

**APPLICATION ON NOTIFICATION – CROWN DEVELOPMENT**

| | |
|---|---|
| Type of development: | Section 131 – Crown Development |
| Development Number: | 26011637 |
| Applicant: | Willunga Basin Water Company Pty Ltd |
| Nature of Development: | Staged construction and operation of two water storage facilities (1.301 Gigalitres) |
| Subject Land: | 260 Whitings Road, Blewitt Springs; being Allotment 3, Filed Plan 153389; Certificate of Title Volume 5667 Folio 407. |
| P&D Code Version: | Version 2026.9 dated 14 May 2026 |
| Zone / Sub Zone: | Hills Face Zone |
| Contact Officer: | Simon Neldner |
| Phone Number: | 08 7133 2376 |
| Consultation Start Date: | 11 JUNE 2026 |
| Consultation Close Date: | 9 JULY 2026 |
| <p>During the notification period, the application documentation can be viewed on the SA Planning Portal: https://plan.sa.gov.au/en/state_developments.</p> | |

Written representations must be received by the close date (indicated above) and can either be made online (via the electronic submission form on the Plan SA website) posted, hand-delivered, or emailed to the State Commission Assessment Panel (SCAP).

Any representations received after the close date will not be considered.

Postal Address:

Senior Governance Officer
State Commission Assessment Panel
GPO Box 1815
ADELAIDE SA 5001

Street Address:

Planning and Land Use Services
Level 9, 83 Pirie Street
ADELAIDE SA 5001

**Please call 1800 752 664 (Plan SA Help desk) beforehand to confirm access and visitation arrangements.

Email Address: spcreps@sa.gov.au



PLANNING, DEVELOPMENT AND INFRASTRUCTURE ACT 2016

SECTION 131 – CROWN DEVELOPMENT

NOTICE OF APPLICATION FOR APPROVAL TO DEVELOPMENT

Notice is hereby given that an application has been made by **Willunga Basin Water Company Pty Ltd** (being specifically endorsed for the purposes of essential infrastructure by the Department for Infrastructure and Transport under section 131 of the *Planning, Development and Infrastructure Act 2016*) for approval to undertake the staged construction and operation of two water storage facilities (1.301 Gigalitres).
Development Number: 26011637

The project will also involve earthworks, construction of a pump shed, fencing, rainwater tank, access tracks and ancillary infrastructure, together with native vegetation clearance. The development timeframe is up to 10 years for Stage 2 (second storage) to be completed.

The subject land is located at 260 Whittings Road, Blewitt Springs; being Allotment 3, Filed Plan 153389: Certificate of Title Volume 5667 Folio 407.

The development site is located within the Hills Face Zone of the Planning and Design Code (Version 2026.9 dated 14 May 2026).

A copy of the development application is available for download from the PlanSA website at https://plan.sa.gov.au/en/state_developments and can also be viewed in person at Planning and Building, Department for Housing and Urban Development, Level 9, 83 Pirie Street, Adelaide. Please call 1800 752 664 (PlanSA Help desk) beforehand to confirm access and visitation arrangements.

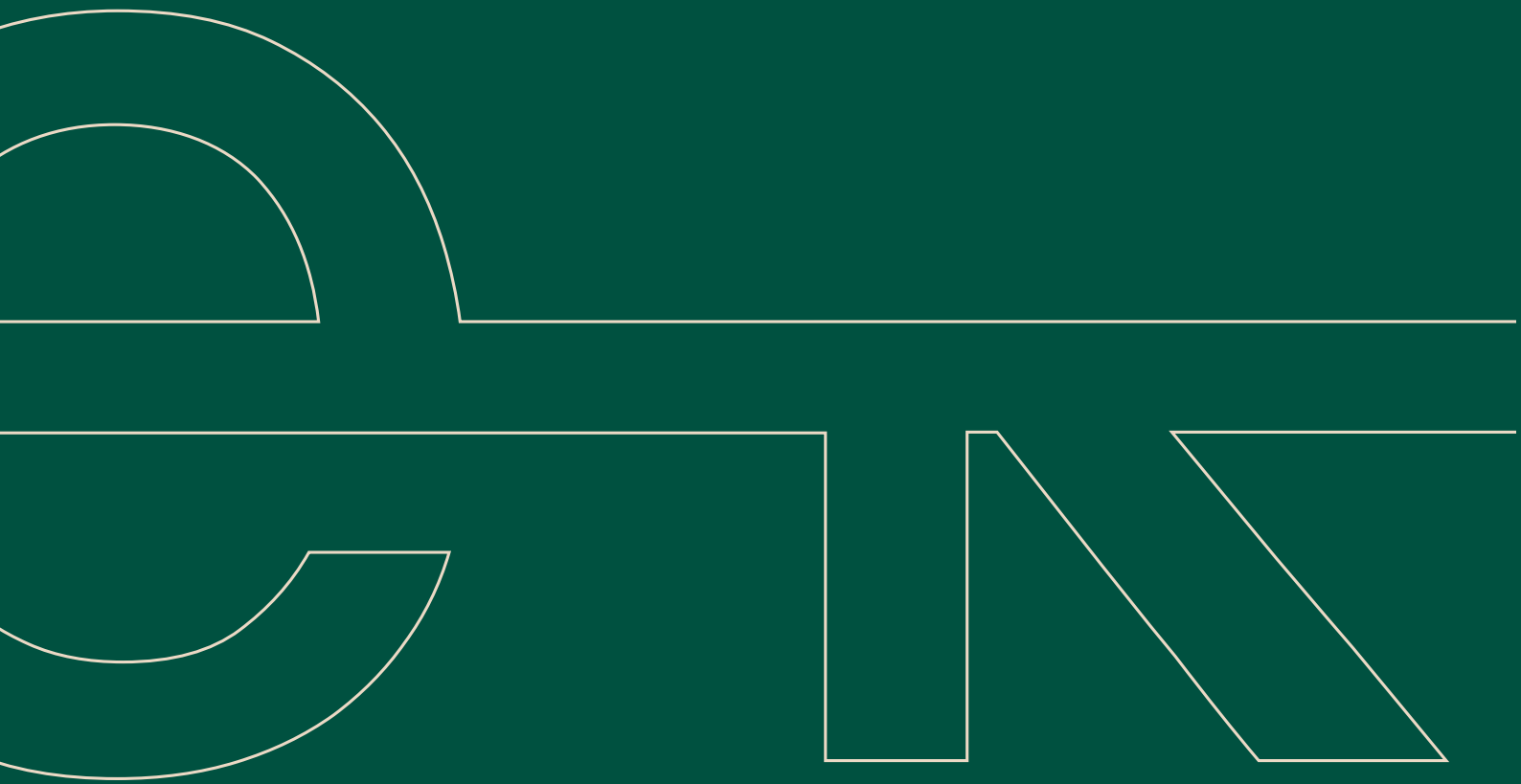
Any person or body who desires to do so may make representations concerning the application by notice in writing, either by using the online submission form on the PlanSA website, via post to the Senior Governance Officer, State Commission Assessment Panel, GPO Box 1815, Adelaide SA 5001, or via email to screps@sa.gov.au

All written submissions must be received **NOT LATER THAN 9 July 2026**.

Each person or body making a representation should state the reason for the representation and whether that person or body wishes to be given the opportunity to appear before the SCAP to further explain the representation. Submissions may be included in SCAP agenda documents.

Should you wish to discuss the application, and the public notification procedure please contact Simon Neldner on (08) 7133 2376 or simon.neldner@sa.gov.au

STATE COMMISSION ASSESSMENT PANEL
screps@sa.gov.au



WBWC Recycled Water Storage Facilities

260 Whitings Road, Blewitt Springs

Planning Statement

25 March 2026

REF# 01989



ACKNOWLEDGEMENT TO COUNTRY

Ekistics respectfully acknowledges the traditional owners and custodians of the land on which we work and we pay our respects to Elders past and present.



PROPRIETARY INFORMATION STATEMENT

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| Revision | Description | Author | Date |
|-----------|----------------------------------|--------|------------|
| Version 0 | Planning Statement (Draft) | RG | 01/03/2026 |
| Version 1 | Planning Statement (Peer Review) | RH | 02/03/2026 |
| Version 2 | Updates to Planning Statement | RG | 14/04/2026 |

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11.STORMWATER MANAGEMENT PLAN & REPORT

1. EXECUTIVE SUMMARY

| Category | Details |
|--|--|
| PROJECT | Willunga Basin Water Company Water Storage Project |
| ADDRESS OF SITE | 260 Whittings Road, Blewitt Springs |
| FIRST NATIONS COUNTRY | Kaurna |
| CERTIFICATES OF TITLE | Lot 3 in Certificate of Title Volume 5667 Folio 407 |
| ALLOTMENT AREA | Approximately 35 hectares |
| LOCAL GOVERNMENT | City of Onkaparinga |
| RELEVANT AUTHORITY | Minister for Planning pursuant to Section 131 of the <i>Planning, Development and Infrastructure Act 2016</i> |
| PLANNING AND DESIGN CODE | Version 2026.6 (Published on 26 March 2026) |
| ZONE | Hills Face |
| OVERLAYS | <ul style="list-style-type: none"> • Character Preservation District • Heritage Adjacency • Native Vegetation • Prescribed Wells Area • Water Resources • Hazards (Bushfire – High Risk) • Prescribed Water Resources Area • Regulated & Significant Tree • State Significant Native Vegetation |
| TECHNICAL & NUMERIC VARIATIONS (TNVs) | N/A |
| EXISTING USE | Residential and primary production (viticulture) |
| PROPOSAL DESCRIPTION | Essential Water Infrastructure development comprising two (2) recycled water storage facilities with a combined capacity of 1.301 gigalitres, prescribed earthworks, a 18m x 12m x 4 metre high pumping shed and attached to a 22,000 litre rainwater tank, together with associated chainmesh fencing, native vegetation clearance and access tracks, to be delivered in two (2) stages, and substantially commenced within 2 years and substantially completed over an extended period of 10 years. |
| PUBLIC NOTIFICATION | Subject to public notification – Value exceeds \$10M |
| REFERRALS | <ul style="list-style-type: none"> • City of Onkaparinga for comment • Native Vegetation Council - Level 3 clearance of native vegetation • Department of Environment & Water – Where the relevant authority determines that the development involves the erection, construction, modification, enlargement or removal of a dam, wall or other structure that will collect or divert, or collects or diverts surface water flowing over land |
| APPLICANT | Willunga Basin Water Company Pty Ltd (WBWC) |
| CONTACT PERSON | Robert Gagetti - Senior Associate |
| OUR REFERENCE | 01989 |

2. INTRODUCTION

This Planning Statement has been prepared in a support of Crown-sponsored development application submitted by the Willunga Basin Water Company Pty Ltd (WBWC) for essential water infrastructure in the form of recycled water storage facilities over land located at 260 Whitings Road, Blewitt Springs.

This Planning Statement provides information about the site, locality and proposed development, and addresses the merits of the proposal with reference to the relevant provisions set out within the Planning and Design Code.

The purpose of this Planning Statement is to assist the Department for Housing & Urban Development, the State Commission Assessment Panel and the Minister for Planning in assessing the proposal, in accordance with the assessment process set out within Section 131 of the *Planning Development and Infrastructure Act 2016*.

For the purposes of this Planning Statement, the *Planning, Development and Infrastructure Act 2016* will be referred to as the 'PDI Act', the *Planning, Development and Infrastructure (General) Regulations 2017* will be referred to as the 'PDI Regulations' and the Planning and Design Code will be referred to as the 'Code'.

Attached to this Planning Statement are the following supporting plans and documentation:

| | | |
|--------------------|---|--------------------|
| Appendix 1 | Certificate of Title and Deposited Plan | |
| Appendix 2 | DIT Sponsorship letter | |
| Appendix 3 | Site contour plan | |
| Appendix 4 | Design Plans | Pinion |
| Appendix 5 | Operational Management Plan (Draft) | coNEXA |
| Appendix 6 | Midge Management Plan (Example) | coNEXA |
| Appendix 7 | Visual Impact Assessment & Landscape Design | Wax Design |
| Appendix 8 | Native Vegetation Data Report | Jeremy Ross Carter |
| Appendix 9 | Odour Assessment | Vipac |
| Appendix 10 | Acoustic Report | Echo |
| Appendix 11 | Stormwater Management Report | Tonkin |

3. BACKGROUND

Recycled water is becoming increasingly important in McLaren Vale due to declining groundwater availability and quality. Recycled water now supplies approximate 50% of the region's irrigation needs and offers a reliable, climate-independent alternative to other more conventional water sources.

The Willunga Basin Water (WBW) Recycling Scheme (fully owned by WBWC) sources treated (recycled) water from three plants, including the Christies Beach Waste Water Treatment Plan (CBWWTP), the Aldinga Waste Water Treatment Plan (AWWTP) owned by SA Water, together with the Willunga Waste Water Treatment Plan (WWWTP) owned by the City of Onkaparinga. WBWC has a 30-year contract with SA Water for first rights to purchase most of the recycled water from the CBWWTP, as well as a smaller volume from the AWWTP.

The Scheme's success is underpinned by strong collaboration between WBWC, SA Water, the City of Onkaparinga, and local irrigators (represented by the McLaren Vale Community Sustainability Company). This partnership has expanded access to recycled water, supporting regional sustainability, and reduced environmental impacts resulting from wastewater discharge to Gulf St Vincent.

Groundwater extraction (the traditional source of irrigation water in the region) is becoming increasingly scarce and saline, making it less suitable for irrigating vines and other crops. At the same time, climate change is driving a greater demand for water, particularly during the hotter, drier summer months when crops require more irrigation to maintain productivity. Opportunities for further growth and expansion of irrigated agriculture, together with population growth in the southern regions of Greater Adelaide are expected to place further strains on existing water resources.

Consequently, recycled water is becoming an increasingly important and reliable alternative for irrigators. However, in the McLaren Vale region, the use of recycled water is currently constrained by limited seasonal storage capacity. In 2020, WBWC made available 750ML of recycled water from its existing Seaford Heights recycled water storage facility. However, with demand for recycled water exceeding expectations, all water has been allocated.

The McLaren Vale Recycled Water Demand Assessment prepared by Jacobs¹ suggests that reported water usage within the McLaren Vale region is between 8,500 and 13,000 ML/year. Further, the Jacobs report forecasts an additional short term (0-5 year) demand for a further 920 ML per annum (particularly during peak summer irrigation season) with an estimated regional capacity (modelled across multiple usage scenarios) for additional volumes of recycled water up to and exceeding 1.3GL.

Looming supply shortages of fit-for-purpose water for irrigation forms the catalyst for the proposed development, which aims to deliver an additional 1.3GL of water to the McLaren Vale region. Treated water will be collected from the Christies Beach WWTP and conveyed via underground water infrastructure (owned and managed by WBWC) to the Water Storage Facilities to be established in Blewitt Springs.

¹ Jacobs, 2024, McLaren Vale Recycled Water Demand Assessment (Parts A, B & C), Jacobs Group Australia, Adelaide

3.1. The National Water Grid Fund Program

Working in collaboration with the Department for Environment & Water (DEW), WBWC has submitted a business case in support of an application for a federal government grant via the National Water Grid Fund (NWGF) Program, which if successful, will fund construction of the development.

The NWGF is an Australian Government infrastructure investment program designed to improve water access and security across the country. Its primary purpose is to support nationally significant water infrastructure projects that:

- provide safe and reliable water for regional and remote communities;
- generate public benefit through responsible investment in water infrastructure for productive uses, such as agriculture; and
- build resilient water infrastructure that is environmentally sustainable and culturally responsive.

3.2. Crown sponsorship

At the request of the WBWC, the Chief Executive of Department for Infrastructure and Transport has confirmed support and endorsement of the proposed development as a form of 'essential infrastructure' under Section 131(2)(c) of the PDI Act. A copy of this endorsement is attached as **Appendix 2**.

4. SITE & LOCALITY CONTEXT

4.1. Subject Site

Illustrated in **Figure 4-1**, the subject site is located at 260 Whitings Road, Blewitt Springs, and is formally identified as Lot 3 in Certificate of Title Volume 5667 Folio 407 (**Appendix 1**).

The Title confirms that the site does not accommodate any easements or any other caveats, Land Management Agreements (LMA's), encumbrances etc. which may otherwise prevent or constrain future use of the site for the storage of recycled water.

The site comprises an area of approximately 86 acres (approx. 35 hectares) with a frontage to Whitings Road to the north-west. The site is primarily used for primary production (viticulture) and also accommodates a detached dwelling together with associated outbuildings. The dwelling and all associated outbuildings are not protected as either local or state heritage places.

Situated on the land, adjacent the site's north-western boundary and Whitings Road is a stobie pole with connection to overhead powerlines traversing Whiting Road. Similarly, overhead powerlines also traverse the south-western corner of the subject site and connect with an existing overhead powerline, also traversing Whitings Road. Also occupying the south-eastern corner of the site is a dense cluster of mature native vegetation which covers approximately 9.7 hectares of the overall site.

The existing dwelling is located at the highest point of the site, positioned along a ridge, with the land then sloping away to the south, east and south east. The contours of the land are such that it is characterised by an undulating valley, traversing the centre of the site.

The site contains an overall approximate elevation change of 26 metres, descending from RL 164 (approx.) which is also the benched level for the dwelling, down to approximately RL 137 at the southern boundary.



Site and Surrounds

260 Whitings Road, Blewitt Springs

4.2. Locality

The locality is characterised by large rural and rural-residential allotments which are predominantly used for agricultural and horticultural purposes (in particular vineyards). Development within the locality is largely confined to a limited number of detached dwellings together with associated outbuildings and farm buildings to support onsite horticultural and agricultural uses. The immediate and broader locality accommodates a number of short-term accommodation uses, the closest of these being the ‘The Vineyard McLaren Vale’ situated to the south-west of the site at 165 Whiting Roads. This use includes guest houses with easterly views towards the site.

To the north-west of the site (on the opposite side of Whittings Road) is the Onkaparinga River National Park which encompasses various walking trails and is characterised by dense scrubland. This adjacent National Park is situated within the State Significant Native Vegetation Overlay of the Planning and Design Code (the ‘Code’), which also encompasses vegetation which lines the site’s frontage to Whittings Road.

Situated to the west of the site at 207 Whittings Road, Blewitt Springs are several Local Heritage Places described on the SA Heritage Places Database as “Former ‘Tintara Winery’ Ruins – remnants of wall, foundations & tanks”. The approximate area of heritage listed buildings relative to the subject site is displayed in **Figure 4-1** below:

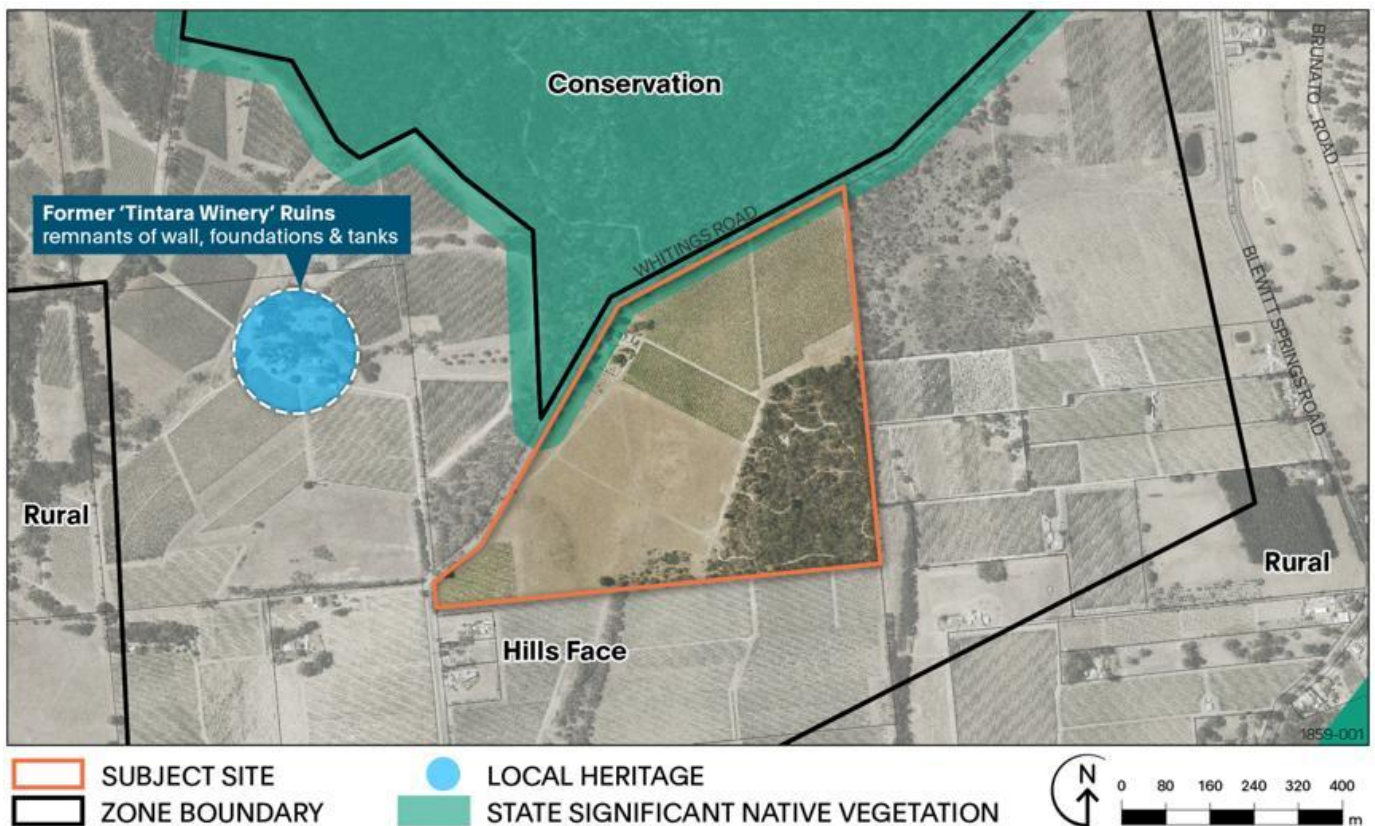


Figure 4-1: Site relative to Local Heritage Place

5. PROPOSED DEVELOPMENT

The development is depicted in the plan provided in **Appendix 4** and includes the following key features:

- **Water Storage Facilities:** Two ‘*Turkey Nest*’ water storage facilities with a combined storage capacity of 1.301 gigalitres (GL) including a southern storage facility (660ML) and a northern storage (641ML). The southern storage facility will comprise approximate dimensions of 420 metres in length 350 metres in width, and a depth of approximately 12.3 metres. The northern water storage facility will comprise approximate dimensions of 470 metres in length, 260 metres in width and a depth of approximately 15.3 metres.
- **Prescribed Earthworks:** The ‘*Turkey Nest*’ form is characterised by elevated embankments (fill) around each water storage facility, and centralised depressions (excavation) to achieve the desired water capacity requirements. Elevated embankments enclosing each water storage facility will be battered at 1 in 3 down to natural ground level. Embankments will be elevated to the following approximate maximum heights:
 - » Northern water storage facility: 15 metres to the south east, and 4.75 metres adjacent Whitings Road to the north.
 - » Southern water storage facility: 15.9 metres to the and 2.6 metres adjacent Whitings Road to north.
- **Construction Methodology:** Each water storage facility will be designed and constructed in accordance with the Australian National Committee on Large Dams (ANCOLD) guidelines, which includes a lined impermeable surface and clay lined sub-surface, equipped with a leak detection network.
- **Distribution Pump Station Shed & Rainwater Tank:** The construction of a 18m x 12m x 4m high (maximum) shed, accommodating five (5) x 75KW pumps, to be used for the distribution of water to customers throughout the McLaren Vale region. The shed will be constructed in Colorbond® green and designed and constructed in accordance with the acoustic recommendations provided by Echo.
- **Vegetation Clearance:** The clearance of native vegetation, including (3) *Acacia Pycnantha*’s (Golden Wattles) situated to the south of the southern water storage facility; 1.48 hectares scattered native flora, predominantly in the form of *Pteridium esculentum* ssp. *Esculentum* (Bracken Fern); and 0.012 hectares of woodland understorey to *Eucalyptus fasciculosa* (Pink Gum) to accommodate the vehicle access track.
- **Access:** Access via a single informal crossover connecting with Whitings Road and internal access tracks positioned at the base and ridge of each water storage facility and surfaced in 150mm quarry rubble with circa 20mm granules. Existing access roads to the south and south-east of the water storage facilities will be reused wherever possible.
- **Security Fencing:** 1.8m high chain mesh perimeter security fencing installed around the perimeter of the ‘development site with screening plants introduced to reduce or minimise any external visual impact of the structure from the adjoining road network and adjacent properties.
- **Associated Infrastructure:** Associated infrastructure, including an overflow pipe, inlet / outlet pipe and isolation valve, connecting to an upgraded underground pipe network traversing Whitings Road and Kays Road, before connecting to the existing underground private water network.

5.1. Land Use

The definition of ‘*Essential Infrastructure*’ includes “*water infrastructure or sewerage infrastructure within the meaning of the Water Industry Act 2012*”

[underlined for emphasis]

The *Water Industry Act 2012* defines ‘*water infrastructure*’ as follows:

water infrastructure means—

(a) *any infrastructure that is, or is to be, used for—*

(i) *the collection or storage of water, including a dam or reservoir, a water production plant or a wetland; or*

(ii) *the treatment of water; or*

(iii) *the conveyance or reticulation of water and includes the connection point; or*

(b) *any other infrastructure used in connection with water and brought within the ambit of this definition by the regulations,*

but does not include—

(c) *any pipe, fitting or apparatus that is situated downstream of a customer’s connection point; or*

(d) *any pipe, fitting or apparatus that is situated upstream of a customer’s connection point to a stormwater drain; or*

(e) *infrastructure situated entirely within one site and not connected to any other infrastructure situated within another*

(f) *any other infrastructure used in connection with water that is excluded from the ambit of this definition by the regulations;*

[underlined for emphasis]

The water storage facilities are a form of ‘*Essential Water Infrastructure*’, to be used for irrigation purposes, to support horticultural activities (predominantly viticulture) within the Willunga Basin region.

Recycled/treated water will be transferred from the CBWWTP to WBWC’s existing Quarry Road water storage facility, before being pumped to the water storage facilities with a total combined storage capacity of 1.3ML.

The fundamental intent of the project is to maximise WBWC’s water storage capacity, particularly during high rainfall periods, for reuse during summer months when water demand within the region surpasses supply.

5.2. Design & Construction Methodology Overview

The 90% design drawings by Pinion (**Appendix 4**) are designed to address the best practice Australian National Committee of Large Dams (ANCOLD) standards.

Key design features of each water storage facility include:

- Prescribed bulk earthworks, as required to achieve a ‘Turkeys Nest’ dam profile, characterised by homogenous embankments elevated above natural ground level.

- Each storage facility will be grounded on a 300mm clay-lined basin floor;
- A High-Density Polyethylene (HDPE) liner on a geotextile fabric will be placed on the clay-lined floor and used as an effective and recognised means of containing liquids, preventing leaks and protecting soil and groundwater from contamination;
- The facility will be equipped with an emergency release pipework and leak detection network.

Prescribed earthworks across the site are predominantly due to the Turkey Nest formation of each water storage facility. Unlike conventional dams, a Turkey Nest design is characterised by a centralised basin/depression, surrounded by raised embankments. **Figure 5-1** provides an image of the WBWC’s Seaford Heights water storage facility, which also adopts the Turkey Nest design as demonstrated by the raised outer embankment.

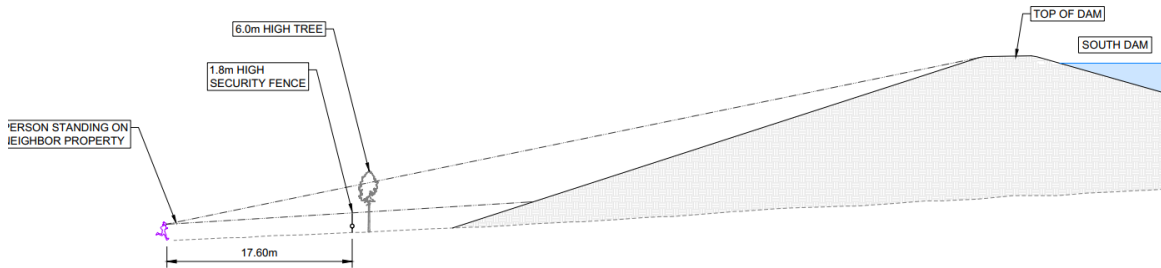


Figure 5-1 – Bakewell Rd. Seaford Heights Water Storage Facility

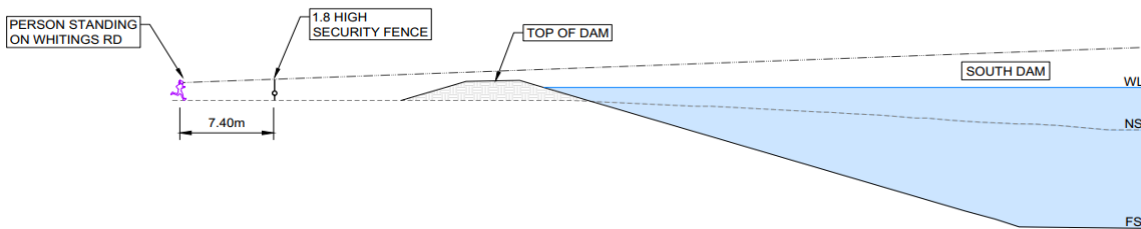
The height of the perimeter embankment is largely informed by capacity requirements and the natural terrain of the land.

The subject site is characterised by undulating falls to the south and east. Accordingly, perimeter embankments are at their greatest in these locations (Image 1 in **Figure 6-1**). Conversely, the site’s high point to Whittings Road results in nominal embankment heights as reflected in Image 2 and 3 in **Figure 6-1**. A full set of Section Drawings is provided in Dwg. No. 231 & 232 of **Appendix 4**.

Image 1 - View of southern water storage looking north from 170 Whitings Rd



View of southern water storage facility from Whitings Rd to the north



View of northern water storage facility from Whitings Rd to the north

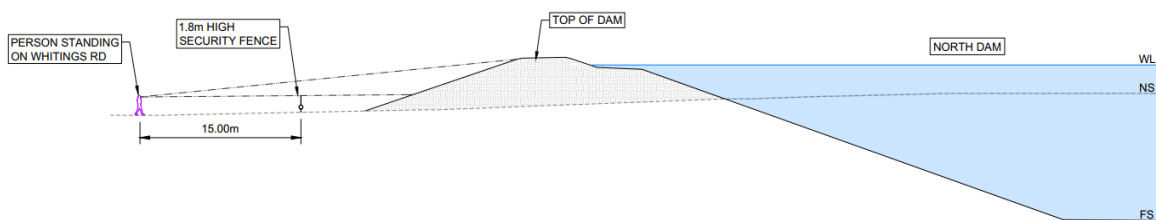


Figure 5-2 - Cross Section Drawings – Water Storage Facilities

Visual impacts identified by WAX Design will be managed by existing mature vegetation and supplementary vegetation across the site and on embankments to obscure key vistas and reduce the notability and visual impact of each water storage facility. The visual impact analysis and landscape design is attached as **Appendix 7**.

5.3. Operational Summary

Key operational aspects of the proposed development are addressed in the draft Operational Management Plan provided in **Appendix 5**.

5.3.1. Storage and Distribution

Each water storage facility will operate as a key pressure node within the WBW irrigation network. Their primary purpose is to store treated water delivered from the CBWWTP during the low-demand winter period and release it back to the network during the peak irrigation season to support vineyard irrigation in the McLaren Vale region.

Treated water is transferred from the CBWWTP to the Seaford Heights, Bakewell Road facility, which is then pumped to the Whittings Road facility. Filling of each water storage facility will generally begin in April, with inflow rates governed by water availability. A maximum programmed transfer rate of 16 ML/day is set via the Supervisory Control and Data Acquisition (SCADA) system, with inflows expected to average around 10 ML/day, resulting in an approximate 65-day filling period. Once full, each water storage facility will be held at full supply level until December, when controlled releases are made back into the WBW network under pressure for distribution to irrigation customers. The clay lined basin acts a water cap to manage odour during periods when low water levels are experienced.

5.3.2. Inspection Monitoring & Safety Management

A comprehensive surveillance and safety program will be applied, consistent with ANCOLD Guidelines on Dam Safety Management (2003). This program is based on the existing Seaford Heights (SRWRA) dam operations, Maintenance and Inspection framework and includes:

1. regular inspections;
2. monitoring of structural and hydraulic performance;
3. collection and evaluation of surveillance data; and
4. periodic reporting and independent review.

Four levels of safety inspections are undertaken:

- **Routine Visual Inspections** – Conducted tri-weekly by trained operations personnel to identify defects, structural changes, seepage, vegetation issues, erosion, damage to the HDPE liner, and general maintenance requirements.
- **Intermediate Inspections** – Annual inspections led by a dam engineer, involving detailed review of structural condition, surveillance data and operational performance.
- **Comprehensive Inspections** – Undertaken every five years by engineers and specialists, involving full inspection of all embankments, structures, mechanical equipment, hydrology and consequence category review, along with a reassessment of the O&M Manual and Dam Safety Emergency Plan.
- **Special/Emergency Inspections** – Undertaken following unusual events such as floods, earthquakes, rapid drawdown or other circumstances that may affect dam integrity.

The Operations Management Plan provided in **Appendix 5** provides additional information on these routine inspections and monitoring.

5.3.3. Midge Fly Management

The proposed development will incorporate a comprehensive midge management framework, modelled on the established multi-barrier system implemented at the SRWRA Seaford Heights water storage facility (**Appendix 6**).

Midge management strategies are grouped according to the severity of the midge fly infestation.

Response Level 1

Triggered when monitoring detects midge numbers above baseline.

Actions: Increase 'Bacillus thuringiensis israelensis' ('Bti') dosing to weekly, apply insecticide to secondary barriers, increase monitoring to twice weekly, and conduct fortnightly visual inspections of nearby housing.

Response Level 2

Implemented when midge numbers continue rising or community complaints occur.

Actions: Increase Bti dosing to twice weekly, activate white-light attraction to draw midges to treatment zones, apply targeted insecticide spraying, undertake daily monitoring, and conduct weekly housing-area inspections.

Response Level 3

Emergency response for significant, persistent outbreaks.

Actions: Rapidly draw down water levels to remove habitat, or apply methoprene to prevent larvae developing into adults

In addition to the above-mentioned response strategies, WBWC will actively apply Bti at a rate of 1.8kg per hectare on a fortnightly basis as a baseline measure to manage insect populations during the irrigation season.

5.3.4. Fencing

The site will be secured by 1.8 metre high chain mesh fencing installed predominantly around the perimeter of each water storage facility. The design, height and materiality of the fencing is intended to restrict unauthorised access, while also mitigating visual impacts. The selective placement of landscaping will also be used to soften the appearance of the fence from important vistas.

Although an important element of the project, the fencing is prescribed under Schedule 13, Clause 2(1)(u) of the Regulations as a form of State Agency development which is exempt from requiring development approval.²

5.3.5. Employee Numbers

The facility is typically not staffed. During routine inspections up to two employees may attend the site on any one day.

5.3.6. Signage

In accordance with approval issued by SA Health for the use of recycled water through the Willunga Basin Pipeline, signage will be affixed to perimeter fencing to indicate the presence of reclaimed water, not suitable for human consumption.

² Subject to meeting prescribed conditions, the construction of a security fence for *water infrastructure* within the meaning of the Water Industry Act 2012 is a form of development under Section 131 of the Act which is exempt from requiring approval.

5.4. Traffic Access & Parking

As the development will not be staffed, traffic movements will be limited to occasional visits by WBWC employees and/or contractors to attend to miscellaneous maintenance matters and routine inspections. Accordingly, the ongoing operation of the development is not expected to result in any adverse traffic related impacts. Conversely, such impacts will be confined to the construction phase which could be addressed via the provision of a Traffic Management Plan.

Existing informal access tracks along Whittings Road and around the perimeter of existing vineyards will be retained, resurfaced and reused as access tracks by WBWC employees for access and maintenance purposes. These access tracks are positioned at the tow and crest of each water storage facility with connection to Whiting Road via a single access point. Excluding for construction, vehicle movements to and from the site will typically be limited to domestic vehicles.

5.5. Supporting Infrastructure

5.5.1. Distribution Pump Station & Rainwater Tank

A distribution pump station will be used to transfer water from the external drainage network to each water storage facility. Following a period of storage, water within each water storage facility is then transferred under gravity back to the pumping station, before being distributed to customers throughout the McLaren Vale region. Pumping equipment consisting of five, 75kW pumps will be housed within a 18m x 12m x 4m high (maximum) shed, clad in Colorbond® green. The shed is positioned on the low side of the southern water storage facility with site benching requiring nominal earthworks comprising a fill batter extending to an approximate height of 1 metre (Ref to Sheet No. 227 in **Appendix 4**). Attenuation, siting and orientation is accordance with the recommendations of the acoustic report (**Appendix 10**).

Roof water collected from the infrastructure shed will discharge to 22,000 litre rainwater tank, with overflow discharged in accordance with the stormwater management plan prepared by Tonkin.

5.5.2. External Infrastructure

Existing water distribution infrastructure (maintained by the WBWC and installed within local roads under a formal agreement with the City of Onkaparinga), will require extension/augmentation to facilitate the distribution of recycled water from treatment plants to storage facilities, and subsequently to sites throughout the serviced region. These external water distribution works will include the installation of a water pipe along Whittings Road, Kays Road, and through private land holdings (subject to formalisation and obtaining the necessary easements), before terminating in Amery Road.

These external works are prescribed under Schedule 13, Clause 2(1)(c) of the Regulations as a form of State agency development that is exempt from requiring development approval.

5.6. Vegetation Clearance

The native vegetation data report prepared by Jeremy Ross Carter (accredited native vegetation consultant) confirms that the site is predominantly occupied by native vegetation (**Appendix 8**). To accommodate the development the proposal requires the removal of the following trees:

- The removal of three (3) *Acacia Pycnantha*'s (Golden Wattles) situated to the south of the southern water storage facility, an in proximity to the pumping station;

- The clearance of 1.48 hectares scattered native flora, predominantly in the form of *Pteridium esculentum ssp. Esculentum* (Bracken Fern), to accommodate the southern water storage facility; and
- 0.012 hectares of woodland understorey to *Eucalyptus fasciculosa* (Pink Gum) to accommodate the vehicle access track.

No regulated or significant trees are proposed for removal.

Figure 5-3 illustrates the location of native vegetation proposed for removal. The numbering system on this plan coincides with that which is used within the native vegetation data report.

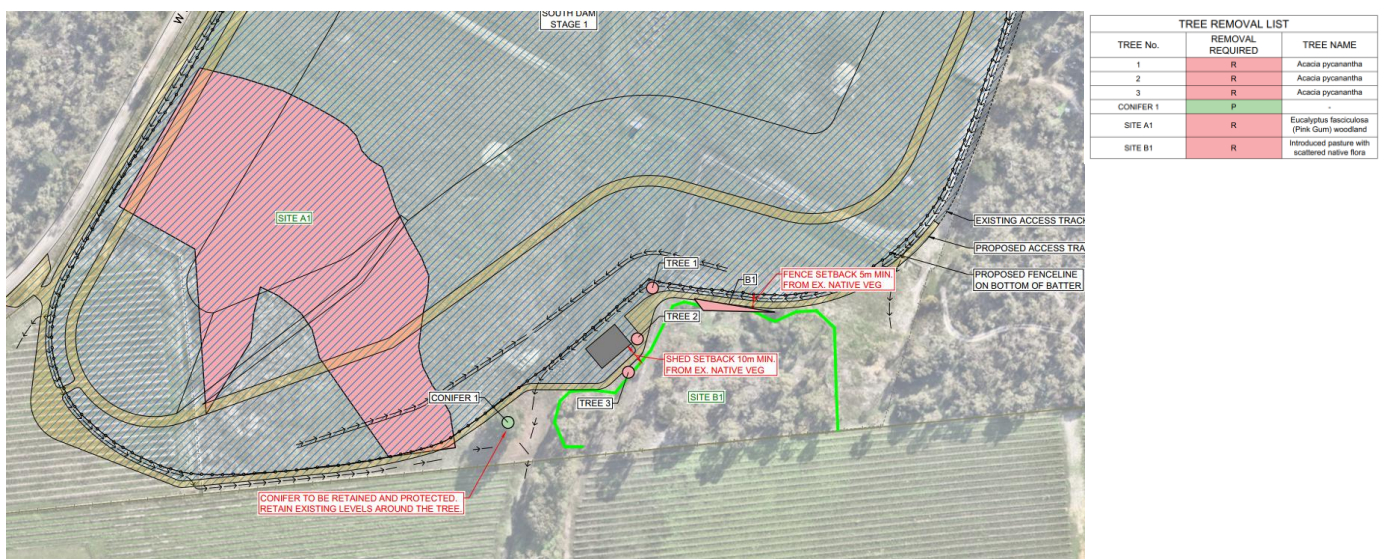


Figure 5-3 - Native Vegetation Removal Plan

5.7. Existing Residence

The development does not extend to the use of existing dwelling which occupies the site. This existing dwelling with either be retained and used as a residence or will remain vacant.

5.8. Staging

The Applicant proposes to apply for and complete the development in two stages. In particular:

- **Stage 1** will involve the construction of the southern water storage facility, associated access track, landscaping, native vegetation clearance, fencing enclosure, shed and pumping station.
- **Stage 2** will involve the balance of works, including construction of the northern water storage facility, associated access track, landscaping and fencing enclosure.

Staging arrangements for the development are illustrated in **Figure 5-4** below:

Stage 1 – Southern water storage facility



Stage 2 – Northern water storage facility

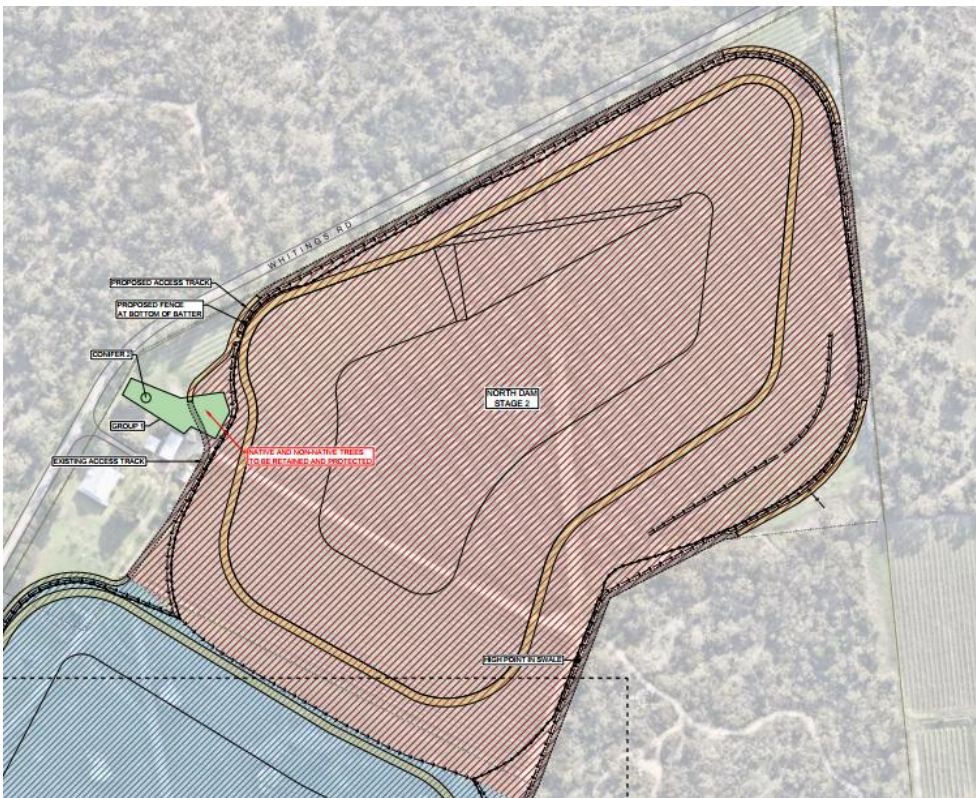


Figure 5-4 - Staging Plans

5.9. Timing for Delivery & Extended Operative Period of Consent

The Applicant is seeking approval for extended operative periods associated with the development consent. Specifically:

- **Stage 1: Substantial commencement** of works within **2 years** of the date of Development Approval.
- **Stage 2:** Commencement of construction will be subject to market demand for water resources and is anticipated to occur **5–10 years** after project initiation.

Accordingly, the application seeks consent for **substantial commencement within 2 years** of approval and **substantial completion within 10 years** of approval.

The extended timeframe for substantial commencement is necessary to allow for the preparation and finalisation of a Cultural Heritage Management Plan, which is a prerequisite of the North West Growth Area (NWGA) prior to the release of the project tender. This process requires additional time to ensure appropriate consultation, assessment, and compliance with all cultural heritage obligations.

6. PROCEDURAL CONSIDERATIONS

6.1. Policy Framework

Illustrated **Figure 6-1** below, the subject site is located entirely within the **Hills Face Zone** of the Planning and Design Code dated 26 March 2026 (Version 2026.6). Adjacent land to the east, south and west is similarly located within the Hills Face Zone, while land beyond these immediate properties is located within the Rural Zone. Land to the north, on the opposite side of Whitings Road, is located within the Conservation Zone.

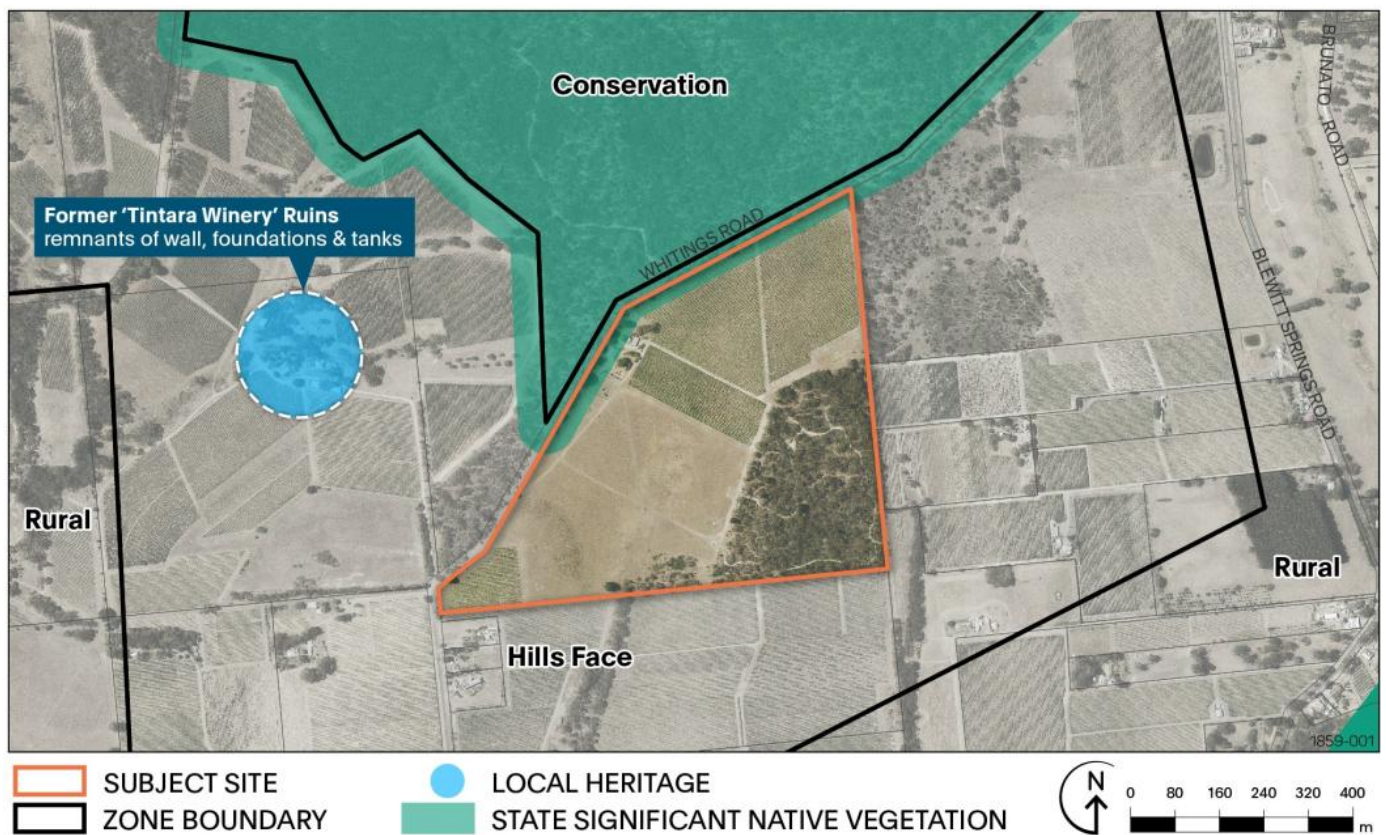


Figure 6-1 - Zone Map

6.1.1. Overlays

The following Overlays spatially apply to the subject site:

- Character Preservation District (Not in Township)
- Hazards (Bushfire – High Risk)
- Heritage Adjacency
- Native Vegetation
- Prescribed Water Resources Areas
- Prescribed Wells Area
- Regulated & Significant Trees
- State Significant Native Vegetation
- Water Resources

6.2. Nature of Development

In our opinion, the development is accurately described as follows:

Essential Water Infrastructure development comprising two (2) recycled water storage facilities with a combined capacity of 1.301 gegalitres, prescribed earthworks, a 18m x 12m x 4 metre high pumping shed and attached to a 22,000 litre rainwater tank, together with associated chainmesh fencing, native vegetation clearance and access tracks, to be delivered in two (2) stages, and substantially completed over an extended period of 10 years.

6.3. Assessment Pathway – Crown Assessment

The proposal received Crown Sponsorship from the Department for Infrastructure & Transport. Accordingly, the relevant Planning Authority is the Minister for Planning, who will make a determination on the application following receipt of advice prepared by the State Commission Assessment Panel (SCAP) as a delegate of the State Planning Commission (SPC).

6.4. Public Notification

Pursuant to Section 131(13) of the Act, the application will be subject to public notification as the total estimated value of the works (\$41.75 million across both stages) will exceed \$10 million.

The minimum public notice period is 15 business days (or a longer period as determined by the Relevant Authority), and any person with an interest in the development may make written submission on the development. The State Commission Assessment Panel (SCAP) must also provide reasonable opportunity for a person who has made a written submission within this time period the opportunity to appear personally (or by representative) to be heard in support of their submission.

6.4.1. Community Engagement

The WBWC has completed early engagement with nearby land owners and occupiers and other key community stakeholders and interest groups in the McLaren Vale area with the purpose of raising awareness of the project, obtaining local information to assist with development of the proposal in its formative stages and allowing opportunity for community members to ask questions about the proposal and understand how it may affect them.

This approach is intended to provide timely and accurate information to interested persons, enable early feedback and building relationship with the local community to support future operation of the site (subject to the necessary approvals being obtained).

6.5. Agency Referrals

6.5.1. Native Vegetation Council

The application proposes the clearance of three (3) native Acacia Pycnanthas, together with the clearance of 1.48 hectares of scattered native flora to accommodate the southern water storage facility (mainly Pteridium esculentum ssp. esculentum – Bracken Fern) and 0.012 hectares of Eucalyptus fasciculosa (Pink Gum) woodland understorey. As the vegetation is located on land to which the Native Vegetation Overlay applies, and as the vegetation removal constitutes ‘Level 3’ clearance, a referral to the Native Vegetation Council is required.

The State Significant Native Vegetation Overlay occupies portion of the site’s northern frontage to Whittings Road. The development does not propose the clearance of any native vegetation located where this Overlay applies.

6.5.2. Department of Environment & Water

Pursuant to the Prescribed Water Resources Overlay, a referral to the Department of Environment and Water (DEW) is required where the Relevant Authority determines that the development comprises the erection, construction, modification enlargement or removal of a dam, wall or other structure that will collect or divert, or collects or diverts surface water flowing over land. As the proposed development requires some diversion of upstream flows around each water storage facility, we understand the relevant authority may form the opinion that the proposed development requires referral to DEW.

6.5.3. City of Onkaparinga

In addition to the above-mentioned Agency referrals, the City of Onkaparinga will also be invited to provide comment / feedback on the proposed development in accordance with Section 131(6) of the Act.

6.5.4. Other Referral Considerations

Pursuant to Practice Direction 14, the proposed use (Essential Water Infrastructure) does not constitute 'Sensitive Use'. Additionally, while the proposed use is not specifically listed within the Land Use Sensitivity Hierarchy (Table 1), it is comparable to those other Primary Production uses listed under Item 3. Accordingly, there is no change in land use sensitivity and a formal referral to the EPA is not required in our view.

6.6. Other Consents

The landscape plan prepared by Wax proposes supplementary native vegetation plantings within the Whitings Road verge. A separate approval under Section 221 of the *Local Government Act 1999* will be required for these additional verge landscaping works.

In addition, the extension of underground water infrastructure along local roads, including Whitings Road, Kays Road and Amery Road may also require a separate consent from Council. However, we understand that these works are intended to be undertaken under an existing agreement with the City of Onkaparinga.

7. PLANNING ASSESSMENT

While assessment of a Crown Development application need not be limited to a consideration of the provisions set out within the Planning and Design Code (the 'Code'), this planning instrument is particularly useful in guiding the identification and resolution of local planning matters, as they relate to the development in question.

Accordingly, the following section of this Planning Statement provides a comprehensive assessment of the development against the most pertinent provisions of the Code. Section 7.2 also addresses the project's alignment with other state wide strategic objectives, particularly in relation water conservation and reuse, and tourism within the Willunga Basin Region.

7.1. Land Use & Intensity

The Hills Face (HF) Zone primarily seeks to accommodate low-intensity agricultural activities which maintain the western slope of the South Mount Lofty Ranges (DO 1). Land uses and activities should be low-intensity and low-scale, and should complement the natural, rural, and scenic qualities of the hills face landscape (PO 1.1 & PO 1.2). The Zone also specifically speaks to horticultural activities, where designed to minimise environmental impacts, including native vegetation clearance and adverse impacts on waterbodies (PO 6.1 & 6.3). PO 7.1 also speaks to the establishment of low intensity tourist facilities, which are commonly located on land used for viticulture.

Additionally, a fundamental objective of the Character Preservation District (CPD) Overlay is to ensure the long-term preservation of land beyond township boundaries for primary production and associated value-adding enterprises.

While the proposed land use (namely, Essential Water Infrastructure) is not explicitly listed as a contemplated form of development within the Zone, its core purpose for storing recycled water for reuse in regional horticultural and primary production activities is, in our view, consistent with the intent of both the land use provisions of the Zone and the CPD Overlay. That is, the proposal is a 'value adding' enterprise which supports and is arguably critical to the long term sustainability of primary production and notably the wine industry, given the sectors growing reliance on recycled water. South Australia's wine industry is also a fundamental component of the State's tourism sector, including Gross Domestic Product derived from this industry.

The current and projected water security challenges pose a significant risk to the long-term viability of the wine grape industry in the McLaren Vale region. These challenges also limit the region's capacity to diversify into other irrigated crops. Without reliable access to suitable water, the region faces constraints in maintaining productivity and attracting future investment and growth.

As stated within the BMCG business case (2025)³ McLaren Vale is a major grape-producing region, with an annual harvest of approximately 35,000 tonnes, valued at around \$60 million. While this represents a small share of Australia's total grape production by volume, BMCG notes that it accounts for nearly 20% of the nation's total 'premium' crush grapes valued at over \$1,500 per tonne. Shiraz is the dominant variety, with average prices exceeding \$2,000 per tonne in 2021, compared to a national average of \$650–\$700 per tonne. This highlights the premium nature of McLaren Vale's wine industry and underscores the importance of securing its future.

³ BMCG, 2025, *McLaren Vale Irrigation Water Security Project*, 12 Pirie Street, Adelaide, South Australia

The region also plays a vital role in employment and tourism, with BMCG (2025) noting that it supports an estimated 2,500 full-time equivalent (FTE) jobs in the wine industry and generating approximately \$160 million annually in tourism expenditure, much of it wine-related.

Given the limited availability of high-quality groundwater and the high cost of using potable water for irrigation, access to recycled water is critical for the region's long-term sustainability. Recycled water offers a cost-effective and reliable alternative that supports both environmental and economic resilience.

Importantly, a significant portion of the region's grape production is exported. The ability to market McLaren Vale as a 'highly sustainable' wine region enhances its appeal in international markets and strengthens the brand. The use of recycled water, rather than potable or groundwater, directly supports this sustainability narrative.

For the reasons outlined above, the proposed use of the land for the provision of essential water infrastructure supports for types of uses specifically referenced by the Zone and Overlay.

7.2. Land Use & Strategic Alignment

The proposed use is also closely aligned with the broader state-wide strategic objectives, particularly given the critical role of viticulture in supporting South Australia's tourism and agricultural sectors.

7.2.1. Greater Adelaide Regional Plan

The Greater Adelaide Regional Plan (GARP) highlights the importance of recycled water schemes in supporting future growth in South Australia's primary production regions. A long-term strategic objective of the GARP includes sourcing climate resilient water supplies and supporting infrastructure that can meet the needs of a growing population and economy, while maintaining affordability.

These alternative water sources (are also referred to as 'climate-independent' sources) are pivotal to increasing the state's overall water security. Greater reliance of purified recycled water is one of several alternative water supply options referenced within the GARP.

Long-term strategic objectives pertaining to primary industry includes initiatives that facilitate appropriate 'value-adding' and diversification in rural areas, including associated ancillary land uses and industries, such as storage, warehousing and logistics. The proposal is an associated value adding form of development in that it will provide for the storage of an alternative water source that will assist to future proof the region's agricultural and horticultural sector. Providing a ready supply of suitable irrigation water amidst a looming water shortage also supports diversification ventures.

7.2.2. State Planning Policies

7.2.2.1. State Planning Policy 5: Climate Change

Ground water currently makes up between 40-50% of non-potable water used within the region and has traditionally been a reliable, cost effective and important source of water for irrigation within the McLaren Vale region.

Although current groundwater use remains below both the sustainable yield and the total volume of licensed allocations, its declining quality is making it increasingly unsuitable for irrigation.

BMCG (2025) notes that a recent review of the region's Water Allocation Plan (WAP) has identified rising salinity levels, particularly in several salinity "hot spots" in the regions northeast. In some of these areas, salinity has exceeded 1,500 mg/L, rendering the water marginal for viticulture. For many growers in these zones, recycled water is the only viable alternative.

Looking ahead, continued groundwater quality decline (exacerbated by the impacts of climate change) is expected to reduce groundwater availability. As a result, more growers will likely need to transition from groundwater to recycled water for irrigation.

In accordance with State Planning Policy 5, the project proposes to increase the availability of high quality recycled water to Willunga Basin Region. In doing so, the project will support existing and future horticultural operations within the region, providing a much needed alternative water source which will directly assist to mitigate the impacts of climate change, and the reduced availability and useability of ground water.

7.2.2.2. State Planning Policy 8: Primary Industry

State Planning Policy 8 recognises the important role of primary industries in supporting South Australia's tourism and service sectors, including associated infrastructure that supports their production and marketing. SPP 8 identifies climate change and the availability of suitable water sources as important factors in the viability of primary industries. Supporting policy seeks to ensure regional conditions remain suitable for both continued investment and diversification.

The proposed delivery of essential water infrastructure which provides the region with a reliable alternative water source supports these policy objectives. It strengthens the resilience of existing primary industries and enables future industry growth by ensuring access to secure, climate-resilient water supplies.

7.2.2.3. State Planning Policy 14: Water Security

State Planning Policy 14 emphasises the need to preserve existing water resources and to identify alternative water supplies to ensure long-term resilience as future water demand increases. A key direction of the policy is the strategic planning for water reuse in agricultural contexts, particularly to support South Australia's intensive horticulture and broader agricultural industries. In this context, the harvesting and reuse of recycled wastewater for agricultural purposes directly aligns with the policy objective, as it provides a reliable, climate-independent water source that reduces pressure on existing groundwater and surface water systems. This approach supports sustainable land use, enhances water security for primary production, and contributes to the State's broader climate adaptation goals.

7.2.2.4. State Planning Policy 22: Special Legislative Scheme Character Preservation (McLaren Vale) Act 2012

The intent of this policy is to protect the five character values identified by the Act, including the viticultural, agricultural, and associated industries that operate throughout the district. Policy 22.2 specifically encourages development that supports these industries and their ongoing viability. In this context, the proposed water storage facilities represent essential water infrastructure that will provide an alternative and supplementary water supply for both agriculture and horticulture within the region. By enhancing water security, these facilities directly contribute to the resilience and productivity of the district's primary production industries and align with the broader policy objective of safeguarding the district's valued rural character.

7.2.3. 2070 McLaren Vale Regional Water Security Strategy (Draft)

The development strongly aligns with the draft McLaren Vale Regional Water Security Strategy because it directly supports the region's shift toward climate-independent, integrated, and circular water systems. The strategy highlights recycled wastewater as a critical supply source that will become increasingly important under hotter and drier climate conditions, while also noting that a large volume (approximately 6,000 ML/year) is currently discharged to the Gulf instead of being reused. By capturing and storing this water for horticulture and viticulture, the facility helps reduce reliance on groundwater (which is projected to decline under

climate scenarios) and contributes to meeting rising irrigation demand, which may increase by almost 30% by 2070 even without crop diversification.

The project also advances several of the strategy's priority actions, particularly those aimed at increasing recycled water use, integrating water sources, and expanding storage capacity so water can be held outside peak demand periods. It supports the vision for a circular economy by repurposing wastewater that would otherwise be discharged to the Gulf St Vincent, helping achieve the goal of “no wastewater outflow to the sea” while enabling agricultural productivity and regional diversification opportunities. In doing so, the facility strengthens regional water security, supports sustainable land use, and aligns closely with both the environmental and economic directions set out in the strategy.

Both DEW and SA Water have also expressed their written support for the proposed development.

7.3. Visual and Landscape Impacts

The subject site is located within the Character Preservation District (Not in Township) Overlay. The CPD Overlay seeks to recognise, protect, and enhance the district's special character, while promoting the long-term use of land for primary production and associated value-adding enterprises. As outlined above, the development's core purpose for storing and distributing water for reuse in primary production, is directly aligned with these intended land-use outcomes.

The Overlay includes provisions to ensure that new development is sympathetic to, and preserves, the district's unique character. Development should retain natural site features, including existing topography, watercourses, and mature vegetation (PO 3.1). New buildings should be sited below ridgelines to avoid interfering with skyline views (PO 3.2), use low-reflective materials and complementary colours, and be positioned to minimise visual bulk when viewed from roads or open areas (PO 3.3 and PO 3.4). PO 3.6 also discourages long, steep access tracks requiring excessive grading. Comparable expectations are found in Hills Face Zone PO 8.1 and PO 8.2, which promote access tracks that follow land contours, use darker surfacing materials, and avoid steep slopes.

The Overlay further seeks to limit earthworks, with PO 4.1 indicating that excavation and filling should only occur where necessary to minimise visual impact or for the construction of water storage facilities. DPF 4.1 recommends that earthworks not exceed 1.5 metres from natural ground level. Similarly, Zone PO 3.1 seeks to limit earthworks to protect natural landforms and native vegetation, with DPF 3.1 recommending excavation not exceeding 2 metres below natural ground level or fill not exceeding 1 metre above natural ground.

Key visual elements of the proposed development include each water storage facility and associated earthworks to achieve the turkey nest formation, perimeter security fencing and access tracks.

Perimeter fencing is required to prevent unauthorised access to each water storage facility. Although this type of fencing is not typical within a rural setting, its permeable design and constrained height will assist to mitigate its visual impact. The fence is also offset from Whitings Road, and existing and proposed landscaping will soften its appearance, as shown in **Figure 7-1**.

Access tracks are required for maintenance of the water storage facilities. The proposal utilises existing established tracks currently used to access existing vineyards, located to the south and east of proposed water storage facilities. Existing but less-defined access points which run parallel with Whitings Road will also be used. Extensions to these existing tracks will be surfaced in rubble consistent with typical rural accessways. Designed to follow existing contours, these tracks require minimal earthworks, and selective planting will further obscure views of them, as illustrated in **Figure 7-1**. Notably, the landscape plan prepared by Wax includes vegetation along Whitings Road, where views of access tracks will be most prominent.

The infrastructure shed is significantly set back from Whittings Road and will be constructed in Colorbond® green to blend with the surrounding rural landscape. Existing and proposed vegetation will largely obscure views of the structure, resulting in negligible visual impact when viewed from Whittings Road or nearby properties.

The extent of earthworks exceeds the recommended maximum heights expressed in CPD Overlay DPF 4.1 and Zone DPF 3.1. However, the scale of earthworks is largely unavoidable due to the functional requirements of the water storage facility, and the Code explicitly anticipates earthworks for such facilities. The visual impact analysis undertaken by Wax Design (summarised below) demonstrates that modest embankment gradients, the planting of native grasses on embankments, and selective tree plantings to supplement existing native vegetation will effectively mitigate visual impacts, including the change in existing land gradient, preserving the established rural character.

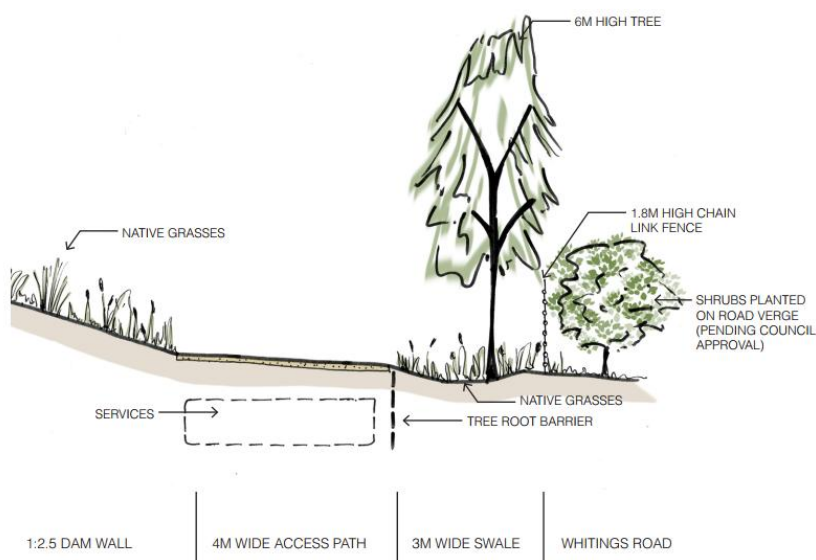


Figure 7-1 - Whittings Road Cross Section (Source: Wax Design Report)

7.3.1. Visual Impact Analysis

Wax Design were engaged by the Applicant to conduct a visual impact analysis of the development (**Appendix 7**). The findings of that analysis then informed elements of the design and specifically the placement and selection of plantings to soften the development’s visual impact.

For the purposes of the visual impact assessment, **Figure 7-2** identifies the locality for the development, which extends up to:

1. the edge of Chapel Hill Road, north of the site;
2. land to the north, including Onkaparinga River National Park;
3. surrounding vineyards and the Manning Fauna and Flora Reserve to the west;
4. surrounding vineyards and residential properties to the east, up to the edge of Blewitt Springs Road.

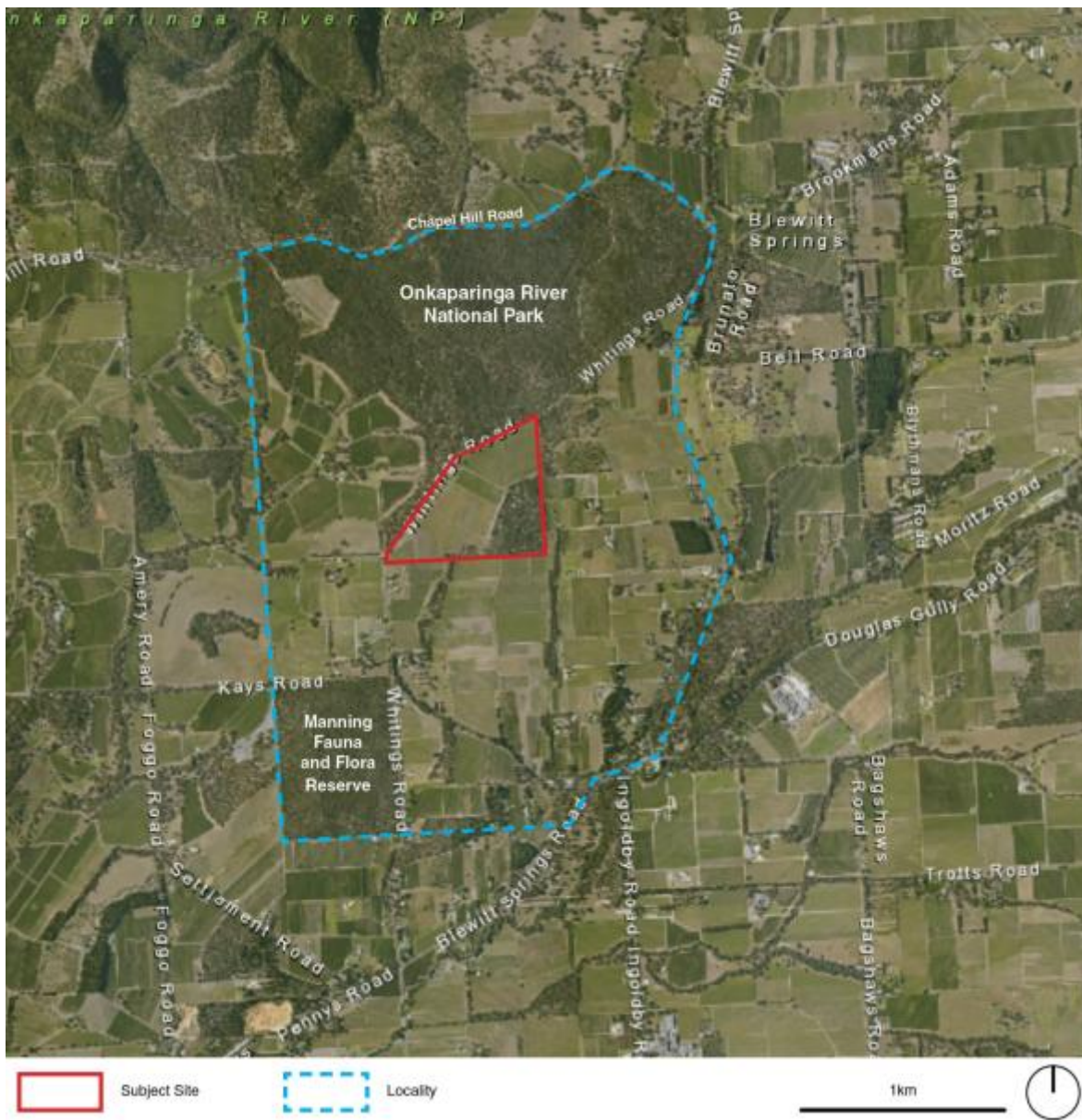


Figure 7-2 - Site and Locality (Source: Wax Design Report)

The outcome of the visual impact analysis is contained within Section 3 of the Wax Report. A summary of the findings of this assessment is provided below:

- Whiting's Road (south-east of the subject land):** Dwellings located at 175, 186, 192 and 194 Whiting's Road are orientated away from the development which in-turn reduces the visual impact of the development when viewed from within individual dwellings. However, the development will result in some visual impact because of its proximity to these dwellings, local topography and vegetation features. The proposed landform will replace the vine covered slope with a more inclined, 1 in 3 vegetated landscape. Although the development will alter the visual character, the introduction of vegetation to the embankment batter will reduce its visual impact. Wax also note the limited 17-degree viewing corridor, which reduces the potential visual impact within the broader landscape context.

- **Whitings Road (adjacent the subject land):** The subject land’s northern boundary runs along Whitings Road for approximately one kilometre, where the dense woodland of the Onkaparinga River National Park will remain unchanged. The proposed water storage facilities will alter the southern side of the road corridor, introducing vegetated embankments that replace the existing open agricultural character. Existing ‘glimpsed’ southern views will be replaced with the vegetated embankment, with plant selection intended to supplement existing mature vegetation. While views to the Sellick Hill Range escarpment will largely remain, they may become partially filtered by new verge plantings.
- **Blewitt Springs & Kays Road (east & south of the subject land):** Blewitt Springs Road lies within a valley to the east of the subject land, while Kays Road is situated to the south at a lower elevation, following the natural topography. Due to these landform variations and the presence of significant native vegetation to the north-east, east, and south, views toward the subject land from these directions are highly limited. Established vegetation provides substantial screening, and the topography prevents meaningful visibility from distances greater than approximately 600 metres. As a result, the proposed development will have only a limited visual impact when viewed from the north-east, east, or south.
- **West of the subject land:** To the west of the subject land, several wineries are located at lower elevations, including the local heritage-listed former Tintara Winery ruins at Ox Hardy Winery. Due to the lower landform and intervening vegetation, views toward the subject land from the west are limited. A 60–130-metre-deep band of established native vegetation along Whitings Road provides an effective landscape buffer between the Tintara ruins and the proposed development, screening the subject land from this heritage location.

Concerning visual impacts, Wax makes the following conclusions:

In conclusion, the visual effect of the proposed development will be mainly experienced from two key locations, along Whitings Road adjacent to the subject land and directly south-east of the subject land. This is a result of the modification of the existing undulating topography and agricultural land-use to the constructed dam wall profiles and vegetated land cover. There will be limited visual effect experienced from the proposed development in the broader area due to local topographical variations and existing established vegetation, which will screen the subject land from many locations in the wider area.

The development of different landscape treatments across the subject land will provide mitigation of the visual effects over time. The potential for tree planting along the verge of Whitings Road is likely to screen the development further.

7.3.2. Management of Visual Impacts

Photomontages prepared by Wax provide a comparison of the alterations to the landscape post construction of each water storage facility and following establishment of plantings to mitigate visual impacts, at year one and five (**Figure 7-3** and **Figure 7-4**). The concept landscape plan is also appended to the visual impact assessment provided in **Appendix 7**.

The visual effects of the proposed development will be softened through targeted landscape treatments and ongoing site management. The surrounding locality already features defined visual envelopes, topographic variation, and substantial tree cover, all of which will assist to limit the development’s visibility and visual impact. As a result, the water storage facilities will be primarily visible only from immediate and along Whitings Road, particularly (but not only) at its north-eastern and southern extents, as illustrated in **Figures 7-3** and **Figure 7-4**.

Proposed boundary treatments and the use of native grasses, shrubs, and strategic tree plantings are proposed as strategies reduce the visibility of raised embankments. These landscape measures have been designed to reflect the established vegetated

ridgelines to the north, helping the new landform to blend into the existing landscape character. Although the development will replace the gentle slope of the existing vineyard with a vegetated embankment, the use of native species will enhance landscape amenity and biodiversity. Given the elevated nature of each water storage facility as well as surrounding vegetation, water held within each storage facility will not be visible externally, and accordingly there will be little indication that the site is actually used for the storage of recycled water.

In paragraph 5.1.8 of their analysis, Wax concludes that the *“while the dams will alter the immediate appearance of the site, their long-term establishment will complement and enhance the locality’s existing patterns of vegetation and landform, ensuring that the overall visual effect remains compatible with the landscape character of the locality”*.

Figure 7-3 - Whittings Road – Looking North



EXISTING VIEW FROM WHITINGS ROAD LOOKING NORTH



VIEW OF DAM PROJECT POST CONSTRUCTION (1 YEAR)



VIEW OF DAM PROJECT 5 YEARS AFTER CONSTRUCTION

Figure 7-4 - Whittings Road - Looking west



EXISTING VIEW FROM WHITINGS ROAD LOOKING SOUTH



VIEW OF DAM PROJECT POST CONSTRUCTION (1 YEAR)



VIEW OF DAM PROJECT 5 YEARS AFTER CONSTRUCTION

7.4. Interface Considerations

7.4.1. Odour

The air quality (odour) assessment performed by Vipac is attached as **Appendix 9**.

PO 5.1 of the Interface between Land Uses module seeks to ensure development is designed to manage and mitigate the impacts of odour on nearby sensitive receivers.

Consistent with the SA EPA Wastewater Lagoon Construction Guidelines (2019) (the Guidelines), the odour assessment performed by Vipac was informed by in-field surveys of comparable treated water storage facilities situated at Bakewell Drive and Quarry Road. Importantly, both facilities are operated and managed by WBWC and operational standards and practices applied to each are the same as those proposed for this facility. As per the proposed development, treated water for each facility is also received from the Christies Beach WWTP. Although a small water storage facility, we note that the Bakewell Drive facility, is positioned closer to larger number of dwellings.

Vipac's assessment considers potential odour-related impacts on amenity on the closest sensitive receivers, described as a "cluster of three residential properties located approximately 60 metres or more southeast of the proposed dam's activity". These properties are located 186, 192 and 194 Whitings Road.

Vipac notes that odour generated by wastewater lagoons is often influenced by construction methods and/or the biological composition of wastewater. It is also suggested that environmental harm may result where poorly constructed lagoons leads to surface and groundwater pollution, generating odour and other adverse health impacts. Acidic, alkaline or saline wastewater (from wineries, distilleries and reverse osmosis plants) may also react with clay, which in-turn could lead to leakage. However, in this instance, the use of a geosynthetic liner will reduce the risk for odour emissions. Vipac also notes that the recycled water is less prone to odour emission as the tertiary treatment process to all stored water reduces chemical pollutants and biological contaminants which could generate odour.

The odour assessment methodology is documented in Section of the 4 of the Vipac report, and the results are discussed in Section 5. Further the in-field surveys and observations, Vipac makes the following conclusions:

The findings of the in-field odour surveys indicate that odours generated by the treated water storage dams are of a non-offensive nature, of very mild intensity, and were generally only perceptible infrequently and intermittently, even in close proximity to the source.

Based on the findings of the odour surveys, Vipac considers that the proposed development does not pose a significant odour-related amenity risk to the nearest sensitive receptors. The existing separation distances are deemed appropriate given the low odour intensity and potential for infrequent winds from the source towards receptors.

Overall, Vipac concludes that the potential for odour impacts should not be considered a hinderance to the proposed development, provided that the proposed control measures are implemented, i.e. the use of a water cap during periods of low water levels and the dams and water are appropriately maintained and is supplied with tertiary treated water, as proposed.

On the basis of the assessment performed by Vipac, in our opinion the proposed development is aligned with the Interface between Land Use module relating to the management of air emissions (odour).

7.4.2. Acoustic Considerations

The acoustic assessment performed by Echo (**Appendix 10**) evaluates the impacts of noise generated by pumping infrastructure on adjacent sensitive receivers, identified in **Figure 7-5** below:

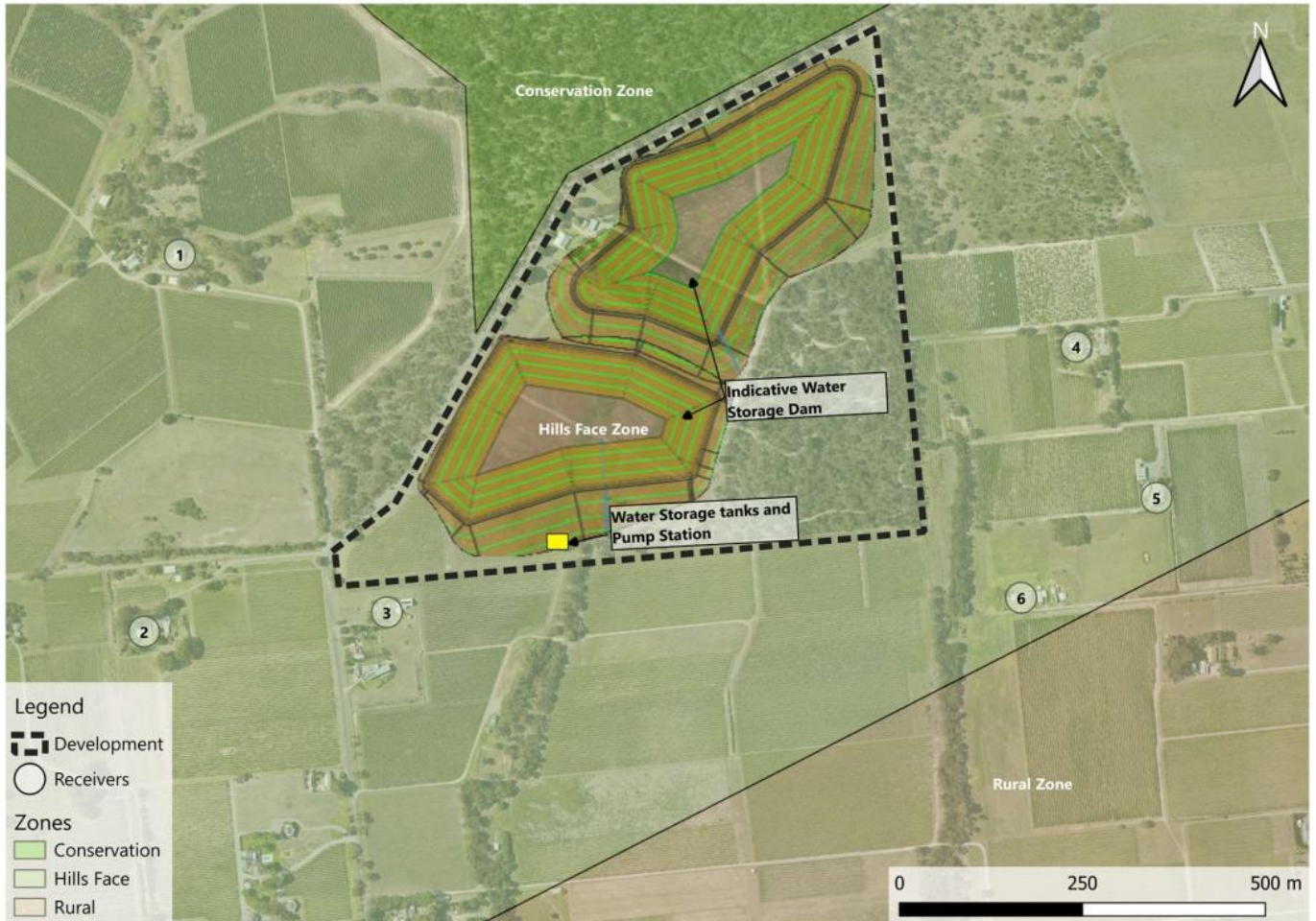


Figure 7-5 – Proximity of development relative to sensitive receivers (Source: SAPPA cited in Echo, 2025)

The final design of the pump shed and equipment selection is subject to resolution during the detailed design phase of the project. Accordingly, the analysis by Echo considers two operational scenarios:

- Scenario 1:** the proposed pumpstation being equivalent to the Willunga pump station comprising five (5) 90kW pumps, including a roller door, personal access doors, and ventilation louvres.
- Scenario 2:** the proposed pump station being equivalent to the Aldinga pump station comprising five (4) 45kW turbine pumps with a ventilated roller door and personal access door.

Across both scenarios, it is assumed that five pumps will operate simultaneously throughout the night, and that access doors will remain closed.

PO 1.2 and 4.1 of the Interface between Land Uses module suggests that development adjacent sites accommodating sensitive receivers should be designed to minimise adverse impacts. DPF 4.1 suggests that one way to achieve this outcome is for development to satisfy the relevant noise criteria of the Environment Protection (Commercial and Industria Noise) Policy criteria

(the Policy). Where required, hours of operation for non-residential uses should be moderated to assist with the management of interface impacts, having due regard to:

- (a) Nature of development
- (b) Measures to mitigate off-site impacts
- (c) The extent to which the development is desired in a zone
- (d) Measures which may be adopted in an adjacent zone, primarily intended to accommodate sensitive receivers that mitigate impacts without unreasonably compromising the intended use of that land.

Plant and equipment should also be sited and designed to minimise noise impacts, including by maximising setbacks from sensitive receivers, locating noise generating activity within enclosures and/or via the use of acoustic barriers (PO 4.2).

Echo notes that the Policy assigns the following equivalent noise levels (L_{Aeq}) when assessed at the closest sensitive receivers:

- 7:00am to 10:00pm - L_{Aeq} of 47 dB(A)
- 10:00pm to 7:00am – L_{Aeq} of 40 dB(A)

Predicted noise levels for each operational scenario is displayed in **Figure 7-6** over-page. The results account for a 5 dB(A) penalty on account of tonal characteristics which can occur with some pump types. As illustrated, the goal noise levels of 40 dB(A) can be achieved, subject to the following noise control levels being implemented:

- Ventilation openings and doors shall be situated on the northern and eastern sides of the pump shed (reflected on the attached plans for the pump station)
- All doors shall remain closed except when access to the shed is required
- All pipework external to the pump shed shall be below ground
- The pump shed shall be constructed from 0.42 BMT sheet steel or an acoustic equivalent

Subject to the above design and management controls, Echo concludes that the *“development can be located and designed to manage environmental impacts and not unreasonably impact the amenity of existing dwellings. In doing so, the development satisfies all the relevant Planning and Design Code provisions relating to environmental noise”*.

Scenario 1



Scenario 2



Figure 7-6 Noise Contour Maps (Source: Echo)

7.5. Vegetation Clearance

The site is subject to an assessment against the relevant provisions of the Native Vegetation Overlay, and the Regulated and Significant Tree Overlay. Accordingly, protections against the removal of vegetation under both the Native Vegetation Act 1991 and the PDI Act apply to the proposed development.

Regulation 3F(1) & (2) of the *Planning, Development and Infrastructure (General) Regulations 2017* prescribes the minimum circumference measurements for regulated and significant trees. However, Regulated 3F Cl. (4)(d) prescribes that Regulation 3F(1) & (2) does not apply to a “tree that may not be cleared without the consent of the Native Vegetation Council under the Native Vegetation Act 1991”.

While the State Significant Native Vegetation Overlay also applies to north-eastern portion of the site’s frontage to Whittings Road, it is noted that the development does not propose the clearance of any native vegetation from land to which this overlay applies.

7.5.1. Native Vegetation

The native vegetation data report prepared by Jeremy Ross Carter (accredited native vegetation consultant) confirms that the site is predominantly occupied by native vegetation (**Appendix 8**).

To accommodate the development, clearance of the following native vegetation is proposed:

- The removal of three (3) *Acacia Pycnantha*’s (Golden Wattles) situated to the south of the southern water storage facility, in proximity to the pumping station;
- The clearance of 1.48 hectares scattered native flora, predominantly in the form of *Pteridium esculentum ssp. Esculentum* (Bracken Fern), to accommodate the southern water storage facility; and
- 0.012 hectares of woodland understorey to *Eucalyptus fasciculosa* (Pink Gum) to accommodate the vehicle access track.

The Native Vegetation Overlay seeks to ensure development is sited to avoid, or minimise the clearance of native vegetation, accounting for the siting of buildings, access points, bushfire protection measures and building maintenance obligations (PO 1.1.).

Where clearance is proposed, PO 1.2 suggests that vegetation removal should avoid:

- (a) significant wildlife habitat and movement corridors;
- (b) rare, vulnerable or endangered plant species;
- (c) highly valued vegetation located in areas which have already been extensively cleared; and
- (d) native vegetation within a wetland environment.

PO 2.3 of the CPD Overlay similarly speaks to the preservation of mature trees which contribute to the unique character of the district.

Consistent with PO 1.1 and PO 1.2, the development is sympathetically sited to ensure that the majority of native vegetation situated on or in proximity to the site is preserved. In particular, the proposal avoids the clearance of a significant cluster of native vegetation to the south-east of the site, which forms part of a broader vegetated connections extending to the north and north-east (including the national park located north of Whittings Road), and links with several wildlife corridors to the south.

Proposed access roads have mostly been sited to avoid the clearance of native vegetation, and existing access roads are utilised (where possible) to avoid tree impacts. New roadways in proximity to trees will be constructed in 20mm quarry rubble, to a

nominal depth of 150mm, and the permeable nature of these surfaces will assist with minimising adverse impacts on retained trees. Security fencing and drainage infrastructure surrounding each water storage facility will be placed on the inside of access tracks, thereby maximising separation distances from mature vegetation to minimise tree impacts in accordance with the Native Vegetation Council's mitigation hierarchy.

While some native vegetation clearance is proposed and to some extent is unavoidable; the findings of the native vegetation data report confirms that vegetation proposed for clearance provides limited environmental or ecological value, such that its removal would not be contrary to the PO 1.2.

In addition to payment of the prescribed Significant Environmental Benefit (SEB) offset, the landscape master plan prepared by Wax includes the planting of native grasses and shrubs to supplement existing stands of native vegetation, reinforcing the localities natural character, increasing biodiversity and complementing the adjacent National Park. Accordingly, the landscape design is aligned with PO 1.4 of the Native Vegetation Overlay, which seeks the restoration and enhancement of biodiversity and habitat values through the revegetation using locally indigenous plant species.

7.5.2. Regulated & Significant Trees

Other than for one significant conifer to the south of southern water storage facility, the development site is devoid of regulated and significant trees. Although some planted mature vegetation surrounding the existing dwelling may also qualify as regulated or significant, the development is not positioned in proximity to these trees

The development has been sited to avoid the clearance of regulated and significant trees. Additionally, elements of the development have been sited and designed to minimise tree damaging activities, including by maximising setbacks of associated infrastructure (including access roads, drainage infrastructure and services) relative to regulated and significant trees, and by limiting earthworks and level changes in proximity to trees.

Accordingly, the development is aligned with PO 1.4 and 2.1 of the Regulated and Significant Tree Overlay:

PO 1.4: *A tree-damaging activity in connection with other development satisfies all the following:*

(A) it accommodates the reasonable development of land in accordance with the relevant zone or subzone where such development might not otherwise be possible

(B) in the case of a significant tree, all reasonable development options and design solutions have been considered to prevent substantial tree-damaging activity occurring.

PO 2.1: *Regulated and significant trees, including their root systems, are not unduly compromised by excavation and / or filling of land, or the sealing of surfaces within the vicinity of the tree to support their retention and health.*

7.6. Stormwater Management and Flooding

The arrangement for the collection and disposal of stormwater across the site as well as up-stream flows, has been addressed by Tonkin in the attached Stormwater Management Plan (**Appendix 11**).

A perimeter drainage swale is proposed to run along the tow of the southern and eastern embankments and will connect with one of two 'spreader' discharge points, designed to disperse post-development flows in a controlled manner, to replicate as much as possible, the existing undeveloped flow regime. Roof water collected from the pumping station will also discharge to the southern-most spreader discharge point.

To protect against erosion, each embankment will be vegetated (grassed) in accordance with the landscape design prepared by Wax Design (**Appendix 7**). Flow diversion banks installed along taller and longer embankments are proposed to intercept surface runoff, to assist with management and control of erosion. Each diversion bank will terminate at a rock chute, designed to function as form of erosion protection.

The stormwater design also addresses the collection and discharge of water at the interface between each water storage facility. Collected water will be conveyed to the south of the site via a 375mm diameter concrete pipe, with scour protection proposed at the outlet.

Water Sensitive Urban Design (WSUD) provisions for non-residential development are set out in PO 42.1, 42.2 and 42.3 of the Design in Urban Areas module. PO 42.1 and PO 42.2 relate specifically to water quality, suggesting that development should be designed to reduce the risk of sediment, suspended soils, grease and the like entering the stormwater system. Stormwater should also be a physical, chemical and biological condition which is equivalent to or better than its pre-developed state. PO 1.9 of the Water Resources Overlay, together with PO 1.2 of the Prescribed Water Resources Overlay also speak to maintaining the quality and quantity of water to protect both downstream users and downstream flows.

In relation to water quality impacts, Tonkin notes that the post construction development is not expected to adversely impact the quality of water runoff. Grassed batters and swales will assist with the filtration of contaminants, reducing pollutant loads exiting the site. Subject to the perimeter tracks being designed to grade internally, Tonkin suggests that any potential pollutants can be managed onsite, without the need for a formal filtration device (i.e. a gross pollutant trap or similar). Tonkin further suggests that the greatest risk of water pollution is during the construction phase, where the risk of erosion is at its greatest. Likely requirements for erosion and sediment control are detailed in Section 5.2 of the Tonkin report, and the provision of a Soil and Erosion Drainage Management Plan (SEDMP) is best managed via a condition of consent.

Together with PO 1.9 and 1.2 discussed above, PO 42.3 of the Design in Urban Areas module also suggests that stormwater management systems should be designed to mitigate peak flows and manage the rate and duration of discharge so as to not increase peak flows in downstream systems. In this case, Tonkin notes that there will be a reduction in post development flows and discharge rates, when compared with the existing situation. Accordingly, Tonkin concludes that *“measures to reduce the peak flows from each catchment are not considered to be necessary given the overall reduction in flow rates discharged from the site”*.

Accordingly, the development has been designed to effectively and efficiently manage the collection and discharge of stormwater in manner that aligns with the relevant WSUD provisions of the Code.

7.7. Traffic, Access and Parking

Given the nature of the use proposed, traffic generation will be negligible and limited to occasional domestic vehicle movements associated with general maintenance activities, with no more than two employees attending the site at any time. Given this, traffic movements associated with the use are highly compatible with the established rural character and will not result in any discernible adverse impacts on character or amenity. Given these limited traffic movements, no upgrades or alterations to existing road infrastructure is required.

The greatest traffic impact generated by the project will be during the construction phase. However, such impacts are temporary and can be appropriately managed via the implementation of a traffic management plan.

7.8. Bushfire Risk

The Hazards (Bushfire – High Risk) Overlay seeks to ensure development is sited and designed to minimise the risk of bushfires on life and property, accounting for the following:

- (a) Uncontrolled bushfire events, taking into account the increased frequency and intensity of bushfire due to climate change;
- (b) High levels of exposure to ember attack;
- (c) Impact from burning debris;
- (d) Radiant heat; and
- (e) Likelihood and direct exposure to flames from a fire front (DO 1).

Activities which increase the number of people working or living in areas of unacceptable bushfire risk, where evacuation might be difficult should be avoided (DO 2). Development should also facilitate emergency vehicle access to areas of high risk (DO 3).

The proposed development is not labour intensive and will not increase the number of people living or working onsite. While the proposed development will increase the site's gradient downslope of the existing dwelling, the water storage facility establishes a substantial low-fuel separation buffer between the dwelling and surrounding vegetation. As such, it effectively increases the defensible space available to the dwelling should it be re-occupied for residential purposes.

Site access tracks along the perimeter of each water storage basin and traversing each basin ridge provides access for emergency service vehicles in the event of a fire (inclusive of continuous access). Importantly, the access tracks provide access through to existing hazardous vegetation situated on the site and adjoining land.

If required, the development also provides ready access to water for fire-fighting purposes (acknowledging that additional infrastructure may be required to accommodate hose fittings etc. in accordance with best practice standards set out within MBS 008: Designated bushfire prone areas – additional requirements).

Accordingly, the proposed development meets the intent of the Hazards (Bushfire – High Risk) Overlay by reducing potential exposure, enhancing firefighting access, and avoiding any increase in population at risk.

8. CONCLUSION

This Planning Statement addresses the planning merits of a development application lodged by WBWC, for the construction of two (2) recycled water storage facilities with a combined capacity of 1.301 gigalitres, earthworks, a 18m x 12m x 4 metre high pump shed with associated rainwater tank, chainmesh fencing, native vegetation clearance & access tracks. The development is to be delivered in two (2) stages, and with an extended operative period of 10 years. The development is to occur over land located at 260 Whitings Road, Blewitt Springs.

An assessment of the proposal has occurred, with reference to the relevant provisions of the Planning & Design Code, and key strategic objectives identified within the GARP, SPP's and the draft 2070 McLaren Vale Regional Security Strategy. The proposed development received Crown sponsorship from the Department for Infrastructure and Transport, as a form of essential water infrastructure.

In our opinion, the proposal demonstrates alignment with State Strategic initiatives, and the Planning and Design Code for the following reasons:

- The water storage facilities will provide an alternative and secure water source for the region, supporting the long-term viability of primary production.
- The regional wine industry's viability depends on reliable irrigation water. Climate change and rising groundwater salinity are diminishing available supply and quality. The development will deliver a fit-for-purpose recycled water source to support viticulture and the broader tourism sector, which is increasingly reliant on alternative water sources for long-term sustainability. The proposal is accordingly consistent with the GARP, SPP 5, 8, 14 and 22, and the strategic directions of the draft regional water security strategy.
- The Hills Face Zone and Character Preservation District both contemplate the establishment of water storage facilities as value-adding rural infrastructure supporting primary production.
- The form of each water storage facility, combined with the site's undulating terrain means that notable earthworks are unavoidable. On the other hand, both the Zone and Character Preservation District seek to minimise earthworks to preserve the unique rural character of the region. Notwithstanding, the visual impact analysis by Wax Design confirms that visual impacts can be managed via future landscaping that will supplement existing landscaping, to achieve a visual outcome that will both complement and enhance existing vegetation patterns and landform, to ensure the overall visual effect remains compatible with the landscape character of the locality. Native plantings will enhance biodiversity and supplement existing vegetation on-site and on adjoining land. The pumping shed is generously set back from Whitings Road and its appearance is appropriate to the rural setting.
- In addition to visual impacts, interface considerations relate to odour and noise. The Vipac odour assessment of comparable WBWC facilities, indicates no unreasonable amenity impacts. The acoustic report by Echo, modelling two operational scenarios, confirms that noise emissions from pumping infrastructure will comply with relevant Noise Policy criteria at the closest sensitive receivers.
- Each water storage facility and associated infrastructure has been sensitively designed to preserve native vegetation on the site. The Native Vegetation Data Report confirms that vegetation proposed for clearance is of limited value, with no regulated or significant trees affected. The layout has been deliberately arranged to minimise tree-damaging activities.

- The stormwater management plan by Tonkin demonstrates that stormwater can be safely and effectively managed, with post-development flows lower than existing rates. Vegetated batters and swales will treat runoff, and flow diversion banks and spreaders will reduce erosion risk and maintain existing hydrological patterns. Construction activities will present the greatest erosion risk, which can be mitigated through the implementation of an appropriate SEDMP.
- The development will generate negligible operational traffic, with short-term construction impacts able to be managed through a construction traffic management plan.

Overall, the assessment demonstrates that the proposed development is strategically justified, environmentally responsible, and technically sound. It will deliver critical water infrastructure that enhances the long-term resilience, productivity and sustainability of the McLaren Vale region.