

State Planning Commission

ASSESSMENT REPORT

MOUNT LOFTY GOLF ESTATE AND RESORT

Mount Lofty Golf Estate Pty Ltd



May 2025

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MILESTONES

Milestone	Date
Declaration of Major Development	15 December 2020
Release of Guidelines	31 March 2022
Level of Assessment	31 March 2022
Release of DR for public comment	5 July 2023
Submission of updated DR (including response)	2 February 2025
Assessment Report finalised	15 May 2025

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1 Executive Summary

On 15 December 2020, the proposal to redevelop the Stirling Golf Club to undertake the Mount Lofty Golf Estate and Resort development at Golflinks Road Stirling was declared a 'Major Development' under s.46 of the *Development Act 1993*.

The proponent seeks to establish enhanced tourist accommodation facilities (88 rooms and/or serviced apartments), with ancillary function rooms, bar, restaurant, gymnasium and upgrade to the existing 18-hole golf course and for associated club facilities. A local heritage place will also be refurbished and extended to support for an adaptive retail, cafe and multipurpose function space.

Additional carparking will be provided to cater for increased on-site demand and traffic volumes, utilising both the existing Golflinks Road entrance and Old Carey Gully access point for both staff and visitors. An additional access will be provided for emergency vehicles to access the main hotel complex from Golflinks Road.

The key project benefits are considered to be the redevelopment of an existing golf course and new and upgraded facilities for members and visitors, the provision of new accommodation and serviced apartments within the Stirling area and Adelaide Hills more generally, the adaptive re-use of a local heritage place, environmental improvements to Cox Creek (particularly re-vegetation and weed removal works), improved connectivity to the Heysen Trail and along Golflinks Road, increase in local employment and demand for local goods and services, and a more general and sustained economic contribution to both the regional and state economy from increased economic activity.

Based on a comprehensive set of assessment guidelines, endorsed by the State Planning Commission (the Commission), the proponent prepared a Development Report (DR) to assess the potential environmental, social and economic impacts of the development.

The proposal (as addressed in the DR) was the subject of a six-week public consultation period, two public meetings, council and state government agency referrals. One hundred and seventy-seven (177) public submissions were received.

The main issues raised included the construction and operation of the development, specifically the extent of native vegetation removal (for both built form and fire safety reasons), impacts on native fauna and the increase in local traffic volumes and safety concerns along Golflinks Road.

The redevelopment was seen by a number of local residents (who made a submission) as leading to a significant loss of amenity (noise, traffic, light spill etc) and natural habitat (tree removal) for this community, who valued the area for its environmental attributes and relative seclusion.

The incorporation of 17 standalone accommodation pods and one service pod to the west of the main hotel complex and associated vegetation clearance impacts, both from the development footprint itself and hazard reduction requirements, was strongly opposed in public submissions.

The proponent carefully considered these concerns and undertook additional investigations and discussions with council, state agency and departmental staff and technical experts. An updated Development Report with supporting technical appendices was then prepared by the proponent.

This proponent's response is contained in three main documents:

- URPS cover letter and appendices relating to the response and further information sought by DHUD-PLUS (as a result of earlier adequacy checks).
- Updated Development Report (which includes responses to public, council and agency submissions and changes made to the project – essentially being the final, complete application).
- Technical Appendices from the Development Report – which have been updated where needed, reflective of changes to the project/new information.

This modified the project in a number of ways. The accommodation and service pods were removed from the development proposal, reducing overall vegetation impacts to seven scattered trees within the development area by 95% (from 1.716ha to 0.431ha). In addition, the Perfumery Gardens and Orchard were configured to retain additional trees.

Carparking and traffic volumes were also a key concern to be addressed.

Additional staff and visitor parking will now be provided to the café/perfumery site, accessed from Old Carey Gully Road and not Golflinks Road.

The proponent has also undertaken to widen Golflinks Road between 0.5 and 1 metres (along 75% of its distance between the Old Carey Gully Road intersection and the main entrance to the golf course), balancing a positive road safety improvement whilst limiting additional tree impacts within the road reserve. This will require the removal of 2 trees (one requiring NVC approval), and a further 8-9 trees being pruned (subject to final design details).

The Native Vegetation Council remains concerned with the loss of three Manna Gums to accommodate the hotel building; however, the design solution and project changes have minimised overall impacts to native vegetation on the golf course site.

Infrastructure upgrades have been proposed to the local sewer network and pump station, whilst secondary access points will also be rebuilt to council standards to appropriately service the development. SA Water has also confirmed that the Heathfield Wastewater Treatment plant can accommodate the additional inflows from the development.

To increase pedestrian safety a dedicated walking trail separated from cars is to be established, (primarily on the golf course land), adjacent to Golflinks Road, between Pump Station No2 and the golf course entrance. The final design of the walking trail will need to be resolved, to strike an appropriate balance between connectivity, environmental protection and construction cost.

These design changes and infrastructure upgrades directly address the concerns raised in the public submissions in general and local residents in particular.

Furthermore, additional information and/or clarification was provided in the updated Development Report on those matters of interest to the community, such as light spill, noise, road safety and social services. This information clearly demonstrates that amenity impacts can be minimised, taking into account the overall design, likely operation and significant setbacks and elevation change from more sensitive receivers situated to the south of Golflinks Road.

In combination, the proponent's documentation provides a detailed assessment of the environmental, social, and economic impacts of the proposal to the redevelopment of the Stirling Golf Course. The Assessment Report comprises a thorough consideration of the updated Development Report and additional Information provided by the proponent, along with the public,

council and agency submissions and advice received. Ultimately its findings represent the view of the State Planning Commission, having considered all the material before it.

The assessment process was informed through an early engagement with the SA Country Fire Service (which narrowed developability options for the tourism accommodation component given the high bushfire risk), and the Government Architect, where a design review process was undertaken with the proponent's architects, to carefully consider the proposal from a public realm and servicing perspective.

The Commission noted that the golf course site has been heavily modified, with the removal, re-growth and/or replanting of vegetation in association with its long-term recreational use, and that the development footprint, largely, seeks to rebuild the new hotel, clubhouse and carparking elements on existing building and clearance footprints.

Both the construction and operational components of the development will deliver a range of economic and social benefits from the proposal, particularly in terms of its accommodation offering, opportunities to partner with local Adelaide Hills businesses and new direct and indirect jobs within the hospitality sector.

There will be some residual impacts, however these can be managed through a range of management plans which will be required, firstly to manage an 18-month construction process, and secondly to ensure that hotel operations, particularly functions and events, are undertaken in accordance with current environmental guidelines to ensure sources of disturbance are minimised. A decision to approve the development can therefore be supported, having considered the environmental, social and economic impacts.

The Commission has made several recommendations in respect to potential condition-setting, including reserved matters requiring the submission of further information (such as a range of management plans and final documentation), set out in Section 15 of this Report.

These matters provide the framework for a robust and methodical process to be adopted in the project's finalisation, such that it can be appropriately developed and responsibly operated, noting the need to formally secure a range of other State government approvals, licences and permits (such as the determination of the final Significant Environmental Benefit (SEB) payment under the *Native Vegetation Act 1991*).

With the completion of the major development assessment process, the Commission's role has concluded. Whether the development is to be conditionally approved or refused, is solely a matter for the Minister for Planning under the *Planning, Development and Infrastructure Act*.

The Minister has complete discretion in these matters and there is no statutory time limit for a decision to be made. If a decision was made to approve the development, the proponent would then be able to seek the amendment or revocation of the open space proclamation, allowing for the further subdivision of the land (which seeks to separate off the golf course from the hotel component).

The outcome and timing of these decisions is a matter for other decision makers, in accordance with the requirements of those relevant legislative instruments.

2. Introduction

This Assessment Report considers the social, economic and environmental impacts of a proposal by Mount Lofty Golf Estate Pty Ltd to undertake a redevelopment of the Stirling Golf Club.

The development would comprise the provision of tourist accommodation in a new hotel building with a new clubhouse facility and pro-shop, administration areas and change rooms, retention and improvements to the 18-hole golf course, conservation works and adaptive reuse of a local heritage place to accommodate a multipurpose café, retail and function space, car parking in the order of 250 spaces, and tree removal (including native vegetation) and associated landscaping.

The project was declared a major development and subject to a Development Report (DR) level of assessment. There is no Commonwealth involvement in the state assessment process, as the proponent determined that no matters of national environmental significance under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) would be significantly impacted by the proposal.

The key objectives of the project are to improve the range of accommodation offerings and function areas in the Stirling area and Adelaide Hills, which would complement the existing operations and retention of the golf course and its members. The project aims to contribute to regional tourism and job creation through tourist accommodation option and event spaces. Investment into rejuvenating Cox Creek and weed reduction, improving Golflinks Road and provision of a safe public walking trail.

Based on the proponents' final Development Report document, this Assessment Report has been able to consider all relevant assessment issues relating to its economic, social and environmental significance to the Adelaide Hills region specifically and the state of South Australia more generally.

The first part of the report outlines the assessment process, project scope, public-council-agency submissions, consideration of the main planning issues, and then makes a recommendation on the merits of the project for further consideration and decision of the Minister for Planning.

3. Assessment Process

3.1 Declarations and Guidelines

Following its declaration on 15 December 2020, Mount Lofty Golf Estate Pty Ltd lodged a formal Development Application on 2 December 2021 with the former Minister for Planning, the Hon Josh Teague MP. The State Planning Commission determined that the assessment would be subject to a Development Report (DR) process with the Guidelines (issues to be considered) released on 31 March 2022 by the Hon Nick Champion, Minister for Planning.

3.2 Consultation on the Development Report (DR)

Public consultation on the DR occurred between 5 July and 16 August 2023.

Copies of the DR and technical attachments were made available at the local office of the Adelaide Hills Council and on the SA Planning Portal. Two public notices were published in the *Adelaide Advertiser* and *Mount Barker Courier* advising of the release of the DR, where to obtain or view a copy of the DR and when the public meetings would be held. These meetings were convened by DTI-PLUS

staff (and attended by the developer and their consultants) and held at the Bridgewater Sports and Social Club on 25 July 2023. A total of approximately forty (40) members of the public attended both meetings, held over a two-hour period in the late afternoon and evening.

3.3 The Relevant Authority

The development was declared prior to the introduction of the Planning and Design Code within the Phase 3 (metropolitan and regional city) areas, such that Regulation 11(3) of the *Planning, Development and Infrastructure (Transitional Provisions) Variation Regulations 2017* has the effect of making the Minister for Planning the decision-maker (rather than the Governor) for major development applications declared under the *Development Act 1993* where the Planning and Design Code has commenced prior to a decision being made. Consequently, the final decision on this proposal will be made by the Minister for Planning (the Minister).

When making a decision, the Minister must have regard to the DR, public, agency and Council submissions, the proponent's response, relevant planning policies of the Code, the Planning Strategy, the *Environment Protection Act 1993* and any other matters that the Minister considers relevant.

3.4 Commonwealth EPBC Act 1999

The proponent undertook a desktop assessment to determine the threatened ecological communities, flora species, and fauna species that potentially occur in the area. Communities and species were evaluated as threatened if they were listed under the National Parks and Wildlife Act 1972 (NPW Act) and/or the EPBC Act.

This analysis considered potential impacts to Matters of National Environmental Significance (MNES) under the EPBC Act which are 'known or likely' to occur in the Project include:

- One wetland of international importance
- Two Threatened Ecological Communities
- 13 Threatened flora species
- 13 Threatened fauna species

Key mitigation actions recommended to be employed include

- Avoidance – Project has implemented design changes and realignments to avoid impacts to native areas of vegetation.
- Minimise – Project design has minimised impacts via siting the development on the footprint of existing infrastructure.
- Restore – Project seeks to provide rehabilitation in key areas that are currently infested with exotic vegetation.

Succession Ecology (for the proponent) concluded in their self-assessment that the development (taken together with proposed mitigation options) was **unlikely** that there was any "real chance or possibility" for the Proposed Action to cause a Significant Impact to any Matter of National Environmental Significance. No referral was made to the Commonwealth.

4. The Assessment Report (AR)

This Assessment Report (AR) contains an assessment of the environmental, social and economic impacts of the proposal by Mount Lofty Golf Estate Pty Ltd. The AR takes into consideration the requirements determined under the *Development Act 1993*, including an assessment of the proposal as presented in the DR, community, Council and agency comments, and proponent's response.

The updated DR (including appendices) and public submissions are available at:
https://plan.sa.gov.au/state_snapshot/development_activity/major_projects

The AR does not include an assessment of any elements of the proposal against the provisions of the Building Rules under the *Development Act 1993*. Further assessment of the elements of the proposed development against these rules will be required should an approval be issued.

The proponent's response, included in an updated DR, forms part of the finalised proposal.

5. Proposal

5.1 Detailed Proposal

The proposal is for tourist accommodation, ancillary function rooms, bar, restaurant, gymnasium and upgrade to the golf course and for associated club facilities. More specifically the proposal comprises the following:

- Construction of a 3-5 level tourist accommodation building comprising a total of 88 tourist accommodation rooms (being 56 units, 15 two-bedroom serviced apartments, 15 three-bedroom serviced apartments and 2 penthouse serviced apartments).
- Function room, restaurant and external terrace, sports bar, gallery and cafe and wellness centre.
- Adaptive reuse of the Local Heritage Perfumery building as a retail, cafe and multipurpose function space.
- Golf course facilities building - 2-5 level building comprising function facilities, cart storage and clubhouse, pro-shop, administration areas, gymnasium and change rooms.
- Back of house, plant storage and maintenance areas.
- Retention of the 18-hole golf course with alterations to holes 17 and 18.
- A total of 257 car parking spaces, including:
 - 200 formalised car parking spaces and a porte cochère (set-down/pick-up) facility at the tourist accommodation and golf club facilities building (accessed via Golflinks Road);
 - 20 spaces adjacent to the Perfumery Building accessible from Old Carey Gully Road; and
 - 37 spaces for staff only adjacent to the circulation road connecting from Old Carey Gully Road with further informal parking opportunities within the site.
- An upgrade to Golflinks Road, subject to agreement by the Adelaide Hills Council.
- Subdivision of the land (1 into 3) allotments to formalise the areas for tourist accommodation, golf course facilities building and balance of the site for leasing purposes. This forms a related application under DA 473/D024/23 in EDALA.
- Stormwater detention basin, creek and lake restoration activities including planting native plants in dedicated beds, erosion control works and creek crossings.
- Construction of entry wall and new entry signage at the existing Golflinks Road entry.
- New dedicated walking trail adjacent Golflinks Road on Golf Course land.



Figure 1: Site Plan (Source: URPS)

5.2 Amendments

In response to the public and agency consultation process for the DR the Proponent amended their proposal, which included the following changes:

- Removal of 17 accommodation pods and 1 service Pod, that previously were proposed to the west of the main Tourist Accommodation and Golf Club Facilities buildings.
- A reduction in the amount of native vegetation impacted (reduced from 1.716 hectares (ha) and 151 scattered trees to 0.431ha and seven scattered trees). This equates to a reduction in the amount of native vegetation impacted of almost 1 ha and a 95% reduction in the amount of impacted scattered trees.
- A reduction in the Significant Environmental Benefit (SEB) Offset payment to account for the reduction in native vegetation proposed to be impacted.
- Reconfiguration of Perfumery Gardens and Orchard to retain additional trees.
- Additional detail on the roof plan (confirmation of solar panels), details of materials and finishes.
- Additional details regarding externally lit areas, together with night-time imagery of the proposal.
- Relocation of vehicle access points and additional car parking for staff, now accessible from Old Carey Gully Road, to reduce forecast daily traffic movements on Golflinks Road.
- A new dedicated walking trail adjacent Golflinks Road to increase pedestrian safety and separate cars from pedestrians.
- An upgrade to Golflinks Road, subject to the approval of Adelaide Hills Council.

- Changes to the cladding material for the eastern façade of the car park building (vertically proportioned panels and perforated metal cladding) to better reflect the west façade and a change of materiality to the car parking levels from vertical fluted precast concrete elements to timber laminate.
- An increase to the landscape area at the central arrival space with reduced landscape planters within the pedestrian concourse.

5.3 Proposed Staging

The proponent proposes to construct the development in the following stages:

Stage 1	Stage 2	Stage 3
<ul style="list-style-type: none"> • Upgrade access and road from Old Carey Gully Road • Provide new parking for adjacent to perfumery • Demolition of existing golf club and accommodation 	<ul style="list-style-type: none"> • Site preparation • Construction of tourist accommodation/new buildings • Existing access to be used for construction only • Holes 1 and 2 to be used for construction hubs / parking etc. 	<ul style="list-style-type: none"> • Construct new function pavilion and refurbish perfumery. • Upgrade / refurbish golf course

Figure 2: Staging Sequence (Source: URPS).

5.4 Pre-lodgement Process

The Proponent engaged in the pre-lodgment process in 2021, with one pre-lodgement panel (PLP) session and three Design Review panel sessions. The development significantly evolved throughout this process, including the relocation of pods from a high bushfire area to a less bushfire prone area (noting this component has now been removed from the development) and significant design development of the main tourist accommodation building and associated carparking and servicing. The design evolution included a reduction in the bulk and scale and material changes to result in a terraced building form that is more organic in form and sympathetic with the landscape. Government agencies provided advice as part of the PLP process.

6. Land Use and Tenure

6.1 Existing Land Uses

The Mount George Conservation Park adjoins the project area to the east and south, whilst Golflinks Road separates a largely residential area to the south-west. To the north (and separated by Old Carey Gully Road) are scattered dwellings on larger, rural-living type allotments (where rural activities occur).

6.2 Land Tenure

The subject land is freely held by the landowner/developer, noting that an unmade road reserve extends into the site from Old Carey Gully Road from the north.

6.3 Open Space Proclamation

The golf course land is subject to an Open Space Proclamation made on 10 July 1975 by the Governor of South Australia. A proclamation made under s.61 of the former *Planning and*

Development Act 1967 (which remains in force under subsequent transitional provisions) provides that the Governor, pursuant to 61(2), can on application of the owner of the land, revoke or vary the existing proclamation.

The main purpose of an Open Space Proclamation was to protect privately held open space from being further subdivided for urban development. In this instance, the Open Space proclamation remains in force as if the *Planning Act 1982* had not been repealed (and the Planning Act 1982 continues to apply).

Whilst the proponent has proposed a division of the land (essentially to separate off the hotel and functional elements from the golf course) as part of the assessment, this does not constrain the Minister from making a decision on this aspect.

However, the land cannot be divided (in terms of a final plan deposited and new titles issues) unless and until the current proclamation has been varied and/or revoked. It remains the landowner's responsibility to seek a revocation from the Minister.

In any event, the subject land is also within the Environment Food Production Area (EFPA), and as such further subdivision comprising new allotments for residential purposes is prohibited by the PDI Act (which can only be changed via an amendment that would have to pass both Houses of State Parliament to reflect an updated GRO plan that defines the EFPA).

6.4 Impacts on existing land uses and activities

The DR has considered likely impacts on existing land uses, owners and residents adjacent to the proposed redevelopment area. The majority of these impacts are related to short-term construction impacts and can be appropriately managed under various construction management plans. These impacts, subject to appropriate remediation measures, will be short term.

A direct community impact may be experienced by those people who live or work near the Mount Lofty Golf Estate. This primarily comprises residents of Golflinks Road, particularly those who reside near the boundary of the Golf Estate and those close to the intersection with Golflinks Road.

Potential impacts to this community relate to increased traffic creating both disturbance, noise and safety concerns, additional operational noise, impacts from light spill, visual impacts from new buildings, increased demand on infrastructure and impact on the natural environment (including impacts to fauna and flora).

The wider Adelaide Hills community are more likely to experience economic benefits from the creation of employment and facilities in the area. The upgrade to the Local Heritage place will also result in a positive impact for the broader community.

7. Physical Environment

The DR provides a comprehensive review and analysis of the physical and receiving environment for the Mount Lofty Golf Course and Resort project via a range of investigations, based on existing scientific literature, environmental datasets, and field observations.

7.1 Description of the existing environment

Subject site

The site is located at 35 Golflinks Road, Stirling and operates as an 18-hole golf course (known as the Stirling Golf Club). It is located approximately 20km southeast of the Adelaide CBD in the Piccadilly Valley of the Adelaide Hills and 2.5km from the Stirling township. It has frontages to Old Carey Gulley Road to the northwest, Golflinks Road to the southwest and sits adjacent to the Mount George Conservation Park, with its largely inaccessible steep bushland being located to the east and south.

The land is formally described as:

Allotment	Plan	Title	Road	Council
53	DP 59212	CT 5891/ 805	Golflinks Road	Adelaide Hills

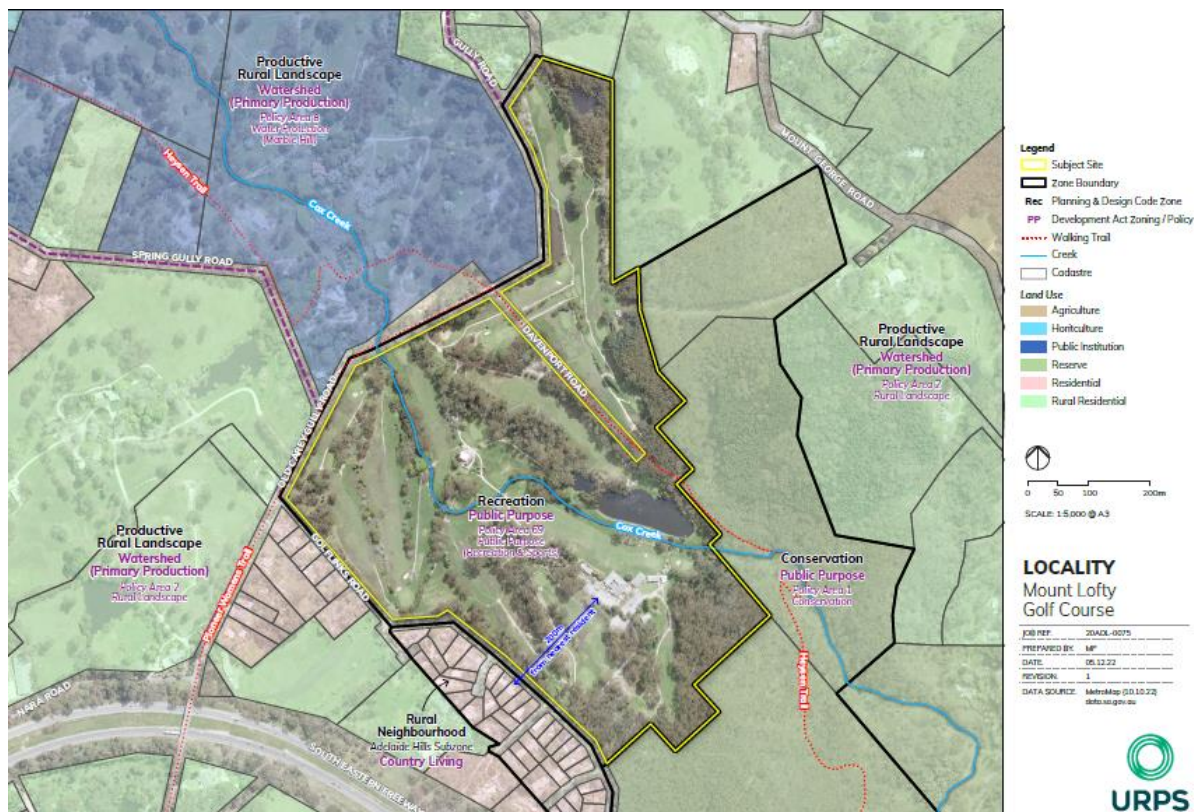


Figure 3: Locality Plan (Source URPS)

The site has the following key characteristics:

- Is approximately 39.9ha in area, undulating and irregular in shape.
- It is located in a picturesque setting (both the subject land and the broader locality).
- It is well vegetated with significant native vegetation and native fauna and flora on the site and surrounding locality.
- The site contains an existing 18-hole golf course and associated members facilities, gymnasium, bars and function rooms supported by a commercial kitchen. The facility includes 5 motel accommodation rooms. The operators of the Stirling Golf course hosted functions and weddings (for up to 300 guests) and well as regular events.
- There are currently 65 formal car parking spaces on the site, with informal parking also available.
- Cox Creek runs through the site.

- A dam is located near the 18th hole.
- There are two main access points to the site, the primary being via Golflinks Road and the secondary is via Old Carey Gully Road.
- The Heysen Trail traverses the site to the north, running in a north easterly – south westerly direction.
- The site contains an easement for Davenport Road which is an unsealed service track that runs from Old Carey Gully Road to Mount George Conservation Park (running parallel and adjacent the Heysen Trail). Unsealed roads also come off Davenport Road, which provide access for vehicles, golf buggies and pedestrians to the perfumery cottage and the clubhouse building.
- The site contains a local heritage place (previously Mount Lofty Flower Farm and Scent Factory, established in 1889). This is currently used for storage and is in poor condition.



Figure 4: Existing Clubhouse Budlings (Source: URPS)



Figure 5: Existing Perfumery Local Heritage Place (Source: URPS)

Locality

The site is bound by Golflinks Road to the north, Old Carey Gully Road to the west and Mount George Conservation Park to the east. The general locality is hilly terrain with scenic and well

vegetated landscapes and contains several vineyards and orchards. It is a significant tourist destination and residential area.

The roads through the Adelaide hills are generally windy and narrow. Golflinks Road, a local no through road, is no exception. According to the CIRQA Traffic Report the road has a capacity of 1400 vehicles. Residential properties are located on the southern side of Golflinks Road, who face the golf course and enjoy a natural outlook. Their only vehicle access is via Golflinks Road.

Old Carey Gully Road is a busy local, council-maintained road, providing access to a number of more minor roads and dwellings. The Scouts Woodhouse Adventure Park, a large site which is used for a variety of large-scale adventure activities and group camping is located immediately north west of the site. The Mount Lofty Gardens is located nearby in the Stirling area.

Site Selection

The proponent investigated three potential sites for the location of the new facility within the golf course site. A matrix was used to assess the suitability of each site to inform the site location. Refer to the DR for details of these locations. The existing site was deemed as the most suitable, when assessed against the criteria below.

- topography
- separation from Mount George Conservation Park
- availability and proximity to services
- minimising visual impacts to residents on Golflinks Road
- minimising impacts to the function of the 18-hole Golf Course
- minimising the need for removal of trees and vegetation - advice sought from the Native Vegetation Council (NVC)
- minimising cut and fill
- minimising impacts to people and property in the event of a bushfire – advice sought from the Country Fire Service (CFS)

7.2 Mount Lofty Ranges Watershed

The Mount Lofty Ranges Watershed encompasses an area of approximately 1640 km² and includes Adelaide's existing and possible future water supply catchments. On average, 60% of Adelaide's existing mains water supply requirements are sourced from the watershed. As the EPA notes:

"Ninety percent of the watershed is privately owned and will always be subject to multiple uses including urban areas, rural townships, horticulture, viticulture, market gardens, forestry, dairy farming and grazing. Pressure continues to intensify development within the watershed; this will further concentrate the water quality problems, which are usually diffuse in nature and emanate from a range of source."

For new development, pollution sources must be minimised (both from a project and cumulative perspective), to maintain water quality, particularly from nutrient contamination, sediment loads and agricultural uses (faecal and pesticide contamination). The EPA's Water Quality policies seek to ensure development adopts processes consistent with the waste management hierarchy, minimises environmental harm and maintains the environmental values of receiving environments. For this development, the primary considerations will be the management of overland flows, the capture,

treatment and re-use (where possible) of stormwater and connection to an approved waste management system and network (to ensure appropriate treatment and disposal).

7.3 Other watercourses

The site is located within the Onkaparinga Catchment of the Western Mt Lofty Ranges Prescribed Water Resources Area. The stormwater detention basin is a water affecting activity under the *Landscape South Australia Act 2019*.

Erosion control work within a watercourse requires a permit under the Landscapes South Australia Act 2019 obtained from the Hills & Fleurieu landscape Board. It is anticipated that the design of the basin complies with the requirements set out in the Western Mt Lofty Ranges Water Allocation Plan – water storage and diversion structures section specifically.

From the FMG report, the catchment area of Cox Creek upstream of the site exit point was estimated to be approximately 2,000ha. This catchment area includes sections of Summertown, Carey Gully, Crafers and Piccadilly and includes residential, primary production and public purpose land use areas. The locality has an average annual rainfall of 1068mm (Piccadilly Station).

The proponent has undertaken a site-wide approach to restoring creeks and waterways to assist in improving the site's overall ecology and appearance. The approach includes restoration to creek beds with revegetation along creek beds, with designated crossovers for walkers and golf buggies; improvement to existing lakes with planting to embankments and a small lookout deck integrated along the connection to the Heysen Trail and a stormwater basin for water quality improvement.

7.4 Impacts on the physical environment

Potential impacts from the construction of the development to the physical environment include modification to the existing landform, from excavation, filling and compaction, and soil erosion or sedimentation from the clearance of existing vegetation. These impacts can be managed through appropriate soil and drainage management plans during construction.

The subject land is within a sensitive watershed catchment area, and water management practices need to be sustainable and environmentally responsible. FMG prepared an Integrated Waste Management Plan which outlines the integrated strategy to managing water resources.

Cox Creek flows through the site in a south easterly direction. It is located to the north and north-east of the existing clubhouse and the proposed new hotel buildings. The Creek is near a constructed dam which harvests runoff from the northern side of Cox Creek. This is used for irrigation of the golf course. No works or modifications are proposed to the existing dam or golf course irrigation methods.

As outlined by FMG, Cox Creek is at the low point of the Golf Course with smaller tributaries flowing into it. All runoff from the existing buildings flow into the Creek, through a series of formal and informal flow paths. Drainage for the minor system consists of roof drainage, stormwater inlet pits and pipes and the condition of this infrastructure is considered likely to beyond its useful life. South of the existing buildings, there is an upstream catchment of approximately 6ha which is informally channelled around the east and west of the clubhouse buildings.

No existing contamination sources have been identified during the initial desktop and ground investigations. Wastewater, fuels and other chemicals can be appropriately managed during construction, in accordance with existing health regulations and environmental regulations.

7.5 Other Legislation

The development must be undertaken in accordance with a range of other legislative requirements and environmental standards that seek to protect, conserve and maintain the natural environment under the *Landscape South Australia Act 2019*, *Environment Protection Act 1993*, (including companion water quality, site contamination and noise policies), and national standards relating to fuel and chemical storage. Reference to these requirements in the DR, will also be carried across to various management plans.

8. Public Consultation

A total of 177 public submissions were received during the six (6) week consultation period from Wednesday 5 July 2023 until Wednesday 16 August 2023.

The consultation process included the publication of two newspaper notices inviting public comments, two public meetings held at the Bridgewater Sports & Social Club on 25 July 2023 and the proponent's documentation available on the SA Planning Portal.

In broad terms, the public submissions can be summarized as supportive (17%), supportive with concerns (14%), opposed (65%) and neutral/no definitive position expressed (4%).

The key matters raised in the submissions received have been considered against the assessment guidelines in Appendix 2, however can be summarised as follows (being more than 10 submissions made in respect to these matters):

- Condition, safety and capacity of Golflinks Road and impacts on adjoining residents
- Vegetation clearance and tree removals
- Fauna and biodiversity impacts
- Scale, height, footprint, density of development and impacts on visual amenity
- Impacts on water catchment, diminution of water quality
- Bushfire hazard evacuation risk
- Loss of local amenity, open space and landscape character
- Light overspill, nuisance impacts on nocturnal species
- Subdivision of land, and limits from open space proclamation
- Fauna displacement, increased risk of animal strike on roads
- Noise impacts – increase in functions, events, additional cars
- Capacity of local infrastructure to cope with new development
- Impacts of Heysen Trail, Mount George Conservation Park

Further comments were made in respect to the adequacy of the consultation process and documentation, construction impacts, effect on property values, aboriginal cultural heritage, greenhouse gas emissions, spread of noxious weeds and developer interests.

Supportive comments related to the provision of additional accommodation options in the Adelaide Hills region, supporting economic growth and employment, makes improvements to the golf course and the design outcome makes a positive contribution.

The proponent prepared an update to its Development Report to address these matters.

9. Additional Information

On 2 February 2025, URPS (on behalf of the proponent provided a formal response to the matters raised in the public submissions, agency advice and council comments. URPS noted the number of submissions received and issues raised, including a summary of community engagement to date.

A number of changes were proposed to the development to further minimise and/or address impacts on native vegetation and trafficability from the lodged proposal. The updated Development Report outlined a number of changes (and supported by amended documentation) relating to the removal of the accommodation pods, upgrade to local roads and civil infrastructure, and changes to parking and access arrangements to the golf course site for visitors, staff and emergency vehicles.

The updates to the Development Report are considered to have adequately addressed the issues raised by public, agency and council submissions received during the notification period. Final details can be provided in the form of design drawings and management plans as conditions of approval.

10. Agency Advice

Eleven state agencies were consulted on the Development Report (and its subsequent update), and where relevant, the most recent advice has been summarised below (noting that issues raised from the DR may have been subsequently addressed in the response):

10.1 Environment Protection Authority (EPA)

No objection, subject to further information being provided. The EPA considered noise, stormwater and wastewater management in its updated advice.

Noise: Whilst some concerns were initially raised with the noise methodology adopted in the BESTEC report, the EPA considers that the removal of accommodation pods reduces potential impacts on nearby residential properties and is satisfactory. The EPA advises the provided noise assessment should be updated to reference the *Environment Protection (Commercial and Industrial Noise) Policy 2023* which has replaced the referenced Environment Protection (Noise) Policy 2007. A condition relating to the adoption of the building design and construction and equipment recommendations contained in the noise assessment report is recommended.

Wastewater: The proponent's engineer FMG has received advice from both the Adelaide Hills Council and SA Water noting that wastewater is proposed to be managed in a number of ways. The on-site collection of wastewater from the development will be pumped to Council's Golflinks Road CWMS pump station 2 (which is proposed to be upgraded by the Proponent) before being discharged through a network of pipes to Heathfield Waste treatment Plant. Both SA Water and the Adelaide Hills Council have provided their in-principal support for the management of wastewater, which will be subject to a trade waste discharge permit. The EPA is satisfied that wastewater would be appropriately managed from the site. Conditions relating to the appropriate management of solid waste removal is advised to be included on any approval.

Stormwater Management: A final detail Stormwater Management Plan (SMP) confirming the mechanisms to control water quality runoff from the site would still be required. The EPA supports this approach and reiterates that the SMP plan should include MUSIC and DRAINS modelling to ensure the proposed development would not have an adverse impact on water quality draining from the site.

10.2 Native Vegetation Council (NVC)

No objection. The NVC noted the proposed development has been amended which significantly reduces the area of native vegetation clearance previously proposed. The Council provided updated comments in respect to the on-site works, and noted the potential impacts to roadside vegetation along Golflinks Road. A further report will be provided to the Council in respect to the road works to determine the SEB for one affected tree. The clearance of three Manna Gums remains a concern, noting their rarity and biodiversity value. Their retention is recommended. Any increase in local foot traffic into existing reserves will also need to be carefully monitored.

10.3 Aboriginal Affairs and Reconciliation: Attorney-General Department (AGD)

No objection, although concerns were raised. On balance, AAR does not consider that the requirements in the Guidelines associated with Aboriginal Heritage have been satisfied.

AAR restated their initial advice on the importance of undertaking meaningful consultation with the Kurna Yerta Aboriginal Corporation (KYAC) and/or any other Traditional Owners or group regarding any unrecorded Aboriginal heritage sites, objects and remains within the Project area and to understand the area's risk profile in a heritage context as well as to understand other culturally sensitive landforms and areas that may be affected by the Project.

The proponent prepared a Cultural Heritage Management Plan (CHMP) which the AAR notes that this is only a framework and does not adequately set out avoidance and protection measures and was not prepared in consultation with Traditional Owners. AAR advise that engagement with Traditional Owners and their representative bodies is crucial to understanding the extent, location, and nature of Aboriginal heritage protected by the Aboriginal Heritage Act 1988 (SA) (Heritage Act).

AAR identified several inconsistencies in the CHMP and also suggested some changes to the proponent's proposed conditions relating to the implementation of appropriate heritage measures during Project activities.

Whilst not mandated, AAR recommends that the proponent undertakes a heritage survey and this is covered by a recommended condition of approval.

Commentary was made with regard to the Proponents' mitigation control measures. These matters should be clarified with the proponent prior to them undertaking any earthmoving work on the site. Several conditions have been recommended.

10.4 Department for Environment and Water (DEW)

No objection. DEW's initial advice referenced the original clearance requirements but deferred this consideration to the NVC (which subsequently updated their advice to DHUD based on the removal of the accommodation pods). In respect to water licensing, DEW noted that the proposal does not intend to capture or take additional water for licensed purposes, and no groundwater interception or use is anticipated.

The Mount George Conservation Park (MGCP) is immediately adjacent the proposal site. The DR does not explicitly mention how the proponents will manage access to the MGCP should the increased number of guests at the Resort also result in an increase in visitors to the park. DEW recommended that appropriate wayfinding be used to ensure that guests wanting to visit the Park are directed to this formal path, rather than developing a proliferation of informal accesses points to the Park that could result in biodiversity or infrastructure dam.

Fuel management is able to occur within the boundaries of the development site and given the golf course use and location of the tourism accommodation, no fuel management reduction is required within the boundaries of the MGCP.

DEW acknowledged that the new facility is likely to provide additional water for firefighting which could benefit fire suppression in this area. New, upgraded fire water supplies provided with the development are likely to be better designed and accessible compared to the existing facilities, particularly in the event of mains water pressure dropping during times of demand, like a bushfire.

DEW supports stormwater being retained with the development site so that any increase in runoff as a result of the proposal doesn't enter the catchment and negatively impact water quality and local water ecology.

Existing native habitat in the golf course and adjacent MGCP is significant. Given the reduction in clearance requirements, potential impacts to valuable habitat for native species, including the Nationally Endangered Southern Brown Bandicoot, Chestnut-rumped Heath Wren and Bassian Thrush and locally rare and endemic Pygmy Copperhead Snake, have also been reduced.

Light pollution can disrupt nocturnal behaviour affecting species survival and reproductive success. The lighting design for this proposal should be sympathetic to the needs of native wildlife so that darkness remains across the majority of the site and so that the lighting up of large areas at night is avoided. Any lighting design should also avoid light pollution in the direction of the MGCP.

DEW commended the proponent on the sustainability initiatives proposed in Appendix H - Sustainability Strategy Report, with the project being underpinned by ecologically sustainable design features such as energy and water saving measures, the use of renewable energy generated on site and the application of passive design features.

10.5 Department for Infrastructure and Transport (DIT)

No objection. Additional traffic movements to and from the development will have a negative (albeit slight) impact on the level of service at the Barker Road/Pomona Road/Avenue intersection, but falls short of requiring an upgrade, such that DIT had no requirements.

10.6 Hills and Fleurieu Landscape Board (HFLB)

No objection. The proposed development is located entirely within the surface water catchment of the Onkaparinga River. It is also located entirely within Western Mount Lofty Ranges (WMLR) Water Allocation Plan (WAP) surface water management zone Cox Creek.

The proposed development includes the construction of a stormwater basin for water quality improvement and crossings over Cox Creek. These are Water Affecting Activities under section 104(3) and of the *Landscape South Australia Act 2019*, which would otherwise require a permit were it not for the operation of section 106(1)(e) of that Act.

Discharge from the underground drain, and major storm overland flow will be conveyed into a new detention and water quality improvement stormwater basin located adjacent Cox Creek. Whilst the proposed development is only at concept design phase, it is evident that the intended purpose of the stormwater basin is to maintain pre-development flows and water quality remediation.

The designated 'cross overs' marked on the plans that bridge the Cox Creek must be constructed in accordance with Water Affecting Activities Control Policy and the *Landscape South Australia Act 2019*. This Act requires that the impacts of Water Affecting Activities on the environment and downstream users are appropriately managed on site during the construction phase and the potential for offsite/ downstream impacts are effectively mitigated.

10.7 SA Country Fire Service (SA CFS)

No objection. Bushfire protection advice provided during the pre-lodgement process was incorporated into the final Development Report to the satisfaction of the SA CFS. Final Bushfire Attack Level (BAL) assessments will be required for the hotel complex once vegetation removal and management plans have implemented. For construction requirements and performance provisions, refer to the current National Construction Code and Australian Standard(s) for the relevant provisions applicable to the classification of the building. SA CFS requires final bushfire management plans which can be dealt with through conditions of approval.

10.8 SA Health (Wastewater)

No objection. Formal approval for the wastewater works will be required from SA Health before commencing installation. No concerns were raised with the proposed system, although an application is required to enable a full assessment. The wastewater will then be directed to Adelaide Hills Council's CWMS network (for which their approval is required).

10.9 SA Water Corporation

No objection. SA Water advises that the existing SA Water network capacity can accommodate an increase in wastewater flow rate to 2.6L/s which would accommodate the proposed redevelopment. This will require an upgrade to the Council private pump station to discharge at the rate of 2.6L/s and the installation of emergency storage.

To accept the flows, Council, as the service provider to Stirling Golf Course development, will need to apply to SA Water for a trade waste discharge permit. SA Water does not reserve capacity in the network and as such this capacity assessment is valid for a period of 12 months.

10.10 Government Architect (GA)

No objection, subject to design refinements. The Government Architect (GA) supports the amendments although remains concerned with several aspects of the proposal which are recommended to be reviewed, being:

- *further consideration of the arrival experience in relation to movement and legibility, materiality, seamless integration of landscape and architecture, built form massing, architectural expression, services and extent of car parking*
- *further review of interfaces and opportunities to integrate and merge the landscape into the built form and minimise the impact of an architectural response to the land*
- *detailed consideration of all roofscapes, external materials selection, facade systems and green infrastructure in collaboration with landscape, structural and sustainability consultants to ensure delivery of the design intent*
- *further review of strategies to break down the built form mass and bulk to ensure the effective integration of landscape and architecture.*

The design response – and where improvements have been identified by the Government Architect's advice – are reviewed and assessed in greater detail in the assessment report.

10.11 SA Tourism Commission

No objection. SATC supports the proposal, with additional commentary provided in September 2022 (and referenced in the economic impact section of this report). SATC noted that golf tourism is a growing sector in South Australia and SATC is committed to working with businesses to support new and enhance golf tourism experiences.

11. Council Comments

No objection, subject to resolution of certain matters.

The Adelaide Hills Council were consulted on the draft DR and subsequently provided formal comments on the updated DR (included applicant response). The key matters raised have been summarised below.

The Adelaide Hills Council Assessment Panel considered the development proposal at a meeting held on 9 August 2023, and at this time did not support the development, based upon the scale of the vegetation clearance (particularly to accommodate the POD elements), the existing condition and serviceability of Golflinks Road, the capacity of local infrastructure (particularly sewer systems) and potential impacts to roadside vegetation from infrastructure required to support the development.

The Council then revisited its advice following the provision of additional information.

This focused on three main areas: (a) vegetation impacts from potential/required infrastructure and utility services located in public road reserves; (b) the need for additional design detail in respect to the upgrade of Golflinks Road and Old Carey Gully Road (constituting both shoulder sealing and/or site access upgrades), and (c) the capacity of the local sewer network (both rising main and pump station) to accommodate the new development without impacting local service levels.

It was understood that an Infrastructure Deed would be required between the proponent and Council to implement local road and service upgrades in accordance with their requirements.

Council considered the updated Development Report of 2 February 2025 and provided its final response on 7 March 2025. Council has not objected to the development although advised that additional information would still be needed on a number of matters.

The key matters relate to the following:

- The extent of the proposed alterations/upgrade to Golflinks Road (12.5 Heavy Rigid Vehicles swept paths currently encroach on the median line of Golflinks Road at the intersection with Old Carey Gully Road and do not meet the necessary minimum clearances).

Provision of turn/swept paths for 12.5m buses and 19m articulated vehicles for all intersections, all corners on Golflinks Road and all access points are required, ensuring a minimum clearance of 300mm. Further modifications at the intersection will be required to meet the council's requirements.
- Provision of a revised Stormwater Management Plan replacing stormwater filter baskets with Gross Pollutant Traps.
- Further detail of the pump station – including engineer design calculations and engineering confirmation that the pressure rating for the pumping main pipe to the Council pump station will cope with the increase flow rate and confirmation from SA Water of the acceptance of the pump station.
- The development includes the three (3) trees to be removed in the road reserve and nine (9) other to be pruned, however an Arboricultural Impact Assessment Report has not been provided which addresses each tree individually. Whilst located in the Native Vegetation Overlay the data report by Succession Ecology does not provide sufficient information.
- Council is still seeking a formal written agreement from Mount Lofty Golf Estate Pty Ltd to enter into an Infrastructure Agreement and Land Management Agreement and bear the costs of preparation of these Agreements.

- Council accepted the weed management plan could be provided later and gave in-principle support to the walking trail.

In addition to the above comments, a number of conditions were recommended. Whilst the Council's final response is noted, it is considered that the request for additional information is not fundamental to making a decision on the application and – where necessary - can be incorporated as conditions of approval, subject to the proponent entering into formal Infrastructure Agreement and Land Management Agreement agreements with Council.

12. Need for the Proposal

12.1 Background

The proposed redevelopment of the Stirling Golf Club and its facilities seeks to meet both the needs of current and future members and provide a modern, contemporary accommodation offering and function facilities for both local and interstate visitors, and the community more generally.

As outlined in the DR, the proponent sought advice from the South Australian Tourism Commission (SATC) to determine if there was a need for the proposed development.

Their advice concluded that the development would correspond with three of the six priority areas listed in the South Australian Visitor Economy Sector Plan 2030 (SATC, 2019), namely visitor experience, enhanced capability and blended event offerings (i.e. business and leisure).

The DR further noted that:

“The Adelaide Hills region has relatively few large-scale facilities and the proposed development directly addresses this observed shortfall. A key action of the Sector Plan was to upgrade and refresh the quality of accommodation across South Australia to match consumer expectations and create immersive experiential accommodation options.”

Support for the project was also provided by existing golf club members and Adelaide Hills Tourism. It was acknowledged, however, that a project on this scale would have a range of social, economic and environmental impacts that would need to be carefully considered.

12.2 Project Benefits

The key project benefits are considered to be the redevelopment of an existing golf course and new and upgraded facilities for members and visitors, the provision of new accommodation and serviced apartments within the Stirling area and Adelaide Hills more generally, the adaptive re-use of a local heritage place, environmental improvements to Cox Creek (particularly re-vegetation and weed removal works), improved connectivity to the Heysen Trail and along Golflinks Road, increases in local employment, demand for local goods and services, and a more general and sustained economic contribution to both the regional and state economy from increased economic activity.

13. Assessment of Key Issues

13.1 Design

The proposal has significantly evolved over time due to the engagement with Design Review and consultation of the development. The GA supports the design aspirations and sustainability principles of the project and considers that:

‘the development presents a significant opportunity due to its location and unique landscape setting and has the potential to become a leading precedent for developments of this kind’.

Furthermore, the GA considers that the proponent has a responsibility to deliver an exemplary design outcome which responds to landscape setting, particularly in terms of the visitor arrival experience and the built form’s integration with the landscape setting.

The following outlines some of the key extracts of the proponent’s design intent:

“The built form has an organic appearance, with curved building forms complimenting the dynamic nature of the site’s topography (and) is intentionally split into two for a few reasons. The first to create a unique arrival experience with a larger central courtyard and pedestrian promenade.

The other benefit of the separation is to create clear separation of uses. People staying at the hotel have clear separation from the golf club. These are still linked at the lower ground level to allow for functional management and services of the development

The building also steps back as it gets taller, maintaining a 3-4 storey form as it terraces back towards Golflinks Road with the steep topography. The buildings form nestles into the landscape and topography rather than appear as though it was dropped onto the site.”

In response to public and agency notification of the development a number of design changes were made to the project. The following is a summary of the main design changes, as per the updated DR of 2 February 2025:

- removal of ‘accommodation pods’ and hotel creche from the project scope, resulting in a significant reduction in the amount of native vegetation removal.
- relocation of vehicle access points (staff, hotel and servicing).
- increased landscape scope to the central arrival space and reduced landscape planters within the pedestrian concourse.
- provision of the roof plan (confirmation of solar panels and increased area for screened rooftop services).
- inclusion of vertically proportioned panels and perforated metal cladding to the east car park facade (to reflect the west facade).
- change of materiality to the car parking levels from vertical fluted precast concrete elements to timber laminate.
- façade changes to provide more clearance to the main driveway to allow for additional tree planting and further landscaping.

EARLIER DESIGN ITERATIONS:**CURRENT DESIGN:**

Figure 6: Earlier and Current Design iterations (Source: R Architecture/URPS)

Whilst providing general support for the project and the amendments made to the project the GA considers that further consideration is required for certain elements of the proposal, as outlined in their advice. This advice has been taken into account in the assessment below.

13.1.1 Facilities Building and Hotel Building

Site area

The proposed Functions and Hotel buildings are to be located on an existing and modified site, with the built form terracing back into the hill towards to south. This responds to the steep topography of the land, minimising cut and fill and visual intrusion beyond the site, especially from the south. The site is also well separated from the MGCP and the high bushfire areas. The site location is sympathetic with the topography of the land and constraints of the site.

Built Form and Material selection

These buildings comprise two structures of 3-5 building levels, connected at the lower ground level and separated at the upper levels by a central courtyard and pedestrian promenade. This is a practical design, separating the two buildings whilst also providing a connection between them and allowing for management and provision of services across the development.

This design provides visual relief of the building mass with a glimpse of the landscape between the two buildings. Once inside the building the full expanse of the vista is revealed. It is noted that the two penthouse suites are located on the top floor of the Functions Building.

The proposed materials incorporate a large expanse of vertical glazing to the northern façade, exposed concrete slab extensions and soffits, timber cladding infill elements, metal fin balustrades and raised black metal planters with climbing plants.

The Function Building and Hotel Building are complementary in design, bulk, scale and materiality. The car parking component of the Function Building comprises 2 levels and the building materials have been amended from concrete and metal mesh to timber fins with open sections in between.

Other façade changes were made to provide more clearance to the main driveway to allow for additional tree planting and further landscaping. The proposed materials will weather over time, although the development will also rely on softening of the built form through landscaping. Sympathetic and integrated landscaping is therefore a critical element of the application.



Figure 7: Material Selection (Source URPS)

Visual Impact beyond the site

The Architectural Statement prepared by RArchitecture for the proponent considers the proposal from a number of vantage points (from each facade). The aim is to assess the perceived visual impact of the development on the surrounding locality, including its cumulative impact.

The proponent identified that the highest visual impacts would occur from views 5 and 6 (see below) which are internal to the site, from the north looking south (Heyesen Trail and north of the dam). They took an average of the perceived visual impacts and determined that the overall visual impact of the development is *minimal*. Refer to the Architectural Statement for detail.

VIEW 05



VIEW 06



VIEW 02



Figure 8: Viewpoints 05,06 and 02 to the main development: *Note Viewpoint 02 shows the development from the closest resident to the south – being approximately 130m away from the site (Source: URPS).*

The proposed development, by its very nature is of a bulk and scale that will dominate the immediate locality. Design measures have been incorporated to mitigate the impacts of the long-term view of the structures.

13.1.2 Car Park structure and visitor experience

The car park building has dominant design features which will impact on the uninterrupted arrival experience for visitors. In addition, the roundabout located at the entrance will reduce the pedestrian permeability through the site. As a result of GA advice, the proponent has amended the proposal to improve the visitor arrival experience. This includes reconsideration of the site wide planning to provide greater separation between vehicles and pedestrian and improved walkable connections within the main hotel, facilities, golf precinct. More specifically the following amendments were made:

- Relocation of the hotel carpark entry further away from the main entry, concealed behind a new landscaped mound, so as not to be visible from the arrival area
- Relocation of the entry door for guests and golfclub patrons at the lower level further away from public promenade. Services and staff carpark are now located on the upper deck.
- The roof terrace has been split into a lower terrace which now overlooks the arrival promenade and has direct access from inside the Facilities Building as well as pedestrian access from tee box 1. The upper terrace is designed for more intimate gatherings and functions overlooking fairway 1 and visual connection to tree canopy to south.
- The upper terrace has now shifted away from arrival to reduce overall building mass and scale-down the built form. In addition to this the detail for lower terrace balustrade has been redesigned to reduce overall wall height.
- Internal spaces have been re-arranged to be more functional with an activated façade.

Notwithstanding the amendments made, the GA continues to have reservations about the arrival experience in relation to *movement and legibility, materiality, seamless integration of landscape and architecture, built form massing, architectural expression, services and extent of car parking.*

Whilst it is acknowledged that the carpark structure is a dominant feature on arrival to the site with regards to pedestrian movements, materiality, massing, architectural expression and servicing it is considered acceptable in the circumstances. This is in part based on the overall contribution of the development to the wider locality for increased tourism opportunities; the successful operation of the development; the requirements for adequate car parking and servicing areas for the development through servicing; and taking into consideration the other constraints of the site which limit alternative locations for the car park. The proponent claims that this is the most suitable location that allows for servicing to the building and proximity to the facilities.

The impacts of the arrival experience are mitigated by locating one level of parking in the lower level under the Hotel Building and for changes to the selection of materials, relocation of entry doors, additional landscaping and screening and greater activation on terrace levels. These are considered positive changes made in the DR. In addition, the development has a reasonable separation from public roads so that the car park building will not be overtly visible from outside of the site and visual impacts of this building are predominantly within the development site. Whilst the GA's concerns are noted the quality of the visitor arrival experience is not considered to be fatal to the overall success of the development.

In summary, the overall design of the development is of a reasonably high design quality, although it is acknowledged that this could be further refined through design development, including final material selection, landscaping and confirmation of ESD features. In addition, to minimise the impact of the building on the land it is recommended that pedestrian circulation, interfaces and

opportunities to integrate and merge the landscape into the building be further refined and included as a condition of approval.

13.1.3 Environmentally Sustainable Design (ESD)

Planning policy seeks to promote development that incorporates sustainability features that limit the use of natural resources and minimise greenhouse gas emissions to the wider environment.

In considering the environmental performance and ecologically sustainable development (ESD) principles incorporated into the overall development, the proponent commissioned the *Mount Lofty Golf Estate: Sustainability Strategy Report* by D².

The sustainability strategy adopted seeks to accord with a five-star Greenstar certification, incorporate passive design features, minimise carbon and energy inputs, reduce water consumptions and maximise the use of passive ventilation/natural daylight in the buildings' design.

The specific ESD outcomes of the project have been designed to exceed the NCC / BCA 2019 deemed-to-satisfy requirements, with preliminary modelling indicating that the development's energy consumption will be 25% lower, and its carbon emissions from energy use will be 18% lower.

The development will be all-electric and will benefit from a wider energy transition in South Australia to renewables as no fossil fuels (natural gas) will be used for heating, cooling, or hot water services. A solar photovoltaic rooftop system will further reduce the annual electricity demand by 20%.

The proponent has committed to a Zero Carbon Action plan with an aim towards net zero emissions during the operation of the development (such as the use of battery powered machinery).

All hotel suites and public facilities will have access to natural daylight and ventilation in accordance with Greenstar standards. A 10% reduction in potable water use, whilst a 50kL storage tank will be used to collect roof-captures stormwater, *"which will contribute 13% of the buildings' total annual water demands, or 25% of the buildings' non-potable water demands"*.

Passive design features include a beneficial orientation (where possible), external shading, energy performance glazing and façade elements, air leakage minimisation / pressure testing standard, passive cooling measures (green roof, planters etc), and lighter coloured roof finishes.

Construction practices will consider the embodied carbon content of infrastructure and building materials, with a preference for Refrigerants with low Global Warming Potential (GWP) ratings, the use of locally sourced materials and the implementation of Environmental Management Plan.

Construction waste will be minimised through standardisation and pre-fabrication (where possible), separated waste streams and storage, and the adoption of an Operational Waste Management Plan will be developed in accordance with Green Building Council of Australia guidelines.

The development also seeks to provide social sustainability features including a wellness centre and gym, shared facilities and the rehabilitation and reuse of a local heritage place, being an accessible gathering point for the local community and visitors.

In reviewing these measures, including the proponent's Architectural statement the Government Architect noted the following specific measures:

- *Northerly orientation for the building for passive solar gain to capture winter sun with external shade elements and balconies used to provide shade protection from the summer sun, along with specific tailored glazing specifications reducing the reliance on active climate control techniques*
- *Facade shading elements have been selected by energy performance modelling and computer simulation techniques.*
- *A tailored approach to façade glazing for each building.*
- *Air leakage pressure testing will be conducted on the external facade to ensure ideal air leakage rates, significantly reducing air conditioning energy consumption.*
- *Provision of greening and landscaping including a green roof, facade planters and landscaping to provide passive cooling*
- *An electrified energy system with no reliance on fossil fuels or natural gas*
- *Installation of 300 solar voltaic panels on the rooftop at 300W per panel, providing 20% of the total energy requirement of the building*
- *The inclusion of a 5 star Green Star As-Built certification.*
- *Additional sustainable practices will be incorporated in the hiring of local labour and materials as well as selecting recycled materials and highly efficient water and electrical fittings.*

The Government Architect supports the ESD initiatives proposed, although it is noted that careful consideration of the rooftops, external materials selection, facade systems and green infrastructure is required.

13.1.4 Adapted reuse of the Local Heritage building

The local heritage perfumery building is currently used for site maintenance and workshop and is serviced with water and power. This building will be refurbished as a function space, such as weddings and events. The intent is to restore the heritage fabric to its original state, wherever possible.

A new modern pavilion structure is proposed to be constructed adjacent to the local heritage building to expand function area. The pavilion building will be constructed mainly of glass and metal in contrast to the stone heritage building. A scent garden, tree orchard and outdoor seating are proposed to reinforce historical ties to the use of the Perfumery building.

The adaptive reuse of the heritage place is supported and is encouraged by the SPP and Code provisions. It will positively contribute to the upgrade of the Golf Course and provide for a bespoke event space while capitalising on the sites European heritage.

13.1.5 Lighting Impacts

In response to public notification of the development the proponent undertook a visual lighting assessment, prepared by Lucid Consulting Australia. This advice considers the relevant carpark lighting standards, obtrusive lighting requirements and potential impact to native wildlife and refers to the National Light Pollution Guideline for Wildlife.

An overall lighting design sympathetic to the needs of native wildlife is required so as not to disrupt important habitat nor impact on critical behaviors such as foraging, reproduction, and dispersal. The proponent proposes to maintain darkness across the majority of the site and minimise illumination

of large areas for extended periods. The following strategies are proposed to minimise illumination impacts on wildlife:

- avoidance of light pollution in the direction of the Mount George Conservation Park.
- lighting for outdoor parking areas is to be the lowest level of lighting.
- minor lighting is proposed for staff movement from the car parking area off Old Carey Gully Road to the main facility (being less than the minimum standard recommended) and instead the implementation of operational procedures to ensure staff safety.
- adaptive lighting controls in pedestrian areas with detection sensors /dimming.
- lower intensity / output lighting will be employed in lieu of high output area lighting and where possible located in close proximity to ground level such as long vehicle movement areas.
- external lighting will be warmer lighting temperatures (below 3000K) with low amounts of short wavelength (blue) light content.
- lighting will be placed with consideration for external reflective building elements to avoid inadvertent transmission through reflection.

Given these design and operational measures, the retention of existing vegetation and the distance (and elevation change from the top of Golflinks Road to the main hotel development), light overspill impacts are considered to have been appropriately considered.

13.1.6 Landscaping

A Landscape Masterplan was prepared by Oxigen. The landscape strategy aims to soften the appearance of the development with the integration of landscape with the built form.

This includes lawned terraces, balcony planning, balustrade planting, rooftop 'green roof' sedum gardens and entry and roadside planting. The central arrival space and Functions Building connect to the lower lawned terrace through two open stairs. Much of the development site is significantly modified and has the opportunity to enhance the amenity through the introduction of landscaping.

A site-wide strategy is proposed in relation to the restoration of the creeks, waterways and stormwater detention basin. Designated crossovers are proposed for walkers and buggies and integration with the Heyesen Trail, including a small lookout deck. Existing lakes will be improved with planting to the embankments.

The Hills and Fleurieu Landscape Board was consulted and raised no objection to the proposal, advising that they have a regulatory role in assessing and permitting water affecting activity permits. Under the *Landscapes South Australia Act 2019* a water affecting activity permit is required for the proposed stormwater detention basin, creek and lake restoration activities including planting natives in the beds, erosion control works and creek crossings.

The water affecting activities are expected to have a positive outcome that comply with the Hills and Fleurieu Water Affecting Activity Control Policy and Western Mt Lofty Ranges Water Allocation Plan.

The GA supports the landscape principles with the retention of native vegetation, views to MGCP, integration of landscape and built form and restoration of Cox Creek to a natural landscape environment. The proposal incorporates a large rooftop expanse creating the opportunity for landscape and architecture to contribute equally to the success of the project. The GA considers careful consideration of all roofscapes and landscape connections and interfaces with the built form

to achieve an immersive landscape environment with universal access. Further landscape details can be provided during design development of the project and form a condition of approval.

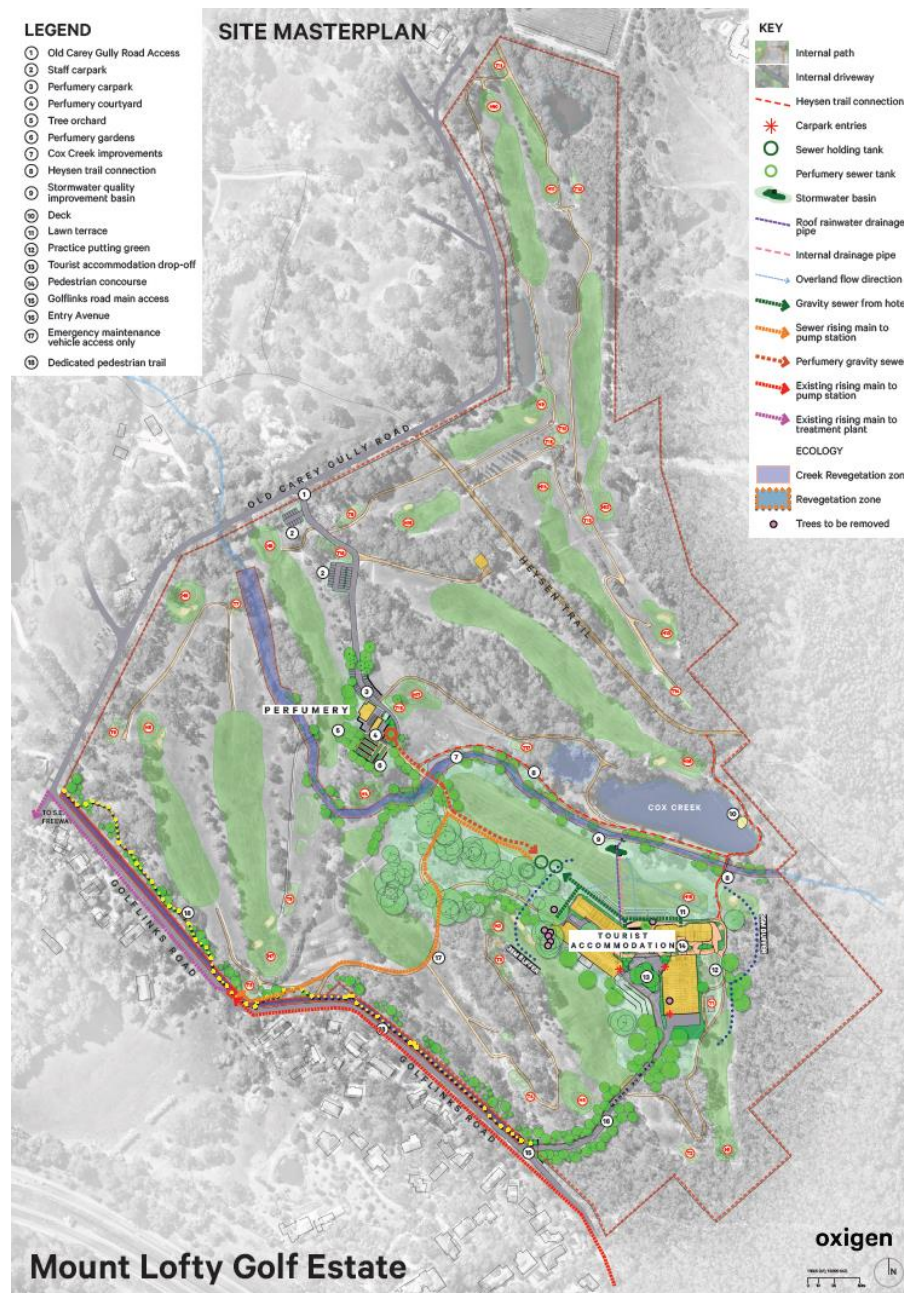


Figure 9: Landscape Masterplan (Source URPS)

13.2 Flora and Fauna

The DR provides detailed descriptions of the distribution, abundance, condition and conservation values of vegetation and fauna communities and habitat found on the golf course land and considers likely impacts that could occur during construction and operation.

13.2.1 Adequacy of Information in the DR (and response)

The original development application included three reports that considered the nature, extent and quality of vegetation within the golf course site and development area in particular. These being:

- EBS Ecology: Native Vegetation Clearance Mount Lofty Golf Estate Data Report dated 9 May 2023 prepared by Dr. M Louter and A. Carpenter (NVC Accredited Consultants).
- EBS Ecology: Mount Lofty Golf Estate Ecological Flora and Fauna Assessment dated 13 December 2022 Version 3 prepared by EBS Ecology for Trice – Project & Development Managers on behalf of Mount Lofty Estate Pty Ltd.
- Arborman Tree Solutions: Arboricultural Impact Assessment and Development Impact Report - Stirling Golf Club, 35 Golflinks Road, Stirling – dated 6 December 2022 – Reference: ATS6360-035GolRdDIR R1

13.2.3 Flinders Block Bioregion Overview

The existing golf course is within the Flinders Lofty Block Bioregion (as defined by the Interim Biogeographic Regionalisation for Australia – IBRA – version 7), which extends from the northern Flinders and Olary Ranges to the southern Fleurieu. The southern region characterised by a Mediterranean climate with warm to hot summers and cool moist winters. Within the Mount Lofty Ranges, rainfall is more significant (approximately 1100mm at Stirling), where horticulture, forestry and winemaking are more typical land uses (alongside urban development).

13.2.4 Native Vegetation

Planning policy seeks that native vegetation be protected, retained and restored in order to sustain biodiversity, threatened species and vegetation communities, fauna habitat, ecosystem services, carbon storage and amenity values. Development should avoid and where not possible minimise the clearance of native vegetation and avoid significant wildlife habitat, rare, vulnerable or endangered plant species or significant due to being in a locality where the area has been extensively cleared. The development seeks to avoid and/or minimise such impacts.

The proposed development will result in some native vegetation clearance, habitat loss and disturbance to fauna communities, which is largely unavoidable on a golf course site. An updated Native Vegetation Clearance Data Report, prepared by Succession Ecology (dated 20 December 2024) has been provided as part of the proponent's Response). This report relates to the golf course site, with separate advice to be provided to the NVC in respect to the tree removals on Golflinks Road, although the NVC has provided advice on all tree removals in its final comments.

Succession Ecology identify the proposed clearance on the golf course now comprises 0.431 ha and seven scattered trees. The loss of native vegetation has been significantly reduced since the original DR was prepared, due to the removal of the accommodation pods from the application; the retention of internal access roads; re-alignment of the car park north of perfumery; the re-alignment of the Perfumery Gardens and Orchard; and the redesign of the hotel to reduce the building footprint. These changes have significantly minimised the impacts on the natural environment.

Clearance of native vegetation requires approval under the *Native Vegetation Act 1991* and Native Vegetation Regulations 2017. A 'Level 3' application would need to be approved by the Native Vegetation Council (NVC), including a Significant Environmental Benefit (SEB) offset as per the SEB Policy and Guide (NVC 2020c,d). The proponent will either implement an on-ground SEB or fulfil the SEB requirement by a payment into the Native Vegetation Fund. A preliminary estimate of the updated SEB payment into the fund is \$98,499.49.

The Data Report will need to be updated to incorporate refinements in clearance estimates at the time (e.g. resulting from the DR process and the progression of detailed design). As is standard for large projects, it is expected that the clearance areas will remain as estimates in the application and final clearance will be confirmed following construction with in-field audits against approved clearance areas, with the SEB adjusted as necessary to reflect the final clearance.

In its earlier advice, Succession Ecology reported that a desktop search identified a total of 88 threatened flora species within the search area; seven listed under the EPBC Act as 'known', or 'have habitat known to occur' and 81 additional flora listed as threatened under the NPW Act. Of these, six are considered Likely, Highly Likely or Known to occur within VA2. Thirteen (13) Threatened flora species are 'known or likely' to occur in the Project area.

The 7 scattered trees are significant in their size and height and contain numerous small, medium and large hollows and provide shelter or small birds, reptiles, bats and invertebrates. In particular, *Eucalyptus viminalis* was reported to provide a food resource for koalas. In addition, area VA1 (area where vegetation is to be removed) provides habitat for 8 species identified as *Likely*, *Highly Likely* or *Known* to occur. Notwithstanding the clear reduction in vegetation impacts, the NVC recommended that the three (3) Manna Gums identified to be removed for the hotel (Trees 2,6,7), should be retained – not only for their rarity – but also for their biodiversity value.

As required by the Native Vegetation Act, the proponent seeks to address the *Mitigation Hierarchy* in the following ways:

- a) *Avoidance* – amendments were made to the proposal to remove the accommodation pods and significantly reduce the vegetation clearance required. The majority of works are designed to utilise the current footprint of existing infrastructure such as the hotel, as well as utilising open areas or areas of exotic/planted vegetation species for the development of the carparks and the refurbishment of the existing perfumery.
- b) *Minimisation* – the development is to be constructed on already disturbed sites (hotel area, car park and perfumery) and will not result in significant additional clearance
- c) *Rehabilitation or restoration* - some areas will be revegetated with a preference for endemic species to the areas. However, due to CFS requirements some areas will not be rehabilitated. A weed management plan will also be developed to support the natural regeneration of native species.
- d) *Offset* – a SEB contribution into the Native Vegetation fund will be made to support restoration and conservation works in South Australia.

The NVC raised no objection to the proposed clearance, noting the strong recommendation to retain the Manna Gums, and for additional foot traffic near and/or through the Mount George Conservation Park to be carefully managed. In addition, the removal of blackberries should be staged prior to the planting of replacement native vegetation, in order to reduce impacts on bandicoots (who currently use this weed as habitat).

13.2.5 Native Fauna

Succession Ecology undertook a desktop and field assessment of the native fauna on the site.

While at the time of the survey no Threatened Ecological Communities were observed, six fauna species listed as threatened under the NPW Act have been identified within 5 km since 1995. 8 Threatened fauna species are 'known or likely' to occur in the Project area.

The desktop search identified “a total of 38 threatened fauna species within the search area. Seven species listed under the EPBC Act 1999 as ‘known, or have habitat known to occur’ and 31 further species listed as threatened under the NPW Act 1972”. The Yellow-tailed Black Cockatoo (threatened species) was observed within the Project Area at the time of the field survey. Of these, eight are considered Likely, Highly Likely or Known to occur within VA1. They include:

- *Petroica boodang boodang* (Scarlet Robin) NPW Act: (R) – Likely
- *Isoodon obesulus obesulus* (Southern Brown Bandicoot) EPBC Act: (EN), NPW Act (V): Likely
- *Zanda funerea whiteae* (Yellow-tailed Black Cockatoo) NPW Act: (V) – Known
- *Trichosurus vulpecula* (Common Brushtail Possum) NPW Act: (R) – Highly Likely
- *Zoothera lunulata halmaturina* (Bassian Thrush) EPBC Act: (EN), NPW Act (R) – Highly Likely
- *Pteropus poliocephalus* (Grey-headed Flying-fox) EPBC Act (VU), NPW Act: (R)- Likely
- *Corcorax melanorhamphos* (White-winged Chough) NPW Act: (R) - Likely
- *Antechinus flavipes* (Yellow-footed Antechinus) NPW Act: (V) - Highly Likely

Succession advises that the reduced area of vegetation removal and the loss of the seven scattered trees is not expected to have a significant impact on these fauna species and is not expected to impact population size, extent, structure, continuity, or survivability; the area of occupancy of a species; habitat critical to the survival of a species; or recovery of a species.

The reduction in the clearance of native vegetation has a flow on effect to further minimise the impacts on the native fauna in the project area. Based on the Succession report, which was reviewed by the NVC, the removal of the seven scattered trees is unlikely to be detrimental to the amenity values in the area considering the prevalence of tall forest in the surrounding landscape, although the retention of the Manna Gums as a food source and habitat for koalas and other animals was noted, alongside their cultural significance for First Nations.

13.2.6 Assessment of Impacts

Cumulative impact

The NVC must consider the potential cumulative impact of clearing of vegetation, both direct and indirect which provide important habitat for native flora and fauna. This includes the gradual reduction of remnant vegetation resulting in a loss of connectivity between remnant patches and reducing the available habitat to threatened flora and fauna.

Succession Ecology advised that the Data Report considers all sources of potential impact to native vegetation resulting from the Project, including the construction of infrastructure, the potential impacts on root zones due to compaction or construction, clearance required by the SACFS. It also considered indirect impacts such as hydrological impacts, weed infestations, dust emissions, native vegetation pruning for path/road maintenance and development works, and any future planned works for this project.

Construction Activities

The proponent’s documentation considers all direct and indirect clearance of vegetation resulting from the development, including the construction of infrastructure, impacts on root zones of vegetation due to compaction or construction, and any clearance required by the SACFS.

Whilst final documentation must still be provided, the main impacts from the development have been appropriately considered. Indirect impacts will need to be considered in a Construction Environment management Plan (CEMP) or similar, to control for hydrological impacts, weed infestations, dust emissions, native vegetation pruning for path/road maintenance and development works, and other associated project works.

Construction activities are likely to cause an increase in dust levels in the local area and coat vegetation, for the duration of earthworks and vehicular travel on un-surfaced tracks and has potential to result in the introduction and/or spread of exotic plant species, including declared and environmental weeds, primarily through ground disturbance and vehicle / machinery movements.

Construction activities can also generate waste products, both hazardous and non-hazardous, that can impact flora and fauna or their habitat within and adjacent to the Project Area. This may include soil contamination and smothering by litter or other waste materials.

These impacts are temporary and will only occur during construction. The proponent advises that dust suppression and management actions will be implemented to ensure all dust and waste is appropriately managed on-site and disposed of in accordance with regulatory requirements. It is expected that details will be provided in a CEMP.

Environmental Protection and Biodiversity Conservation Act (EPBC Act)

Following public notification of the proposal, the proponent undertook a Self-Assessment under the EPBC Act and Matters of Environmental Significance (MNES). This process determines whether a referral under the EPBC Act is necessary. Based on the self-assessment it was determined that no MNES are certain or likely to be impacted and that the proposed action will not require a Referral under the EPBC Act. Refer to Attachment O in the proponent's updated DR.

13.3 European Heritage

No State Heritage Places are impacted by the proposed development.

The nearest state heritage place is the Woodhouse Activity Centre (SHP 15170) situated to the west of Old Carey Gully Road, Piccadilly. The heritage listing relates to the building footprint only, such that the place itself is located 280m away from the western edge of the golf course and 809m from the existing golf course buildings. However, the proposed development does directly involve alterations and additions to an existing local heritage place, being the "Cottage, Mount Lofty Golf Club, Former Scent Factory, 'Le Chateau', 'Le Chateau a la Pong'" (LHP 15127) situated in the centre of the golf course site.

The proponent commissioned a heritage impact assessment by EBS Heritage to consider potential impacts to the heritage listed fabric of the former perfumery (refer *Mount Lofty Golf Estate - Former Scent Factory Heritage Impact Statement*).

The EBS report noted that the building has not been used as a perfumery since 1896 and is currently being used as a maintenance shed and office. The structure is in disrepair and does not currently contribute to the significance of the site as a perfumery and Former Scent Factory.

The proposed plans involve the partial demolition, restoration, conservation, reuse, and new built form elements adjacent the local heritage place. For a detailed specification of works refer to the EBS report (pp 10-13/23).

The plans propose the adaptive re-use of the perfumery, to accommodate a multipurpose space for use as café, retail or functions, an extension in the form of an outdoor dining area, orchard and perfumery replanting's in the adjacent garden areas. During construction, the perfumery will temporarily accommodate the golf club (and will be one of the last stage of works).

The EBS report considered the proposed works against the objectives of the *Heritage Places Act 1993*, the International Council on Monuments and Sites (ICOMOS) Burra Charter, and PDI Act. The condition of the building was found to be "poor", with wall cracking and large sections covered in ivy. The conservation / adaptive approach is to undertake minimal works to the interior, with the incorporation of a modern pavilion (with glass, sandstone and metal elements).

This report concluded that: 'the proposed work will not have an adverse impact on the current heritage values of the building but will rather enhance the heritage values; this includes the removal of the maintenance shed which can be considered an unsympathetic alteration to the existing site. Reuse of the Local Heritage Place will also ensure that the current dilapidated building is restored and maintained". (page 10/23 of the EBS report).

The proposed alteration and additions are supported, consistent with both the requirements of the Assessment Guidelines and performance criteria contained in the Planning and Design Code for the retention and adaptive re-use of local heritage places.

13.4 Aboriginal Cultural Heritage

The proponent advises that there are no registered sites or objects of Aboriginal Cultural heritage significance located on the subject land. The nearest registered site is located on the western side of Old Carey Gully Road, opposite the northern end of the golf course (hole 10), outside of the project area.

In support of their application, EBS Heritage prepared the *Mount Lofty Golf Estate Cultural Heritage Management Plan Framework* (CHMPF) to consider potential impacts on sites and places of Aboriginal heritage through disturbance during construction from a risk management perspective.

A previously undertaken cultural heritage desktop assessment (EBS 2021) identified that there was a low likelihood of disturbance to unknown Aboriginal heritage, however it is noted that the existing golf club and course is within the Native Title Determination of the Kurna People.

The draft framework demonstrates a commitment to the following:

- consulting and working with the Kurna Yerta Aboriginal Corporation (KYAC), the registered native title body corporate for the Kurna people;
- to ensure the developer meets its statutory obligations under the *Aboriginal Heritage Act 1988* (AH Act);
- implements measures to manage and protect Aboriginal cultural heritage in the pre-construction, construction, and operational phases; and
- that appropriate training and procedures are in place during construction (for workers and contractors).

The proponent is of the view that given the previous use and modification of the land for over 150 years, the likelihood of discoveries being made is considered low. However, during construction groundwork activities may inadvertently disturb previously undiscovered sites of Aboriginal cultural significance. There are no specific plans or requirement to seek a permit under section 23 of the

Aboriginal Heritage Act. Instead, a range of Aboriginal heritage protection and management measures – such as monitoring during construction activities – will be required as part of a CEMP.

AAR-AGD reviewed the proponent’s documentation, and whilst no objection was raised in respect to the risk assessment, they remained concerned that there has been no consultation with the traditional owners (represented by the Kurna Yerta Aboriginal Corporation – KYAC). They recommend that this should be undertaken to confirm the presence or absence of Aboriginal heritage that may not be on AAR’s central archives.

AAR-AGD does not consider that the requirements in the Aboriginal heritage section in the Guidelines have been satisfied. This predominantly relates to the provision of a Cultural Heritage Management Plan (CHMP). As the development has the potential to impact Aboriginal heritage during construction, the CHMP should include a cultural heritage survey identifying Aboriginal heritage and areas of significance, identify any potential impacts on Aboriginal heritage and outline measures that will be implemented to avoid or minimise impacts on Aboriginal heritage.

A number of conditions are recommended in the referral advice of AAR-AGD, with the preparation of a CHMP recommended as a planning requirement under the CEMP. Standard advisory notes are also recommended in respect to related statutory requirements under the AHA.

13.5 Traffic and Transport

The development application was supported by traffic and safety assessments prepared by CIRQA.

Current Arrangements

The golf course site is currently served by their main (public) access from Golflinks Road and a secondary access from Old Carey Gully Road, both being local roads under the care and control of Adelaide Hills Council. A total of 71 off-street carparks are currently provided in two grade level carparks adjacent the clubrooms, accessible via the main entrance from Golflinks Road.

Golflinks Road comprises a 5.0 m to 6.0 m wide carriageway with a single trafficable lane in each direction. The speed limit is 50km/h. The CIRQA report notes that Golflinks Road services forty-eight (48) residential properties (approximately), the golf club and Mount George Conservation Park.

Traffic volumes along Golflinks Road are approximately 444 vehicles per day (vpd). The CIRQA report notes that similar roads, designated as “local roads”, accommodate 1500-2000 movements per day. The am-pm-weekday and weekend peaks are in the order of 45-48 vehicle trips.

As noted in the CIRQA report, Old Carey Gully Road is a minor collector road under the care and control of Adelaide Hills Council, comprising a 6.2 m (approx.) wide carriageway with a single traffic lane each direction, accommodating approximately 1,625 vpd.

Access

Old Carey Gully Road and Golflinks Road form a priority-controlled T-intersection (with priority assigned to Old Carey Gully Road). All turning movements are permitted at this intersection.

The proposed development will change how the site is accessed by the type and number of vehicles travelling to and from the subject land. The main public access remains via Golflinks Road and the existing site entrance, approximately 620m from the intersection of Old Carey Gully Road.

During construction it is proposed that trucks and other vehicles access the site from Old Carey Gully Road and travel through the site on existing and/or upgraded internal roads. Further details will

need to be provided on this aspect in the CEMP. Emergency vehicle access (for CFS trucks) will also be accommodated from an additional access from Golflinks Road.

All access points have/can be designed such that all vehicles can enter and exit in a forward direction.

Traffic Demand

The proponents Traffic Impact Assessment (TIA) indicates that 290 additional daily movements are anticipated to be distributed via Golflinks Road with up to 70 trips occurring during the peak hour associated with the overall site and its uses. Commercial vehicle movements were found to increase by 5 movements additional movements per day over existing levels).

Based on the existing level of usage, the capacity of the local road and the anticipated increase in demand, the CIRQA report noted the following:

While there will be an increase in movements on Golflinks Road and Old Carey Gully Road, the additional movements would be accommodated without significant impact on traffic conditions. Notably, the future traffic volumes on Golflinks Road would remain within the level typically associated with a local road and the proposal therefore will not change the nature or function of Golflinks Road (nor other adjacent roads).

Furthermore, the CIRQA report noted that the Old Carey Gully Road/Golf course and Old Carey Gully Road/Golflinks Road intersections, have sufficient capacity to accommodate the additional movements. Major upgrades to these intersections were not considered necessary.

The proponent has confirmed that road widening works (of between 0.5m and 1.0m) will be undertaken between Old Carey Gully Road/Golflinks Road intersection and the main Golflinks Road entrance for approximately 75% of its distance to ensure vegetation impacts are minimised. The Old Carey Gully Road/Golf Course and Emergency Vehicle entries would need to be re-engineered to Council's specifications.

There will also be an increase in service and delivery vehicles to the redeveloped facilities, although such vehicles already access the golf course development, and adjacent residential development.

The above analysis does not discount the views of local residents, in that there will be an increase in traffic volumes of all vehicle types along Golflinks Road at completion, but subject to certain improvements (outlined below), the level of change is not *unreasonable*. The CIRQA report also notes that the peak period for the development's usage would "not directly correspond" with the peak commuter (am/pm) peaks for local residents who work elsewhere.

Waste collection and other deliveries could also be conditioned to be outside of peak periods.

Road Safety

A number of representors (who are local residents) and the local Council queried the safety and suitability of Golflinks Road to cater for the expected *increase* in vehicle movements (Identified above), and the adequacy of the existing roadway in terms of its width (to accommodate simultaneous movement from vehicles and trucks), absence of a dedicated walking path and the presence of larger trees on closely vegetated verges to the roadway.

The road conditions experienced when travelling along Golflinks Road and Old Carey Gully Road are not unique in the Adelaide Hills, with typical arrangements and experiences such as winding roads with blind corners, concealed driveways, roadside vegetation with larger trees common. Both recommended and gazetted road speeds vary, but are tempered by driver experience, weather conditions, traffic volumes and familiarity with the travel route and destination.

To assist the further consideration of these issues, CIRQA undertook a road safety review of Golflinks Road (which now forms part of the overall application), with the following aims:

- inspection of the subject area and associated existing road network;
- a review of available (existing) traffic volume data and crash statistics;
- identification of any road safety issues noted during the inspection consideration of any additional implications associated with the development;
- liaison with Adelaide Hills Council's Civil Service representatives, and
- preparation of this report detailing the review and associated findings.

The key findings related to the narrow width of Golflinks Road in certain locations (~5m).

It is noted that CIRQA's updated traffic assessment and its consideration of both the geometric alignment, site distances, signage and marking and vehicle turn paths have been considered by the local road authority, and its findings generally accepted (noting further information was subsequently sought on site access and infrastructure requirements from Council).

SIDRA analysis confirmed only a very minor reduction for each intersection's efficiency, with the maintenance of a Level of Service A (the highest rating), being 0.2 to 0.5 additional seconds delay or less for any one movement during the weekday and weekend peak hours.

There have been no reported crashes on Golflinks Road in the past 10 years (DIT data).

Sight distances were found to be 'reasonable', although some pruning could be undertaken, consistent with Council's maintenance program along public roads. Some additional improvements could be made in the way of warning signs, hazard markers and reflective guideposts (as noted in section 4.3 of CIRQA's road safety report).

These requirements could be implemented via a TMP (required as a condition of approval).

Further consideration could be given widening (in the form of shoulder sealing / improvement) along Golflinks Road in specific locations. Council is not opposed to these works, subject to detailed engineering designs that take account of existing service and infrastructure locations, and where vegetation impacts can be minimised.

From a safety perspective, however, some vegetation removal (including trees that are clearly dead), would be warranted to improve the safety and trafficability of Golflinks Road where shoulder sealing was identified as being beneficial and necessary. The speed limit at the site access from Old Carey Gully Road is also recommended to be changed from 80km/h to 60 km/h.

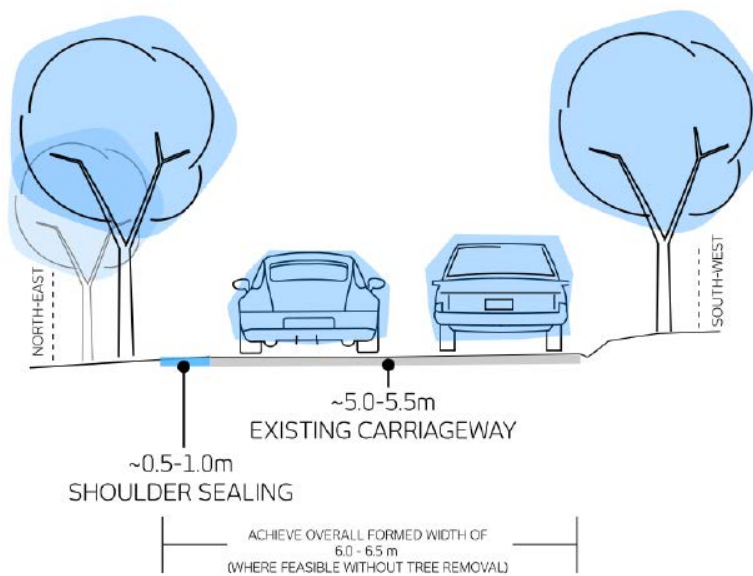


Figure 10: High-level cross section of the potential shoulder sealing arrangement (Source: CIRQA).

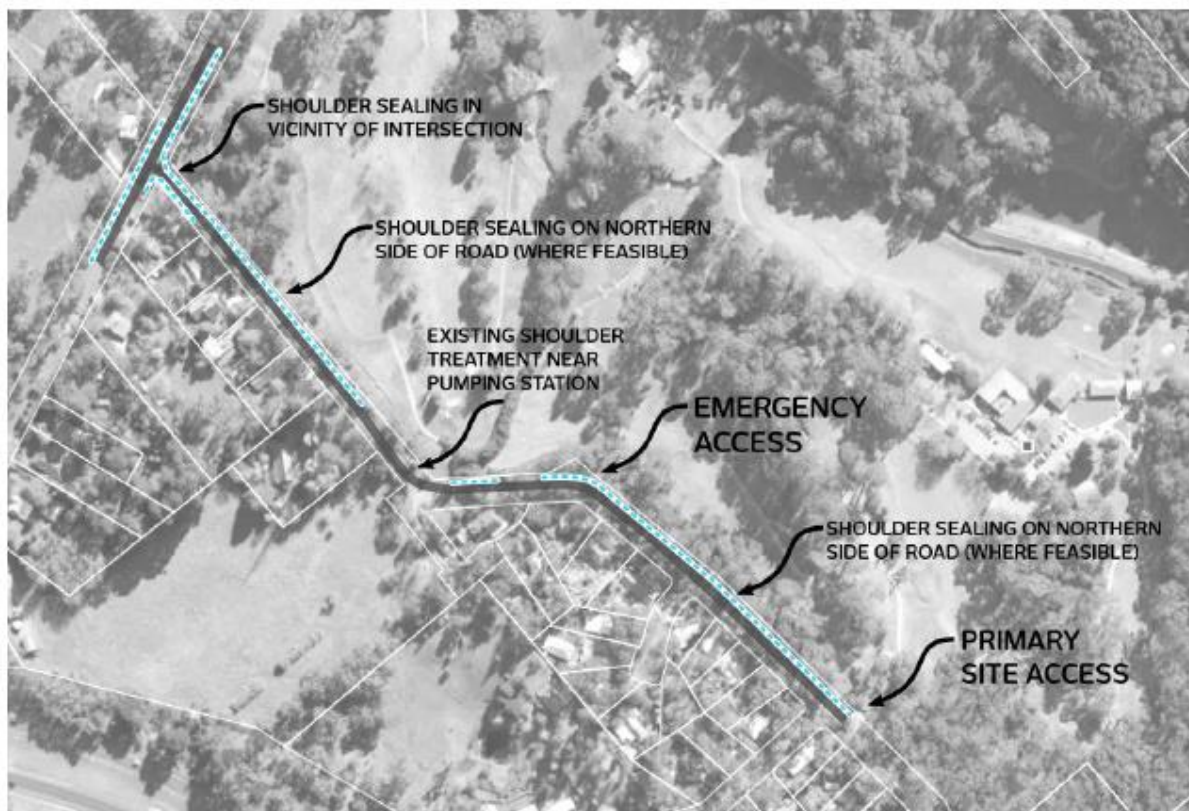


Figure 11 – Identified shoulder sealing zones along Golflinks Road (Source CIRQA)

Council requested additional swept paths and further modifications to the intersection to Old Carey Gully Road, Golflinks Road and Golflinks Close for manoeuvrability of 19m articulated vehicles. Further details / modifications include road widening in front of 26 Golflinks Road; a swept path analysis for a 19m articulated vehicle at all intersections (minimum clearance of 300mm); and the upgrade of the Davenport Road access and associated works, including drainage crossings, road build-up, and asphalt widening, must comply with Council' standards.

It is recommended that the requirements be followed up through a condition of approval to ensure that any upgrades required can accommodate larger trucks (and their turning movements) and that driver sightlines in both directions meet Australian standards.

Walking Trail

The absence of a dedicated off-road walking trail (and the safety risk to pedestrians) was noted by local residents as a current problem, which an increase in traffic volumes would exacerbate.

The proponent has agreed to provide a walking trail within the golf course site to provide alternative pedestrian access to/from the site (and along Golflinks Road more generally).

An indicative site plan has been provided showing the proposed location and alignment of the walking trail in the updated Development Report. The proponent has proposed that this walking trail be gifted to Council. Council has provided in principle support.

The final design of the walking trail is recommended to be a reserved matter. The final design would need to consider the alignment and construction of the trail, not only to avoid additional vegetation impacts, but to also consider connections to and from Golflinks Road, and through the golf course site, connecting with the Heysen Trail and the MGCP.

Carparking

The CIRQA report considers the range of uses and variable demand over time to meet anticipated peak parking requirements (with an acceptance that the tourist accommodation, function, café and golf club uses will complement and interact with other over the course of each day).

The CIRQA report considers the interaction of these uses on pages 12-15 of their amended report.

Whilst the individual carparking rates (recommended by the code) for each standalone land use would be greater (i.e. 352 spaces), it is accepted practice (and which the code contemplates) for lesser carparking numbers to be provided where it can be demonstrated that a more variable, shared demand / occupancy can be met with reduced numbers provided: particularly where there will be a demonstrable crossover in demand between the food/beverage, function, accommodation and golf course uses within the overall development.

Based on the analysis provided by CIRQA and supported by Council, the on-site carparking provision is considered to be acceptable to meet likely demand peaks. A total of 200 formalised parking spaces plus a porte cochère (set-down/pick-up) facility will be provided with the main development. Additional parking will be provided adjacent the 'Perfumery' building (20 spaces) and a staff car park adjacent the internal circulation road (37 spaces), the latter spaces accessible from Old Carey Gully Road only. Total carparks to be provided is 257.

Additional informal/overflow parking areas within the site that could be used for larger events.

The design of parking and access areas within the site can meet relevant Australian Standards (as outlined in Australian/New Zealand Standard, Parking Facilities Part 1: Off-street car parking (AS/NZS 2890.1:2004) and Australian/New Zealand Standard, Parking Facilities Part 6: Off-street parking for people with disabilities (AS/NZS 2890.6:2009).

Final design detail will be required for those carparks to be located off the internal access from Old Carey Gully Road (servicing the café/perfumery and staff), to ensure that the identified spaces can be suitably designed and constructed to minimise impacts to the existing landform and vegetation, although some smaller, planted vegetation may require removal. A reserved matter is recommended so these details can be considered, alongside the overall development.

Construction Access

Both Council and local residents raised concerns with construction traffic utilising Golflinks Road and the main access to the golf course site. The proponent has agreed to utilise Old Carey Gully Road (via an upgraded existing access) point, that will take construction traffic via an internal roadway, through the middle of the site. It is noted that a more suitable crossing of Cox Creek will be needed, either through replacing the existing bridge to handle heavier vehicles (being a 5-tonne limit now) and/or some form of ford (requiring temporary alterations to the embankments). Where construction access is required via Golflinks Road, this would need to be outlined in a TMP/CEMP, which may also necessitate temporary traffic controls.

Infrastructure Upgrades

As outlined in the CIRQA reports, the necessary infrastructure upgrades outside the site of the development, both along Old Carey Gully and Golflinks Drive, will need to be the subject of a formal Infrastructure agreement between Council and the proponent. Final design detail will be required on the implementation of the various road related improvements, from site access to shoulder sealing, which can be suitably conditioned/detailed in a TMP and Infrastructure Deed.

Council requested that formal written agreements (in the form of an Infrastructure Agreement and Land Management Agreement) be entered into with the proponent, with the costs met by the developer. The requirement for an Infrastructure Agreement is supported, however the Land Management Agreement (being an agreement between the Council and landowner to ensure any upgrades remain the responsibility of the landowner), is a separate matter to be negotiated between the respective parties.

Wider Road Network

The CIRQA report also considered potential impacts from the golf course site back to the South Eastern Freeway. Whilst some impact on the level of service was identified at the Barker Road/Pomona Road/Avenue intersection, they were not sufficient (as adjudged by DIT) to require an upgrade, such that no conditions were recommended by the state road authority.

13.6 Noise and Vibration

The development will generate noise emissions during construction and operation.

Noise emissions have the potential to cause adverse impacts for humans and fauna, particularly if appropriate design, mitigation and/or management measures are not implemented.

Public submissions raised a number of concerns with potential noise impacts from the operation of the development, specifically functions after hours and potential disturbance to native fauna.

The proponent commissioned BESTEC to prepare an *Environmental Noise Assessment* which considered the environmental noise impact to the nearest noise sensitive receivers resulting from operational activities, including functions, in the proposed new development at the existing Stirling Golf Club. To assist in this consideration, a continuous noise survey was conducted over 5-day period at the boundary of the nearest noise sensitive receiver.

BESTEC's analysis of the collected *background* data revealed:

- The measured lowest background noise levels (L_{A90}) during the proposed hours of operation is 31 dBA
- The lowest ambient noise level (L_{Aeq}) measured during the proposed hours of operation is 34 dBA

Pre-function and function rooms may be used to accommodate functions with live or pre-recorded music such as conventions, weddings, corporate events and other private gatherings.

To consider noise impacts BESTEC undertook an assessment against the EPA Guidelines for Music Noise and SA Planning and Design Code requirements was undertaken. The BESTEC report considered how music noise emissions from the proposed multi-purpose function space are best controlled to minimise noise nuisance in a quiet, peri-urban location. This was raised by local residents as a key benefit of living in Stirling.

In order to minimise noise impacts, consideration was given to the acoustic characteristics and transmission of noise both within the development and to sensitive receivers. The assumptions used to support the analysis were that delivery and rubbish collections occur between the hours of 7am and 10pm (and occur via the main entrance on Golflinks Road), no functions extend beyond midnight (with no more than 300 guests), and the construction of the development confirmed to certain building standards (i.e. laminated glass, steel cladding etc.).

Several recommendations were made to the design and equipment operation of the function centre and hotel, whilst mechanical services would still need to be assessed. The operation of the carparking areas was assessed to comply with the 47dBA limit recommended by EPA, whilst noise emissions “due to the delivery vehicle activities achieves the day-time environmental noise criteria and would not affect the amenity of the adjacent residential area”.

The key conclusions:

- The predicted music noise levels at the nearest noise sensitive receiver will achieve the selected criteria under worst case meteorological conditions provided the sound pressure levels from each speaker is limited to 90dBA at 1m based on 4 speakers being used.
- The continuous noise levels at the nearest noise sensitive boundary resulting from patrons at the terrace and inside the function hall will achieve the selected continuous noise criteria under worst case meteorological conditions.

In order to meet these outcomes, a number of conditions were recommended, the primary requirement being that the building’s design, delivery times and operation of the functions area are in accordance with the BESTEC report, and that the final specification and installation of the mechanical services is informed by a design and compliance requirement.

Whilst some concerns were raised with the noise methodology adopted in the BESTEC report, the EPA advised that with the adoption of these recommendations, noise from the proposed development is unlikely to have an adverse impact on nearby residents. The final building design documentation will need to incorporate the acoustic report’s recommendations.

No vibration impacts should result from the operation of the development. During construction, the operation of machinery, equipment and vehicles will be managed under a CEMP, to ensure that noise and vibration nuisance are minimised.

13.7 Stormwater Management and Wastewater

Planning policy seeks to maintain the quality of surface water flows and limit the volumetric discharge to the environment to pre-development levels. The quality of stormwater runoff within the Adelaide Hills Watershed is of particular importance, with the closet point of discharge being Cox Creek, which bisects the golf course site.

The golf course site has been significantly modified, with the creation of fairways and greens, and the footprint of existing buildings and infrastructure (and their associated impermeable surfaces). The redevelopment of the golf course, whilst generally positioned on the site of the existing golf facilities, will result in increased surface flows, which need to be appropriately managed.

An existing dam within Cox's Creek provides irrigation water for the golf course. The proponent has advised that no works or modifications are proposed to this dam or course irrigation methods. Flood risk has been considered elsewhere in this report, but in summary a freeboard height of 3m is provided between the lowest finished floor level (FFL) and the maximum flow depth of Cox's Creek, indicating that any future risk of inundation from a flood event requires no further investigation.

The proposed stormwater design is multifaceted.

Firstly, runoff from upstream catchments will be safely routed around the east and west of the proposed building. Secondly, runoff intercepted by the roof area will be harvested for reuse. And thirdly, runoff captured at surface level within the hotel will be collected into a pit and pipe system, where minor flows will pass through gross pollutant intercepting baskets, or during a major storm event, directed towards a stormwater basin located adjacent Cox's Creek.

The stormwater basin (150m³) will provide a tertiary level of water quality treatment level through the use of a bioretention raingarden, capable of accommodating a 4EY ARI (exceedance per year, average return interval) in accordance with the EPA and Water Sensitive SA best practice guidelines.

Stormwater collected into the basin will also be detained to ensure post-development peak runoff does not exceed the pre-development peak runoff volumes for both minor and major storm events respectively. Basin design will include a planted floor to assist nutrient removal, deep filter media, and transition / drainage layers in accordance with EPA / Water Sensitive SA best practice guidelines.

A MUSIC model was developed to demonstrate compliance with water sensitive guidelines, which seek to reduce suspended solid, phosphorus, nitrogen and gross pollutant loads (with estimated reductions well above target levels across all classifications).

Wastewater infrastructure and storage will also be situated above the minimum FFL or outside of surface flow paths, minimising any risk of contamination. No works are proposed that will affect current groundwater levels, estimated at 5-10m depth.

In terms of water collection and reuse, a 50kL rainwater storage tank will be installed and be utilised for landscape irrigation, laundry services, and washdown of bin rooms and golf carts, which will contribute 13% of the buildings' total annual water demands, or 25% of the buildings' non-potable water demands (Refer D2 report), equivalent to 639,000L.

A final stormwater management plan is recommended as a condition of approval.

13.8 Hazards

13.8.1 Bushfire Hazard

The golf course land is within a high-risk bushfire area (as defined by the Planning and Design Code). The Code seeks to control the siting and design of buildings to mitigate the threat and impact of bushfires on life and property, facilitating access for emergency service vehicles and situating activities that increase the number of people living and working in the area away from areas of unacceptable bushfire risk. These requirements are also reflected in the assessment guidelines.

The advice of the SA CFS was sought in relation to the project. Under the Adelaide Mount Lofty Ranges Bushfire Management Area plan, the area of the property is rated Extreme.

Before lodgment of the formal application, consideration was given to placing the accommodation pods on the northern side of the golf course land, adjacent the MGCP. This option was discounted due to the elevated hazard risk and vegetation loads within both the MGCP and flanking the golf course fairways. An updated design then placed both the hotel accommodation and accommodation pods (now removed) on or adjacent to the exiting clubrooms (which also takes advantage of the cleared fairways and pond located between this location and the MGCP).

The Development Report documentation included a number of reports related to the assessment and mitigation of bushfire hazard risk. These included a *Bushfire Attack Level (BAL) Assessment* and *Bushfire Management Strategy* by BSP Design Pty Ltd, and a Bushfire Survival Plan (which was subsequently updated in the final Development Report document).

The BSP Report sought to define the Bushfire Attack Level, or BAL rating.

The BAL is the Australian standard for measuring the risk of a building's exposure to ember attack, radiant heat and direct flame contact. The BAL rating determines the construction and building requirements necessary to protect homes and other forms of accommodation in bushfire prone areas. The report's site considerations, including vegetation clearance zones, and methods of calculation are outlined in the BSP Design report, with BAL's calculated for three zones: the golf club, the hotel and the accommodation pods.

With the accommodation pods now removed, the BAL ratings for the hotel and golf club elements range between 12.5 and 40, dependent on building orientation and height, and existing vegetation. The SACFS reviewed the original and revised plans for the development and raised no objection to the proposal but have requested that a final Bushfire Survival Plan (BSP) and Bushfire Management Strategy (BMS) be prepared and implemented prior to occupation.

Final BAL assessments will be required for the hotel complex once vegetation removal and management has been implemented. Both the BAL re-assessment and management plans have been recommended as conditions of approval. A broader Emergency Management Plans (to cover all emergency situations) has been recommended as sub-plans of CEMP and OEMP.

13.8.2 Flood Hazard

The golf course site is bisected by Cox Creek and located within the Mount Lofty Ranges Catchment (Area 2) and Hazards (Flooding – Evidence –Required) Overlays of the Planning and Design Code. A Stormwater Management Plan and Integrated Water Management Plan were provided with the initial DR and appendices. Water quality considerations will be addressed elsewhere in this Assessment report; however, the development does seek to manage potential impacts from surface water to downstream flows with a number of mitigation methods.

Various stormwater capture, release and re-use measures seek to contain roof and surface run-off volumes to pre-development levels, prior to discharge to the existing drainage network. Detention storage of 150m³ is to be provided with a staged flow control over the outfall to Cox's Creek.

Whilst water levels within Cox Creek have the potential to rise 2.5m, it is noted that the proposed development will be sited on elevations between 418-420m AHD (6-8 metres above the creek) such would not be subject to a risk of inundation in a 1% AEP major flood event. A range of additional rock rip-rap works are proposed to minimise erosion along Cox Creek, whilst the internal pipework has been designed to manage a 10% AEP storm event to further minimise downstream flood risks.

The development will neither impede flood waters nor exacerbate flood risk within the catchment.

13.9 Site Contamination

The risk of contamination from both former and current land use activities is considered to be low, noting the land's long-term use as a golf course. Whilst some point sources of contamination are to be expected, such as from the storage of fuels and chemicals, these can be readily addressed during the construction phase of the development under a CEMP.

13.10 Social and Community Impacts

The redevelopment of the Stirling Golf Club has the potential to create a number of social and community impacts to local residents and landowners within the immediate locality.

A number of these impact are considered in the proponent's Development Report and technical reports. For example, a loss of habitat and biodiversity through vegetation removal, an increase in traffic volumes on local roads, the potential for noise and light overspill from after-hours use, a reduction in service levels for critical infrastructure and a significant increase in people moving around the site (either as visitors, golfers, staff or guests).

For impact assessed developments, the social impact assessment seeks to consider both potential and likely impacts on local communities and the degree to which existing issues may be exacerbated or new problems created. Particularly in terms of critical services that may contribute to an erosion of a local resident's or household's quality of life, or in the case of an adjoining business or land use, contribute to a loss of production or economic viability.

Submissions received in the public notification process raised concerns that the impacts on the local community, being the closest residences along Golflinks Road and Old Carey Gully Road, had not been appropriately identified in the Development Report, as required by the Assessment Requirements. Whilst the report does consider the most likely impacts to local amenity, such as traffic, amenity and services, further investigations were undertaken to inform the assessment.

To assist in the consideration of these matters, the proponent prepared an additional supporting document, *Social Impact Statement: Mount Lofty Golf Estate* (24 May 2024) with its updated Development Report. This considered the demographic composition of the local community and consideration of potential impacts to likely services.

The main conclusion was that as the development itself does not create an increase in the local resident population, such that access to social services, such as schools and hospitals, are unlikely to be affected. The development will have a need for emergency service coverage, however there is no indication that additional services or equipment would be needed.

The updated Development Report (and its accompanying technical papers) take into account the changes to the project, most notably the removal of the accommodation pods and the provision of additional staff carparking accessible from Old Carey Gully Road, which should further minimise local impacts. The construction period is still 2-3 years.

The social impact report considers both the settlement history and community profile of the local area. Currently, the dominant development type comprises predominantly single storey, large homes on generous allotments. The Mount Lofty Golf Estate was established in 1925, with an 18-hole course completed in 1963 and the clubhouse built five years later.

The proponent defined the statistical reference area to be the most adjacent SLAs, situated to the north and west of the golf course site (comprising 953 persons). Residents and/or landowners to the east of the land, being further separated by the MGCP, were not considered to be directly impacted by the development (an analysis which is supported), though may benefit from any wider economic effects of the development. Existing and future users of the golf club, including those currently and proposed to be employed, are also considered to be *positively* affected by the development.

The demographic analysis of the reference area did not reveal any noticeable differences in the respective age profiles of the community or wider hills community (being a slightly younger age cohort, 10-18 years, and slightly less of retirement age), with increased rates of owner occupancy than renters and *marginally* larger household sizes overall, indicating more working-age families (with an average household size of 3.4). Educational attainment at a bachelor's degree level or above and median household income is significantly greater than the hills community as whole by 15% and 25% respectively. Overall, the level of socio-economic disadvantage was found to be low.

The proponent then considered the baseline community indicators against the likely impacts from the development (as generally outlined in Table 7 of their report). These relate to matters of visual amenity, noise and light overspill nuisance, increase traffic volumes, construction activities, loss of native vegetation, servicing concerns, and whether or not these impacts can be satisfactorily avoided, managed or mitigated over the course of the construction and operational periods.

Changes to the project's design have reduced a range of potential impacts – particularly in terms of habitat/biodiversity loss – whilst further information has been provided in the assessment of environmental performance and service infrastructure of the main development. The addition of a walking trail, a new emergency vehicle access and additional staff parking from Old Carey Gully Road, and road improvement of Golflinks Road, have all sought to limit direct impacts to residents along or near Golflinks Road.

The upgrade and/or augmentation of service infrastructure that meets Council and SA Water requirements, should not compromise or affect local residents or their own service levels, but deliver a neutral or improved outcome. The development should place no additional demands on local community, social or emergency services facilities, which in the latter case involves a modern building, designed to current standards and SA CFS requirements.

Whilst the proponent's social impact analysis, based on the directly impacted community and the wider Adelaide Hills community, draws a conclusion that this community has a higher level of social resilience, stability and education levels, that allows them to *"more readily adapt with change and access established support networks and systems"*, a development of this nature should not rely upon existing reservoirs of accumulated social capital to make good development impacts, that have the potential to diminish shared amenity and lived experience.

To be clear, local residents along Golflinks Road will be inconvenienced to varying levels, first from construction activities, and then from operations, such as increased traffic volumes, however the proponent's response to manage construction and operational (staff) traffic movements and undertake shoulder sealing works are a necessary step to improve overall safety and trafficability, whilst other *residual* impacts can be adequately addressed through both conditional requirements and management plans.

13.11 Economic Impacts

The redevelopment of the golf club comprising hotel with suites, serviced apartments, a function room, restaurant sports bar, gallery and café, and wellness centre with a gym and spa treatment rooms and a refurbished 18-hole golf course will have a positive economic effect, both in terms of inward investment, demand for goods and services and employment in the Adelaide Hills region (in general) and Stirling (in particular).

The DR contained an economic analysis by Hudson Howells (which was then updated in a follow-up document) and considered the expected economic activity / economic impact to the Adelaide Hills South Australian Government Region and the state resulting from the construction and operation of the proposed development.

The key findings of the report are outlined below:

- Construction phase: gross regional product of \$50.5m and household income of \$35.8m to the Adelaide Hills economy and 159 construction jobs, with a statewide contribution of \$108.7m to Gross State Product and household income of \$71.1m to the South Australian economy, with a further direct and indirect 274 jobs.
- Operational phase (at year 10): gross regional product of \$24.4m and household income of \$9.7m to the Adelaide Hills economy and 170 direct and indirect jobs, with a statewide contribution of \$31m to Gross State Product and household income of \$12.9m to the South Australian economy, with a further 197 direct and indirect jobs.

Employment figures were based on direct employment (within the development), first order suppliers of goods and services, and less direct increases from various multiplier effects, either as spending and/or growth within the wider regional or state economy. Overall project expenditure was found to be \$109m across the three-year construction period. Operational (direct) employment has been estimated at between 76-79 employees on a full-time equivalent basis.

A cost benefit analysis was also undertaken, which concluded that the “net benefits of investing in the development (project case) outweigh the net benefits of not investing in the project (base case)” (p 9, Hudson Howells 2024 report). Whilst the benefit cost ratio was estimated to be 1.05 and the internal rate of return at 7.8%, the report acknowledged that not all of the project’s economic and social benefits could be considered and/or quantified, which would include:

“..... improvement to landscape quality, adaptive reuse of a local heritage item, improvement to water quality treatment, better connectivity to Heysen Trail, better accessibility for service vehicles and fire-fighting vehicles, improvement to the golf club as an important community asset, and improved meeting facilities for social and community interaction”.

Annual operating costs (at year 10) were estimated to be \$13.7m from revenue of \$24.1m. Hotel occupancy rates were estimated at between 45% to 76% over the course of the first ten years of operation, dependent on whether or not one, two and three-bedroom suites were utilised.

The DR was accompanied by letters of endorsement from the SA Tourism Commission, Adelaide Hills Tourism and members of the Stirling Golf Club. The Developer expects an additional 17,000 rounds of golf will be played at the Mount Lofty Golf Estate in addition to the current activity on the site.

Whilst there are a range of accommodation providers within the Adelaide Hills area, the advice of the SATC noted that the *Regional Visitor Strategy 2025* (RVS2025) identifies such developments as critical in providing experiential accommodation and activities (such as golf) that support overnight visitation from intrastate, interstate, and international markets in the regions.

It is noted that the original Hudson Howells report included the consideration of the accommodation pods, whilst the updated report removed this element from the updated analysis, such that the economic benefits at the operational phase were reduced. Whilst this change has statistical significance, this does not unduly diminish the overall, net positive effect of new and upgraded facilities that provide additional accommodation options and employment opportunities within a near city location, over and above what already exists on the site and within the region.

13.12 Service Infrastructure

The proposed development will require an upgrade or augmentation of service infrastructure to support the new hotel and golf course redevelopment. To consider likely impacts on existing service levels, the proponent commissioned reports from LUCID (Memorandums dated 9 December 2022 and 31 May 2024), whilst further advice was sought from both Council and SA Water.

13.12.1 Water Supply

The existing golf course site is serviced by 2x100mm SA Water Corporation mains located within Golflinks Road and Old Cary Gully Road. No recycled water service is available.

To meet future demands, LUCID has advised that onsite domestic water storage tanks and a pressure pumpset will be required (which have been incorporated within the main resort building envelope within the lower ground level plant rooms).

Building fire services / water supply will be provided independently of SA Water's mains supply, consisting of a separate water source, hydrant and pump systems. These facilities will be designed and installed in accordance with SA CFS Service requirements, with one consolidated water storage to be provided for both building and precinct purposes (~500kL).

For the related land division application, SA Water advised that if approved, the augmentation, financial and easement requirements of the Corporation must be satisfied.

13.12.2 Electrical Supply

The Adelaide Hills area is serviced by SA Power Network's existing overhead high voltage and distribution network. The LUCID report notes that the *"existing supply enters the site from Old Carey Gully Road via underground high voltage cabling before transitioning to overhead high voltage cabling within the site"*. SAPN has advised the proponent that alterations and upgrades will be required to the high voltage infrastructure, namely a new (larger capacity) transformer to meet the electrical demand of the proposed buildings with the existing transformer removed.

These works have the option of using either the Old Cary Gully Road or Golflinks Drive connections. Both Golflinks Drive and Old Cary Gully Road have existing overhead high voltage infrastructure, with consideration being given to diverting the existing overhead SAPN power lines below ground, with a final decision to be made during detailed design (both options are detailed in the LUCID report).

FMG Engineering has prepared a preliminary wastewater management plan, which relies upon the following elements (reproduced from the FMG report):

- *Collection of wastewater from all wastewater generating facilities into septic tanks which are desludged on a yearly basis;*
- *Residual effluent from the septic collection will be conveyed into a holding tank, and pumped to the existing Council pump station on Golflinks Road at nominally 1.4 L/s;*
- *Council's existing pump station will be upgraded from the current 1.5L/s capacity, to a new pump capacity of 2.6L/s within the existing rising main. Additionally, a further 20m³ of emergency storage will be provided below ground at the Council pump station.*

The FMG report considers internal wastewater pump and holding tank design, the volumetric capacity of the balance tank (with contingency with backup pumps), and downstream pump capacity, including the need for system upgrades. Two pump stations are located on Golflinks Road (PS1 and PS2), with PS2 located at the western end of Golflinks Road, with the rising main located in the road reserve, and proceeds to Old Carey Gully Road and turns south-westwards.



Figure 12: Proposed Wastewater solution (Source FMG)

Wastewater will be collected from the new complex and via gravity feed connect with a large holding tank west of the hotel building, with wastewater from the perfumery development also being moved to the same tank.

Wastewater is then pumped to PS2, with this pump station upgraded to accommodate increased flow rates, including 20m³ of supplementary storage. The location of this concrete chamber would need to be determined, most likely situated on golf course land, and sited to avoid any additional vegetation loss.

Final specifications will need to meet Council requirements (supported by a developer contribution to meet these costs), with further details and confirmation that the correct standards are being met for the pump station to achieve the increased flow rate. In-principle support has been provided by SA Health and the EPA (on the basis no on-site treatment or disposal occurs). Further details can be provided through conditions of approval and/or Infrastructure Deed.

The capacity of the Heathfield Wastewater Treatment Plant (WWTP) was raised in public submissions as being insufficient or incapable of meeting any additional inflows. Based on a network analysis to confirm additional flows can be conveyed by their sewer reticulation system, and ultimately the Heathfield wastewater treatment plant, SA Water has confirmed that there is sufficient infrastructure and treatment capacity to treat additional flows resulting from the proposed development.

13.12.4 Other Services

Mobile and fixed line services are available to the subject land, with 3G to 5G mobile services offered by various providers (with coverage subject to the location of infrastructure and topography, with 3G services being progressively retired through 2024). The subject land can be connected to the NBN Network via Fibre to the Node technology. The NBN is expected to roll out fibre to the premises connections in Stirling by December 2025, but this may or may not include the golf course site.

There is no natural gas supply to the site and no connection is sought or required.

13.13 Construction and Operational Effects

FMG Engineering have provided a draft Construction Environmental Management Plan (CEMP) for the construction and redevelopment of the Mount Lofty Golf Estate.

The project will be constructed and operated under an environmental management framework to manage any *residual* and *short-term* impacts that cannot be adequately avoided during the construction and/or operational phases of the development. These management plans would comprise a Construction Environmental Management Plan, Operational Environmental Management Plan, Cultural Heritage Management Plan and Traffic Management Plan.

These plans will set-out various legislative requirements and industry-accepted principles, procedures and practices to manage and mitigate construction and operational impacts to land and resources, and to further identify and protect areas of cultural significance.

It is understood that the proponent and the construction contractor will be responsible for the implementation of each plan, and through appropriate monitoring, seek to update such plans as based on changed circumstances and feedback from workers, landowners and other authorities.

In the updated DR the proponent has advised that during construction, vehicles will access the site via Old Carey Gully Road. This will require additional work to improve the internal road access for larger vehicles, including the trafficability of the existing Cox Creek bridge to the main building site. The proponent has requested that final details be provided during design development, a reserved matter is recommended.

13.14 Management Mitigation and Modelling

Regular inspections and monitoring of work practices to minimise potential impacts to native flora and fauna will be required over the course of the construction phase of development, and in the first 12 months of initial operations, the rehabilitation and regeneration of disturbed areas.

Periodic inspections, record keeping, formal auditing and compliance actions will need to be implemented to verify that various conditions and requirements of any development authorisation are complied with at the state level.

Monitoring and reporting protocols will need to be included in each of the draft EMPs, including the need to periodically review and update these plans, ensuring a process of adaptive management and response is undertaken that can measure both the effectiveness and performance of the control and mitigation measures.

14. Conclusion

The updated DR and associated documentation that form the major development application provide a comprehensive analysis of the potential benefits, impacts and implications of establishing the Mount Lofty Golf Course and Resort project

The environmental impact assessment process involved consultation with the public, state agencies, infrastructure providers and the Adelaide Hills Council. It is acknowledged that a large number of public submissions were received, raising several concerns with the proposal, especially the extent of vegetation removal and subsequent impacts on native fauna (initially proposed) and impacts from increased traffic volumes on local roads.

The proponent has taken these concerns seriously, and modified the proposal to substantively reduce vegetation impacts, and to undertake a number of upgrades to a local road and civil infrastructure. These changes and commitments address the key concerns raised by the local community on amenity, biodiversity and safety grounds. As the development footprint has also been reduced, any residual vegetation impacts are more a requirement to provide adequate building fire safety clear zones to meet SA Country Fire Service recommendations.

A small number of trees will also be required to be removed and/or pruned within the Golflinks Road Reserve to accommodate road widening works of between 0.5 and 1.0m, whilst the rebuilding of the Old Carey Gully and Emergency Service Vehicle Access points will allow additional staff, visitor and fire truck access to the golf course site without needing to use the main site access.

No objection to the amended proposal was raised by state agencies, utility providers or the local Council, although further information was sought. Matters of detailed design or the management of residual impacts, are recommended to be managed via a range of reserved matters (requiring further assessment) or as conditions of approval.

Construction and operational impacts have also been considered, with the requirement for a series of management plans, whilst the design and setback of the main hotel and clubhouse elements are well setback from more sensitive receivers along Golflinks Road. Based on the proponent's technical advice and peer review from relevant state agencies and council, the operation of the development can meet all relevant environmental standards.

These plans would address measures to minimise and mitigate all residual and/or short-term impacts that cannot be adequately avoided during construction and operation. Where necessary, targeted monitoring and auditing would consider the effectiveness of such measures and/or require refinement to avoid any longer-term impacts. Road and infrastructure requirements would need to be implemented prior to the commencement of construction or (staged) operation.

The updated DR concludes that development is an appropriate one on the subject land, noting that the golf course land use, limited accommodation and a clubhouse/events space has already been established. On balance, it is considered the proposal has sufficient merit and can be supported.

15. Recommendation

In regard to the satisfaction of the reserved matters and general conditions (as outlined in Parts A and B below), documentation submitted by the proponent shall be considered by the Department for Housing and Urban Development - Planning and Building, in consultation with relevant state agency and local government representatives, from which advice to the Department and/or Minister for Planning (the Minister) will be provided to determine whether each reserved matter or condition has been satisfactorily addressed, or whether further information is required.

PART A: MATTERS RESERVED FOR FURTHER ASSESSMENT

Pursuant to s.48(6) of the *Development Act 1993*, the following matters are reserved for further assessment:

1. The proponent must, prior to the commencement of construction for each project element / stage, submit to the Minister for Planning (the Minister) for approval:
 - a. Final detailed plans and designs for all structures and infrastructure, including but not limited to site plans, building floor plans, elevations, cross-sections, details of cut and fill, to ensure the approved design remains consistent with the drawing set dated 31.8.23 (40 sheets, TP00 to TP23) prepared by R Architecture, including but not limited to variability in facade colouring, extent of curved facade elements, and the low roof and service screening profiles – developed in consultation with the Government Architect.
 - b. Final detailed plans for all roof top plant and equipment, including associated screening elements, to ensure that external plant is appropriately screened and attenuated, consistent with the overall design and materiality of the built form – developed in consultation with the Government Architect.
 - c. Final design and arrangement of carparks to service the café/perfumery and provide staff carparking (outside the hotel complex), including ancillary works (excavation/fill, retaining walls etc.) and to minimise impacts to existing vegetation developed in consultation with the Government Architect.
 - d. Final details of all external materials selection, facade systems and green infrastructure in collaboration with landscape, structural and sustainability consultants to ensure delivery of the design intent (as required in [a] above) -developed in consultation with the Government Architect.
 - e. Final detailed landscape plan with appropriate species selection – including pedestrian circulation paths and connections - that integrates and merges with built development and remains consistent with the drawing set and recommendations of the Landscape report and Masterplan dated 8 November 2024 prepared by Oxygen -developed in consultation with the Government Architect.
 - f. Final details of external light sources – subject to occupational health and safety requirements for tourist and hotel operations – to be installed and operated so as to minimise external impacts to local fauna (within the project area) and local residents (adjacent the project area).
 - g. Final detailed plans for all temporary construction components (i.e. laydown areas, works compounds, storage areas, bridges/creek crossings and any other works required to support internal site access).
 - h. Final details of the walking trail running alongside Golflinks Road (developed in consultation with the Adelaide Hills Council
 - i. Final Stormwater Management Plan including civil drawings in accordance with the Adelaide Hills Council requirements, developed in consultation with Council.

- j. Final detailed plans for ancillary infrastructure, facilities and services associated with the development including roads, stormwater, water supply, power supply, telecommunications, and waste water treatment or disposal, either within the subject site or on land elsewhere.

In relation to items (a) and (b) above, the design of each building (including external roof top plant areas) shall incorporate the recommendations of the acoustic report *Mount Lofty Golf Course Redevelopment: Revised Scheme Environmental Noise Assessment Acoustic Services* prepared by BESTEC dated 28 March 2024.

2. The proponent must, prior to the commencement of construction for each project element / stage, submit to the Minister for approval a Construction Environmental Management Plan (CEMP), prepared in consultation with the Environment Protection Authority; the Department of Environment and Water; the SA Country Fire Service; and Adelaide Hills Council. The CEMP must identify measures to manage and monitor (at a minimum) the following matters:
 - a. soil erosion and drainage management
 - b. groundwater
 - c. flora and fauna
 - d. weed and pest management
 - e. air quality and greenhouse gas emissions
 - f. noise and vibration
 - g. traffic
 - h. local community impacts

The CEMP shall include the following sub plans:

- a. Traffic Management Plan
- b. Soil Erosion and Drainage Management Plan
- c. Cultural Heritage Management Plan.
- d. Emergency Response Plan

The CEMP shall be prepared taking into consideration, and with explicit reference to, relevant *Environment Protection Act 1993* policies and guidance documents, including but not limited to:

- the Environment Protection (Air Quality) Policy 2016
- the Environmental Protection (Commercial and Industrial Noise) Policy 2023
- the Environment Protection (Water Quality) Policy 2015
- the Environment Protection (Waste to Resources) Policy 2010
- the Environment Protection Authority Bunding and Spill Management Guideline 2016
- Environment Protection Authority Handbooks for Pollution Avoidance
- the Environment Protection Authority Stormwater Pollution Prevention Code of Practice for the Building and Construction Industry 1999
- the Environment Protection Authority guideline 'Construction environmental management plan (CEMP) 2019'
- any other legislative requirements, Guidelines and Australian Standards requiring compliance

3. The proponent must, prior to the commencement of hotel operations, submit to the Minister for approval an Operational Environmental Management Plan (OEMP), prepared in consultation with the Department of Environment and Water and the Adelaide Hills Council. The OEMP must identify measures to manage and monitor (at a minimum) the following matters:

- a. stormwater management
- b. weed and pest management
- c. noise sources, including attenuation/management protocols
- d. traffic control.

The OEMP shall include the following sub plans:

- a. Emergency Response Plan
4. The proponent must, prior to the commencement of construction, submit to the Minister for approval a Native Vegetation Management, Restoration and Monitoring Plan, prepared in consultation with the Department for Environment and Water and the local Landscape Board. The plan shall include details on the management of both retained native vegetation within the golf course land and any areas that are to be restored after the completion of construction. The plan shall address:
- a. Vegetation clearance requirements of the Native Vegetation Council.
 - b. Vegetation clearance practices.
 - c. Restoration measures, such as site preparation, natural regeneration or direct seeding.
 - d. Protection and maintenance of remnant vegetation, including and the control of current / future degrading factors (especially erosion).
 - e. Vegetation maintenance during operation, especially to maintain access, safety clearance zones under conductors and asset protection zones.
 - f. Pest plant and animal control.
 - g. Fire management.
 - h. Monitoring requirements.
5. The proponent must, prior to the commencement of construction, submit a final and signed copy of an Infrastructure Agreement with the Adelaide Hills Council that details the arrangements and responsibilities for the upgrade and provision infrastructure to service the development.

This plan must include (but not be limited to) the proposed road upgrades and/or alterations to Old Carey Gully Road and Golflinks Road (as indicated in the various CIRQA reports and treatment plans dated 15 March 2024, 15 May 2024, 11 October 2024), proposed walking trail adjacent to Golflinks Road, upgrades to the local waste water pumping station (including connections to/from) and confirmation of rising main upgrade/replacement works as indicated in the FMG Report dated 20 December 2024.

All costs in the preparation of these agreements shall be met by the proponent.

Pursuant to s.48(6) of the *Development Act 1993*, the Minister for Planning reserves a decision on the form and substance of any further conditions required under this provisional development authorisation that it considers appropriate to impose in respect of the reserved matters set out at 1 to 5 above. Upon receipt of the information relating to a reserved matter, it will be assessed and if satisfactory, approved by the Minister for Planning or delegate.

PART B: GENERAL CONDITIONS

6. Except where minor amendments may be required by other legislation or by conditions imposed herein, the construction, operation, use and maintenance of the major development shall be undertaken in accordance with:

- (a) Mount Lofty Golf Estate: Development Report: Main Report and Appendices: 8 June 2023
- (b) Mount Lofty Golf Estate: Development Report: Update: 2 February 2025

To the extent of any inconsistency, a later document will prevail over an earlier one.

7. The proponent shall have substantially commenced the development within two (2) years from the date of this authorisation and substantially completed the development within five (5) years of the date of this authorisation, failing which an extension of time may be sought from the Minister for Planning (the Minister) or the authorisation may be cancelled.
8. Except where minor amendments may be required by other legislation or by other conditions imposed below, all buildings, structures and infrastructure comprised in or required for the purposes of the major development shall be constructed, used, operated and maintained in accordance with the approved final plans, drawings, designs and specifications as approved by the Minister under the reserved matters.
9. Should the development cease during the period between the commencement of earthworks and final completion, the proponent shall undertake all necessary steps to reinstate the land and make good any damage or disturbance.
10. No building or site works on any part of the major development may commence until a favorable decision has been notified to the proponent by the Minister or the Minister's delegate in respect of the reserved matters (PART A) and until a final development authorisation under section 48(2) of the *Development Act 1993* / section 115(2) of the *Planning, Development and Infrastructure Act 2017* is granted for the relevant stage or component as is approved.
11. The construction of the major development shall be undertaken in accordance with:
 - a. the final approved plans and specification of all elements;
 - b. the approved Construction Environment Management Plan (CEMP);
 - c. the approved Cultural Heritage Management Plan (CHMP);
 - d. the approved Waste Minimisation and Management Plan; and
 - e. the approved Native Vegetation Management, Restoration and Monitoring Plan.
12. The operation of the major development shall be undertaken in accordance with:
 - a. the final approved plans and specification of all elements;
 - b. the approved Operational Environment Management Plan (OEMP);
 - c. the approved Waste Minimisation and Management Plan;
 - d. the approved Native Vegetation Management, Restoration and Monitoring Plan; and
 - e. the approved Bushfire Survival Plan (BSP) and Bushfire Management Strategy (BMS).
13. The OEMP and CEMP shall be monitored by the proponent to ensure compliance with mitigation measures for the predicted impacts and shall be reviewed at regular intervals (being at least every 6 months for the first 2 years of operation) and updated as necessary.
14. Council, utility or state agency-maintained infrastructure that is demolished, altered, removed or damaged during the construction of the major development shall be reinstated to the Adelaide Hills Council, utility or state agency specifications as applicable. All costs associated with these works shall be met by the proponent.

15. All road infrastructure upgrades (as identified in Traffic Management Plan) shall be completed to the standard required to enable the use of the identified vehicle type (as specified in the Traffic Management Plan), and being to the reasonable satisfaction of the Adelaide Hills Council.
16. All road infrastructure upgrades, unless otherwise identified, are to be funded by the proponent.
17. The development shall be maintained in a serviceable condition and operated in an orderly and tidy manner at all times.
18. All vehicle car parks, driveways and vehicle entry and maneuvering areas at or providing access to and from the site shall be designed and constructed in accordance with the relevant Australian Standards and appropriately line marked, and shall be constructed, drained and paved with bitumen, concrete or paving bricks (or other such material as agreed to by the Minister), in accordance with sound engineering practice.
19. All loading and unloading, parking and maneuvering areas at or providing access to and from the site shall be designed and constructed to ensure that all vehicles can safely traffic the site and enter and exit the subject land in a forward direction.
20. All stormwater design and construction at the site shall be in accordance with Australian Standards and recognised engineering best practice to ensure that stormwater does not adversely affect any adjoining property, or public road, and being to the reasonable satisfaction of the Adelaide Hills Council.
21. All liquids or chemical substances that have the ability to cause environmental harm must be stored within a bunded compound that has a capacity of at least 120% of the volume of the largest container, in accordance with the EPA 'Bunding and Spill Management Guidelines' (2016).
22. All external lighting, including for car parking areas and buildings within the complex must be designed and constructed to conform with *Australian/New Zealand Standard AS/NZS 4282:2023 – Control of Obtrusive Effects of Outdoor Lighting* and the *National Light Pollution Guidelines for Wildlife* (DCCEEW, May 2023).
23. External lighting must be located, directed and shielded, and of such limited intensity, as far as reasonably practicable, that no unnecessary light spill will affect residents along Golflinks Road nor unreasonably impact upon native fauna.
24. "As-built" drawings of the approved and installed infrastructure shall be submitted to the Adelaide Hills Council along with certification from a professional engineer that the works for that stage have been completed in accordance with the approved design.
25. All trenches or excavation are to be reinstated to the satisfaction of the Adelaide Hills Council. All excavation, trenching of underground services and reinstatement in existing road pavements and verge areas shall be done to satisfaction of Council.
26. All approved works and infrastructure required for construction shall be constructed for the relevant stage to the satisfaction of the Adelaide Hills Council. All costs for the construction of all approved infrastructure shall be borne by the owner/proponent. Following agreement by Council that Practical Completion has been achieved the developer shall be responsible for all maintenance for a period of 12 months or such other period of time as agreed.

27. An asset register of the infrastructure constructed on Adelaide Hills Council land shall be provided in digital format to the satisfaction of the Council.
28. Any costs associated with any vegetation clearance within Council Land including costs associated with Native Vegetation Significant Environmental Benefit payments is to be the responsibility of the proponent.
29. Proposed new (or modifications to existing) vehicle driveway connection points to Golflinks Road and Old Carey Gully Road must be designed and constructed to meet relevant Australian Standards and to Adelaide Hills Council's satisfaction. The design needs to be approved by Council before any construction at the site is permitted to occur (Note: especially as one proposed connection seems unlikely to meet relevant standards for sight distance).
30. Without limiting Condition 41, the proponent shall provide an expanded Arboriculture Pre-development Impact Assessment report detailing tree management advice for any tree including impacted trees within the road verge (outside of the provided reports geographical area of scope) that could be impacted directly or indirectly by this development. Tree management advice should be provided around the following new or modified assets:
 - All buildings / structures / outbuildings, upgraded or new roadways, upgraded or new walking trail, new fencing locations, other supporting infrastructure (such as light poles), vehicle road reserve crossover locations, main service provision of underground infrastructure to the buildings and underground service provision in between all dwellings and supporting infrastructure required as part of this development.
31. Prior to any civil works or earthworks commencing on-site, tree protection zone (TPZ) measure shall be implemented in accordance with the recommendations stipulated in the Arboricultural Impact Assessment and Development Impact Report prepared by Arborman Tree Solutions. The works in relation to the tree(s), outlined in the Arborist's Report are to be undertaken simultaneously with any building works on the site.
32. All works are required to be supervised by the suitably qualified project arborist throughout the duration of the project. If any tree roots are discovered during the works, the project arborist is to assess and address accordingly. For works on Adelaide Hills Council Road reserves, notification shall be provided not less than 48 hours beforehand to ensure Council officers can be present at excavation in tree protection zones.
33. The vegetation along the fence line of the Mount Lofty Golf Estate and in particular along Mount George Conservation Park shall be recorded and inspected for at least 3 years post development ensuring weed incursion is controlled. A long-term bond with a management plan and reporting shall be undertaken.
34. Adelaide Hills Council shall be provided with reporting updates at each stage of construction.
35. Works affecting the Local Heritage Place (former perfumery) shall ensure:
 - existing stone walls are not sandblasted, as this will damage the stone and mortar. If the walls require cleaning this should be done with low pressure water and stiff bristle brush. Organic growth can be removed with a weak biocide, applied and removed in accordance with the supplier's recommendations, and paint can be stripped with a chemical stripper such as 'Peelaway';

- a moisture barrier is provided between the stone walls and the new polished concrete floor internally; and
 - the roof is replaced in either a red Colourbond to reference the original roof colour; or alternately galvanised sheet metal.
36. The Adelaide Hills Council capital connection contribution for the approved development is required to be paid prior to occupancy.
37. The proponent must, prior to the commencement of construction for each project element / stage, submit to the Minister for approval a copy of all relevant certification documentation following the assessment and certification as complying with the provisions of the Building Rules, by an accredited professional (or by a person determined by the Minister), of all building work in accordance with the provisions of the *Development Act 1993/Planning, Development and Infrastructure Act 2016*. For the purposes of this condition ‘building work’ does not include plant and equipment or temporary buildings that are not permanently attached to the land (refer to Advisory Notes below). In assessing Building Rules compliance, the accredited professional (or a person determined by the Minister) must refer to the relevant fire authority (the SA Country Fire Service) for comment and report.
38. The proponent must, prior to the commencement of construction consult with Kaurna Yerta Aboriginal Corporation (KYAC) and/or any other Traditional Owners of Aboriginal heritage within the project area to ascertain whether any Aboriginal sites, objects or remains (together, Aboriginal heritage) intersect the project area.
39. The proponent must, prior to the commencement of construction, submit to the Minister for approval a Cultural Heritage Survey, prepared by a heritage consultant, of those parts of the project area that will be subject to ground-disturbing works. The heritage survey must, at a minimum, identify and record any Aboriginal heritage, provide recommendations on how that Aboriginal heritage will be avoided and help identify areas within the project area that have a higher risk of encountering Aboriginal heritage during project activities. The proponent must use its best efforts to involve KYAC and/or any other Traditional Owners of Aboriginal heritage within the project area in the heritage survey.
40. The proponent must, prior to the commencement of construction, submit to the Minister for approval a CHMP prepared by a heritage consultant and must use its best efforts to consult with KYAC and/or any other Traditional Owners of Aboriginal heritage within the project area in developing the CHMP. The CHMP must be consistent with the Aboriginal Heritage Discovery and Avoidance Protocols developed by Attorney-General’s Department – Aboriginal Affairs and Reconciliation (AAR), in particular that:
- all Aboriginal heritage discoveries are reported to the Minister for Aboriginal Affairs through AAR as soon as practicable.
 - discoveries of potential human remains are reported to SA Police immediately upon discovery
 - in all cases, Aboriginal heritage must not be damaged, disturbed, interfered with, excavated and/or removed from the state without relevant authorisations from the Minister for Aboriginal Affairs under the *Aboriginal Heritage Act 1988* (SA) (AH Act).
41. The developer must, prior to the commencement of construction, seek advice from a heritage consultant regarding scattered trees, in particular to ascertain whether any of them are protected under the AH Act, and a summary of findings provided to the satisfaction the Department of Housing and Urban Development staff. Any trees within the project area that

are confirmed to be culturally modified trees must be reported to the Minister for Aboriginal Affairs through AAR as soon as practicable and must not be damaged, disturbed, interfered with and/or excavated without authorisation(s) from the Minister for Aboriginal Affairs under the AH Act.

42. The augmentation costs associated with the local pump station upgrade (and any associated CWMS works) shall be paid by the developer.
43. The financial requirements of the water industry entity (whether Adelaide Hills Council and/or SA Water) shall be met for the provision of water supply and sewerage services.
44. The augmentation requirements of the water industry entity (whether Adelaide Hills Council and/or SA Water) shall be met.
45. The necessary easements shall be vested to the water industry entity (whether Adelaide Hills Council and/or SA Water).
46. Vegetation management shall be established and maintained within 35 metres to the east and west of the Hotel/Golf Club Complex and within 20 metres to the north and south of the Hotel/Golf Club Complex as follows:
 - The number of trees and understory plants existing and to be established within the APZ shall be reduced and maintained such that when considered overall a maximum foliage coverage of 30% is attained, and so that the leaf area of shrubs is not continuous. Careful selection of the vegetation will permit the 'clumping' of shrubs or trees where desirable, for diversity, and privacy and yet achieve the 'overall maximum coverage of 30% in all directions.' Vegetation remaining or to be established within the APZ shall be separated by a minimum of 5m from the surrounding hazardous vegetation. Mature trees may remain within the APZ, provided canopies are not connected to the surrounding hazardous vegetation.
 - Reduction of vegetation shall be in accordance with SA *Native Vegetation Act 1991* and SA *Native Vegetation Regulations 2017*.
 - Trees and shrubs shall not be planted closer to the building(s) than the distance equivalent to their mature height.
 - Trees and shrubs must not overhang the roofline of the buildings, touch walls, windows or other elements of the building.
 - Shrubs must not be planted under trees or must be separated by at least 1.5 times their mature height from the trees' lowest branches.
 - Grasses within the zone shall be reduced to a maximum height of 10cm during the Fire Danger Season.
 - No understorey vegetation shall be established within 2 metres of the habitable buildings (understorey is defined as plants and bushes up to 2 metres in height).
 - Flammable objects such as plants, mulches and fences must not be located adjacent to vulnerable parts of the building such as windows, decks and eaves
 - The APZ shall be maintained to be free of accumulated dead vegetation.
47. Prior to the operational use of the development, a final Bushfire Survival Plan (BSP) and Bushfire Management Strategy (BMS) shall be developed in consultation with the SA Country Fire Service and then implemented to the reasonable satisfaction of the Minister for Planning.
48. Deliveries shall be restricted to the EPA stipulated day time only (i.e., after 7:00 am and before 10:00pm) Monday to Friday and after 9:00 am on Saturday and Sunday (where applicable).

49. The final building rules documentation shall demonstrate that the *Mount Lofty Golf Course Redevelopment: Revised Scheme Environmental Noise Assessment Acoustic Services* prepared by BESTEC dated 28 March 2024 has been fully adopted, or where a departure is noted, a further environmental noise assessment is undertaken to demonstrate compliance.
50. Unless otherwise specifically provided for in these conditions or otherwise agreed to in writing with the Minister, all costs necessary for compliance with these conditions shall be met solely by the proponent.

ADVISORY NOTES

- a. The proponent is advised that all conditions must be met including monitoring, mitigation and reporting requirements as detailed in relevant management plans. Failing to comply with a condition is considered a breach of the *Development Act 1993/Planning, Development and Infrastructure Act 2016*, under which this authorisation is given, and the Minister may direct the proponent to make good any breach. The Minister may also take such action as is required because of any situation resulting from the breach, including the cessation of the operation of the development.
- b. An accredited professional undertaking Building Rules assessments must ensure that the assessment and certification are consistent with this provisional development authorisation (including any conditions or advisory notes that apply in relation to this provisional development authorisation).
- c. Construction of each component of the development may commence only after a Building Rules assessment and certification has been undertaken in relation to that component and has been issued by an accredited professional undertaking Building Rules assessments, and the Minister has received a copy of the relevant certification documentation.
- d. In the event that Aboriginal heritage is discovered during construction, the developer must follow the procedures set out in the Cultural Heritage Management Plan which must be consistent with AAR's Aboriginal Heritage Discovery and Avoidance Protocols¹.
- e. The proponent is reminded of its obligations under the AH Act that it is prohibited to excavate land to uncover, damage, disturb and/or interfere with any Aboriginal heritage undersections 21 and 23 of the AH Act without authorisations from the Minister for Aboriginal Affairs.
- f. The proponent, and all agents, employees and contractors, such as construction crew, involved in the development are reminded of their obligations under section 20 of the AH Act to notify the Minister for Aboriginal Affairs through AAR of any Aboriginal heritage discoveries as soon as practicable (and SA Police immediately if potential human remains are discovered).
- g. The proponent is reminded of its obligation under the *Native Title Act 1993* whereby the proponent would need to consult with appropriate representatives of any relevant Aboriginal Groups in regard to any known sites of significance in the area and any Native Title Claims over the sea bed and subjacent lands.
- h. The proponent is reminded of its obligations under the *Native Vegetation Act 1991* and the *Native Vegetation Regulations 2017* whereby any native vegetation clearance must be undertaken in accordance with a management plan that has been approved by the Native Vegetation Council that results in a significant environmental benefit on the property where the development is being undertaken, or a payment is made into the Native Vegetation Fund of an amount considered by the Native Vegetation Council to be sufficient to achieve a significant

¹AAR will provide the proponent with its Aboriginal Heritage Discovery and Avoidance Protocols for inclusion in its CHMP.

environmental benefit in the manner contemplated by section 21(6) of the *Native Vegetation Act 1991*, prior to any clearance occurring.

- i. The proponent is reminded that, under the *National Parks and Wildlife Act 1972*, permits are required for the 'taking of protected animals', such as the capture and relocation of animals during construction and the destruction or relocation of animals during operation.
- j. The proponent is reminded of its obligations under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*, not to undertake any activity that could have a significant effect on any matter of National Environmental Significance without the approval of the Commonwealth Minister for Environment.
- k. Should the proponent wish to vary the Major Development or any of the components of the Major Development, an application to the Minister must be submitted, provided that the development application variation remains within the ambit of the Development Report and Assessment Report referred to in this development authorisation. If an application variation involves substantial changes to the proposal, pursuant to section 47 of the *Development Act 1993* / section 114 of the *Planning, Development and Infrastructure Act 2016*, the proponent may be required to prepare an amended Development Report for public inspection and purchase. An amended Assessment Report may also be required to assess any new issues not covered by the original Assessment Report and the decision made pursuant to section 48 of the *Development Act 1993*/ section 115 of the *Planning, Development and Infrastructure Act 2016*.
- l. The Minister has a specific power to require testing, monitoring and auditing under section 48C of the *Development Act 1993* / section 117 of the *Planning, Development and Infrastructure Act 2016*.
- m. Site work and building work shall be carried out only between the hours of 7.00am to 5.00pm Monday to Saturday. No works are permitted on Sundays other than those necessary for dust control, emergency works or works that cannot be carried out at any other time without causing unnecessary disruption, as may be approved by Adelaide Hills Council on written application as per EPA requirements for work of this nature.
- n. In relation to Conditions 42-44, the water industry entity may require further investigations to be undertaken to determine final requirements and costs.
- o. Pursuant to Regulation 103 of the *Planning, Development and Infrastructure (General) Regulations 2017*, a Certificate of Occupancy is required for all new buildings, excluding Class 10 structures. The Applicant must comply with all relevant requirements of Regulation 103 including a report from the relevant fire authority (SA Country Fire Service) per Regulation 103(D).
- p. SA Country Fire Service advises that whilst preliminary BAL assessments have been provided, final BAL re-assessments will be required for the hotel complex, once vegetation removal and management has been implemented.
- q. In relation to Reserved Matter 4(e), the SA Country Fire Service has advised that this plan must include the specified fuel reduced APZs around the buildings (35m to east and west and 20m north and south), including the ongoing maintenance of the APZs which specifically excludes it from re-vegetation measures.
- r. In relation to Condition 37, the SA Country Fire Service has advised that this report will need to include a Bushfire Attack Level (BAL) re-assessment to determine if the approved Asset Protection Zones have been implemented correctly to achieve BAL 19. This should be done prior to occupation of the premises.

- s. In relation to Condition 47, the SA Country Fire Service has advised the Bushfire Management Plan (BMP) should then be updated on a regular basis and clearly communicated and practiced. In developing the plan, the proponent should consider reducing operating hours and restrictions on days of heightened bushfire danger and/or bushfire events and consider including any alterations to bookings and services offered due to actual or predicted conditions during the Fire Danger Season in any booking/refund policy.

Appendix 1: Definitions and Acronyms

ACRONYM	DEFINITION
AEP	Annual Exceedance Probability
AAR-AGD	Aboriginal Affairs and Reconciliation of the Attorney-General Department
AR	Assessment Report
AS	Australian Standard
BAL	Bushfire Attack Level
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
CWMS	Councils Waste Management System
DAWE	Department of Agriculture, Water and the Environment (formerly the Department of Environment and Energy)
DEM	Department for Energy and Mining
DEW	Department for Environment and Water
DPC-AAR	Aboriginal Affairs and Reconciliation, Attorney General's Department
DIT	Department for Infrastructure and Transport
DR	Development Report
DRAINS	Distributed Rainwater and Infiltration Network Systems
EDALA	Electronic Development Application Lodgement
EFPA	Environment and Food Production Area
EIS	Environmental Impact Assessment
EMP	Environmental Management Plan
EPA	Environment Protection Authority
EP Act	<i>Environment Protection Act 1993</i>
EPBC Act	<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>
ESD	Environmentally Sustainable Development
FFL	Finished Floor Level
FTE	Full Time equivalent
GA	Government Architect
GWP	Global Warming Potential
Heritage Act	Aboriginal Heritage Act 1988 (SA)
KYAC	Kaurna Yerta Aboriginal Corporation
MGCP	Mount George Conservation Park
MNES	Matters of National Environmental Significance
MUSIC	Model for Urban Stormwater Improvement Conceptualisation
NPW Act	National Parks and Wildlife Act 1972
Noise EPP	<i>Environment Protection (Commercial and Industrial Noise) Policy 2023</i>
NVC	Native Vegetation Council
OEMP	Operational Environmental Management Plan
PIRSA	The Department of Primary Industry and Regions SA
Planning & Design Code	The Code
PLP	Pre-lodgment Panel
DHUD	Department for Housing and Urban Development
RD	Response Document (being the updated DR)
SA	South Australia
SATC	SA Tourism Commission
SA-CFS	SA Country Fire Service
SEB	Significant Environmental Benefit
SMP	Stormwater Management Plan
SPC	State Planning Commission
SPP	State Planning Policy
STEDS	Septic Tank Effluent Disposal System

The Minister	Minister for Planning
TIA	Traffic Impact Assessment
TMP	Traffic Management Plan
VPD	Vehicles per day
WAP	Water Allocation Plan
WMLR	Western Mount Lofty Ranges
WMMP	Waste Management and Minimisation Plan
WWTP	Waste Water Treatment Plant

Appendix 2: Consistency with Current Planning Policies

The assessment of a Major Development proposal only has to have regard to current planning policies, comprising State Planning Policies, Regional Plans, the Planning and Design Code, and for reference purposes, previous Development Plans (now superseded). Unlike a standard development application that needs to be in general accordance with those Code policies that relate to the development of land, a major development process is guided by more bespoke guidelines which cover a wider range of issues and requirements to be satisfied.

Repealed Adelaide Hills Development Plan

At the time the proposal was declared a major development the site was located within the Public Purpose Zone and Policy Area 69 (Recreation and Sports) of the Adelaide Hills Council Development Plan. (Consolidated 8 August 2019)

It was also located within the Mount Lofty Ranges Watershed and Catchment Areas, the Environment and Food Production Area (where further subdivision for residential purposes is prohibited) and 'High' Bushfire risk areas, with some areas also flood prone.

Public Purpose Zone.

The Public Purpose Zone Sought to accommodate community, educational, recreational and health care facilities for the general public's benefit and contributes to the desired character of the zone. Development was sought to be at a scale compatible with existing buildings and surrounding areas, demonstrating a high architectural standard, designed and landscaped to enhance the amenity of the locality. The provision of cycle, walking and horse-riding paths within an integrated system of open spaces linking adjoining areas was also encouraged.

Primarily public or private development of social benefit to the community was sought which was sensitive to the natural environment. Education facilities, community centres, recreation reserves, conservation park tourist facilities, research facilities and facilities for the aged were deemed appropriate in certain parts of the zone.

Policy Area 69: Recreation and Sports

The policy area envisaged a range of sporting, recreational, entertainment, cultural and exhibition events and associated spectator facilities and car parking facilities within a landscaped setting. Potential impacts on nearby residents, or adverse effects on other development within the Policy Area or locality, were to be avoided or minimised. New development was to predominately support multi-use activities for compatible sports. Tourism accommodation was not envisaged in the policy area, but clubrooms, recreation facilities, sports grounds and associated carparking were desired uses.

In terms of procedural matters under the previous Adelaide Hills Council Development Plan, the form of tourist accommodation proposed (and various ancillary uses) would have been 'non-complying' form of development.

The nature, complexity and potential impact of the proposal is considered beyond the scope of the traditional assessment pathway and the major development status enables a whole of government assessment.

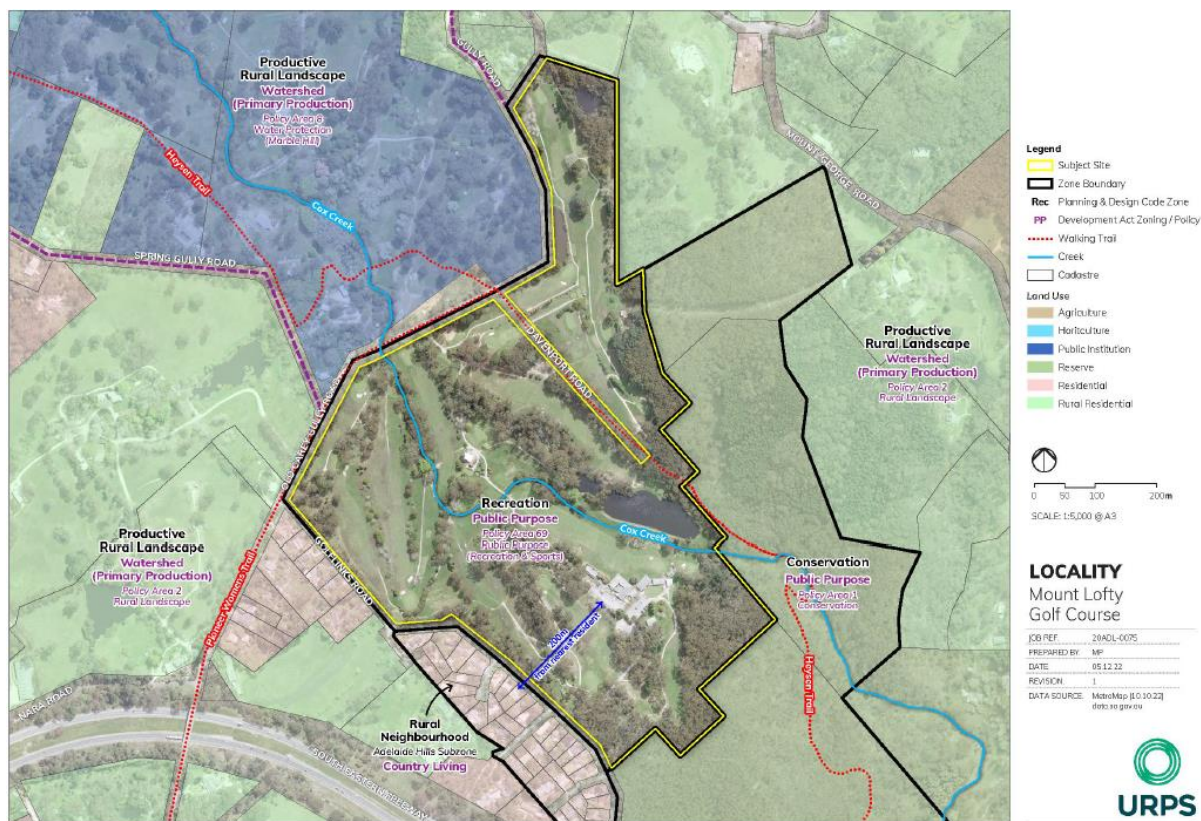


Figure 13: Development Plan Zone (Source URPS)

State Planning Policies

State planning policies (SPPs) address the economic, environmental and social planning priorities for South Australia. They are the highest level of policy in our new planning system. SPPs set the general direction for new development within the state's urban and regional areas.

The SPPs are not used for development assessment. However, they must be taken into consideration when an Environmental Impact Statement (EIS) is prepared to accompany an impact assessed development application. The EIS must evaluate the extent to which the expected effects of a proposed development would be consistent with relevant SPPs. It will also need to provide any necessary commitments regarding avoidance, mitigation or management of potentially adverse effects on any matter that may be directly relevant to a special legislative scheme.

A number of SPPs are relevant to the assessment of the proposal:

SP2: Design Quality – thoughtful planning and good design enhances places and communities, raises standards and expectations. Good design enhances connections between people and places, movement and urban form, nature and built fabric. Achieving good design is critical to build on our liveability and quality of life and capitalise on our competitive advantages at the global scale.

Comment: Objectives 2.1, 2.2 promote best practice in design of buildings and access and inclusion for universal design. Objective 2.6 seeks to maximise principles of good design and community engagement. The unique character of an area and their physical attributes should be recognised in consultation with their communities (Objective 2.8).

Principles of Good Design and Principles of Universal Design are outlined in the policy and translated into the Code provisions. The proposed development has been designed to take

into regard the principles of good design to respond to the surrounding environment, be inclusive and universal by providing equitable access, is durable by creating buildings fit for purpose, creates value by promoting local investment, performance by realising the potential benefit of users and the broader community and is sustainable by being environmentally responsible.

SP3: Adaptive Reuse - Adaptive reuse of buildings, sites and places in rural settings can have cultural, social, economic and environmental benefits. Adaptive reuse includes the preservation of historically or architecturally significant buildings and also renewed vitality to any building that may be underused, abandoned, vacant, dilapidated or functionally obsolete.

Comment: *Objectives 3.3 seeks the repurpose, adaptation and reuse of historical buildings and places that recognise and preserve our state's history. The development satisfies this by adaptive reuse of the local heritage perfumery building into a bespoke function facility.*

SP4: Biodiversity – the maintenance of a healthy, biologically diverse environment ensures greater resilience to climate change, increases productivity and supports a healthy society. The Planning System has a role to play in ensuring biodiversity and associated life-supporting functions are maintained and enhanced through the identification and protection of areas of high biodiversity value, ensuring development occurs in appropriate locations, and assessing the cumulative impact of development on biodiversity, including spatial, temporal and incremental impacts.

Comment: *Objectives 4.1 seeks the minimisation of impacts on areas with recognised natural character and values, such as native vegetation and critical habitat so that critical life-supporting functions to our state can be maintained. Objective 4.2 recognises the values of modified landscapes and allow appropriately scaled development that can co-exist with biodiversity values. Where impacts to biodiversity cannot be avoided (Objective 4.5), these impacts should be minimised and where possible, offset. Nature-based tourism and recreation is encouraged that is compatible with, and at an appropriate scale for, conserving the natural values of that landscape (Objective 4.6)*

The development is associated with nature-based tourism and is proposed to avoid, manage and/or mitigate environmental impacts through siting the buildings on disturbed areas, minimising clearance where possible and construction management. An offset payment will also apply under the Native Vegetation Act.

SP5: Climate Change – seeks to build resilience within our built and natural environment through the adaption and mitigation of the impacts of climate change. The Planning system has a role to play in supporting new infrastructure that can lower our carbon footprint (either directly or indirectly) and encourages the adoption of new technology.

Comment: *Objectives 5.3 and 5.4 seeks to facilitate climate-smart buildings to reduce demand for water and energy and to mitigate the impacts of rising temperatures by encouraging water sensitive urban design, green infrastructure and other design responses. Development should be avoided in hazard-prone areas and if unavoidable, it should ensure risks to people and property are mitigated to an acceptable or tolerable level through cost-effective measures (Objective 5.5). Areas that provide biodiversity and ecological services are to be protected and enhanced to maximise opportunities for carbon storage (Objective 5.7). Objective 5.10 supports the transition of traditional industries that rely on fossil fuels to climate smart initiatives to reduce greenhouse gas emissions. The Mount Lofty Golf Course development encompasses energy efficient measures and associated landscaping and*

retention of vegetation where possible to minimise its impact on the natural environment and carbon emissions.

SP7: Cultural Heritage – the enduring, living, spiritual and cultural connection to the land is recognised and acknowledged as an essential part of our cultural heritage. The planning system has a role to play by protecting places of recognised heritage value through early identification and avoidance – particularly those places, items and objectives of significance for South Australia’s First Peoples. Opportunities should be found to restore and maintain heritage places. Such places are of importance to the community.

***Comment:** Objective 7.1 seeks the sensitive and respectful use of our culturally and historically significant places and Objective 7.2 seeks to recognise and protect Indigenous cultural heritage sites and areas of significance, whilst Objective’s 7.3 and 7.4 seek to recognise, protect and maintain such places for the community and future generations more generally. Objective 7.5 seeks the implementation of appropriate design guidance to maintain heritage values.*

The Proponent advises they will seek to avoid areas of cultural heritage significance, although further consultation with the Kurna Yerta Aboriginal Corporation (KYAC) and/or any other Traditional Owners or group should be undertaken through the construction process and removal of the scattered trees.

Furthermore the Proponent should develop a Cultural Heritage Management Plan (CHMP) in consultation with KYAC and other Traditional Owners to avoid heritage impacts and to stop works if any discoveries of Aboriginal heritage are made during Project construction.

SP9: Employment Lands – the planning system aims to support the diversification of the economy and remove barriers to innovation. It is critical that the right signals are sent to the market to attract interest, investment and tourism opportunities across South Australia.

***Comment:** Objective 9.9 seeks sustainable tourism developments where the social, cultural and natural assets are protected in line with sustainability principles. This is further enhanced by Objectives 9.1 and 9.4 where the expansion and clustering of key economic growth areas including tourism are supported with adaptable policies that allow employment lands to support local economies and evolve in an environment of changing business and community. The proposal is consistent with these objectives, being underpinned by recreational and nature-based tourism where the social, cultural and natural assets, on the whole, are proposed to be retained.*

SP11: Strategic Transport Infrastructure – the integration of land use policies with existing and future transport infrastructure, services and functions to preserve and enhance safe, efficient and reliable connectivity for people and business.

***Comment:** Objective 11.1 seeks the facilitation of an efficient, reliable and safe transport network that connects business to markets and people to places and objective 11.4 seeks to minimise negative transport-related impacts on communities and the environment. The proposal utilises the existing road network, which is intended to be upgraded although is currently able to accommodate the proposed increase in traffic movement for the new facility.*

SP14: Water Security and Policy – Access to a safe and reliable water supply is essential to support our communities and our water dependent ecosystems also rely on access to water to continue to provide cultural, aesthetic, amenity, recreational and tourism benefits. It is therefore vital that we continue to protect and plan for our water now and into the future.

Comment: Objectives seek the protection of the state's water supply to support a healthy environment. Objective 14.2 seeks the protections of water supply catchments including the Mount Lofty Ranges. Development should include water sensitive urban design principles to include the management of risks to water quality (objective 14.5) and the adoption of an integrated water management approach. The site is located within the Mount Lofty Ranges water catchment area and is in a sensitive environment. The quality of water protection measures has been considered in the assessment of the proposal and is considered to meet these objectives.

SP15: Natural Hazards – natural hazards are an integral part of the South Australian landscape and have the potential to impact on people, property, infrastructure, our economy and the environment. We need to plan for and mitigate risks from these hazards. Sound planning and development decisions, together with disaster reduction strategies, can help reduce the severity and impact of natural hazards. This approach can also help support the activities of emergency services and public safety agencies and build the resilience of affected communities. The planning system can be used to prevent development in areas of known high risk and ensure that appropriate design standards are in place to prepare new developments in places that are exposed to acceptable levels of risk.

Comment: objectives seek to identify and minimise risk to people and property from exposure to natural hazards, including extreme heat, bushfire, soil erosion. Development should be developed in accordance with a risk hierarchy of 'avoid', 'accommodate' and 'adapt'. (objectives 15.1, 15.2, 15.3, 15.4). Objective 15.6 seeks the avoidance of development in high or extreme hazard risk areas (such as bushfire risk areas) that will necessitate the removal of native vegetation. The development site is located in a high bushfire area with significant native vegetation. These factors has been carefully considered in the assessment of the proposal and is able to meet these objectives.

Summary: The proposal is generally consistent with the SPP and the economic opportunities sought, whereby tourist accommodation is developed on land in association with an existing recreational land uses. The development is located in a scenic area in the Adelaide Hills and has the potential to attract interest, investment and tourism opportunities across South Australia. Given the size of the site the development is suitably setback from public areas so as to minimise interface impacts. The development is located on an already modified area and is designed to be sympathetic with the topography of the land and the environmental hazards can be appropriately mitigated through the design and management of the facility. The upgrade to the roads will accommodate expected vehicle and pedestrian movements.

Regional Planning Policies

Each region in South Australia has a plan to both guide development and reflect the vision of the State Planning Policies. Regional plans set the direction for future planning and development of South Australia. The current (operative) plan is the Greater Adelaide Regional Plan (GARP).

The GARP sets out a long-term vision for Greater Adelaide, detailing where people will live and work, how they will move around and where they will access services. The plan makes recommendations for managing growth and adapting to changes in our community and urban environment. Key points in the respective plan include:

Greater Adelaide Regional Plan (GARP)

The current regional plan for the subject site is the Greater Adelaide Regional Plan (GARP), released on 17 March 2025. The GARP sets out the long-term vision for Greater Adelaide, identifying land use and infrastructure requirements over the next 30 years.

There are two types of Mapping Layers, being Primary (spatially implement State Planning Policies and seek to provide direction about future land use changes) and Reference (contains material that assists in considering strategic opportunities, constraints or contextual information that can help in making decisions about long-term land use and infrastructure planning).

The GARP does not identify a primary mapping layer and therefore no changes to the land use for the Stirling Golf Course are envisaged. The adjacent land is identified as existing 'Primary Industry Lands'.

The following Primary Themes apply to the site, providing direction about future land uses:

- The Environmental and Food Production Area - which identifies areas that protect vital agricultural lands surrounding metropolitan Adelaide from urban encroachment.
- Existing Scenic Landscapes - which are areas that have high scenic value or cultural qualities that should be preserved.
- Bushfire - High Risk – which areas where there is a high risk from bushfire and essential infrastructure or increases to people living or working should be avoided where possible.
- Water Resources – which identifies land around watercourses and waterbodies where the quality of surface water should be protected and natural flow paths maintained.
- Mass Transit Corridor Investigation Area – which identifies areas that will be investigated to establish an infrastructure reserve for Mass Transit.
- Local Heritage Place – which identifies local heritage places that should be maintained through conservation, ongoing use, and adaptive reuse.
- Open Space Network – Greenways (at the edge of the site – Heysen Trail and along Golflinks Road) - identifies corridors (public and private) that provide opportunities to link people and fauna to green spaces and provide future opportunities for walking and cycling.

The following Reference layers apply to the site:

- SAPN Overhead High, low and underground Voltage Lines – which identifies areas location of electricity transmission lines.
- Native Vegetation – which identifies where native vegetation is protected under the Native Vegetation Act 1991.
- Waterbodies and Watercourses – which identifies creeks, rivers and lakes that should be protected and enhanced to improve water quality and maintenance of natural flow paths (reference layer).
- Existing Water Protection Areas – which identifies areas defined under the Environment Protection Act 1993, which seeks to safeguard SA's public water supplies (reference layer).
- Native Title Claims – which identifies Prescribed Body Corporates that are the first point of contact for government or other parties who wish to talk to Native Title holders or undertake activities on Native Title land.

Summary: The GARP does not specifically identify any policy or land use changes to the site, and it is therefore determined that the recreational land use with associated tourist accommodation continues to be relevant for the future direction of the site. The relevant primary themes and references in the GARP are entirely consistent with the Code provisions, whereby natural resources, environments and landscapes are of primary importance, given the site's location in a high quality landscape area. Water protection, bushfire hazards, protection of native vegetation, local heritage and landscaped areas are of primary importance, as also identified in the Code.

Planning and Design Code (the Code)

The Mount Lofty Golf Estate development area (being the Stirling Golf Course) is within the Adelaide Hills Council area. At the time the project was declared as a major development under the *Development Act 1993*, the Planning and Design Code was not implemented (which occurred on 19 March 2021).

The Development Plan in force at the time of declaration was the Adelaide Hills Development Plan (Consolidated 8 August 2019). However, as the assessment of the proposal commenced after the implementation of the Code, the application has been considered in the context of the new planning system.

The subject land is within the Recreation Zone under the Code. The hierarchy of policies is such that the provisions of an overlay will prevail over all other policies; a subzone policy will prevail over a zone policy or a general development policy; and a zone policy will prevail over a general development policy.



Figure 14: Planning and Design Code – Subject land and zoning

Recreation Zone

The land is in the Recreation Zone which envisages a range of accessible structured, unstructured, active and / or passive recreational facilities. The anticipated uses include:

- Golf course
- Recreation area (no floor area specified)
- Tourist accommodation ancillary to recreational facility
- Lighting for night use of facilities
- Office ancillary to recreational facility
- Shop ancillary to recreational facilities
- Special event
- Spectator viewing structure
- Sporting clubrooms
- Sporting ovals and fields
- Stadium
- Car parking

Policies specifically seek tourist accommodation, provided it is of a scale that is subordinate to the principal recreational use of land and is complementary to the facilities associated with the principal use of the land. Shops including restaurants and offices are also envisaged provided they are of a scale that is subordinate to the principal recreational use of land. The gross leasable floor area is not expected to exceed 80m². Shops that exceed 1000m²; and a shop that is a restaurant are restricted forms of development.

Buildings, landscape and streetscape design elements should be of a high visual amenity particularly along public roads and open spaces and be designed to manage visual impacts and overshadowing. The policies seek a setback of 8m from a public road or adjoining sensitive land uses.

Land divisions that supports the provision of recreational facilities is supported.

Overlays

The following overlays apply to the site:

- Environment and Food Production Area (EFPA):
The EFPA Overlay is an area of rural, landscape, environmental or food production significance within Greater Adelaide that is protected from urban encroachment
- Hazards (Bushfire - High Risk) The Hazards (Bushfire - High Risk)
The Overlay seeks to ensure development responds to the high level of bushfire risk by siting and designing buildings to mitigate threat and impact of bushfires on life and property, facilitating access for emergency service vehicles and situating activities that increase the number of people living and working in the area away from areas of unacceptable bushfire risk.
- Hazards (Flooding - Evidence Required)
The Overlay adopts a precautionary approach to mitigate potential impacts of potential flood risk through appropriate siting and design of development.
- Local Heritage Place - 15127

The Overlay seeks to maintain the heritage and cultural values of Local Heritage Places through conservation, ongoing use and adaptive reuse.

- Mount Lofty Ranges Water Supply Catchment (Area 2)

The Overlay is to protect Adelaide's drinking water supply by limiting development to that which has a beneficial impact on the quality of water harvested from the Mount Lofty Ranges Watershed

- Native Vegetation

The Overlay seeks to protect, retain and restore areas of native vegetation.

- Prescribed Water Resources Area

The Overlay seeks to ensure the sustainable use of water in prescribed water resource areas.

- State Significant Native Vegetation

The Overlay seeks to protect, retain and restore significant areas of native vegetation.

- Traffic Generating Development

The Overlay aims to ensure safe and efficient vehicle movement and access along urban transport routes and major urban transport routes.

- Water Resources

The Water Resources Overlay seeks to protect the quality of surface waters in South Australia.

General Development Policies

Tourism development is encouraged to be built in locations that cater to the needs of visitors and positively contributes to South Australia's visitor economy and complements and contributes to local, natural, cultural or historical context. Tourist accommodation is sought where it supports immersive natural experiences or showcases South Australia's landscapes and produce and events and functions which are connected to local food, wine and nature.

Policies seek tourism development comprising multiple accommodation units (including any facilities and activities for use by guests and visitors) to be clustered, to minimise the environmental and contextual impact.

Recreation facilities are to be compatible with surrounding land uses and activities. Open space and recreation facilities are to link habitats, wildlife corridors and existing open spaces and recreation facilities.

Design provisions seek a high-quality development that is contextual, durable, inclusive and sustainable. The following design related provisions are of note:

- Mechanical plant, outdoor storage, waste management and loading service areas integrated into the building design to minimise visual impacts to adjoining residents, including overlooking and overshadowing.
- Development incorporates crime prevention in design solution – with differentiation between public, communal and private areas, passive surveillance of communal areas, provision of clear sightlines, lighting and permeable screening.

- Incorporation of soft landscaping and tree planting to minimise heat absorption and reflection - to maximise shade and shelter and stormwater infiltration and enhance the appearance of land and also contribute to biodiversity. Local indigenous plant species are encouraged with plant species best suited to current and future climate conditions, avoiding pest plant and weed species.
- Environmental performance with reduced reliance on mechanical systems. This includes orientation for access to natural sunlight and ventilation for habitable areas and open spaces; use climate responsive techniques and water sensitive design features and dedicated on-site effluent disposal areas.
- Vehicle parking areas designed and constructed to minimise impacts on adjacent sensitive receivers including measures such as landscaping, screening. When outdoors they should incorporate stormwater management techniques and soft landscaping.
- Earthworks minimised, including any associated driveways and access tracks, to limit disturbance to natural topography.
- Interface between land uses is to be considered to ensure development is located and designed to mitigate adverse effects on neighbouring uses and sensitive receivers. Development should not unreasonably impact their amenity through hours of operation, noise emissions (including music), traffic, maneuvering of cars, service and delivery vehicles, location of plant and equipment, air quality, light spill, solar reflectivity/glare and electrical interference.
- A comprehensive, integrated and connected transport system that is safe, sustainable, efficient, convenient and accessible to all users and minimises impact or interruption on the operation of public roads. Sightlines at intersections for motorists, cyclists and pedestrians are to be maintained or enhanced to ensure safety for all road users and pedestrians.
- Land Division should create allotments with the appropriate dimensions and shape for their intended use.

Appendix 3: Assessment Guidelines

For reference purposes, the Assessment Guidelines are available from the Plan SA Website here: https://plan.sa.gov.au/data/assets/pdf_file/0016/1056220/Mount_Lofty_Golf_Estate_-_Guidelines.pdf

www.plan.sa.gov.au

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