". This matter, the Club considers, needs to be clarified to avoid confusion and uncertainty in the future.

5. The Club has concerns with DTS/DPF 1.1 of the Open Space Zone. That provision lists land uses that are, in effect, "envisaged" in the Open Space zone. The envisaged uses are:

- 5.1. open space;
- 5.2. outdoor sports courts;
- 5.3. recreation area; and
- 5.4. sporting ovals and fields.

What is meant by "open space"? A golf course is typically open in nature but such a facility has as its core purpose, the playing of golf. A golf course is not to be likened to a park or a recreation area. Such land uses have as their core purpose public access open space.

Nor is a golf course a "recreation area". "Recreation area" is a term defined in Part 7 (Land Use Definitions) of the draft Code and it can be seen from a reading of that definition that a privately owned golf course does not constitute a "recreation area".

What is meant by "sporting fields"? Does that include the golf course? The fact that this question needs to be asked at all suggests to the Club that clarification is necessary.

The Club believes that a "golf course" and "clubhouse and associated facilities" should be specifically listed in the list of envisaged uses to avoid any doubt. As noted above, in the Special Uses Zone of the current Development Plan a golf course is specifically listed as a "complying" kind of development.

6. The Club considers that development undertaken on the Club's land for golf course related activities should be a non-notifiable kind of development. It recommends therefore that the Procedural Matters section of the Open Space Zone should be amended to make it clear that such development is **not** a notifiable development. If this particular submission is not accepted then the Club contends that development for golf course related activities on the Club's land should only be a notifiable development where the specific site of that development is within 30m of land that is in a different zone.

We ask that these submissions be carefully considered by the Commission and we thank you once again for the opportunity to make these submissions

Finally, we would be grateful if you could acknowledge receipt of this submission in due course.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Gay', written in a cursive style.

Andrew Gay
General Manager
Royal Adelaide Golf Club Inc