

Greater Adelaide Regional Plan Discussion Paper

Landowner Submissions

DTI:PlanSA Submissions

From: Michael Dickson [REDACTED]
Sent: Monday, 6 November 2023 2:30 PM
To: DTI:PlanSA Submissions
Cc: Marc Duncan
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP Submission Final.pdf

Follow Up Flag: Follow up
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Hi,

Please see **attached** submission to the Greater Adelaide Regional Plan Discussion Paper for consideration, on behalf of 27 DQV Pty Ltd (owner, 27 Dequetteville Terrace, Kent Town).

MICHAEL DICKSON
Senior Consultant



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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November 6, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001

Via email: plansasubmissions@sa.gov.au

SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for 27 DQV Pty Ltd, the owner of 27 Dequetteville Terrace, Kent Town ('the Land') and also the Proponent for the 27 Dequetteville Terrace, Kent Town Code Amendment ("the Proponent"). We prepare this submission on the Greater Adelaide Regional Plan ('GARP') Discussion Paper on behalf of the Proponent.

The Land is located on a key gateway to the Adelaide Central Business District (the CBD) and is within the Urban Corridor (Boulevard) Zone. The Land is currently used for short term accommodation (66 rooms) within two, two storey, cream brick buildings identified in **Figures 1.2, 1.3** and **1.4**. The Land is currently underutilised, with the existing use not representing the highest and best use for such a prominent site.



Figure 1.1 *The Land*



Figure 1.2 View of the Land from Bartels Road intersection



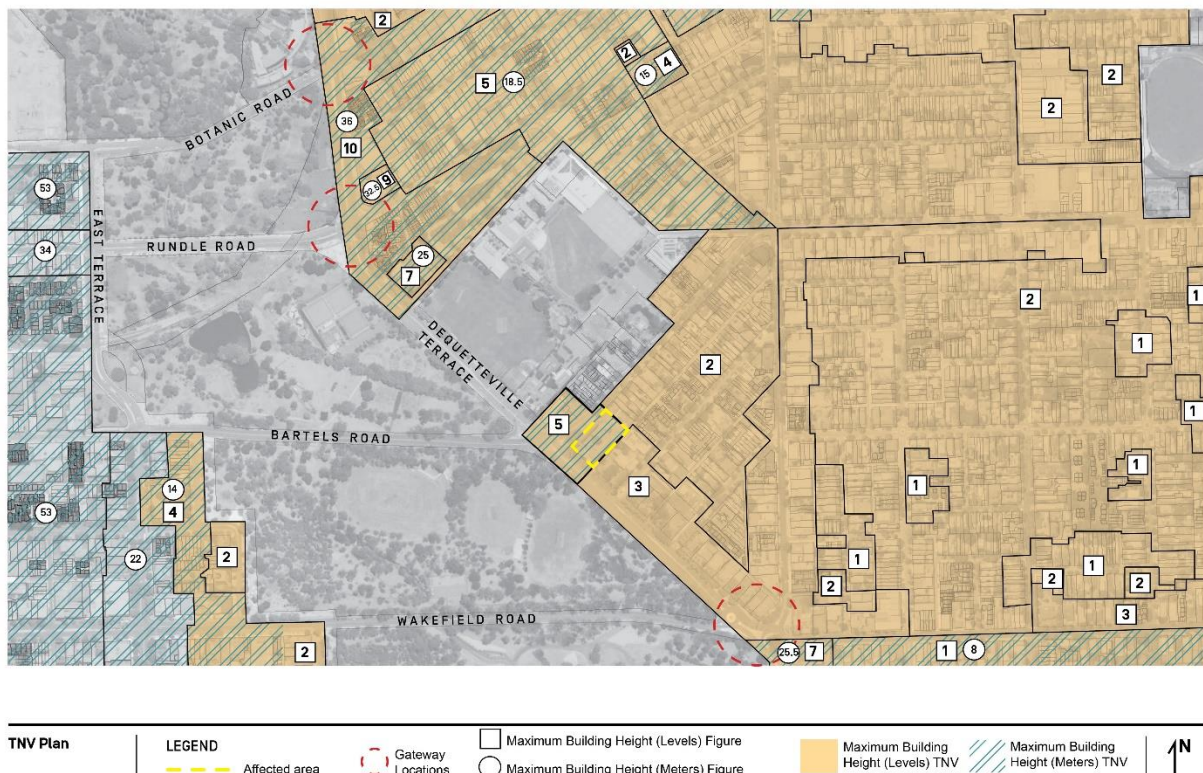
Figure 1.3 View of the Land from Dequetteville Terrace



Figure 1.4 View of the Land from Flinders Street intersection

There are a number of other key gateway sites on the eastern side of the CBD at Botanic Road/North Terrace, Rundle Road and Wakefield Road. These sites are also within the Urban Corridor (Boulevard) Zone but have a maximum building height Technical and Numerical Variation (TNV) of 10 building levels and 7 building levels, respectively refer **Figure 1.5**.

Figure 1.5 Current Maximum Building Heights (TNVs) and Gateway Locations



The Land currently has a maximum building height TNV of 5 building levels and 18.5 metres. This is inconsistent with the other gateway locations as demonstrated in **Figure 1.5**.

The current maximum height TNV that applies to the Land limits the development opportunities that would otherwise exist for the Land in a sought after and well serviced location.

It is noted the GARP does not identify the Land, nor curiously the extension of Flinders Street through to the Parade as an area identified as a “proposed area for investigation” for strategic infill and corridor growth. We submit this is an error and should be included for consideration with an investigation of the maximum development potential for the Land undertaken.

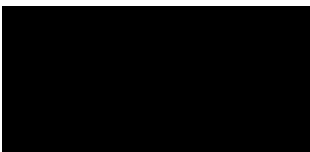
Accordingly, we respectfully request that 27 Dequetteville Terrace, Kent Town is recognised for future proposed investigation in the GARP, more particularly the policies in the Corridor as it applies to the Land are consistent with other strategically important gateway sites.

The Land should be specifically identified for further investigation in the GARP as it is a prime candidate to increase land supply in an area of high amenity and demand¹ which is well serviced by infrastructure such as roads and utilities and has access to the Adelaide Park Lands. Increasing the height will facilitate future development of the Land and also present a significant opportunity to improve the public realm through design, interface between land uses and streetscaping.

In addition, the State Government’s *Inner Rim Structure Plan (2012)* (the Structure Plan), while dated, contains many concepts that are still relevant. The Structure Plan identifies the Land as a ‘Park Land Activity Point’, with a vision to promote safe and legible points of access between the Park Lands and surrounding neighbourhoods to facilitate pedestrian and cycle movement.

We commend the Urban Infill Growth targets of the Government and the continued investigation of areas suited to this type of development to provide more affordable housing in desirable areas. We do however, respectfully submit the policies in Corridors should be consistent and this aspect of planning policy should be further investigated.

Yours sincerely,

A solid black rectangular box used to redact the signature of Marc Duncan.

Marc Duncan
Director

¹ City of Norwood Payneham & St Peters, Kent Town Economic Growth Strategy 2020-2025 (page 14) identifies “that due to its inner city location, there is a significant demand for apartments in Kent Town and that progressively over time significant redevelopment in Kent Town will occur in the areas designated as an Urban Corridor Zone.

6 November 2023

Attention: Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001

Via email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER SUBMISSION – HILLS FACE ZONE

Thank you for the opportunity to provide this submission in response to the 'Greater Adelaide Regional Plan – Discussion Paper' (GARP). We appreciate the chance to communicate with the State Planning Commission (SPC) and the genuine engagement with stakeholders and the community to inform the preparation of the next Regional Plan for Greater Adelaide.

1. Background and Subject Land

Our client Adelaide Development Company (ADC) is one of South Australia's leading developers of residential property including the creation of residential estates at Blackwood Park, Hallett Cove and Flagstaff Hill.

The Flagstaff Pines residential estate on land at Flagstaff Hill and O'Halloran Hill was established approx. 15 years ago across moderately sloping land accessible from Flagstaff Road. Allotment sizes in the order of 500m² – 700m² have been developed with predominately detached dwellings, consistent with the 'Hills Neighbourhood Zone' in which the land is located. Flagstaff Pines proved to be a popular residential infill project with the location offering a high amenity environment and good access to services, schools and public transport.

The land surrounding the Flagstaff Hill estate to the north and west is within the 'Hills Face Zone' (HFZ). A large portion of this land, comprising approx. 58 hectares, is owned by ADC (under the entity name 'Reservoir Grazing Co.') as illustrated in **Figure 1-1**.

More specifically the land of interest is identified as follows:

- Lot 70 Main South Road O'Halloran Hill (CT 5922/249);
- Lot 508 Tolcairn Crescent, Flagstaff Hill (CT 5104/687); and
- Lot 508 Tolcairn Crescent, Flagstaff Hill (CT 6047/835).

ADC also own the land comprising the 'Suburban Activity Centre' (SAC) located on the eastern edge of Flagstaff Pines. ADC intend to develop this Local Centre in the coming years.

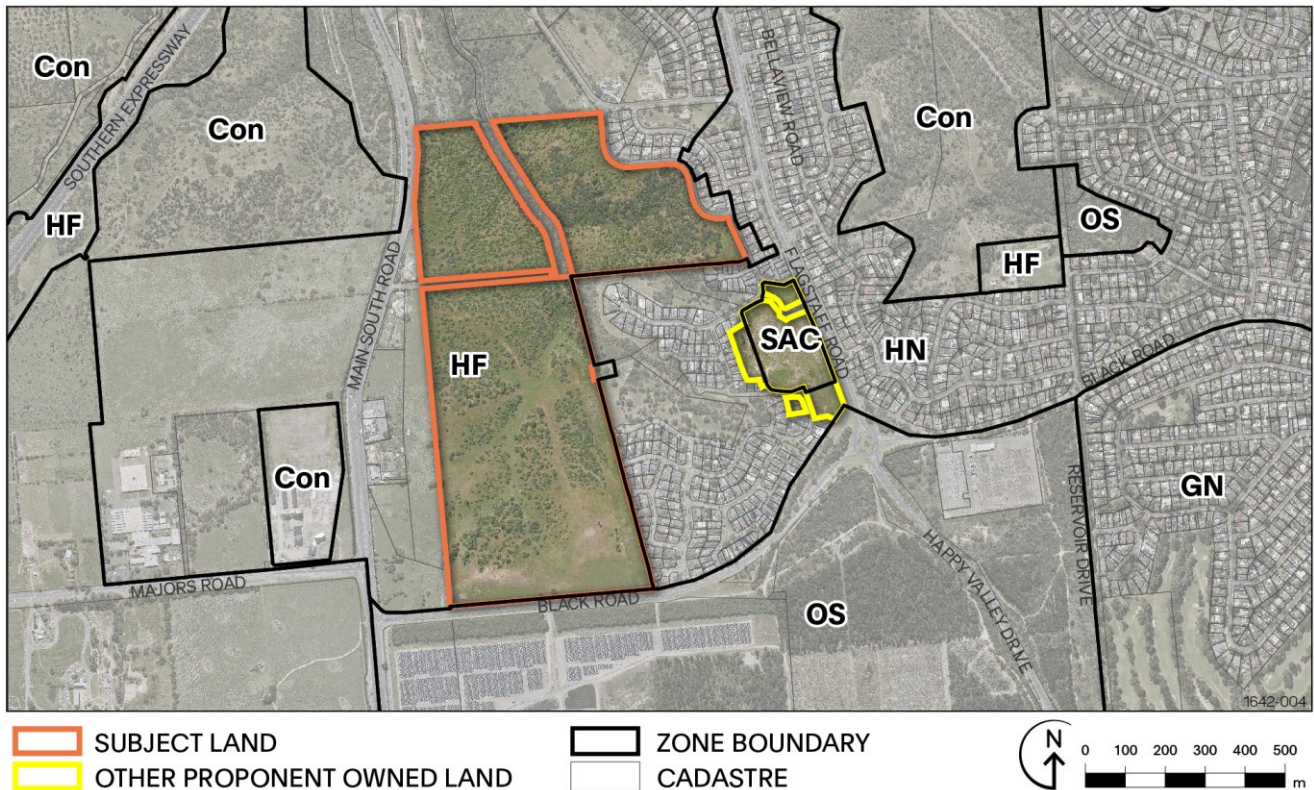


Figure 1-1 – Subject Land

ADC recognises the protected nature of land within the HFZ and the importance it plays as a natural backdrop to the Adelaide Plains. However, ADC consider that there is a need to undertake a review of certain areas of the HFZ and that it would be timely to create a set of strategic criteria against which land in the HFZ can be assessed in appropriate circumstances.

In putting forward this request, we acknowledge that, as expressed in the GARP Discussion Paper, the Commission does not intend to review the HFZ as part of the GARP investigations.

Notwithstanding, ADC are keen to initiate a discussion with the Commission regarding the HFZ and the potential for a select review of certain less sensitive portions of this zone, such as that indicated in O'Halloran Hill and Flagstaff Hill.

2. Strategic Planning Considerations

We understand that the primary objective of the Hills Face Zone provisions in the 1962 Metropolitan Development Plan was the “preservation and enhancement of the natural heritage values of the western face of the ranges and the protection of the natural backdrop to the city of Adelaide” (Pate & Smith, 2006).

The western slopes of the Mount Lofty Ranges from the north and stretching to the southern areas of Belair, Blackwood and Eden Hills are well recognised for their steep gradient and natural, predominantly native vegetation, forming a highly visible backdrop to the Adelaide Plains.

However, further south-west, the elevation of the hills reduces as the Ranges meet the ocean at Marino and Hallett Cove.

These elevation changes are illustrated in Figure 2-1

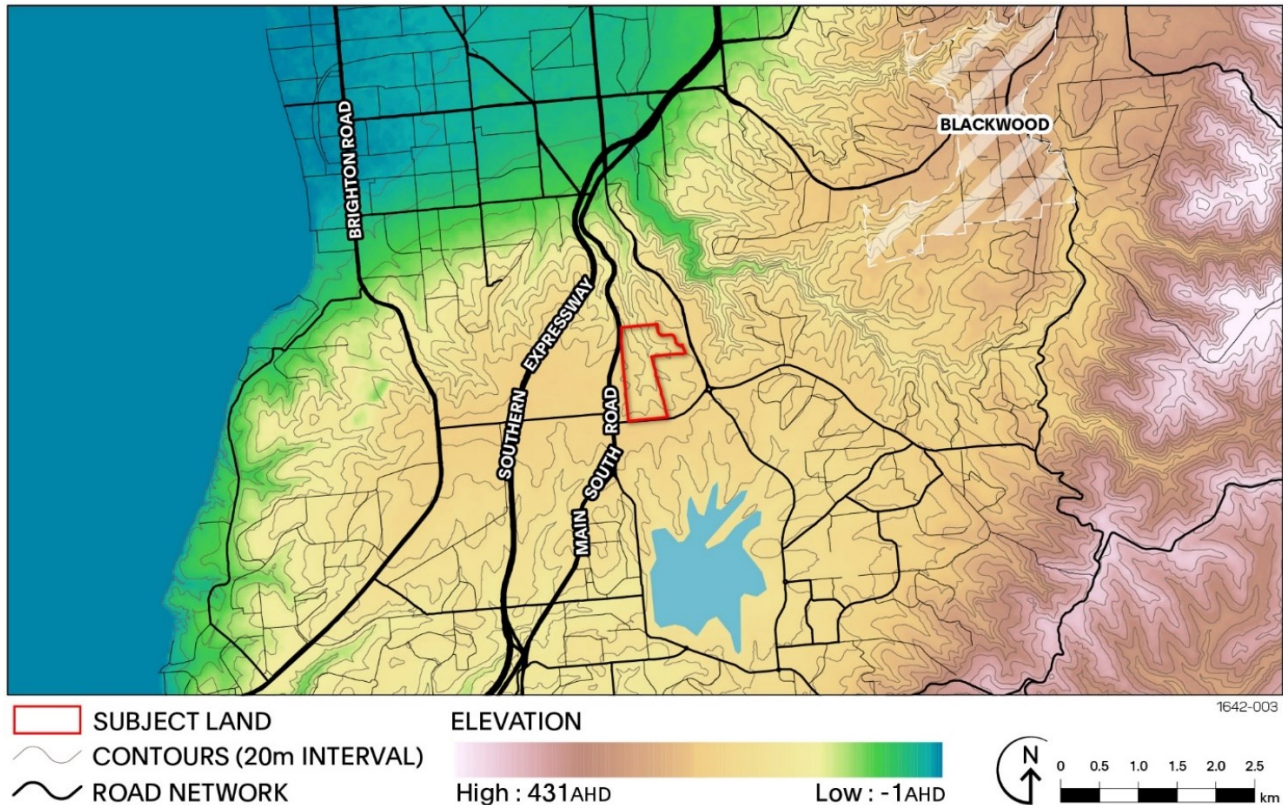


Figure 2-1 – Elevation across the south-western slopes of the Mount Lofty Ranges

Since the creation of the HFZ in the mid 1960's, to our knowledge there has been little in the way of planning reviews or land audits undertaken in relation to the condition and contribution of land in the HFZ. The last known detailed review was the 2003 'Hills Face Zone Issues and Directions Report' prepared by (the former) Planning SA Department over 20 years ago. As mentioned, the vast majority of the zone comprises land, which is undulating to steeply sloping, pastured or highly vegetated and generally visible from the plains. Understandably, and for good reason, the vast majority of the existing HFZ should continue to be protected given its aesthetic, environmental and in some cases, cultural qualities.

However, ADC's suggested review relates to the south-western periphery of the Zone, which in the case of ADC's land (at O'Halloran / Flagstaff Hill), comprises vast sections of land that does not necessarily meet or demonstrate these typical HFZ qualities.

As indicated in the following Figure and Photos, much of ADC's Hills Face Zone land at O'Halloran / Flagstaff Hill comprises modestly sloped grazing land which by all accounts has the same visual and topographic qualities as the land which now accommodates Flagstaff Pines, located within the 'Hills Neighbourhood Zone'.

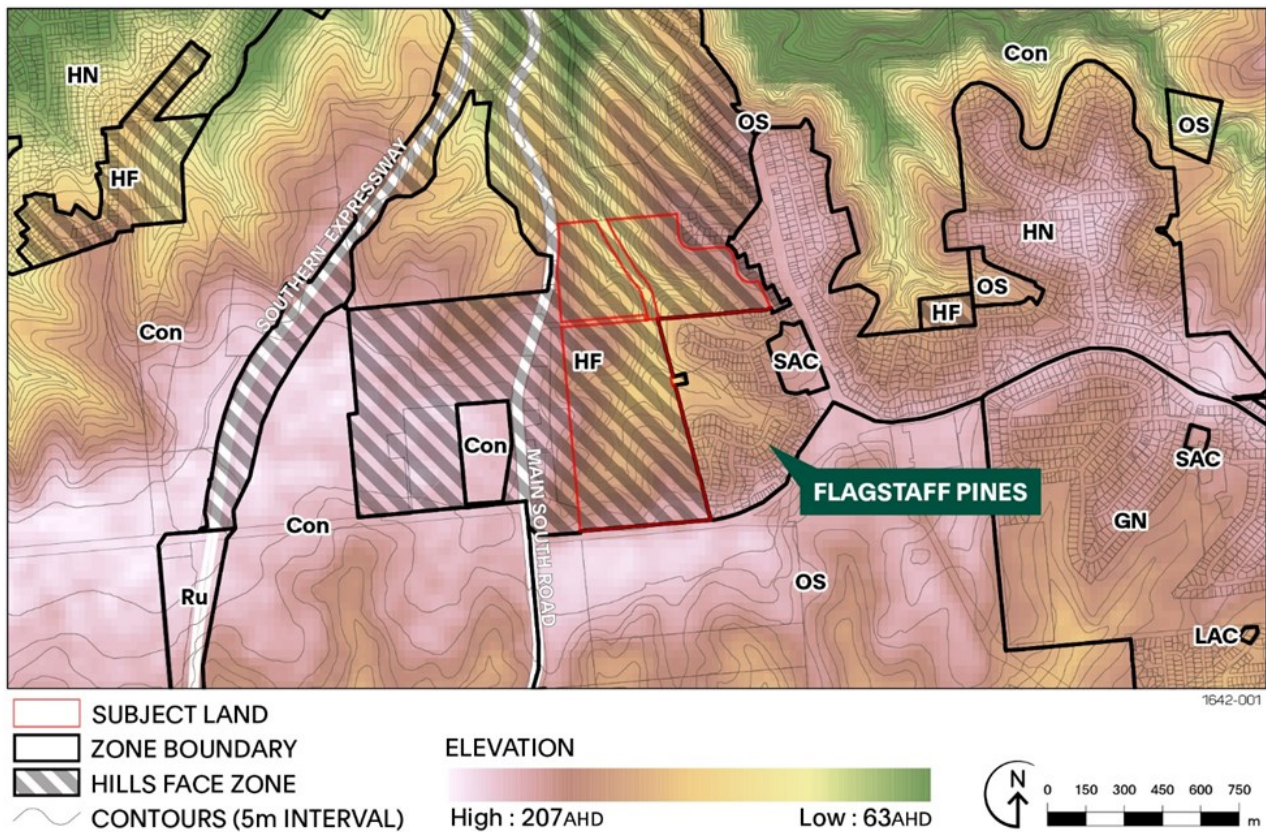


Figure 2-2 – Elevation across the locality and site





Figure 2-3 Images of ADC's Hills Face Zone land – O'Halloran Hill and Flagstaff Hill

In addition to the topography and lack of visual backdrop qualities, we also note that this land is not located within the following Planning and Design Code Overlays:

- Character Preservation District (CPD) Overlay;
- Environment and Food Production Area (EFPA) Overlay; or
- State Significant Native Vegetation Overlay.

The CPD and EFPA boundaries are illustrated in the image below which also highlights that the south-western end of the HFZ suggested for investigation by ADC, is the only area of this zone which is not protected by such Overlays.

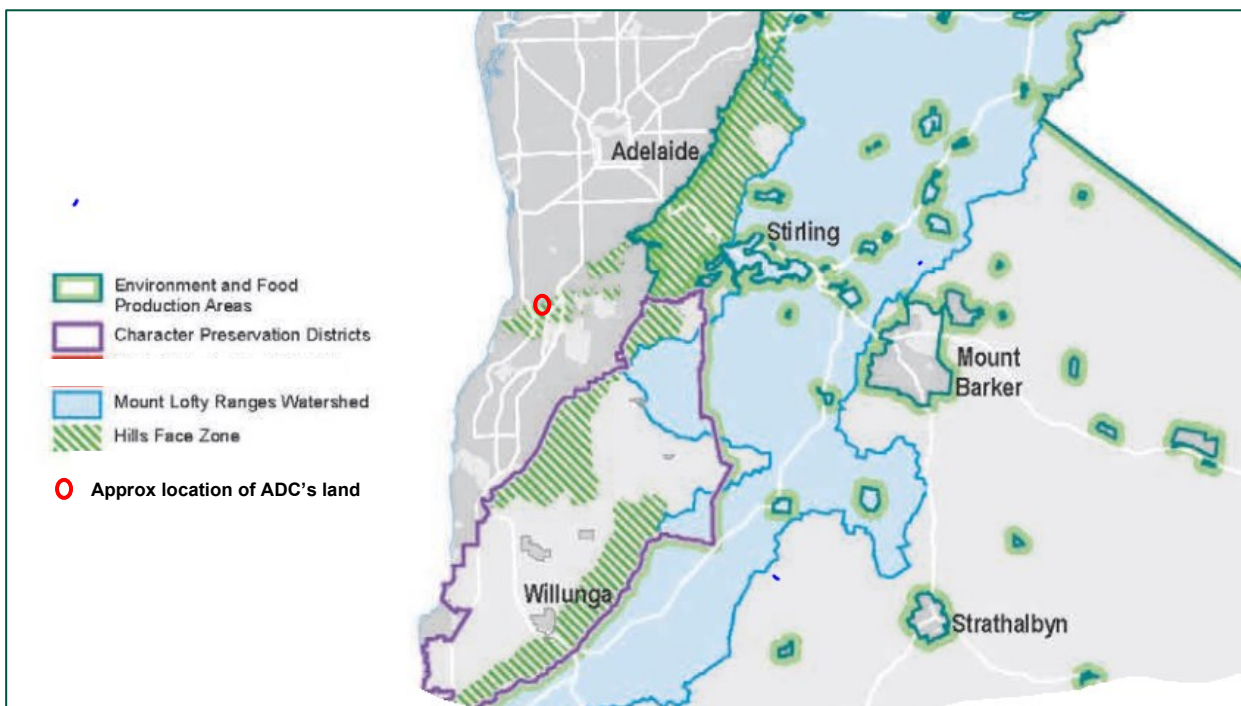


Figure 2-4 Extract of Map 5 – EFPA, GARP Discussions Paper, 2023

In terms of serviceability, the land is well catered for by infrastructure. Being within close proximity of existing suburban areas of Flagstaff Hill and nearby Aberfoyle Park, the area is well provided for by shops, community facilities, schools, childcare and the like. The land is 5km to Flinders Hospital, Flinders University and Westfield Marion Shopping Centre.

The land will become even more accessible when the proposed Majors Road upgrade and new on and off ramps are completed in 2025. As outlined in the Department for Infrastructure and Transport (DIT) project details, Majors Road is an important arterial road, providing a key connection between Lonsdale Road and Main South Road. Majors Road currently carries approximately 13,200 vehicles per day. The Southern Expressway carries approximately 74,000 vehicles per day between Darlington and the Reynella interchange and supports economic activity in Adelaide's southern commercial and industrial areas, and facilitates tourist travel on the Fleurieu Peninsula.

The proximity of the site to the Southern Expressway and Majors Road is illustrated in Figure 2-5.

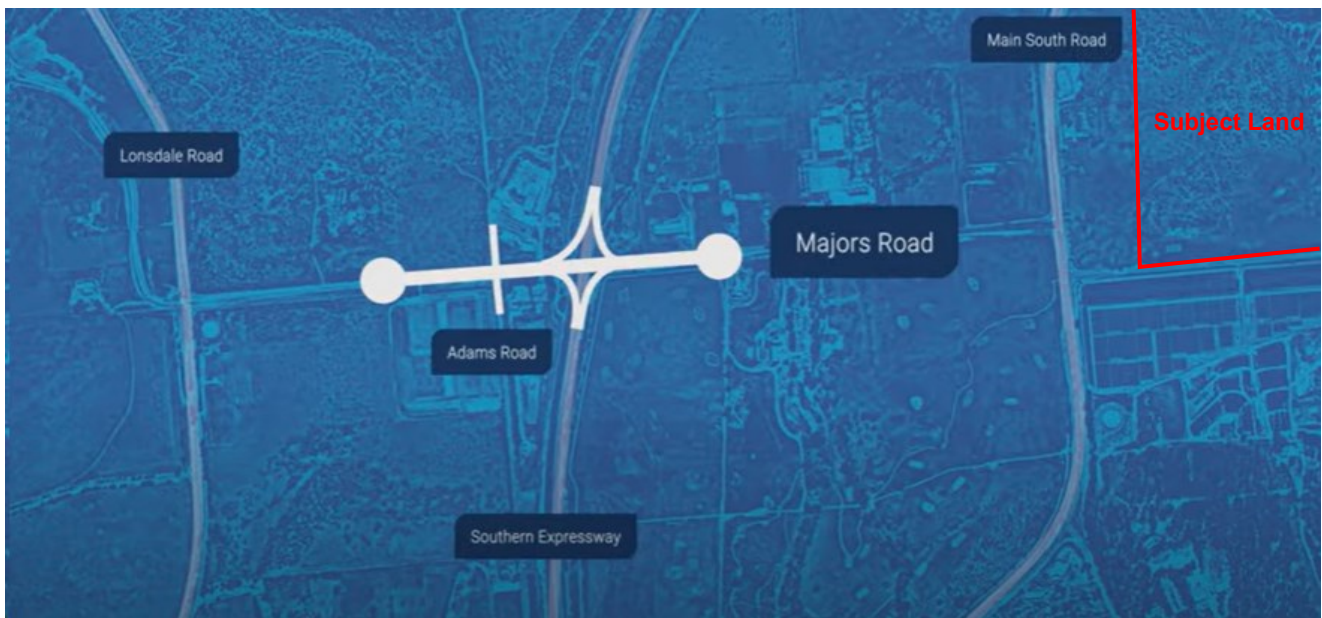


Figure 2-5 Proximity Majors Road Interchange Project (Source: DIT)

There are a large number of recreational sites and parks nearby offering quality public open space including Glenthorne National Park, O'Halloran Hill Mountain Bike trails, Happy Valley Reservoir and Sturt Gorge Recreation Park.

The land can also be readily serviced by key utilities such as potable water and waste, as the following image illustrates.

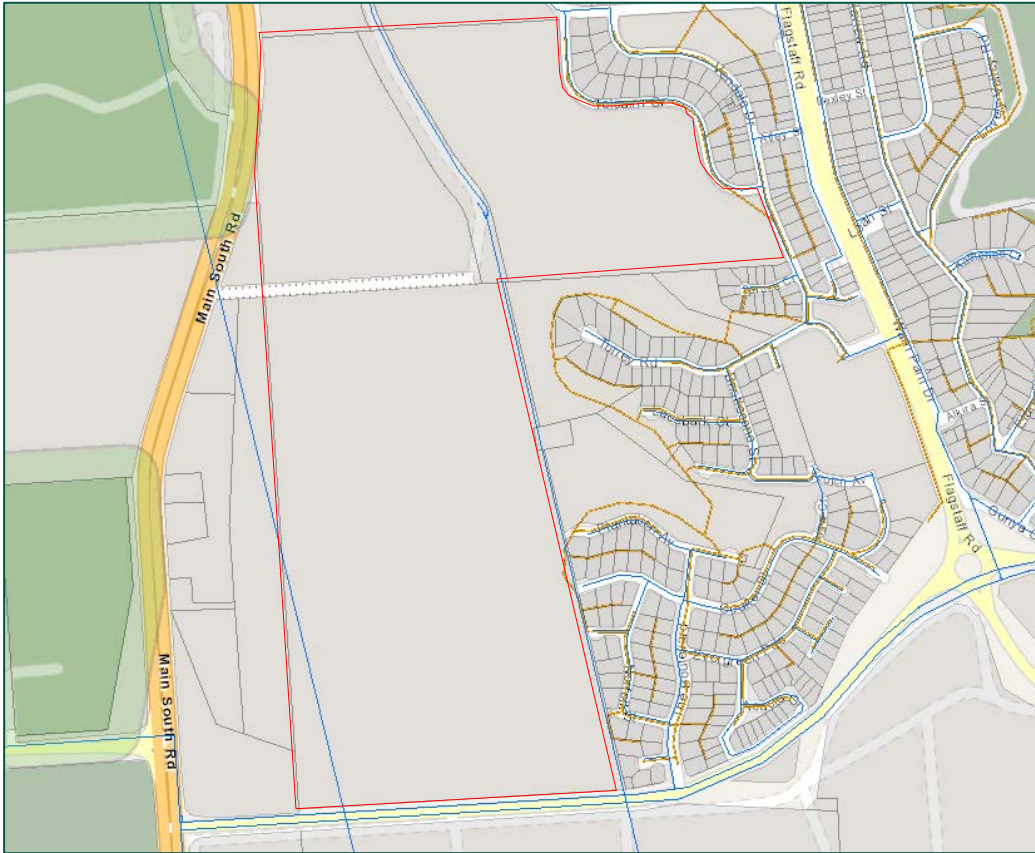


Figure 2-6 Available Potable Water Main (blue) and Sewer Main (brown)

We also note the location of the land in the context of the proposed 'Great Southern Urban Forest' initiative which seeks to create a major regional biodiversity corridor and open space network to effectively link the coast to the hills from Hallett Cove to Sturt Gorge.

Portions of the ADC land located to the north are potentially suited to integration with this future open space network. Potential exists to provide a contribution of land towards a public open space network, as part of a masterplan approval following a rezoning of less sensitive HFZ land owned by ADC to an appropriate residential zone.

Figure 2-7 identifies the ADC as Reservoir Grazing Co.

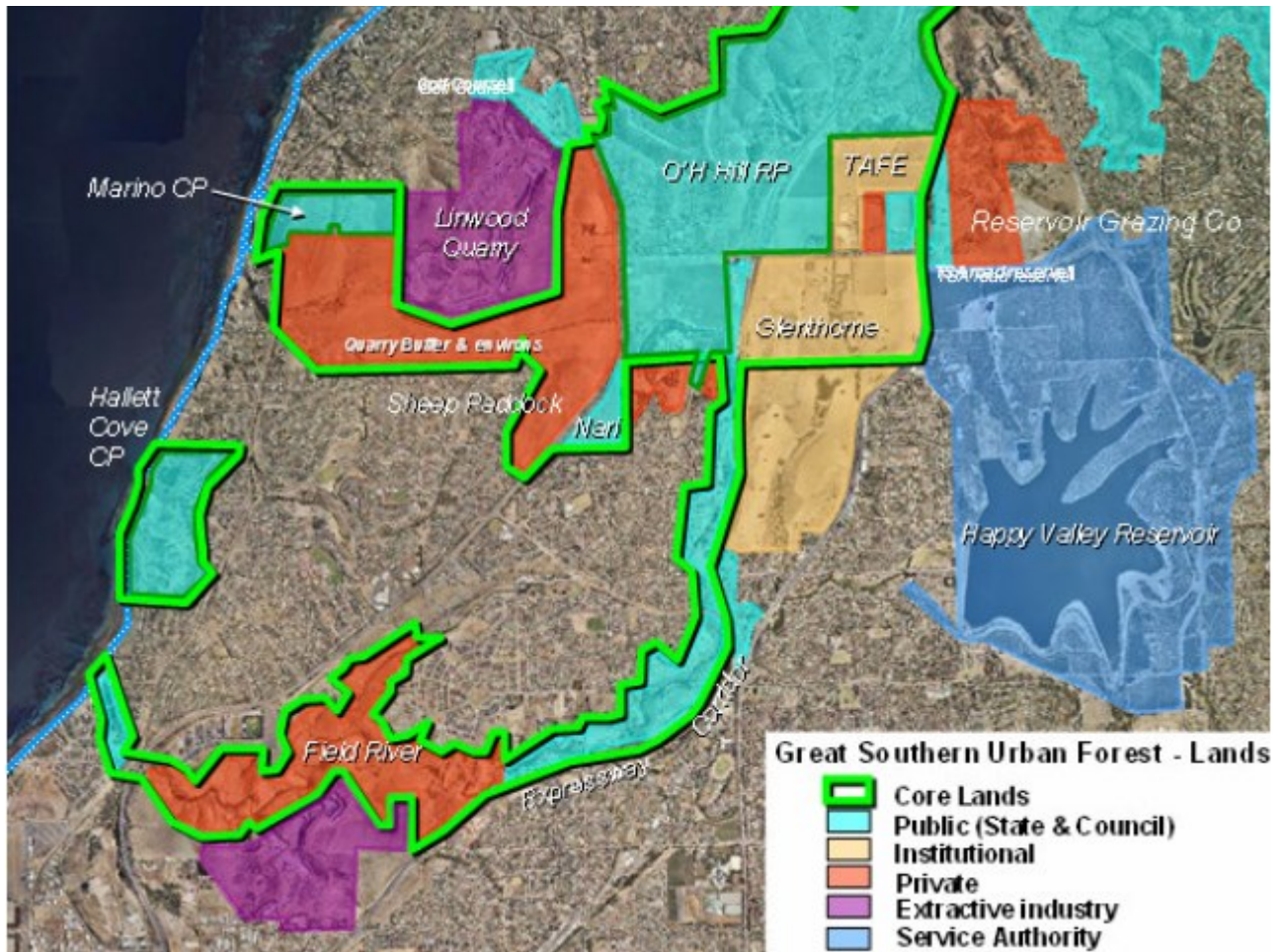


Figure 2-7 The Great Southern Urban Forest – Core Area and potential connection with ADC land [c/- A Proposal for the establishment of The great Southern Urban Forest (Planning SA, DEH & City of Marion, 2005)]

3. Land Supply

The GARP Discussion Paper indicates a projected growth in population within Greater Adelaide of 670,000 by 2051 and forecasts the need to supply 300,000 new homes to meet this projected population increase.

In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success, and there is a clear desire to concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure such as roads, schools, healthcare, water, and public transport services.

Available land supply is heavily skewed towards the north of Adelaide with recognition that land supply constraints in the south are predominantly attributable to the limitations imposed by the EFPA and CPD boundaries.

A conservative review of land within the HFZ may identify certain land ‘pockets’ which can contribute to housing supply through modest infill while leveraging the connectivity to existing infrastructure, existing social services and which also do not require changes to the EFPA or CPD.

4. Submission Request

Notwithstanding the sensitivities associated with the HFZ, it is necessary for contemporary planning systems to undertake regular reviews to ensure the suitability of policy application and measure the continued suitability of zone boundaries. The HFZ is no exception. While there is little doubt that the vast majority of the HFZ across the Greater Adelaide region warrants long term protection from certain types of development, there may be lower lying and less environmentally valuable portions of the HFZ that could be more efficiently used for low density residential development and other suitably scaled ancillary uses.

In this context, ADC are keen to initiate a discussion with the Commission regarding the HFZ and the potential for a select review of potentially ‘less sensitive’ portions of this zone which are outside of the EFPA and CPD.

We note that the suggestion of a set of ‘strategic criteria’ against which land in the HFZ can be assessed in appropriate circumstances has been previously raised by the (former) government albeit, to our knowledge, not progressed.

In the State Government’s response to a 2021 request by ‘The Rocks Marino Pty Ltd’, to rezone HFZ in Marino (Kodaro Road Marino Code Amendment), the then Minister for Planning and Local Government acknowledged the shortfall of residential land within the south of Adelaide and the contribution a selected rezoning of HFZ would have to this supply. While the Code Amendment Initiation was not ultimately supported, the Minister’s correspondence (Appended to this submission), suggested that

“any rezoning of land within the Hills Face Zone should be considered based on consistent strategic criteria, to ensure that the strategic and environmental values are not eroded and that community expectations are appropriately managed”.

The Minister agreed that the Commission should investigate the preparation of strategic criteria for assessment of rezoning proposals of the HFZ and advised that once further analysis had been undertaken against the criteria, further consideration of the rezoning request could occur.

ADC strongly supports this approach and assuming such criteria have not yet been prepared, requests, either as part of the GARP work or separately, that this piece of work be commenced with the support of the Commission.

We envisage criteria may include such assessments as:

- Visual impact viewshed analysis, in particular how visible the land is from various locations within the Adelaide Plains;
- Analysis of the contribution of the land to the Adelaide open space network;
- Native vegetation assessment;

- Fauna habitat assessment;
- Services and infrastructure capacity and augmentation capability;
- Aboriginal cultural heritage assessment; and
- Historical land use assessment to determine European cultural value.

In recognising the significant and unique value of the HFZ to Adelaide, ADC appreciate the challenges in establishing a suitable set of criteria however a set of agreed measures offers the opportunity to objectively critique the contribution of land to the long-term planning of Adelaide. Such criteria could also provide a benchmark against which the various requests received by the Commission for rezoning considerations in this south-western end of the HFZ can be assessed.

Thank you again for the opportunity to provide this submission and on behalf of ADC, we look forward to the opportunity to canvas these issues further at the appropriate time.

Kind regards,



Richard Dwyer
Managing Director



APPENDIX 1

Minister's Correspondence Marino (Kodaro) Road Marino Code Amendment



The Hon Vickie Chapman MP



**Government
of South Australia**

Deputy Premier

Attorney-General

Minister for Planning
and Local Government

GPO Exchange
10 Franklin Street
Adelaide SA 5000


GPO Box 464
Adelaide SA 5001
DX 336

Tel 08 8207 1723
Fax 08 8207 1736

21MPL1326

 March 2021

The Rocks Marino Pty Ltd
C/- Mr Michael Osborn
Director
Future Urban

By email: 

Dear Mr Osborn


I write to advise that, under section 73(2)(b)(vii) of the *Planning, Development and Infrastructure Act 2016* (the Act), I have considered the advice of the State Planning Commission (the Commission) and have resolved not to support the Proposal to Initiate the 2 Kodaro Road Marino Code Amendment at this stage.

I acknowledge the current shortfall of residential land within southern Adelaide and the contribution this proposal would have in addressing this issue. However, I am concerned that the proposal as it currently stands does not sufficiently address the potential impacts of development on the strategic values of the Hills Face Zone (including viewsheds), nor on the ongoing operations of the nearby Linwood Quarry.

Further, I am of the view that any rezoning of land within the Hills Face Zone should be considered based on consistent strategic criteria, to ensure that the strategic and environmental values are not eroded and that community expectations are appropriately managed.

However, I have agreed to the Commission preparing strategic criteria for assessment of rezoning proposals of the Hills Face Zone. Once these criteria have been finalised they will be made available to you for the purposes of undertaking further investigations and analysis, and preparing an updated Proposal to Initiate.

Once further analysis has been undertaken in accordance with the strategic criteria I will reconsider the updated Proposal to Initiate the 2 Kodaro Road, Marino Code Amendment.

Please contact Ms Abi Coad, Senior Planner from the Attorney-General's Department on  if you would like to discuss this further.

Yours sincerely

A handwritten signature in blue ink, appearing to be "Vickie Chapman".

VICKIE CHAPMAN MP
DEPUTY PREMIER
MINISTER FOR PLANNING AND LOCAL GOVERNMENT

DTI:PlanSA Submissions

From: Stefan Ahrens [REDACTED]
Sent: Friday, 27 October 2023 8:06 AM
To: DTI:PlanSA Submissions
Subject: Letter about housing crisis
Attachments: Ahrens - Letter to support local housing which is in deperate need of supply.pdf

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Hi

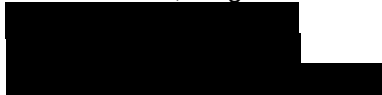
Please see the attached letter to support the need for more housing in our local area.

Regards

Stefan Ahrens
Managing Director



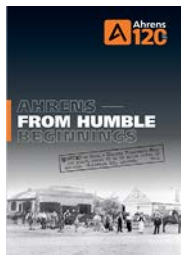
Wilhelm Road, Kingsford SA 5118



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Ahrens

Growth Management Team, Planning and Land Services Use Services
Department for Trade & Investment
GPO Box 1815
Adelaide SA 5001

24th October 2023

To whom this may concern,

Please accept the following submission in response to the Greater Adelaide Regional Plan Discussion Paper, on behalf of the Barossa-based Ahrens Group - a full-service construction, engineering, rural infrastructure and mining services company with operations in South Australia, Queensland, Victoria, Western Australia, Northern Territory and Tasmania, employing more than 1000 people.

We are a proud fifth-generation business with a heritage firmly based in the Barossa Valley. In addition to our construction and engineering operations, our company also has wider tourism and wine industry interests. Our Managing Director, Stefan Ahrens, has been honoured as a member of the invitation-only Barons of the Barossa, which from 1975 has acted to promote and foster the Barossa, its wine, viticulture and gastronomy, to help maintain the heritage, lifestyle and traditions of this great region.

For decades, we have witnessed the growth and development of the greater Barossa's wine and tourism economy as well as the significant contributions made by other major employers such as ourselves, the Ahrens Group, as well as Orora Glass, Nuriootpa Traders, Premium Bottling and Hi Trans, which are all co-located at Kingsford, on the Sturt Hwy.

Greater Adelaide, like many regions worldwide, is grappling with a housing crisis. The shortage of affordable housing options has far-reaching consequences, affecting individuals and families across the socioeconomic spectrum. While the Greater Barossa has benefitted from recent investment in transport corridors that make our area more accessible to a drive-in, drive-out workforce, every business locally has employees who are struggling to find suitable, long-term and permanent accommodation. This will only worsen in years to come.

We remain wholly supportive of the Character Preservation Act, which protects the Barossa from greenfield housing developments, and applaud the State Government's decision to announce Concordia, between Gawler and Tanunda, as the future site of a major new community for our area. However, it has become evident that Concordia is a long-term solution and will do little to provide any relief now to those struggling to find suitable accommodation.

The Discussion Paper also identifies Roseworthy as a strategic location for future housing. It is our belief that the new Greater Adelaide Plan needs to fast-track Roseworthy as the solution to our area's housing crisis. It is not only practical but also advantageous to release and rezone more land at Roseworthy for our immediate housing needs. Concordia will follow as per the plan providing a long-term sustainable pipeline of housing allotments.

Every individual is important.





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Ahrens

The key factors that favour prioritising Roseworthy include its location, its flat landscape, the minimal infrastructure investment requirement, and overall suitability for rapid development.

Roseworthy's location makes it an ideal candidate for expansion. Its proximity to major transportation routes, educational institutions, and employment centres makes it an attractive choice for both residents and businesses. By investing in Roseworthy, we can create a vibrant community that fosters economic growth and enhances the overall quality of life for its residents.

One of Roseworthy's significant advantages is its flat and easily accessible landscape. The flat topography instead of an undulating terrain reduces construction complexity (eliminating substantial earthworks), cost and time making it ideal for streamlining development processes and enabling a swift residential expansion.


Roseworthy is already conveniently located near major transportation routes, including the Northern Connector to the Northern and Port River expressways, Sturt and Thiele highways, and is served by existing utilities and amenities, requiring less time and resources for comprehensive infrastructure planning and implementation. Additionally, we're aware that considerable work has already been undertaken by the local council, developers and the community to identify these needs. There's already widespread community support in place.

Investment in Roseworthy will not only address immediate housing needs but also stimulate economic growth. The construction of new housing and premises for the supporting retail, services and other commercial businesses, will create jobs, benefit local labour markets and inject capital into the regional economy. Expansion of Roseworthy will attract businesses and investors, drawn to the area by the increased population and demand for goods and services. This ripple effect will result in long-term economic prosperity for South Australia.

By showing leadership and taking decisive action, Roseworthy could be well under way and the first families moved in within a short time frame.

In conclusion, the South Australian Government, through the Greater Adelaide Plan, is seeking clear and practical input about where and how we want to live in the future. Prioritising the release and rezoning of land at Roseworthy would be a logical and well-received step to address the pressing housing crisis. By focusing on Roseworthy, the government will efficiently increase the supply of affordable housing for the whole of the Barossa, benefit this important region and contributor to the state's economy.

Yours sincerely,


Stefan Ahrens
Managing Director


David Simmons
Chairman

Every individual is important.



DTI:PlanSA Submissions

From: David Petruzzella [REDACTED]
Sent: Monday, 6 November 2023 9:06 AM
To: DTI:PlanSA Submissions
Cc: Mark Minarelli; Grazio Maiorano
Subject: GARP Discussion Paper Submission - 71 Coventry, Road Kudla
Attachments: 231103 V5 Submission on GARP.pdf

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Good Morning,

Submission regarding the 'Greater Adelaide Regional Plan – Discussion Paper' attached on behalf of Andrea Gonis, owner of 71 Coventry Road, Kudla.

Please get in touch if you have any questions.

Kind Regards,



David Petruzzella
Senior Consultant

27 Halifax Street
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Adelaide SA 5000
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Kaurna Country

My working hours are
Monday to Friday 8:30am – 5:00pm

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3 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
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Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – 71 Coventry Road Kudla

URPS acts for Andrea Gonis, the owner of 71 Coventry Road Kudla (the Affected Area).

The Discussion Paper (Paper) currently on consultation presents key considerations and trends that must be considered in the GARP. It seeks to stimulate debate on how a GARP will help deliver the 300,000 additional homes possibly needed over the next 30 years. We commend the State Planning Commission for preparing this Paper and thank you for the opportunity to provide feedback.

Affected Area

The Affected Area is illustrated in Figure 1. It comprises a single allotment, about 30 hectares in area and located in the Rural Zone of the Planning and Design Code (Code).

It is directly south of the Orleana Waters development, which is well progressed and will ultimately result in allotments extending to Gordon Road (Figure 2). That development has enjoyed strong demand, with stage 12 currently selling.

Renewal SA owns land east of Orleana Waters. That land is largely in the Master Planned Neighbourhood Zone and will eventually be developed for residential purposes. The Main North Road frontage of that land is zoned Open Space. There is also a single small allotment at the corner of Gordon Road and Main North Road which is zoned Employment.

Our client is currently leasing the land for cropping but this is not a long-term viable position, and there are few viable land use options contemplated by the current zoning.

Figure 1: Aerial Image of 71 Coventry Road Kudla

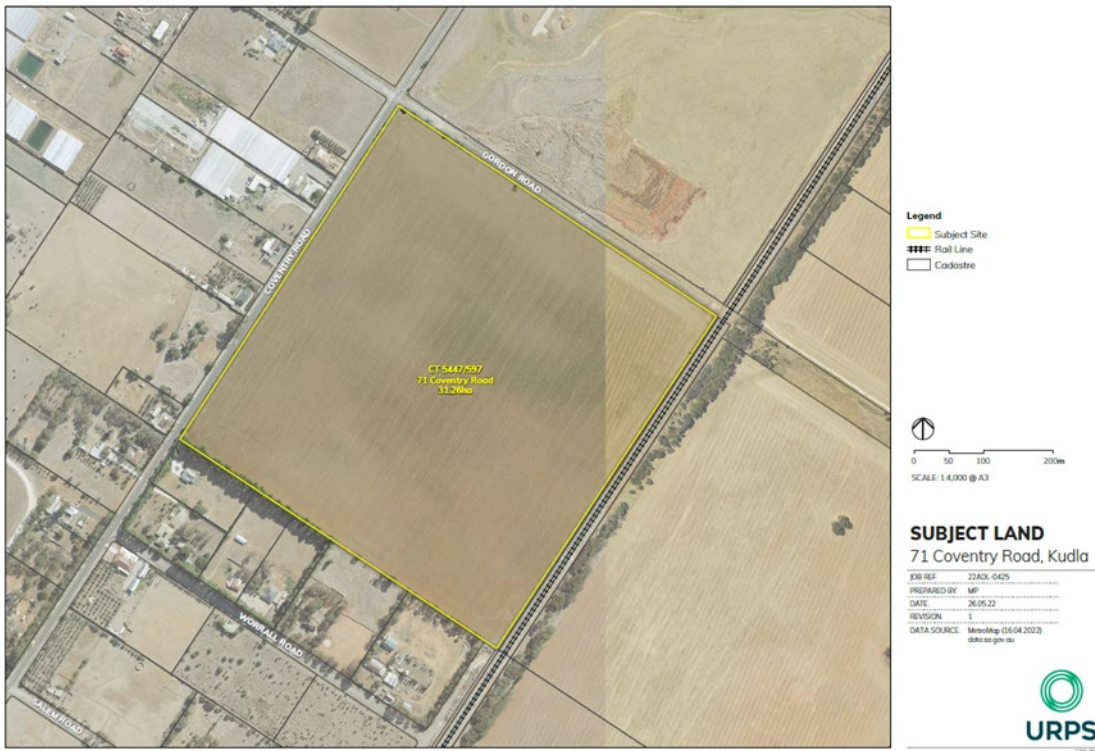
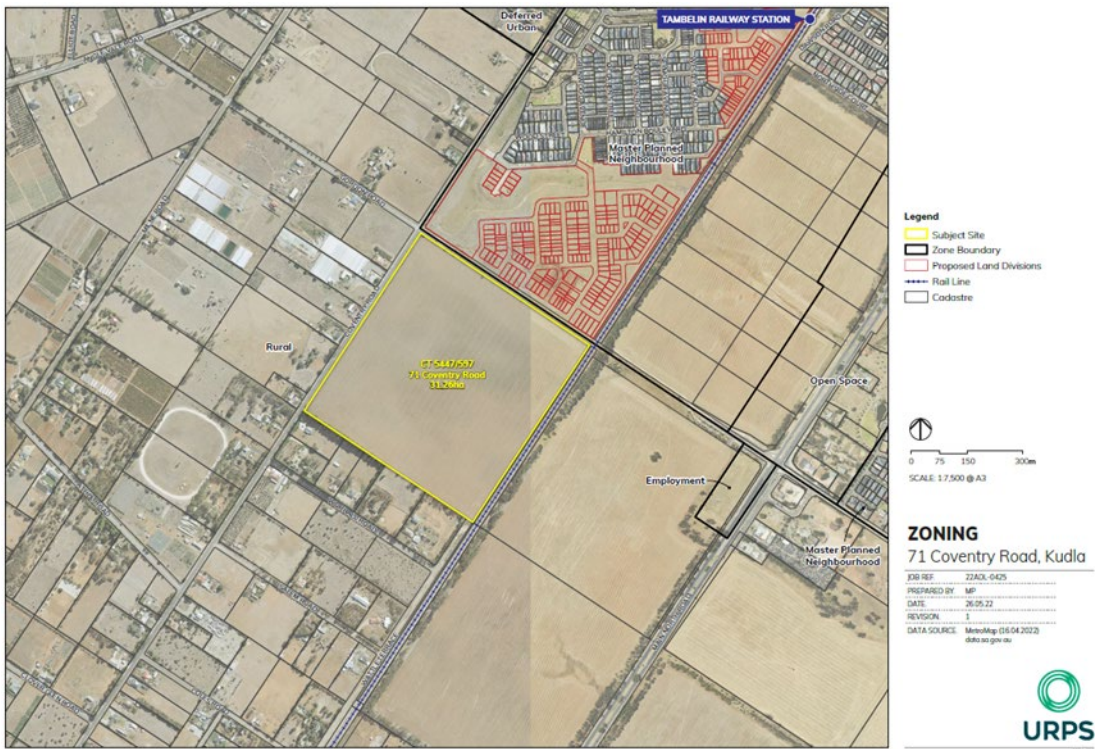


Figure 2: Existing Zoning and Map of “Proposed” Land Divisions



Requested Action

Our client requests that Affected Area is recognised/identified in the GARP as a future residential growth area. This request is justified below.

Justification

This is Consistent with the Intent of the Discussion Paper

The Paper identifies four areas outside, or on the fringe of, metropolitan Adelaide to be investigated for future housing and employment growth.

The 'north-eastern spine', which includes Kudla (Figure 3), is identified as one of these potential growth areas because:

Kudla provides an opportunity for a master planned extension to the Gawler township that takes advantage of recent government investments in electrified rail. Investigation of this area would include the establishment of an inter-urban break in the form of new northern parklands that separate Gawler from the City of Playford and provide new public open space and recreation opportunities.¹

The requested actions are also completely aligned with the Discussion Paper where it states that the GARP should:

Prioritise and sequence the release of zoned land based on transparency of costs to the community of different forms of housing (including upfront development and ongoing living costs).

Prioritise strategic infill sites that are generally more economic to service than general infill.

Focus infill supply in locations where there is capacity in infrastructure networks.

Build on existing infrastructure capacity in townships where local councils identify growth opportunities.

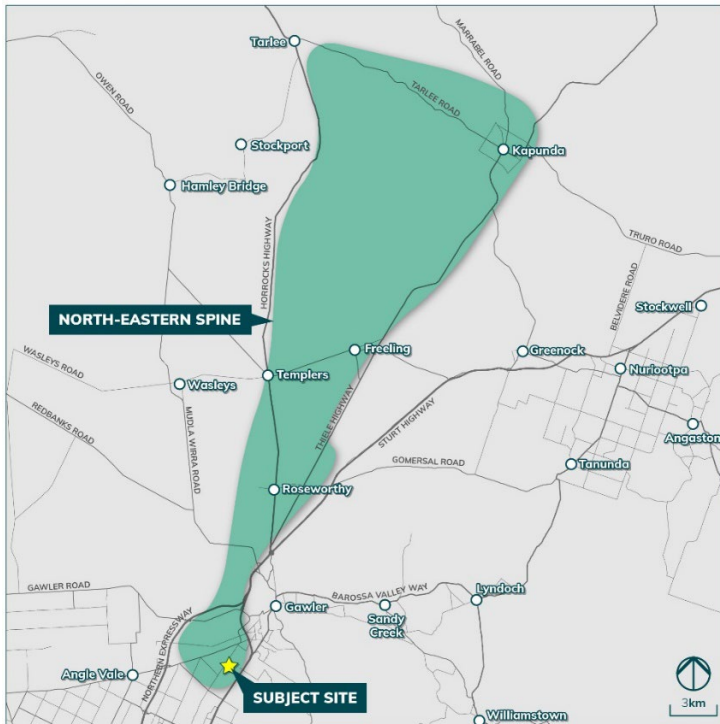
Identify housing opportunities in areas well-connected to services, employment and infrastructure.

Identify strategic infill sites to provide more housing choices in areas near public transport, services and employment options.

Our client supports residential growth occurring in Kudla and surroundings areas. The north-eastern spine (and the Affected Area) provides a logical extension to the existing urban footprint. It benefits from significant investment in public infrastructure. The size of this site also provides opportunity for master planned development.

¹ State Planning Commission, Greater Adelaide Regional Plan Discussion Paper, 2023, page 120

Figure 3: Discussion Paper area of investigation – north-eastern spine



We've prepared Figure 3 to provide greater clarity in respect to the north-eastern spine. URPS acknowledges that the Discussion Paper Mapping is conceptual and not intended to identify specific allotments at this stage.

The Rural Areas Land Capability Assessment Indicates Farming is Not Viable

The Town of Gawler completed a 'Rural Areas Land Capability Assessment' in 2022. It found:

- Primary production in Council's Rural Zone is generally financially unviable due to a lack of affordable water and as the average allotment is too small for field cropping.
- Primary production could only become economically viable if an affordable supply of quality water becomes available and landowners desire to farm the land.
- Although the 'Barossa New Water' project has been identified as a potential source for recycled water, investigations remain in the conceptual phase and infrastructure constraints are not fully understood.
- Council has identified water proofing as a key action in their community plan. This includes seeking an extension of the 'Northern Adelaide Irrigation Scheme', which has largely focussed on securing and utilising recycled water to irrigate Council reserves. We understand there has been no financial commitment from Council to secure recycled water for third parties undertaking agriculture within the Rural Zone
- Even if recycled water was secured for agriculture purposes, salinity levels are likely to be high and require local customers to implement onsite desalination technologies. The potential costs associated with purchasing and powering this equipment requires further consideration and may be prohibitive.

Unfortunately, there was no discussion in the Council's Rural Areas Land Capability Assessment regarding the feasibility and interface pressures facing rural business ventures within existing rural living and residential localities.

Our client contends that farming the Affected Area is financially unviable. In the unlikely event it was financially viable, it would inevitably lead to interface issues and amenity impacts given the Affected Area is adjacent to a Master Plan Neighbourhood Zone, including medium-density greenfield housing. Concerns may include spray drift, noise and operating hours.

More Clarity is Required on the Concept of a Rural Buffer / Greenbelt around Gawler

In the Playford / Dunstan Governments era, a plan was developed to provide a one-mile-wide buffer around numerous townships north of Adelaide. This concept was loosely incorporated into the Metropolitan Open Space System (MOSS)².

The rezoning of land from Rural to MOSS was never undertaken within the Gawler Council Area however. This has meant that some community members have viewed the Rural Zone around Gawler as a pseudo-greenbelt, which is far larger than originally anticipated as part of the Metropolitan Open Space System.

Gawler's Rural Zone is located outside of the Environment and Food Production Area (EFPA)³, which reinforces recent analysis and community sentiment that the area is not a state significant food production area.

The GARP should therefore:

- Clearly identify the rural buffer / greenbelt around Gawler
- Ensure the Affected Area is shown as a residential growth area, outside the greenbelt.

The Requested Action is Aligned with State Planning Policies

The proposal is aligned with several State Planning Policies (SPPs) relevant to the Discussion Paper. SPPs represent the highest level of policy in the planning system and address the economic, environmental and social planning priorities for South Australia.

In particular, the development of the Affected Area is consistent with SPPs 1 and 6 which seek 'Integrated Planning' and 'Housing Supply and Diversity' as:

- It forms a logical expansion of residential land within the existing urban area.

² Gawler (CT) Development Plan consolidated on 18 July 2019, incorporates MOSS Map Ga/1 (Overlay 2) and the following note "This Map is indicative only. The State Government and Councils will undertake studies of each area resulting in detailed zoning maps to designate the boundary of MOSS and the policies relating to various areas. (The inclusion of private land in MOSS does not indicate an intention to purchase that land)". Reference to Development Plan Zone Map Ga/10 illustrates the Kudla area within a Rural Zone.

³ Under the Planning, Development and Infrastructure Act 2016 (SA), EFPAs have been introduced to: (i) protect food producing and rural areas, including conservation of natural landscapes and environmental resources, (ii) support sustainable growth of residential development in existing urban areas to maximise use of existing infrastructure and public spaces; and (iii) provide greater certainty for both food and wine producers and residential developers on the future of urban development in metropolitan Adelaide.

- It is connected to and integrated with existing transport infrastructure, services and other economic activities in the locality (eg the Adelaide to Gawler railway line).
- It would efficiently utilise land that is not suitable for long-term farming, in turn protecting other primary production land that is more productive and viable.
- It would improve, rather than create, land use conflicts. In particular, the Affected Area is currently cropped and interfaces with approximately 10 rural residential properties. Converting the Affected Area to residential land would result in a more consistent land use interface.
- It is integrated with existing residential and commercial development.
- It would support infrastructure investments by increasing associated population catchments (eg electrified rail and Council investments in community infrastructure).
- It would provide increased housing choice, variety and affordability similar to the development to the north.

Conclusion

Our client supports the intent of the Discussion Paper and the identified growth opportunities along the north-eastern spine. Further, we contend the Affected Area is suitable for residential development because of its:

- Large allotment area, which allows for a coordinated, master planned approach.
- Proximity to, and support of, the Adelaide to Gawler railway line.
- Proximity to existing social, community and service infrastructure.
- Integration and alignment with the newly developed urban areas directly north.
- Proximity to the district service centre of Gawler.
- Potential to achieve an integrated approach to development with infrastructure agreements to be secured over the area.
- Potential to support Council's investment in Karbeethan Reserve and the Evanston Gardens Community Centre via population growth.
- Inability to be used for long-term primary production due to economic, servicing (water) and interface obstacles.

We are keen to work with the Commission, government agencies and Council to ensure the development of this land and the delivery of the identified housing objectives.

Yours sincerely

David Petruzzella

Senior Consultant

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Public feedback form

Submit feedback on the Greater Adelaide Regional Plan Discussion Paper

Submit feedback on the Greater Adelaide Regional Plan Discussion Paper.

Use this form to submit feedback to "Planning and Land Use Services" regarding the [Greater Adelaide Regional Plan Discussion Paper](#).

Submissions close on Monday, 6 November 2023.

Amendment * (required)

Greater Adelaide Regional Plan Discussion Paper ▼

Customer type * (required)

Member of the public ▼

Given name * (required)

Aurelio

Family name * (required)

Cavallaro

Organisation

Email address * (required)

Phone number * (required)

Enter a 10 or 8 digit phone number. For example: 0412345678 or 0212345678

Comments * (required)

max 2000 characters

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Max. 2000 characters.

[REDACTED] Angle Vale Rd I would like
to subdivide my land into
1/4 acre blocks.

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 11 September 2023 1:04 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper
Customer type: Member of the public
Given name: BILL
Family name: LEDIAEV
Organisation: land owner
Email address: [REDACTED]
Phone number: [REDACTED]
Comments: land subdivision of kudla area from 1000 sq mtr to 2000 sq mtr for housing
Attachment 1: No file uploaded
Attachment 2: No file uploaded
Attachment 3: No file uploaded
Attachment 4: No file uploaded
Attachment 5: No file uploaded
Sent to proponent email: plansasubmissions@sa.gov.au

From: [REDACTED]
To: [DTI:PlanSA Submissions](#)
Subject: SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER
Date: Wednesday, 1 November 2023 2:15:55 PM
Attachments: [Outlook-kig504sa.png](#)
[231101 Greater Adelaide Regional Plan_Boral submission_final.pdf](#)

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Attention: Growth Management Team
Planning and Land Use Services

Please find attached Boral's submission on the Greater Adelaide Regional Plan Discussion Paper.

Please feel free to contact me should you have any queries.

Regards

SUSAN LEWIS

Senior Planning & Approvals Manager (SA & WA)
Boral Property Group



Boral

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www.boral.com.au

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Boral Limited
ABN 13 008 421 761

Boral Property Group
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Norwood SA 5067
T: (08) 8425 0400

boral.com.au

1 November 2023

Attention: Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

Via email: plansasubmissions@sa.gov.au

Dear Sir/Madam

SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

1. Introduction

As an owner and operator of strategic assets in the Greater Adelaide Planning Region, Boral has undertaken a review of the Greater Adelaide Regional Plan Discussion Paper ('Discussion Paper').

Through its quarries, concrete and asphalt plants, Boral is a major supplier of products and materials to the residential and commercial construction, and roads and engineering markets including asphalt, cement and lime, concrete, quarry materials and recycled materials. Refer **Attachment 1**.

Boral's quarries alone within South Australia produce and transport 2.7 million tonnes per annum of aggregates, sand, pavement materials and ballast.

Linwood Quarry, Stonyfell Quarry and Para Hills Quarry have approval for extraction to continue for the next 100+, 50+ and 30+ years respectively.

Boral is appreciative of the opportunity to provide feedback on the Discussion Paper, and outlines below what it believes are key issues to meet the balanced growth of the Greater Adelaide Planning Region over the next 30 years.

2. Comments on the Discussion Paper

Growth is a key theme in the Discussion Paper, it is therefore critical that the key ingredients and drivers of growth are identified and feed into this, and the next step in the strategic planning framework.

One of the key ingredients to growth that contributes to housing, infrastructure, employment and natural resource management are the regions extractive resources.

These resources produce concrete and asphalt aggregates, sand, road bases, drainage materials, gabion and ballast that are the building blocks of growth in any region. Around 30% of building costs for any housing and infrastructure project are made up of products originating from these extractive resources. Extractive resources are therefore a key natural resource, and their availability and proximity are vital for the balanced growth of a region.

However, the Discussion Paper, only mentions this topic twice, and in general terms on:

- Page 33 – noting that much of the opportunities and constraints mapping has been derived from the 16 State Planning Policies (SPP) including 10. Mineral and energy resources
- Page 103 "We must also safeguard mining sites (for essential resources and construction materials), airports and defence sites".

It is our view that the Discussion Paper would benefit from a greater emphasis on the future availability of extractive resources.



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SPP 10 of the *State Planning Policies for South Australia (version 1.1 23 May 2019)* identifies the following objective and policies:

Objective

To protect key resources that contribute to our state's economy and provide valued employment opportunities.

Policies

10.1 Define and protect mineral resources operations, associated infrastructure and undeveloped mineral resources from encroachment by incompatible land uses.

10.2 Plan for and encourage the development of energy resources, energy resources operations and associated infrastructure to ensure their ongoing safe and efficient operation.

10.3 Identify and maintain key infrastructure that supports mineral and energy resource activities and supply chains, including strategic transport corridors and pipelines used for energy transportation.

10.4 Consider the impacts of mining and exploration on the growth of towns and settlements, and ensure an appropriate form of housing for workers and their families.

10.5 Promote decision making that maximises the long term benefits of different land uses to the economy, communities and the environment.

Further, SPP 10 helpfully includes principles for Regional Plans (such as the Greater Adelaide Regional Plan):

Regional Plans should identify mineral and energy resource areas, associated infrastructure, including connections via strategic access routes, transport corridors and pipelines. Strategies to minimise the impacts of encroachments by incompatible land uses should be identified to manage risk to public safety, the environment and security of energy supply.

The operation of construction material industries (including quarries, concrete batching plants and asphalt plants) should not be compromised by encroachment from sensitive land uses such as residential, which are impacted by noise, dust, light and odour.

The establishment and/or protection of existing construction material industries in proximity to on-going significant demand is critical to the successful delivery of the government's plans and major infrastructure projects.

For example, given the perishable nature of concrete, there is only approximately 45-60 minutes (depending on the mix specification) to deliver and place the concrete before its strength properties become compromised and the concrete batch must be discarded. Delays caused by traffic can and do affect the delivery times and reducing the distance travelled from production point to construction site dramatically improves construction quality outcomes and costs.

3. RAMP Report

The 2014 Resource Area Management and Planning (RAMP) Final Report, GHD for the Department of State Development was commissioned to address these issues. Boral recommends that the State Planning Commission consider the details in the report and implement the key outcomes sought, including:

Complementary changes to both the mining and development systems are needed in order to achieve the desired outcomes for the State. This is effectively an up-date of the systems to enable them to cope with increasingly complex and competing issues. This is essential in order to provide greater clarity and certainty for landowners, property investors and mining investors/operators.

A more collaborative approach to the planning and mining systems is needed. This approach should aim to address the majority of interface issues by achieving better mechanisms for:



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- *Interaction between the Development Act and the Mining Act at the strategic level to protect strategic mineral resources;*
- *Establishing better overall practices for dealing with interface issues;*
- *Recognising the presence of existing mines, mitigate potential interface issues as much as possible and avoid the intensification of existing interface issues via the planning system;*
- *Protecting new mines as they emerge and recognise them via the planning system;*
- *Ensuring that new landowners are notified of the presence of a mine; and*
- *Recognising transport routes that carry heavy vehicles and the interface issues that can arise.*

4. Conclusion and Recommendation

In summary, given the importance of construction material industries and resources to the balanced growth of the Greater Adelaide Region, and to ensure that construction materials can be delivered to future development sites in an economical and sustainable manner, Boral recommends the following measures for the Greater Adelaide Regional Plan:

- include maps identifying the location of existing construction material industries
- implement the principle identified in SPP 10
- implement the recommendations of the RAMP report.

Thank you for the opportunity to comment on the Discussion Paper. We would welcome the opportunity to supply further data if required.

Please feel free to contact Susan Lewis, Senior Planning and Approvals Manager (SA & WA) via email [REDACTED] or [REDACTED] should you require any clarification.

Yours sincerely

DAVID BOOTS

General Manager – Concrete & Quarries (SA)



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Attachment 1: Location of Boral assets in South Australia

21

State Planning Commission



10,873km²

Total area



DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Tuesday, 10 October 2023 6:56 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper
Customer type: Member of the public
Given name: Cameron
Family name: Hinde
Organisation:
Email address: [REDACTED]
Phone number: [REDACTED]
Comments: I live on [REDACTED] Kudla 5115. I would like there to be subdivisions in the area to 1000m2 blocks. Kind Regards. Cameron Hinde
Attachment 1: No file uploaded
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Attachment 3: No file uploaded
Attachment 4: No file uploaded
Attachment 5: No file uploaded
Sent to proponent email: plansasubmissions@sa.gov.au

DTI:PlanSA Submissions

From: Emily Nankivell [REDACTED]
Sent: Thursday, 2 November 2023 11:34 AM
To: DTI:PlanSA Submissions
Cc: Chloe Vounasis
Subject: Submission to the Discussion Paper on the Greater Adelaide Regional Plan - Carmelo Road, Riverlea Park
Attachments: Submission to the GARP Carmelo Road.pdf

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Dear Growth Management Team,

Please see **attached** submission to the Discussion Paper for the Greater Adelaide Regional Plan in relation to land at 15, 24 and 28 Carmelo Road, Riverlea Park.

Please confirm receipt of the submission.

Kind regards,

EMILY NANKIVELL
Associate Director



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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November 2, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001
Via email: plansasubmissions@sa.gov.au

Level 1, 74 Pirie Street
Adelaide SA 5000
PH: 08 8221 5511
W: www.futureurban.com.au
E: info@futureurban.com.au
ABN: 76 651 171 630

Dear Mr Holden

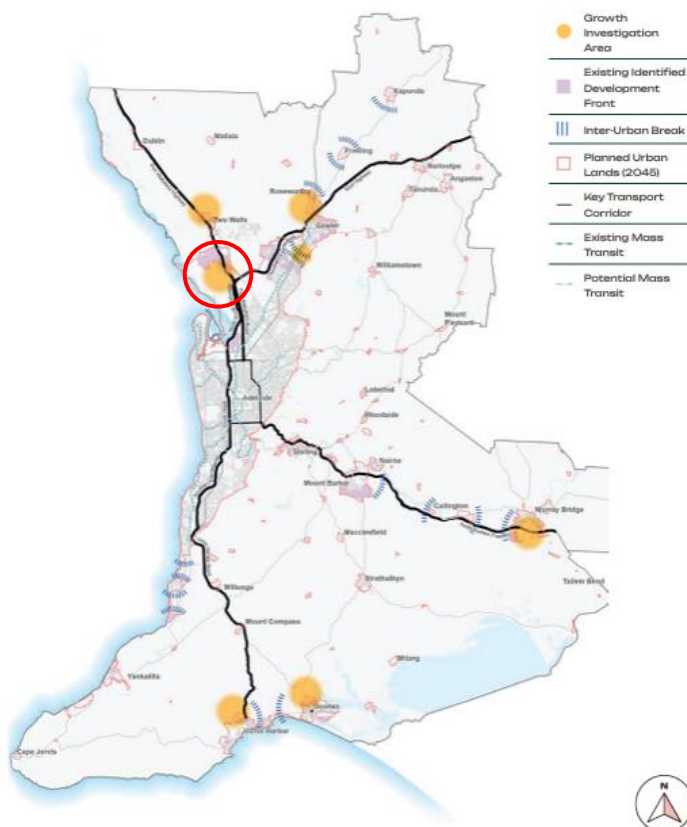
SUBMISSION TO THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for the registered proprietors of land at 15, 24 and 28 Carmelo Road, Riverlea Park ('the land') and the Proponent for a proposed Code Amendment over the land.

The Greater Adelaide Regional Plan Discussion Paper (Discussion Paper) has identified the general area where the land is located as an area of investigation for residential growth (refer **Figure 1**).

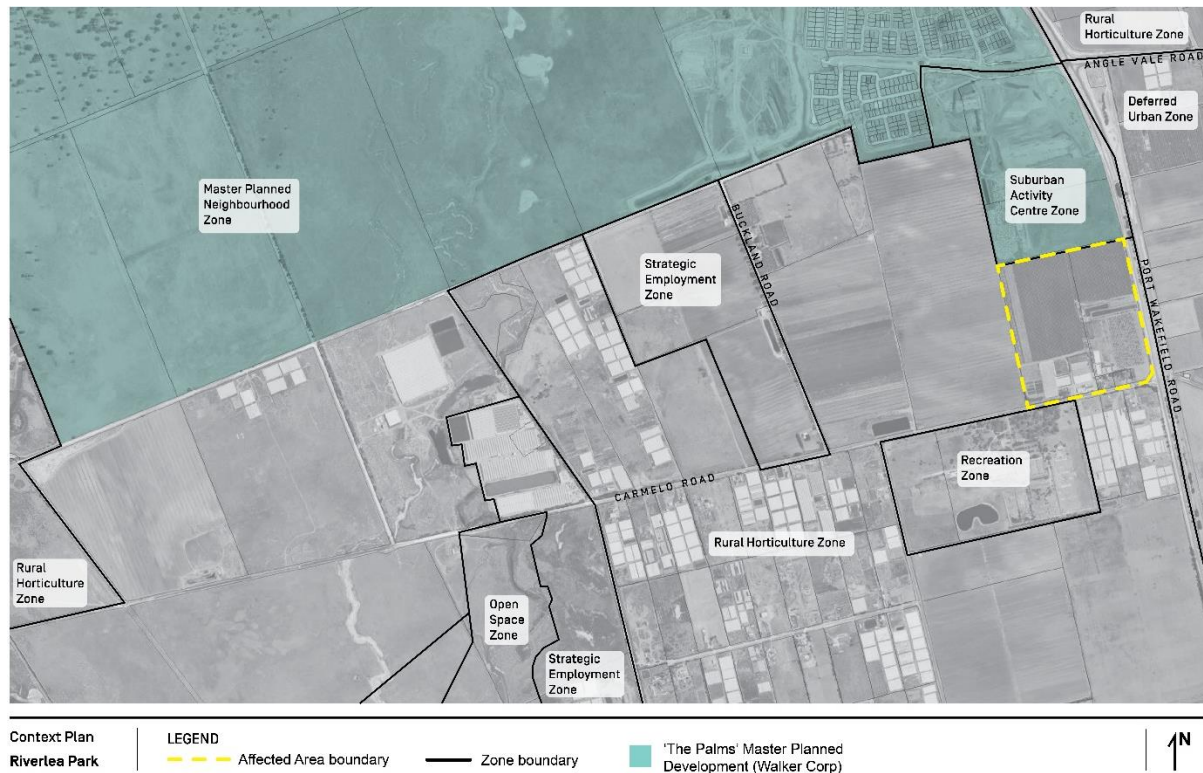
Figure 1 *Proposed Areas of Investigation: Greenfield and satellite city growth taken from page 126 of the Discussion Paper. The relevant investigation area identified by the red circle.*

Figure 9 – Proposed areas of investigation
Greenfield and satellite city growth



A Proposal to Initiate a Code Amendment over the land was submitted to the Department for Trade and Investment (DTI) on 12 September 2023. The Code Amendment proposes to rezone the land from the Rural Horticulture Zone to the Master Planned Neighbourhood Zone (refer **Figure 2**).

Figure 2 Subject land in context



Early engagement has been undertaken for the proposed Code Amendment with, among other stakeholders, the Department for Infrastructure and Transport (DIT) and Walker Corporation being the owner of the “The Palms” housing estate (adjacent) and adjoining Suburban Activity Centre. This early engagement has demonstrated the importance of achieving a residential land use for the subject land consistent with that of The Palms. This will ensure that the future use of the subject land will support the Suburban Activity Centre and deliver a critical second vehicle access point from Port Wakefield Road.

DIT has been engaged in respect of creating a second access point and by letter dated 22 February 2023 advised (*paraphrased*):

- The Walker Corporation have identified a desire to create an additional access to Port Wakefield Road to service its development and that the Proponent (our client) is also seeking access to support future development of the land;
- Walker Corporation have identified a potential access location near the southern boundary of its development. However, this location has a number of limitations given the proximity to the proposed access to the Port Wakefield Road/Riverlea Boulevard/Angle Vale Road intersection and the ramps of the potential future overpass;
- While DIT has not agreed to an additional access to serve The Palms, it understands that additional access to the Riverlea Park area provides greater benefit in terms of managing traffic accessibility; and

- DIT considers the concept design prepared by MFY Traffic and Parking Consultants (MFY) to be a reasonable starting point that shows a single new access (contained within the Affected Area) can potentially be accommodated in the location identified in the pre grade separation scenario, noting that further assessment and design refinement will need to occur before DIT can endorse the access and its design.

In addition to this early engagement, considerable investigations have been carried out for the proposed Code Amendment with a strategic approach taken to future growth and future infrastructure needs of the broader area to ensure that growth occurs in a coordinated way.

The key outcomes that will be achieved by the Code Amendment and future residential use of the land include:

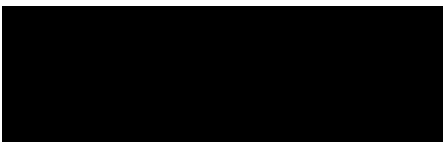
- a logical expansion of the existing Master Planned Neighbourhood Zone located to the south of the land;
- unlocking and providing access to the Suburban Activity Centre Zone;
- provide the catalyst to unlock 382 Carmelo Road located at the western end of Carmelo Road and contained within the Master Planned Neighbourhood Zone;
- will set the necessary pre-conditions for land owners in the area to enter into infrastructure agreements to ensure the orderly delivery of infrastructure for this region; and
- will provide much needed affordable housing at a rate greater than 15%. The intent is to deliver 20-25% affordable housing and this has been agreed in principle by the SA Housing Authority.

The inclusion of the land in the residential growth investigation area (refer **Figure 1** above) results in a logical and appropriate planning outcome, is consistent with the proposed Code Amendment and supported by the owners of the land. The residential land use is also supported by Walker Corporation who desire a residential outcome that is consistent with the brand and liveability of The Palms as an attractive gateway entrance into the activity centre. The land owners are also supportive of the GARP identifying the broader areas for residential growth that would facilitate a planned and coordinated approach to infrastructure delivery.

Due to existing zoning in the area, development that is occurring in the immediate locality and strategic importance of the land in unlocking the potential of other allotments in the area, the residential use of the land is supported.

Thank you for your consideration of this submission.

Yours sincerely,



Chris Vounasis
Managing Director

DTI:PlanSA Submissions

From: George Kaldis [REDACTED]
Sent: Tuesday, 31 October 2023 9:10 AM
To: DTI:PlanSA Submissions
Subject: Letter for consideration
Attachments: 31102023082345-0001.pdf

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Good morning

Please find attached letter for your consideration

Regards

George Kaldis
Chief Operating Officer
[REDACTED]

ABN: 78 077 924 120

598-600 South Road
Angle Park SA 5010
Ph +61 8 8347 1888
Fax +61 8 8347 1877
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24/10/2023

To whom it may concern,

As the owner of one of South Australia's most successful civil engineering and construction companies, CATCON, with employees working on almost every major infrastructure project currently in progress, I have a personal and commercial interest in the outcomes of the Greater Adelaide Regional Plan.

The current Discussion Paper is seeking feedback from South Australians on the principal question of how and where we should live in the coming decades.

As someone who is regularly forced to house his employees in caravan parks near projects now under way within the Greater Adelaide footprint, I am concerned about the ongoing lack of housing availability and affordability going forward.

The chief lifestyle concern among my workforce and potential hires is where they live - an issue that has increased in recent years as housing availability and affordability has diminished locally. This is especially of concern to those who want to be based in Adelaide's northern suburbs and fringes. This is the preferred location for many because of family and cultural ties and often because many civil and construction opportunities for work are based across the northern areas.

In recent times, CATCON has won contracts for the Northern Connector, Gawler Rail electrification, Robertstown Substation & Synchronous Condenser and the Golden Grove Rd upgrade and we are currently working on preparing Roseworthy for new housing releases.

As you know, the current housing development at Roseworthy is a modest expansion compared to the township project originally conceived over a decade ago and shelved.

It is heartening to see the Discussion Paper recognise the township growth potential of Roseworthy however, it is disappointing to see the vital contribution it could make as an affordable and attractive housing site has been de-prioritised until well into the late 2030s.

As an engineering and construction business, reliant on key infrastructure projects in road, transport, resources and renewables, we are fully versed in major capital expenditure proposed over the coming decade.

The completion of the North-South Road corridor and the Northern Water desalination project are two that will require a significant workforce in the coming years. Workers need homes and we share the wider community's concerns that South Australia needs to fast-track more housing immediately. It takes several years - I understand as many as 4+ - for new land to be released, re-zoned and made shovel-ready for its new owners or tenants to move in.

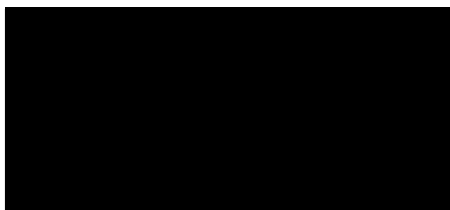
While the South Australian Government announced significant and much-welcomed land releases for new housing earlier this year, it will be some time before much of this land becomes available, particularly in areas with challenging topography.

Our exposure to the current modest expansion taking place at Roseworthy has highlighted the township's potential - its location near a major transport corridor and easy link to metro Adelaide via the Northern Expressway and to the mid-north via the A1 or Horrocks Highway. The expansion already has widespread local and council support, recognising the economic stimulus it will generate in the region.

Given the substantial cost of trunk infrastructure, the opportunity to maximise existing infrastructure assets is a further plus for Roseworthy.

(cont'd)...

Thank you for this opportunity,



George Kaldis
CATCON

DTI:PlanSA Submissions

From: David Petruzzella [REDACTED]
Sent: Monday, 6 November 2023 9:06 AM
To: DTI:PlanSA Submissions
Cc: Chris Marciano; Grazio Maiorano
Subject: GARP Discussion Paper Submission - 3 Wittwer Court, Hahndorf
Attachments: 230926 Submission GARP-3 Wittwer Ct_V4 FINAL.pdf

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Good Morning,

Submission regarding the 'Greater Adelaide Regional Plan – Discussion Paper' attached on behalf of Chris Marciano, owner of 3 Wittwer Court, Hahndorf.

Please get in touch if you have any questions.

Kind Regards,



David Petruzzella
Senior Consultant

27 Halifax Street
Enter via Symonds Pl
Adelaide SA 5000
08 8333 7999

Kaurna Country

My working hours are
Monday to Friday 8:30am – 5:00pm

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2 November 2023

Growth Management Team
Planning and Land Use Services (PLUS)
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – 3 Wittwer Court, Hahndorf

URPS acts for Chris Marciano, the owner of 3 Wittwer Court, Hahndorf.

The Discussion Paper (Paper) currently on consultation presents key considerations and trends that must be considered in the GARP. It seeks to stimulate debate on how a GARP will help deliver the 300,000 additional homes possibly needed over the next 30 years. We commend the State Planning Commission for preparing this Paper and thank you for the opportunity to provide feedback.

Affected Area

We have attached a locality and zoning plan for the Affected Area (3 Wittwer Court, Hahndorf). The Affected Area comprises 1 allotment which is approximately 3 hectares. It is located in the Productive Rural Landscape Zone and the Environment and Food Production Area (EFPA) according to the Planning and Design Code (Code). The land directly abuts the Hahndorf township.

The land is not commercially farmed due to its small size and close proximity to residential land. As limited land uses are available to the owner, the land is generally dormant although maintained. This is not a viable long-term position.

Extracts from the GARP Discussion Paper

The Paper identifies that the population of Greater Adelaide could grow by an additional 670,000 people (300,000 dwellings) by 2051.

The Paper is largely silent on the significant residential growth opportunities available in the Adelaide Hills, however. Instead, the satellite cities of Mount Barker and Murray Bridge are the focus for the “Eastern Spine”.

New growth opportunities within the EFPA will likely need to be investigated into the future to maintain a suitable long-term supply of land, as highlighted by the Paper:

“As part of identifying long term land for growth (16 to 30 years), the Commission will review growth opportunities within EFPAs. This will not remove land from the EFPAs, but rather provide direction about areas to look at for future growth, when the EFPAs are reviewed in the future. The aim is to ensure an ongoing 15-year supply of zoned urban land.”

Requested Actions

Our client requests that the GARP:

- Identifies the Affected Area as a residential growth area which can support the logical expansion of Hahndorf.
- Provides greater guidance regarding the role of Adelaide’s Hills townships (such as Hahndorf) in accommodating residential growth.
- Establishes an interim process and/or a clear strategy to resolve zoning and EFPA boundary anomalies, including in the Adelaide Hills.

In most instances, Adelaide Hills towns are well serviced and highly sought after by homeowners and tenants. There is high demand and low supply.

The landowner is open to the Affected Area supporting a variety of housing types which are sensitive to the locality. As an established developer, the landowner can deliver a turnkey product which could support affordable housing initiatives, disability accommodation or a combination both.

Justification

There are Existing Land Supply Issues in Hahndorf

URPS investigated Hahndorf’s residential land supply in April 2023, which highlighted that residential land is in limited supply. In fact, this problem could be compounded as Hahndorf has much less residential land available than previously estimated.

The Land Supply Report for Greater Adelaide prepared by the State Government provides dwelling demand projections under a medium and high growth scenario for the Adelaide Hills region¹. On page 56, these projections indicate:

- Under a medium growth scenario - 300 dwellings per annum will be required. This consists of 250 in Greenfield areas and 50 in other (including townships).
- Under a high growth scenario - 400 dwellings per annum will be required. This consists of 340 in Greenfield areas and 60 in other (including townships).

¹https://plan.sa.gov.au/_data/assets/pdf_file/0005/830984/Land_Supply_Report_for_Greater_Adelaide_-_Greenfield.pdf

This report also contains land supply data on the townships in this region, as summarised in **Appendix A** of this letter. It identifies that the region's townships contain approximately 222 hectares of 'Development Ready' and 'Undeveloped Zoned' land, which is estimated to support approximately 1248 lots. This supply will suffice for approximately 20 years under the high growth scenario.

Further land is identified for urban growth in Macclesfield and Meadows, currently zoned Deferred Urban. When this land is incorporated into the equation, township land supply increased to 276 hectares which is estimated to support 1661 lots, providing an approximate 27-year supply.

The Land Supply Report for Greater Adelaide indicates Hahndorf's supply of residential land is largely contained within the 'undeveloped zoned' land category. This is defined as land, which is over 4,000m² in area, located in an appropriate zone (residential, neighbourhood etc.) and with no active plan of division. Hahndorf's supply of approximately 21 hectares is estimated to yield 61 allotments. However, the report does not contain any detail as to where exactly this land is in the township or how this estimated yield was calculated.

URPS undertook a desktop analysis of residential land supply in Hahndorf. This identified that there is only 5.95ha of vacant land in Hahndorf's Township Neighbourhood Zone - this equates to only 6% (approx.) of the townships total supply.

Township Neighbourhood Zone	Area m ²	Hectares
Vacant land	59,456	5.95
Residential land	965,123	96.5
Total residential and potential residential land in TN zone	1,024,580	102.45

Table 2: Vacant Land Table – Township Neighbourhood Zone²

This figure of 5.95 hectares is considered a more realistic appraisal of available land in Hahndorf as opposed to the 21 hectares utilised in the Land Supply Report, as:

- The owners of Development Ready or Undeveloped Zoned Land may have no desire to subdivide and sell their land.
- Existing planning policy is likely to present obstacles to infill. The yields anticipated by the Land Supply Report may be ambitious.
- The Land Supply Report figures likely includes the Township Mainstreet Zone/State Heritage Area.

URPS' analysis intentionally excluded the Township Main Street Zone in the Heart of Hahndorf as it is largely located within a State Heritage Area, which is unlikely to provide any real capacity for growth.

² <https://data.gov.au/home>

Our analysis confirm Hahndorf's residential land supply is almost exhausted. This presents a unique set of challenges to prospective purchasers who wish to buy in Hahndorf as a limited supply will continue to increase prices.

There are Housing Affordability Issues in Hahndorf

Housing affordability continues to be a serious issue for South Australia. Constrained land supply is a key contributor to this problem.

URPS consulted a local real estate agent to understand their perspective regarding housing affordability (Nina Bidgood, Hahndorf Real Estate, on 5 April 2023). Ms Bidgood confirmed that there is continuing strong demand for housing and residential land within Hahndorf. A summary of key conversation points is provided below:

- Demand for residential land in Hahndorf remains strong.
- Hahndorf is now considered out of reach (no longer affordable) for the average family. A modern, but average family home can sell for upwards of \$1.2 million.
- Purchases under a million dollars are considered good value, highlighting a lack of supply and a lack of affordable homes.
- People interested in building in Hahndorf are generally drawn to greenfield areas such as the Mount Barker township unless their budget allows differently.
- The cost of demolishing an existing house in Hahndorf to build a new dwelling is very high.
- Opportunities for infill are limited, largely due to heritage limitations. Noting this, several hammerhead style developments have been permitted.

The EFPA and Township Boundaries are Poorly Aligned

The Affected Area is within an isolated pocket of the EFPA at the western side of the township, surrounded by more sensitive land uses (outside the EFPA) and the South Eastern Freeway, as highlighted below. This EFPA pocket is difficult to farm due to the smaller average size of the allotments and its proximity to residential areas.

This anomaly creates land holdings which are highly constrained, however can support additional residential growth in an area which is in-demand and has access to infrastructure and services.



The Requested Actions are Aligned with State Planning Policies

The requested actions provide tangible responses to the following “ideas for the GARP” identified by the Discussion Paper:

Prioritise and sequence the release of zoned land based on transparency of costs to the community of different forms of housing (including upfront development and ongoing living costs)

Prioritise strategic infill sites that are generally more economic to service than general infill.

Focus infill supply in locations where there is capacity in infrastructure networks.

Build on existing infrastructure capacity in townships where local councils identify growth opportunities.

Identify housing opportunities in areas well-connected to services, employment and infrastructure.

Identify strategic infill sites to provide more housing choices in areas near public transport, services and employment options.

Our client’s intent to develop the land is also aligned with several State Planning Policies (SPPs) relevant to the Discussion Paper. SPPs represent the highest level of policy in the planning system and address the economic, environmental and social planning priorities for South Australia.

It is consistent with SPP 1 which seeks Integrated Planning in that:

- The development of the Affected Area provides for the logical expansion of the Hahndorf township.
- The Affected Area is connected to and integrated with existing transport infrastructure and services including mains water and sewer, as well as other economic activities in the locality.
- Residential development of the Affected Area would be compatible with, and further, justify the State Government’s recent investments to improve traffic within Hahndorf. In particular, the existing half interchange at Verdun will be upgraded to a full interchange, reducing unnecessary traffic and congestion through Hahndorf. Trucks over 15m long will also soon be banned from travelling through Hahndorf.

Further, it is consistent with SPP 6 which seeks Housing Supply and Diversity in that:

- The development of the Affected Area would integrate with surrounding residential and commercial development.
- According to Census 2021 data, compared to Greater Adelaide, Hahndorf contains:
 - A higher proportion of detached housing
 - A lower proportion of medium density
 - A higher proportion of 4- and 5-bedroom homes.

Development of the Affected Area would therefore reduce pressure on housing affordability and provide greater housing choice (e.g. by providing smaller homes and allotments than typically prevails in the township).

- Further, it would support infrastructure investments by increasing associated population catchments.

Conclusion

Our client seeks:

- The Affected Area to be identified in the GARP as a residential growth area which can support the logical expansion of Hahndorf.
- The GARP to provide greater guidance regarding the role of Adelaide's Hills townships (such as Hahndorf) in accommodating residential growth.
- An interim process and/or a clear strategy to resolve zoning and EFPA boundary anomalies in the Adelaide Hills.

We consider these requests to be justified.

Residential land supply in Hahndorf is limited and has been previously over-estimated. We estimate current residential land supply within Hahndorf to be only 5.95ha.

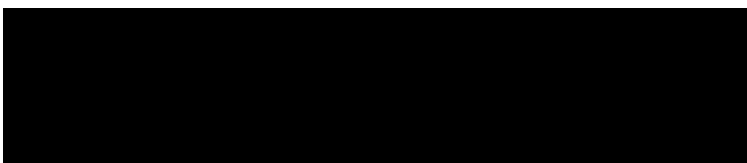
Constrained land supply is a key contributor to housing affordability issues, including in Hahndorf.

The Affected Area (and surrounds) is wedged between the Freeway and residential land, so it is highly constrained and not conducive to meaningful productive farming.

The requests are aligned with the State Planning Policies as it would improve housing supply and diversity in a well serviced location.

We are keen to work with the Commission, state agencies and Council so a strategy can be prepared that sets out a process to address these minor amendments.

Yours sincerely



David Petruzzella
Senior Consultant

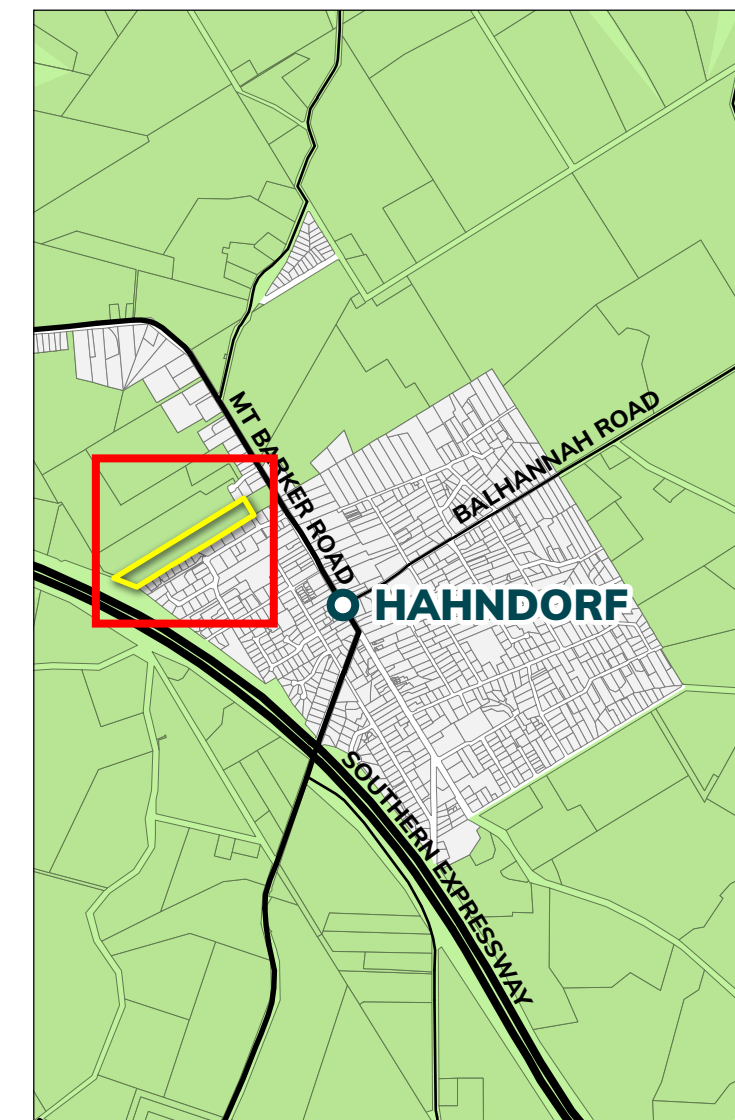
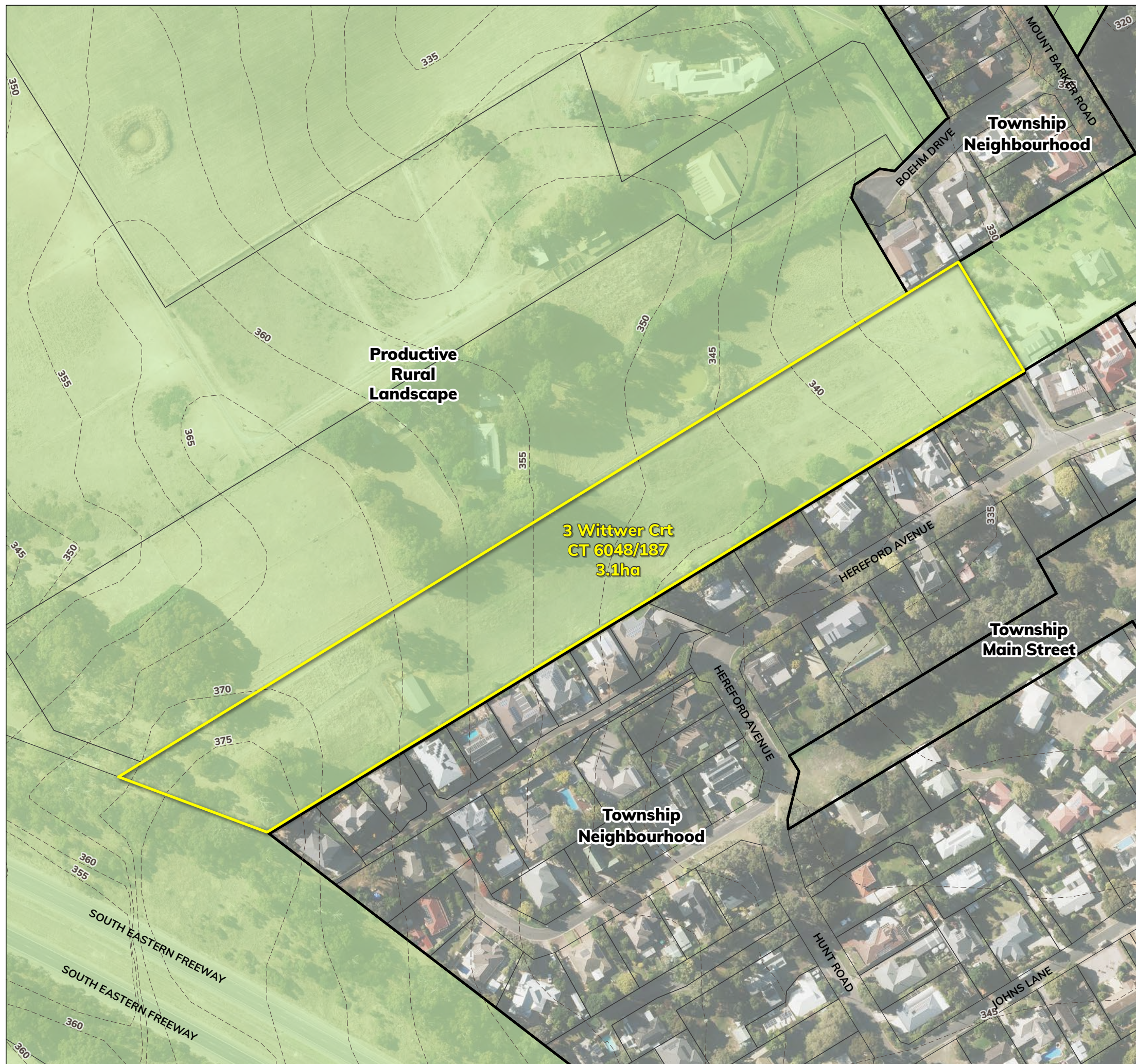
Att: Locality Plan

Appendix A - Township Land Supply – Adelaide Hills (June 2020)

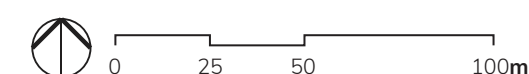
Source: Land Supply Report for Greater Adelaide (pg. 56)



Township	Development Ready (Zoned land greater than 4,000m ² with an approved or proposed plan of division)		Undeveloped Zoned (Zoned land greater than 4,000m ² , but no active plan of division)		Future Urban Growth Area	
	Area (ha)	Lots	Area (ha)	Lots	Area (ha)	Lots
Balhannah	-	-	4	28	-	-
Birdwood	1	5	6	37	-	-
Bridgewater-Aldgate-Stirling – Crafers	2	4	45	100	-	-
Callington	-	-	3	18	-	-
Charleston	2	15	11	82	-	-
Echunga	-	-	3	29	-	-
Gumeracha	-	-	3	20	-	-
Hahndorf	0	1	21	61	-	-
Inverbrackie	20	122	-	-	-	-
Kanmantoo	4	22	17	100	-	-
Lobethal	3	23	29	245	-	-
Macclesfield	1	8	13	107	38	309
Meadows	15	96	13	87	16	104
Woodside	1	4	5	34	-	-
Total	49	300	173	948	54	413



- Legend**
- Subject Site
 - Zone Boundary
 - Environment and Food Production Area
 - Contours



SCALE: 1:2,000 @ A3

LOCALITY PLAN

3 Wittwer Court, Hahndorf

JOB REF.	22ADL-1541
PREPARED BY.	MP
DATE.	06.10.23
REVISION.	1
DATA SOURCE.	MetroMap (18.03.2023) data.sa.gov.au

DTI:PlanSA Submissions

From: Rebecca Thomas [REDACTED]
Sent: Monday, 6 November 2023 12:13 PM
To: DTI:PlanSA Submissions
Cc: Lewis Smith; James Rhodes
Subject: Collectiv Group - GARP submission
Attachments: 01616-002_20231106_GARP Submission - Final .pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Attention: Growth Management Team, Planning and Land Use Services - Department for Trade and Investment

On behalf of our client, Collectiv Group, please find attached a submission in response to the GARP.

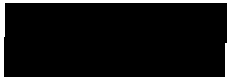
Should you need further information or have queries of clarification, please make contact at your convenience.

Kind regards,

Beck Thomas
Director

ekistics

Level 3, 431 King William Street, Adelaide SA 5000



www.ekistics.com.au

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

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6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

To whom it may concern,

RE: MIDDLETON LAND SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

Ekistics Planning and Design ('Ekistics') have been engaged by Collectiv Group who own land located at 94 Flagstaff Hill Rd, Middleton (the 'Site').

This submission has been prepared in response to the Greater Adelaide Regional Plan ('GARP') Discussion Paper and seeks the State Planning Commission's (SPC) consideration of the 'Site' as a potential future urban growth area. Specifically, we seek consideration of the site as a future Rural Living Zone.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper and for seeking stakeholder and community input to inform the preparation of the next Regional Plan for Greater Adelaide.

1. SITE & LOCALITY OVERVIEW

The subject site is located at 94 Flagstaff Hill Rd, Middleton and is formally recognised as Certificate of Title Volume 5977 Folio 750 (Allotment 2 Deposited Plan 72201). The title confirms the site is not subject to any easements, caveats, rights of way, etc. that may restrict the development of the land. The land is located within the City of Alexandrina and is depicted in Figure 1-1 over-page.

The site comprises one single allotment land holding measuring 36.94 hectares in area, with three road frontages; Airport Road and Flagstaff Hill Road, and Micheltore Road, an unsealed road. The land has a relatively gentle grade downward in a west to east direction (approx. 1-in-70 to 1-in-100).

The site is currently unused (with no commercial agricultural activities occurring on the land) and contains a shed and a dilapidated building which appears to have been formerly used as a dwelling. The site is relatively devoid of vegetation, with trees surrounding the former dwelling. The site does not contain native vegetation and has no significant environmental constraints. In addition, the site is currently connected to mains water and electricity infrastructure.



Figure 1-1 Subject site aerial photograph facing south to the Middleton township & rural residential allotments (c/- Domain, <https://www.domain.com.au/94-flagstaff-hill-road-middleton-sa-5213-2018245196>)

Middelton is positioned between the large regional towns of Victor Harbor and Goolwa, with Port Elliot, a smaller township located to the west. Middleton

The Middleton township sprawls in an east-west direction, capitalising on the proximity to the beach. The 'main street' is concentrated on either side of Goolwa Road, at the central-northern end of the township. The site is well connected to the township as Flagstaff Hill Road intersects Goolwa Road in proximity to a concentration of services and amenities. Flagstaff Hills Road and Airport Road provide direct access from the main street to the Victor Harbor-Goolwa Airport and are used as freight routes.

The site is located to the north of the Middleton township, separated by large allotments used for rural residential purposes, particularly to the south of the site, over Airport Road and adjoining the site to the south-east. The locality is characterised by rural and agricultural activities, including livestock holding, and cropping. A satellite image of the subject site in the context of the Middleton township is provided in Figure 1-2 over-page.

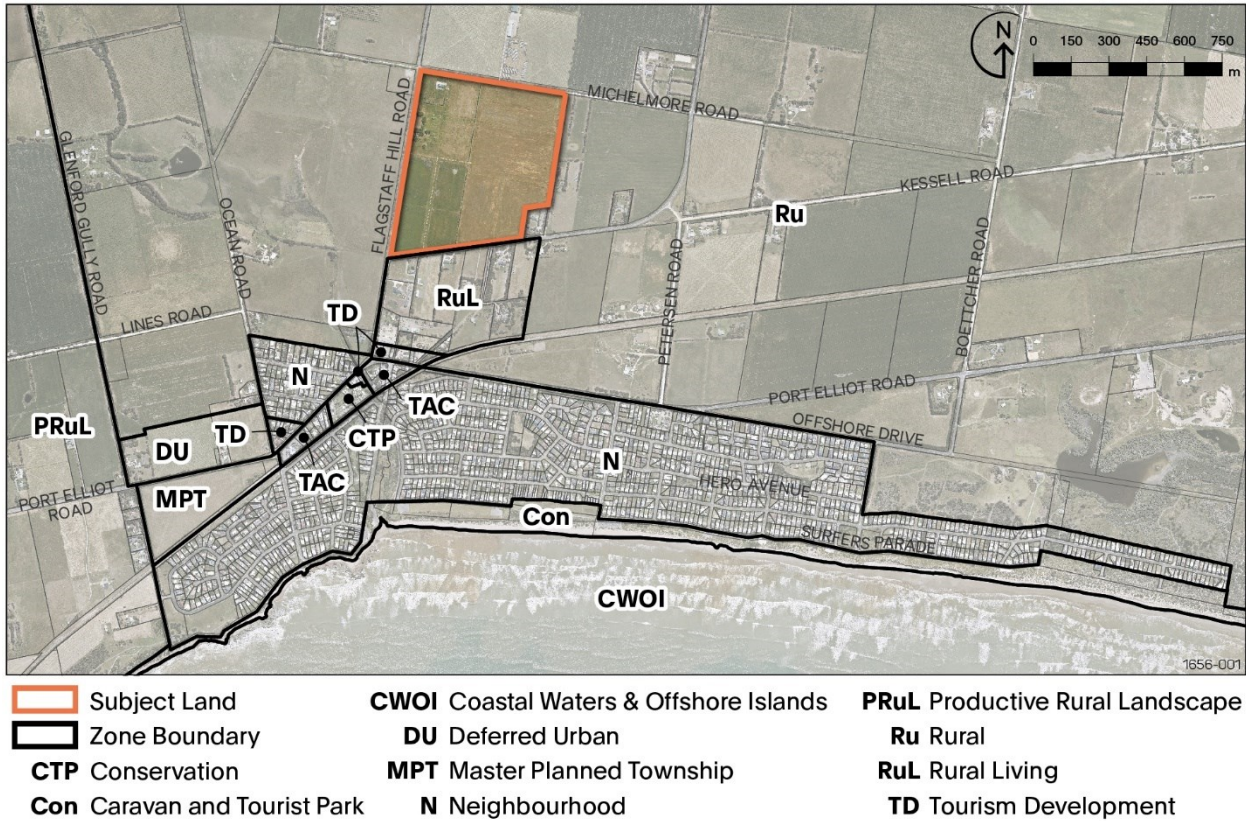


Figure 1-2 Site and Zoning Framework

2. CURRENT POLICY FRAMEWORK

The site is located within the 'Rural Zone', as identified within Planning and Design Code (Version 2023.15). The Rural Zone applies to land surrounding the subject site, with the exception of land to the south of the site, which is located within the Rural Living Zone. The zoning framework applicable to the site and immediate locality is illustrated in Figure 1-2 above.

The Rural Zone has the following Desired Outcomes:

DO 1 A zone supporting the economic prosperity of South Australia primarily through the production, processing, storage and distribution of primary produce, forestry and the generation of energy from renewable sources.

DO 2 A zone supporting diversification of existing businesses that promote value-adding such as industry, storage and warehousing activities, the sale and consumption of primary produce, tourist development and accommodation.

Dwellings are contemplated to be ancillary to primary production/agricultural activities situated on the land. Zone PO 5.1 seeks that dwellings do not compromise the "long term purpose of the zone for primary production or related tourism values due to a proliferation of dwellings." Further, the Limited Land Division Overlay contemplates that land division does not create additional allotments.

In addition, the following Overlays apply to the Site:

- Airport Building Heights (Aircraft Landing Area)
- Building Near Airfields
- Environment and Food Production Area
- Hazards (Bushfire – Medium Risk)
- Hazards (Flooding – Evidence Required)
- Limited Land Division
- Murray-Darling Basin
- Native Vegetation
- Prescribed Water Resources Area
- Water Resources

It is noted that no Technical & Numeric Variations (TNVs) apply to the Site.

Existing Legislative & Policy Constraints

Introduced in December 2017, 'Environment and Food Production Area' (EFPA) was established to protect valuable rural, landscape, environmental and food production areas surrounding Metropolitan Adelaide from urban encroachment. Land division for residential purposes must be refused within the EFPA, as per section 7 of the Planning, Development and Infrastructure Act 2016.

The Commission conducted a review of the EFPA boundaries in 2021 which resulted in the Commission declining to revise the boundaries of the EFPA, other than to address minor boundary anomalies, having formed the view that sufficient land remained available to support housing and employment growth for a projected 15-year timeframe.

Critically, the EFPA Outcomes Report acknowledges that the investigations conducted by the Commission did not consider land supply at the sub-regional level or specific forms of residential land supply (i.e. greenfield, township or urban infill).

That is, the assessment did not consider the distribution of population growth and the availability of land to service growth at a sub-regional level.

We note the EFPA boundaries must be reviewed every 5 years under section 7 of the Planning, Development and Infrastructure Act 2016, with the next review is scheduled for 2027.

3. GARP DISCUSSION PAPER

The Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper') indicates a projected growth in population within Greater Adelaide of 670,000 by 2051. This represents a 47% increase in Greater Adelaide's current population.

The Discussion Paper also forecasts the need to supply 300,000 new homes to meet this projected population increase and identifies that there is a current capacity for an additional 200,000 homes (164,000 homes in land already zoned for residential development and a further 47,000 homes that could be accommodated on land already identified for future residential rezoning). The Discussion Paper identifies the need to therefore supply an additional 100,000 homes by 2051 or, based on current estimates under a high growth scenario, we will run out of land for future residential development within 30 years unless an ongoing rezoning program is established.

The Commission states that growth areas will need to be geographically distributed (where possible), balance the costs associated with different land supply types, and offer flexibility in housing and lifestyle choice.

A key strategy outlined within the Discussion Paper is to focus greenfield, satellite city and township growth along Greater Adelaide's four major transport spines, as the "Sub-regions will have their own distinct part to play in Greater Adelaide's future" (Principle 2 for Identifying Land for Housing and Jobs). The southern spine travels from Metropolitan Adelaide along Victor Harbor Road and prioritises growth of the coastal towns of Victor Harbor and Goolwa. The GARP highlights that demand exists within this area as a 'lifestyle' alternative to metropolitan Adelaide. The GARP notes that "Further development would build on and leverage the current development activity that is already planned for Victor Harbor and Goolwa, anticipated to provide more than 10,000 additional dwellings." However, a challenge for growth in this area is that a significant amount of the investigation area is located within the Environment and Food Production Area. The GARP seeks to also maintain 'inter-urban breaks' between Victor Harbor, Port Elliot, Middleton and Goolwa to "maintain subregional identity".

In contrast to residential growth, the GARP nominates land between Middleton and Goolwa as an investigation area for future 'employment growth' to support the proposed residential/population growth at the end of the southern spine. This employment demand is expected to be for 'traditional industries' (e.g. manufacturing, waste services, & wholesale trades) as well as 'population serving' activities, including retail, education, health care, recreation and social services. The proposed growth investigation areas indicated in the Discussion Paper are illustrated in Figure 3-1 below.

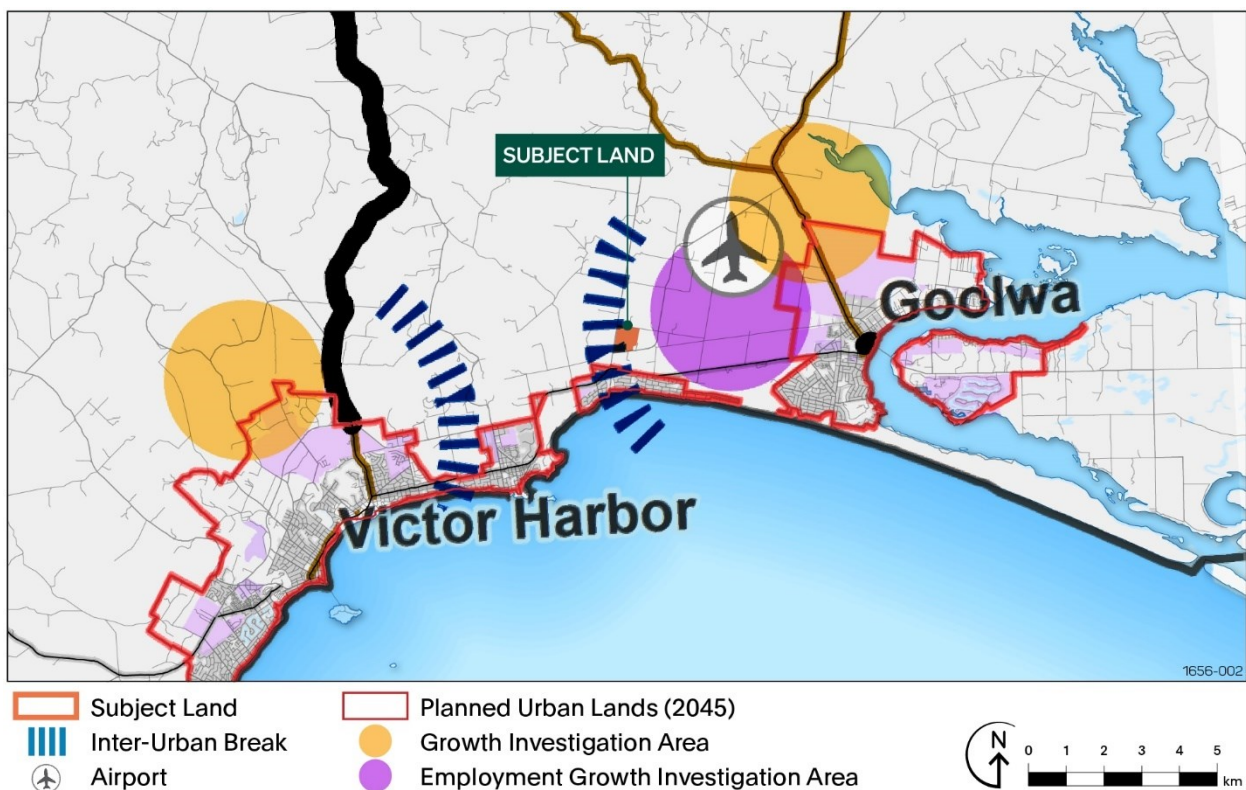


Figure 3-1 GARP Investigations Areas for the Victor Harbor-Goolwa region

4. SITE SUITABILITY FOR RURAL LIVING

On 16 October 2023, the State Planning Commission, issued a letter in relation to land rezonings for rural living purposes. The letter confirms that rural living style developments (accommodating allotment sizes of 1,200m²-20ha) will only be supported by the Minister for Planning where they have been identified within a Regional Plan and the Code Amendment is Council initiated.

The Commission has established the 'Principles for Rural Living Development' (the 'Principles') to assist the identification of suitable rural living land for the drafting of regional plans. The provisions seek to address concerns relating to the environmental, social and economic costs of such rural living developments, stating rural living development is to be limited to areas where it does not:

1. Impact the future expansion of the urban area/township
2. Result in the inefficient delivery of infrastructure and social services
3. Result in fragmentation of valuable productive land
4. Create land use conflicts that affect the productivity of nearby lawfully operating land uses

Recognising the sensitivity of rural living development, we have addressed the future use of the subject site for rural living purposes against these Principles below, categorised into subheadings.

1. Impact on Future Township Expansion

The subject site would accommodate growth of the Middleton township to the north, rather than east or west, thereby retaining the 'inter-urban breaks' contemplated on the southern spine. Subsequently, township growth on the subject site will maintain the distinct identity of the Middleton township and ensure land between Victor Harbor and Goolwa does not 'merge' into one continuous urban area.

The designation of the subject site for rural living purposes represents a modest extension to the existing Rural Living Zone (as per Planning and Design Code Version 2023.15), forming one contiguous Rural Living Zone. Should the land be used to accommodate standard residential greenfield growth, such development would be fragmented from the township by the existing Rural Living Zone, an outcome expressly stated to be undesirable. Accordingly, one contiguous rural living area is more appropriate.

Future township growth in the next 30 years will not be jeopardised as short to mid-term growth in Middleton will be accommodated by typical greenfield development on land within the Deferred Urban Zone and recently rezoned Master Planned Township Zone at the western fringe of Middleton (implemented in the Code on 12 October 2023). Additional growth will not be restricted/obstructed by rural living development on the subject site, given the availability of land to enable growth of the existing township to the north, over Goolwa/Port Elliot Road.

Interestingly, as the Middleton township is not currently connected to mains sewer nor a community wastewater management system (CWMS), the recent (October 2023) rezoned Master Planned Township Zone (west of the township)

suggests a minimum allotment size of 1200m² to ensure sites are able to accommodate an onsite waste water system (DPF 11.2). This minimum allotment size coincidentally is the same as the minimum 'rural living' allotment size noted by the Commission. Therefore, such development has been considered appropriate by the Minister at the western edge of the Middleton township.

In summary, an extension to the existing Rural Living Zone would not curtail appropriate growth of the Middleton township and as such, the proposal achieves Principle 1.

2. Delivery of Infrastructure and Social Services

The subject site, if used for rural living purposes, would subsequently form one contiguous rural living area and therefore results in the efficient delivery of infrastructure. The site can capitalise on established infrastructure, including overhead electricity transmission lines and mains water, both within the Airport Road reserve.

As mentioned above, the township of Middleton is currently not connected to mains sewer nor a community wastewater management system (CWMS). This was not deemed fatal to the recently approved Middleton Code Amendment which rezoned land for future growth. Similarly, the resulting 1,200m² sized allotments of a Rural Living Zone are more than adequately sized to accommodate individual wastewater systems.

The subject site is well connected to the main street and associated services/amenities provided within the Middleton township, due to its geographically close position, and direct road access provided via Flagstaff Hill Road. In fact, the subject site is located closer to the main street than some residential properties in the eastern portion of the township as indicated in the following image.

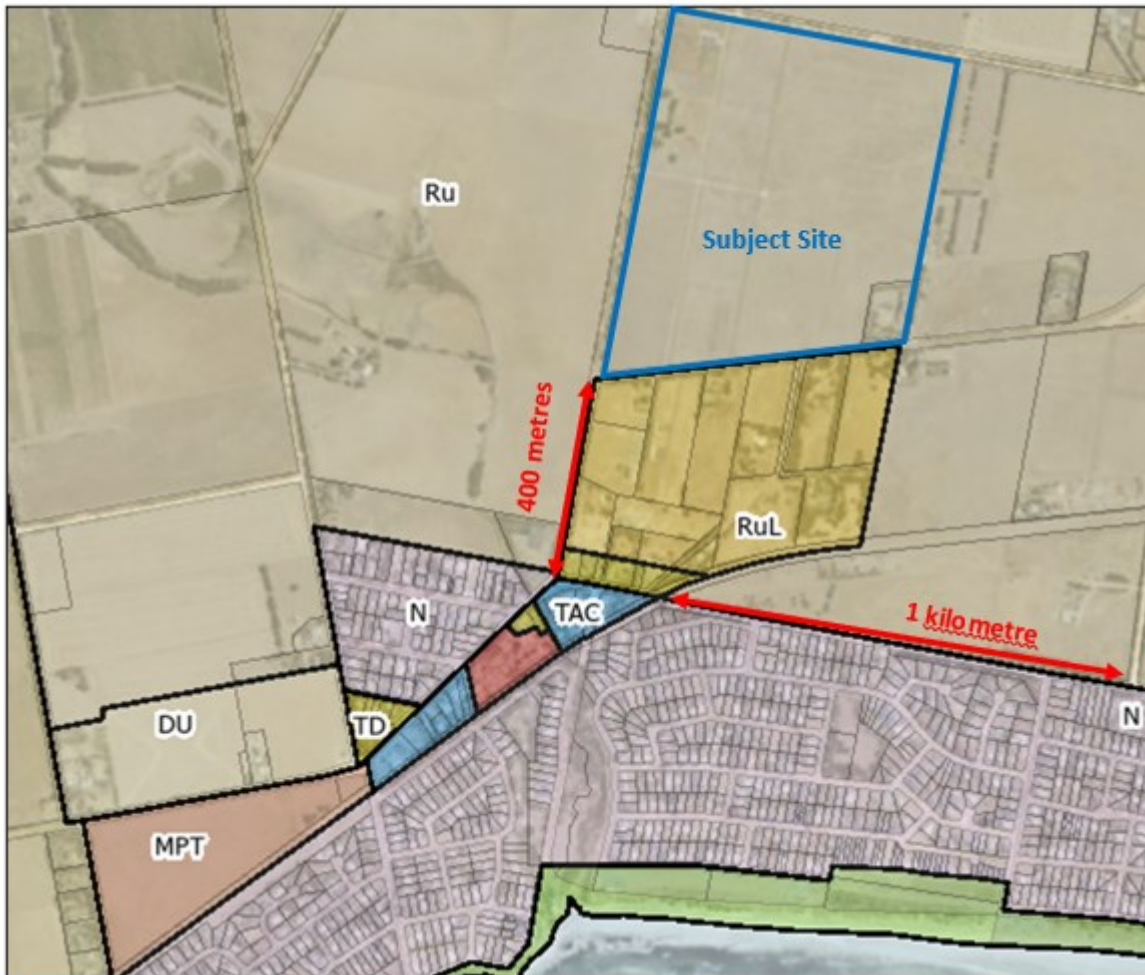


Figure 4-1 Proximity of site to township and services

Established transport infrastructure adjacent the site includes Flagstaff Hill Road and Airport Road, both sealed roads, which provide access to the Victor Harbor-Goolwa Airport and to Goolwa/Port Elliot Road. This infrastructure ensures the larger townships of Goolwa and Victor Harbor and their associated concentration of amenities, services and institutions are readily accessible from the site.

Lastly, noting the relatively limited north-south spread of the township, future rural living development is located in proximity to public open spaces (parks and beaches) and the Encounter Bikeway, a shared path (cycling & walking) between Victor Harbor and Goolwa.

In summary, the site can be efficiently connected to essential utilities and is accessible to local social, retail and transport services. No substantial augmentation to utilises is anticipated and wastewater for modest scaled rural residential dwellings can be accommodated within future allotments.

3. Fragmentation of valuable productive land

The proposed designation of the land for future rural living development represents a logical continuation of the existing Rural Living Zone. Given land to the south and scattered land to the east comprises rural residential uses, we do not expect that the use of the subject site as rural living land will fragment valuable primary production land.

It is envisaged that land to the west, north and east can continue to be used for primary production purposes, with such allotments not 'surrounded' by residential development or even 'separated' from existing primary production land.

The land is currently nominated as within a PIRSA Primary Production Priority Area, albeit at the western extremity (refer to Figure 4-1 below). We expect this Primary Production Priority Area to the east of the site will be removed in future noting the contemplated future employment growth in this area.

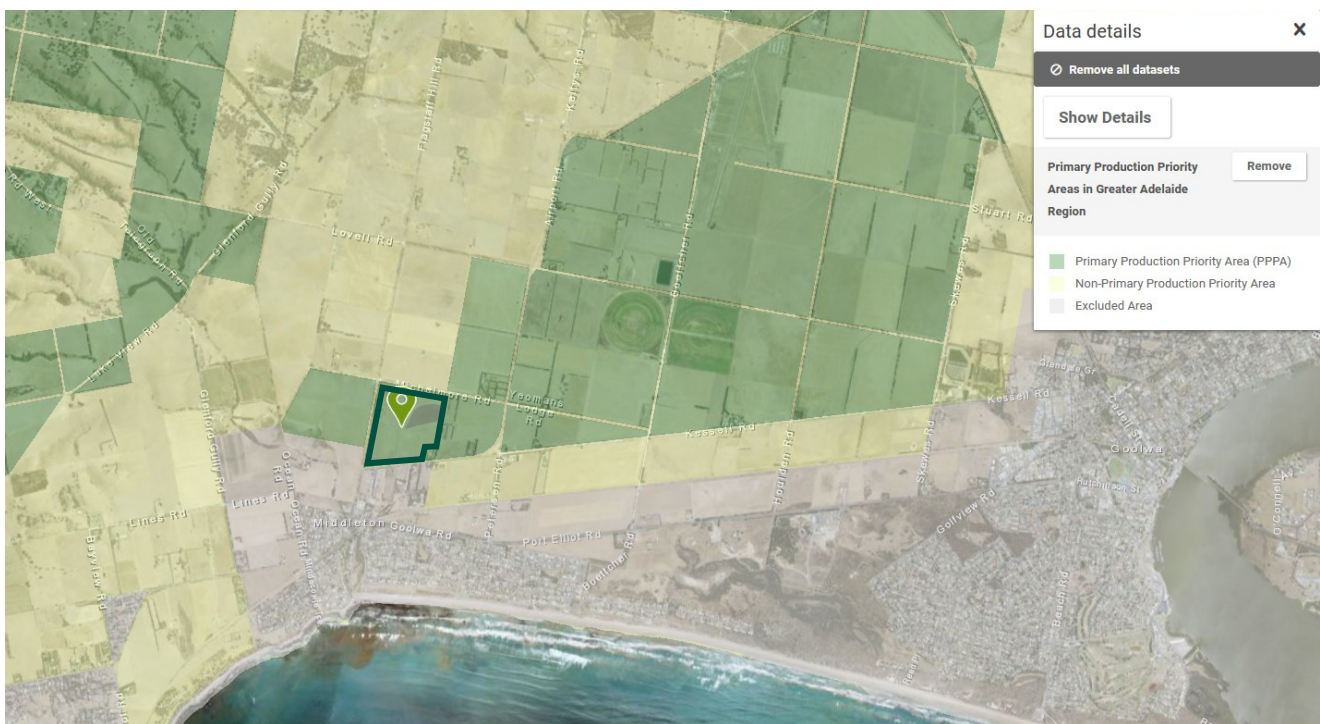


Figure 4-2 Primary Production Priority Areas (green outline refers to the subject site)

In summary, while the land may have some primary production value, its proximity on the fringe of the Middleton township lends itself to low density rural lifestyle lots and this conversion will not result in any consequential loss of productive land.

4. Land Use Conflicts

The proposed low density rural residential use of the land is not expected to conflict with existing land uses within the locality. In contrast to typical 'urban' greenfield development, a very low density residential development is expected to have negligible reverse amenity impacts on the productivity of lawfully operating primary production land in the locality.

Modest, sensitive growth on the site as rural living land will provide an appropriate transition to primary production land, given rural living allotments are between 1,200m²-20ha in site area and typically accommodate a centrally located detached dwelling, outbuilding/s and the substantial planting of vegetation and trees, particularly along site boundaries.

Further, rural living allotments on this land will provide an appropriate transition from residential 'urban' land to the employment lands envisaged to be positioned to the east (as illustrated in Figure 3-1).

In summary, rural living lots are often used as an appropriate transition to farming land as their size facilitates appropriate separation of land use impacts and minimises conflicts that might otherwise affect the productivity of nearby lawfully operating land uses.

Additional Considerations

The future designation of the site for use as 'Rural Living Broadhectare' land in a high demand area, would provide an alternative product offering to the additional 10,000 additional dwellings currently anticipated for the Victor Harbor-Goolwa region. Therefore, this rural living growth would contribute to flexibility and diversity in housing and lifestyle choices, as contemplated by the Commission's Principles for Identifying Land for Housing and Jobs (in the GARP).

We are aware of significant demand for rural lifestyle properties in this location and consider it appropriate that the State's growth strategy cater for a range of allotment sizes and accommodation options to ensure future populations have choice.

Further, and importantly we note the land:

- does not accommodate any areas of high landscape or environmental significance;
- is not within a Significant Landscape Protection area (noting such an Overlay is located some 1.5km to the west);
- does not contain and is not adjacent to any Local or State listed heritage listed places;
- is not within the Character Preservation District;
- Is not within a High Bushfire risk Hazard Overlay;
- Is not impacted by flood risk and does not contain any identified waterways or water resources;

5. SUMMARY/REQUESTED AMENDMENTS

This submission has been prepared in response to the GARP Discussion Paper, on behalf of Collectiv Group who own land located at 94 Flagstaff Hill Road, Middleton. We have reviewed the Discussion Paper in the context of their desire to develop the land for rural living purposes in future.

As noted within the GARP Discussion Paper, much of future growth areas on the southern spine are currently constrained due to the application of the 'Environment and Food Production Areas' (EFPA). Accordingly, we request the GARP nominates the subject site as a rural living growth area (or 'Rural Living Broadhectare' on the SA Property & Planning Atlas) and this will inform the next scheduled review of the EFPA boundaries. This EFPA review must balance the need to supply

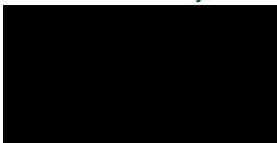
housing in the right locations while maintaining the need to protect valued primary production land. When the Commission considers the timing to be appropriate, the site can be removed from the EFPA to enable a future rezoning process to occur. A new policy framework can facilitate the anticipated rural living growth.

As outlined above, it is our opinion that the subject site is suitable for future urban growth in the form of rural living development in that this use:

- Will not detrimentally impact the future expansion of the Middleton township;
- Maintains the 'inter-urban breaks' contemplated within the GARP;
- Represents a modest expansion to the existing Rural Living Zone north of the Middleton township;
- Will not result in the inefficient delivery of infrastructure and services, rather, capitalising on existing road, water and electricity infrastructure and proximity to the 'main street' of Middleton
- Will not result in the fragmentation of valuable productive land following the establishment of the envisaged employment lands to the east;
- Will not create land use conflicts that affect the productivity of nearby lawfully operating land uses, instead, providing an appropriate transition to primary production land and future employment lands; and
- Will contribute to the provision of a variety of housing and lifestyle choices on a land holding with no significant environmental constraints.

We respectfully ask that this submission informs the preparation of the draft and final Greater Adelaide Regional Plan. Please do not hesitate to contact the undersigned on [REDACTED] should you wish to discuss the above submission further.

Yours sincerely,



James Rhodes
Planning Consultant

DTI:PlanSA Submissions

From: Christopher Webber [REDACTED]
Sent: Friday, 3 November 2023 4:24 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP Submission - Dalkeith Road Community Group - Kudla.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Good afternoon,

Please find attached submission to the Greater Adelaide Regional Plan Discussion Paper on behalf of the Dalkeith Road Community Group.

Kind regards,

CHRISTOPHER WEBBER
Senior Consultant



[REDACTED]
[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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November 3, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001

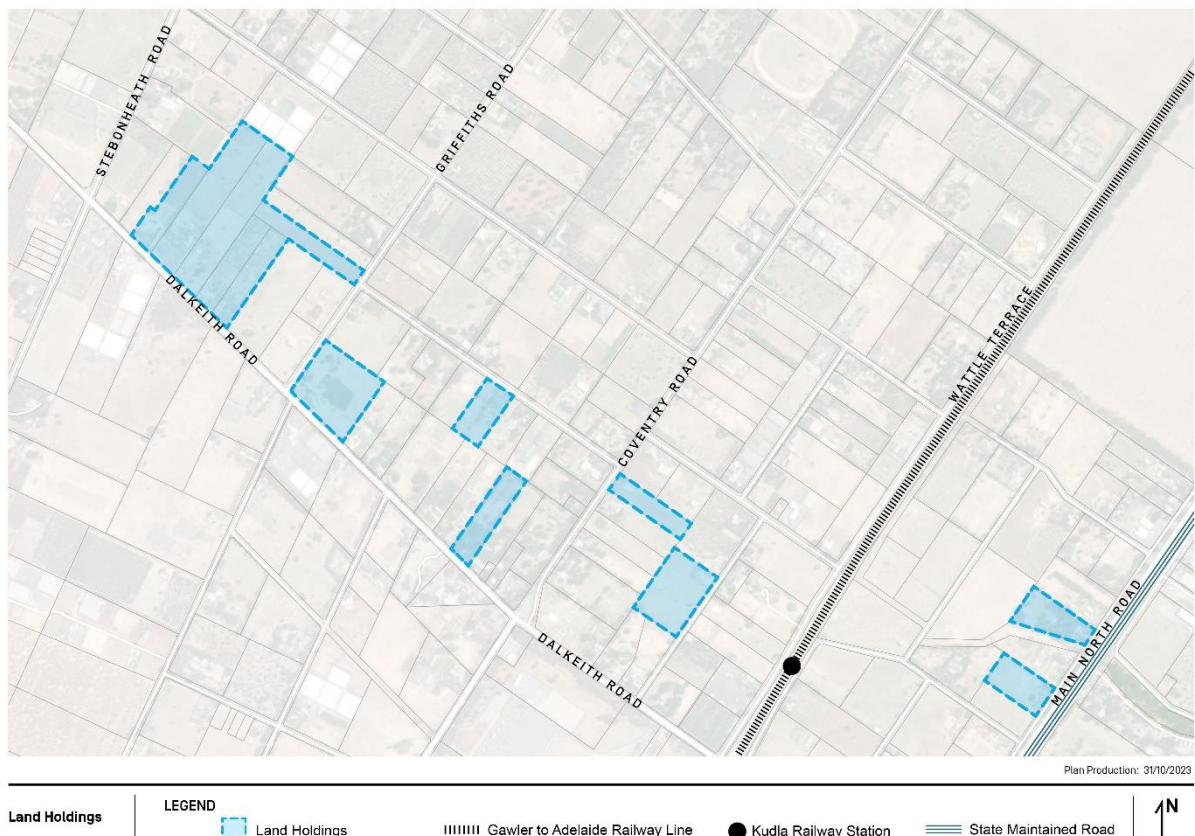
Via email: plansasubmissions@sa.gov.au

SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We write on behalf of the Dalkeith Road Community Group ('the Proponent'), which is made up of multiple land owners within the suburb of Kudla.

The Proponent has interests in a total of 14 land holdings as identified in **Figure 1 below**. Collectively, the land holdings represent over 20.4 hectares in area.

Figure 1 *Proponent Land Holdings*



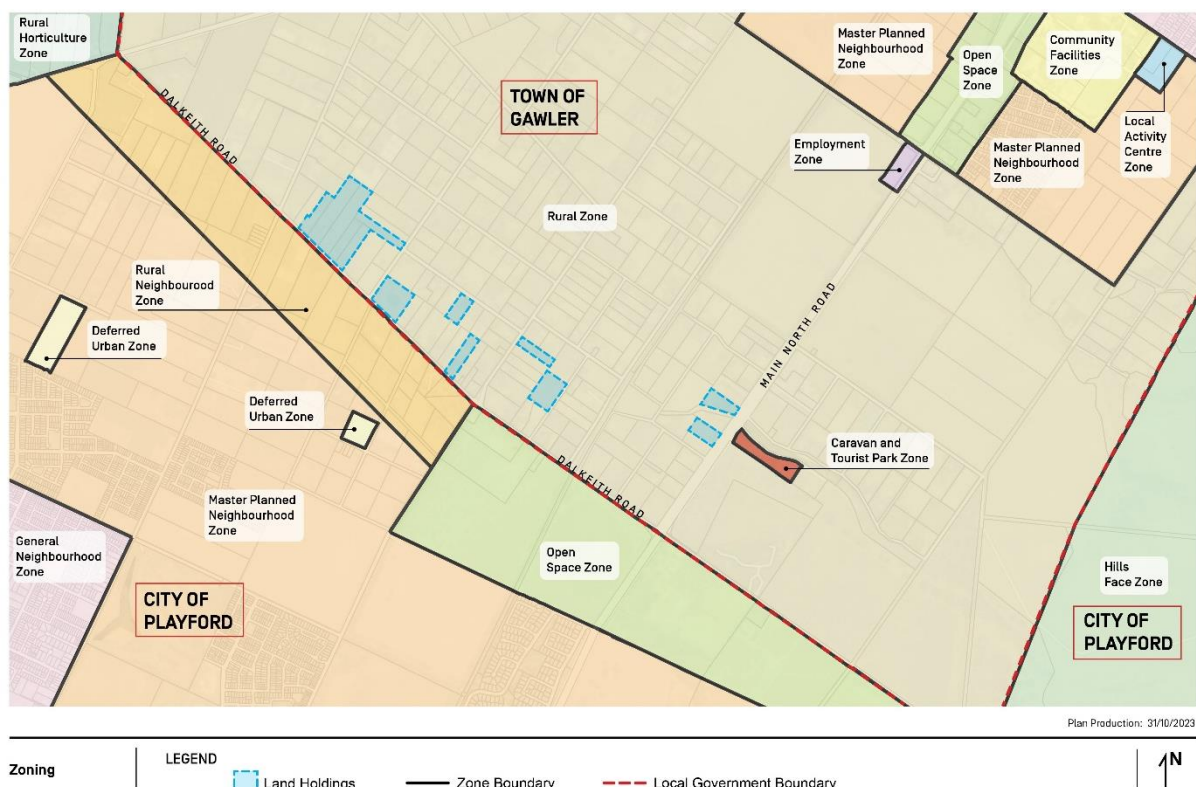
Current Planning Context

The Proponent's land holdings are all located within the Rural Zone of the current version of the Planning and Design Code (Version 2023.15) as shown in **Figure 2** below.

The Rural Zone seeks that land division, including boundary realignments, promotes productive, efficient and sustainable primary production. A local variation ('TNV') also applies, which seeks that allotments are to have an area not less than 9,000 sqm. Such would not currently support master planned urban growth opportunities.

It is also noted that the suburb of Kudla is adjoined by the Rural Neighbourhood Zone and the Open Space Zones to the south, within the City of Playford Local Government Area.

Figure 2 Zoning



The current 30-Year Plan for Greater Adelaide does not identify Kudla as a future urban growth area.

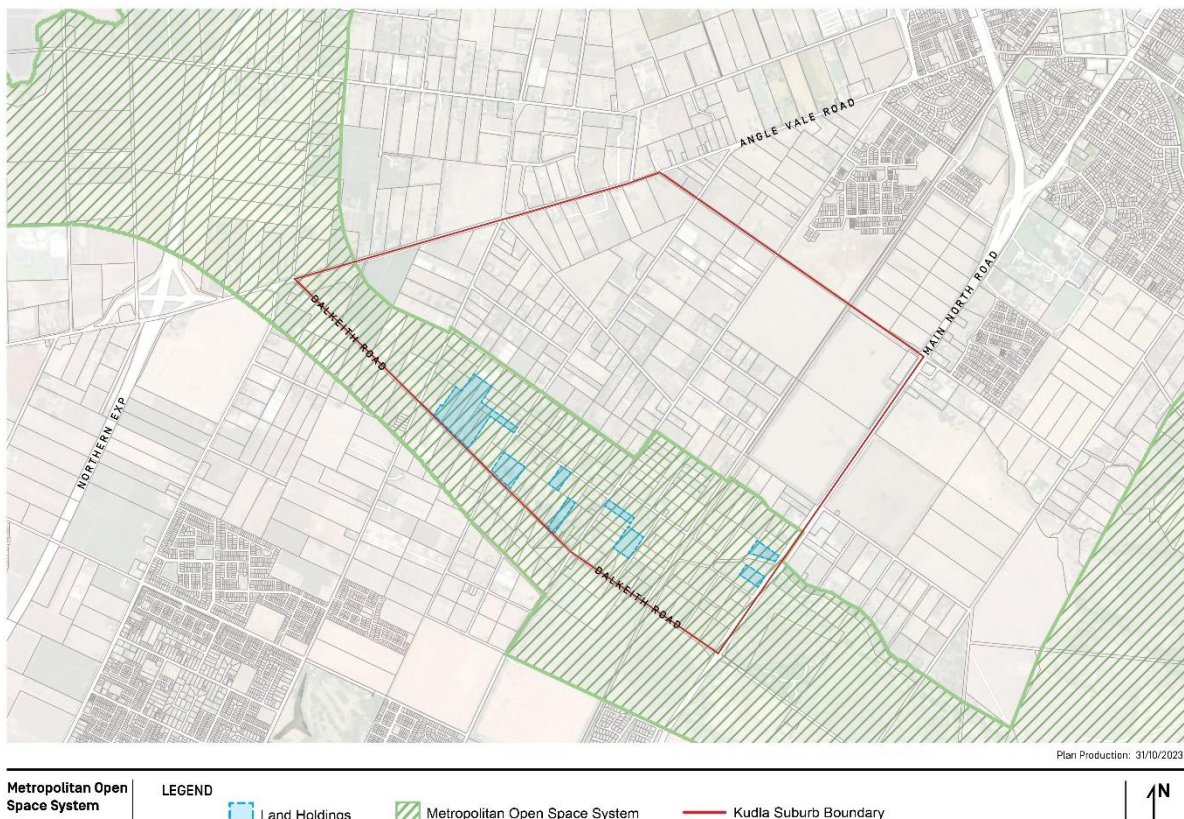
The southern portion of Kudla has however been identified as part of the envisaged Metropolitan Open Space System ('MOSS'), which includes all of the Proponent land holdings as shown in **Figure 3**.

Policy 98 is the only policy of the 30 Year Plan which speaks to the MOSS under the strategic vision for open space, sport and recreation, which states:

Provide for a Greater Adelaide open space framework that builds on the Metropolitan Open Space System (MOSS) to create quality open space across the region. The open space will feature urban forests and parks, watercourse and coastal linear parks, trails, greenways, shared use paths and green buffers, and sustainable recreation and sporting facilities.

The extent of the MOSS envisaged for Kudla in the 30 Year Plan has not been translated into the current zoning under the Planning and Design Code.

Figure 3 Metropolitan Open Space System



Greater Adelaide Regional Plan Discussion Paper

Following our review, the Greater Adelaide Regional Plan ('GARP') Discussion Paper includes the following strategic growth aspects relevant to the suburb of Kudla and the Proponent's land holdings:

- Kudla is identified as part of a growth investigation area to provide an opportunity for a master planned extension to the Gawler township;
- establishment of an inter-urban break in the form of new northern parklands that separate Gawler from the City of Playford and provide new public open space and recreation opportunities; and
- expand on the MOSS framework to support an interconnected network of public open spaces and provision of inter-urban breaks to separate and define distinct townships and urban areas. The extent and alignment of the MOSS in **Figure 3** above is consistent with that shown in the GARP Discussion Paper.

The Proponent supports the State Planning Commission's ('SPC') identification of Kudla as a growth investigation area for a master planned extension to the Gawler township that takes advantage of recent, significant government investments in electrified rail.

It is agreed that Kudla is well positioned to provide an increased housing supply that can leverage off the Kudla railway station and other nearby key transport routes that provide convenient connections to the Adelaide CBD and the Gawler township, including Main North Road and the Northern Expressway (via Angle Vale Road). Kudla therefore presents an excellent opportunity to provide sustainable, transit-orientated development outcomes and high-quality living opportunities.

The Proponent requests a future ‘neighbourhood-type zone’ for the suburb of Kudla to assist in realising opportunities for residential growth and providing an orderly extension to the Gawler township. Landowners currently living in Kudla find it to be a desirable place to live, being close to both Gawler and their workplaces, where a future ‘neighbourhood-type zone’ would allow existing residents to keep living in their homes while also giving them the opportunity to develop their land over time in a manner that supports future residential growth.

Whilst the Proponent supports Kudla being identified as a growth investigation area, they do not support the establishment of an inter-urban break for this suburb. Introduction of an inter-urban break would stifle opportunities for accommodating future urban growth around key transport infrastructure nodes within Kudla as above mentioned. It would also be particularly remiss of the SPC to let land with Kudla remain underutilised within proximity to the electrified Gawler line given the significant investment made by Government to date (reportedly in the order of \$842 million).

It is unclear the size and extent of the intended inter-urban break from Figure 9 of the GARP Discussion Paper however it does appear to cover a significant portion of Kudla, including the railway station and majority, if not all, of the Proponents land holdings where it would be detrimental to optimising an uplift in housing supply in proximity to key transport networks.

We consider the intent of the inter-urban break could rather be effectively delivered through the existing Open Space Zone to the south, within the City of Playford LGA as shown in **Figure 2** above. Such would also support the intent and alignment of the MOSS (extent shown in **Figure 3** above) if the Rural Neighbourhood Zone to the west is also included to facilitate the envisaged interconnected network of public open spaces.

The Open Space Zone and Rural Neighbourhood Zone within the City of Playford LGA is less fragmented, comprising far less land holdings than within Kudla and thereby provides greater opportunity for open space delivery as well as the envisaged definition between townships without significant loss to potential housing supply.

Furthermore, the practicality of achieving the vast extent of the MOSS into Kudla is also flawed for the following reasons:

- such would require significant land acquisition;
- there will be a significant increase in maintenance costs to the community, noting the Town of Gawler’s current limitation in maintaining the current open space assets (see commentary below); and
- it would be a lost opportunity for increasing housing supply in proximity to a high frequency rail network.

The Town of Gawler’s *Open Space Asset Management Plan* (dated August 2022) particularly notes concerns in respect to servicing their current open space assets which states there is insufficient funds planned to continue to provide existing services at current levels, “*mainly due to the associated increase of operation and maintenance costs for new assets*”. As a result, the Open Space Asset Management Plan suggests “*upgrading existing open space facilities instead of creating new assets*” as a potential solution for managing the extent of existing open space within the Council area.

Notwithstanding, we commend the SPC’s intent to enhance access to a connected open space network, particularly within proximity to Kudla as such is critical for urban growth and providing a high-quality living environment for current and future residents.

We submit that an appropriately sized open space network can be delivered through the current statutory provision of 12.5 per cent open space for the division of land into more than 20 allotments under Section 198 of the *Planning, Development and Infrastructure Act* and guided by an amended or new Open Space Guidelines/Strategy at the local level to provide a coordinated and connected network of open space.

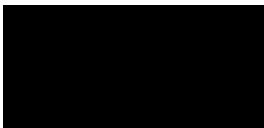
The Proponent particularly supports the intent for a northern parklands and regional sporting hub in the area as identified in the GARP Discussion Paper provided such is developed on existing government owned land and not on land acquired or owned by the land owners within Kudla.

Summary

In summary, the Proponent submits the following key points to the SPC:

1. Support for Kudla being identified as a 'Growth Investigation Area'.
2. A future neighbourhood-type zone is requested for the Kudla area to best realise residential growth opportunities.
3. Request removal of the 'Inter-Urban Break' as the intent of such can be effectively delivered through the existing Open Space Zoning to the south, within the Playford LGA.
4. The intent for a northern parklands and regional sporting hub in the area is supported provided it is developed on existing government owned land, not on land acquired or owned by private land owners in the area.

Yours sincerely,



Christopher Webber
Senior Consultant

DTI:PlanSA Submissions

From: Belinda Monier [REDACTED]
Sent: Wednesday, 11 October 2023 3:47 PM
To: DTI:PlanSA Submissions
Cc: Chloe Vounasis
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP DP Submission on behalf of Emmett Property.pdf

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Good afternoon,

Please find attached a submission on the Greater Adelaide Regional Plan Discussion Paper on behalf of Emmett Property Pty Ltd.

Kind regards,

BELINDA MONIER
Senior Consultant



[REDACTED]
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A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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October 11, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001

Via email: plansasubmissions@sa.gov.au

SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for Emmett Property Pty Ltd ("the Proponent"). The Proponent is seeking a Code Amendment over 63.5 hectares of land bound by Mill Road, Heaslip Road and Greyhound Road in Waterloo Corner. The land holding is identified in Figure 1 below and is currently identified in the 30-Year Plan for Greater Adelaide as 'new strategic employment lands'.

The Proponent intends to rezone all of the land from the existing Rural Horticulture Zone to the Strategic Employment Zone.

Figure 1 *Land holding*



The Greater Adelaide Regional Plan Discussion Paper maintains the strategic vision for the area and identifies the Affected Area as 'Future Employment Land'. The Proponent supports this inclusion in the Greater Adelaide Regional Plan and commends the State Planning Commission (SPC) for recognising the critical role that employment lands play in South Australia's economy.

While the Proponent supports the position of SPC, it notes there is very little detail in regards to employment land data. The Discussion Paper states that there is an estimated 25-44 years of employment land supply, however, the amount of vacant employment land is not identified. While the Land Supply Report has been recently released for residential land, the latest Employment Land Supply Report is dated 2021 and was based on data prior to the introduction of the Planning and Design Code. Data in that report is highly skewed by land in Gilman, which is largely not development ready, however, is shown as vacant. The report also shows the Bolivar Wastewater Treatment Plant as employment land, which accounts for 1,245 hectares of land.

The Employment Land Supply Report needs to be updated to reflect the Planning and Design Code and current data sets. We now have an online planning system with capabilities of supplying real time data and the new GARP should be based on the most recent data, which is particularly critical post the COVID-19 pandemic. New employment land analysis should also factor in the impending completion of the North-South Corridor.

Location is a critical factor in employment land investment and we strongly urge the SPC to not view land supply in large regions. For example, the Outer North Region has sub-regions, most relevantly in this case, Greater Edinburgh Parks (GEP). GEP has different locational attributes to say Roseworthy, that would drive significant investment to a level considerably higher than Roseworthy, should development ready land be made available. The Discussion Paper rightly identifies that since COVID-19, there is increased demand for manufacturing and warehousing as we reduce our reliance on overseas supply chains. These land uses are ideally located next to freight connections. This means that any land in close proximity to the North-South Corridor is likely to be in high demand.

According to the Knight Frank National Industrial Report August 2023, Adelaide recorded the highest quarterly industrial prime rental growth over Quarter 2, 2023. The report provides an insight into the demand and strong growth of the industrial sector in northern Adelaide:

"The main storyline of Adelaide's industrial market of late, has been the emergence of the northern precincts as market heavyweights, particularly the Outer North... The Outer North's allure for development is primarily driven by its accessibility and cost-effectiveness of land, bolstered by the north/south connector. As a result, the Outer North precinct is expected to see a surge in investment and development activity in the forthcoming years." (pg 12)

However, this growth cannot occur if there is no available zoned land. Anecdotal evidence suggests that there is actually less than 5 years of supply in the Greater Edinburgh Parks area. For such a significant strategic area in close proximity to key infrastructure, the release of new employment land is critical and necessary to satisfy demand, and importantly, support the strong residential growth that is occurring in the region.

The Proponent is prepared to commission a report on the economic benefits to the State should land in the region be rezoned for strategic employment purposes. Such could assist both the Salisbury and Playford Councils and the State to table these broader economic benefits at Federal level for future infrastructure funding.

The Future Employment Land in northern Adelaide has been recognised as such since the 2010 version of the 30-Year Plan. With the introduction of the *Planning, Development and Infrastructure*

Act 2016 (PDI Act), and the ability for private landowners to pursue Code Amendments, the Future Employment Land in the northern region has become highly sought after and is currently being pursued by various Proponent-led Code Amendments.

The Proponent will propose a Code Amendment that seeks to rezone the land from the Rural Horticulture Zone to the Strategic Employment Zone and has yet to lodge the Proposal to Initiate. We are aware that there are a number of other Proponents seeking to rezone land within the area identified in the Discussion Paper.

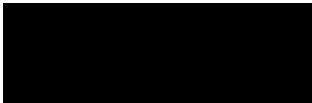
The Proponent is aware that infrastructure upgrades are required at a regional level and must be coordinated. A working group has been established to bring together the City of Playford, City of Salisbury, Department for Infrastructure and Transport, SA Water and other consultants facilitating Code Amendments in the wider area.

The Proponent is committed to continue working with the appointed working group to resolve infrastructure at a regional level, however, progressing the Code Amendment can occur concurrently with this process to ensure that land can be brought to market as quickly as possible.

In summary, it is suggested that SPC:

- Update the Employment Land Supply Report to reflect the Planning and Design Code and current data sets;
- Consider land supply in the context of sub-regions to provide a clearer picture of supply and demand within comparable geographic areas; and
- Expediate the release of new employment land to satisfy demand and support the strong residential growth that is occurring in the region.

Yours sincerely,



Chris Vounasis
Managing Director

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 8:37 AM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP-Discussion-Paper-Submission-Callington.pdf

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper
Customer type: Other
Given name: Stephen
Family name: Holmes
Organisation: Holmes Dyer Pty Ltd
Email address: [REDACTED]
Phone number: [REDACTED]
Comments: See attached submission regarding Lot 1 Callington Road, Callington.
Attachment 1: GARP-Discussion-Paper-Submission-Callington.pdf, type application/pdf, 1.1 MB
Attachment 2: No file uploaded
Attachment 3: No file uploaded
Attachment 4: No file uploaded
Attachment 5: No file uploaded
Sent to proponent email: plansasubmissions@sa.gov.au

6 November 2023

Reference: 0881

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001

Attention: Growth Management Team

By Email: plansasubmissions@sa.gov.au

Dear Growth Management Team,

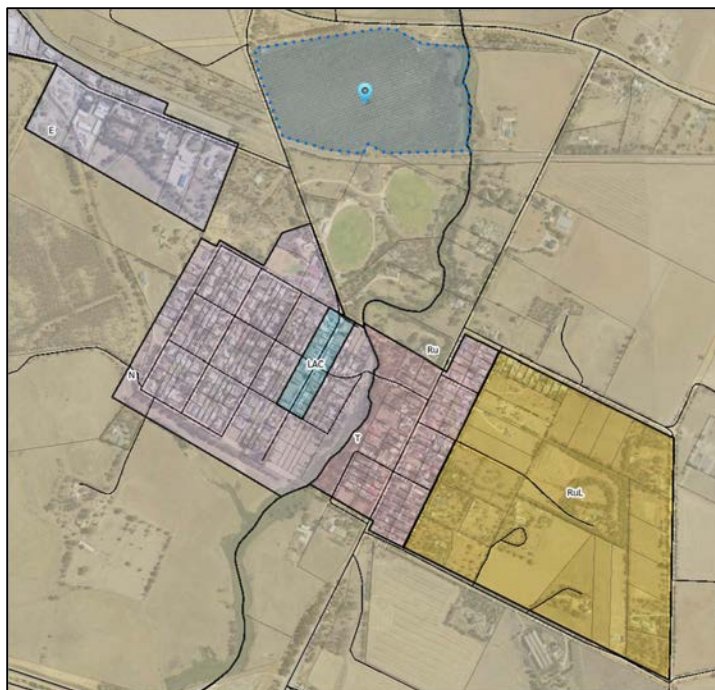
LOT 1 CALLINGTON ROAD, CALLINGTON

We provide this submission on behalf of our client, Mr Frank Catanzariti, the landowner of Lot 1 Callington Road, Callington, in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper that is currently on exhibition.

Lot 1 Callington Road comprises 16 hectares of land located just outside the main Callington township and is situated to the north of the existing railway line. The land is zoned Rural and is located within the Environment and Food Production Area. Land uses within the vicinity of the site consist of the Old Princes Highway to the north, residential dwellings on large open paddocks to the east and west, and the Callington Oval and Recreation Centre adjacent the railway line to the south.

The site is identified in blue below.

Figure 1. Lot 1 Callington Road, Callington



Analysis of aerial imagery indicates that residential land within Callington is gradually reaching capacity, with only twenty-nine (29) vacant allotments available within the main township, along with nine (9) vacant allotments within the Rural Living Zone.

Figure 9 Proposed Areas of Investigation within the GARP Discussion Paper identifies two areas of Planned Urban Lands (2045) around the Callington township.

As depicted below, these areas include the Callington township itself along with an area of Strategic Employment-zoned land to the east which will be investigated for new employment land purposes. The existing railway running through Callington has been identified as a “Potential Mass Transit” route, connecting Callington to the existing Belair station to the west and Murray Bridge to the east.

Figure 2. Planned Urban Lands (2045)



Source: Figure 9 – Proposed Areas of Investigation (Greater Adelaide Regional Plan)

In the event the Potential Mass Transit route is realised, the recommissioning of the railway line would enable opportunities for respective stations (such as Callington station) to reopen, and therefore it is considered that land located adjacent existing townships and within the vicinity of the identified Potential Mass Transit corridors should be identified as a future Growth Investigation Area within the GARP.

As detailed above, available residential land within Callington is gradually reaching capacity. Lot 1 Callington Road represents an opportunity for the provision of additional urban land in close proximity to the existing township (508m) and importantly, the Callington Railway Station (160m).

The proximity of the site to existing facilities and services (such as Callington Oval and Recreation Centre, Callington Kindergarten, and Callington Primary School) further highlights the logic of the site forming an orderly and economical extension of the township.

Callington is located within the “Eastern Spine”, being an area identified for investigation of future housing and employment growth given its location along a major transport spine.

Additionally, we further note that the area around Callington has been specifically identified as an area to “be investigated for future employment land”.

The GARP Discussion Paper also highlights the notion of “Living Locally” as a key theme of the paper. The paper talks about “connected, convenient, cohesive and climate-smart communities, reducing the need for long distance travel and living and working locally”. Callington has been identified for possible employment growth, so, consistent with the living locally theme, Callington should also be identified as an area provide residential development options to support that employment growth.

The possible re-establishment of passenger train services gives further credence to the suitability of Callington for residential growth.

It is therefore requested that the GARP is amended to identify Lot 1 Callington Road, Callington, as being within a future Growth Investigation Area due to its proximity to a Potential Mass Transit corridor.

Yours sincerely,



Stephen Holmes
Director

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 30 October 2023 2:33 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper

Customer type: Member of the public

Given name: Francisco

Family name: Grillo

Organisation: Land Owner

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Good afternoon PlanSA Submissions, Regarding the currently zoned rural areas of Hillier, Kudla, Evanston Gardens, which directly adjoin the growth investigation area of Kudla and Evanston Gardens to the west. The Town of Gawler is proposing to keep minimum allotment sizes at 10-20 acres and maintain a rural zoning. While some people do undertake rural pursuits in the area and should definitely be able to continue to do so, there is currently little high value horticulture in the area. I believe it would be a good idea to allow some smaller block sizes of 1200-2000 m2 as an option for landowners that wish to share in the amenity of the area, without the large time and capital costs of maintaining an acreage property. These pleasant zones are located in the midst of highly valued infrastructure, main roads, electrified rail, schools, shopping, sports precincts, sewer and stormwater, library, community centre, fuel stations, public bus routes and so on. It could be utilised to create a pleasant semi-rural buffer whilst also adding value to the local community. This niche was previously filled by Angle Vale Township and was highly regarded, but which no longer exists due to the expansion of development in Angle Vale. Thank you Regards, Francisco O. Grillo

Attachment 1: No file uploaded

Attachment 2: No file uploaded

Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

Sent to
proponent plansasubmissions@sa.gov.au
email:

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 11 September 2023 6:35 AM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper
Customer type: Member of the public
Given name: frank
Family name: grillo
Organisation:
Email address: [REDACTED]
Phone number: [REDACTED]
Comments: i have 2 properties in the kudla area one 5 acres one 15 acres i would like to see residential with blocks as small as allowed.
Attachment 1: No file uploaded
Attachment 2: No file uploaded
Attachment 3: No file uploaded
Attachment 4: No file uploaded
Attachment 5: No file uploaded
Sent to proponent email: plansasubmissions@sa.gov.au

DTI:PlanSA Submissions

From: Sarah Lowe [REDACTED]
Sent: Monday, 6 November 2023 4:25 PM
To: DTI:PlanSA Submissions
Cc: Anthony Pettinau; Grazio Maiorano
Subject: GARP Discussion Paper Submission - Penfield
Attachments: 230921 V1 GARP Submission.pdf

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Good afternoon,

Please find attached a submission prepared on behalf of Glynde Enterprises.

Kind regards,

Sarah



Sarah Lowe
Consultant
[REDACTED]

27 Halifax Street
Enter via Symonds PI
Adelaide SA 5000
08 8333 7999

Kaurna Country

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Monday to Friday 8.30am-5.00pm

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urps.com.au

6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Womma Road, Penfield

We act for Glynde Enterprises Pty Ltd (the Proponent) who is considering future development opportunities on its land in Penfield.

Thank you for the opportunity to comment on this Discussion Paper (Paper) which seeks to stimulate debate on how the GARP will help deliver the 300,000 additional homes and associated employment land possibly needed over the next 30 years.

Affected Area

The Proponent owns the following 3 allotments which form the Affected Area:

- 475 Womma Road, Penfield (CT5831/12).
- 481 Womma Road, Penfield (CT5831/402).
- 495 Womma Road Penfield (CT5133/463).

The land is currently within the Rural Horticulture Zone (Figure 1). It is relatively flat and has an area of 12 hectares.

The locality contains a mixture of small-scale horticultural land uses including glasshouses and outbuildings as well as residential dwellings on large allotments.

The RAAF Edinburgh base is located to the south of the land. The land is located within a strategically important area for future employment development.

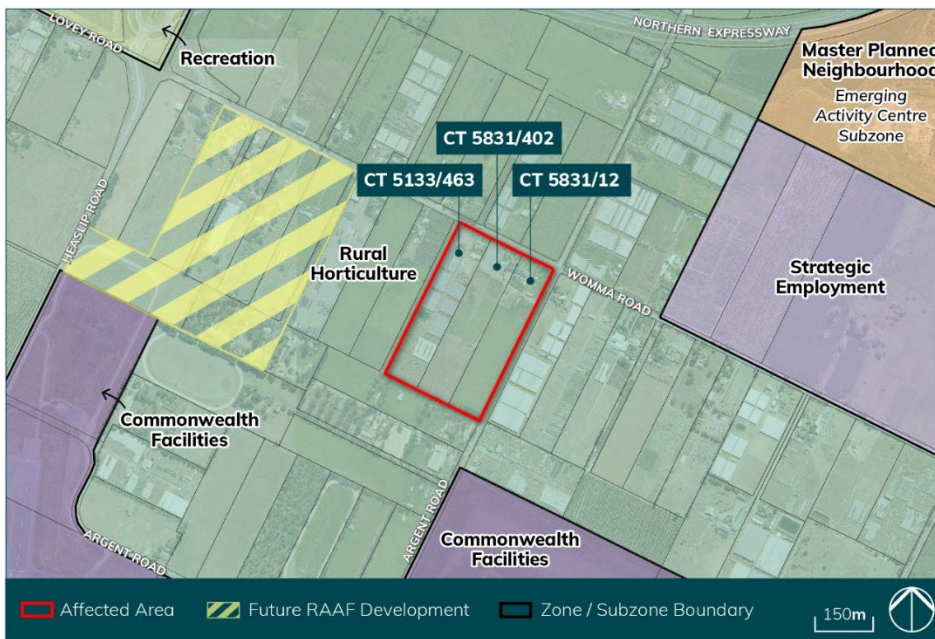


Figure 1 – The Site

Requested Action

We request that the Commission / GARP:

- Continues to identify the Affected Area as being suitable for future urban development.
- Clarifies what is meant by 'Future Employment Land' versus 'Employment Growth Investigation Area'.
- Prioritises the redevelopment of the Affected Area, as this outcome is strongly aligned with the Paper and broader strategic planning policy.

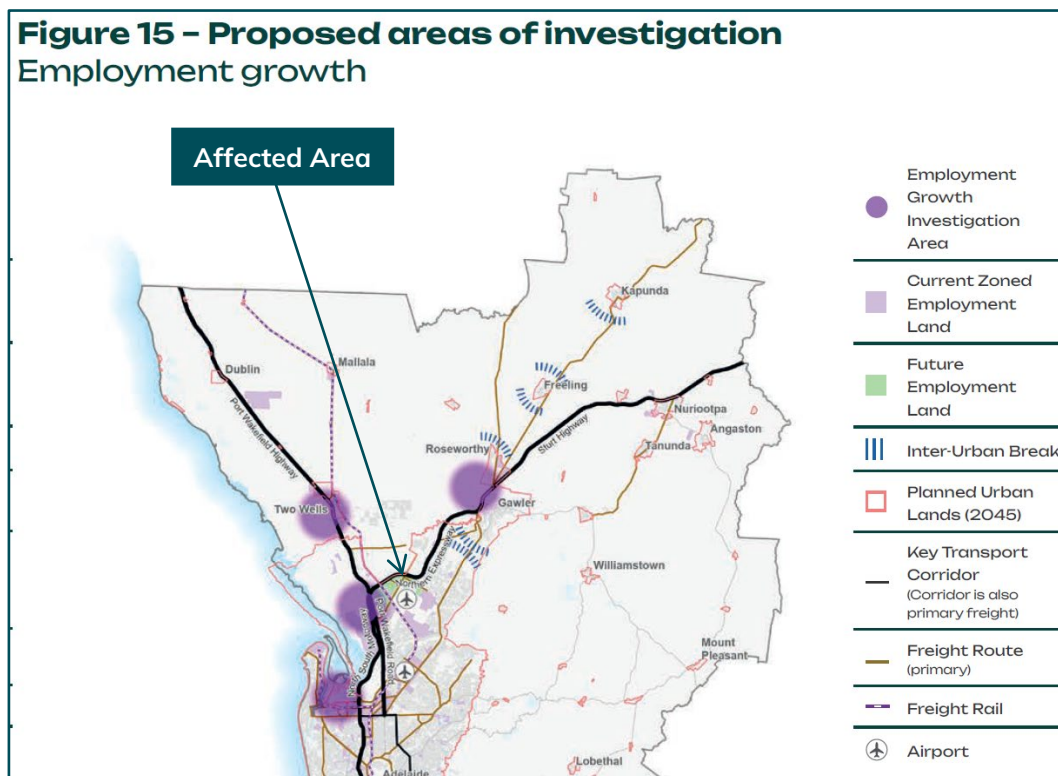
Justification

Consistency with Discussion Paper

The Paper indicate Greater Adelaide's population could grow by 670,000 people in the next 30 years, requiring targeted greenfield and infill development to provide appropriate housing and employment for these people. Easily accessible employment land is therefore crucial to support population and business growth. In other words, employment land should be provided near areas experiencing population growth.

The Paper also notes that employment land needs to be distributed to meet local demand, reduce travel times and ensure that there is a mix of land uses considered in future development. Employment land that is supported by strategic infrastructure such as major roadways should be leveraged by the planning system.

The Affected Area is identified as 'Future Employment Land' within the 'north-eastern spine' according to Figure 15 of the Paper (p 158), copied below.



This location was considered to be suitable for urban growth according to the Paper because (among other things):

- It supports significant population catchments nearby, both existing and planned (eg Davoren Park, Eyre, Andrews Farm, Munno Para and Angle Vale to the east and north).
- It capitalises on significant infrastructure investments nearby, particularly the Northern Expressway.
- It is well connected to employment activities in the Barossa Valley and northern Adelaide.
- The topography of the land is suitable for redevelopment.

The Affected Area enjoys all of the characteristics above which make it suitable for employment purposes.

It is critical that easily accessible employment land is provided to service the established residential areas to the east as well as the significant development planned in the region. Redevelopment of the Affected Area therefore supports the principles of “living locally” and delivers upon the objectives of the GARP.

General Suitability of the Land

The Proponent supports the Affected Area being identified and used for employment purposes because the land:

- Is very close to the North Expressway.
- Is flat and suitable for large industrial buildings and laydown areas.
- Is not used for highly productive primary production.
- Has previously been identified for industrial/employment zoning.

The *Playford Growth Area Structure Plan* published by DPTI in 2013 included the 'Greater Edinburgh Parks Structure Plan' (see Appendix A). This Structure Plan identifies the Affected Area as being along a major transport / freight route and within an employment / industrial area. The Structure Plan suggests providing a high quality, enterprise and employment destination in this location. It would attract a specialised workforce and provide a focus for manufacturing, research & technology, logistics & transport services, intermodal operations and enable the expansion of defence industries. This historic strategic work is therefore consistent with the Discussion Paper.

Conclusion

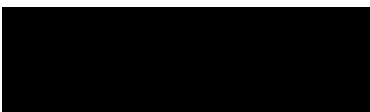
We support the intent of the Discussion Paper, which identifies the Affected Area as 'Future Employment Land' within the 'north-eastern spine'.

Further, we request that the Commission / the GARP:

- Continues to identify the Affected Area as being suitable for future urban development.
- Clarifies the meaning of 'Future Employment Land' versus 'Employment Growth Investigation Area'.
- Prioritises the future development of the Affected Area given the strategic advantages it holds, combined with the eagerness and capacity of the Proponents to redevelop the land.

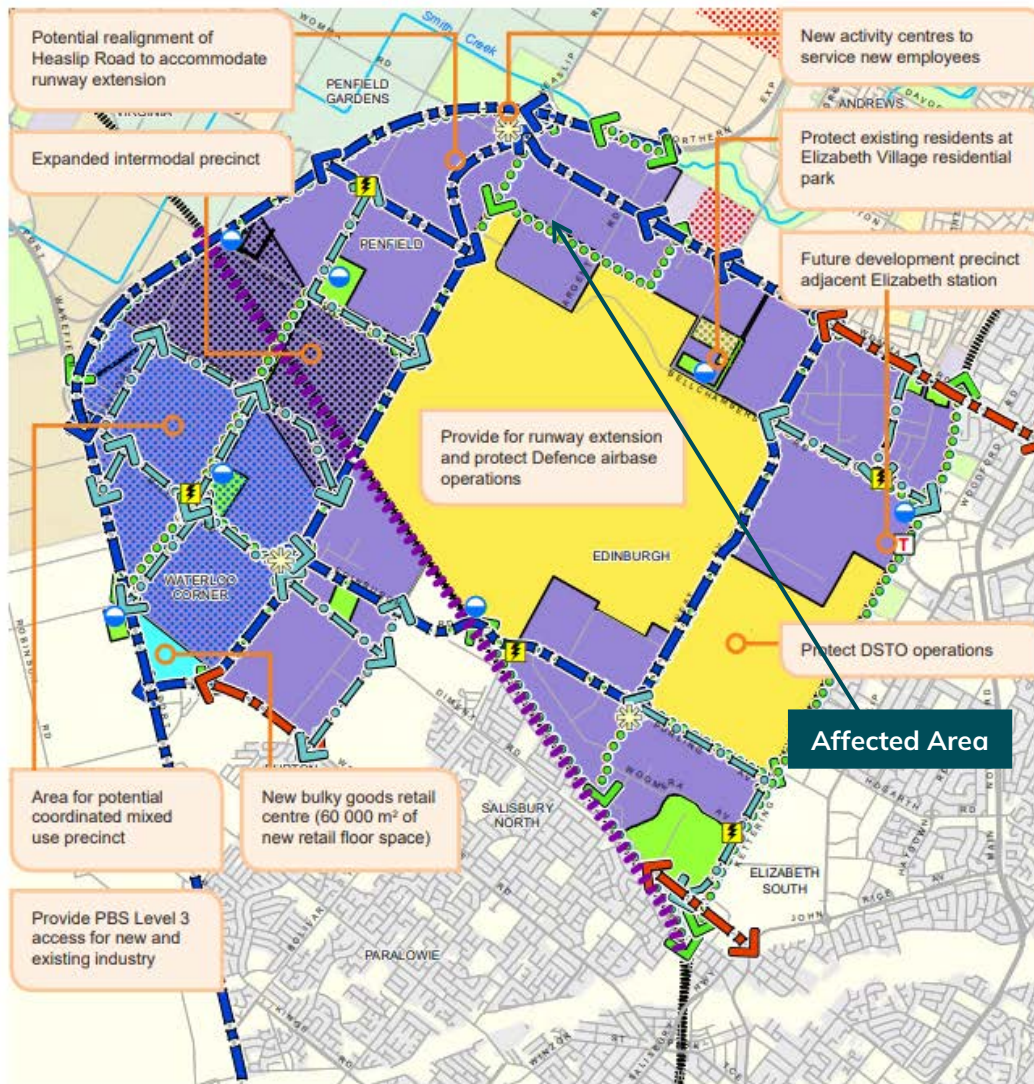
We are keen to work with the Commission, state agencies and Council to support the delivery of the Discussion Paper's employment objectives.

Yours sincerely



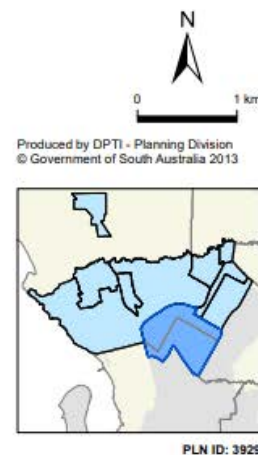
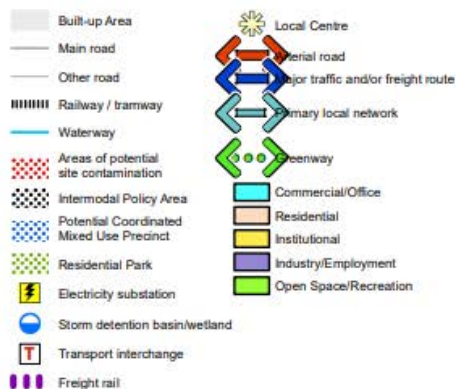
Sarah Lowe
Consultant

Appendix A - Playford Area Structure Plan (2013)



Playford Growth Area Structure Plan

Greater Edinburgh Parks Structure Plan



DTI:PlanSA Submissions

From: Zoe Garnaut [REDACTED]
Sent: Thursday, 2 November 2023 2:43 PM
To: DTI:PlanSA Submissions
Cc: Lewis Coulls; [REDACTED]
Subject: Submission on the Greater Adelaide Regional Plan Discussion Paper- Opportunity for future Urban Activity Centre Regeneration- Glynde Hotel
Attachments: 1617_002_20231102_GARP Submission_F.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir/Madam,

On behalf of our clients Glynde Hotel Pty Ltd ['the Glynde Hotel'] Ekistics are pleased to provide the attached submission which supports the proposed inclusion of land at 486 to 492 Payneham Road and 3 and 5 Alford Road, Glynde as a future Urban Corridor and Urban Activity Centre rejuvenation area in the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper').

Ekistics would welcome the opportunity to further discuss the inclusion of this landmark site within a future Urban Centre regeneration area, in particularly the opportunity to increase maximum building heights over the site to facilitate the mixed use regeneration sought within the Discussion Paper.

Kind regards,

Zoë Garnaut
Senior Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000

[REDACTED]
www.ekistics.com.au

Please note, my office hours are **Tuesdays, Wednesdays** and **Thursdays**



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

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2 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: Submission on the Greater Adelaide Regional Plan Discussion Paper – Opportunity for future Urban Corridor and Urban Activity Centre Rejuvenation – Glynde Hotel - 486 to 492 Payneham Road and 3 and 5 Alford Road, Glynde

1. EXECUTIVE SUMMARY

This submission supports the proposed inclusion of land at 486 to 492 Payneham Road and 3 and 5 Alford Road, Glynde as a future Urban Corridor and Urban Activity Centre rejuvenation area in the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper').

For the reasons expressed below, it is also our professional opinion that the site is highly conducive to accommodating additional building height via an increase the maximum building height Technical Numeric Variation (TNVs), to unlock its development potential and further enhance the 'Glynde Corner' as a vibrant mixed use precinct. Payneham Road is a key road corridor that is well serviced by public transport.

2. INTRODUCTION

We act for the Glynde Hotel Pty Ltd ['the Glynde Hotel'] who own and operate an existing two-storey hotel which was constructed in circa 1970's and is approaching the end of its useful life.

The existing hotel includes a drive through bottle shop, gaming room, sports bar, front bar and dining room with associated carparking and landscaping. Adjacent the Hotel are two (2) vacant residential allotments at 3 and 5 Alford Road Glynde that are also owned by Glynde Nominees Pty. Ltd.

The site is located within the City of Norwood, Payneham and St Peters [‘City of NPSP’] and is located on the boundary of the City of Campbelltown (eastern side of Glynburn Road and Lower North East Road). This site is located on the south-western side of ‘Glynde Corner’ an identified ‘gateway’ leading into the CBD along the north-eastern urban corridor.

Land abutting Payneham Road (between Glynburn Road and Payneham Road) has been identified within the Discussion Paper as ‘Neighbourhood and Centre Regeneration’ investigation areas. Further, the Discussion Paper also notes Payneham Road as an ‘Urban Corridor Investigation Area’.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Greater Adelaide Regional Plan and seeking stakeholder input to inform the strategic direction on how and where Greater Adelaide should grow.

This submission, prepared on behalf of the Glynde Hotel, is to provide support to identify cadastre parcels that should form part of the ‘Neighbourhood and Centre Regeneration Area’ of Glynde Corner. As set out in the submission below, the subject land is highly suitable for centre regeneration and ideally placed to cater for taller built form framing the Glynde corner to facilitate the type of vibrance centres precincts envisaged in the Discussion Paper.

3. THE SUBJECT LAND

3.1. Land Description/Identification

The ‘site’ comprises both the Hotel and the vacant residential allotments, owned by Glynde Nominees Pty. Ltd. and which comprise seven (7) allotments identified in the SA Property and Planning Atlas as listed below and illustrated in **Figure 3.1** on the following page :

1. Certificate of Title Volume 6134 Folio 971 (Allotment 74 of Filed Plan 135625);
2. Certificate of Title Volume 6134 Folio 965 (Allotment 26 of Deposited Plan 3585);
3. Certificate of Title Volume 6134 Folio 964 (Allotment 27 of Deposited Plan 3585);
4. Certificate of Title Volume 5503 Folio 864 (Allotment 28 of Deposited Plan 3585);
5. Certificate of Title Volume 5347 Folio 657 (Allotment 29 of Deposited Plan 3585);
6. Certificate of Title Volume 6134 Folio 963 (Allotment 30 of Deposited Plan 3585); and
7. Certificate of Title Volume 6134 Folio 961 (Allotment 31 of Deposited Plan 3585).

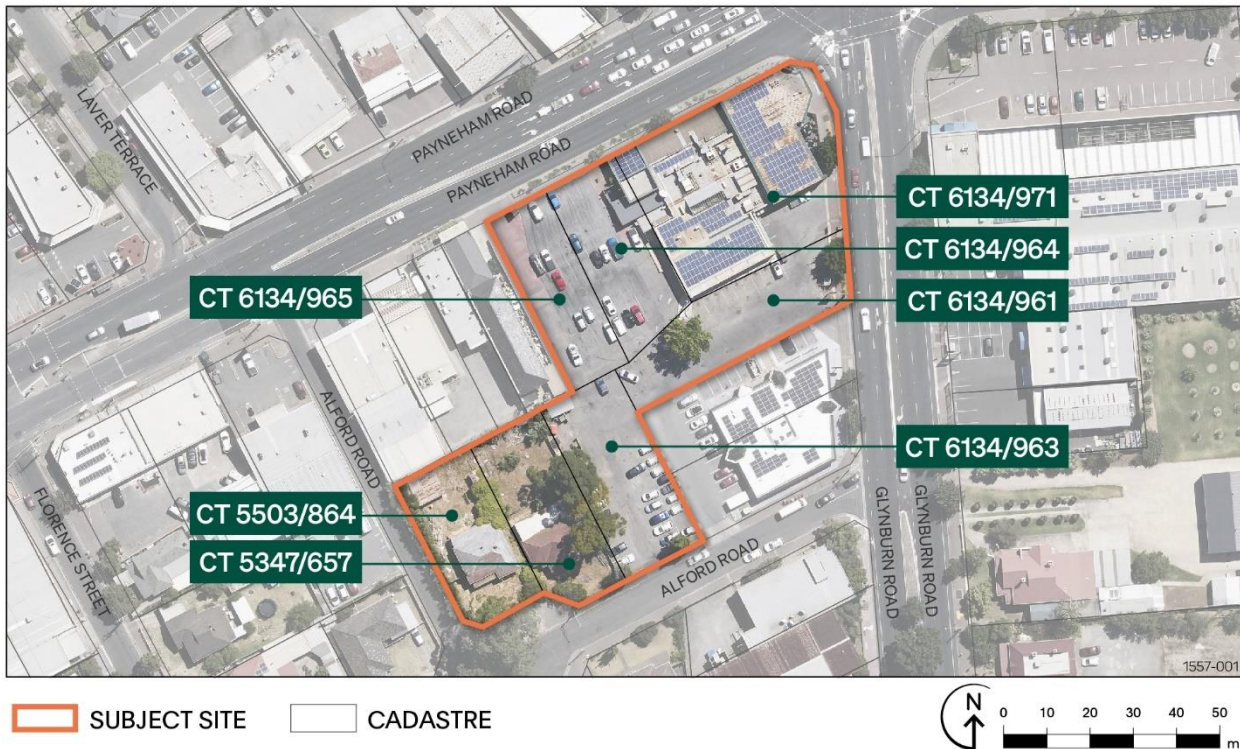


Figure 3-1 Aerial of Subject Site

The site has an approximate area of 6,410m² with a street frontage of approx. 55m to Glynburn Road, a frontage of approx. 82m to Payneham Road and a frontage of approx. 53m to Alford Road. Both Payneham Road and Glynburn Road are State Maintained Roads under the care and control of the Commissioner of Highways via DIT. Alford Road is a local road under the care and control of the City of NPSP.

As outlined above, the site currently contains the two (2) storey 'Glynde Hotel' and a single storey drive through bottle shop connected to the southern side of the hotel along with associated carparking, landscaping and refuse storage areas. Glynde Nominees Pty Ltd (the owners of the hotel) also own 3-5 Alford Road which comprise former residential allotments which are currently vacant. The site therefore represents a large, consolidated land holding on a prominent urban corridor intersection.

The existing hotel and bottle shop are approaching the end of their useful life expectancy and it is anticipated that in the short to medium term a redevelopment of the hotel is likely.

3.2. The Locality

The surrounding locality comprises predominately commercial land uses including the 'Mitre 10' Hardware store on the eastern side of Glynburn Road, cafes, restaurants, consulting / medical facilities and other complementary 'activity centre' businesses located along both Payneham and Glynburn Road frontages. The 'Glynde Plaza' shopping centre is located

approx. 110m north-west over Payneham Road (as the crow flies) is a Foodland Shopping Centre, Petrol Filling Station, McDonalds restaurant along with other speciality shops.

The 20m high granite City of Campbelltown 'Migrant Monument' is located on the north-eastern side of the 'Glynde Corner' intersection. It is a well-known local landmark and defining feature within the locality.

Built form along both Payneham Road and Glynburn Road frontages typically presents as a 'hard-edge with projecting verandahs cantilevered over the footpath or set back in the order of 2-5 metres. Parking areas are generally located to the side or rear of buildings, however there are some examples of parking forward (such as carparks forming part of the 'Glynde Plaza' shopping centre and Mitre 10). The predominate built form within the locality is single or two-storey and of varying construction typologies.

The various surrounding land uses are illustrated in **Figure 3.2** below and images of the site and the surrounding locality are provided in **Figure 3.3** on the following page.



Figure 3-2 – Land uses surrounding the site (SAPPA)



Figure 3-3 Site and Surrounds images

The subject site presents an opportunity to capitalise on its strategic location on the corner of two state maintained roads, in an existing Suburban Activity Centre Zone with Payneham Road frontage containing high-frequency bus routes ('Go Zone').

3.3. Existing Zone & Policy Framework

The subject land is currently located within the **Suburban Activity Centre Zone** (Planning and design Code- Version 2023.15 dated 26 October 2023).

Land on the opposite side of Alford Road to the south-west is located within the **Housing Diversity Neighbourhood Zone**, and the site opposite to the east along Glynburn Road is located within the **Suburban Business Zone**. The **Urban Corridor (Business) Zone** is located on the north-eastern side of the Glynde Corner and extends north on Lower North-East Road.

Figure 3.4 below identifies the current zoning that applies to the subject site and surrounding locality, illustrating a clear intent for the subject site to contribute to a vibrant and centre within the broader commercial precinct that forms 'Glynde Corner.'

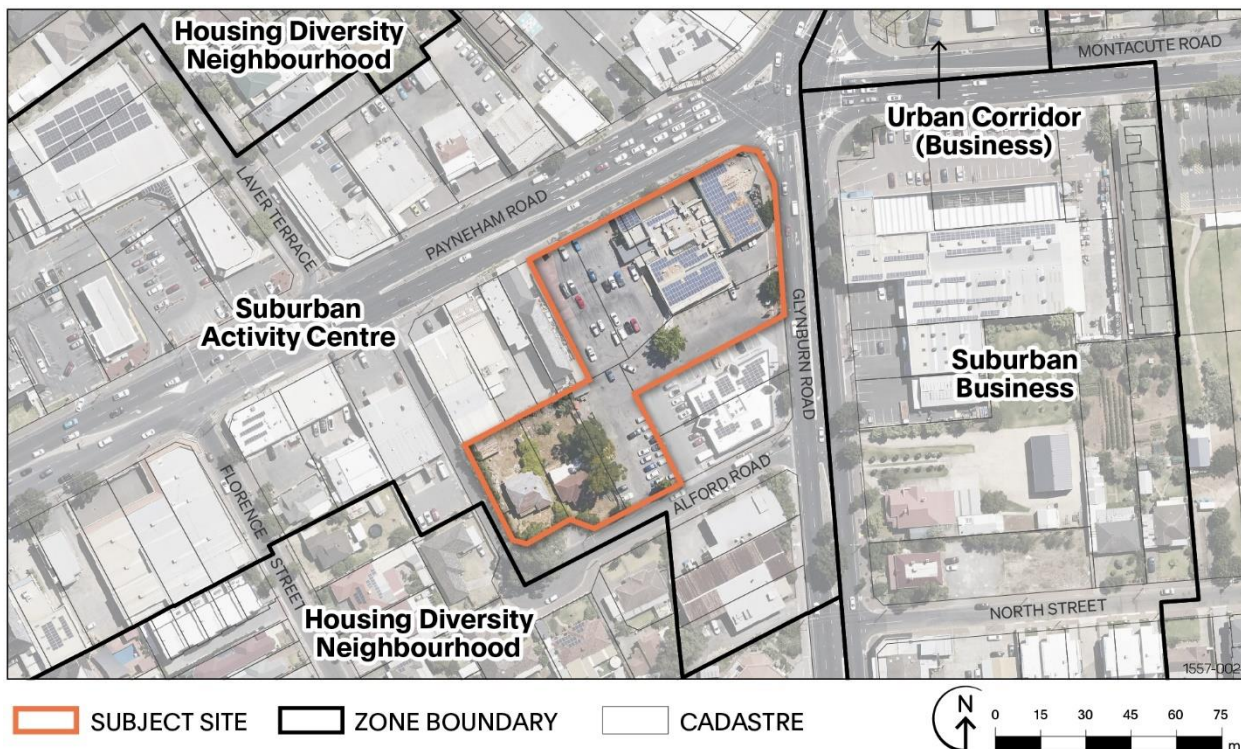


Figure 3-4 – Site and Locality Zoning Plan

The current zoning seeks:

“an active commercial precinct supporting neighbourhood-scale shopping, business, entertainment and recreation facilities to provide a focus for business and community life and most daily and weekly shopping

needs of the community. Buildings and pedestrian areas create a high quality, activated public realm that is integrated with pedestrian and cycle networks and establish well-defined connections to available public transport services,”

Whilst we support the existing zoning which applies to the site, we do however note that the existing TNV's that apply to the site limit the maximum building height to 2 building levels. This in turn significantly (and in our view, unnecessarily) inhibits the development potential of the site, including the ability to accommodate greater residential density within mixed use development.

As identified in Figure 3.5 below, the maximum building height TNVs vary greatly within the locality ranging from four (4) building levels along Lower North-East Road, dropping to two (2) building levels along much of Payneham Road, increasing to three (3) in sections and then five(5) building levels near OG Road.



Figure 3-5 Maximum Building Height (levels) TNV in locality (SAPPA)

The subject site represents an opportunity to increase the maximum building height TNV to 4-6 stories in order to achieve the desired active and vibrant commercial precinct.

3.4. 30 Year Plan for Greater Adelaide

The strategic direction contained within the '30 Year Plan for Greater Adelaide' [the '30 Year Plan'] and in particular the 'Transit corridors, growth areas and activity centres' targets of the plan seek to "support jobs and services in accessible locations and provide more housing options close to public transport. The city, mixed-use activity centres and transit corridors will be the focus of renewed activity and will be supported by rejuvenated neighbourhoods linked by integrated public transport systems and cycling networks."

Policy 5 of the 30 Year Plan seeks to "encourage medium rise development along key transport corridors, within activity centres and in urban renewal areas that support public transport use."

[our emphasis].

Part 8 of the Planning and Design Code further defines 'Medium rise' in relation to development, means 3 to 6 building levels.

4. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

According to the Greater Adelaide Regional Plan (GARP) Discussion Paper, current population projections demonstrate that by 2051 we need to plan for an additional 670,000 people in Greater Adelaide, with required housing supply of 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes beyond the existing 200,000 new homes already planned for. The Paper identifies that an additional 100,000 homes is the equivalent of 10 Concordia or Dry Creek developments and that under this growth scenario, we will run out of land for future residential development within Greater Adelaide within 30 years if an ongoing rezoning program is not developed.

The Discussion Paper has identified that future growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. Relevant to the subject site (including its development potential and its strategic alignment with the housing targets expressed within the Discussion Paper) is the desired infill to greenfield housing ratio:

"The 30-Year Plan sought to achieve a more compact urban form, with a target ratio of infill to greenfield of 70:30. This target was revised in 2017 to a more ambitious 85:15 ratio".

Whilst the Discussion Paper falls short of confirming that the existing ratio will be retained for the next iteration of the GARP, there remains a clear reliance on infill housing to accommodate the majority of Greater Adelaide's future housing needs.

The Discussion Paper also notes that urban infill can deliver significant public benefits when appropriately located and designed. Urban infill refers to "new housing constructed on vacant and underutilised allotments, interspersed amongst older, existing houses in established neighbourhoods". It has recognised economic and productivity benefits as it increases population close to higher concentrations of jobs and services, near amenities and public transport options, as well as providing a diversity of housing types, affordability and housing for different life stages near existing support networks.

4.1. Urban Corridor Opportunity

The Urban Corridor Zone was introduced to the planning system in 2013 as a key outcome of 30-Year Plan for Greater Adelaide investigations, initially along transit corridors close to the CBD, but later (in 2017) expanding to other major corridors. Urban corridor infill development typically occurs in a 'strip' formation, predominantly between main arterial roads and established low density areas, in inner and middle ring suburbs. Examples of Urban Corridor zones within the inner north-eastern suburbs include portions of Lower-North East Road in Campbelltown (immediately north of the subject site- 4 building levels), section of Payneham Road, Payneham to the west of the site (former Schweppes factory at 382 Payneham Road- 5 building levels) and various sections along both Magill Road, Norwood (6 to 10 building levels) and Magill Road, Magill (4 building levels) and The Parade in Norwood (4 to 7 building levels).

Urban corridor development presents significant opportunities for mixed use development, offering both a diversity of housing options in highly sought after established areas, along with commercial development that promote walkable, vibrant precincts. Focussing high density mixed use development along transit corridors eases the pressure on established suburban streets, preserving their distinctive residential and often historical character.

The Discussion Paper anticipates two types of corridor development, depending on the sensitivity of adjacent land uses:

1. Corridor development next to established residential land uses, particularly heritage and character areas will be of a lower scale and intensity to manage the interface with these neighbourhoods.
2. Corridor development with fewer sensitive interface issues to manage will seek to maximise the scale and intensity of buildings and uses.

Discussion Paper Figure 10 – Proposed areas of investigation: Strategic infill and corridor growth identifies the main roads within Adelaide Metropolitan Area that the Commission proposes to review, with a view to establishing the next iteration of urban corridor rezoning.

Figure 10 in the Discussion Paper (extract in **Figure 4.1** on the following page) identifies Payneham Road as one of the urban corridors highlighted for investigation.

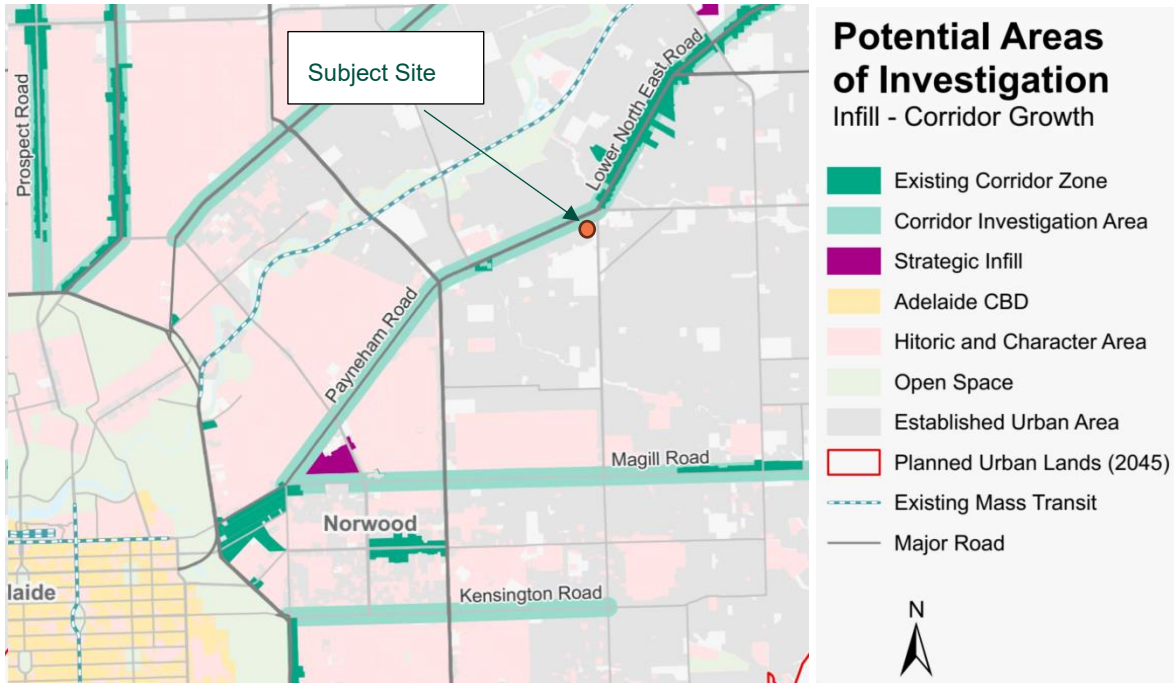


Figure 4-1 GARP Corridor Growth Investigation Areas (page 136)

Whilst our client supports the existing zoning which applies to the site (i.e. Suburban Activity Centre Zone, but excluding the building height limitation) it is also acknowledged that an Urban Corridor Zone may also be appropriate, given the similarities in land use mix and additional density and building height which may be achieved.

We note the following challenges identified in the Discussion Paper for 'urban corridor development' and the suitability of the subject land to address each of the challenges identified in **Table 4.1** on the following page:

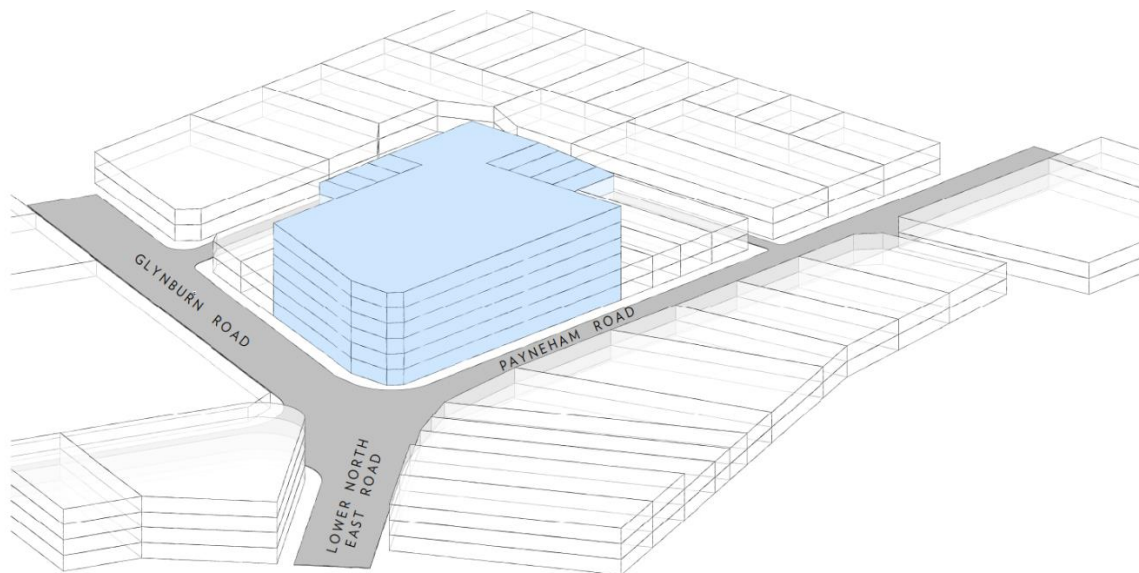
Table 4-1 Urban Corridor Investigation Analysis

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
Integration of higher density corridor developments with adjacent established housing, land division patterns and allotment depths.	<p>The land division pattern along main roads within existing Urban Corridor Zones is a consistent challenge in developing land, as the predominantly single allotment depth creates difficulties with commercial viability, and interface management with lower scale established development.</p> <p>The subject land represents an amalgamated site under single ownership with additional depth than a typical single allotment and is also separated from adjoining residential development within the Housing Diversity Neighbourhood Zone by Alford Road. It is therefore ideal for redevelopment with a greater height and density, enabling sensitive interfaces to be appropriately managed (Figure 4.2 on the following page provides an illustration of how interface in building height could be appropriately managed).</p>
Larger sites improve design outcomes, but fragmented ownership can impede site assembly.	As identified in Figure 3.1 , the owners of the subject land have a combined seven (7) allotments with a total site area of approx. of 6,410m ² . This represents a large consolidated site that is ideal to accommodate greater building height and density.
Some corridors are impacted by heritage and character overlays or are adjacent heritage and character suburbs. Any development of these corridors needs to be sensitively integrated into the surrounding urban form, and the design and interface carefully managed.	<p>The subject land and adjoining land zoned Housing Diversity Neighbourhood is <u>not</u> impeded by Local or State Heritage Places nor by an Historic Area Overlay. The closest Local Heritage Place (495 Lower North East Road, Felixstow) is located to the north of the site over Payneham Road, a six lane signalised intersection at this location. The site is therefore considered to be well separated from any heritage and additional height and density on the site is unlikely to impact the Local Heritage Place.</p> <p>Further, the north-south orientation of the site, and separation of the site by Alford Road to those properties will also assist in alleviating potential amenity impacts on adjoining low-rise development such as overshadowing.</p>
Ensuring enough local employment land to service residents	The site currently contains the Glynde Hotel which provides employment generating activities in the local area. It is envisaged a redevelopment of this site would include a mixed use of high density residential along with supportive commercial development (including the hotel use) to facilitate an active and vibrant precinct and provide employment options in close proximity to residents. Such uses

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
	<p>are generally aligned with those contemplated by the various types of Urban Corridor Zone.</p> <p>High frequency bus services operate along Payneham Road, as well as bus services on Glynburn Road and on-road bicycle lanes on both street frontages provide easy accessibility to the site.</p>
Some former industrial sites pose the risk of environmental contamination	<p>Whilst the site currently contains a hotel use with ancillary carparking and drive-through bottle shop, the balance of the site has been utilised for residential land uses. It is likely that any redevelopment would include residential at upper levels with commercial below therefore reducing the risk of any environmental contamination. Suitable investigations will be undertaken, should the land be proposed to be rezoned for a more sensitive land use at ground level than currently exist to ensure the site is suitable.</p>

Figure 4.2 on the following page illustrates a six (6) building level TNV on the subject site with associated interface building height TNV of 30 degrees at the interface with the adjoining ‘Housing Diversity Neighbourhood Zone.’ The figure illustrates that existing maximum building height TNV envelopes elsewhere in the locality ranging from two building levels to four building levels. The massing diagram illustrates that a building height of 6 building levels over the subject site would be a natural transition in height from adjoining TNVs recognising the corner as a prominent ‘gateway’ within the activity centre.

For the reasons expressed above, our client supports the designation of land abutting Payneham Road (inclusive of all land owned by Glynde Nominees Pty. Ltd.) as an Urban Corridor investigation area. In particular, an Urban Corridor Zone that would maintain the flexibility in land use mix (currently enjoyed with the existing zoning) whilst also accommodating additional building height of up to 6 storeys along Payneham Road.



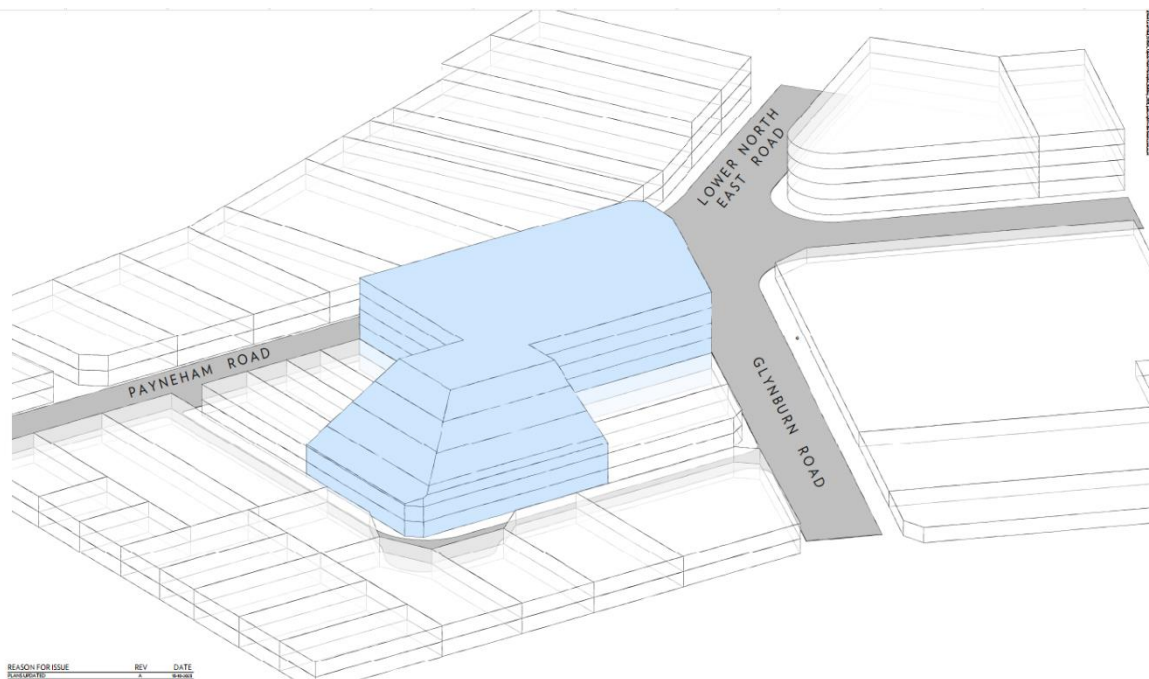
REASON FOR ISSUE	REV	DATE
REVISION	1	10/10/2021
REVISION	2	10/10/2021

PRELIMINARY

WALTER BROOKE ARCHITECTURE
INTERIOR DESIGN
LANDSCAPE ARCHITECTURE
MASTER PLANNING

GLYNDE HOTEL MASTERPLAN
GLYNBURN ROAD & PAYNEHAM ROAD

DEVELOPMENT HASSING VIEW 1	DRAWING	REV
10/10/2021	REVISION	1
10/10/2021	PROJECT	10/10/2021



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DEVELOPMENT HASSING VIEW 1	DRAWING	REV
10/10/2021	REVISION	1
10/10/2021	PROJECT	10/10/2021

Figure 4-2 – Building Diagram Example – 6 building level with 30 degree interface setback

4.2. Neighbourhood and Centre Regeneration Opportunity

The Discussion Paper outlines that Urban Activity Centres “generally provide a full range of services like shopping, entertainment, health, community and recreation. This provides an opportunity to further develop higher-density housing that will capitalise on the proximity to these services and support their economic viability.”

The Discussion Paper identifies that some of the benefits of regenerating urban activity centres include utilising the significant infrastructure investment already in place including public transport, education, medical facilities, and variety of shops and services. The Paper identifies that land uses in and around some centres could be better zoned to provide a range of housing options near these services and facilities.

Situated within the Suburban Activity Centre, the subject site has been identified within Figure 11 (also illustrated in **Figure 4.3** below) of the Discussion Paper as being within (or on the fringe of) a Neighbourhood and Centre Regeneration area.

Importantly, the Discussion Paper notes that “due to their scale and population catchment” Urban Activity Centres provide “an opportunity to further develop higher-density housing that will capitalise on the proximity to these services and support their economic viability”.

As a consolidated site, under single owner and bounded by two arterial roads and one local road, the subject site provides an outstanding opportunity to accommodate additional building height and urban uplift to support the long-term viability of the existing Activity Centre, as per the intent of the Discussion Paper. Conversely, the existing restrictions on building for this landmark site severely compromises the financial viability of site redevelopment ventures and is contrary to the objectives set out within the Discussion Paper.

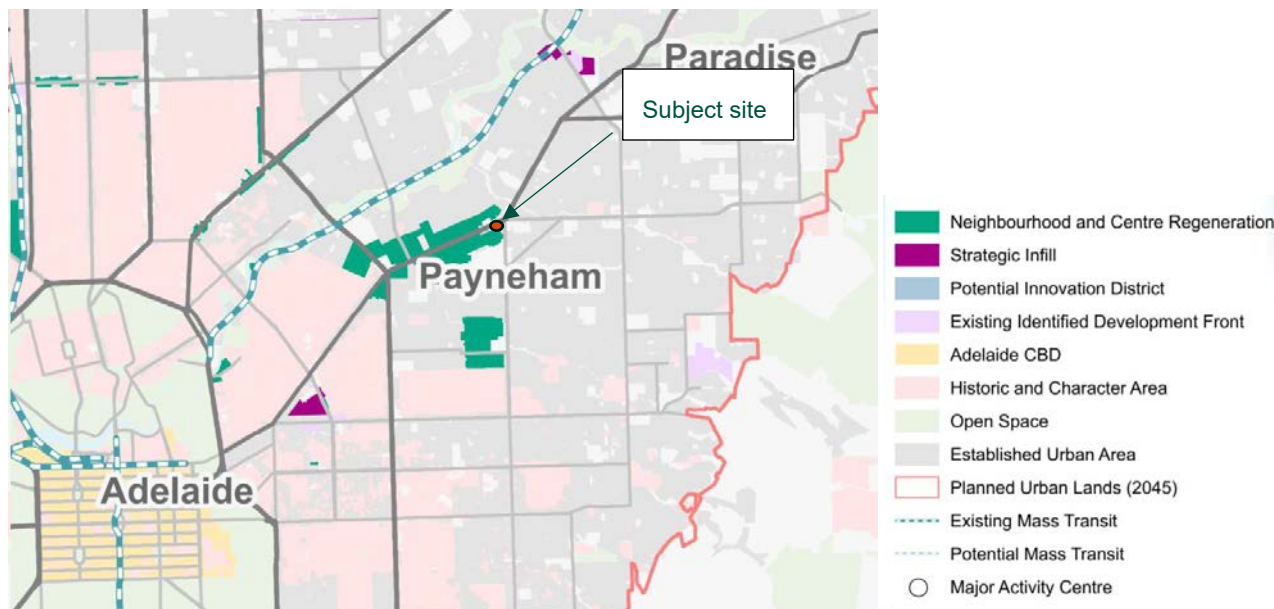


Figure 4-3 GARP Neighbourhood and Centre Regeneration Investigation Area (page 141)

Table 4.2 on the following page provides an analysis of the challenges identified in the Discussion Paper for 'Centre Regeneration' and the suitability of the subject land to address each of the challenges identified.

Table 4-2 – Urban Activity Centre Regeneration Analysis

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
A renewed focus on areas in and around urban centres will need better implementation and coordination measures and consideration of current infrastructure capacity	The site is currently well serviced by public transport on both the Payneham and Glynburn street frontages. The site is also serviced by electricity, water, sewer, gas and telecommunication services. Whilst these may require slight augmentation to facilitate redevelopment over the site, initial analysis is there is sufficient capacity within these networks to accommodate higher density development.
Sensitive integration with adjacent established housing is essential	<p>As identified in Figure 4.2 above, the closest established housing located within the Housing Diversity Neighbourhood Zone is located on the south-western side of Alford Road. This lends the subject site to facilitating a gradual transition in height from Alford Road to Payneham Road to the north and Glynburn Road to the east. The road separation also provides a clear transition area from low-rise built form to medium rise (3-6 storey) built form.</p> <p>Interface considerations particularly in relation to visual appearance of built form and overshadowing are therefore able to be appropriately managed due to the large, consolidated nature of the site and the separation distances from adjoining residences.</p>
Larger sites improve design outcomes, but fragmented ownership is a challenge to site assembly.	<p>As outlined above, the subject site represents a large consolidated land holding within a key gateway location. It is within walking distance (approx. 150m) from the Glynde Plaza shopping centre to the west, and approx. 550m south of the ‘The ARC Campbelltown’ aquatic and recreation centre.’</p> <p>The regeneration of this strategically important land holding on the Glynde Corner through increased density and building height would act as a catalyst to enhance the area into an active and vibrant precinct.</p>

5. REDEVELOPMENT SUITABILITY

Based on initial investigations (and subject to further future detailed analysis), we anticipate the site can accommodate medium rise (3 to 6 building levels), medium net residential density (35 – 70 dw/ha) with retention of ground level hotel/entertainment and retail / commercial uses to facilitate mixed use infill development that address both Payneham and Glynburn Road street frontages. Such an outcome would be aligned with the existing land use mix contemplated for the

Suburban Activity Centre Zone, subject to building height TNV's being modified (increased) to support the density outcomes expressed within PO 1.4 of the zone:

PO 1.4: Where residential development is appropriate having regard to other performance outcomes of the zone, residential development achieves medium to high densities.

A similar outcome could also be achieved via the application of an Urban Corridor Zone, with building height TNV's of between 3 and 6 storeys along Alford Road and Payneham Road, respectively.

Consideration of the interface with the adjoining residential development (likely to remain in the 'Housing Diversity Neighbourhood Zone') will be an important part of the future development application process for redevelopment of the site. We would anticipate a lower building height at the south-western interface of the site along Alford Road.

Redevelopment of the site will need to carefully consider factors such as the future road widening requirements of the Glynde Corner (Payneham Road/Glynburn Road) intersection, vehicle access points to minimise disruption to the free flow of traffic on the State Maintained Roads and the contextual location of the built form in relation to adjoining sensitive residential land uses within the adjoining Housing Diversity Neighbourhood Zone.

Based on an initial assessment of the site, we are of the opinion that the site, and the Payneham Road corridor identified in the Discussion Paper, is well placed to accommodate additional building height and greater densities taking into account the following factors:

- Transport – As mentioned, the Payneham Road corridor and subject site is well located to accommodate urban infill, being located on a high frequency "Go Zone" public bus route on (bus services every 15 minutes between 7.30am to 6.30pm Monday to Friday);
- Topography – The land is relatively flat and should not topographically constrain future development options;
- Flooding – Only limited portions of the Payneham Road/Glynburn Road corridor are affected by the current Hazards (Flooding) Overlays, primarily in the vicinity of the north-eastern corner of the site and overland flow path to Fourth Creek (which runs approx. 280m north of the site on Lower North East Road). Any areas of potential flooding or overland flow could be suitably mitigated through an engineered response in a future development of the site including possible detention; and
- Interface Considerations– As mentioned, the site is well separated from adjoining residential land uses located within a 'neighbourhood type zone' and could provide a suitable transition in building height across the large consolidated site.

The subject land is under the control of Glynde Nominees Pty Ltd, who strongly support:

- The identification of the subject land as a designated urban corridor investigation area capable of accommodating a diverse mix of commercial and residential uses at medium densities; or
- The retention of the existing Suburban Activity Centre zone with modified TNV's to support urban uplift, including medium density development outcomes; and

- The increase in maximum building height TNV over the site (ideally to 6 building levels) in order to facilitate mixed use development and an uplift in building height and density.

The landowners have commenced early investigations into the potential to redevelopment of the subject site, and have initiated discussions with the City of Norwood, Payneham St Peters and Department for Infrastructure and Transport in relation to a future development application.

The subject site therefore has a strong propensity for future development where existing restrictions on building height and density are addressed.

6. CONCLUSION

This submission is provided to assist the State Planning Commission's upcoming review of the Greater Adelaide Regional Plan, in response to the Discussion Paper issued by the State Planning Commission.

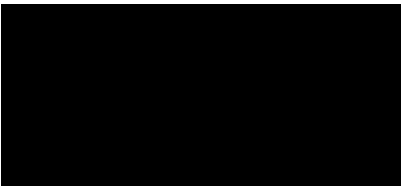
We are of the opinion that the Glynde Corner and more specifically the Payneham Road frontage, incorporating the subject land, provides a logical opportunity for urban activity centre regeneration along a strategic transport corridor as identified in the Greater Adelaide Regional Plan Discussion Paper.

Based on preliminary analysis the subject site does not present significant constraints that would prevent future urban development and the land is not fragmented and is under the control of a single entity to enable a coordinated approach and delivery of a future mixed use development.

Glynde Nominees Pty Ltd therefore supports the concept of Urban Activity Centre regeneration noted within the Discussion Paper. To achieve this desired outcome, it is requested that the existing restrictions on building height are modified, to support opportunities for urban corridor growth along Payneham Road, including medium density development outcomes which are aligned with the Commissions infill housing targets in the short to medium term (0-15 years).

Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

Yours sincerely,



Zoë Garnaut

Senior Associate

CC: Glynde Nominees Pty Ltd

[REDACTED]

DTI:PlanSA Submissions

From: Rob Gagetti [REDACTED]
Sent: Tuesday, 31 October 2023 10:25 AM
To: DTI:PlanSA Submissions
Cc: Tharushi De Fonseka; [REDACTED] Danny Nemer
Subject: GARP Discussion Paper Submission - Lot 782 and 790 Main South Road, Aldinga Beach
Attachments: 01607_002_20231005_GARP Submission_(Final) .pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir/Madam,

We act for GPL (No. 3) Pty Ltd – which is the owner of land located at Lot 782 and 790 Main South Road, Aldinga.

In relation to this land, please find attached a submission prepared in response to the Greater Adelaide Regional Plan Discussion Paper.

Please do not hesitate to contact the undersigned should you require any further clarification concerning the matters raised in the attached submission.

Kind regards,

Rob Gagetti
Senior Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000

[REDACTED]
www.ekistics.com.au

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

Disclaimer: The information in this email is and any attached file is confidential and may be legally privileged. Unauthorised access, use of reproduction in any form by any person other than the intended recipient is prohibited. If you have received this email or its attachments in error, please notify the sender immediately and delete it from your inbox and deleted items folder. We do not warrant that this email or any files transmitted with it are free of viruses or any other electronic defect.

31 October 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: *Growth Management Team*
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER – FUTURE URBAN GROWTH OPPORTUNITY AT LOT 782 & LOT 790 MAIN SOUTH ROAD, ALDINGA BEACH.

We act for G.P.L (No.3) Pty. Ltd. who owns and controls land located at Lots 782 and 790 Main South Road, Aldinga Beach (the subject 'Site').

This submission has been prepared in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper and seeks the State Planning Commission's (SPC) consideration of the 'Site' as a potential future urban growth area.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper and for seeking stakeholder and community input to inform the preparation of the next Regional Plan for Greater Adelaide.

For the reasons discussed below, it is our opinion that the Site could form a logical and orderly extension of Greater Adelaide and be identified as future 'Planned Urban Lands (2045)', capitalising on current and planned infrastructure projects, including the Main South Road duplication and the Seaford railway line extension to Aldinga.

1. SITE AND LOCALITY OVERVIEW

1.1. Land Description / Identification

Located at Lots 782 and 790 Main South Road in Aldinga Beach, the site comprises three (3) land parcels which are formally identified in the following Certificates of Title:

Certificate of Title Volume 5756 Folio 121, Allotment 782 in Filed Plan 6460;

Certificate of Title Volume 5756 Folio 120, Allotment 790 in Filed Plan 164613; and

Certificate of Title Volume 5580 Folio 274, Section 430 in Hundred 106000.

The site is illustrated in **Figure 1-1** below:

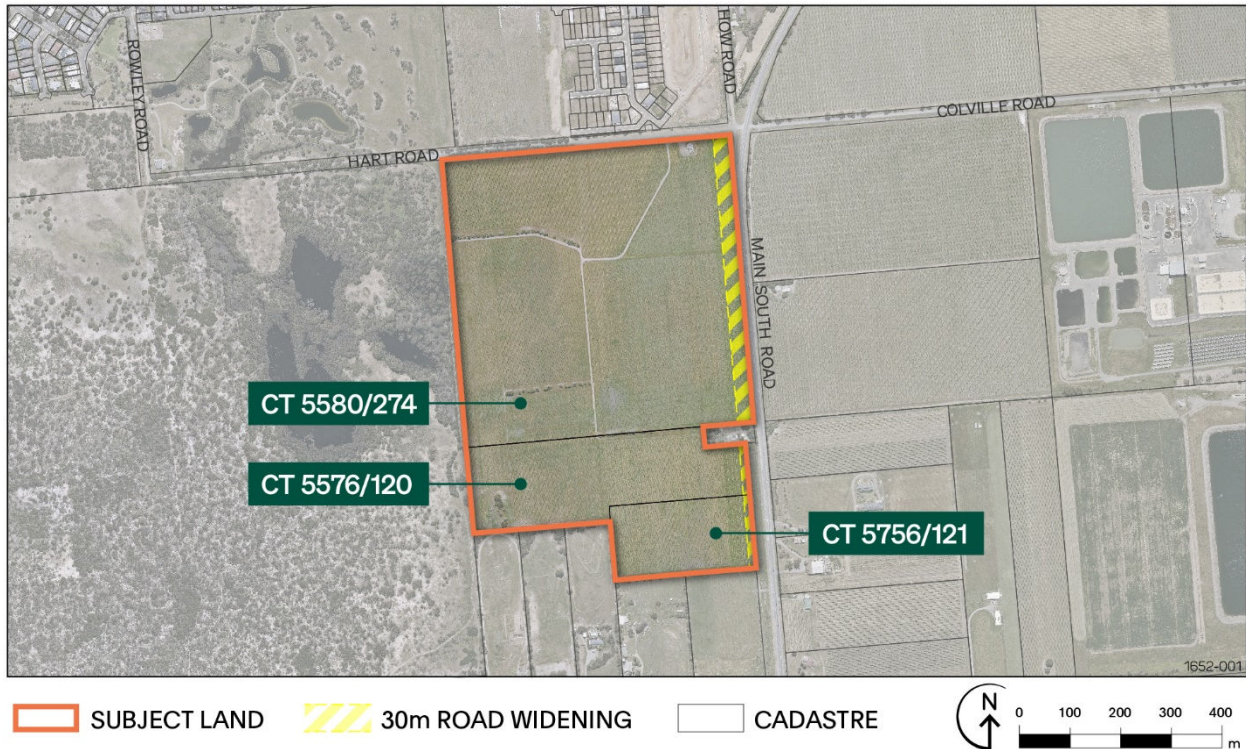


Figure 1-1 - Site Image

The site comprises a total area of 45.89 hectares, is relatively flat (with no discernible gradient), and is predominantly used for viticulture (a form of horticulture). A rainwater tank (likely for water harvesting and irrigation purposes) is positioned at the northern end of the site (adjacent Hart Road) and vehicle access tracks traverse the land in a grid-like manner, providing access to the vineyards for maintenance purposes.

The site is bounded by Hart Road to the north and Main South Road to the east. Hart Road is a local road under the care and control of the City of Onkaparinga whilst Main South Road is a State Maintained Road which is under the care and control of the Commissioner of Highways. The South Australian Property and Planning Atlas (SAPPA) also identifies Main South Road as a 'Major Urban Transport Route'.

We note that the site is subject to road widening and is soon-to-be affected by the Main South Road duplication project (Stage 2). The land owner has advised that the Commission of Highways intends to compulsory acquire in the order of 30 metres of the site's frontage to Main South Road for road widening, together with a small section of the Site's Hart Road frontage to accommodate intersection upgrades. Approximately 3 hectares of productive land will be removed from the site, as illustrated in **Figure 1-1**. The location of the site relative the broader extent of Stage 2 works (between Port Road and Norman Road) is illustrated below:

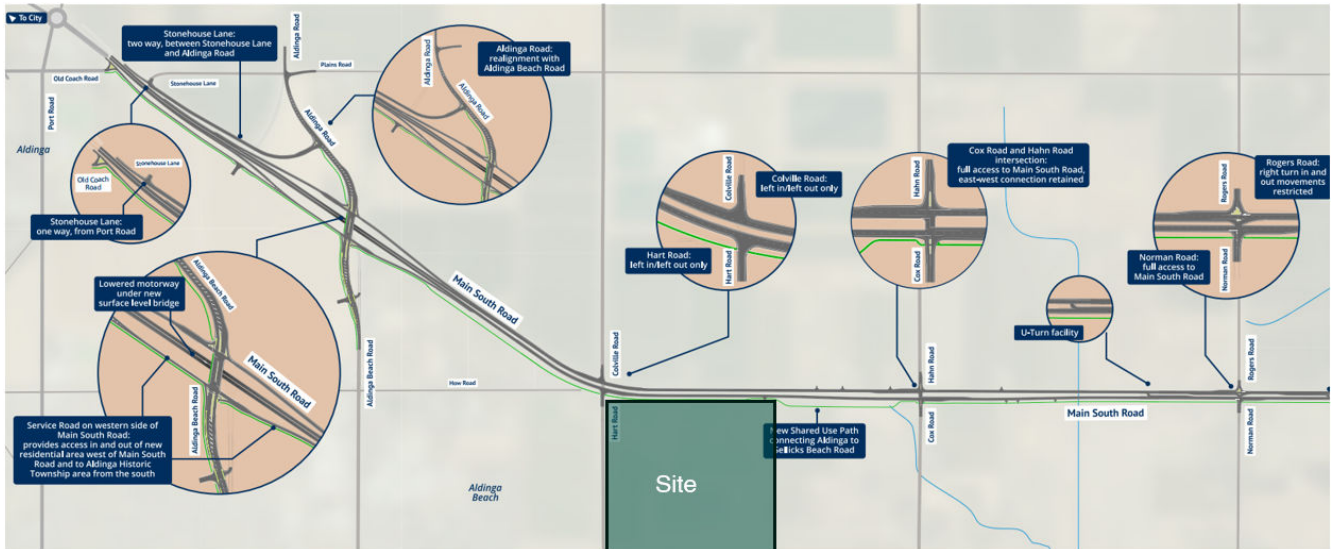


Figure 1-2 - Main South Road Duplication Project (Stage 2) – Source: www.dit.sa.gov.au

1.2. The Locality

Figure 1-3 identifies the subject site relative to the broader locality, including key land uses evident within the locality.

Aldinga Conservation Park (which includes Aldinga Scrub) adjoins the site to the west and is situated within the 'Conservation Zone'. Importantly, the 'State Significant Native Vegetation Overlay' also applies to this adjoining land and extends into all adjoining land (including the subject site) by approximately 50 metres (to ensure an appropriate buffer is maintained between adjoining land uses and development and native vegetation). Further west (beyond Aldinga Conservation Park) is low density residential development which primarily takes the form of low rise detached dwellings, situated within the 'Rural Neighbourhood Zone'.

Excluding the Hart Road Wetland and a limited amount of land retained for primary production, land to the north and north-west of the site primarily accommodates residential development which predominantly takes the form of low-rise low density detached dwellings. Directly to the north of the site (on the opposite side of Hart Road) is the Aldinga Green residential estate, which is currently under development, and which is situated within the 'Master Planned Township Zone'.

Land to the south of the site (western side of Main South Road) predominantly accommodates single storey detached dwellings set on large rural allotments that are situated within the 'Rural Zone'. Some land is used for primary production purposes. Notwithstanding, west of Main South Road, primary production is not the predominant use of land.

Importantly, all land situated on the eastern side of Main South Road is located within the 'Rural Zone', with primary production being the predominant land use in this location. The 'SA Water Aldinga Wastewater Treatment Plant' is also located approximately 650 metres to the east of the Site. Further east of this facility (and approximately 1.75km from the site) is the Aldinga Airfield.

Relevant to this submission is the clear disparity in land uses to the east and west of the Main South Road. Whereas primary production is the predominant land use which occupies land to the east of Main South Road, the western side of

Main South Road is characterised by the undevelopable Aldinga Scrub, rural-residential land holdings and a limited amount of primary production.

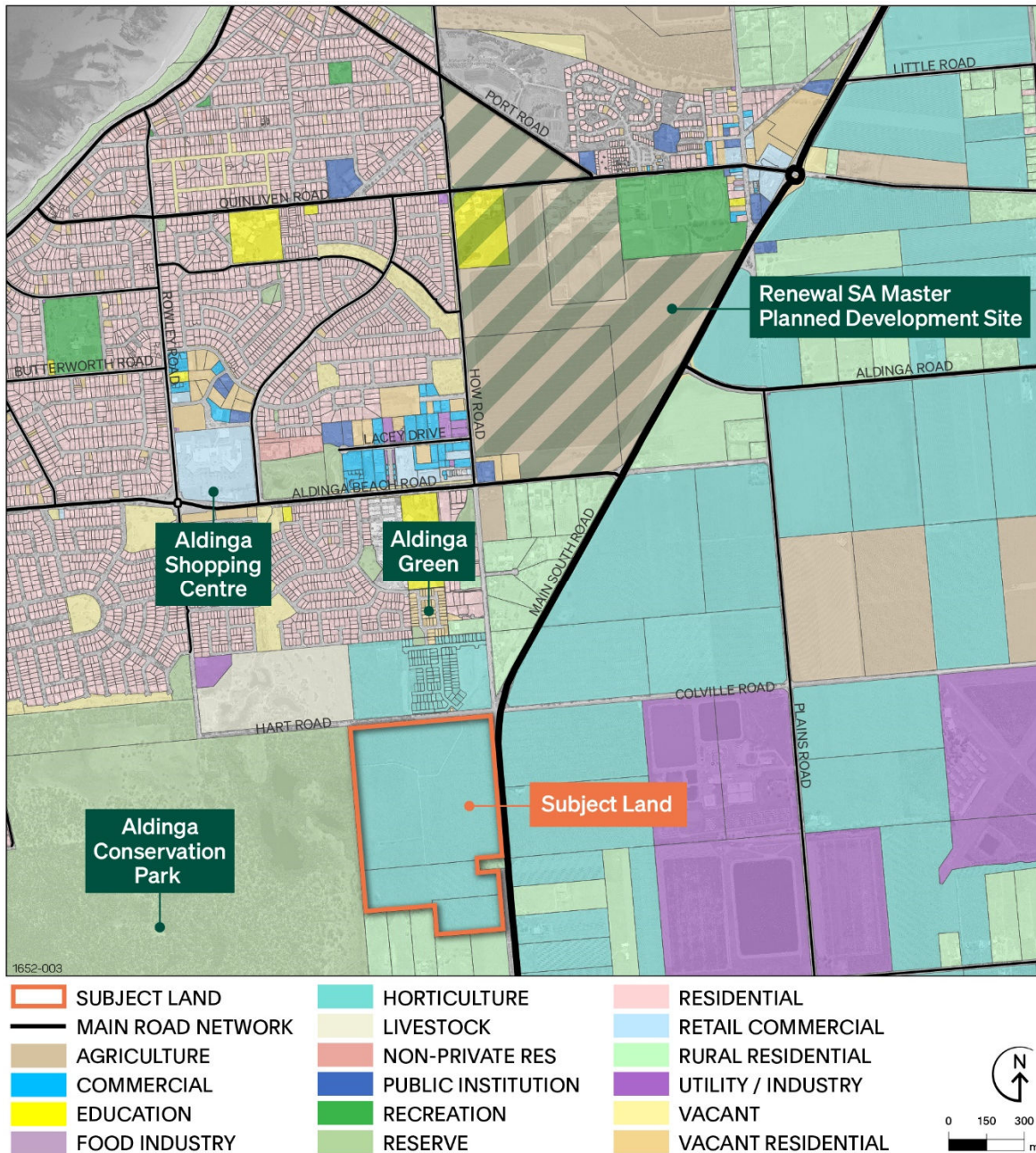


Figure 1-3 – Locality

1.2.1. Renewal SA Development & Rail Corridor Extension

Approximately 1km north of the site (as the 'crow flies') is the Renewal SA Master Planned development site, which comprises approximately 60 hectares of land, with a 6.6 hectare area of land that is 60 metres wide set aside for a future rail corridor extension and park 'n' ride / bus interchange (**Figure 1-4**).

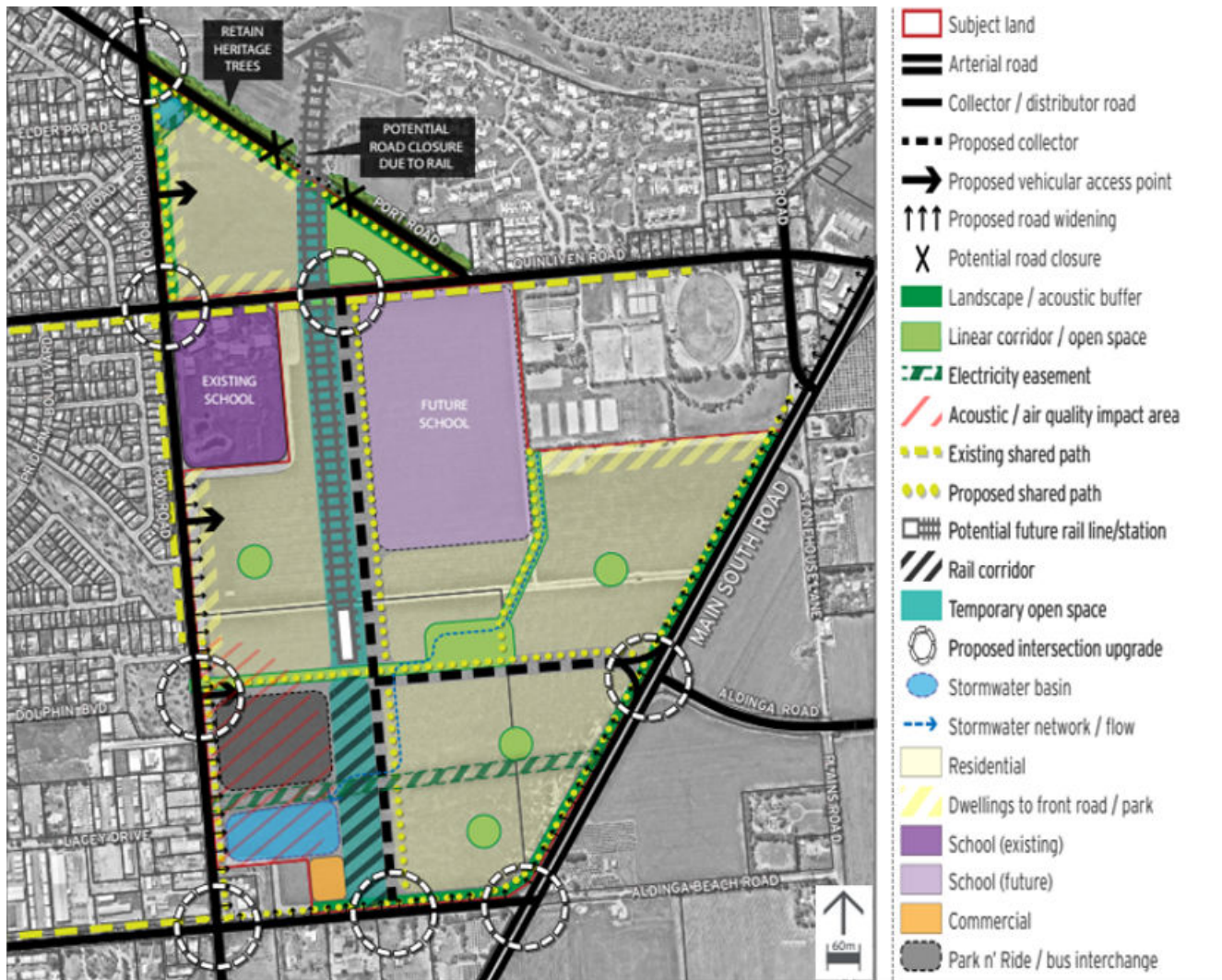


Figure 1-4 – RSA Draft Structure Plan. Source: *RSA Community Engagement Report, 2020 Update*

We note that the original Expression of Interest Document (EOI) document released by Renewal SA was revised/updated to include the rail corridor, which is to extend southward through the land, before terminating at the southern boundary, adjacent Aldinga Beach Road.

On its website, the Department for Infrastructure and Transport (DIT) note the following with respect to the future infrastructure works:

“The South Australian Government has preserved a rail corridor of land at Aldinga for a future extension of the Seaford rail line to Aldinga. The 60 metre wide corridor from Quinliven Road to Aldinga Beach Road provides long-term options for growing southern suburb.” (our emphasis)

and

“There are no immediate plans to extend the Seaford rail line to Aldinga. The corridor of land within the subject site at Aldinga will allow for future extension to be pursued in the 2030’s.” (www.dit.sa.gov.au)

The preservation of land for a future rail corridor is reflective of the State Government’s commitment to investing in public transport infrastructure to support medium-to-long term future urban growth within the outer south.

2. EXISTING ZONE AND POLICY FRAMEWORK

Zoning for site and land within the immediate locality is illustrated in **Figure 2-1** below.

As discussed above, the site is located within the ‘Rural Zone’, which seeks the following Desired Outcomes:

- DO 1:** *A zone supporting the economic prosperity of South Australia primarily through the production, processing, storage and distribution of primary produce, forestry and the generation of energy from renewable sources.*
- DO 2:** *A zone supporting diversification of existing businesses that promote value-adding such as industry, storage and warehousing activities, the sale and consumption of primary produce, tourist development and accommodation.*

In addition, the following Overlays apply to the Site:

- Airport Building Heights (Aircraft Landing Area)
- Building Near Airfields
- Character Preservation District (Not in Township)
- Future Road Widening
- Hazards (Bushfire – General)
- Hazards (Bushfire – Medium Risk)
- Hazards (Flooding – Evidence Required)
- Major Urban Transport Routes
- Native Vegetation
- Prescribed Water Resources Area
- Prescribed Wells Area
- Regulated and Significant Tree
- State Significant Native Vegetation
- Scenic Quality
- Traffic Generating Development
- Water Resources

No Technical Numerical Variations (TNV’s) apply to the Site.

Figure 2-1 illustrates that land to the south and east is also located within the ‘Rural Zone’, whilst land to west (encompassing Aldinga Scrub) is located within the ‘Conservation Zone’ and land to the north is located within the ‘Master Planned Township Zone’.

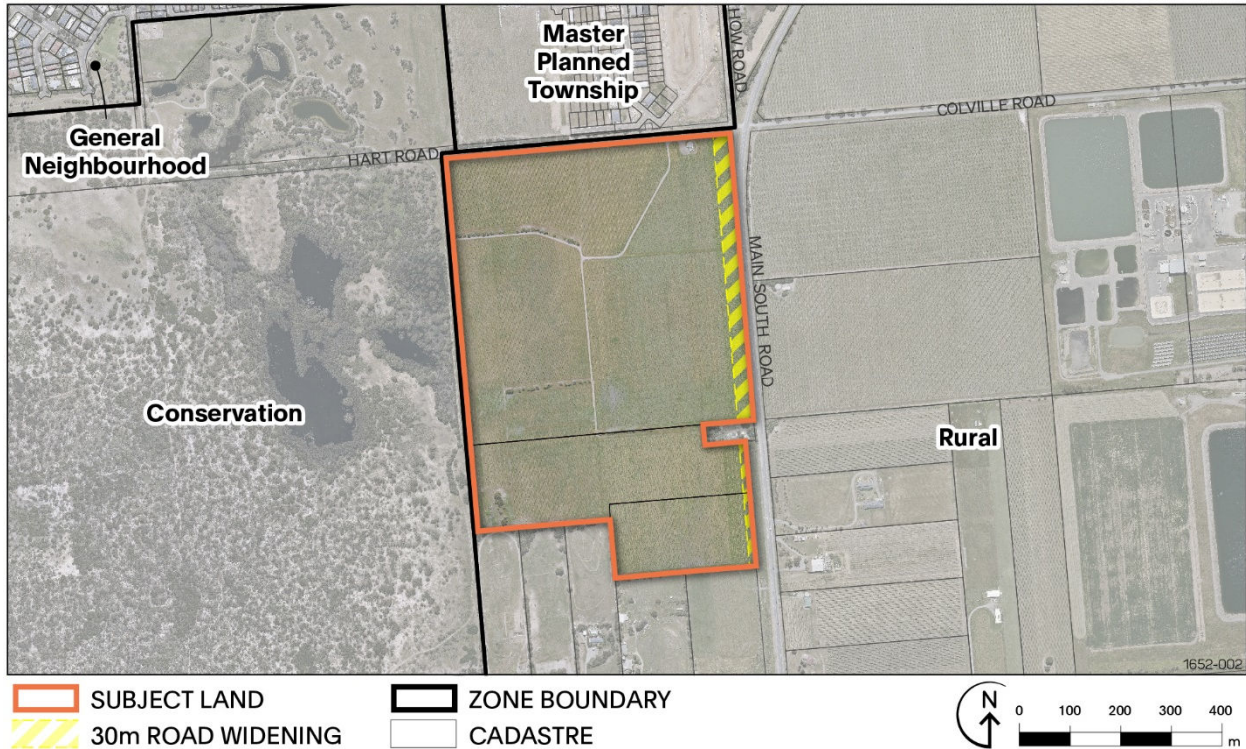


Figure 2-1 - Zoning Map

2.1. Existing Legislative & Policy Constraints

As stated above, the 'Character Preservation District' (not in township) Overlay' also applies to the site and the site is subject to the provisions set out within the *Character Preservation (McLaren Vale) Act 2012* (the 'Act'). Section 6 outlines the objects of the Act and Character Preservation District (CPD):

The objects of this Act are –

- (a) to recognise, protect and enhance the special character of the district while at the same time providing for the economic, social and physical well being of the community; and*
- (b) to ensure that activities that are unacceptable in view of their adverse effects on the special character of the district are prevented from proceeding; and*
- (c) to ensure that future development does not detract from the special character of the district; and*
- (d) otherwise to ensure the preservation of the special character of the district.*

Section 8(5) of this Act is particularly relevant the intention to develop the site for residential purposes:

“If a proposed development to which this section applies will create additional allotments to be used for residential development, the relevant authority must refuse to grant development authorisation in relation to the proposed development (if the application for the development authorisation for the division of land was made after the commencement of this section).”

Additionally, Section 7(4) of the *Planning Development and Infrastructure Act 2016* (the PDI Act) clarifies the relationship between the CPD and Environment and Food Protection Areas (EFPA's):

“If an area of land that is, or is included in, a character preservation area under a character preservation law ceases to be, or to be included in, a character preservation area, the area of land will, at the time of the cessation, by force of this subsection, be taken to be an environment and food production area established under this section.”

Introduced in December 2017, 'Environment and Food Production Areas' (EFPA's) were established to protect valuable rural, landscape, environmental and food production areas surrounding Metropolitan Adelaide from urban encroachment. Land division for residential purposes is prevented within the EFPA.

In 2018 the Commission conducted a review of the CPD boundaries and in doing so, recommended further investigation into the merits of amending the CPD for eight identified locations, in the context of Greater Adelaide's growth. This review was subsequently bundled together with the inaugural review of the EFPA which occurred in 2021. Following this review, the Commission declined to revise the boundaries of the CPD and EFPA (other than to address minor boundary anomalies), having formed the view that sufficient land remained available to support housing and employment growth for a projected 15-year timeframe.

Critically, the EFPA Outcomes Report acknowledges that the investigations conducted by the Commission did not consider land supply at the sub-regional level or specific forms of residential land supply (i.e. greenfield, township or urban infill).

That is, the assessment did not consider the distribution of population growth and the availability of land to service growth at a sub-regional level.

3. GARP DISCUSSION PAPER

3.1. Key Policy Directions

The Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper') indicates a projected growth in population within Greater Adelaide of 670,000 by 2051. This represents a 47% increase in Greater Adelaide's current population.

The Discussion Paper also forecasts the need to supply 300,000 new homes to meet this projected population increase and identifies that there is a current capacity for an additional 200,000 homes (164,000 homes in land already zoned for residential development and a further 47,000 homes that could be accommodated on land already identified for future residential rezoning). The Discussion Paper identifies the need to therefore supply an additional 100,000 homes by 2051 or

based on current estimates under a high growth scenario - we will run out of land for future residential development within 30 years unless an ongoing rezoning program is established.

In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success, and there is a clear desire to concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure such as roads, schools, healthcare, water, and public transport services. A key strategy outlined within the Discussion Paper is to focus greenfield, satellite city and township growth along Adelaide's four major transport spines (including Main South Road):

"The Commission is proposing four areas outside, or on the fringe of, metropolitan Adelaide to investigate for future housing and employment growth. These investigation areas extend from Adelaide's four major transport spines to leverage infrastructure investment. The Discussion Paper further details why these areas have been identified and the challenges associated with potential future growth."

Whilst the Discussion Paper suggests that there is a sufficient land available to accommodate a 15-year (short-to-medium term) supply of land (assuming an average growth rate), the availability of land is heavily skewed in favour of the Outer North, with limited land available in the Outer-South to support projected growth in this sub-region, as illustrated in **Figure 3-1**. The disparity in the distribution of land for housing is also illustrated in **Figure 3-2**, taken from the Land Supply Report (July 2023). This report makes the following conclusions with respect to the distribution of land:

- "The total potential supply within the 'metropolitan fringe' regions is significantly greater than the 'township' regions."
- The dominance of zoned greenfield land supply in the Outer North compared to the Outer South and Adelaide Hills regions.
- The relatively small amount of development ready supply across the Fleurieu, Murray Bridge, and Northern Plains & Barossa regions.
- The significant amount of future urban growth area land within the Fleurieu Peninsula region, much of which is located within the townships of Goolwa and Victor Harbor fact is also acknowledged in the Land Supply Report for July 2023."

(underlined for emphasis)

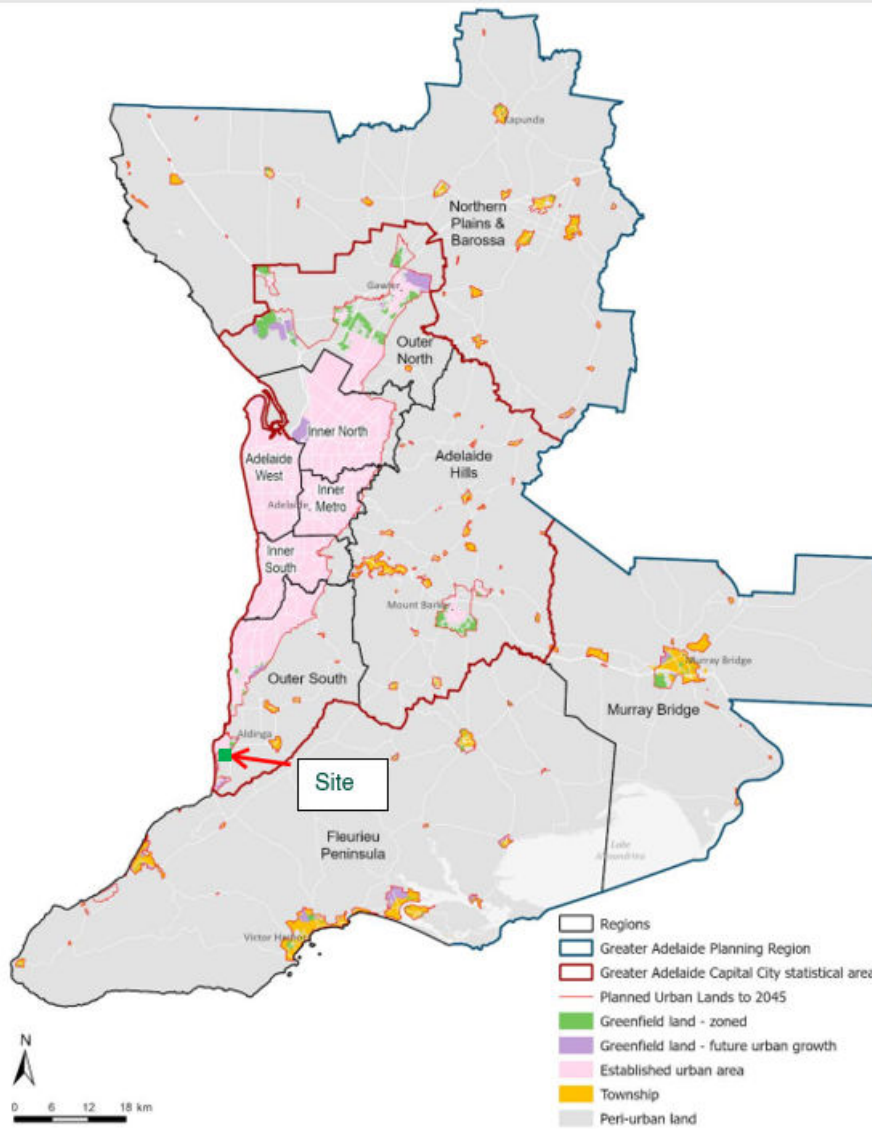
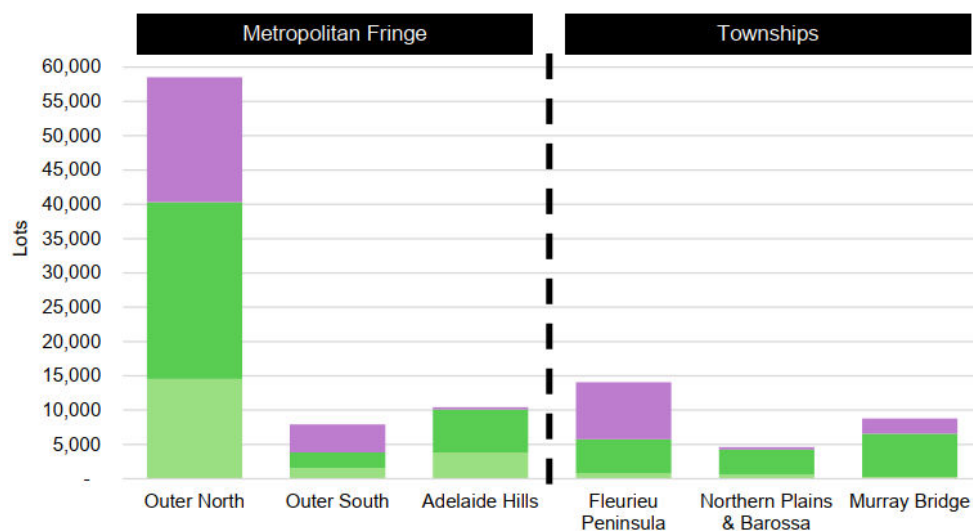


Figure 3-1 – Greenfield land: Zone (Green), Future Urban Growth (Purple) – *Source: GARP Discussion Paper*



SUPPLY TYPE	Outer North	Outer South	Adelaide Hills	Fleurieu Peninsula	Northern Plains & Barossa	Murray Bridge
Development Ready	14,550	1,550	3,800	850	600	300
Undeveloped Zoned	25,750	2,250	6,250	4,900	3,600	6,300
Future Urban Growth Area	18,200	4,050	340	8,300	400	2,200
TOTAL	58,500	7,850	10,390	14,050	4,600	8,800

Figure 3-2 - Greenfield land supply by sub-region. *Source: Land Supply Report (July 2023)*

Greenfield land supply constraints in the Outer South are predominantly attributable to existing environmental constraints, and most notably the EFPA and CPD boundaries. Despite this, the Commission also notes within the Discussion Paper (Pg. 103) that land within the CPD will not be investigated when considering future growth options, and that the EFPA boundaries will only be considered once the existing 15-year supply of land has been exhausted:

“The Commission also recognises the value of heritage and character areas. We acknowledge these areas offer limited opportunity to accommodate growth. The Commission will not investigate the Barossa and McLaren Vale Character Preservation Districts (CPDs). The Commission will also not review the Hills Face Zone, or smaller townships (such as Myponga and Carrickalinga).

The Environment and Food Protection Areas (EFPAs), along with the CPDs, cover 89% of the Greater Adelaide Region as demonstrated in Figure 1. The EFPAs primarily preclude land division for residential development and protect our prime food and wine regions from urban encroachment. Variations to the EFPAs can only be made if a 15-year supply of urban land cannot be identified outside of those areas, so the Commission will only look to the EFPAs to accommodate long term growth.”

3.2. Alternative Policy Approach

3.2.1. Distribution of future land supply

It is apparent that whilst sufficient land may be available to support Greater Adelaide's population growth projections for the next 15 years, the availability of such land is heavily skewed in favour of the 'Outer North' as well as satellite townships such as Two Wells, Roseworthy, Murray Bridge, Goolwa and Victor Harbor, with very limited growth opportunities being investigated at the Metropolitan Adelaide Fringe. Further, the Discussion Paper identifies that no land is being investigated for possible future growth in the Outer-South of Metropolitan Adelaide, and also confirms and acknowledges that available land in the 'Outer-South' remains in scarce supply.

To this end, it is essential for the GARP to address not only the question of housing supply, but also the spatial distribution of land supply and housing across Greater Adelaide, accounting more specifically for the projections in population by sub-region. This requires a review of the urban growth potential within sub-regions such as the Outer South where urban land is in scarce supply.

Importantly, the residential housing market is not homogenous and requires different product types, different geographic locations and different price points to satisfy a cross-section of purchasers. Put simply, an acute shortage of land for residential purposes within the Outer-South of Metropolitan Adelaide cannot be addressed by the provision of surplus zoned residential land within the northern Adelaide plains.

In our opinion, the lack of strategic foresight to address the apparent land supply shortage in the Outer South has the potential to undermine the Commission's concept of 'Living Locally', described within the Discussion Paper (Pg 84) as follows:

"Living Locally means locating housing, jobs and services closer together so people can meet most of their daily needs within a comfortable walk, ride or public transport journey from home. Living Locally aims to create connected, convenient, cohesive and climate-smart communities, and to reduce the need for long distance car travel, with an emphasis on physically active travel."

To align with the concept of 'Living Locally', it is essential for the GARP to consider not only the availability of land, but also the distribution of land across Greater Adelaide. An effective GARP would seek to ensure that the release of land for housing is commensurate with the projected rate of growth in population by sub-region. This in-turn would enable long-standing residents within the Outer South to remain within the Outer-South, close to family, places of employment, local schools etc.

3.2.2. Review of McLaren Vale Character Preservation District

As previously discussed, the boundaries of the McLaren Vale CPD represents a significant impediment to the release of appropriate land within the Outer South to support projected population growth rates.

For context, the location of the site relative the boundaries of the McLaren Vale CPD is reflected in **Figure 3-3** below.

To unlock additional land within the Outer South, it is recommended that the boundary of the CPD be adjusted to follow the alignment of the Main South Road (illustrated by the yellow arrows in **Figure 3-3**). The effect of such a change would be that appropriate land to the west of Main South Road could be used for housing, thereby addressing sub-regional growth projections in the Outer-South together with Greater Adelaide's longer term (30 year) growth rate projections, whilst also ensuring the protection of land east of Main South Road for continued primary production activities. This boundary generally aligns with the existing land use activities with aerial photography clearly indicating a greater intensity of primary productive uses occurring to the east of Main South Road (when compared with the western side of Main South Road).

This is consistent with the boundaries of the 'Primary Production Priority Area' (PPPA) developed by Primary Industries of South Australia (PIRSA).

PPPA's have been created in response to Planning Strategy directives including the '30 Year Plan for Greater Adelaide' to identify '*areas of primary production significance*' (Government of South Australia, 2010, P. 106).

PPPA's have been identified with reference to a variety of factors including "*land capability, industry investment and land use, access to water, climatic considerations (including anticipated climate change) and any local conditions that give rural land special significance for primary production*" (Location SA, 2010).

Importantly, the PPPA boundary (Identified by green shading in **Figure 3-4** below) follows the alignment of Main South Road, with all land to the west of the Main South Road situated beyond the PPPA boundary

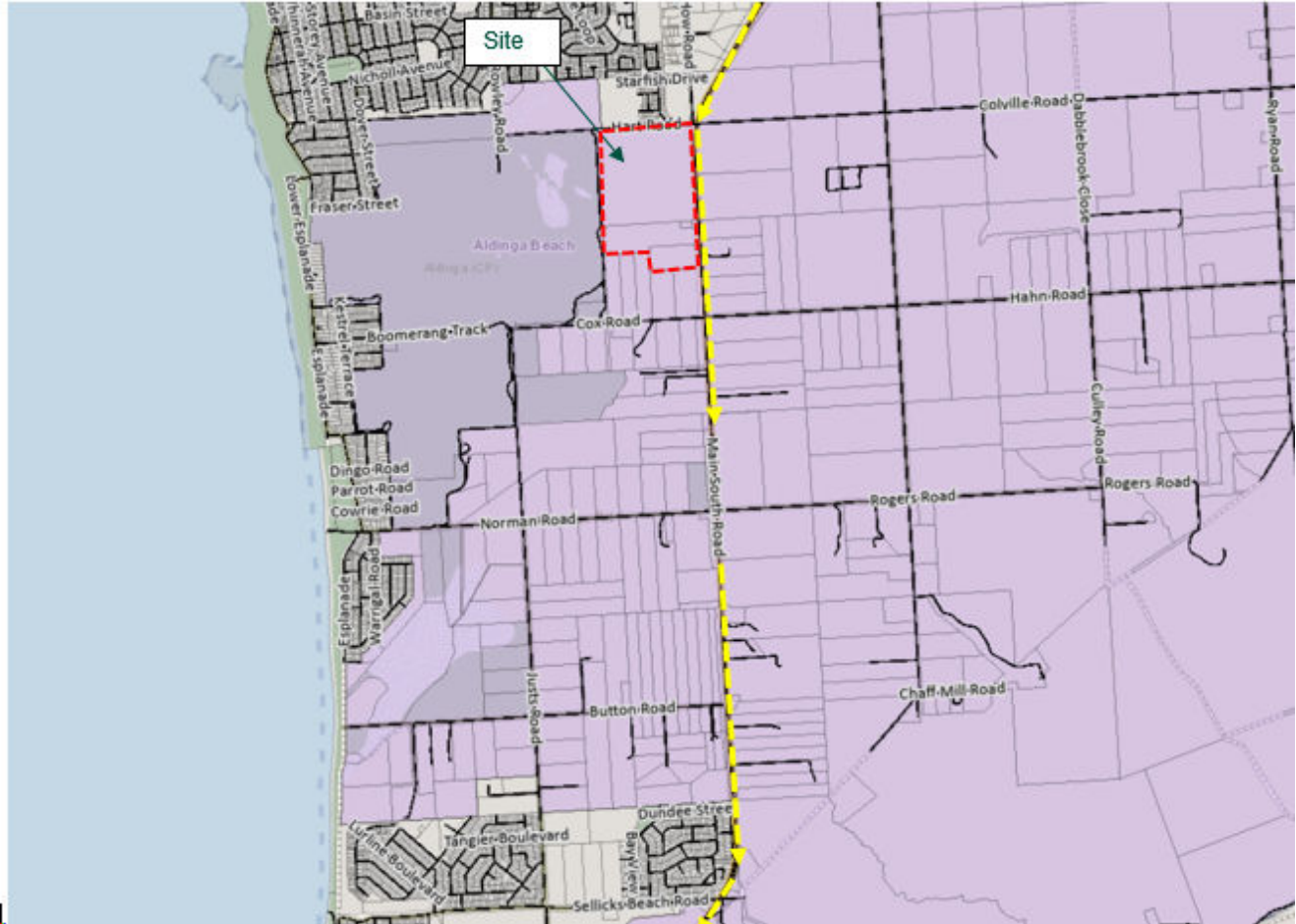


Figure 3-3 - McLaren Vale Character Preservation District (Hatched Purple)

Accordingly, to unlock additional land within the Outer South, it is our opinion that the CPD boundary should therefore be adjusted to follow the alignment of the Main South Road (illustrated by the yellow arrows in **Figure 3-3**). This would result in appropriate land to the west of Main South Road available for housing, thereby addressing sub-regional growth projections in the Outer-South together with Greater Adelaide's longer term (30 year) land supply targets. Importantly, valuable primary production land (identified PPPA land) to the east of Main South Road would continue to be retained and protected for this purpose, protecting the special character of the district.

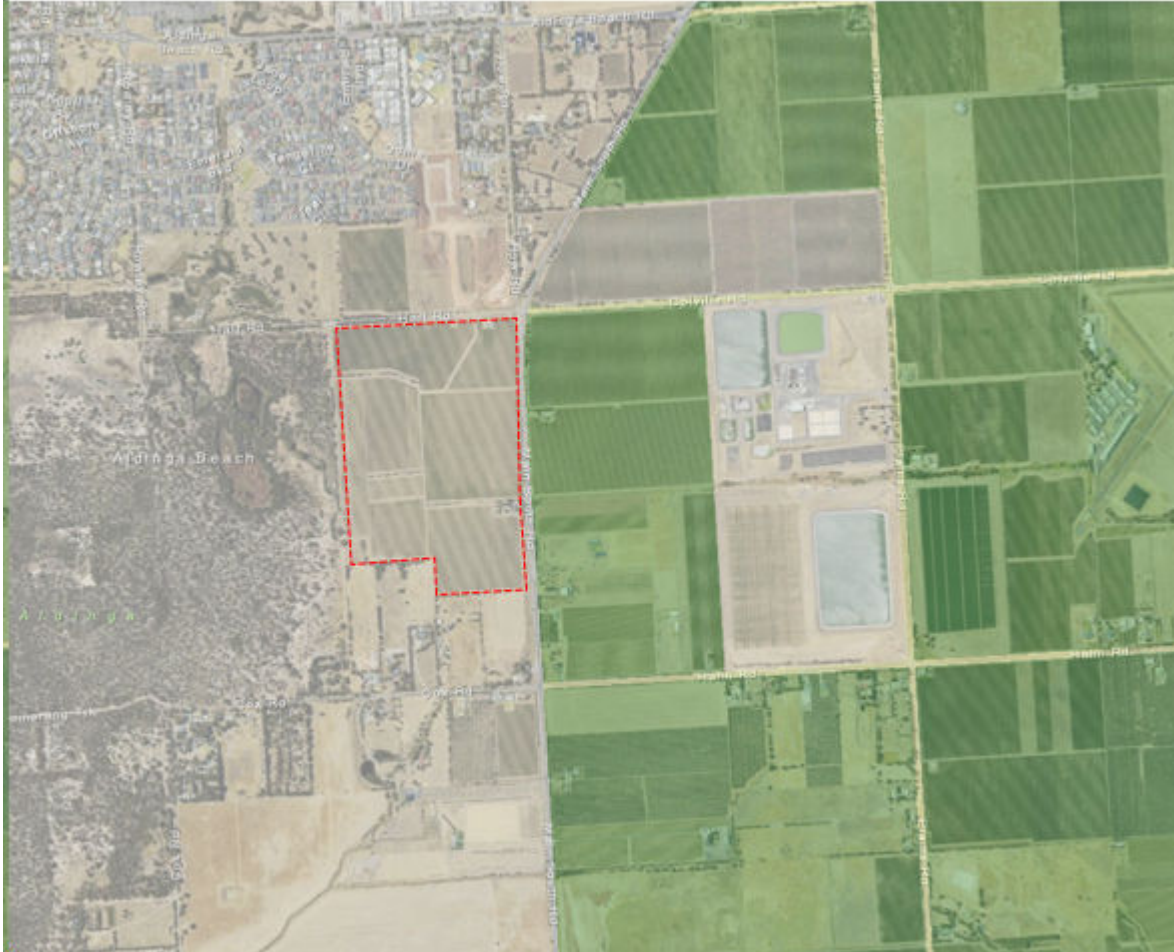


Figure 3-4 - Primary Production Priority Areas (shaded green). *Source: Location SA*

Main South Road would provide a clearer physical and logical barrier and break, as well as an administrative boundary, to define the outer edge of Metropolitan Adelaide, whilst still also reinforcing a defined interface and buffer between primary production activities and future urban development. Importantly, open views will be retained from Main South Road to the east over valuable primary production priority areas that are punctuated by the natural backdrop of the Adelaide Hills escarpment, proving and maintaining the important aesthetic and operational character of the McLaren Vale district.

4. SITE SUITABILITY FOR URBAN DEVELOPMENT

4.1. Logical Urban Expansion

The site is situated on the outer edge of the 'Planned Urban Lands' boundary, which is delineated by Hart Road to the north. The site is also directly to the south of the Aldinga Green residential estate, which is located within the 'Master Planned Township Zone'.

Accordingly, the site's proximity at the fringe of the existing urban growth boundary represents a logical and contiguous extension to the established urban growth area, unlocking additional land to support future urban growth within the Outer South of Metropolitan Adelaide.

Importantly, the site's use for future urban growth would not result in the fragmentation of the existing primary production land. Excluding the site itself, no other adjoining land is being used for horticultural purposes. Land to the west is occupied by the Aldinga Scrub, whilst adjoining land to the south accommodates rural residential land holdings and land to the north is being developed with housing.

The horticultural use which occupies the site also surrounds an existing dwelling located at 3496 Main South Road, and there is no buffer between viticultural activities and this existing dwelling. Accordingly, future use of the land for urban growth also has the potential to address existing interface issues often encountered when horticultural activities occur in proximity to sensitive receivers.

Finally, as a large, consolidated site, which is under single ownership, the land in question is highly conducive to future urban growth and development.

4.2. Development Potential of Site (Capacity)

Referencing 'State Planning Policy 6 – Housing Supply and Diversity', the Discussion Paper acknowledges the need to *"ensure land supply responds to future demand, as informed by population projections and demographic trends"* and to *"provide a range of well-designed, diverse, and affordable housing options across the region"*.

Assuming a yield of say 15 dwellings per hectare (gross) and noting the existing land area of 45.89 hectares, the subject land could yield in the order of approximately 690 dwellings. Assuming 60% of the land is used for residential purposes, and the balance of land is used for non-residential purposes (roads 25%, open space 12.5%, utilities and stormwater 2.5%) this would equate to a nett density of 25 dwellings per hectare, with an average lot size of 400 sqm.

The provision of an additional 690 dwellings would amount to an additional 18.6% of the 3,700 homes identified by State Government in its recently announced land supply release in Hackham (2,000 homes) and Sellicks Beach (1,700 homes). These additional homes will also assist to address the Outer-South's 20-year (2021-2041) population projection of 27,087 people, assuming a medium growth rate¹.

¹ Figures taken from the document: Population Projections for South Australian and Regions – 2021 to 2051

4.3. Site Opportunities and Constraints

4.3.1. Physical Features and Propensity for Development

The physical features of the site are conducive to future urban development.

The site is generally flat and has been substantially cleared to accommodate the existing horticultural land use. Accordingly, the site appears substantially (if not entirely) devoid of Native Vegetation as well as Regulated and Significant Trees.

The State Significant Native Vegetation which occupies the western end of the site does not unreasonably constrain the development potential of the land. To the contrary, the Overlay preserves an appropriate buffer to the Aldinga Scrub, and also creates an opportunity to accommodate public open space connections with Aldinga Scrub, as well as future open space connections with Aldinga Green to the north.

The site is subject to an assessment against the 'Airport Building Heights (Aircraft Land Area) Overlay', which imposes limitations on the height of buildings in proximity to the Aldinga Airport. The site is positioned some 1.7km west of the airport and accordingly the height of residential buildings on the site would not be unreasonably constrained by the proximity of the airport.

4.3.2. Infrastructure, Transport & Connectivity

A key strategic outcome stated within the Discussion Paper is to accommodate urban growth in areas that can capitalise on the \$685 million investment committed by federal and State governments to the Main South Road and Victor Harbour Road duplication projects.

The site is ideally positioned at the fringe of the Planned Urban Lands boundary, and directly adjoins planned (Stage 2) upgrade works proposed for Main South Road. In addition to its frontage to Main South Road, the site's frontage to Hart Road provides multiple options for vehicle access and movements, and also creates an opportunity for future vehicle and pedestrian connectivity to Aldinga Green to the north.

As previously discussed, the site is located approximately 1km south of the Renewal SA Master Planned development site, which includes land set aside for the future Seaford to Aldinga rail extension, railway station and Park 'N' Ride facility. Accordingly, the site is also well connected to future transport infrastructure investment by the State and is also aligned with the Commissions 'Living Local' concept which seeks to position housing in proximity to public transport to support a shift towards lower emission transport modes.

Terminating at the southern end of the RSA site (adjacent Aldinga Beach Road), the alignment of the preserved rail corridor also creates an opportunity for a further extension of the rail corridor to the south. This would follow a logical contiguous alignment to the west of Main South Road which is shown indicatively in **Figure 4-2** below. Positioned approximately 1.2km from the planned Park 'N' Ride facility to the north, the subject site would also be ideally located to accommodate a possible future railway station on this extended rail corridor, facilitating the opportunity for future Transport Orientated Development (TOD) at higher dwelling yields – providing further up-lift opportunities and maximising the highest and best use of this strategic land.



Figure 4-1 – Indicative Rail Corridor Extension Opportunity

4.3.3. Service Infrastructure

In the context of the site's location at the fringe of the 'Planned Urban Lands' boundary, and directly adjacent the Aldinga Green estate, the site is likely to have adequate infrastructure capacity and/or augmentation capability.

The site's proximity to established and emerging residential housing developments is also aligned with the Commissions desire to focus new development where established infrastructure exists and where investment in new or upgraded infrastructure is proposed:

"The capacity of infrastructure to support growth varies across locations. Focusing new growth in locations with existing services and facilities is the best option. Doing so also benefits the broader community by reducing the cost of new transport, education and health care, and new trunk infrastructure for water, sewer and electricity." (Pg. 92)

4.3.4. Social and Economic Infrastructure

The site is ideally positioned within 2.5km's of a variety of complementary services and facilities including:

- Walking and cycling trails within public open spaces including trails within the 'Aldinga Conservation Park' and 'Hart Road Wetlands', together with the coastal linear reserve and Aldinga Beach;
- Various pre-schools including Aldinga Community Kindergarten, Edan Academy Aldinga, Aldinga Beach Children's Centre and Aldinga Payinthe College, as well as primary and secondary schools including the Aldinga Beach B-7 School, Cardijn College, Southern Vales Christian College, Aldinga Payinthe College;
- Shopping centres and medical service, including the 'Aldinga Central Shopping Centre' and the 'Aldinga Medical Centre'; and
- Aged care facilities including the 'Resthaven Aldinga House Respite Services'.

In addition, the site is positioned in proximity to future facilities including a new educational establishment identified within the Renewal SA master-planned development site Draft Structure Plan (**Figure 1-4**).

4.3.5. Viability for Primary Production

As discussed in Section 3.2.2 above, and identified in **Figure 3-4**, the site sits beyond the boundaries of the 'Primary Production Priority Area' (PPPA) developed by Primary Industries of South Australia (PIRSA).

In any event, the value of the site for primary production purposes will be further diminished following the compulsory acquisition of approximately 3 hectares of land for road widening.

4.3.6. Cultural Heritage

Although subject to further investigation a search of the Taa Wika Register of Aboriginal Sites and Objects has identified no entries for Aboriginal sites or documented heritage within 60 metres of each allotment.

5. CONCLUSION

This letter has been prepared in response to the GARP Discussion Paper, on behalf of G.P.L (No. 3) Pty Ltd who owns and controls land located at Lots 782 and 790 Main South Road, Aldinga Beach. We have reviewed the Discussion Paper in the context of a desire expressed by company directors to develop the land for residential purposes.

Having reviewed the outcomes expressed by the Commission within the Discussion Paper, it is our opinion that the Greater Adelaide Regional Plan should include strategies to address an apparent critical shortfall in available land for housing within the Outer South. Whilst the Discussion Paper identifies a 15-year supply of land to accommodate Greater Adelaide's projected growth in population, the availability of such land is heavily skewed in favour of the Outer North.

In our opinion, an effective strategy to address Greater Adelaide's population growth should consider not only the availability of land for housing, but also the availability of land by location, with due consideration to the projected growth in population rates by sub-region.

On this basis, it is our opinion that the GARP should address the constraints on housing development within the Outer South of Metropolitan Adelaide. This calls for a review and reconsideration of the existing boundaries of the McLaren Vale CPD and EFPA, and the need to carefully and strategically balance the need to supply housing in the right location with the need to protect highly valued primary production land east of Main South Road.

It is also our opinion that the site is appropriate for future urban growth in that:

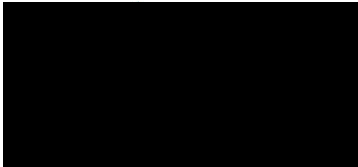
- The site is positioned at the fringe of an existing urban area and would form a logical, orderly and natural extension of the 'Planned Urban Lands boundary';
- The site is ideally located in proximity to the Main South Road duplication project (Stage 2) and will capitalise on investment in significant transport infrastructure;
- The site is located in proximity to the Renewal SA Master Planned development site at Aldinga, including the Seaford to Aldinga rail corridor extension and Park 'N' Ride facility;
- The site is in single ownership, is of an appropriate size and configuration and (subject to further investigation) would appear to have adequate infrastructure capacity and augmentation capability (given its proximity to existing urban development)
- The land will not result in the fragmentation of primary production land and is not situated within a Primary Production Priority Area.
- Our preliminary yield analysis suggests that the land is capable of accommodating in the order of 690 additional allotments, which would assist in addressing the shortfall in the supply of appropriate housing land to address the population growth projection in the Outer South.
- A review of the Taa Wika Register of Aboriginal Sites and Objects has identified no entries for Aboriginal sites or documented heritage within 60 metres of each allotment.

We respectfully ask that this submission informs the preparation of the Greater Adelaide Regional Plan.



Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

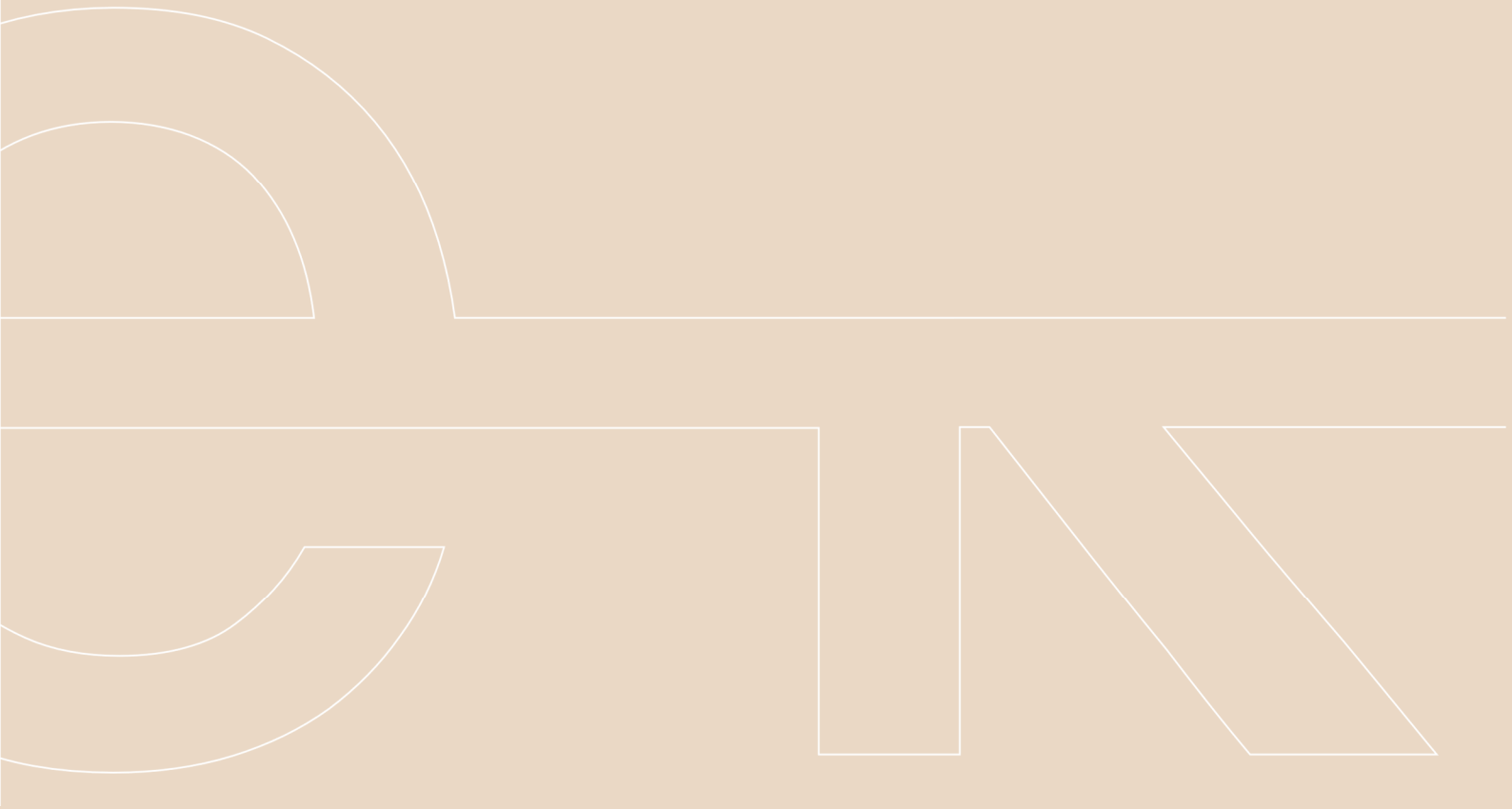
Yours sincerely,



Rob Gagetti
Senior Associate

REFERENCES

- SPC, 2023, *Greater Adelaide Regional Plan Discussion Paper*, Department for Trade and Investment
- DTI, *Population Projections for South Australia and Regions 2021 to 2051 – Summary Report*, Website: https://plan.sa.gov.au/state_snapshot/population/population-projections
- PIRSA, 2018, *Primary Production Priority Areas (Dataset No. 1269)*, www.location.sa.gov.au
- RSA, 2019, *Engagement Report: Final engagement report on the preliminary and draft Aldinga Structure Plan (Updated October 2020)*, Website: <https://renewalsa.sa.gov.au/projects/aldinga>
- DTI, 2023, *Land Supply Report for Greater Adelaide: Residential (July 2023)*, Website: https://plan.sa.gov.au/state_snapshot/land_supply/greenfield-land-supply



DTI:PlanSA Submissions

From: Rebecca Thomas [REDACTED]
Sent: Tuesday, 7 November 2023 8:59 AM
To: DTI:PlanSA Submissions
Cc: James Dibble
Subject: Amended Submission - Gifford Hill - GARP Submission

Importance: High

You don't often get email from [REDACTED]. [Learn why this is important](#)

Amended GARP Submission

Attention: Growth Management Team, Planning and Land Use Services - Department for Trade and Investment

Further to the submission made yesterday on behalf of our client Grange Development and Costa Property Group, please note an updated link to the submission documentation below.

Please use the link immediately below and not the original from yesterday's email.

[REDACTED]

Any queries, please advise.

Kind regards,

Beck Thomas
Director

ekistics

Level 3, 431 King William Street, Adelaide SA 5000

[REDACTED]
www.ekistics.com.au

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

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From: Tammy Kronawitter [REDACTED]
Sent: Monday, November 6, 2023 5:39 PM
To: plansasubmissions@sa.gov.au

Cc: Rebecca Thomas [REDACTED]

Subject: Gifford Hill - GARP Submission

Attention: Growth Management Team, Planning and Land Use Services - Department for Trade and Investment

On behalf of our client, Grange Property, please find a link to a submission in response to the GARP. Should you need further information or have queries of clarification, please make contact at your convenience.

[REDACTED]

Kind regards,

Tammy Kronawitter
Office Manager

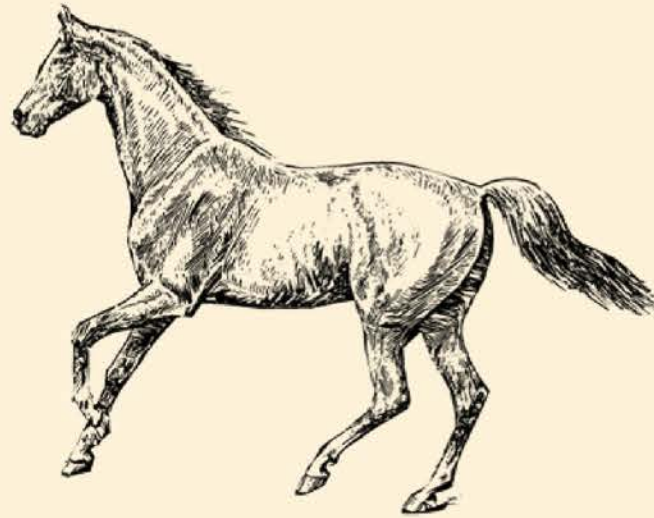
ekistics

Level 3, 431 King William Street, Adelaide SA 5000

[REDACTED]
www.ekistics.com.au

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

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GIFFORD HILL



THE BIG VISION

Our vision for the Gifford Hill Precinct and the broader Murray Bridge region is to forge a **vibrant, sustainable, culturally diverse**, and **aspirational community** that stands as a beacon of excellence for all of South Australia.

Gifford Hill will be future-proofed in its urban design, built form and materiality to deploy **forward-focused principles** to complement the existing beauty and amenity of Murray Bridge, offering residents the opportunity to live, work, and play amidst a semi-rural lifestyle.

Gifford Hill and Murray Bridge are bound together as one, poised to catalyse a transformation that elevates this region to a symbol of aspiration and progress, setting a pioneering example for the entire state. **We will lead, not lag**. Through sustainable practices, encompassing the use of mass timber construction, biophilic design principles, water capture and reuse (WSUD), and a commitment to rewilding and protecting existing vegetation, we are resolute in our mission to fortify the precinct against the challenges of climate change, fostering a sense of pride among its residents.

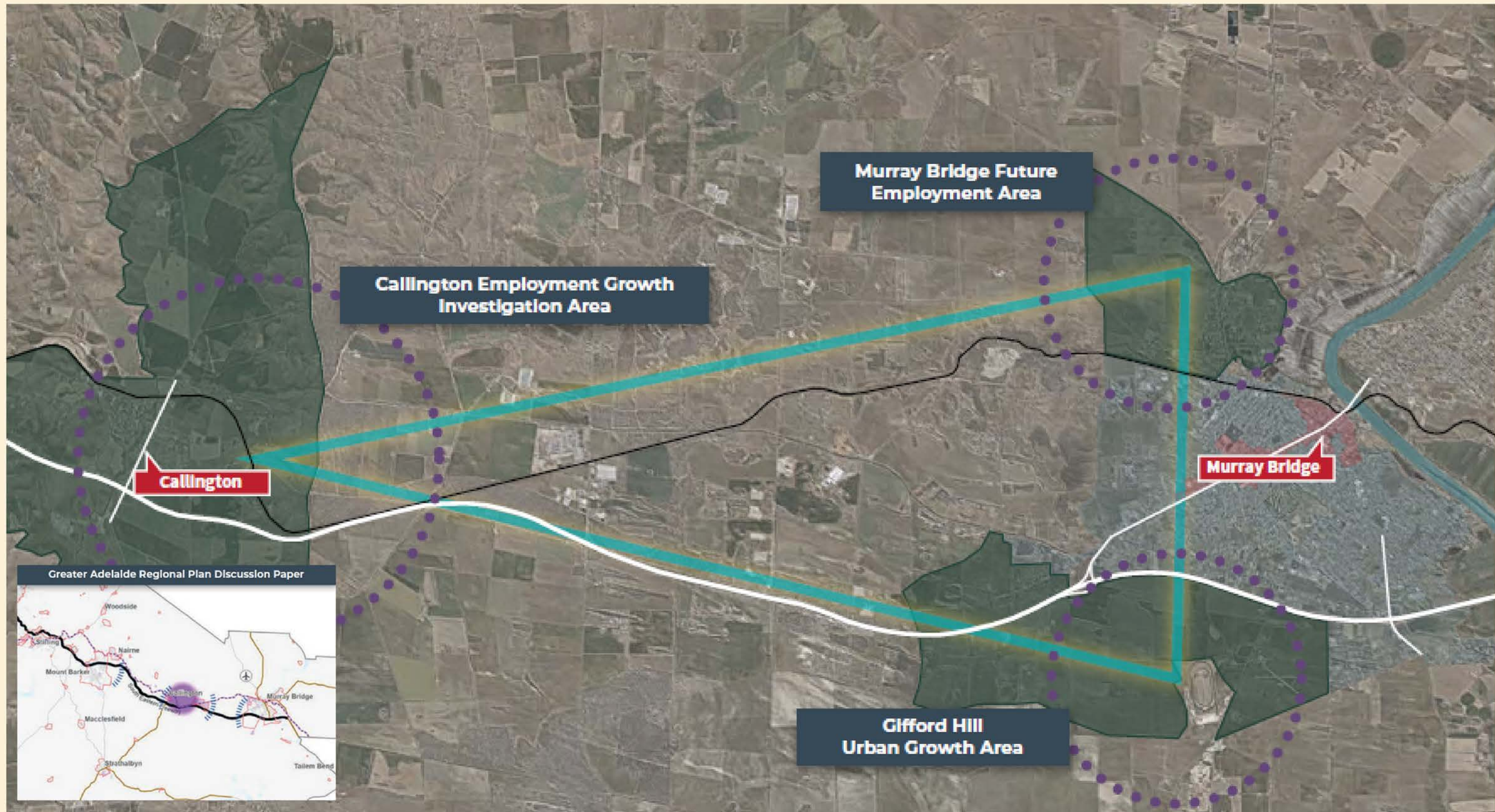
Our commitment is to craft a world-class town centre with **cutting-edge digital infrastructure**, empowering individuals to embrace a dynamic and hybrid lifestyle that will become more prominent as time goes on and provide the critical infrastructure to allow this entertainment and professional services precinct to engage digitally with the world.

The Gifford Hill Precinct pays homage to its equine heritage and the **thoroughbred DNA that runs through its veins**, seamlessly integrating the racecourse with the town centre. Bridle trails, a trainer's village, and top-tier horse facilities, including dressage arenas, will intertwine throughout the precinct via equine trails, infusing recreation, sports, and entertainment into the very essence of our community.

Murray Bridge possesses the potential to emerge as an economic powerhouse within the state, strategically nestled in the golden triangle between the Monarto/Callington and Murray Bridge employment growth areas. Gifford Hill is not a mere project; it represents a visionary quest to establish a sustainable, prosperous, and harmonious community that sets unprecedented standards, not just for South Australia, but as a shining example for the country to admire and emulate.

Gifford Hill, Murray Bridge, One Town, One Vision.

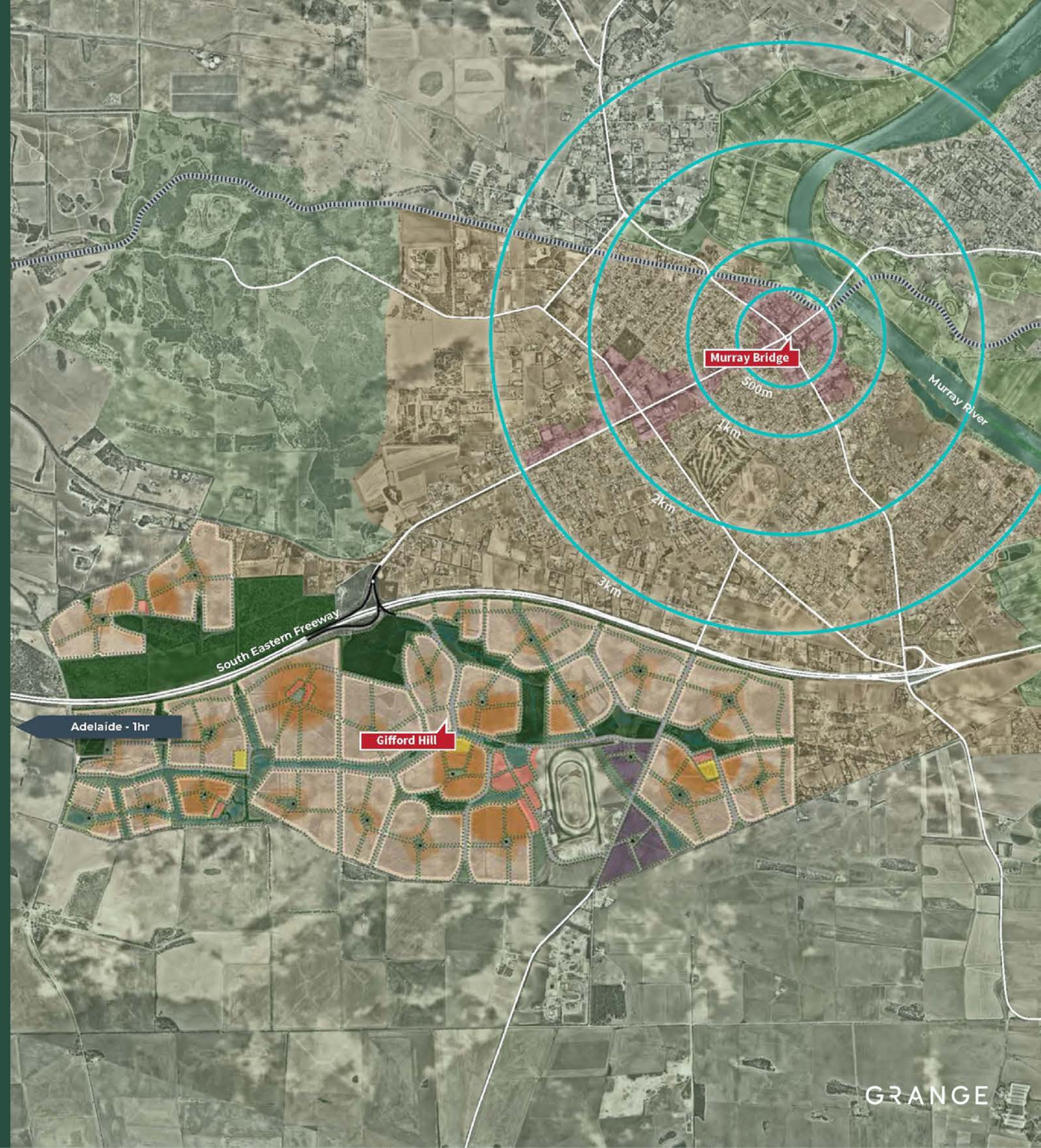
Regional Context

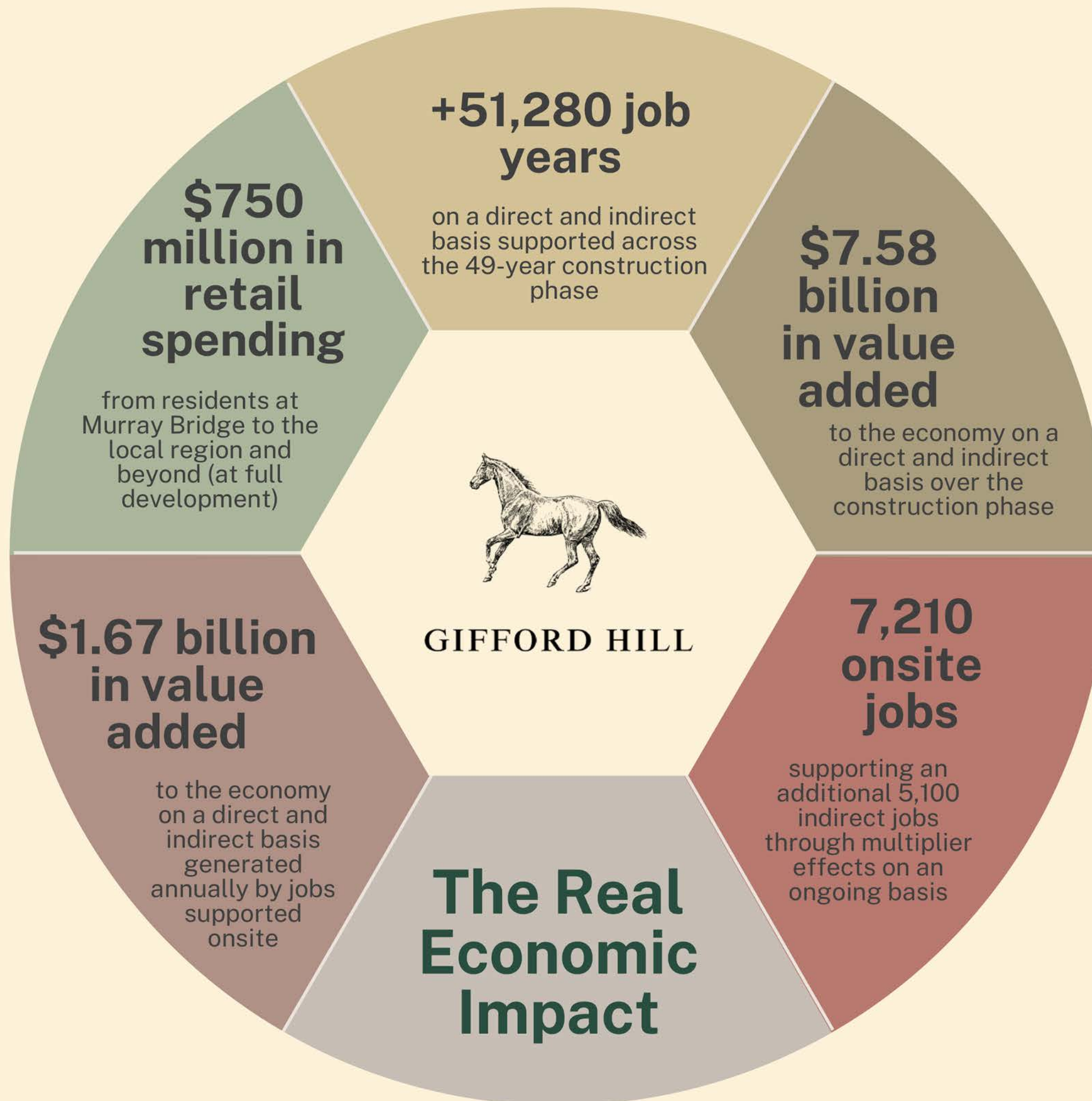


The **Live-Work-Play** Golden Triangle

Smart & sustainable growth for the Eastern Spine

Gifford Hill provides an unprecedented opportunity to enable smart and sustainable urban growth for the region, supporting Murray Bridge as the Second City for South Australia. Healthy and connected communities will be integrated with employment and education, and grounded in a lifestyle connected to the natural environment, local history, and abundant green space.





Development Pillars

Gifford Hill



Healthy Connected Communities

- » Housing clustered around local parks to build local community connections
- » Local streets as social spaces
- » Community facilities, gardens, farming
- » High amenity neighbourhoods with connected networks of walking and cycling paths supporting active transport and shared mobility
- » Walking, cycling and recreation integrated with green links
- » Provide legible and efficient connections to Murray Bridge



Sustainable Living

- » Renewable energy, energy storage and energy efficient housing
- » Convenient access to local employment
- » Local food production
- » Water sensitive urban design and green streets
- » Active transport priority to reduce car use
- » Provide the daily needs of residents within a short walk or cycle trip
- » Adopt neighbourhood-scale water and energy strategies to reduce environmental footprint for carbon negative outcome



Environmental Regeneration

- » Establish ecological corridors for habitat, ecological links and regeneration of natural systems
- » Living streams, wetlands and natural drainage systems for climate resilience
- » Retain landform and natural topography



Unique Place Character

- » Create a network of distinct walkable neighbourhoods, each with a discernible centre and edge
- » Celebrate existing landscape features through the urban design, view-lines, public spaces and green and blue infrastructure
- » Support and enhance Murray Bridge Racing Club as regional attractor / activator, integrated with the future town centre.
- » Complement and not compete with the existing Murray Bridge township
- » Equine employment lands and integrated commercial services
- » Local employment, entertainment and recreation opportunities



Healthy Diversity and Aspirational Affordability

- » Diversity of lifestyle choices, housing typologies and lot sizes
- » Urban living clustered around services and amenity
- » Hierarchy of centres distributed to enable equitable access to daily needs
- » Affordable housing alternatives for the region

The Macro Economic Changes Ahead and Its **Unprecedented Impact on Housing Supply**

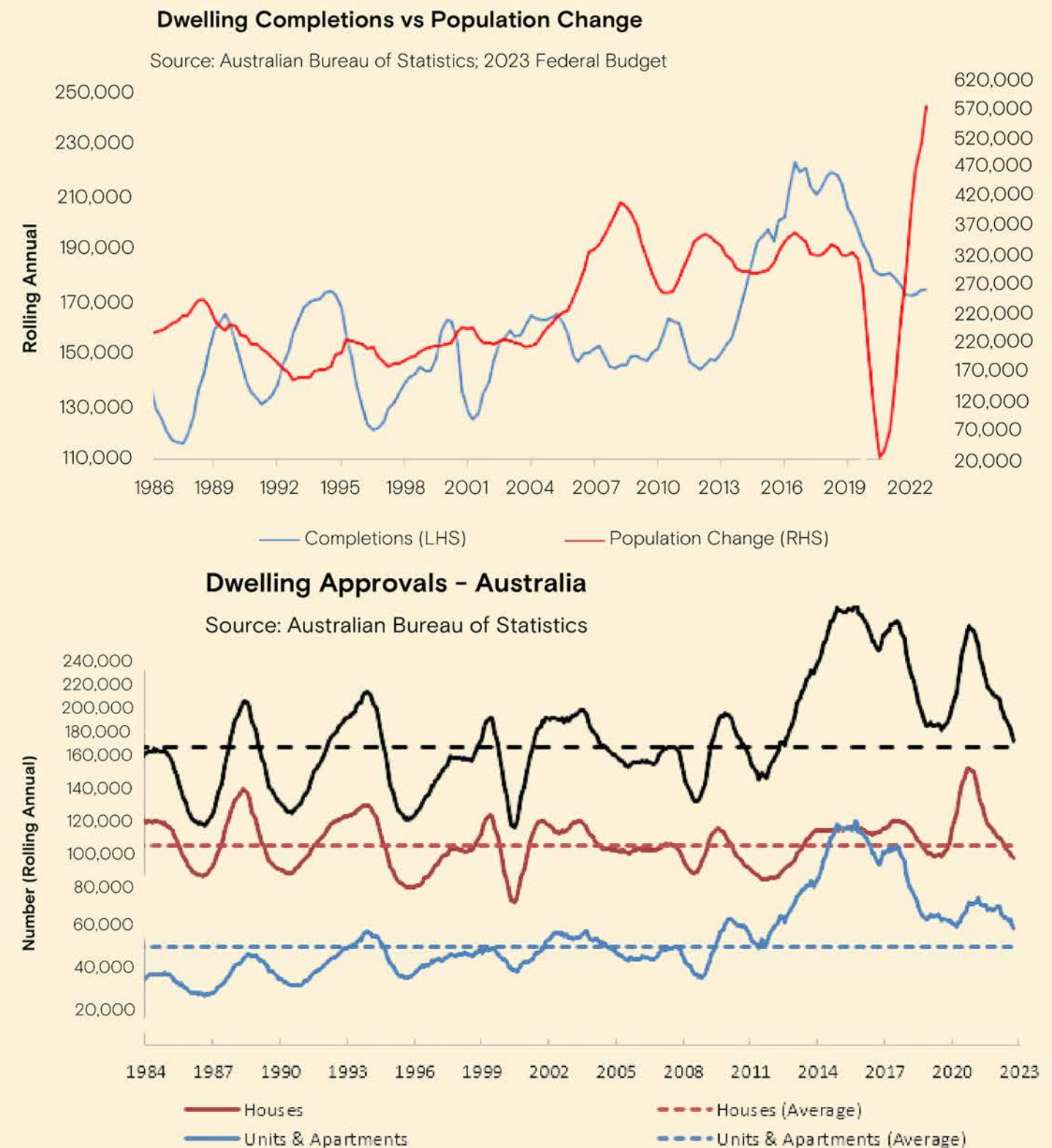
National Housing Supply and Demand Imbalance is due to accelerate.

According to the Australian Bureau of Statistics (2023), there were only **174,400 dwellings** constructed in Australia in the 2022 - 2023 financial year against a **total population increase of 626,000**. This current level of housing supply is below the Albanese Government's target of 1.2 million homes, which requires **240,000 new homes per year**, a **65,600 deficit** for this year. If the homes that were knock down and rebuilds did not add to the overall supply, it shows that only **169,500 dwellings** were added to the nation's housing stock, a **70,500 deficit** for the target number of homes this year.

Given the dwelling approvals data released by ABS for the month of September, it suggests a continuing trend on housing construction rates falling due to the dwelling approvals falling by 4.6% over the month, or to only **13,144 dwelling approvals**.

With the dwelling approvals being bound in the range of **13,000 - 14,000** for the year 2023, it cannot maintain the required housing given the strong population growth and the shortages in the housing supply. In order to meet the Albanese Government's target, there needs to be a dwelling approval average of **20,000 per month**.

Overall, **further interest rate hikes** could constrain construction activity and add to that the **net overseas migration** running at a record rate of around 500,000 per year, implying population growth of more than 600,000, Australia's housing crisis can only get worse. **These scenarios will lead to an even bigger gap between the supply and demand of new homes.**



Housing Supply and Demand Imbalance is due to accelerate Nationally

The greenfield housing supply in Australia's largest city by population, Melbourne, and Adelaide's neighbour, is made up of 55-60% greenfield development and 40-45% infill development over the past decade. However, this is only in **metro Melbourne**. In peri-urban and regional areas, the greenfield supply provides for 70-90% of the total supply in these locations. In short, greenfield markets supply approximately ~70% of all new dwelling generation across the state.

Couple the above statistics with a Victorian policy position of prioritising infill above all else and the reality that built-form projects, for the most part are not financially viable, even if the land value was \$0, due to construction costs rising by approximately 50% over the past four years and revenues increasing by 0-15%. When developers have to maintain the same margin to be funded, and thus this percentage is a constant, land value turns negative. In circumstances where land has already been purchased, the margin falls negative. The result is that built-form projects will not provide the housing supply that the policy position demands, and the supply that does come on the market will need to have a net sellable area rate (NSA rate) of between \$10,000 and \$13,000 per square meter, resulting in apartment prices starting at \$700,000 and quickly surpassing the \$1,000,000 mark.

This dichotomy is significant, as a significant portion of these buyers will flock to more affordable markets, and that is already being represented in the data with Western Australia and South Australia where house prices are bucking the recent downward pricing trend, and an unprecedented amount of capital from developers and businesses is moving to South Australia. South Australia clearly has a significant geographical advantage over Western Australia, and it is our view that South Australia, supported by a logical and consistent infill/greenfield mix that is market-led (and thus provides supply to all sectors of the supply side), **will experience exponential growth over the next decade that it has never experienced before.**

In this Murray Bridge context, as the data in this presentation will show, **it is the only greenfield market in South Australia that provides genuine affordability**, with retail lot prices sitting at sub \$170,000, **49.3% below its comparable greenfield growth areas both in the east and the north**. As such, along with the local employment opportunities in the region that are struggling to provide housing, demonstrated by rental prices **rising more aggressively in Murray Bridge than in any other location in Australia over the COVID-19 period (70%)**, Gifford Hill provides an unmatched opportunity to provide affordable housing supply on the ground. **This supply can be deliverable today with existing infrastructure and job opportunities already in place**

Housing and Aspirational Affordability

South Australia's Housing Market: Unraveling the Affordability Puzzle in Emerging Growth Areas

The ongoing evolution within South Australia's real estate sector has thrust the pressing concern of housing affordability into the limelight. A multitude of intricate factors, including imbalances between the supply and demand of housing, disruptions within supply chains, the restricted availability of viable land for development, and alterations in household configurations triggered by the profound impact of the COVID-19 pandemic, have collectively fostered an unparalleled surge in the pricing of retail lots across the state.

This phenomenon is notably observable within the Eastern Spine region, wherein Mount Barker has prominently emerged as a focal point for growth, providing a viable commuting distance from Adelaide but now is unaffordable for many SA families.

The intricate nature of this situation becomes apparent upon delving into the dynamics of Mount Barker's real estate market. **Recent assessments indicate a notable surge in retail lot prices, with figures averaging just below \$300,000, surging to highs of \$479,000 for a 1120 square meter lot.**

These escalations have consequently driven median house and land prices within a range of \$600,000 to \$850,000, starkly contrasting the 2022 median lot price reported in Adelaide at \$187,250.

This divergence in affordability between the burgeoning Mount Barker and the established Adelaide growth areas becomes a significant focal point in understanding the shifting dynamics of the real estate market in South Australia.

Contrastingly, alternative regions such as Murray Bridge and Gifford Hill have emerged as intriguing revelations in terms of affordability within a commutable distance to Adelaide.

These areas present a marked divergence in retail lot prices, averaging at \$165,374 for a 622 square meter lot, presenting a substantially more affordable option compared to the neighboring Mount Barker, representing a 49.43% lower retail lot price (and thus significant increase in affordability).

This variance not only illustrates the contrasting affordability profiles within South Australia but also hints at the potential for reshaping the landscape of preferred residential **locations within commuting reach of Adelaide, offering more financially accessible options amid the current market dynamics. It is worth noting that the Growth Areas of Buckland Park and Roseworthy in the North are now comparable to Mount Barker.**

Addressing the Affordability Crisis

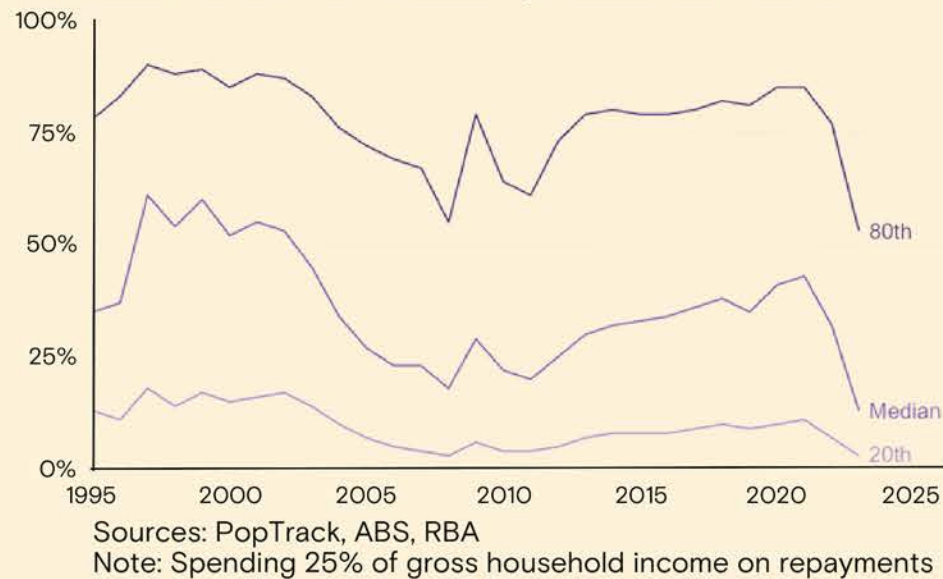
In the past three years, South Australia has seen a 50% surge in home prices and sharply higher mortgage rates, leading to record-low housing affordability, as per the PropTrack Housing Affordability Index. Despite lower average incomes compared to other states, Adelaide's housing market experienced the fastest growth, with the median home price nearing \$680,000. As a result, households can afford the smallest share of homes since records began in 1995.

Housing affordability challenges in South Australia are evident as mortgage repayments for a median-priced home now constitute 35% of the average household income, a record high. This is more than the 31% share in 1988-89 and the recent peak of 33% in 2008. Additionally, it now takes over six years for an average-income household to save a 20% deposit for a median-priced home, which is a year longer than the pre-pandemic period and substantially longer than in previous decades.

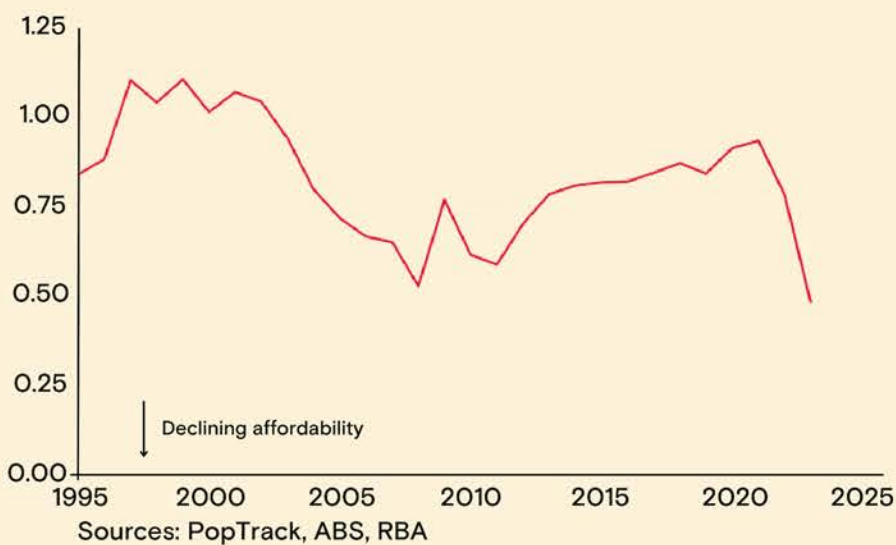
Housing affordability in South Australia hits worst level on record on any metric

South Australia affordability overtime

Affordable share of home sales, by household income



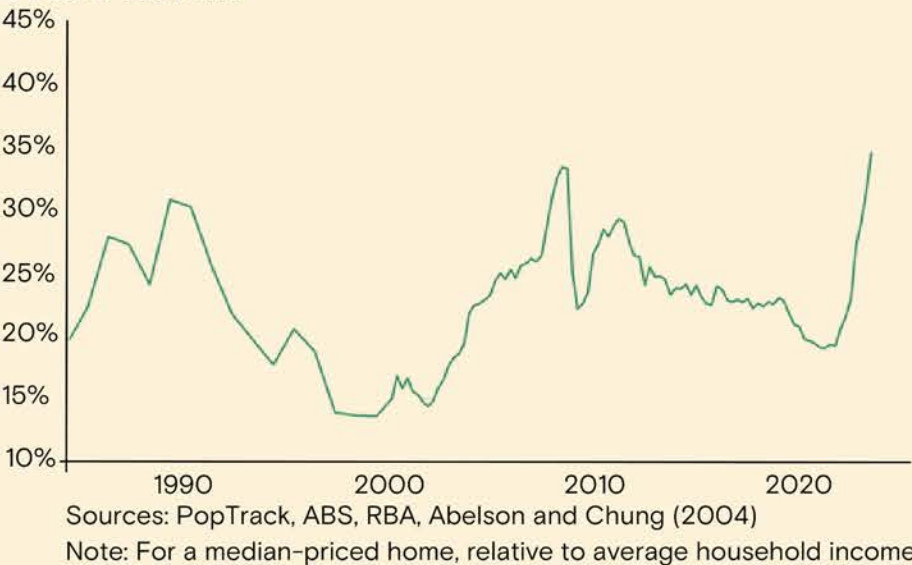
PropTrack Housing Affordability Index South Australia



Mortgage serviceability is worse than at any time in history

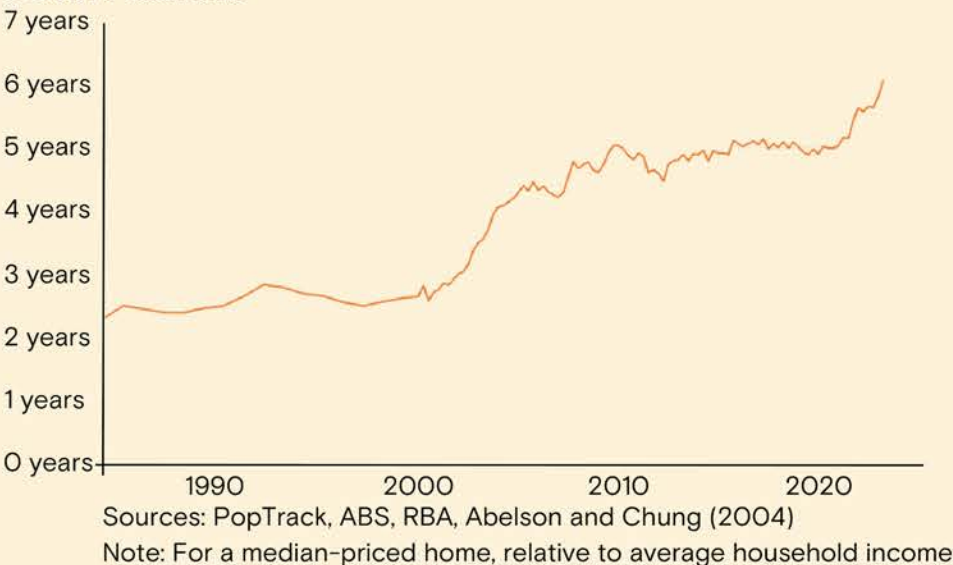
Mortgage repayments as a share of income

South Australia



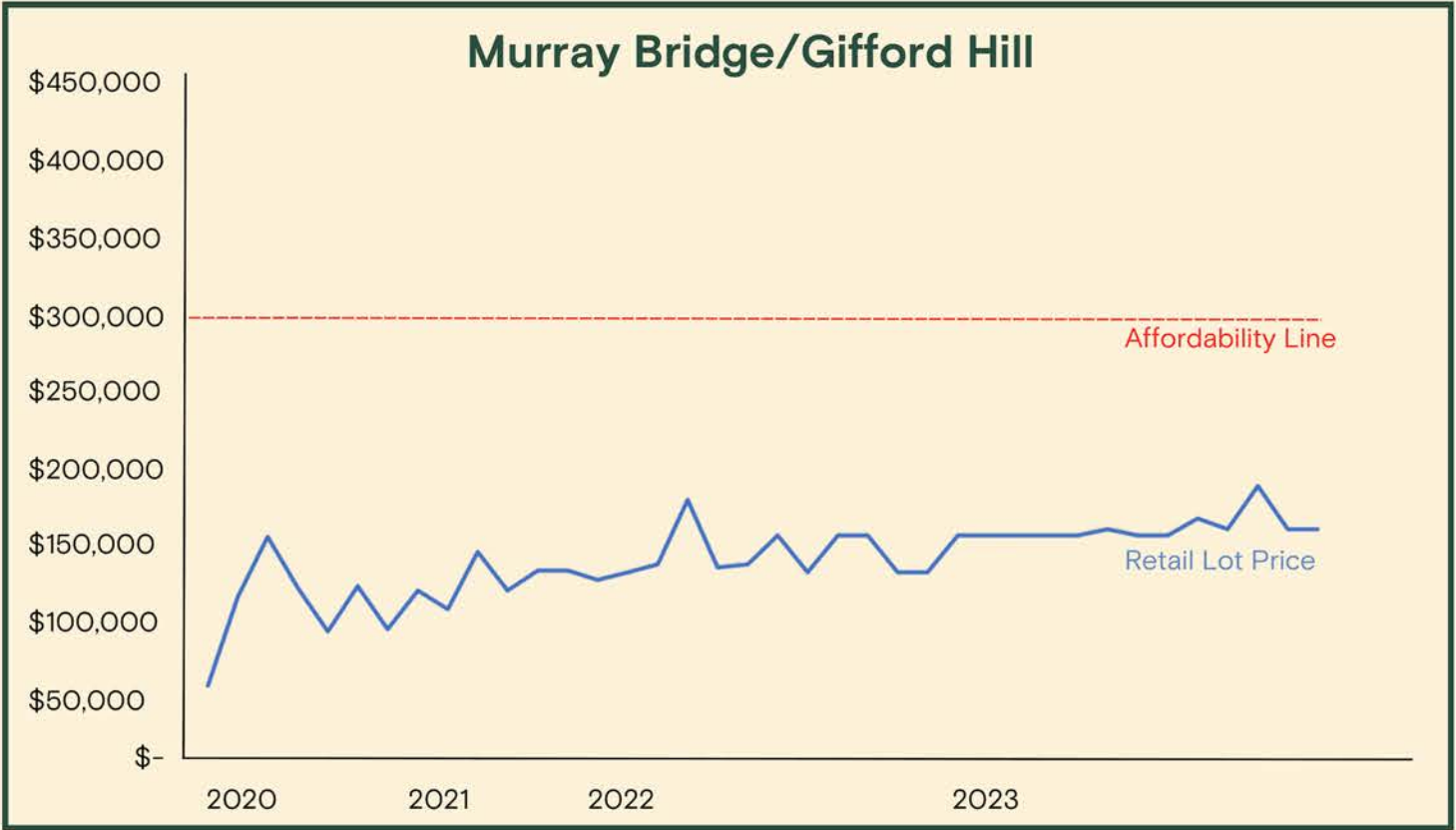
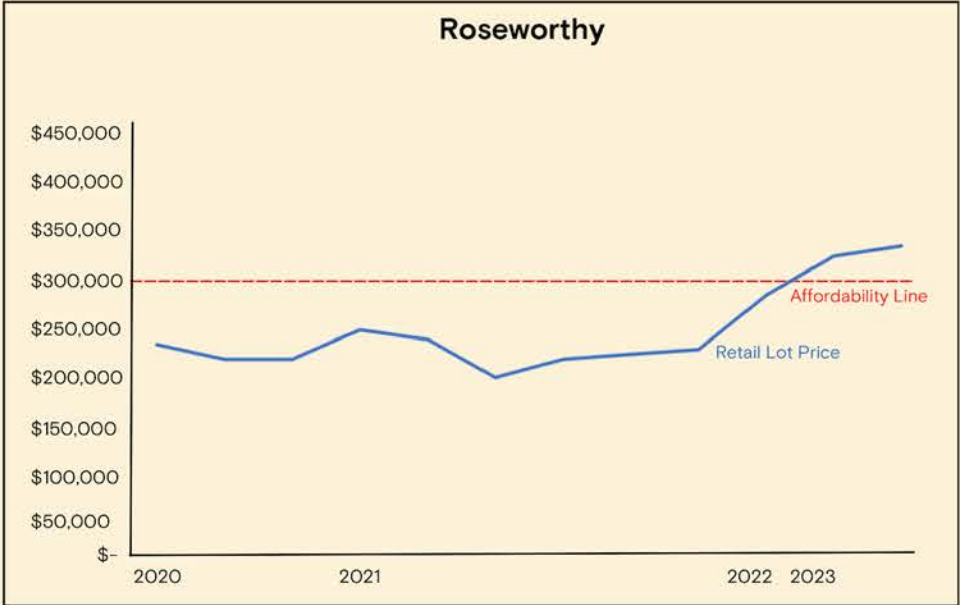
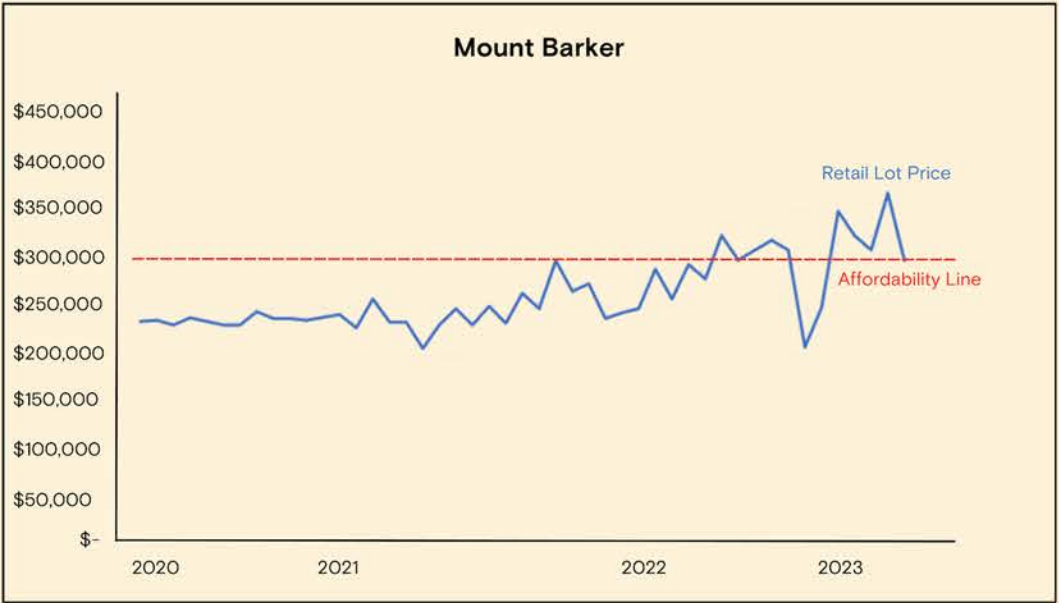
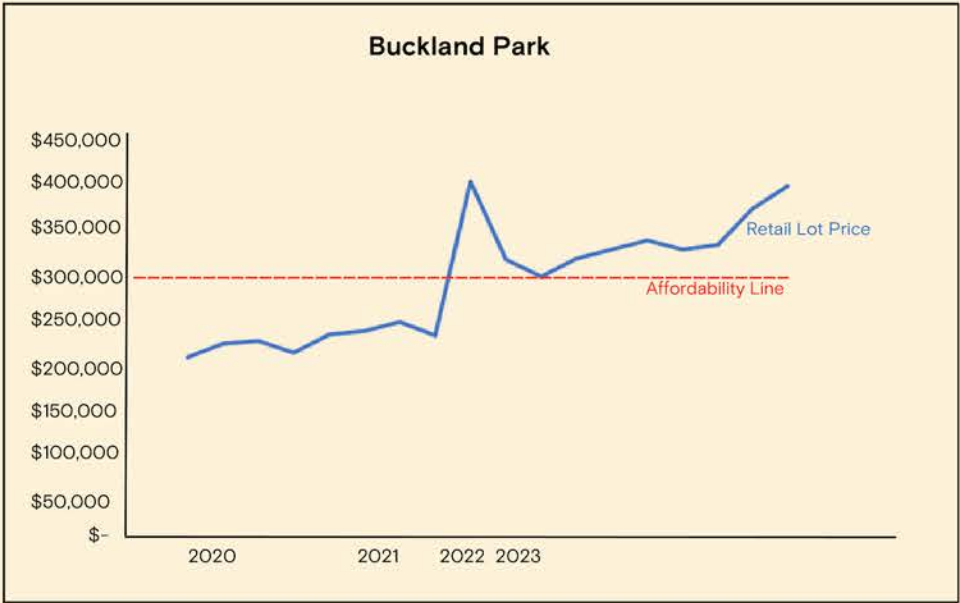
Time to save a deposit

South Australia



Affordability in SA's existing growth areas 2020-2023

The accompanying graphs illustrate the growth and current status of retail lot prices in South Australia's main growth areas, commutable to Adelaide, from 2020 to 2023. Notably, Murray Bridge stands out as the sole region where consumers can find house and land packages that cost 30% or less of their median take-home income, making it a uniquely affordable entry point into the market. Assessed Rates are benchmarked at the median 600m² lot price during the assessed period.



The **Masterplan**

Final Masterplan



Healthy Connected Communities



Housing clustered around local parks to build local community connection



Education and community facilities integrated within neighbourhoods, activity and green space



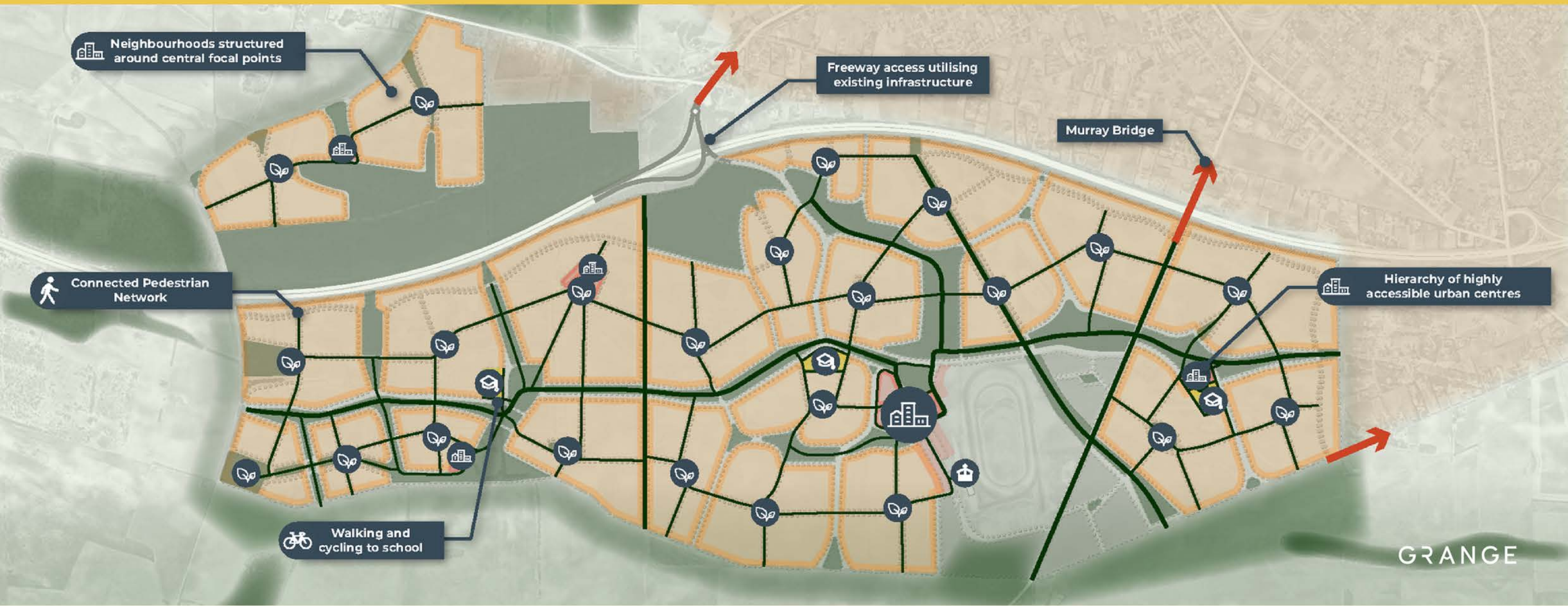
Walkable connected neighbourhoods



Walking, cycling and recreation integrated with green links



Legible and efficient connections to Murray Bridge



Final Masterplan



Sustainable Living



Neighbourhood scale sustainability infrastructure



Convenient access to local employment



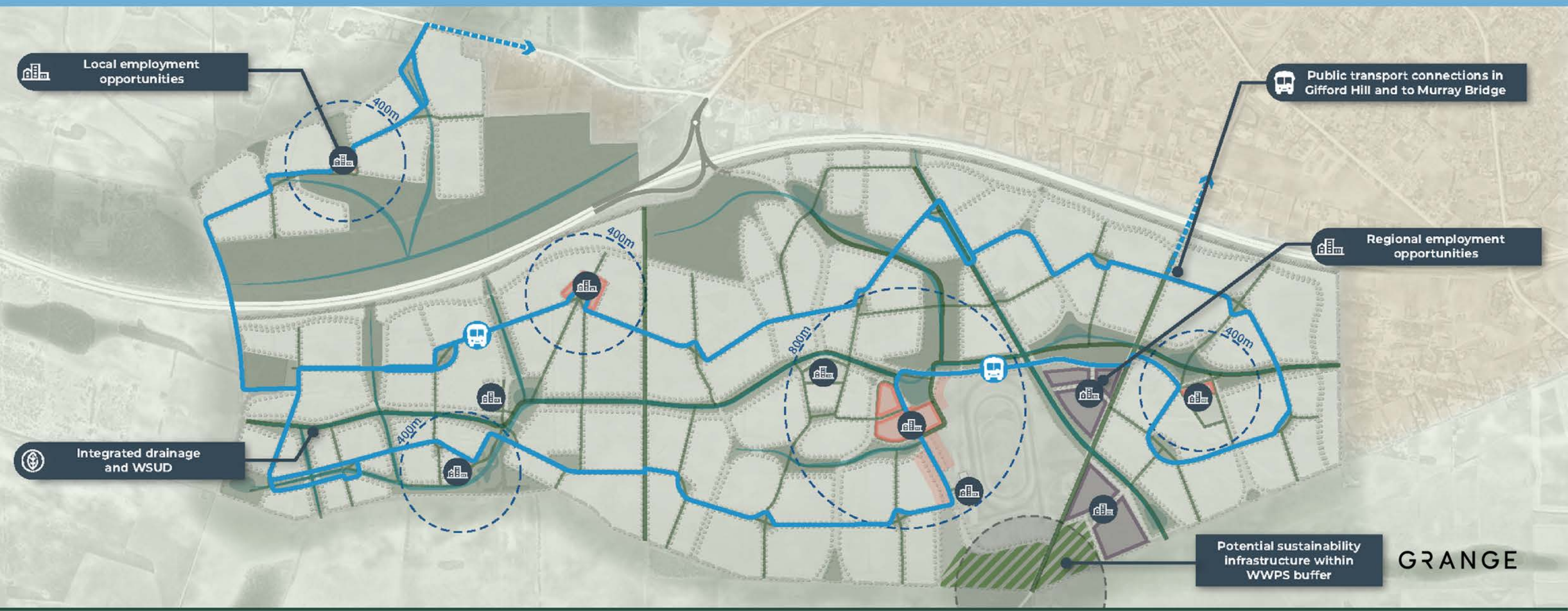
Integrated drainage and water sensitive urban design



Active transport priority to reduce car use



Hierarchy of centres to provide the daily needs of residents within a short walk or cycle trip



Final Masterplan



Environmental Regeneration



Establish ecological corridors for habitat, ecological links and regeneration of natural systems



Living streams, wetlands and natural drainage systems for climate resilience



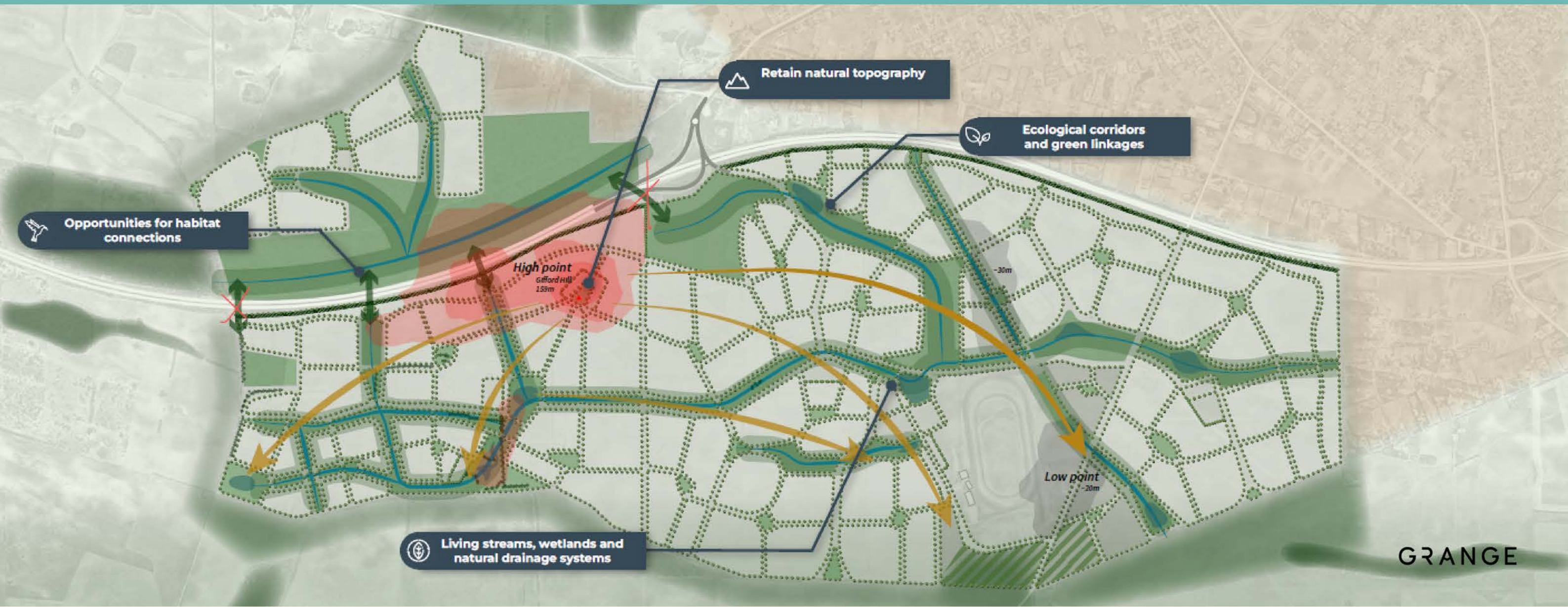
Retain landform and natural topography



High tree canopy for reduced heat island effect and ecological diversity



Retain significant vegetation with open space



Final Masterplan



Unique Place Character



Create a network of distinct walkable neighbourhoods, each with a discernible centre and edge



Celebrate existing landscape features through the urban design, view-lines, public spaces and green and blue infrastructure



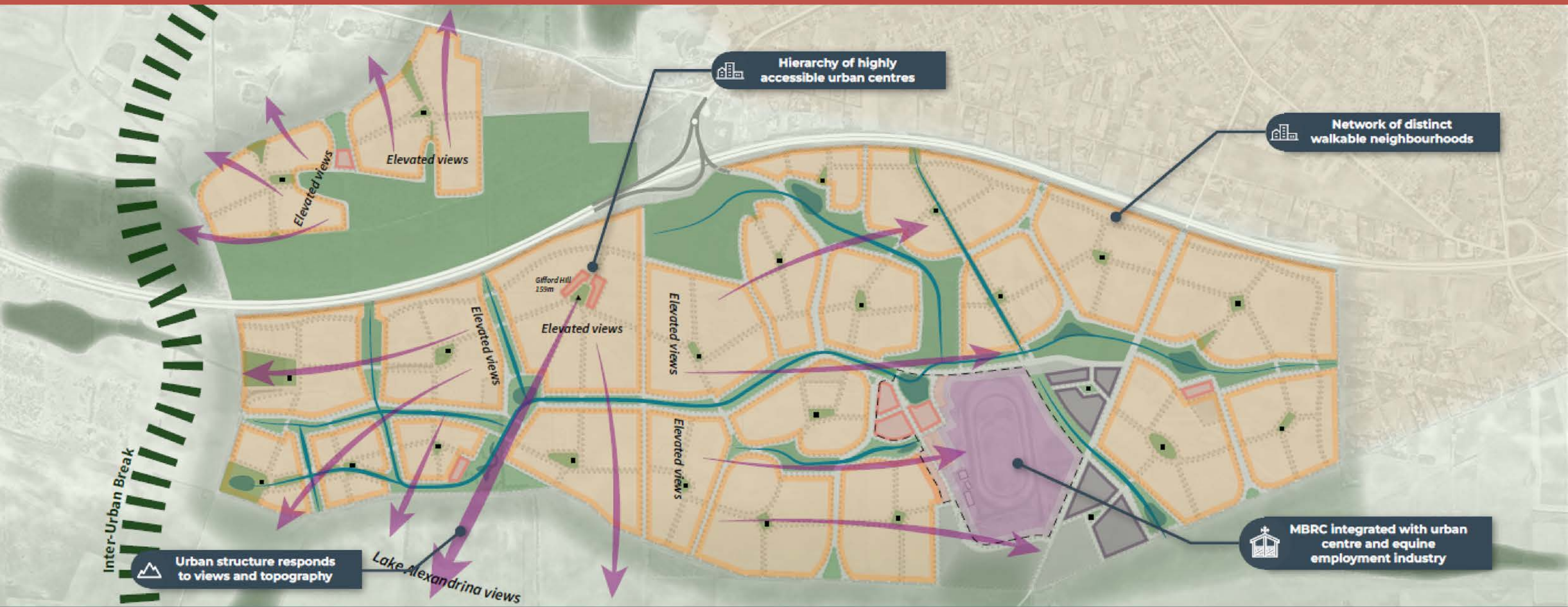
Support and enhance Murray Bridge Racing Club as regional attractor / activator, integrated with the future town centre



Equine employment lands and integrated commercial services



Local employment, entertainment and recreation opportunities



Final Masterplan



Housing Diversity and Aspirational Affordability



Larger lots offering a soft transition to surrounds



Urban living clustered around services and amenity



Hierarchy of centres distributed to enable equitable access to daily needs

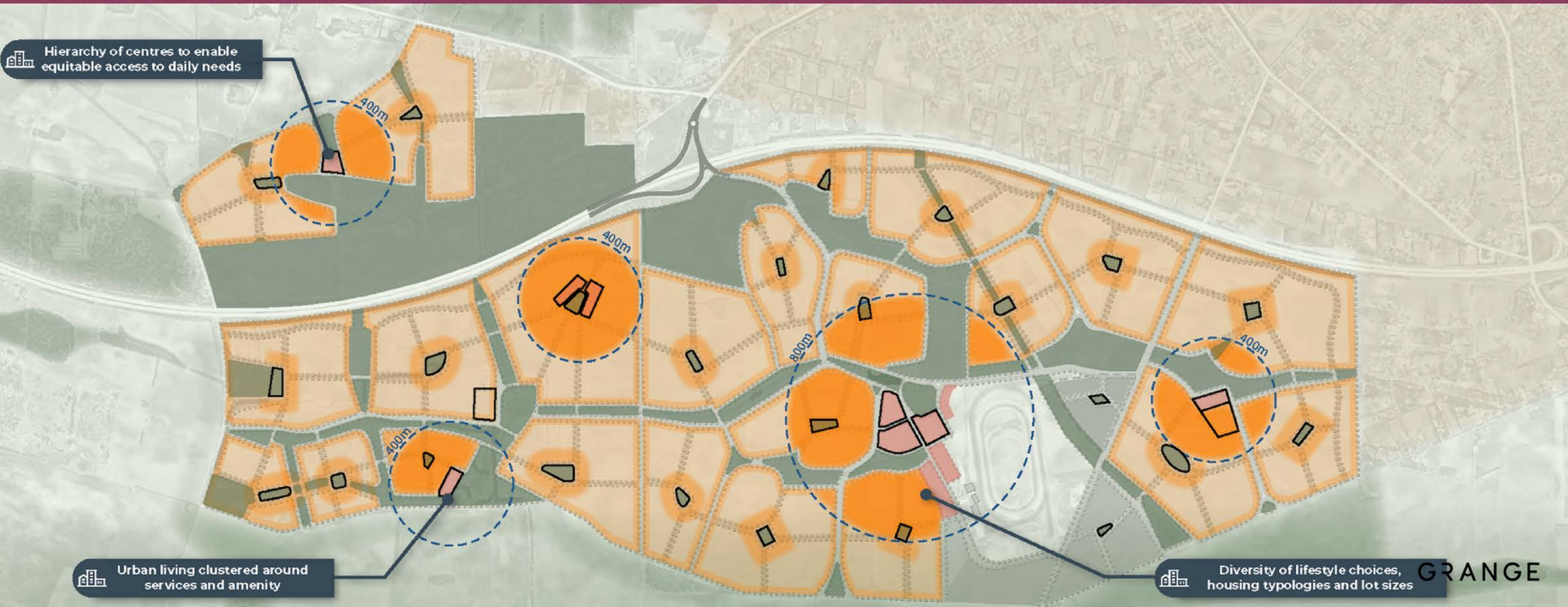


Diversity of lifestyle choices, housing typologies and lot sizes



Affordable housing alternatives for the region

Indicative Staging



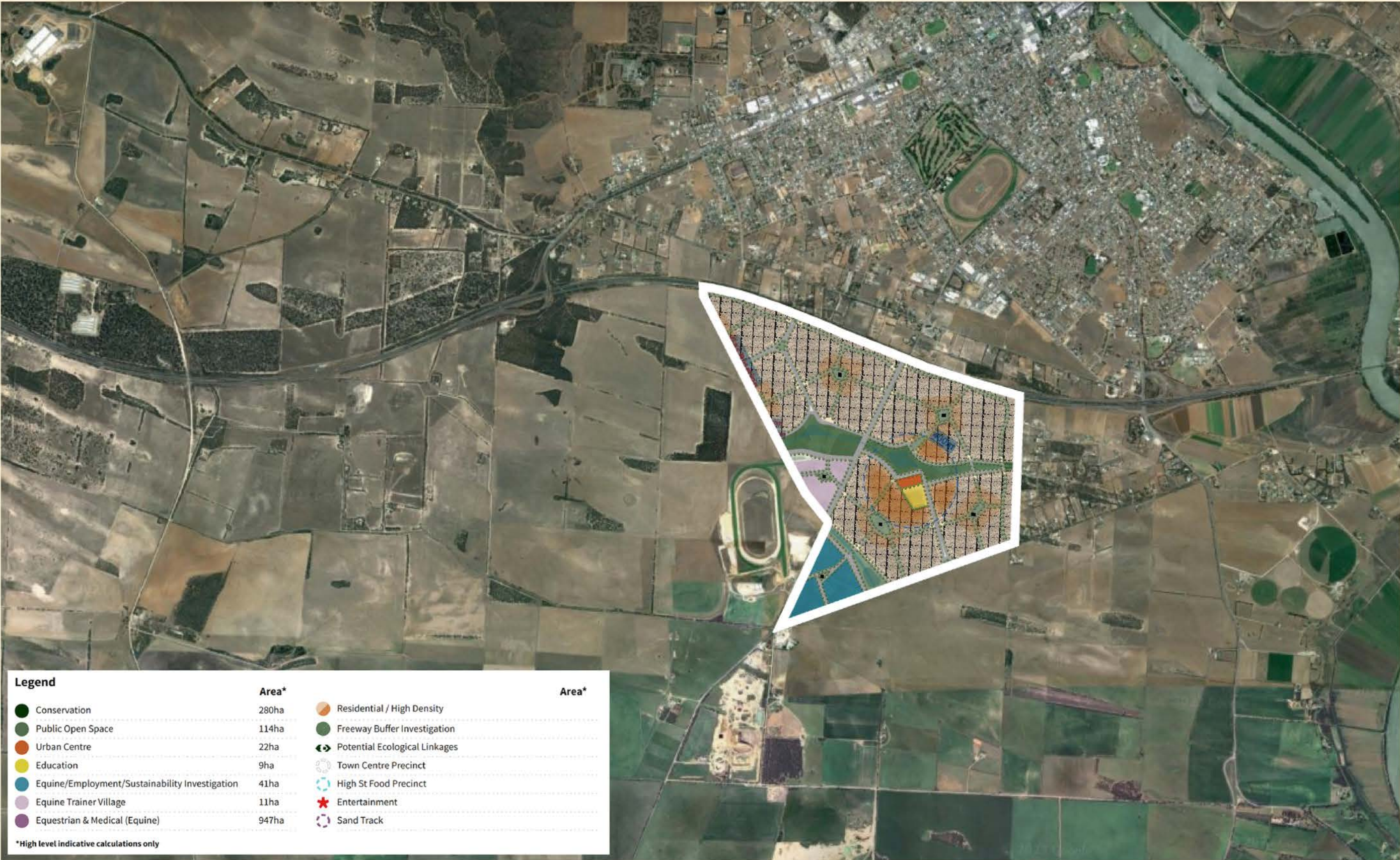
Development Progression

Development Progression



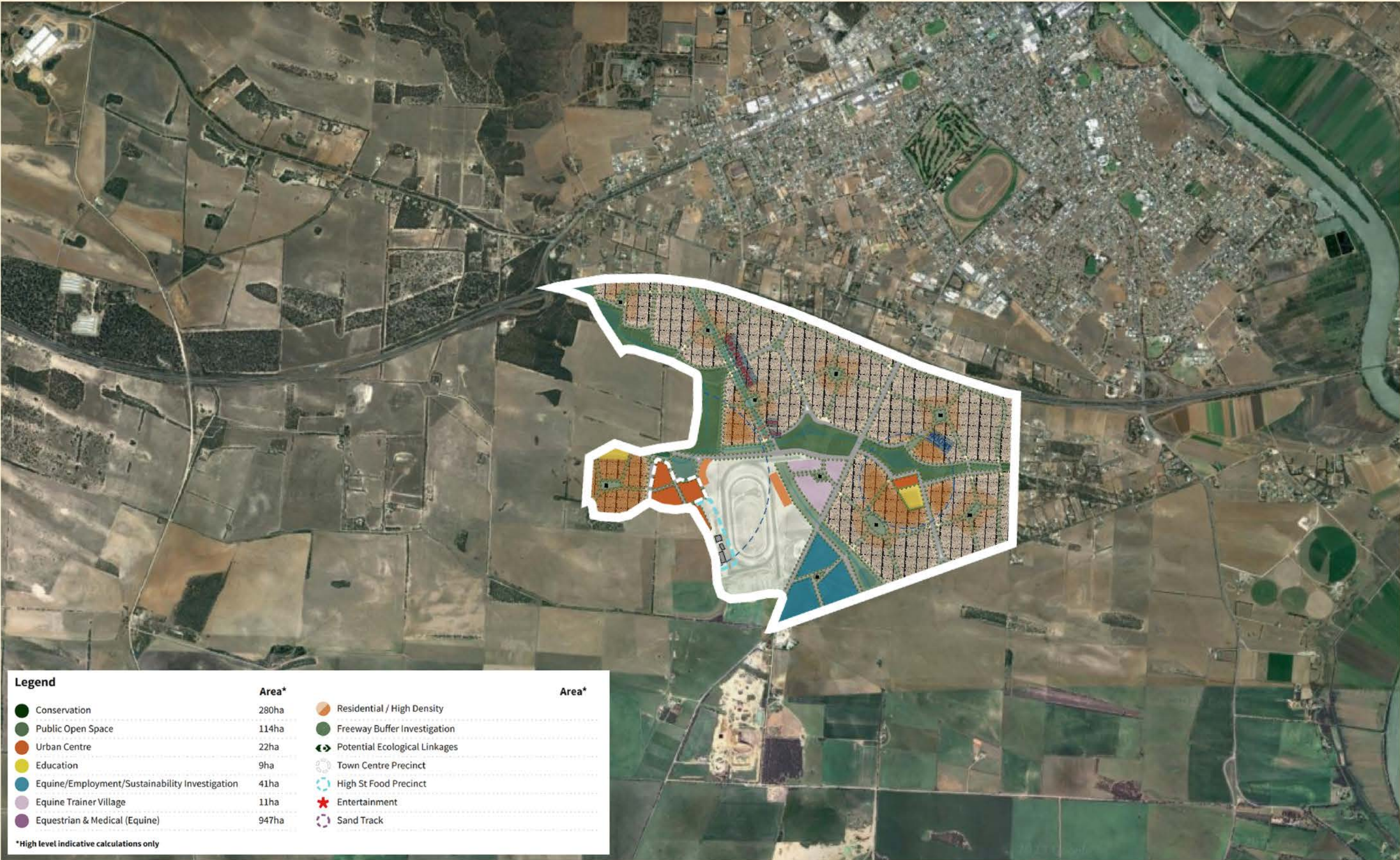
Today

Development Progression



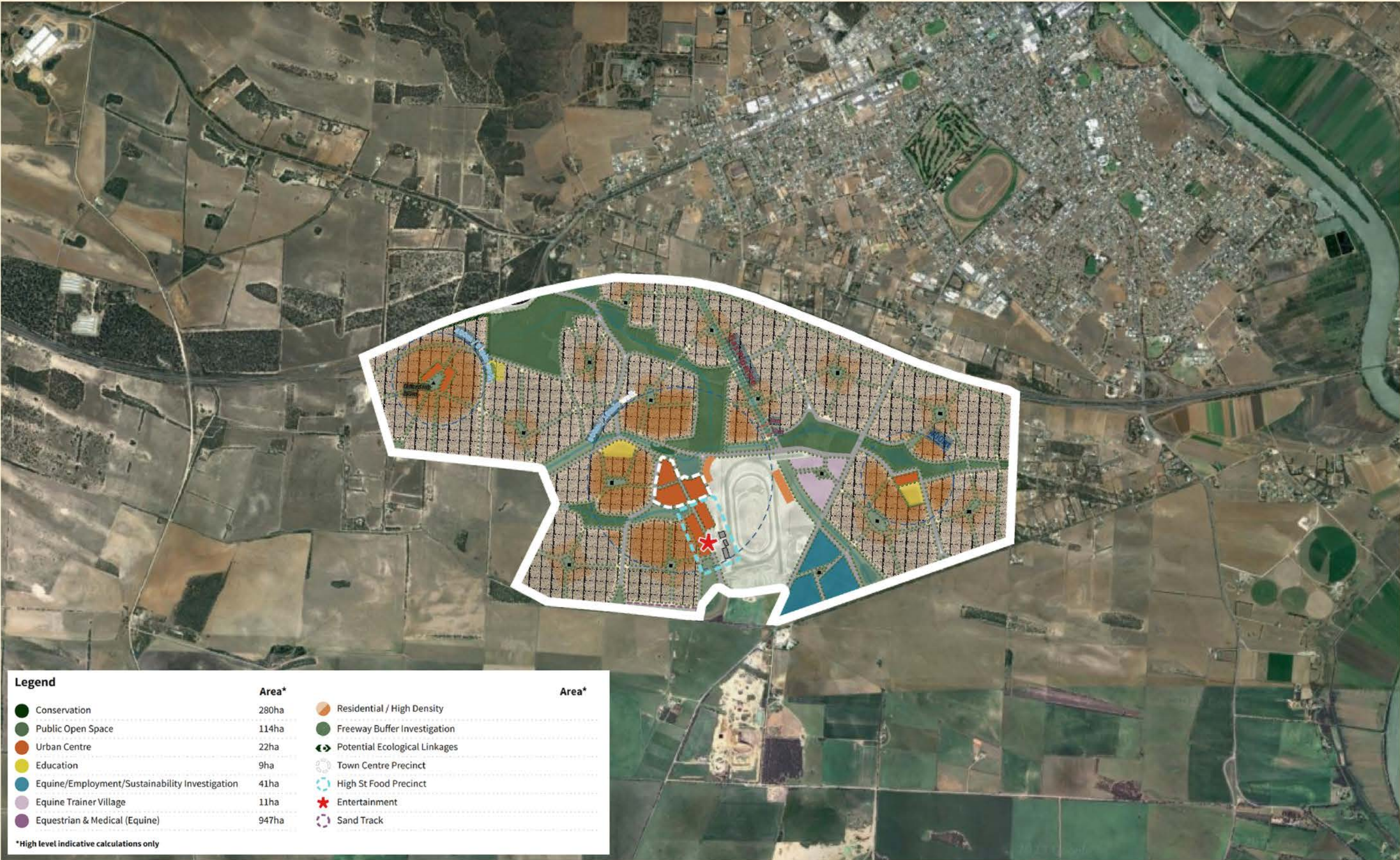
+10 Years

Development Progression



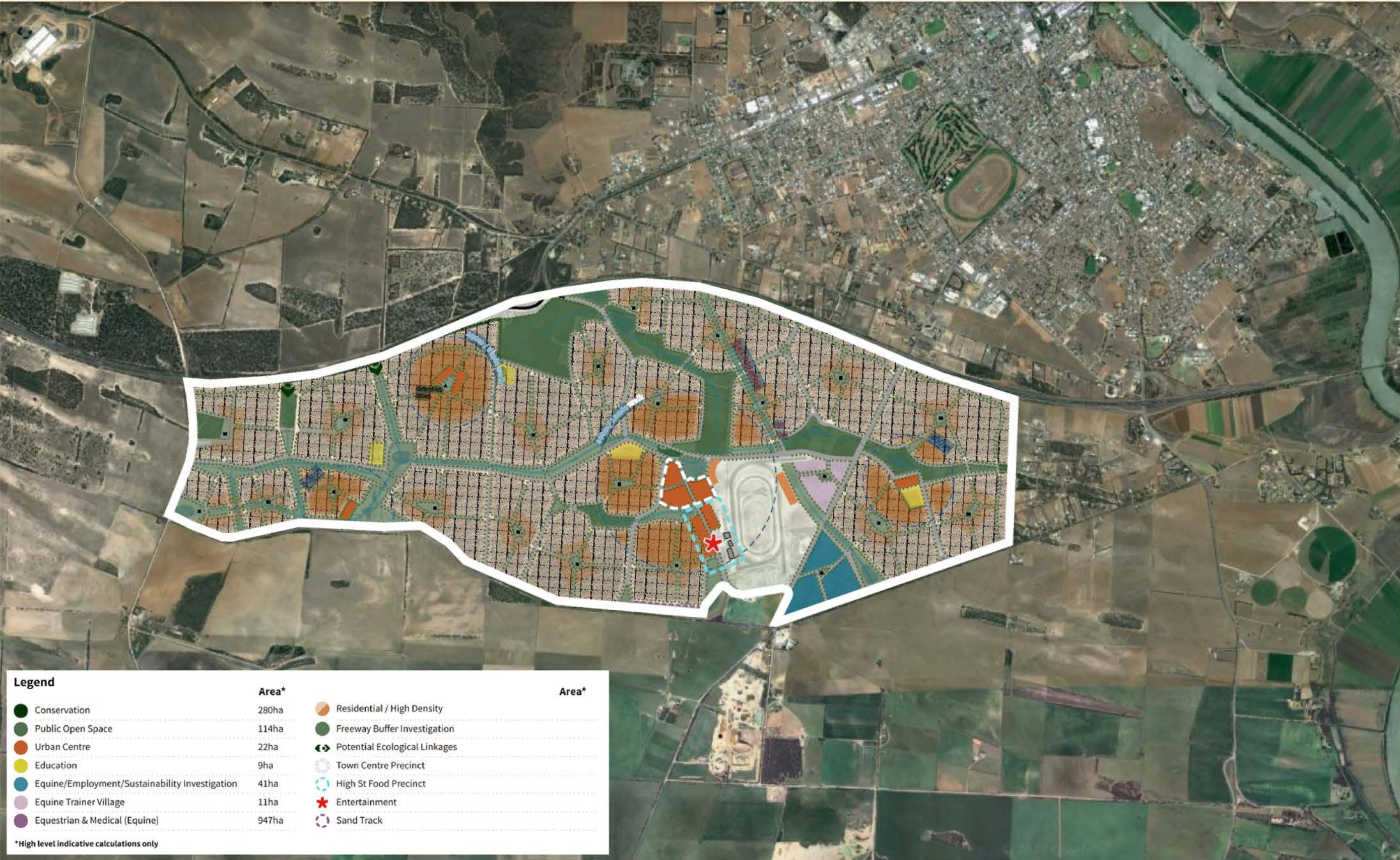
+20 Years

Development Progression



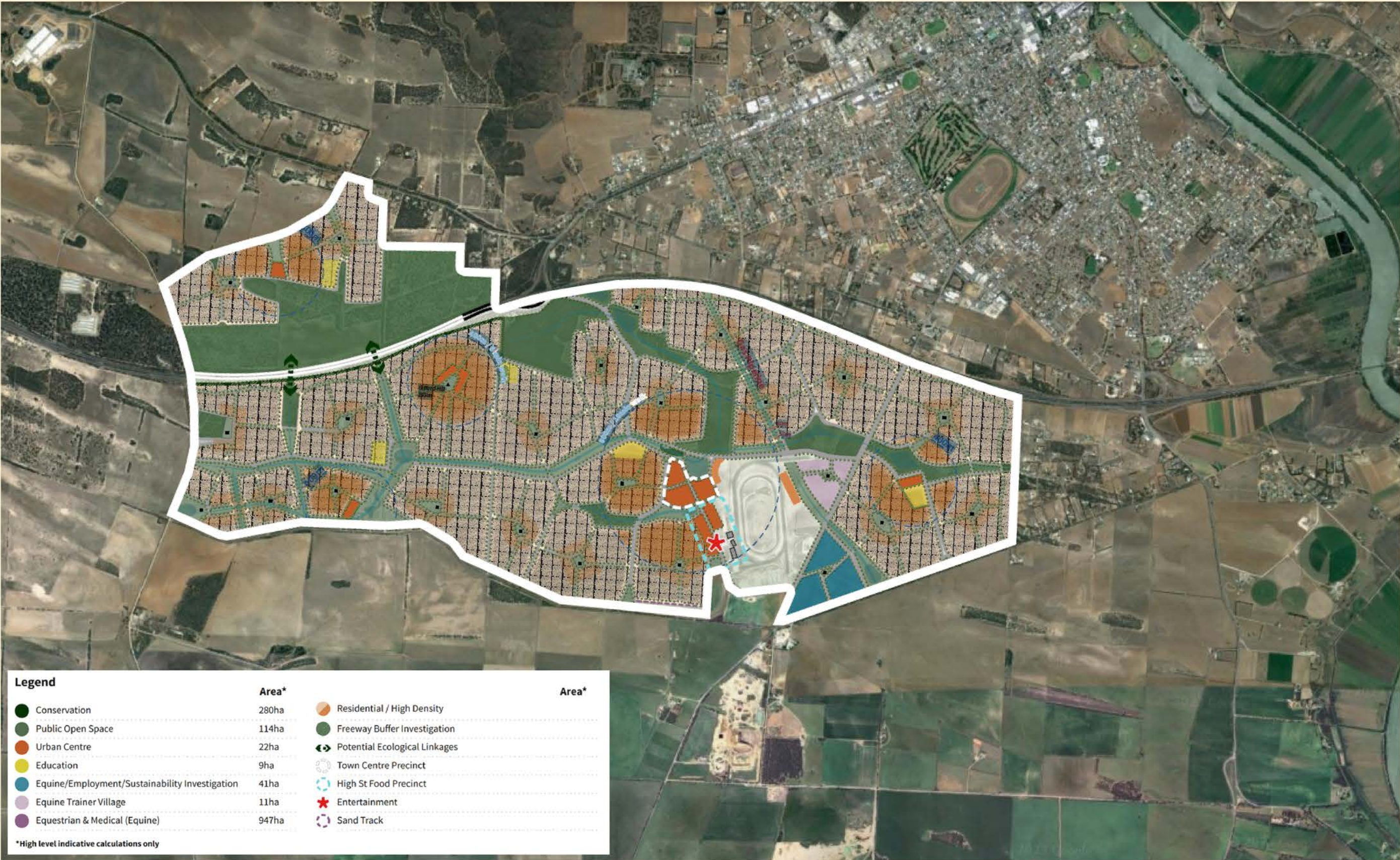
+30 Years

Development Progression



+40 Years

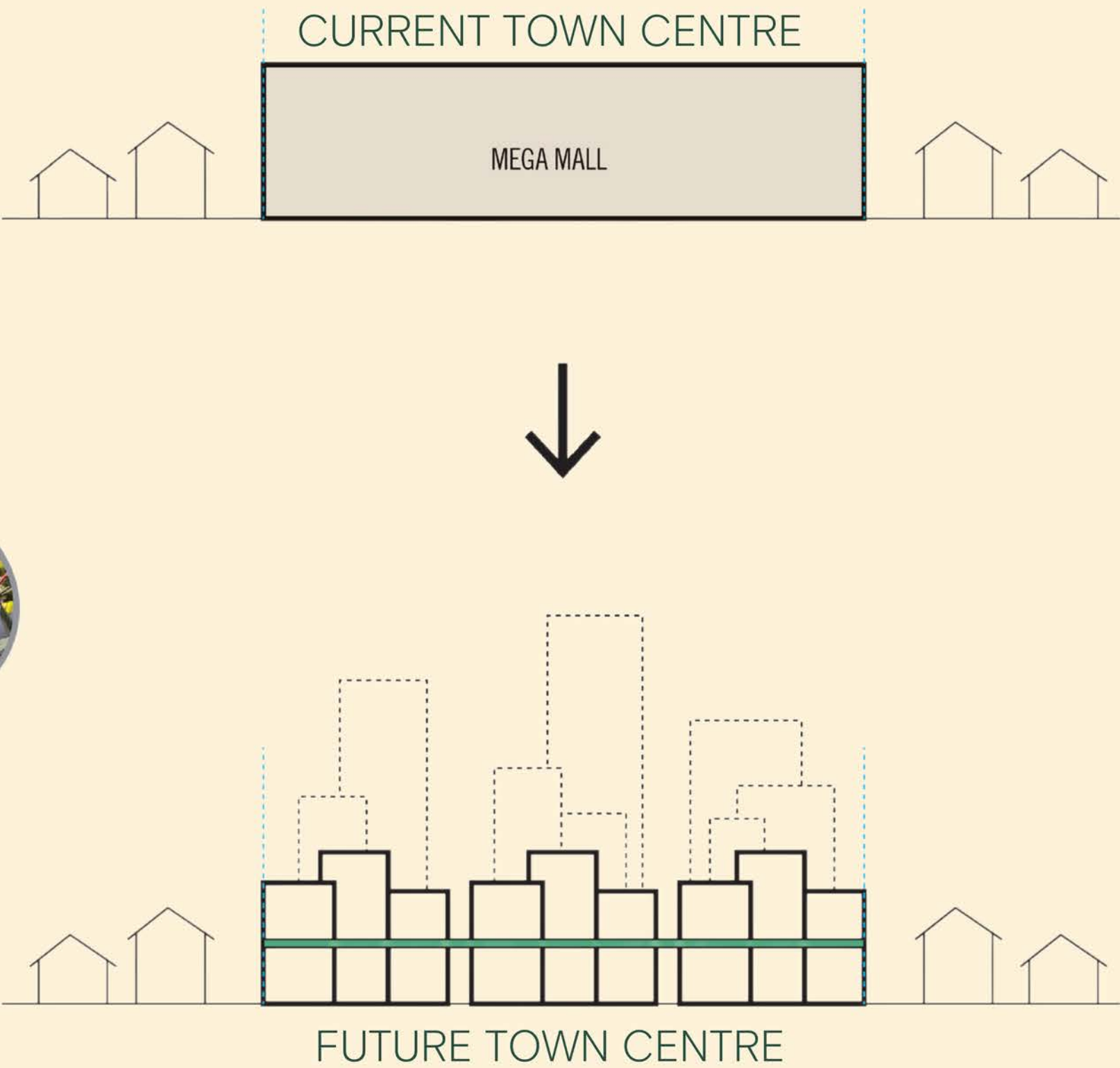
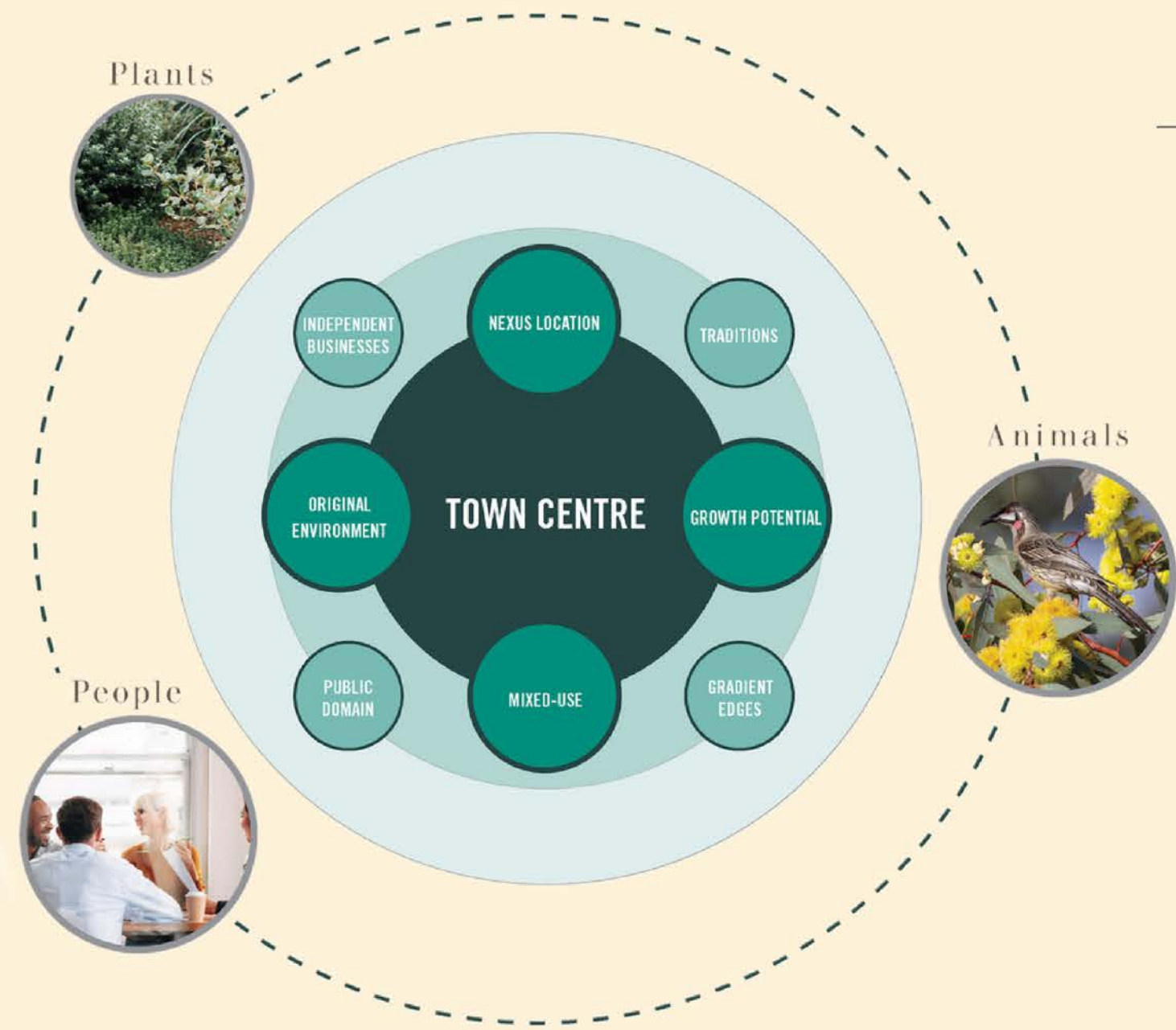
Development Progression



Complete

The Future of **Town Centres**

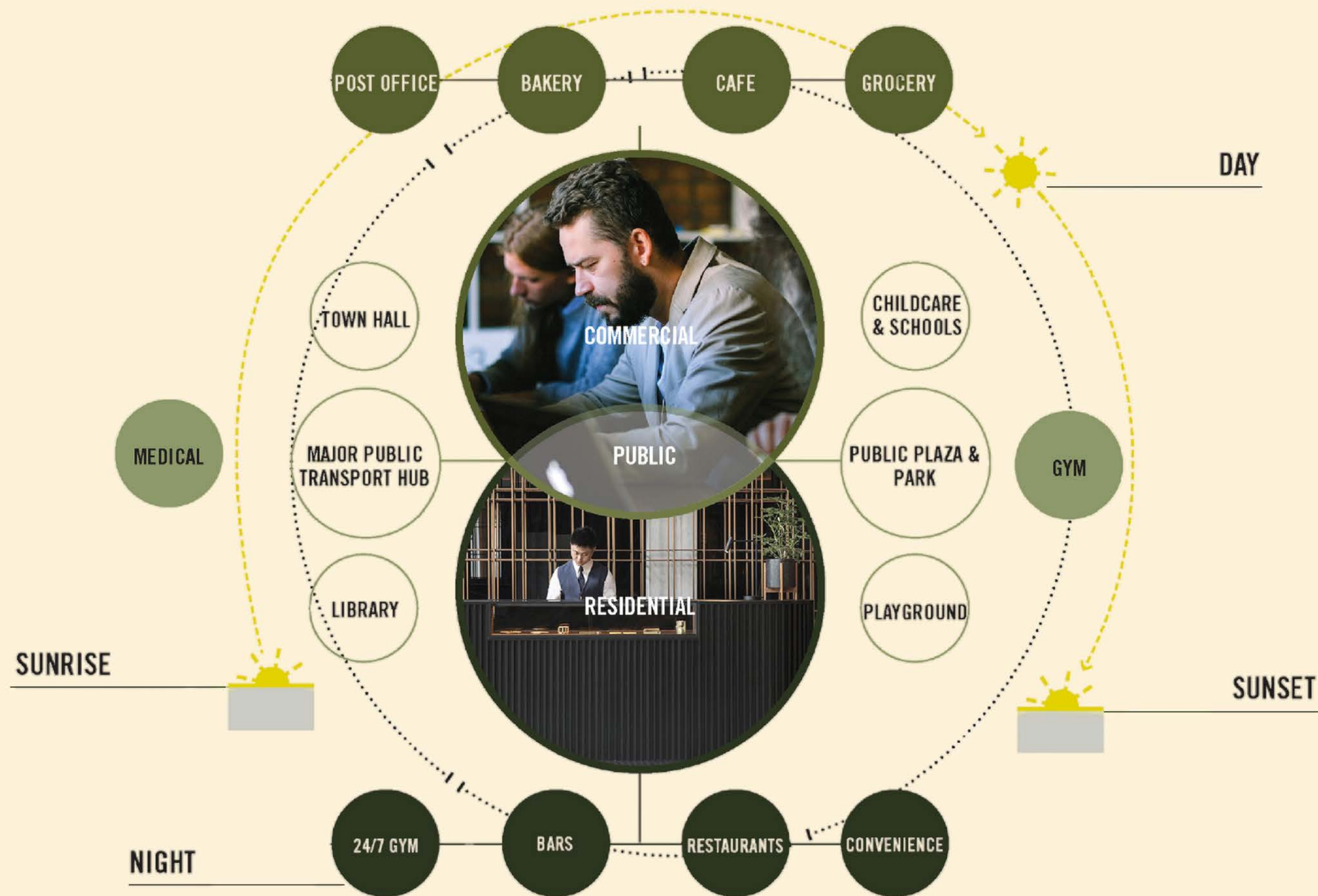
Town Centre



Town Centre



Town Centre



Town Centre

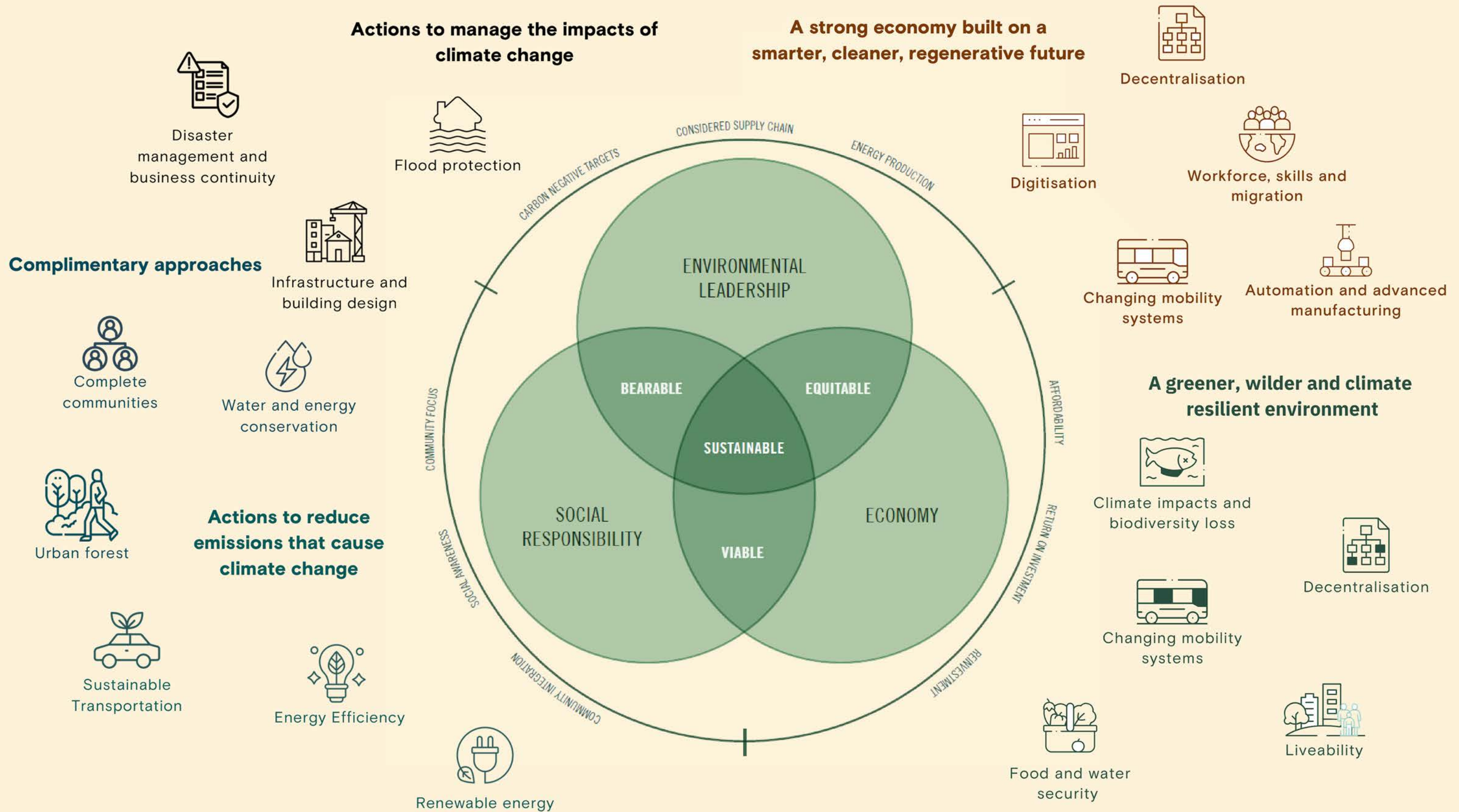


• Artistic Indication Only

GRANGE

Futureproofing Community for **Climate Change**

How Gifford Hill Secures The Community Against Climate Change



The Why

The Carbon Culpurets

1) The Built Environment

2) Agriculture

3) Transport

The Built Environment accounts for 39% of the world's emissions yet is the industry that is doing the least about it.

THE SCIENCE IS CLEAR THE WORLD IS WARMING

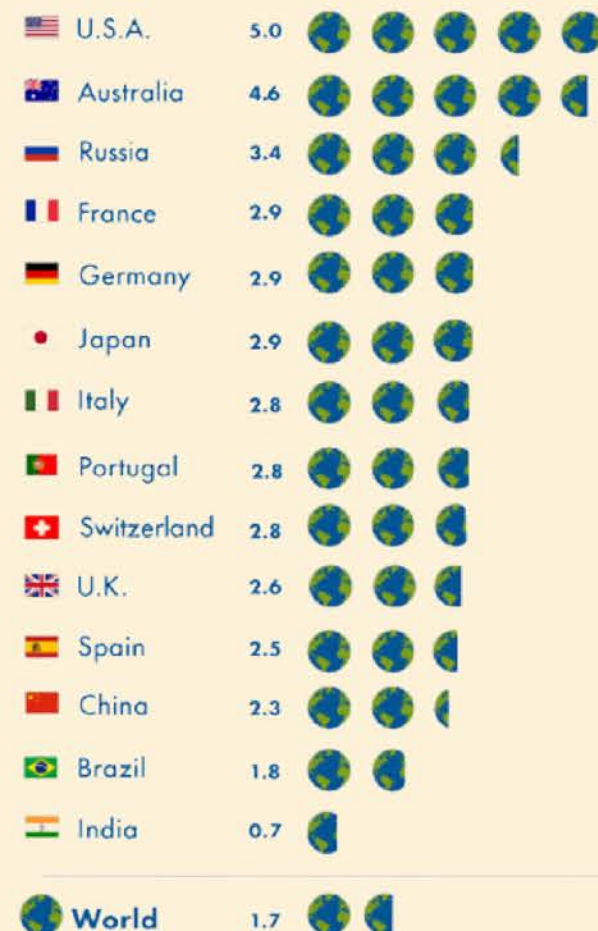
OUR FOSSIL FUELS TOOK OVER
4 BILLION YEARS TO MAKE

AT A RATE OF
1 GRAM A SECOND

WE ARE NOW BURNING THOSE SAME FUELS AT
5,000 TONNES EVERY SECOND

AUSTRALIANS ARE THE
10th HIGHEST
EMITTERS
PER CAPITA IN THE WORLD

IN FACT, IF THE WHOLE WORLD LIVED LIKE
AUSTRALIANS WE WOULD NEED 4.6
EARTHS TO SUSTAIN THE WORLD'S
CURRENT POPULATION



BUILT ENVIRONMENT TRANSPORT AGRICULTURE

50%

BUILDINGS
ACCOUNT FOR 50%
OF OUR ELECTRICITY
USE IN AUSTRALIA

25%

BUILDINGS PRODUCE
ALMOST 25% OF OUR
NATIONAL GREENHOUSE
GAS EMISSIONS

57%

OUR HOMES PRODUCE
57% OF AUSTRALIA'S
TOTAL BUILT
ENVIRONMENT EMISSIONS

8%

CEMENT IS THE SINGLE
BIGGEST INDUSTRIAL CAUSE
OF CARBON POLLUTION,
RESPONSIBLE FOR 8% OF
GLOBAL EMISSIONS

3RD

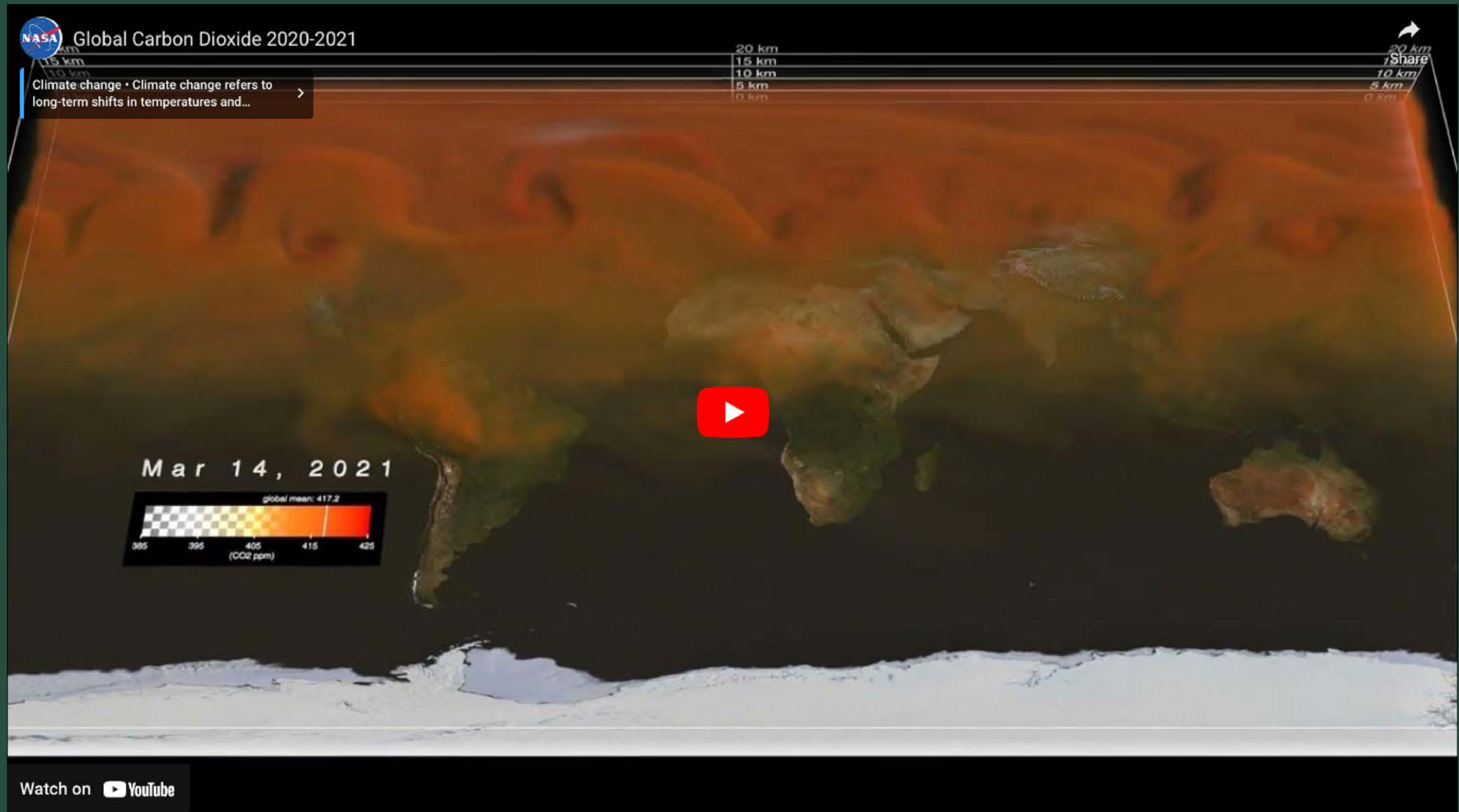
IF CEMENT WERE A
COUNTRY IT WOULD BE THE
WORLD'S THIRD LARGEST
EMITTER

39%

THE BUILT ENVIRONMENT
ACCOUNTS FOR 39% OF
THE WORLD'S
EMISSIONS

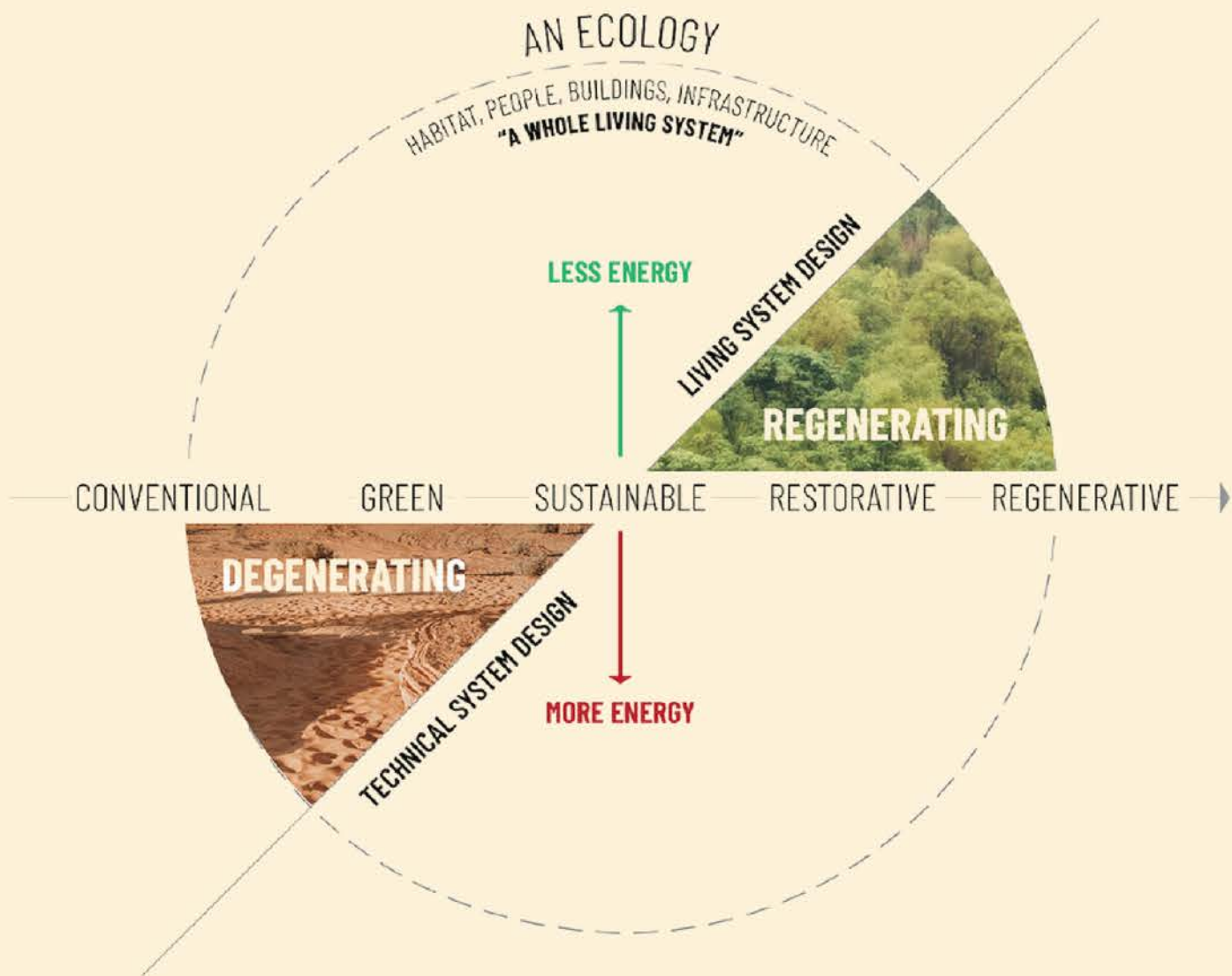
A PLANET IN DISTRESS

The video visualises the quantum of greenhouse gases we are releasing each and every year into the atmosphere. As you will see, for roughly half the year, greenhouse gases are emitted and absorbed by the Earth's oceans and remaining forests. However, during the other half, the planet cannot consume the sheer volume, and the excess is released into the Earth's atmosphere. The result is climate change that has a significant and lag effect. This means that it will be some years before we realise the impact of what has already been released by human activities

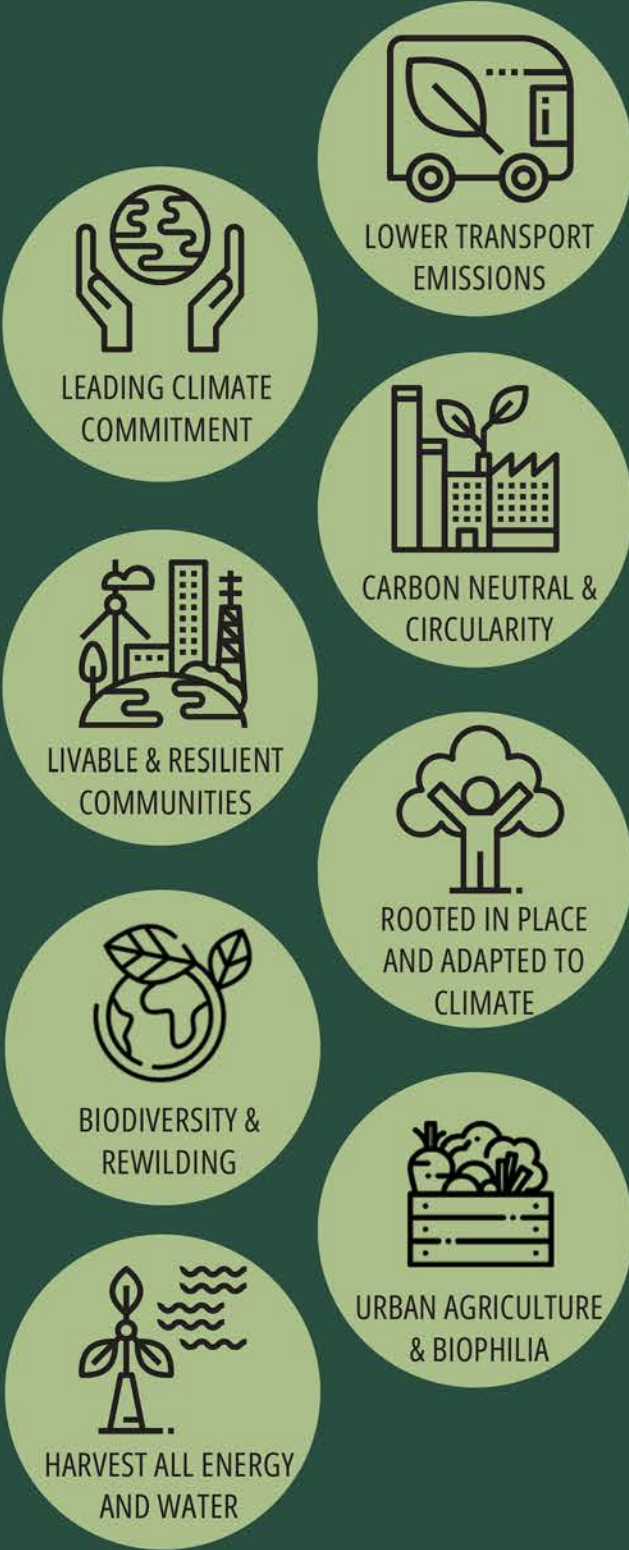


<https://youtu.be/VbOF--Xgs8s?si=dj6OiuORe7dMKI2d>

REGENERATIVE DEVELOPMENT



GIFFORD HILL
WILL PIONEER
AUSTRALIA'S
REGENERATION
OF REGIONAL
CENTRES



The Economic Impact Lifting Murray Bridge

Construction Phase

**+51,280
JOB YEARS**

on a direct and
indirect basis
supported across
the 49-year
construction
phase

Employment supported onsite and in the wider economy via multiplier effects is measured in full-time equivalent FTE job years. **One FTE job year represents one year of full-time employment.**

The capital investment of \$9.51 billion would support approximately **51,280 FTE job years**, comprising **12,250 onsite (or direct) FTE jobs years**, and **39,030 indirect FTE jobs** in the wider economy resulting from supply chain and consumption effects.

This equates to **10,50 FTE jobs per year** (direct and indirect) supported across the 49-year development phase.

Construction Phase

\$7.58 billion in value added to the economy on a direct and indirect basis over the construction phase

Construction Phase Employment and Value Added			
	Direct	Indirect	Total
Employment (job-years)	12,250	39,030	51,280
Value Added (\$M)	\$2,170.6	\$5,406.2	\$7,576.8

*Table sourced from Ethos Urban

Direct employment refers to the business participation opportunities for local construction-related businesses in Murray Bridge, Mount Barker, and Alexandrina.

Businesses in the local region would be well placed to benefit from the construction phase of the proposed development, as indicated by the region’s business and occupational structure.

Indirect jobs would be expected to accrue in a wide geographical area across a broad range of sectors.

Operational Phase

7,210

onsite jobs

supporting an
additional 5,100
indirect jobs
through multiplier
effects on an
ongoing basis

Approximately **2,770 FTE jobs** supported by **retail** and **commercial components**

Approximately **390 FTE jobs** are supported by **schools**.

Approximately **630 FTE jobs** supported by **community** and **medical infrastructure**.

Approximately **3,420 FTE jobs** attributed to **residents working from home (WFH)**, assuming 20% of dwellings support one resident WFH on an FTE basis.

Operational Phase

\$1.67 billion
in value added
to the economy on
a direct and
indirect basis
generated
annually by jobs
supported onsite

The 12,310 total (direct and indirect) ongoing jobs supported by the new community would generate an estimated \$1.67 billion in value added per year

Operational Phase Annual Economic Benefits			
	Direct	Indirect	Total
Employment (FTE)	7,210	5,100	12,310
Value Added (\$M)	\$1,023.6	\$650.1	\$1,673.8

*Table sourced from Ethos Urban

Operational Phase

\$750 million
in retail
spending per
year from
residents at
Murray Bridge to
the local region
and beyond (at
full development)

At full development, the proposed new community is estimated to accommodate some **50,000 residents**, representing an average household size of **2.9 persons**.

Total Retail Spending by Residents at Full Development

Total Annual Retail Expenditure	\$750M
Annual Per Capita Retail Spending (\$ per person)	\$15,000

*Table sourced from Ethos Urban

Over half of this new spending is anticipated to be directed to retailers in new community.

A significant share would also be captured by retailers elsewhere in the local region including Murray Bridge and Mount Barker

Some spending would also flow to higher-order centres in Metropolitan Adelaide as well as online platforms.

Planning **Submission**

Grange Costa Gifford Hill

Grange Development (Grange) and **Costa Property** (Costa), in a joint venture identified as Grange Costa Gifford Hill (GCGH), have recently acquired significant land holdings in the south-west of Murray Bridge, South Australia.

While both companies are relatively new to the South Australian market, both Grange and Costa have impressive project credentials including significant greenfield projects as well as multi-level urban developments in Victoria, Western Australia, Northern Territory. Importantly, both companies have the capital required to deliver on the vision outlined in this submission.

The principal area purchased by GCGH comprises a **462 hectare land holding** known as ‘**Gifford Hill**’ and a **total current holding as of this submission of 909 Hectares**.

Gifford Hill was established via a rezoning in 2010 to accommodate the now relocated and constructed Murray Bridge Racecourse, associated equine facilities (including a proposed Trainers Village), recreational open space, and an activity / retail centre, with the balance of the land assigned to residential purposes. The master planned greenfield site was aimed at the establishment of an expanded Murray Bridge community supported by a diverse range of housing and complimentary services, facilities and open space.

While the racecourse and some of the equine facilities have since been constructed, the balance of the Gifford Hill area remains undeveloped and as such, the opportunities presented by the former rezoning are yet to be fully realised.

In the process of investigating the master planning opportunities of Gifford Hill, GCGH’s have considered the potential of other surrounding land parcels given this land has been identified by the Rural City of Murray Bridge as future growth areas in the Murray Bridge Structure Plan (2012) and is expected to be reflected for consistency in the current Structure Plan (2023-24) and represents a logical, contiguous extension of Gifford Hill and the Murray Bridge township.

Accordingly, this GARP submission speaks to an area identified in the below as the ‘Land of Interest’, being both land in the control of GCGH as well as other key land holdings within the Council’s identified ‘Western Growth Area’ and ‘Southern Growth Area’. For master planning purposes it also includes the existing Murray Bridge Racecourse and associated facilities.

Grange Costa Gifford Hill

GCGH are aware that Council are currently undertaking a review of the Murray Bridge Structure Plan (and have engaged with Council in relation to this) however at the time of preparing this submission, an updated Structure Plan is yet to be released.

With the current Structure Plan over 10 years old, GCGH are very supportive of the current Council investigations and, as key local property owner, have demonstrated a commitment to working proactively with Council to unlock the potential of the Murray Bridge region.

To assist with recent discussions and translate both the identified Growth Areas within the current Structure Plan as well as GCGH's project intentions, the following high level consolidated Structure Plan image (Figure 1-2) was prepared by GCGH and seeks to reflect at a cadastre level:

- The 2012 Murray Bridge Structure Plan growth areas;
- GCGH's intentions for a revised masterplan for Gifford Hill;
- The Council lead 'Murray Bridge Residential Growth Areas Code Amendment' comprising two small areas of Rural Living Zone and a larger portion of Deferred Urban Zoned land immediately west of the Murray Bridge township to be rezoned to Master Planning Neighbourhood.

The recent land acquisitions by GCGH represent a key milestone for the Murray Bridge region and the consortium have advanced site master planning and associated investigations in order to progress development of the land holding in the short term.

Concurrently GCGH have established a productive and respectful relationship with the Rural City of Murray Bridge in relation to the city's growth strategy to which Council have been receptive.

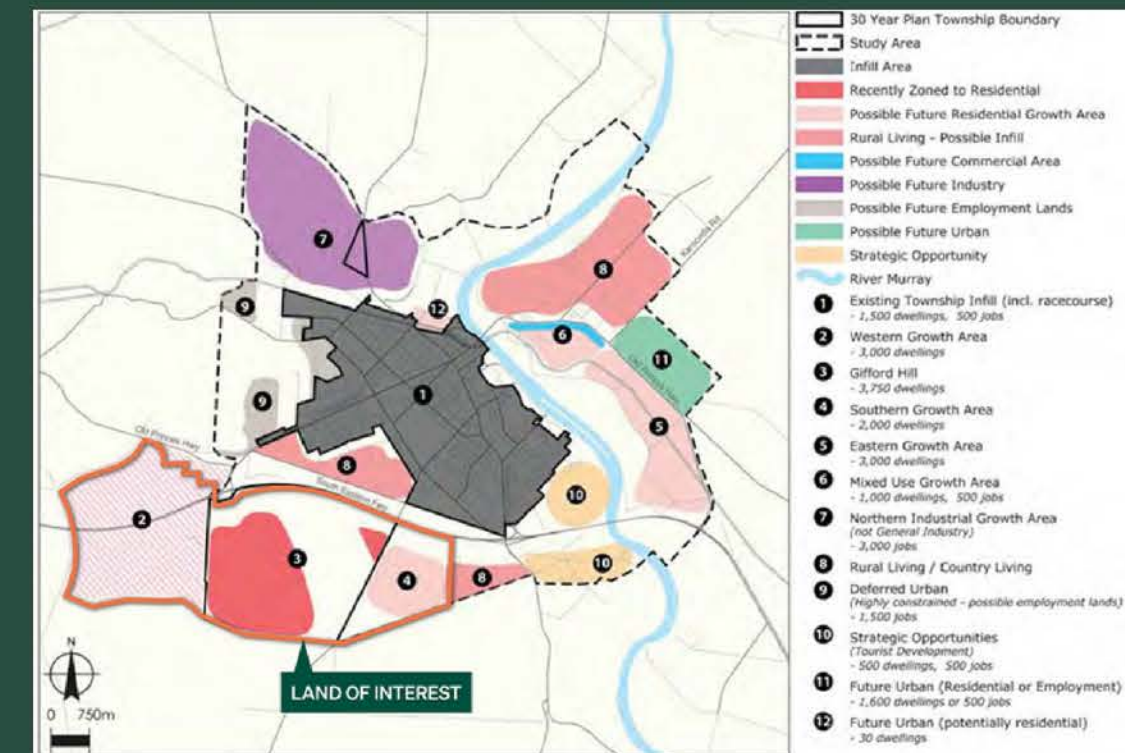


Figure 1-1 Murray Bridge Structure Plan (2012) with GCGH Land of Interest Identified

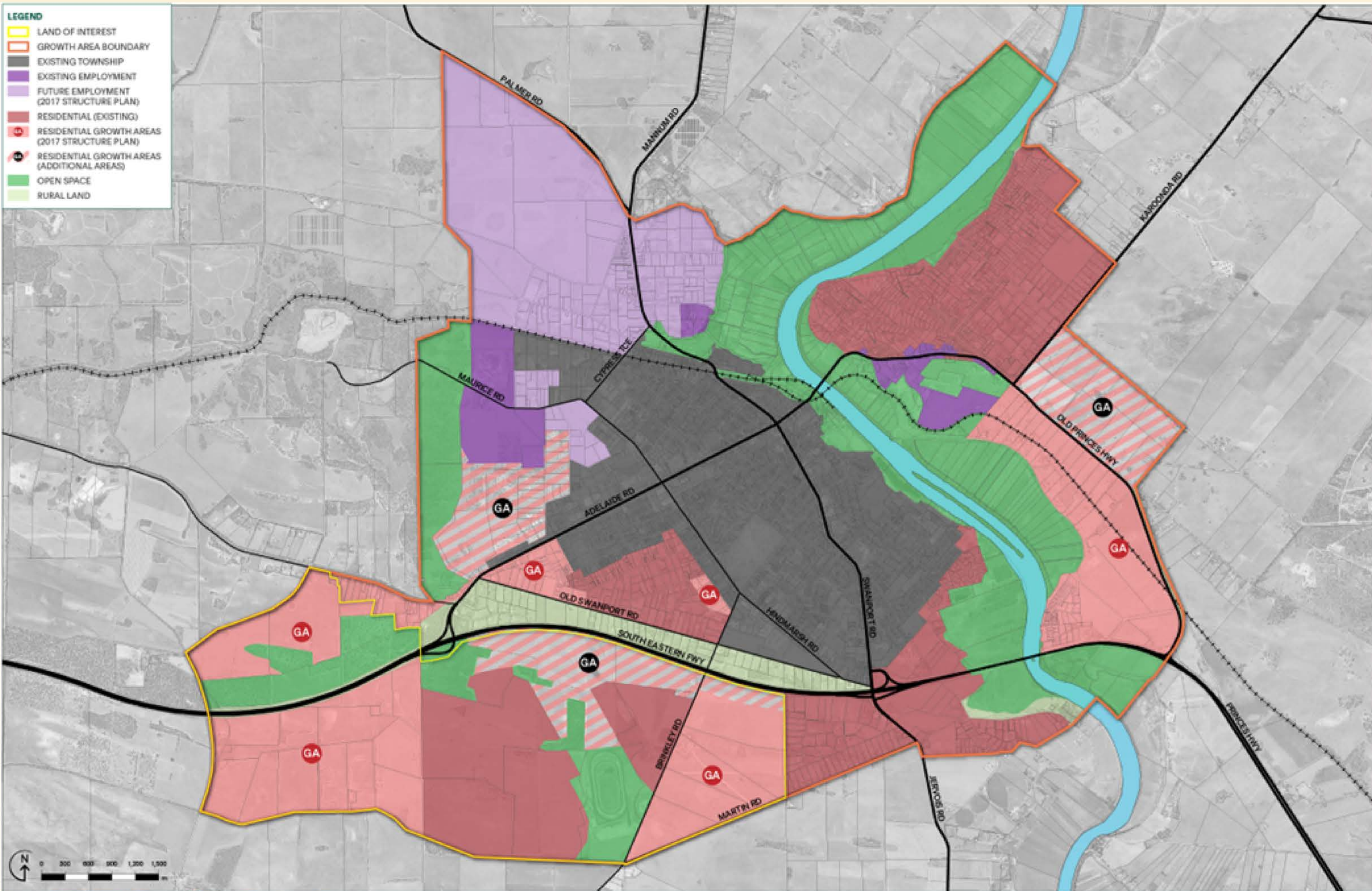


Figure 1-2 GCGH Murray Bridge Structure Plan

Figure 2-1 Land of Interest

Masterplan Concept

Renowned Urban Designer Globally, Mike Day of Hatch RobertsDay was commissioned to Forge Gifford Hill's Future: A Masterplan Rooted in Polycentric Urbanism and Living Locally Principles

To investigate the potential of the Gifford Hill land and its vicinity, GCGH enlisted the services of Hatch RobertsDay to reassess the Gifford Hill land and incorporate this updated analysis into the development of a Masterplan for the Land of Interest.

The design team has 'ground-truthed' their Vision and Concept Plan by conducting site visits, analysing the topography, current land uses, and other key features of the land. They have also received input on services and infrastructure, transport, planning, environmental factors, economic development, and other relevant strategic considerations.

It is recognised that the master planning undertaken extends beyond the land controlled by GCGH. However, this approach has been adopted to consider which growth opportunities would be most beneficial for the Murray Bridge region, regardless of ownership as a whole of precinct planning approach, which is best practice. It also aims to determine which land can provide a logical and efficient service enhancement and connectivity to Gifford Hill and the Murray Bridge township.

The expanded Gifford Hill Concept has been developed with a polycentric urban form that revolves around 5 key pillars. These pillars are directly aligned with the Living Locally Principles expressed in the GARP, as shown on the left.

Gifford Hill Key Masterplan Pillars	Commission's Living Locally Principle
Healthy Connected Communities	Walkability and active travel
	Public transport options
Sustainable Living	Everyday shopping and services
	Safer streets and spaces
	Local job options
Environmental Regeneration	Open space and recreation
Unique Place Character	Sense of community
	Arts, culture and experiences
Housing and Aspirational Affordability	Affordable Living
	Housing choices at all stages of life

Land Suitability for Growth

Gifford Hill's Expansion is Set to Provide Homes for 5% of Greater Adelaide's Future Population Surge

The Concept Plan is based on the current Gifford Hill Master Planned Neighbourhood project area and incorporates the contiguous growth areas to the east and west. This precinct approach would be continuous and logical, providing ample opportunities for residential, community, and service center development in the short, medium and long term.

Projections indicate that the population of Greater Adelaide may increase by as much as 670,000 individuals over the next three decades, representing a 46% rise compared to the current population. To accommodate its residents, Greater Adelaide will require approximately 300,000 homes within the next 30 years.

Gifford Hill has the potential to meet approximately 5% of the population demand by providing 4% of the necessary housing within a 30-year timeframe.

The planned progression of the project, starting from the area nearest to Murray Bridge and moving westward, demonstrates a practical and progressive approach to its development over a span of 49 years. This direction is chosen based on the availability and access of existing services.

The delivery of the Gifford Hill project will directly contribute to the Government's goal of transforming Murray Bridge into the second city of Greater Adelaide.

This will help manage the metropolitan region's growth by providing more affordable housing options while maintaining the advantages of a highly livable urban township. As stated in the GARP, planned growth in satellite cities can take advantage of existing physical, social, and economic infrastructure and allow for strategic investments to support a growing community over time. The Gifford Hill project aligns with these intentions for planned growth.

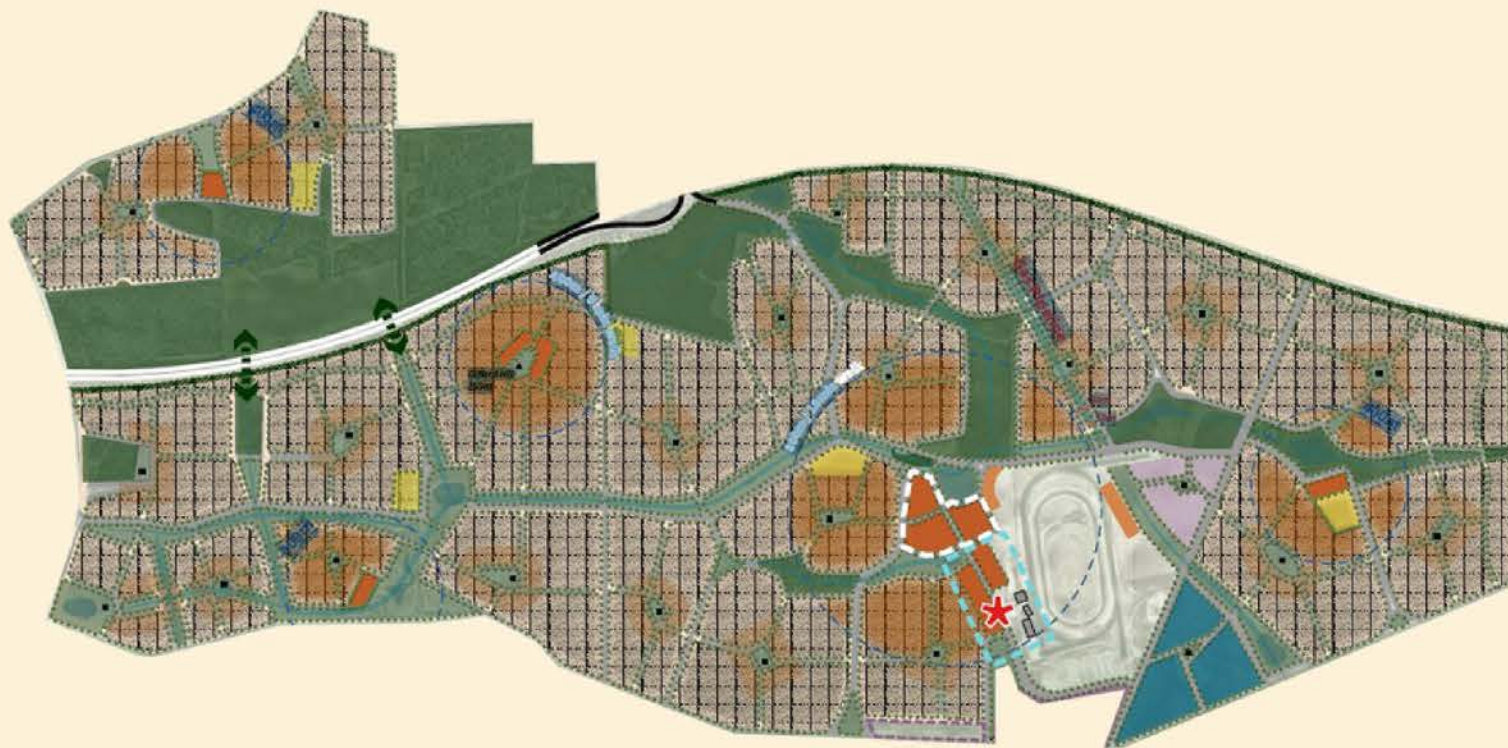
Masterplan Key Features

Land Area: Approximately 1,472.5 hectares

Residents: Approximately 50,000 residents

Dwellings: Approximately 17,800 dwellings, including 13,750 detached houses and 4,050 Medium-Density Dwellings

Open Space: Approximately 268 hectares of conservation land and a further 110 hectares of functional public open space



Commercial: Approximately 97,000m² of retail and commercial floorspace, across a range of activity centres and commercial areas.

Community Infrastructure: Anticipates a range of regional, district, and local facilities, including: Performing arts centre, Aquatic leisure centre and Indoor recreation stadium, Libraries, Neighbourhood community hubs, Neighbourhood indoor recreation facilities (up to two) and Sporting fields

Medical: Potential exists for a medium-sized hospital (i.e approx 120 beds).

Conservation and Natural Spaces

Gifford Hill's Revised Concept Plan Balances Residential Development with Preservation of Recreational and Equine Activities

Established areas of vegetation and habitat have been mapped in the concept plan and subsequently protected, while new vegetation corridors have been created to create interconnected webs of open space for passive and active recreation, as well as access to water sensitive urban design and the creation of biophilic-centered habitats and conservation corridors are proposed.

The revised concept plan strategically reallocates the current "recreational zone" for a mix of land uses within the development while maintaining a commitment to community recreation needs. Within the scope of the broader masterplan, residential areas will be integrated, and a dedicated portion of the southern end will continue to support horse-related activities and a racetrack. This plan thoughtfully redistributes passive and active open spaces, optimising the use of the substantial 378 hectares of green space to meet the evolving needs of the community throughout the precinct.

This approach is adopted based on the following:

- Established areas of vegetation and habitat have been mapped in the concept plan and subsequently protected, while new vegetation corridors have been created to create interconnected webs of open space for passive and active recreation, as well as access to water. Sensitive urban design and the creation of biophilic-centered habitats and conservation corridors are proposed. Design principles.
- It is acknowledged that the concept plan envisages converting a significant portion of the current "recreational zone" to residential use, with the southern end of this zone being retained for horse-related activities and a racetrack. This approach is adopted based on the following:
 - The existing Recreation Zone land is not all required for equine activities, particularly at the northern end where the established equine activities are now concentrated in the south.
 - The cleared (former agricultural) land in this zone, which covers a large area, is essentially unusable in its current state. Additionally, it is too expansive to be realistically transformed into functional recreational space, excluding the Racing club, equine activities, and vegetated area, which measures approximately 125 hectares.
 - It is preferable to have the chance to create well-designed and functional open space corridors and connected recreational facilities throughout the project area rather than having a large unproductive area.
 - The current gas pipeline can be appropriately accommodated by ensuring sufficient distance on both sides to effectively manage the risk.

Sustainable Connected Communities

Masterplan Envisions Climate-Smart, Connected Living Spaces for Gifford Hill, Boosting Local Economy and Digital Workforce

The masterplan incorporates climate resilience, and these initiatives are based on urban design principles. It includes a network of walkable neighborhoods that prioritise local living. These neighborhoods consist of various types of residential housing, including detached and semi-detached dwellings, as well as higher density options like townhouses. These neighborhoods are connected by linear green spaces.

The Concept Plan includes separate and easily reachable local centers, along with a new F&B-dominated Mainstreet (located to the west of the Racecourse), which will offer access to everyday goods and services (as well as job opportunities).

However, larger purchases and regional services will still be obtained in Murray Bridge town center. The plan also includes a suitable arrangement of educational facilities and healthcare services.

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and healthcare services.

The design approach enables the evolving workforce's adoption of permanent and hybrid Work from Home arrangements. It achieves this by providing access to best-in-class digital infrastructure (including a fiber loop to the home) and convenient local connections and services in a town center that can support high-bandwidth industries like streaming sports and medical imagery.

The project would provide direct support and utilisation of the \$100M Murray Bridge Racing Club and its associated facilities. Currently, these facilities are isolated from Murray Bridge and situated in an unused paddock, essentially it could be classified in its current form as a stranded asset. In the initial stages of the project, activities would be focused around the Club to ensure its integration into the community. Furthermore, on a larger scale, the project aims to create an authentic entertainment precinct that will enhance and supplement the racing experience at Morphettville. This facility is facing increasing challenges due to surrounding development and conflicts over land use.

Why Expand Gifford Hill Into a contiguous Precinct?

Benefits of the Southern Spine

The current distribution of greenfield land supply in Greater Adelaide is heavily concentrated towards the Outer North. This trend is creating an imbalance with dwindling availability in the Outer South, potentially restricting housing diversity, supply, and affordability.

An examination of growth patterns reveals a disproportionate expansion towards the north. This uneven development trajectory risks an imbalanced urban structure, with associated complications in traffic flow and commuting patterns.

Increased travel times and heightened emissions could be the byproduct, potentially affecting the city's overall productivity and environmental goals

Without the distribution of growth evenly Adelaide risks a departure from good urban design fundamentals in creating a city that represents a “pear” rather than a circle centered on accessibility, choice and affordability.

Infrastructure also comes into play as a significant consideration for the State. The northern region is grappling with challenges regarding essential services—potable water and wastewater treatment. These existing challenges are at risk of being exacerbated by the projected escalation in housing developments. **Growth Areas that are not adjacent to existing infrastructure also risk putting significant funding pressure on the public purse to fund the infrastructure gaps, Murray Bridge/Gifford Hill are already serviceable.**

Agricultural considerations are equally pressing. The northern tract serves as Adelaide’s agrarian hub. Intensifying urban development in this sector heightens the risk of land-use disputes and complicates the logistics of agricultural transportation and operations.

When growth options in the south and east are constrained, particularly around Mount Barker, alternative locations must be evaluated for potential urban development.

Gifford Hill, located on the periphery of Murray Bridge, presents such an opportunity. Murray Bridge has already been identified as a 'Growth Investigation Area,' signaling its potential as a future satellite city.

The proposed expansion at Gifford Hill is not merely gradual but a strategic extension. It leverages the adjacency to existing urban infrastructure, potentially easing the integration of new developments into the city’s fabric.

The proposed new growth boundary encapsulating the Gifford Hill area can be viewed as a proactive measure to foster balanced development. This approach supports an evenly distributed urban expansion that mitigates the risks associated with overburdening any one region, particularly the overstretched northern corridor.

The suggested new growth boundary, as represented by the Land of Interest, represents a commonsense and contiguous extension to the established urban growth area of Murray Bridge, unlocking additional land to support an expanded city.

Why Expand Gifford Hill?

Accessibility

Gifford Hill is highly accessible in term of its:

- Connectivity to Murray Bridge town centre (approx. 5km);
- Commuting accessibility to/from Adelaide (approx. 1hr drive);
- Location adjacent a major freight route and interstate train line, recognised in the GARP as the major 'eastern spine' and
- **Proximity within the Golden Triangle incorporating the proposed Employment Growth Investigation Area identified around Callington (approx. 7km point to point to Gifford Hill and only 4.7km to the existing Strategic Employment zoned land in Monarto South) as well as the proposed Employment area expansion to the north of the Murray Bridge Township which is only 3.7km from Gifford Hill. (See Page 12)**

Supporting Employment

In relation to this last point, companies such as Thomas Food International and other key manufacturing and related businesses are experiencing notable staffing challenges, exacerbated by an acute shortage of local housing combined with **Murray Bridge experiencing the highest increase in rent prices for a major town in Australia (with average increases at almost 70%) as of June 2022.**

The GARP recognises the employment growth opportunities along the South-eastern freeway to support the growing Murray Bridge and Mount Barker communities and identifies significant employment growth opportunities which leverage off existing business growth in the region related to freight, logistics, distribution, manufacturing, livestock agriculture, and the meat industry as well as the significant downstream service industries that operate from these core industries. The area is well suited to these industries and these new and expanding business employees will require local and accessible housing, which Gifford Hill can offer.

An Uncumbered Location

Gifford Hill's masterplan is a testament to thoughtful urban expansion, designed to minimise impact on the broader agricultural landscape. It is ideally situated away from environmentally sensitive zones and set strategically to mitigate bushfire and flood risks.

This foresight in planning supports the transformation of a select, confined area into a vibrant community space, while simultaneously acting as a steward for the vast stretches of agricultural land that define the region's character.

The inclusion of green buffers and the careful integration of infrastructure, such as the gas pipeline, ensures that Gifford Hill's growth is a model for sustainable and respectful development.

Gifford Hill is highly suited as a growth area in so far as it is:

- Well separated from important environmental areas such as the Murray River and associated water protection areas
- Outside of high bushfire risk areas
- On land which is not subject to flood risk and is situated over 2.5 km away from the 1956 flood level
- On land which does not contain any heritage listed properties
- Able to be designed to ensure the protection of important vegetation including the valuable 'State Significant Landscape Protection Overlay' vegetation which provides an important buffer along the freeway.
- Does not compromise the 'Inter-urban break' immediately west of the expanded Gifford Hill project, facilitating connectivity with Monarto and important vegetated areas, and retaining a physical separation from other urban areas
- Can accommodate sensitive land uses a sufficient distance from Council's waste transfer facility to the south in Brinkley
- Will not compromise valuable agricultural opportunities being land that is not identified as a Primary Production Priority area
- Able to appropriately incorporate the existing gas pipeline, with suitable clearance either side and the potential for the surface level to function as part of the open space linkages.

Expanding on this last point, it is important to note that the inclusion of the Gas and Liquid Petroleum Pipelines Overlay (incorporated over the land when the Planning and Design Code was introduced in 2021) now provides a clear set of planning parameters with respect to development in proximity to the Gas Pipeline infrastructure, and as such, development may now be contemplated in proximity to the Pipeline (and in some cases, within the Overlay area) where certain criteria are met. In this context we also note that the future granting of a Planning Consent for a land division and the consequential change in land use around the pipeline would ultimately trigger the requirement for a 'Safety Management Study' to be undertaken by the licensee of the pipeline pursuant to the Petroleum and Geothermal Energy Act, 2000. These measures, both protect and facilitate development opportunities in proximity to the pipeline and were unlikely to have been fully appreciated at the time of the original 2010 rezoning.

In considering the Commissions 'Principles for Identifying Land for Housing and Jobs' (GARP page 101) we note that the Gifford Hill Precinct proposal aligns directly with these objectives in that:

- The land does not encroach on places of high primary production, landscape or environmental significance.
- To account for zoned land that may not become available for development in Greater Adelaide due to landowner intention, an additional amount of land supply will be identified, emphasising the need to facilitate sites such as the Gifford Hill Precinct where land owner and development intentions are known, committed and master planning is underway to ensure genuine delivery of housing in the short, medium and longer term.
- A transparent and robust process for identifying the important infrastructure costs to GCGH and the community is being prepared to offer confidence in relation to infrastructure provision, housing cost, ongoing living costs, climate change resilience costs etc.
- It supports the plan for a high-growth scenario and the staged release of new land to meet the forecast demand of 300,000 dwellings in Greater Adelaide by 2051.
- It recognises that sub-regions such as Murray Bridge will have their own distinct part to play in Greater Adelaide's future (in this case as a satellite city) and that Murray Bridge Council will need to identify targets to accommodate growth.
- The project takes into consideration existing capacity of land that is available for development within the existing Murray Bridge township boundary. In this regard, even when one accounts for some modest additional residential development resulting from Council's proposed Residential Growth Areas Code Amendment (**noting there is 113 HA in these 3 growth areas and consists of 40 separate parcels with an average parcel size of 2.8 HA and thus are not profitable as englobo sites today**) the land that is both available and suitable for residential growth in Murray Bridge is very limited in area and highly fragmented.
- The project will need to be staged to accommodate rolling 15-year land supply for new communities and associated commercial, community, recreation and other supporting land uses.

Infrastructure

In relation to infrastructure, the Commission's 'Principles for Identifying Land for Housing and Jobs' includes the following Principle:

Principle 7: Identification and prioritization of growth areas will be based on the transparency of costs to community (infrastructure provision, housing cost, ongoing living costs, climate change resilience costs) for differing forms of supply

Recognising the criticality of infrastructure to the achievement of the Gifford Hill project, GCGH engaged early with Council and State Government and have participated in a number of production workshops focused on the preparation of a Community Infrastructure Model (CIM)

The production of the CIM has been a pivotal strategic endeavour for the Murray Bridge Council since 2020. The primary aim of this initiative is to identify the transport, social, and community infrastructure necessary for the future and align it closely with the projected growth in the region. The model not only provides a roadmap for development but also delineates timing triggers, cost estimates, and responsibilities for its delivery.

Recognising the significance of this project, the Council has engaged external expertise and engaging in a collaborative process with key stakeholders. Their goal extends beyond forecasting short-term requirements, it is about comprehending the long-term aspirations of the Murray Bridge community over the next 10, 20, and 50 years.

The Council has separated the CIM planning into two parts: the Murray Bridge CIM and the Gifford Hill CIM. Each CIM is further divided into several stages to ensure thoroughness. Stage 1 involved the development of the foundational Community Infrastructure Model, while Stage 2 focused on forward forecasting various Transport and Community Infrastructure interventions over the next 10- 50 years. Both of these stages have been successfully completed. Stage 3, which we understand is underway, will provide cost estimates for the identified infrastructure.

Infrastructure

The CIM model fits well with GCGH's vision for the Gifford Hill Precinct which adopts a 'whole of precinct' best practice planning approach, with a focus on the long term needs of the ultimate Gifford Hill community rather than incremental short term project stage planning typical of traditional greenfield development projects.

GCGH have consciously embraced a whole of precinct planning approach which affords the opportunity to provide social infrastructure properly from the start rather than in piece meal fashion.

Having been previously identified as suitable for growth and given the limited land available within the existing Murray Bridge township boundary, the Land of Interest represents a logical future growth area for Murray Bridge. This land is well connected in relation to transport routes into Murray Bridge and is convenient to existing and future planned services including infrastructure argumentation. The future development of these growth areas will build on existing and planned business, service and infrastructure investments within Gifford Hill and strengthen this new community in the long term.

Council has recognised that given the extent of land acquired by GCGH and the master planning underway to develop a cohesive and contiguous development outcome across the precinct for an additional 35,000 residents over the next 40-50 years, these new growth parameters must be incorporated into the estimates and subsequent costs, enabling the CIM's to be ratified and transformed into an infrastructure deed in consultation with the Government's new Housing Infrastructure and Development Unit (HIDU). The consolidated land ownership pattern in Gifford Hills' three growth areas will assist to instil confidence and enable the efficient provision of community infrastructure early in the development process.

GCGH is cognisant of the need to define and commit to the necessary hard and soft infrastructure across the development as a whole during the precinct planning phase.

In relation to hard and green infrastructure, this will evolve from the refinement of the master planning underway and inform an appropriate road, cycle and pedestrian network together with green (i.e. public reserves, vegetated habitat corridors, conservation areas) and blue (i.e. WSUD, wetlands, waterway) infrastructure which is designed in manner than can be progressively delivered over a series of stages.

Infrastructure

In relation to community facilities (i.e. education, health & well being, recreation and child focused facilities), GCGH are aiming to design and construct integrated facilities at a scale that will serve the longer-term community needs, rather than the typical approach of building multiple smaller, separate facilities that don't cater for local growth.

However, in order to do this, GCGH and investment partners (such a key commercial anchor tenants, community service providers, and the like) must have confidence and security of suitably zoned land availability which will accommodate the long term populations numbers they are planning and constructing for.

This strategic, consolidated infrastructure planning approach offers many benefits and efficiencies including cost savings, efficient land use, improved services, sustainability, and community cohesion. This approach can be a strategic solution to provide a wide range of services and amenities to the community in a more efficient and effective manner.

The availability of core utility services has also been central to the Masterplan and Council discussions and is detailed in the pages following.

The realistic approach to project staging together with a funding commitment by GCGH and the collaborative effort between the Council, HIDU and other key stakeholders seeks to shape the future of Murray Bridge in a sustainable and community-oriented manner.

In summary, Gifford Hill can be readily serviced with all essential infrastructure in a appropriately augmented, sequenced and timed manner to ensure the new and growing community has ready access to services and amenities and should be prioritised for strategic growth accordingly.

Service Provider and Capacity

Engineers have reviewed the current status and further requirements for all necessary infrastructure required for the proposed development, including water supply, sewerage, electricity/lighting, telecommunications and gas.

We are able to confirm that the necessary infrastructure can be made available to the Gifford Hill precinct in a timely and economic manner.

SERVICE PROVIDER	CAPACITY
Roads	Available
Comment	
The property is currently accessed from Brinkley Road, which extends under the South Eastern freeway into the town of Murray Bridge. Access to the South Eastern Freeway from Murray Bridge is currently provided by two onramps. The property sits between these two onramps, with the site connected via Brinkley Road and Old Swanport Road.	Whitehill Interchange Upgrade – This is the desirable upgrade required for exclusive Gifford Hill entry from the SE Freeway interchange and will need to connect to the site via the north west corner of the site. Concept design prepared and previous cost estimates undertaken in 2012-14. We highlight this road infrastructure upgrade will be included as part of the Community Infrastructure Model. Brinkley Road Upgrade – There is an existing Infrastructure Deed which notes the need to upgrade Brinkley Road and for sheltered right turn intersections to be constructed at entry points. These will be the first upgrades required to activate the precinct with funding in place to commence these works
SERVICE PROVIDER	CAPACITY
Potable Water (SA Water)	Augmentation
Comment	
SA Water has advised that multiple new potable water supply points and mains are to be constructed to supply Gifford Hill. A pump station and additional storage tank at White Hill are also required for potable water demand.	SA Water has indicated parts of the required augmentation will be a developer cost. This cost to duplicate the water main is estimated at \$1.5m, incurred upfront and has been budgeted for.

SERVICE PROVIDER

Sewer (SA Water)

Comment

SA Water has recently constructed a new \$50m Waste Water Treatment plant south of the Murray Bridge township, 2.5 kilometers south-east of the Gifford Hill site. A sewer main will need to be constructed between the WWTP and SE corner of the Gifford Hill site for connection of the whole development. SA Water have advised the cost of the main between the WWTP and SE corner of the site would be approximately \$1.2m and be the responsibility of the developer. Additional costs would apply to extend the main from the SE corner of the site to each stage of development.

Corey Grapentine, SA Water has provided detailed advice regarding the augmentation required at Gifford Hill.

CAPACITY

Available and Requires Extension

A pump station will be constructed to commence the development.

Indicative advice from SA Water relating to the cost of the Temporary Pump Station will be \$800,000.

The sewer will be constructed external the south boundary and provide an opportunity for gravity connection of reticulated sewer associated with the proposed development.

SERVICE PROVIDER

Gas (APA)

Comment

In line with recent provisions to implement Climate Change mitigation strategies and working towards a Gas Substitution Roadmap to move towards “all-electric” developments. As such, connection to reticulated gas services is now optional however will not be supported by the Gifford Hill precinct on environmental grounds.

CAPACITY

Available

SERVICE PROVIDER

NBN (NBNC_o)

Comment

Gifford Hill falls within the NBN service area. The surrounding is currently serviced with a wireless option. There will be backhaul charges associated with upgrades to service the area which can be provided in a timely and economic manner .

CAPACITY

Available

SERVICE PROVIDER

Electricity (SAPN)

Comment

Discussion with Christopher Luck, Network Project Officer at SA Power Networks has indicated electricity headworks infrastructure is available at this time. There is an 16kV overhead power line running along Brinkley Rd on the development side of the road, which will be able to provide initial development connection point.

CAPACITY

Available

The initial 355 allotments within the development can be accommodated within the existing network prior to augmentation requirements by way of sub-transmission and substation upgrades. These will be completed as the development progresses.

SERVICE PROVIDER

STORMWATER DRAINAGE

Comment

A stormwater basin and recovery system has been constructed in the north eastern corner of the adjoining race track land. This will become a wetland area. Council will require stormwater detention and water quality treatment measures to be implemented as development occurs to control 1in100 yr developed flows to pre-developed flows and quality.

CAPACITY

Available

There will be a requirement to implement stormwater detention and water quality treatment measures upfront prior to Stage 1 development. The cost of stormwater headworks requirements will be economical given the existing infrastructure in place.

Environment and Food Production Area

Introduced in December 2017, 'Environment and Food Production Areas' (EFPA's) were established to protect valuable rural, landscape, environmental and food production areas surrounding Metropolitan Adelaide from urban encroachment. Land division for residential purposes is prevented within the EFPA.

The inaugural review of the EFPA (which was combined with a review of the related Character Preservation Districts) occurred in 2021. Following the review, the Commission formed the view that sufficient land remained available to support housing and employment growth for a projected 15-year timeframe and as such, the EFPA boundaries were not amended.

We note however that the EFPA Outcomes Report acknowledges that the investigations conducted by the Commission did not consider land supply at the sub-regional level or specific forms of residential land supply (i.e. greenfield, township or urban infill).

As part of identifying long term land for growth (16 to 30 years), we note the Commission's intention to review growth opportunities within EFPAs as part of the GARP work, providing direction about areas that may be suitable for growth through the subsequent lifting the EFPA when the next statutory review of the EFPA is undertaken.

We understand this review would apply the Three test rule as follows:

- Test 1: area/s within Greater Adelaide outside the EFPA are unable to support the principle of urban renewal and consolidation of existing urban areas, and
- Test 2: adequate provision cannot be made within Greater Adelaide outside the EFPA to accommodate housing and employment growth over a minimum 15-year period; or
- Test 3: variation is trivial in nature and will address a recognised anomaly.

Environment and Food Production Area

While acknowledging the undeveloped, but zoned ‘Gifford Hill’ land technically offers a approx. 10 year housing supply for Murray Bridge, the GCGH proposal seeks to revisit the growth strategy for Murray Bridge to look beyond the shorter term, isolated infill of the existing Gifford Hill master planned zone, and embrace a long term vision for a 50-year forward plan which will transform Murray Bridge into one of Greater Adelaide’s significant satellite cities.

With the growth goal for Murray Bridge identified, that being a second city to Adelaide, it is evident that there is a limited amount of development ready supply available in the Murray Bridge region. This is evidenced by the recently released Land Supply Report for Greater Adelaide as illustrated below.

Figure 3-1 Greenfield Land Supply by Region June 2022 (c/- Residential Land Supply Report for Greater Adelaide - July 2023)

We also note that the removal of the EFPA over the Land of Interest would not undermine the ‘Primary Production Priority Area (PPPA)’ developed by Primary Industries of South Australia (PIRSA). PPPA’s were created in response to Planning Strategy directives including the ‘30 Year Plan for Greater Adelaide’ to identify areas of primary production significance based on a variety of factors including land capability, industry investment and land use, access to water, climatic considerations (including anticipated climate change) and any local conditions that give rural land special significance for primary production.



Environment and Food Production Area

In this context, it is recommended that the Land of Interest which is currently within the EFPA be identified as a future Broadacre Growth Area, thereby addressing sub-regional growth projections for the Murray Bridge region together with Greater Adelaide's longer term (30 year) growth rate projections.

Importantly we note that the PPPA does not apply over Murray Bridge or Gifford Hill, as illustrated in the following image

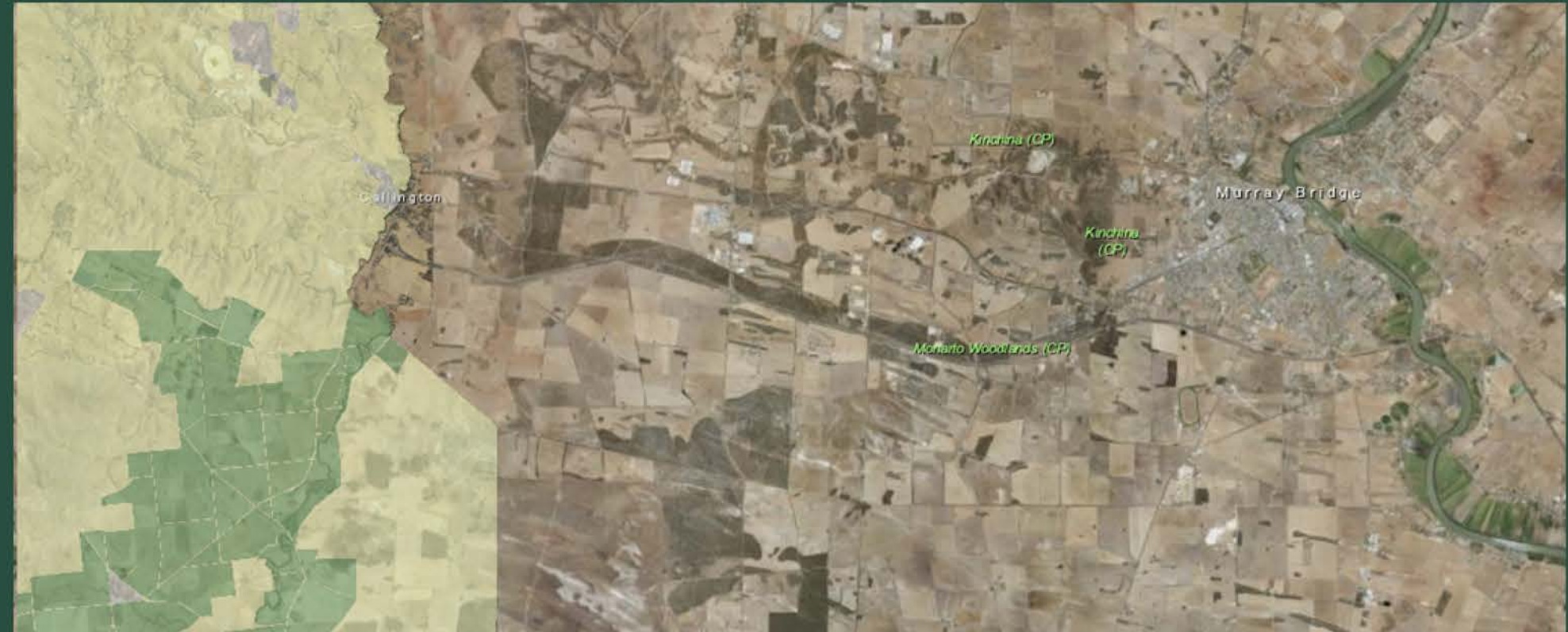


Figure 4-1 PIRSA, 2018, Primary Production Priority Areas (Daaset No. 1269), www.location.sa.gov.au (PPPA in Green)

Recommendation

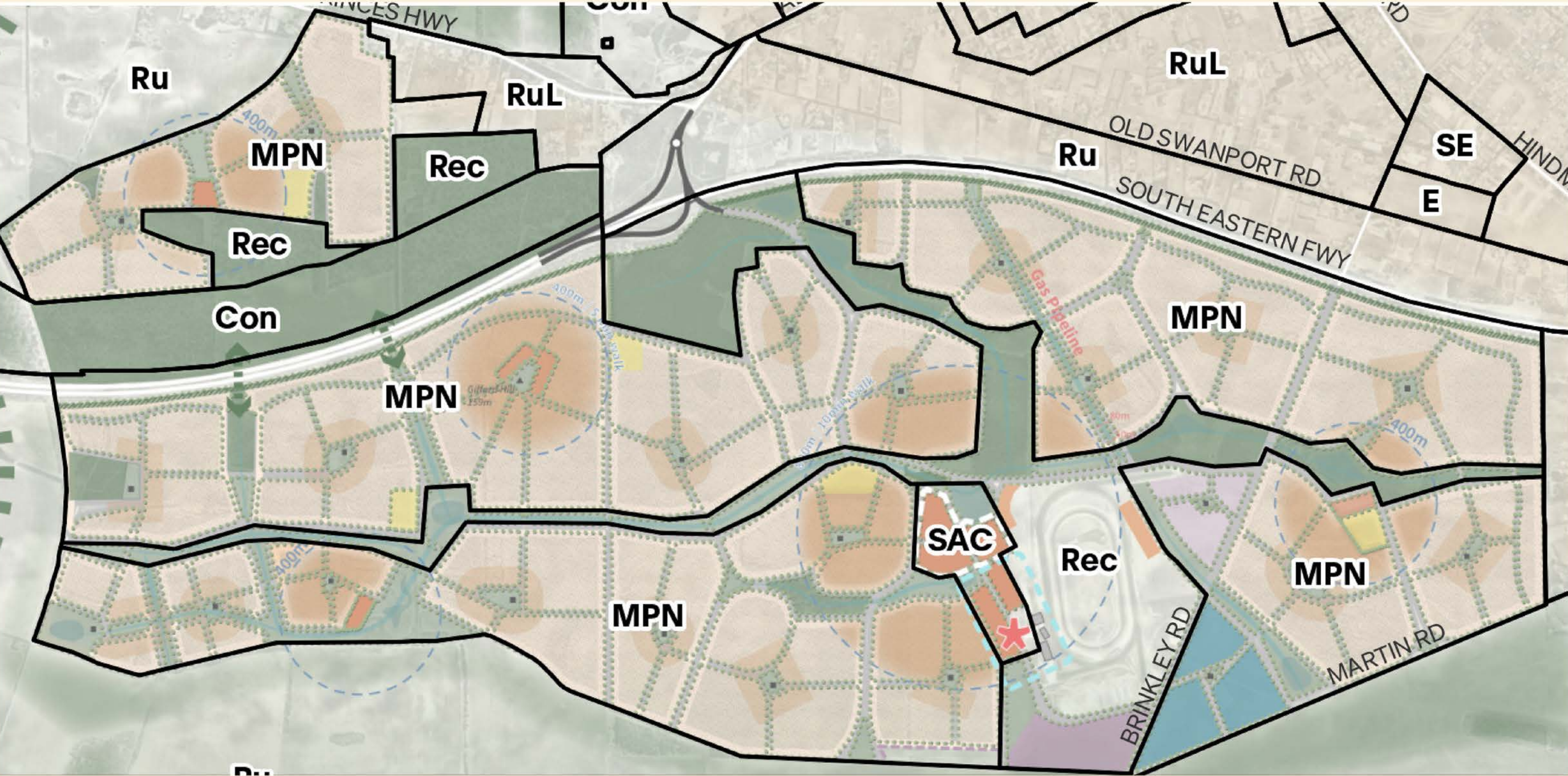
It is recognised that the realisation of the broader Gifford Hill Precinct would require a number of planning policy changes, achieved through a change in the EFPA boundaries and one or more Planning and Design Code Amendments.

To this end, key planning actions to unlock this precinct would include:

- A review of the EFPA boundaries which shifts the EPFA to the outer edges of the Land of Interest (Council identified growth areas 2 and 4) as illustrated in Murray Bridge Structure Plan (refer page 47)
- A review of the original Gifford Hill master planned area to reflect the expanded Gifford Hill Precinct Plan as presented, including amended and altered zone boundaries associated with the existing Master Planned Neighbourhood and Suburban Activity Centre, redistribution of the Recreation Zone, and deletion of the Rural Living Zone within Gifford Hill
- The rezoning of land to the east of original Gifford Hill master planned area (Council identified growth area 4) from Rural Zone to Master Planned Neighbourhood together with other complementary Activity Centre zones (TBD)
- The rezoning of land to the west of the original Gifford Hill master planned area (Council identified growth area 2) from Rural Zone to Master Planned Neighbourhood Zone or alternatively, identification of this land within the SA Property and Planning Atlas (SAPPA) as 'Growth Area Broadhectare' to recognise this land for future growth

These key changes are indicatively illustrated in the next page:

Gifford Hill Precinct Zoning Map



Proposed Zoning Map

Conclusion

As outlined in the GARP, planning for the growth of a satellite city at Murray Bridge will open up the area with established infrastructure, services, and local economies, and development will provide opportunities for further growth, supported by improved planning and coordination of new infrastructure.

It is clear the Commission recognise the important role satellite cities play in managing growth in the metropolitan region by offering more affordable housing options while retaining the benefits of a highly liveable urban centre.

We seek for the Commission to step back, put previous impressions aside and consider the huge potential that Murray Bridge and its surrounds offer the Greater Adelaide region and the State generally, and the opportunity presented by GCGH to **finally unlock our second city.**

GCGH are excited to progress and identify the optimal development outcome for the Gifford Hill Precinct and are keen to work closely with the Commission, Council and key stakeholders to redefine the public view and expectations in relation to this new community, which has the potential to elevate Murray Bridge, capture the employment opportunities before it and transform the town into Adelaide's second city given the associated job generation, existing and new infrastructure and desirable lifestyle qualities.

The Ergonomist Report

Report Intention and Scope

This report intends to agronomically assess the areas defined in the following map, bordering Murray Bridge. Specific focus will be provided to soil type, chemical and physical soil constraints, rainfall, climate, cropping composition and yield potential, and grazing value



Figure 5-1. Google Earth Satellite image of proposed areas of residential development, White Hill in blue, and Gifford Hill in orange (Google Earth, 2018)

Soils

Soils in the region are typically calcarosols and sodsols, depending on topography (CSIRO, 2013). These soils feature low organic carbon, rarely >1%, with the highest organic carbon levels existing in the top 0-15cm due to crop residues and root biomass. The soil texture is sandy to sandy loam, with clay deeper in the profile, often as a result of sodicity causing clay to leach. The low clay content of the topsoil leaves it prone to erosion, so adequate ground cover is a key aim of most growers in the region, so it is not unusual for sand hills to be sown to cereals such as rye to provide more resistant stubble to retain cover over summer. Modern farming techniques, such as stubble retention and no-till have reduced erosion, however sand hills are still fragile

Additionally, the swales often feature chemical constraints such as sodicity, a characteristic of sodsols. A high concentration of sodium ions will saturate the cation exchange capacity, leading to a loss of soil structure, particularly between clay particles, causing the clay to leach through the profile and create hard pans. Soil tests in nearby paddocks (appendix 1 & 2) indicate highly elevated sodium levels, at 24% of the cations, four times the upper acceptable limit, classifying them as highly sodic (Overheu, et al., 2021).

Calcarosols feature high calcium carbonate content, typically manifesting as limestone sheets or rubble, or as free lime within the soil. Poor structure at depth is widespread, with numerous paddocks featuring hard pans or limestone sheets that restrict the root penetration of annual crops, consequently limiting the availability of water as it percolates deeper into the profile beneath the hard pan, rendering it inaccessible to plant roots. Furthermore, the elevated pH, calcium carbonate content, and the absence of clay or organic matter result in a limited nutrient-holding capacity,

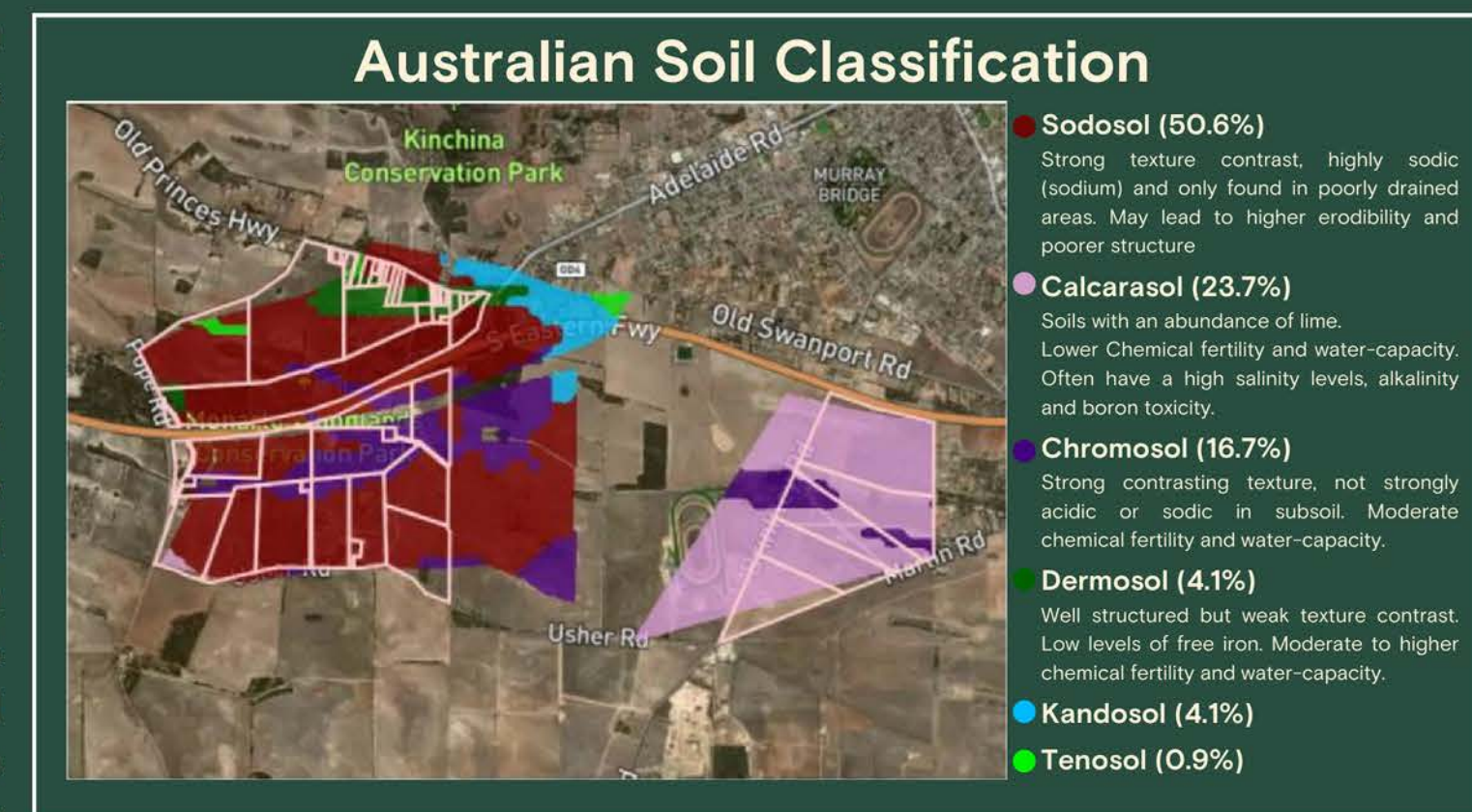


Figure 6-1. Soil type map generated by Agtuary, derived using data from the CSIRO Soil and Landscape Grid

particularly for trace elements like magnesium, manganese, copper, and zinc. Tissue tests from neighbouring paddocks reveal deficiencies in these elements, even in fields where these nutrients were applied during sowing, indicating a challenge in retaining the applied nutrition, even from applications at the beginning of the season.

Despite the high presence of calcium, and alkaline pH, soils in the region do not strongly buffer phosphorous. Often in calcarosols, phosphorous will be tightly bound and become plant unavailable, with this soil feature referred to as phosphorous buffering index (PBI). In the soil tests,

PBI is low, meaning applied phosphorous is likely to remain plant available which can reduce the need for higher rates of phosphate fertilisers, or the use of more expensive phosphorous sources, such as liquid phosphates.

Both calcarosols and sodsols are inherently low fertility soils, which both feature chemical and physical constraints which limit production (Nuttall, et al., 2003). These features are largely a result of the parent material from which these soils developed, so little can be done to mitigate these constraints entirely. In conjunction with low rainfall, this renders the Gifford Hill and White Hill area a relatively marginal agricultural zone.

Climate

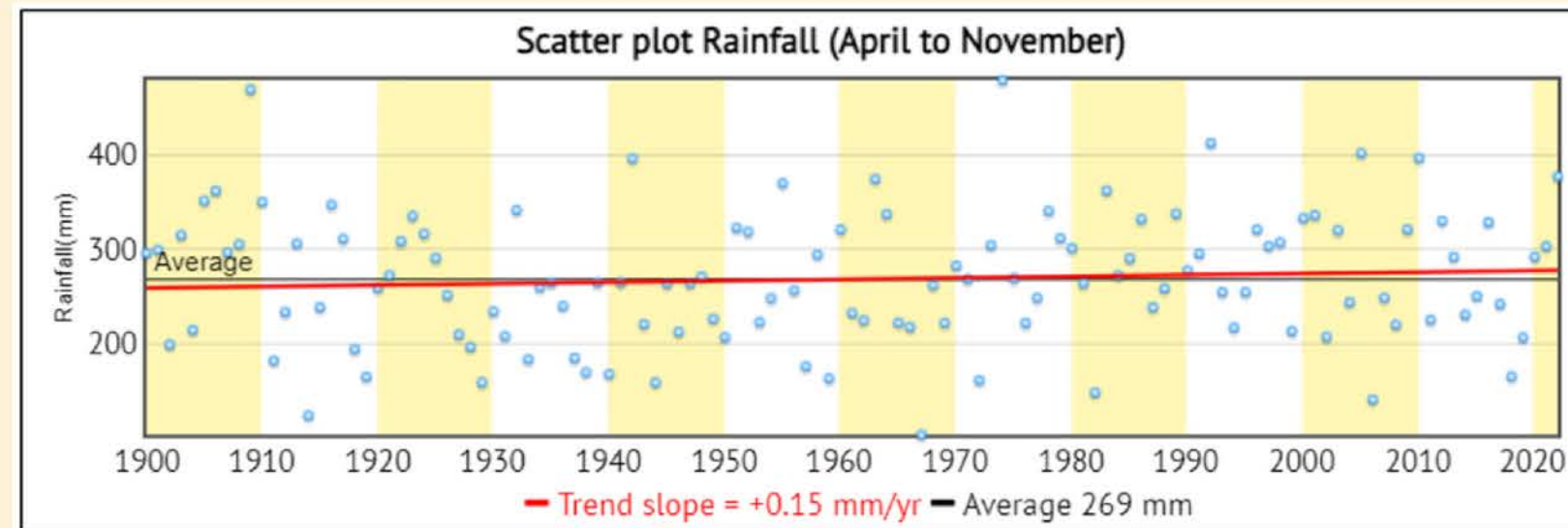


Figure 7-1. Average monthly rainfall for Gifford Hill and White Hill generated by Agtuary

According to the SILO Database, the areas highlighted in this project receive 373mm of rainfall average annual rainfall, with figure 7-1 indicating that the majority occurring between April and November

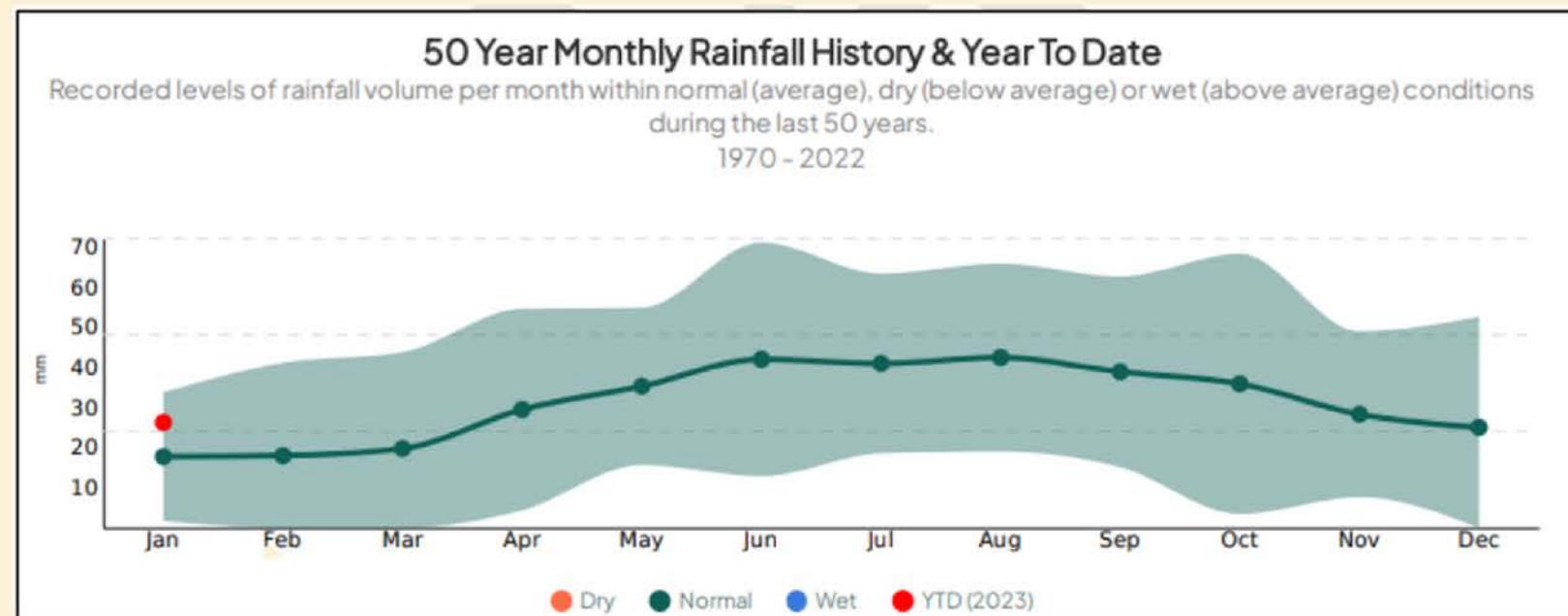


Figure 7-2. Rainfall between April and November, as well as rainfall trend since 1900, generated with CSIRO's Climate

Figure 7-2 indicates that the average growing season rainfall (GSR) is 269mm, with a very minor positive increase in average GSR rainfall since records began. The scatter plot provides some visual indication of rainfall variability in the region.

Climate

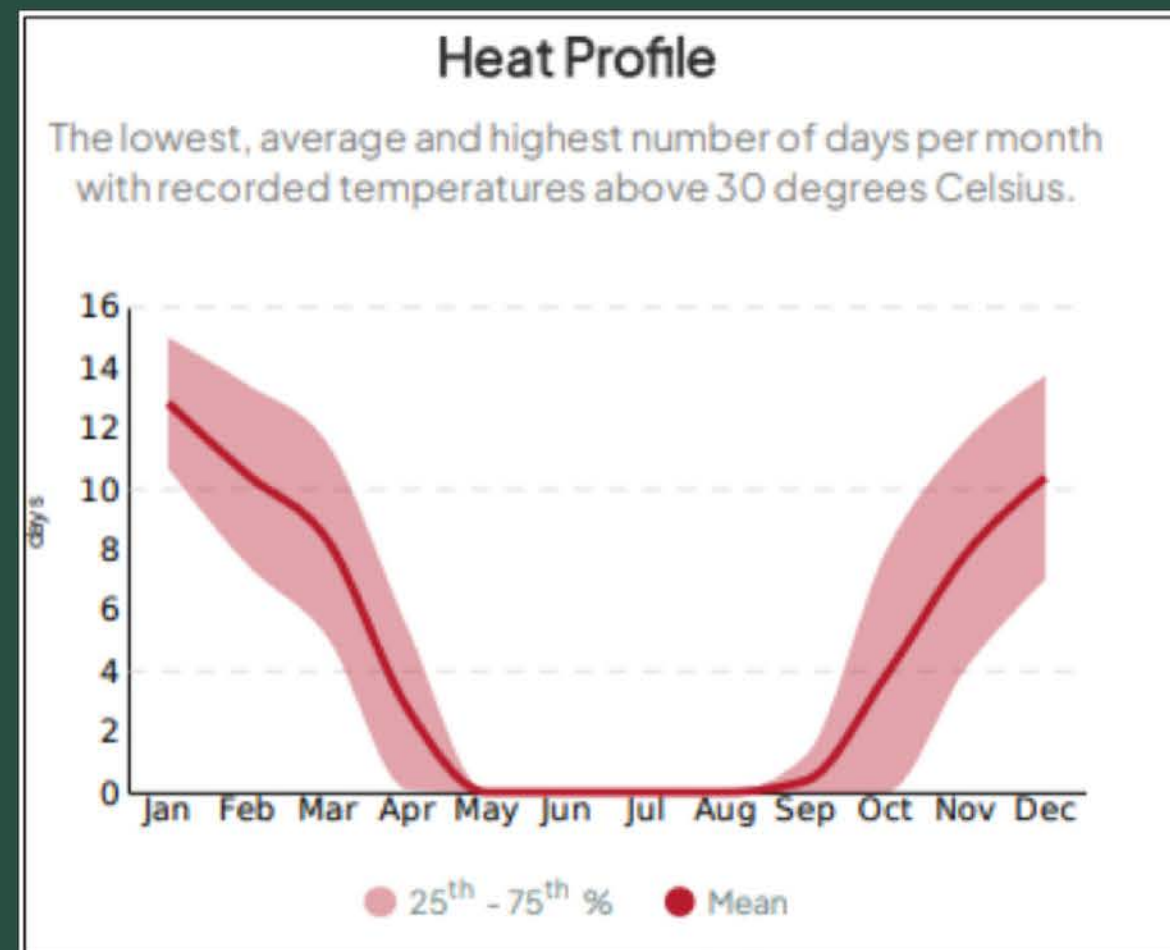
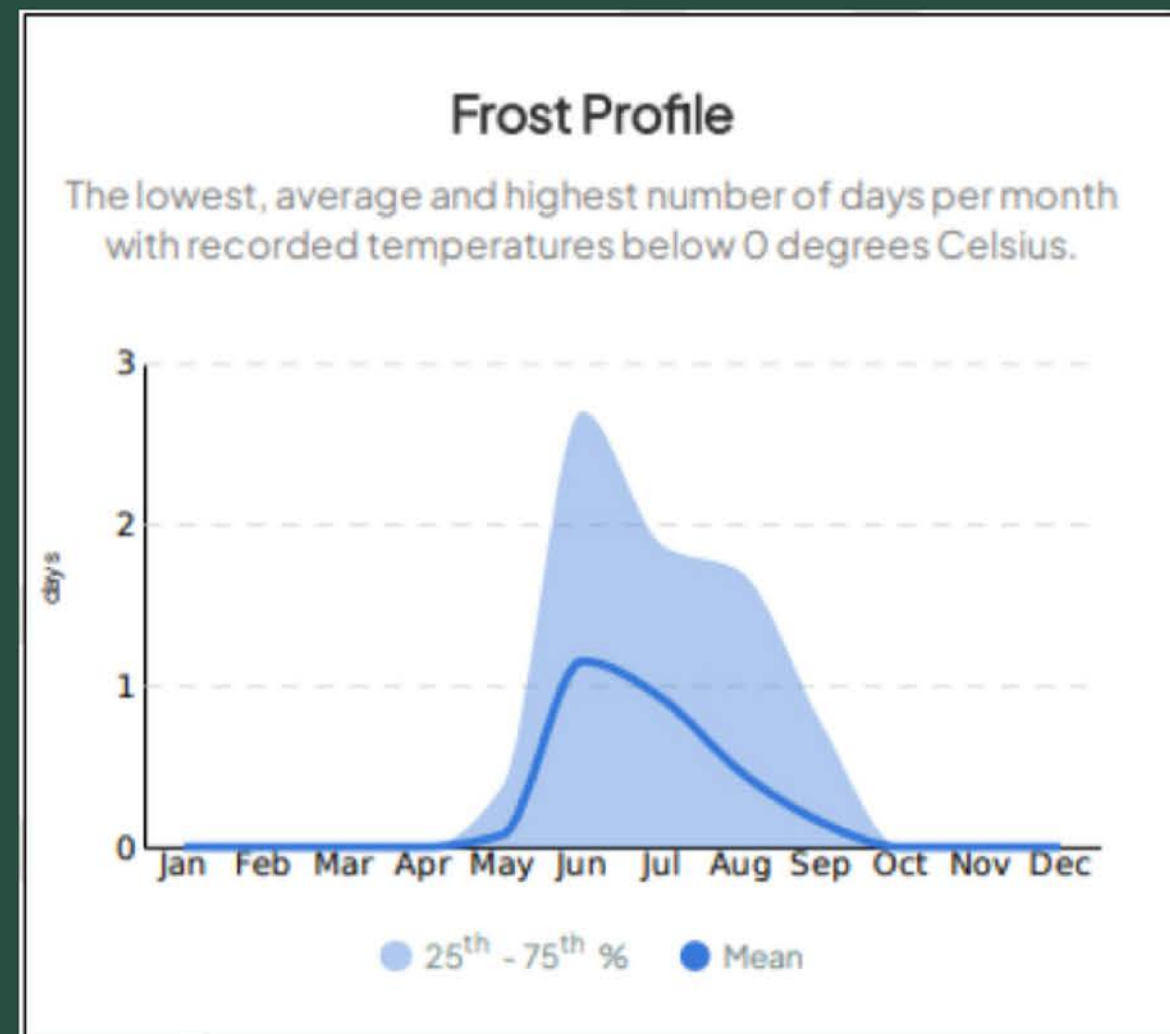


Figure 7-3. Likelihood of frost and frost duration during the year, generated with Agtuary

Figure 7-3 indicates the distribution of frost events (days below 0 degrees) across the year. Most events occur in June, with the likelihood of occurrence dropping off significantly beyond July. Many crops will be in the vegetative stage during this period of the year, so the risk of frost damage is low, as flowering crops are most sensitive. In some years where the season break is later than usual, crops may be germinating in June which could lead to some frost damage; however, crops typically recover or compensate from this type of frost damage.

Figure 7-4. Likelihood of days over 30 during the year, generated with Agtuary

Perhaps a greater concern (for crop production) in the Gifford Hill and White Hill areas is heat stress. Temperatures over 31o during the reproductive stage (flowering) of wheat will cause yield loss, by causing flower abortion or decreasing grain fill rates (Rehman, et al., 2021). Figure 7-4 indicates that in October, an average of 4 days above 30 degrees will occur, which makes the likelihood of terminal heat stress significant. Providing there is adequate moisture, or growers select earlier flowering varieties, these impacts may be mitigated or avoided by ensure flowering does not occur in this period

Enterprise Composition

Using data collated by Agtuary, in an average year, 42% of the land use in the highlighted Gifford Hill and White Hill areas will be used for winter cropping, and 35% used for grazing. These numbers are similar to what is seen in farm plans prepared for nearby properties, where 39% of total farm area was left as medic pasture, 26% was sown to barley, 11% sown to wheat, 3% sown to faba bean, and the rest left for fallow or sown pasture. This year, it appears most of the highlighted area has been used as unimproved medic pasture; however, this is simply from a visual assessment made in passing, and not based on actual paddock inspections or other data.

Cropping

The region predominantly grows cereal crops, including barley and wheat, complemented by triticale and rye. Pulses like vetch and faba beans are gaining favor due to their adaptability to low rainfall and soil-enhancing properties. Vetch is used mainly for grazing and hay. Lentils are emerging as a lucrative break crop, known for herbicide resistance and high grain prices, but face challenges in harvesting due to limestone rubble.

Lupins, sensitive to calcium, are rare, while field peas see limited use despite a nearby feed mill. Canola, thriving in low fertility soils and ensuring good harvestability, is a popular break crop but requires significant fertilizer investment. Hay is crucial to the local sheep farming industry and is usually sown to vetch, barley, or oats.

Typical cereal yields are 1.5-2 tonne/ha, with canola, faba bean, and lentils yielding around 0.5-1 tonne/ha. Crop success hinges on efficient management practices including weed control, nutrition, and addressing soil constraints.

Grass weeds, notably brome grass and ryegrass, are a significant concern. Minimal cultivation practices have led to weeds with extended seed dormancy and potential herbicide resistance. Non-wetting topsoil, due to hydrophobic compounds, hampers water infiltration and crop germination. Growers counteract this by using surfactant-based soil wetters and incorporating organic matter. The low fertility of the soil necessitates careful nutrient management, often using foliar trace elements, for successful cropping.

Pasture

The bulk of pasture in the region is self-replacing medic, often with low productivity and low DSE. Almost 100% of livestock in the area is sheep, with Barrel medic is well suited to alkaline soils in the low rainfall zone, as these medic species thrive in more basic soil conditions as opposed to acidic soils. Pasture productivity is largely determined by the management of the land holder, however much of it is left as unimproved pasture. Likelihood of days over 30 during the year, generated with Agtuary 5 sow barley or vetch for grazing which can provide significantly more productive pasture with greater carrying capacity.

According to Dr. Stephanie Warick, a general guide for determining stocking rate potential is to calculate 2 dry sheep equivalents (feed required to allow a 50kg dry ewe to maintain condition) per 100mm of growing season rainfall. Assuming Gifford Hill and White Hill receive 269mm GSR, this suggests that a DSE of 5.38 is attainable, if managed correctly. This calculation does not consider the soil constraints mentioned previously, so it is likely that 5.38 DSE is higher than practical in sodic or calcareous soils. A ewe with lamb at foot will require 2.4 DSE, so therefore the stocking rate per ha becomes 2.24 ewes with one lamb (Mcdonald & Orchard, 2022).

Conclusion

The highlighted areas in Gifford Hill and White Hill are marginal, low rainfall agricultural areas. Due to the chemical and physical soil constraints, paired with low annual and growing season rainfall, successful crop or pasture production is typically limited.

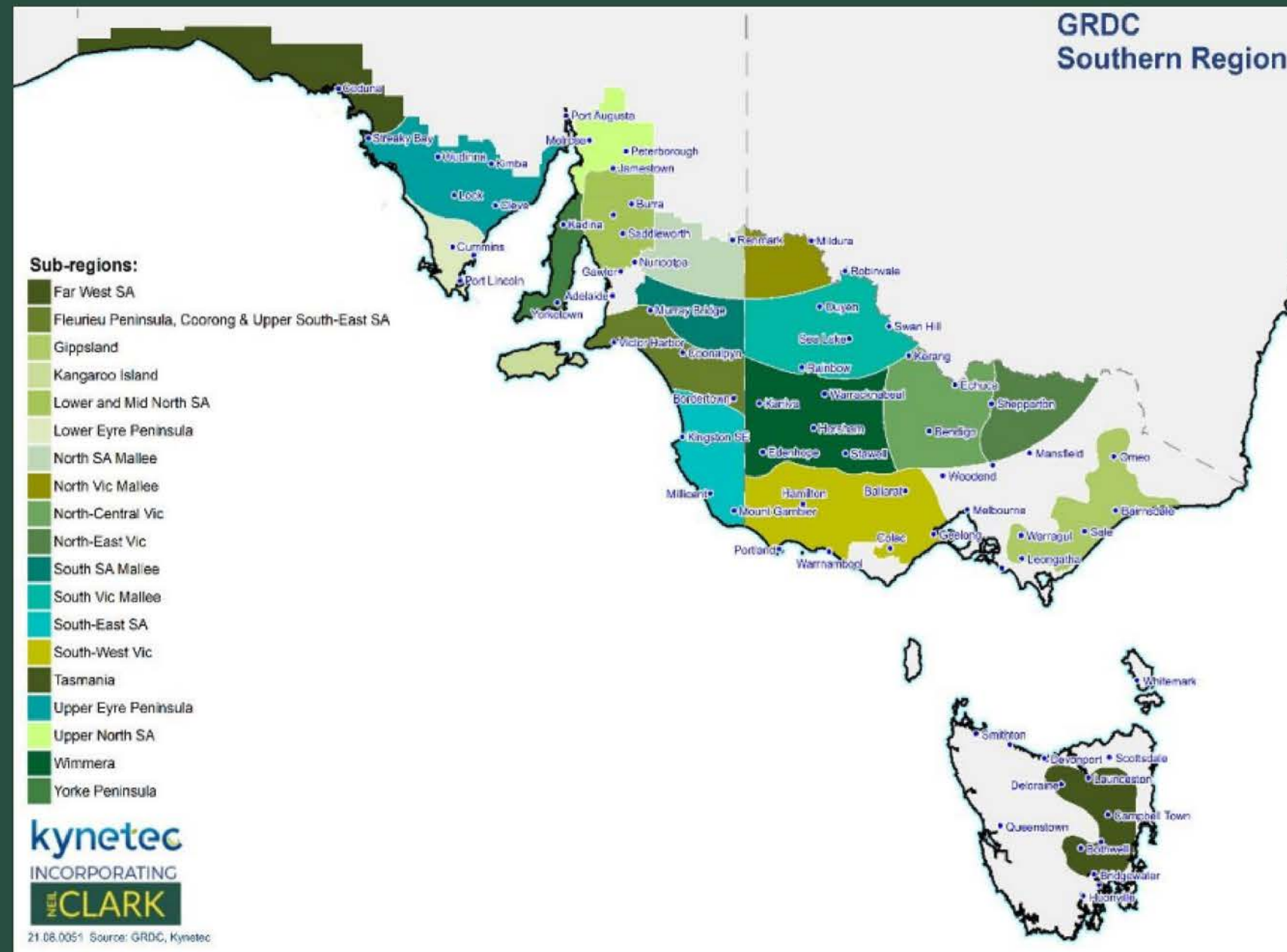


Figure 8-1. Likelihood of days over 30 during the year, generated with Agtuary

The areas outlined North of Adelaide in the GARP would be considered part of the Lower and Mid-North cropping region, which traditionally are part of the mid and high rainfall zone. Soil types in these areas typically have a higher clay content and better fertility, however, can experience different constraints such as compaction and acidity. The fertile soil and higher rainfall do mean that these areas are likely more significant in terms of their contribution to South Australia's food production than the more marginal areas of the South SA Mallee, particularly on the poor soils in the Gifford Hill and White Hill area outlined in figure 8-1.

About GRANGE



MISSION STATEMENT

Our mission is to foster an environment of intellectual excellence, driven by quantitative analysis and the collective intelligence of our team, resulting in an ability to conceive projects that resonate with environmental and human values.



The *Grange Portfolio*



Projects	15
Land Area	2,235 Ha
Lot Yield	23,712
Apt	497



The Costa Portfolio



Projects	9 Current + >20 Completed
Land Area	1,400 ha
Lot Yield	14,100
Apt	360



TRACK RECORD

Grange Current Projects



ACACIA
RISE

Twm Rivers
ESTATE

NORTHBRIDGE

BLOOM
BALLARAT

6
C
SP

BOTANICA

GIFFORD HILL

WILLOW
BUNGAREE

EDEN
CAMBRIAN HILL

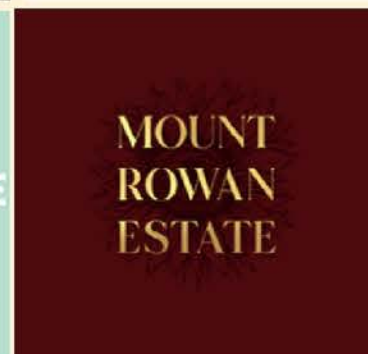
RIVERGUM
ESTATE
HUNTLY

NUMA
NEDLANDS

MOUNT
ROWAN
ESTATE

TRACK RECORD

Costa Current Projects



OUR COMPANY VALUES

*Fusion of
Intellectual curiosity
and grace of humility*



*Work ethic,
tenacity and
perseverance*



*Empathy, kindness &
respect of culture*



*Innovation and
adaptability*



*Collaboration and
teamwork*



OUR DEVELOPMENT VALUES

*Environmental
Leadership*



*Caring
For Country*



*Growing
Sociability*



*Innovation
& Timelessness*



Authenticity



Thank you

DTI:PlanSA Submissions

From: Ryan Moyle [REDACTED]
Sent: Monday, 6 November 2023 1:57 PM
To: DTI:PlanSA Submissions
Cc: terry Demeo; James Dibble; Dwayne Delmenico; Rebecca Thomas
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper - Sharpe Road and Temby Road Two Wells
Attachments: 01646_001_20231106_GARP Submission_Grange_FINAL.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir/Madam,

Please find attached a submission to the *Greater Adelaide Regional Plan Discussion Paper* on behalf of **Grange Development Pty Ltd**, who have sole management and control of a significant landholding situated between Sharpe Road and Temby Road, Two Wells.

We look forward to the next stages of preparation of the Draft *Greater Adelaide Regional Plan*.

Kind regards,

Ryan Moyle
Senior Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000

[REDACTED]
www.ekistics.com.au



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

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3rd November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

**RE: SUBMISSION ON THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER – GRANGE
DEVELOPMENT LAND AT SHARPE ROAD & TEMBY ROAD TWO WELLS**

1. INTRODUCTION

We act for Grange Development Pty Ltd ['Grange Development'], who have sole management and control a significant landholding situated between Sharpe Road and Temby Road Two Wells, located within the Adelaide Plains Council (the 'subject land').

The subject land has been identified within a 'Growth Investigation Area' under the Greater Adelaide Regional Plan Discussion Paper (the 'Discussion Paper'), which is supported by our client who has expressed an immediate desire to rezone and development the land for commercial and residential purposes.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Regional Plan for Greater Adelaide and seeking community and stakeholder input to inform the strategic direction on how and where Greater Adelaide should grow.

As set out in the submission below, the subject land is highly suitable for urban expansion based on its single ownership and limited constraints. It is well positioned to be developed to meet the urban growth needs for Greater Adelaide.

2. SITE AND LOCALITY OVERVIEW

2.1. Land Description / Identification

The subject land comprises the following three (3) Certificates of Title, as listed below and as illustrated in **Figure 2.1**:

1. Section 465 in Hundred Plan 140800 (Lot 465 Secomb Road, Two Wells) Certificate of Title Volume 5522 Folio 886;

2. Section 467 in Hundred Plan 140800 (Lot 467 Sharpe Road, Two Wells) Certificate of Title Volume 5526 Folio 872; and
3. Section 468 in Hundred Plan 140800 (Lot 468 Secomb Road, Two Wells) Certificate of Title Volume 5374 Folio 310.

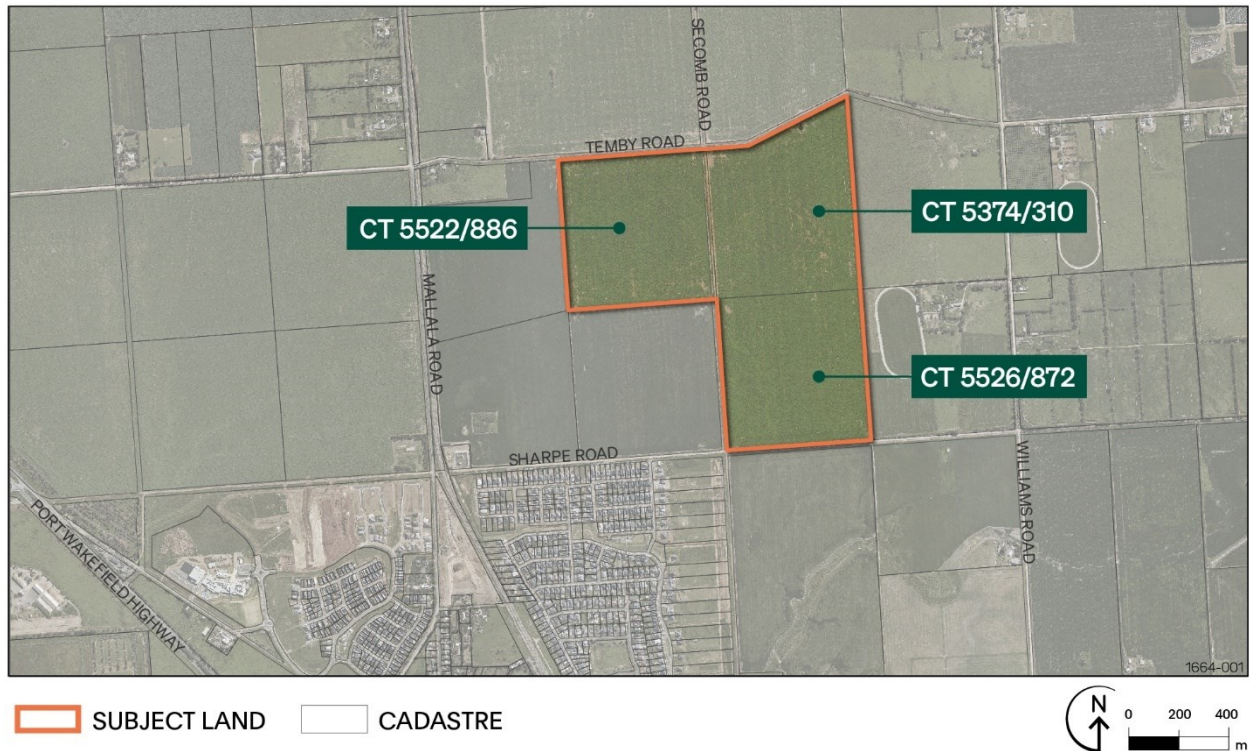


Figure 2.1: Aerial of Subject Site

The landholding comprises an overall area of approximately 105.17 hectares, with frontages to Secomb Road, Sharpe Road and Temby Road. Secomb Road runs north-south, dissecting the subject land into two portions. The subject site is mostly flat and devoid of any structures, buildings or vegetation, other than for one mature tree located in the north-western portion of the land.

Relevant to this submission, the current land has not been highly productive and is used for low-intensity cropping and grazing.

2.2. The Locality & Context

The subject land is situated in a relatively flat area that generally comprises low intensity cropping and grazing, or agricultural uses. The locality is largely cleared of vegetation, with several parcels being devoid of any buildings or structures.

To the south-east of the subject land, is a combination of Rural Living allotments (approx. 1 hectare in size) that front Secomb Road and form part of the eastern extent of the Eden Two Wells estate. The Eden Two Wells estate abuts Sharpe

Road, and comprises the rear boundaries of allotments along this interface with no vehicle access via Sharpe Road into the estate. Although it appears Almond Boulevard has been designed to accommodate a future connection to Sharpe Road.

To the south of the subject land are large allotments used for cropping and grazing. These allotments contain the Salt Creek corridor, which flows to the south-west through Two Wells and to the west of Port Wakefield Highway through to Middle Beach. It is expected that this area would be subject to flooding in peak rain events.

To the east of the subject land are several parcels used for horse stabling and husbandry. The parcel abutting the subject land to the east, also comprises a dwelling. Land to the north of the subject land, across Temby Road, is largely used for horticultural purposes.

To the west of the subject land is low intensity cropping and grazing, with Mallala Road and the railway line provided a break between the Rural Horticulture Zone and Master Planned Township Zone.

2.2.1. Strategic Context - Adelaide Plains Council

Adelaide Plains is one of SA's fastest growing Councils, with 80% of known population growth around the township of Two Wells facilitated by the approval of the 'Two Wells Residential Development Plan Amendment' (DPA) in 2013 which enabled the expansion of the Two Wells township by an additional 3,000- 3,500 dwellings and an anticipated 8,000 and 11,000 new residents. The majority of growth has occurred to the north of the established township in the Hickinbotham Eden Estate and the Liberty Estate.

Council recently adopted a 'Growth Strategy and Action Plan' (GSAP) at its meeting on 24 April 2023 to identify strategies and actions to achieve the liveable population growth of Adelaide Plains. A key initiative of the GSAP is the establishment of a 'three town service model' with sustainable growth within Two Wells, Mallala and Dublin (refer to **Figure 2.2**).

The GSAP envisages a cohesive country community of 10,500 people in Two Wells with actions to support township growth including a revitalised Main Street, a Council / Community civil hub, a walking and cycling plan, an expanded recreation and sport hub and increased housing options via a 'Community Waste Water Management Scheme' (CWMS) for the original township.



Figure 2.2 'Three town service model' - Growth Strategy and Action Plan' (Source: Adelaide Plains Council)

As part of preparation of this submission a comprehensive review of relevant policy across State Government and Adelaide Plain Council was undertaken, including State Planning Policies, The Regional Plan - The 30-Year Plan for Greater Adelaide – 2017 (Update), and key Council strategic plans such as the Adelaide Plains Strategic Plan 2020-2024, the Adelaide Plains Council Growth Strategy & Action Plan, and more. Relevant to this submission are the following key findings:

- The Two Wells township and town centre is undergoing substantial community & social infrastructure investment to cater for anticipated rapid growth and expansion of Two Wells;
- Key projects including the new 'Town Centre Development Site' and 'Two Wells Oval Precinct' currently being undertaken by Council;
- Creation of new pedestrian and cycling paths through the subject land, connecting anticipated growth areas to the existing Two Wells township;
- A clear direction across all levels of government for the short-term delivery of substantial volumes of affordable housing, particularly in areas that are established, well-served, & connected to jobs;
- New housing & jobs should be established along key transport corridors;
- Building community resilience to the effects of climate change (WSUD, urban forestry, walkable neighborhoods); and
- Protection of prime agricultural & horticultural land.

2.3. Existing Zone & Policy Framework

The subject land is currently located within the 'Rural Horticulture Zone' of the Planning and Design Code (Version 2023.15 dated 26 October 2023). **Figure 2.3** identifies the current zoning that applies to the subject site and surrounding properties.

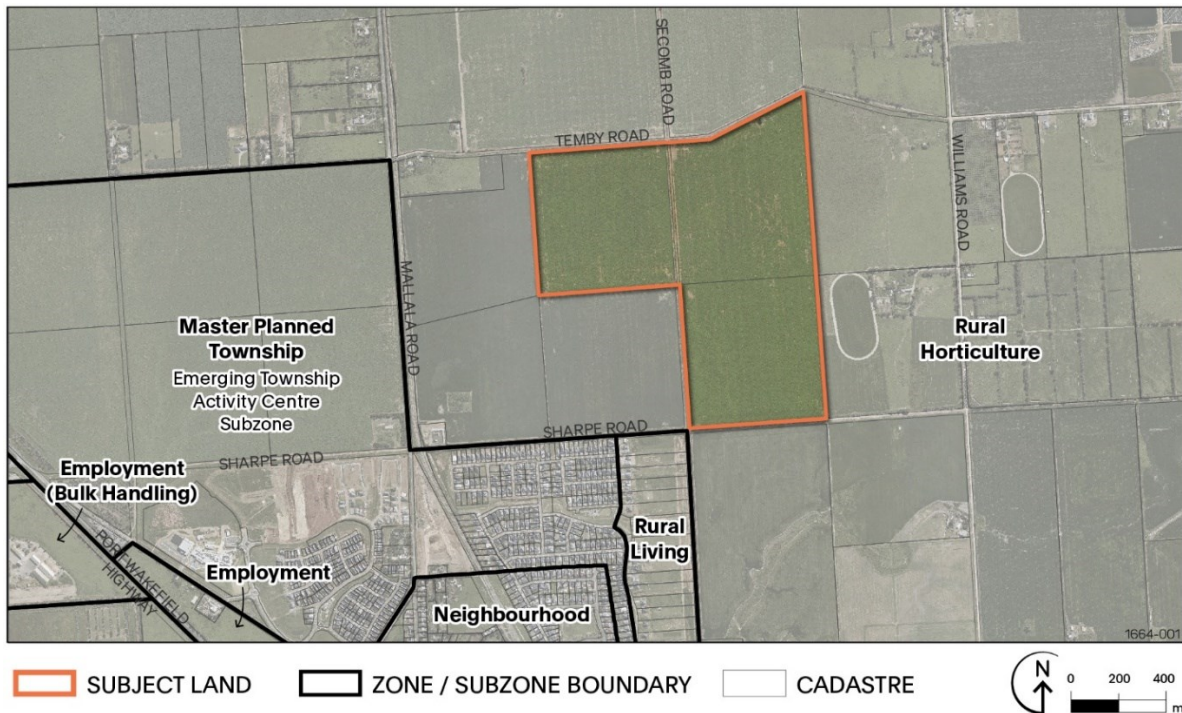


Figure 2.3 – Existing Zoning

The subject land is affected by a number of 'Overlays' as follows:

- Environment and Food Production Area
- Hazards (Acid Sulfate Soils)
- Hazards (Flooding)
- Hazards (Bushfire - General)
- Hazards (Flooding - General)
- Hazards (Flooding)
- Major Urban Transport Routes
- Native Vegetation
- Water Resources

The subject land is also affected by Technical Numeric Variations (TNV), including a Minimum Site Area (Minimum site area 8 ha) and Concept Plan (Concept Plan 99 – Two Wells).

3. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

The Greater Adelaide Regional Plan (GARP) Discussion Paper identifies that current population projections demonstrate that by 2051 we must plan for an additional 670,000 people in Greater Adelaide. The Paper outlines that we need to supply 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes beyond the current capacity for an additional 200,000 homes (164,000 homes in land already zoned for residential development and a further 47,000 homes that could be accommodated on land already identified for future residential rezoning). The Paper identifies that an additional 100,000 homes is the equivalent of 10 Concordia or Dry Creek developments, and that under this growth scenario that we will run out of land for future residential development within Greater Adelaide within 30 years if an ongoing rezoning program is not developed.

The Discussion Paper has identified that growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success.

The Paper projects that the highest proportion of new growth will be located within the 'Outer North' area, with almost 18,200 new homes or 18% of the projected 'Future Urban Growth' within this area of Greater Adelaide (refer to **Figure 3.1** below).

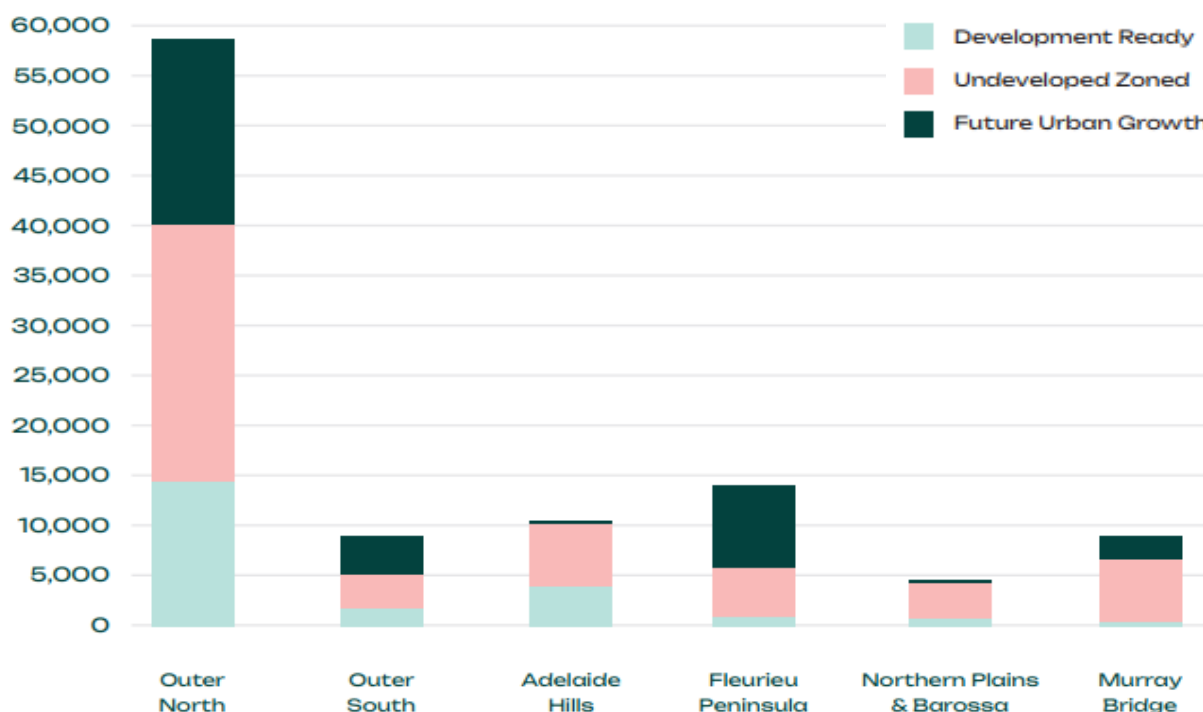


Figure 3.1: Projected Future Land Supply CBD

(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023, page 108)

The Discussion Paper identifies four (4) main greenfield ‘Investigation Areas’ on the fringe of Metropolitan Adelaide for future housing and employment growth, with these areas being based on the State Planning Commission’s seven (7) identified land supply principles (also referenced in the Discussion Paper). The areas proposed for detailed investigation extend from Adelaide’s four major transport spines with the intent to capitalise on ongoing government investment along these growth corridors.

This includes a ‘north-west spine’ that begins at the southern end of the Port Wakefield Highway stretching northward past the Riverlea development to Two Wells, and then continues further north along the highway.

We note the following challenges identified in the Discussion Paper for the ‘north-west spine’ and the suitability of the subject land to address each of the challenges identified:

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
<ul style="list-style-type: none"> - Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed. - Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance. 	<p>The Paper identifies that land within the current EFPA would likely meet future growth needs in the 16-30 year period. The subject land is located within the ‘Growth Investigation Area’ of Two Wells as demonstrated in Figure 4.1 further below.</p> <p>Whilst noting the location of the subject land within current EFPA, we note that the land is contiguous with existing land used of residential purposes to the immediate south-west. Temby Road situated on the northern boundary of the site would function as the most logical northern township boundary extent for Two Wells and would align with the existing Master Planning Township Zone to the west of the subject land. Inclusion of the subject land represents a logical expansion of the Two Wells township in a concentric manner, and maximises the strategic location of the site to existing services and infrastructure, as well as future investment within the township core.</p> <p>Existing growth of Two Wells has traditionally occurred in an elongated manner along the north-west to south-east axis, which if continued, would result in new growth areas been located further from the town centre (than the subject land).</p>

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
	The land can be immediately developed given access to existing transport networks and services (i.e. does not need to wait for the 16-30 year period).
- The area is currently not supported by high frequency public transport and would require significant investment in trunk infrastructure to support urban growth	The subject land provides substantial opportunity for a master planned development comprising up to 1,310 dwellings for Two Wells. This growth, in addition to ongoing growth in other areas of Two Wells, nearby Virginia and Buckland Park, would support, underpin and justify future investment in public transport (such as high frequency bus routes).
- It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency	The subject land will contribute directly to the local economy and within close proximity to and connection with the established Edinburgh Parks further south which the GARP Discussion Paper identifies as a strategic strength of the 'North-Western spine'.
- Hazards and environmental issue such as flooding would need to be considered and managed.	Early analysis of the subject site has identified the ability to develop an appropriate response to the management of drainage across the site without the need for substantial earthworks and encouraging the collection, treatment and re-use of stormwater as part of a water sensitive urban design (WSUD) outcome.

4. SITE SUITABILITY FOR URBAN DEVELOPMENT

4.1. Logical Urban Expansion

The subject land is immediately adjacent the north-eastern edge of the existing, and near complete, Eden Two Wells estate. This growth front is most likely to continue outwards, resulting in a concentric growth for Two Wells. Concentric growth is typically the most efficient way for towns to grow, where urban development is centred around the central township core. This leads to maximising access to existing infrastructure and services already present in the township, and can further justify further investment and expansion of these services.

This position is supported through the GARP Discussion Paper, which identifies the subject land within a 'Growth Investigation Area' of Two Wells as demonstrated in **Figure 4.1** below.

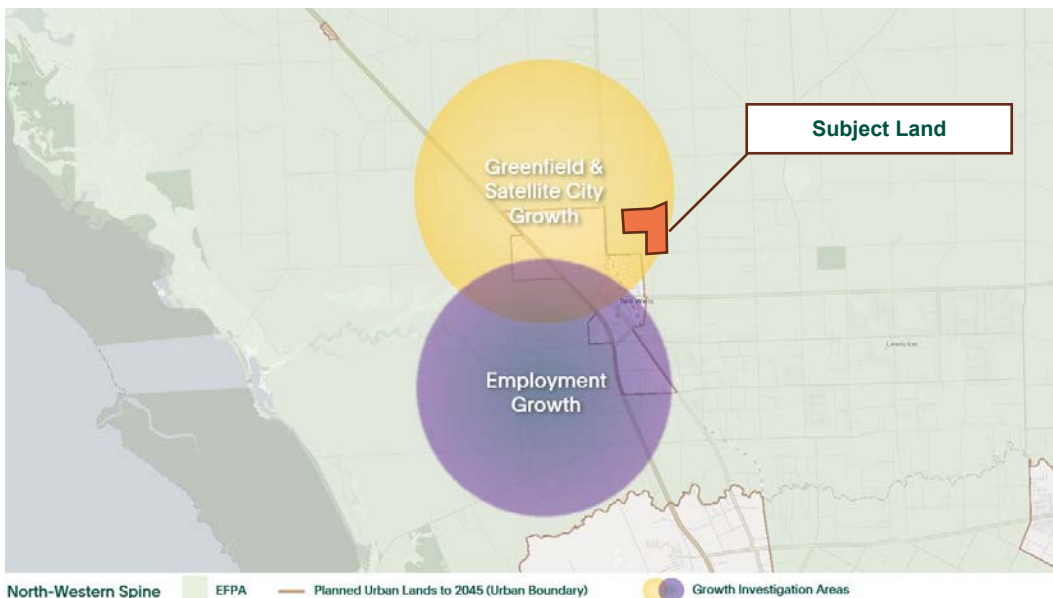


Figure 4.1: Two Wells Growth Investigation Areas

The land is currently underutilised for low intensity cropping and grazing purposes only. Finally, as a large, consolidated site, which is under single management and control by Grange Development, the land in question is highly conducive to future urban growth.

4.2. Capacity for Growth

Referencing State Planning Policy 6 – Housing Supply and Diversity, the Discussion Paper acknowledges the need to “ensure land supply responds to future demand, as informed by population projections and demographic trends” and to “provide a range of well-designed, diverse, and affordable housing options across the region”.

Assuming a yield of 12.5 dwellings per hectare (gross) and noting the existing land area of 105.16 hectares, the subject land could yield in the order of approximately 1,310 dwellings. Assuming 60% of the land is used for residential purposes,

and the balance of land is used for non-residential purposes (roads 25%, open space 12.5%, utilities and stormwater 2.5%) this would equate to a nett density of 20.6 dwellings per hectare, with an average lot size of 485 sqm.

Based on a limited 'desktop' assessment of the site (and setting aside the current EFPA boundary), we are of the opinion that the site would have limited constraints that would prevent future development achieving this dwelling yield given:

- Development sequencing: The land is adjacent the existing Eden Two Wells estate, which has recently sold out and now well progressed through to delivery of its final stage;
- Corridor Location – the subject land is located within Two Wells which is located along the 'North-Western Spine' identified within the Discussion Paper;
- Topography – The land is largely flat, with the opportunity for a careful engineered solution to balance cut and fill with the delivery of required stormwater infrastructure;
- Native vegetation – the site has been predominantly cleared of vegetation and is being used for low intensity grazing and cropping. The single mature tree could likely be retained and accommodated in any future development of the subject land;
- Flooding – the current Hazards (Flooding) and Hazards (Flooding – General) Overlay areas over the subject site could be suitably mitigated through an engineered response in a future development of the subject site, including possible incorporation of any required stormwater conveyance and detention in future open space reserves and corridors; and
- Cultural Heritage – As a large, consolidated land holding, the opportunity exists to undertake a 'Cultural Heritage Management Plan' to assess the potential impact of a proposed activity on Aboriginal cultural heritage including measures to be taken before, during and after an activity in order to manage and protect Aboriginal cultural heritage in the activity area.

Notwithstanding the site is free from creeks and other waterbodies, as well as elevations within the topography, which are considered more likely to comprise areas of cultural sensitivity.

- Consolidated Land Ownership – The land is under the sole management and control of Grange Development which enables the coordinated and sequential development of the land as well as reduce complexity in the negotiation and coordination of infrastructure delivery for the future growth area;
- Heritage – There are no State or local Heritage Places on the subject land.

Through an appropriate infrastructure funding mechanism, the staged delivery of necessary infrastructure will coincide with continued logical growth of the subject land.

4.3. Service Infrastructure

Given the context of the subject land's proximity at the edge of new urban development, and directly adjacent the Eden Two Wells estate, the land will have adequate infrastructure capacity and augmentation capability.

The site's proximity to established residential housing developments is also aligned with the Commission's desire to focus new development where established infrastructure exists and where investment in new or upgraded infrastructure is proposed:

“The capacity of infrastructure to support growth varies across locations. Focusing new growth in locations with existing services and facilities is the best option. Doing so also benefits the broader community by reducing the cost of new transport, education and health care, and new trunk infrastructure for water, sewer and electricity.” (Pg. 92)

4.4. Social & Community Infrastructure

The subject land is well situated within Two Wells, and located less than 2km to the existing and future expanded Two Wells town centre. The land will also benefit from convenient access to other facilities and services such as:

- Various educational and community facilities including Xavier College (reception to Year 9), Two Wells Primary School Two Wells Community Children’s Centre, and Two Wells Uniting Church
- Shopping centres and other services such as Two Wells Main Street Precinct (and future Two Wells Town Centre), Two Wells Medical Clinic and Two Wells Service Centre & Library
- Walking and cycling trails both existing and proposed, such as those envisaged through Adelaide Plains Council’s ‘Two Wells Walking And Cycling Plan 2023’. Similar to the GARP Discussion Paper, this Plan also identified the subject land and surrounds as a logical growth future walking and cycling infrastructure as demonstrated in **Figure 4.2** below:

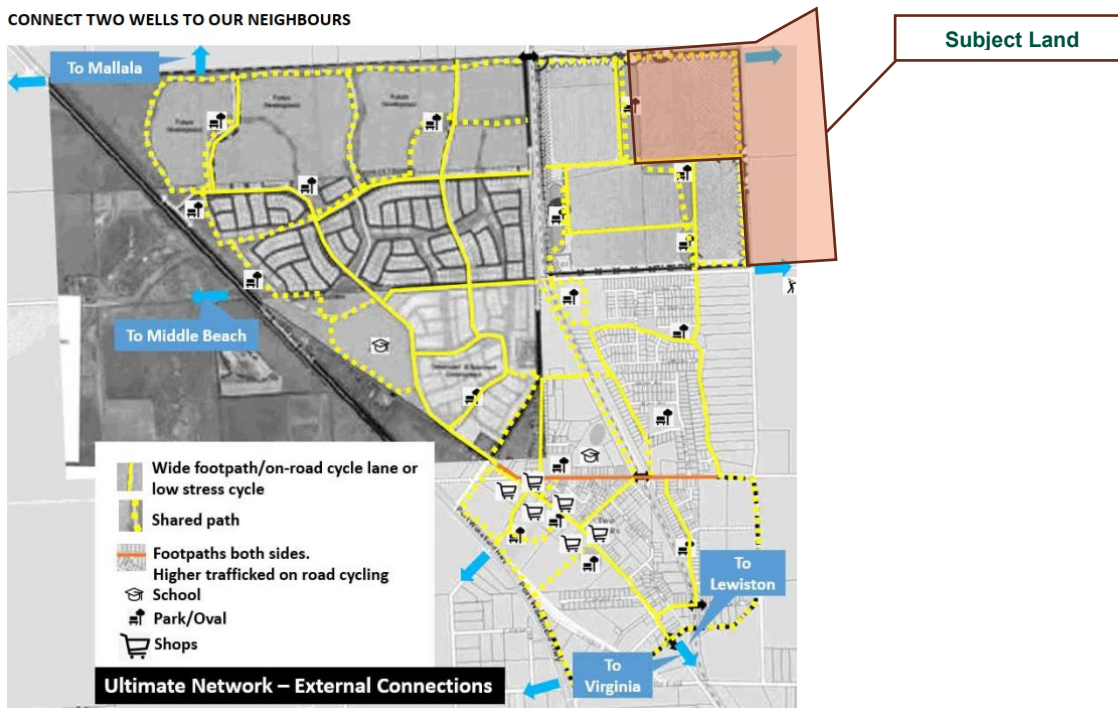


Figure 4.2 – Future Walking & Cycling Network (Source: ‘Two Wells Walking And Cycling Plan, 2023’– Adelaide Plains Council, March 2023)

4.5. Propensity for Development

The land is under the single management and control by Grange Development who strongly support:

- The identification of the subject land as a future urban growth area;
- The removal of the Environment & Food Production Area (EFPA) from the subject land;
- The immediate initiation of a Code Amendment to establish appropriate zoning for commercial and residential development,

The subject site therefore has a strong propensity for future development and delivery to market should it be identified as a future urban growth area to contribute to the supply of affordable housing across Greater Adelaide.

Grange Development have a strong track record of delivering high quality developments throughout Australia, including large broadacre greenfield development. This extensive experience will enhance diversity in housing options and facilitate an increased competitive market for future residents of Two Wells.

5. CONCLUSION

This submission is provided to assist the State Planning Commission's with its preparation of the Greater Adelaide Regional Plan.

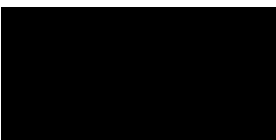
We are of the opinion that the subject land represents a significant opportunity for the future expansion of the Two Wells Township. This view is reinforced through the Greater Adelaide Regional Plan Discussion Paper, which has designated the subject land as a Growth Investigation Area to meet the future land supply needs for Greater Adelaide.

Based on a preliminary 'desktop' analysis, the subject site does not have any likely constraints that would prevent or inhibit future urban development and is under the control of a single entity to enable a coordinated approach and delivery of future housing in a master planned community. This is however contingent upon the EFPA being removed from the subject site.

Grange Development therefore request that the subject site is identified as a 'Future Urban Growth' area in the next iteration of the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years) for residential lands.

Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

Yours sincerely,



Ryan Moyle
Senior Associate

DTI:PlanSA Submissions

From: Ashley Watson [REDACTED]
Sent: Monday, 6 November 2023 3:40 PM
To: DTI:PlanSA Submissions
Cc: [REDACTED]; Seal, Steve (Marleston) AUS
Subject: Greater Adelaide Regional Plan Discussion Paper - submission of Hanson Construction Materials Pty Ltd [445847] [PA-A.FID1219192]
Attachments: 4147_001.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

The attached submission to the Greater Adelaide Regional Plan Discussion Paper is provided on behalf of Hanson Construction Materials Pty Ltd.

We look forward to feedback / discussion in respect of the matters it raises.

Could you please confirm receipt?

Kind regards

Ashley Watson
Partner

[REDACTED]

W: piperalderman.com.au W: [View My Profile](#)



SUBMISSION BY HANSON CONSTRUCTION MATERIALS PTY LTD
TO
GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

1. Introduction

This Submission is to the "*Greater Adelaide Regional Plan Discussion Paper*" (**Discussion Paper**) on behalf of Hanson Construction Materials Pty Ltd (**Hanson**) of 55 Galway Avenue, Marleston South Australia.

Hanson is part of the Heidelberg Cement Group, a leading global company in the supply of high quality concrete aggregates, sand and related products to civil construction and infrastructure projects. It employs over 59,000 people across five continents. In Australia, Hanson operates from 259 different sites, 30 of which are located in South Australia.

Inherent in Hanson's capacity to service its market, is the ability to extract sand and aggregates from naturally occurring locations in proximity to areas where construction and infrastructure demand can be expected. These sites are typically large in area and held for long periods until the resources within them are exhausted. In South Australia, Hanson's primary resource locations are at Maslin Beach (sand), Golden Grove (sand), Whiterock (aggregates), Rowland Flat (sand) and Kanmantoo (aggregates).

2. Greater Adelaide Regional Plan Discussion Paper

In South Australia, the State Planning Commission has published the Discussion Paper and invited submissions from community and industry on its contents.

The Discussion Paper is underpinned by the fact that since 2011, the Greater Adelaide Regional Area has welcomed some 167,000 new residents, but current projections identify that by 2051, an additional 670,000 residents could be expected and planning and decision making must be undertaken to accommodate such growth.

The Discussion Paper notes the land supply projections for residential land across metropolitan Adelaide indicate there is approximately 15 years of land supply currently available and the State Planning Commission has the role of ensuring an adequate supply of residential and related land through to 2050 and beyond.

To this end, the State Planning Commission has identified within the "*Greater Adelaide Planning Region*" what might comprise "*Planned Urban Lands (2045)*" identified in the map at page 21 of the Discussion Paper.

Within that region, the State Planning Commission is proposing four directions of growth outside of, or on the fringe of metropolitan Adelaide, for future housing and employment. These areas extend along Adelaide's major transport spines to the south, northwest, northeast and east, identified as "*Key Transport Corridors*".

3. Hanson Interest

Of particular interest to Hanson, is that within the Greater Adelaide Planning Region, Hanson owns and operates areas for sand extraction at Golden Grove to the northeast and Maslin

Beach to the south. These are the largest reserves of sand servicing the Adelaide, metropolitan and regional market.

At Golden Grove, Hanson produces sand for the Adelaide market and clays (servicing local brickmaking operations). While Hanson has the largest operations at Golden Grove, other companies also operate in the Golden Grove extraction zone which comprises an area of some 340 hectares. The Golden Grove extraction zone has an estimated life span for extractive activity of some 50 years which takes it outside the current scope of the Discussion Paper. However, such lifespans are subject to change due to a variety of factors, in particular future demand. It might be noted as part of the Discussion Paper process, at some point in time, that area will become wholly or partly available for residential and related forms of land development.

At Maslin Beach, Hanson owns, controls and operates from an area immediately abutting the Seaford Rise residential development (south of Pedler Creek Reserve) to the north, South Road to the east, Sherriff Road to the south and Old Coach Road/Commercial Road to the west. The Hanson land is bisected by Maslin Beach Road in an east/west direction so that approximately one third of the Hanson land sits north of Maslin Beach Road and two thirds to the south. **Attached** is an indicative map identifying the size and location of the Hanson Maslin Beach land.

Except for a mounded buffer area located to the north of the Hanson site and immediately abutting the Seaford Rise development, and other areas to the south to meet offsets for "exempt land" under the Mining Act, sand is extracted across the whole of the Hanson area. The infrastructure relating to the operation is located wholly on the portion of the site south of Maslin Beach Road.

The site area overall represents approximately 195 hectares in total, with approximately 70 hectares north of Maslin Beach Road and 125 hectares to the south.

At its current rate of extraction of the sand resource, Hanson expects the area to the north of Maslin Beach Road could be depleted within approximately 8 to 10 years, with the area to the south continuing for up to another 36 years (assuming no future increase in demand from current rates of extraction).

4. Hanson Land for Future Development

It is submitted the Hanson Maslin Beach land is ideally located for identification by the State Planning Commission as a future development site within the context of the Discussion Paper.

Unfortunately, the scale and detail of the maps contained within the Discussion Paper (eg. at p21 and p141) are such that it is not possible to be definitive whether the land is currently regarded as within the bounds of the "*Planned Urban Lands 2045*". Attempts to obtain a more accurate map from the State Planning Commission were not successful within the time allowed for submissions, but it is clear the land, if not within that area, is immediately abutting it with South Road forming the eastern boundary. If the land is not currently considered within this area, it is submitted a minor adjustment to the boundary should be made to accommodate the area.

For at least the following reasons, Hanson submit this land area should be included for consideration as part of the Development Area contemplated by the Discussion Paper:

- The Hanson Maslin Beach land presents ideally as a large, strategically placed site readily able to be integrated into and meeting all of the priorities and directions proposed by the Discussion Paper.
- While not entirely representing a natural land form, sand mining is a superficial process extending across a wide surface area, leaving a relatively flat land form, easily capable of being modified (or designed as part of the extraction process) to suit the natural context and the needs of residential type development at relatively low cost. Most bulk land development earthworks would be completed post extraction, ready for final trim, road construction and services, expediting the land development process.
- The structure of the land as a whole, with its division by Maslin Beach Road, readily enables development of the site to be undertaken in two stages with the northern site to be the first. At present, the northern site area is separated from the Seaford Rise residential development to the north by a large mounded buffer area. This buffer area is part of the land owned by Hanson and if the northern area of the Hanson land were to be developed on its own, the buffer would be removed and appropriately relocated (or substituted for) to the south in a manner that would protect new development from any implications arising from continuing extractive operations to the south.
- The site, to the north, is without any introduced environmental implications. To the south there are two silt dams arising from the Hanson operations. These can be readily remediated before land in that section becomes available for development. Hanson is nationally, a leader in developing methodologies to geotechnically secure silt dams at its operations.
- The Hanson land is not constrained by any other form of development. It directly abuts the Seaford Rise development to the north and, across Commercial Road/Old Coach Road to the east, it abuts southern parts of the Moana residential areas with its seafront access.
- The land is directly serviced by and has easy established access from South Road and it has been contemplated to directly abut a planned extension of the recently established rail line to Seaford. It could not be better serviced by "*Key Transport Corridors*" comprising existing and proposed transport infrastructure.
- It is noted that the State Government is undertaking a Master Planned Code Amendment to create 1,700 allotments at Sellicks Beach (see map at page 107 of the Discussion Paper), within an area of 130 hectares. The Hanson Maslin Beach land, while not immediately available, is closer to the city than the Sellicks Beach proposed development and better located for access and services.
- The Hanson land sits readily on the proposed southern spine (see page 116 of the Discussion Paper) and meets all of the criteria for "*urban infill growth*" (pages 127 and 128 of the Discussion Paper).

5. Conclusion

Hanson's submission is that the Discussion Paper provides an immediate opportunity to identify their Maslin Beach land as available and appropriate to sub-divide in the future as part of the responsible growth of the Greater Adelaide Region for future generations. Hanson invite further discussion and involvement in the conversations that will result from the Discussion Paper.

This submission is made by Piper Alderman lawyers, on behalf of Hanson Construction Materials.

Contact details are as follows:

Ashley Watson
Partner
Piper Alderman
Level 16, 70 Franklin Street
ADELAIDE SA 5000

[REDACTED] u
[REDACTED]
[REDACTED]

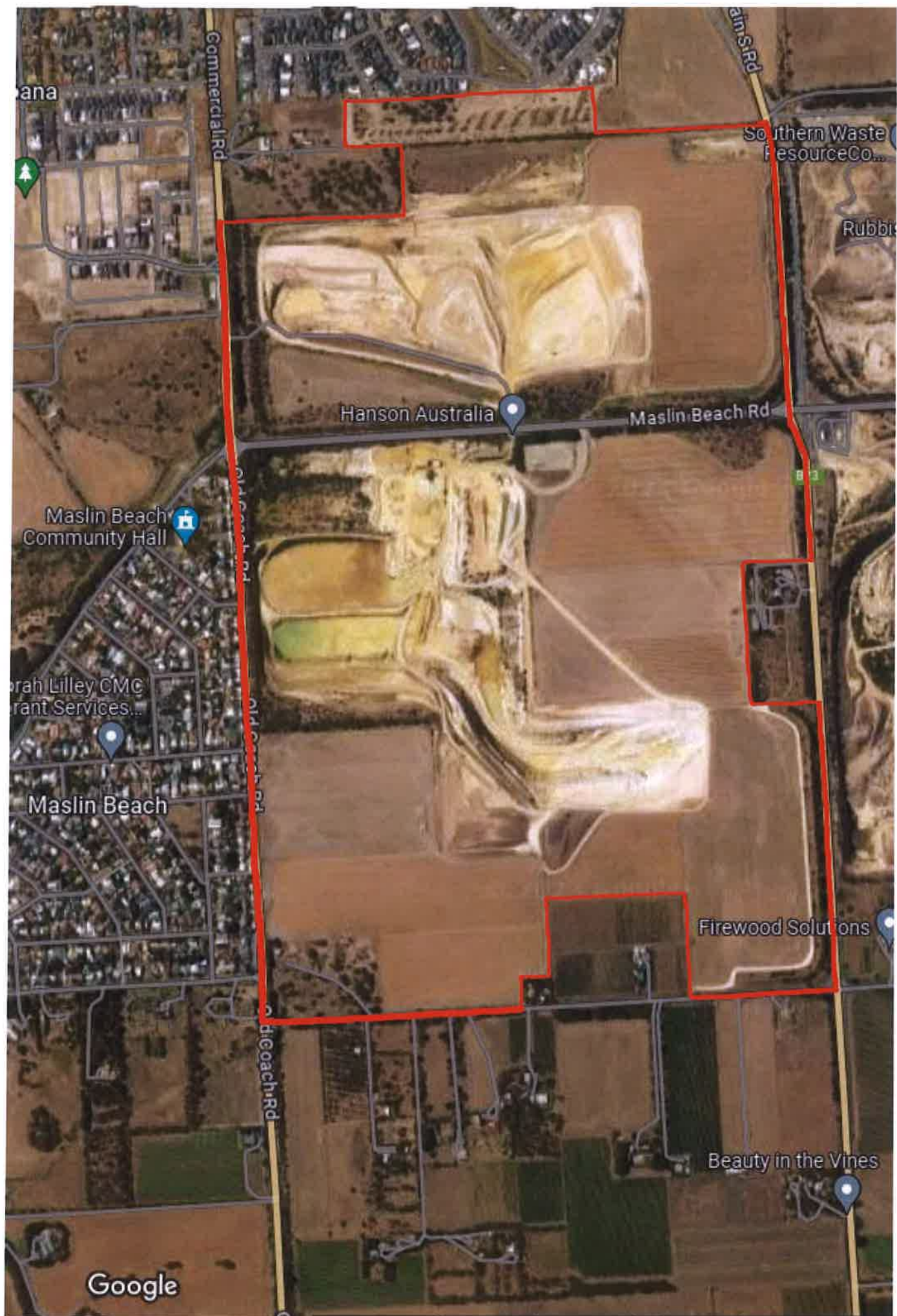
cc.
Steve Seal
Supply Chain Aggregates
Hanson Construction Materials Pty Ltd
and

Vern Newton
National Property Manager
Hanson Construction Materials Pty Ltd

Dated: 6 November 2023

[REDACTED]

Piper Alderman



DTI:PlanSA Submissions

From: Sarah Louise Hunter [REDACTED]
Sent: Monday, 6 November 2023 5:01 PM
To: DTI:PlanSA Submissions
Cc: Michael Hickinbotham
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper | Hickinbotham
Attachments: HICK2023-39.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir/Madam

On behalf of Hickinbotham Group Managing Director, Michael Hickinbotham, I provide the attached 'Submission – Greater Adelaide Regional Plan Discussion Paper'.

Kind regards

Sarah Hunter
Executive Assistant to Michael Hickinbotham
Hickinbotham Group

25 North Terrace, Hackney SA 5069
PO Box 63, Stepney SA 5069

[REDACTED]
Web: www.hickinbotham.com.au

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HICK2023-39.docx

6 November 2023

By Email: plansasubmissions@sa.gov.au**Submission – Greater Adelaide Regional Plan Discussion Paper**

Please accept the following submission in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper.

Summary

The housing crisis in South Australia, characterised by unaffordable housing, is an urgent issue that requires immediate action. The median house price in metropolitan Adelaide has exceeded \$700,000, making it one of the least affordable housing markets—not just in Australia but globally. The Discussion Paper acknowledges the demand for affordable housing in Greater Adelaide but surprisingly suggests no urgency to change the current supply and delivery of housing for the next 15 years.

Factors influencing housing affordability and demand include changing economic circumstances, population growth, household composition, interest rates, taxation, investor demand, and construction costs. However, the paper overlooks the impact of artificial constraints imposed by the legislated urban growth boundary and the lengthy process of rezoning land for residential housing, which can take up to a decade.

The recent land releases by the South Australian Government offer hope for younger families and newcomers to the state. Still, they will not meet the demand, nor the Commonwealth Government's announced target for additional homes. Land supply is a significant economic challenge for both state and federal governments.

The solution we propose is a balanced 50:50 split between infill and greenfield development, with a focus on expanding growth areas in the northern region of Greater Adelaide. If South Australia and Adelaide are to regain their competitive advantage over other states and their capital cities, housing choice needs to be market driven. Fast-tracking rezoning and land approvals can alleviate pricing pressures, enhance affordability, provide housing options, and stimulate the construction industry, contributing to economic growth.

Further, Roseworthy Garden, a shovel-ready community development, presents a viable solution to the housing crisis. It offers an opportunity to create a self-sustaining, prosperous satellite community within Greater Adelaide, providing attractive housing that is affordable and also supports nearby industries and tourism. The expansion would contribute significantly to economic growth, generating jobs and enhancing the local economy.

The housing crisis in South Australia requires immediate attention. A balanced approach to development, a focus on expanding growth areas, and shovel-ready solutions, such as Roseworthy Garden, are crucial to addressing the current housing availability and affordability crisis, creating jobs, and stimulating economic growth.

Introduction

At Hickinbotham, with our industry knowledge and longevity as South Australia's longest-established and largest residential building and land development company—celebrating our 70th anniversary in 2024—we welcome the opportunity to share our insights on some key issues and directions outlined in the Discussion Paper.

Hickinbotham is in an unmatched position to assist with improving housing affordability in this state. Every day, we are at the coalface, delivering large-scale, high-quality and affordable homes to South Australians. We're well capitalised with a proven ability to deliver large-scale residential communities. We are committed to this state and helping South Australia efficiently build communities that provide sustainable housing that is affordable and employment opportunities to enable families to thrive.

The four outcomes identified to shape the discussion about how Greater Adelaide should grow—*A greener, wilder and climate resilient environment; a more equitable and socially cohesive place; a strong economy built on a smarter, cleaner and regenerative future; and a greater choice of housing in the right places*—are commendable aspirations that consider the major global trends and drivers of change. Of the four, we most welcome the last and the acknowledgement that Greater Adelaide needs to identify housing and employment lands, as well as recognition of the role of satellite townships in the region and that not everyone wants to live between Gepps Cross and Darlington.

We also suggest an additional outcome that recognises the emergence in Australia since COVID of a desire for “lifestyle zones”, which reflect the growing diversity of our cities and the desire of people to live in areas that align with their values and lifestyle aspirations.

Key drivers to achieve GARP's outcomes will be thoughtful long-term planning, a willingness to invest and a preparedness to innovate.

‘We need more homes’ (GARP Discussion Paper page 8)

It is uncontroversial that the availability of housing that is affordable in South Australia is at crisis levels (as it is throughout most of the country) and that there is an urgent need for action.

Housing has become increasingly unaffordable for many South Australian families, driven by the highest escalation of land prices and house values in the shortest period in our history. The median house price in metropolitan Adelaide has now topped more than \$700,000 (June 2023).

Adelaide went from being Australia's most affordable (mainland) housing market in 1981 to the third least affordable market after Melbourne and Sydney in 2023.

Adelaide's median multiple (the median house price divided by the median annual household income) has gone from 3 times the average household income to 8.5 times in that period.

We are more unaffordable than our closest competitor cities of Brisbane and Perth. Globally, we are ranked the 10th most unaffordable city for housing out of more than 2 million metropolitan areas worldwide.

In South Australia, 80% of metropolitan Adelaide households with a 10% deposit cannot afford to buy a median-priced metropolitan Adelaide house.

As house prices have risen far faster than inflation, young households are unable to afford the houses they grew up in, the houses where they aspire to live, or the houses near where they work. There is considerable concern that the standard of living for our young is declining after more than a century of economic growth that made Australia's quality of life the envy of the world. Notably, the cost escalation of housing is unique. The cost of other household essentials such as cars, food and clothing has not increased anything like the cost of housing.

While the Discussion Paper acknowledges there is currently a demand for affordable housing in Greater Adelaide, it takes the curious position that there is no urgency to change anything about the current supply and delivery of housing in this state for the next 15 years. The Discussion Paper repeatedly states that the region has an adequate supply of zoned residential land (page 9), ensuring enough homes will be built to meet the current demand (pages 106-107), and the future focus should shift to 16+ years. We respectfully remain entirely unconvinced of the data on which that reasoning is based.

Factors fuelling housing demand and influencing housing affordability in Adelaide are listed in GARP as changing economic circumstances, population growth, household composition, interest rates, taxation, investor demand and construction costs (page 9).

It appears the Discussion Paper completely ignores the impact on housing affordability and availability from the artificial constraint caused by the introduction of the legislated urban growth boundary (the Environment Food Production Area) and the time it still takes to rezone land for residential housing.

Our experience is that it can take more than four years (approximately 1460 days) minimum and up to 10 years for a homeowner to put the keys in the front door of their new home from when the land rezoning is first initiated.

During that time, the structure planning, infrastructure analysis, Code Amendment (initiation, investigation, engagement, approval) and land division application (engineering negotiations, detailed design to inform land division assessment) account for up to three years at least. The actual construction of the new dwelling is typically completed in approximately nine months, with the remainder consumed by engineering design/approval, civil construction and dwelling approvals.

‘Where should Greater Adelaide grow?’ (GARP Discussion Paper p100)

The recent land releases announced by the South Australian Government offer hope for younger families and the anticipated new wave of migrants to this state, who will be needed to help implement the state's infrastructure agenda in defence, transport, desalination and hydrogen.

But the provision of affordable land in a timely manner is critical to the South Australian Government achieving its economic growth targets.

Land targeted for housing in Greater Adelaide must be shovel-ready far sooner if the industry is to deliver on the initiatives of the Commonwealth and State Governments.

While the South Australian Government's decision, in response to the land supply shortage, was to trigger the process for releasing 23,700 residential allotments to the market, the region now faces a lengthy wait until that land actually makes it to market.

The 20,000 allotments earmarked for Concordia and Dry Creek may take up to a decade if not longer at Dry Creek, to become available for families to make their home.

Regardless, the 23,700 figure would cover just 18 months of housing supply under South Australia's per capita share of the Federal Government's additional homes target of 1.2 million over five years.

The Housing Industry Association has estimated that, based on South Australia's per capita share, this equates to approximately 80,000 homes over that 5-year period, requiring 16,000 homes to be built annually to meet the target.

Historically, South Australia has averaged between 9,000 and 12,000 homes each year, with a mix of detached houses, townhouses and apartment developments. Detached homes account for most of these dwellings, between 7,000 and 9,000 per year, over the past 30 years.

For South Australia to meet the proposed target will require several thousand additional homes annually (over and above historical averages and current rates). This will require land being made available in significantly larger quantities and in accelerated time frames than what is currently being envisaged in the Discussion Paper. The GARP Discussion Paper's forecast of 300,000 additional homes over a 30-year period appears to be significantly under-estimated if 80,000 homes are required in the first five years.

Land supply is one of the most significant economic and socio-economic challenges facing our community and both State and Commonwealth governments in Australia right now. As stated in the Discussion Paper, the release of serviced land in strategic areas is fundamental to redressing our current housing availability and affordability crisis.

It is an uncontroversial fact that there is nowhere near enough land available inside the urban growth boundary, or proposed in the Discussion Paper, to enable delivery of these homes.

As mentioned in the Discussion Paper, we believe this supply issue could be solved with a more balanced infill-to-greenfield split. We submit that a 50:50 split will provide South Australian families with a greater choice of housing style and location and will, importantly, take the pressure off land pricing.

Key northern growth areas (which are serviced by the Little Para dam network), such as Riverlea, Munno Para, Two Wells, Angle Vale, Roseworthy and Gawler, provide a limited source of affordable new family homes. An expansion of the rate of development in those growth areas is critical to addressing the current land supply crisis.

Increasing the supply of housing through fast-tracking rezoning and land approvals will help alleviate price pressures, address affordability, offer greater choice in housing and create jobs in the construction industry, boosting the economy.

Housing affordability is a competitive economic strategy for governments and an important contributor to regional economic development (outside metropolitan areas).

In South Australia, every \$100 million of residential development in new housing construction supports more than 700 full-time jobs and more than \$100 million in Gross State Product (salaries, wages, profits, etc).

How can greenfield development achieve an urban form that is consistent with the principles of Living Locally? (GARP Discussion Paper p115)

It's one thing to build a home, it's another to support the evolution and growth of a community.

At Hickinbotham, we have a track record of demonstrating that from the commencement of any master planning process, we recognise the importance of fostering a partnership with relevant local councils and the existing community to deliver improved social, environmental and economic outcomes - especially job creation and investment. This is the process we have followed successfully at Two Wells and Roseworthy.

Noted demographer Bernard Salt has written and spoken about the demographic shifts occurring in cities such as Melbourne and Adelaide due to the pandemic.

Salt says, and the ABS statistics show, there's been an exodus from inner-cities and suburbs to lifestyle zones - a trend that 20 years ago we called sea change and tree change. Salt wrote on November 5, 2022, in *The Australian*: "Australian suburbia is a work in progress, and always has been. It adapts to our changing needs and preferences. And the interesting thing isn't so much the way things have changed, but how our households and communities project our prevailing values and social behaviour on the world around us." The Discussion Paper acknowledges this (p11): **"More people increasingly able to work from home, are moving to Greater Adelaide's idyllic regional centres and towns. So, we will also need to provide new housing and business services in our regional centres to meet this demand."**

COVID has fundamentally changed our understanding of population distributions, and these effects will continue for decades.

Millennials are ageing—they're now aged 26 to 41—and a lifestyle home is important to them. They want space, room inside and outside for their entertainment, technology, zoom rooms, pizza ovens, home gyms and swimming pools. Since COVID and thanks to the NBN and broadband access, Millennials and the next generation, Gen Z, value working from home and now view daily commuting as human wastage with widespread consciousness about carbon emissions and general anxiety associated with regular commuting.

These prevailing values and behaviours Salt refers to are reflected at Two Wells, where we have subdivided generous block sizes in a beautifully landscaped environment that pays homage to the local rural landscape and historic Two Wells township.

Two Wells is now one of the youngest, most affordable and fastest-growing urban regions in Adelaide—a vibrant community with active schools, childcare, recreation choices, local jobs and main street shopping.

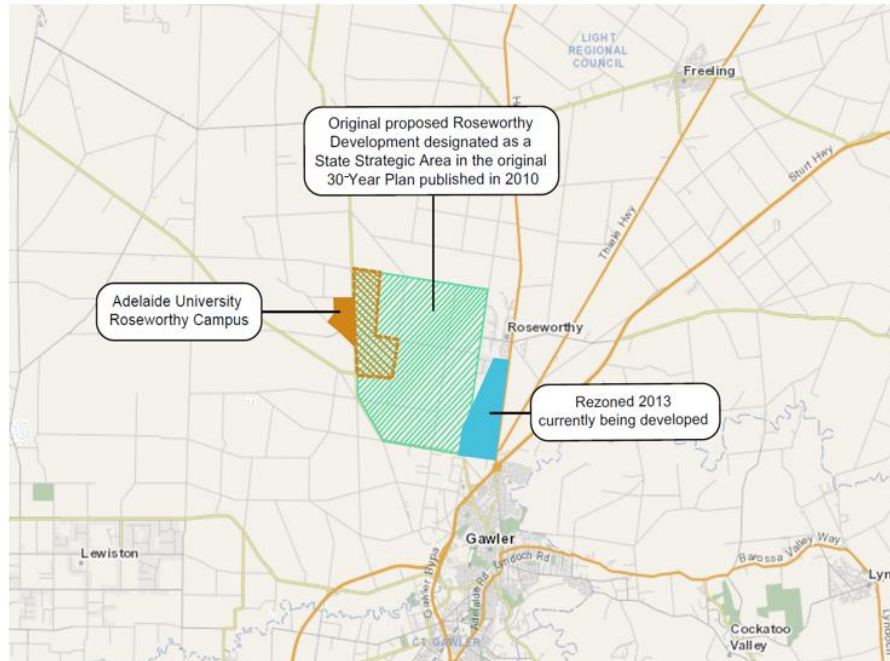
Everything about Two Wells fulfils the GARP's four outcomes, as well as the concept of 'living locally', also promoted in the Discussion Paper.

With a development life of 20 years, the total investment in Two Wells will exceed \$1.2 billion, with 9,500 FTE new jobs based in the northern Adelaide region.

Our subdivisions at Eden and Liberty are now home to more than 400 families, and demand from families for more housing is high. Two Wells is the perfect example of lifestyle-driven growth and reflects a region successfully looking outward rather than inward.

The success of our Two Wells community is quintessentially told through the story of the Two Wells bakery. It has gone from 2 employees to 24, from 40 customers a day to 600. They sell 6,000 pies and pasties a week with 3,000 coffees, this is great for the local economy.

Roseworthy Garden, a shovel-ready solution



- A shovel-ready solution to the housing crisis
- The first tranche (the only area within the Urban Growth Boundary) was rezoned in 2013
- We are now developing the first six stages
- Unprecedented demand
- Infrastructure is in place and can be extended - infrastructure deeds in place
- Roseworthy is strongly supported by the community and the Light Regional Council
- The University of Adelaide is our partner and signed an MOU in 2009

As far back as 1985, the advantages and strategic position of Roseworthy as a major growth corridor with a capacity for more than 100,000 and a population of 30,000 by 2001 were identified in the Kinhill Stearns report, *Evaluation of Long-Term Development Options for Metropolitan Adelaide* for the Department of Environment and Planning. While the timing was out, the fundamentals underpinning this vision were reinforced in 2010's *30-Year Plan for Greater Adelaide*, which designated Roseworthy as the only "state strategic area". Those fundamentals remain just as apparent today.

Roseworthy Garden (note this is a larger proposed area than the current Roseworthy Township Expansion, refer to map above) is our vision for a world-class community featuring the best in master planning, high quality, affordable housing, water-sensitive design, landscaping, lush green spaces and recreation areas where children can learn through play—together with shopping, dining, schools, health services, employment precincts and the Roseworthy Campus of the University of Adelaide.

Roseworthy Garden would be a prominent satellite community—the essence of 'living locally'—where families can live, work and play locally whilst maintaining a connection to Adelaide's CBD via the existing major road and transport corridors. It would cover the area between the rail line to the east and the University of Adelaide's campus to the west.

As GARP states on page 114: "Satellite cities play an important role in managing growth in a metropolitan region by offering more affordable housing options while retaining the benefits of a highly liveable urban centre. Planned growth in satellite cities can make the most of the physical, social and economic infrastructure already available and allow strategic investments to be made over time to support a growing community."

Importantly, Roseworthy Garden would not impact in any way on the Barossa Character Protection Zone. In fact, the Barossa area desperately needs Roseworthy Garden to proceed because it will provide employment opportunities and generally bolster those industries and services ancillary and complementary to the viticulture and with industries. Most significantly, it will provide much-needed affordable housing for regional workers.

In 2012, the State Government revised the strategic importance of Roseworthy; the Environment and Food Production Area followed in 2016, segregating the majority of the area proposed for the original Roseworthy Garden project outside the urban growth boundary.

Earlier this year, Hickinbotham commenced the development of the first stage of a scaled-back Roseworthy expansion, called the Roseworthy Township Expansion (RTE) between the Horrocks Highway and the rail line, with the current Roseworthy township to the north and Gawler to the south.

It is nine years since this area was rezoned.

Unsurprisingly demand for residential allotments within the RTE has been intense with demand outstripping supply.

In 18 months, we sold 220 homes within the RTE with nearly 100 families on a waiting list for the next release.

As a master-planned development, Roseworthy Garden could, subject to removing the impediment of the urban growth boundary, be added to the South Australian Government's already announced land releases, as a hedge against time and logistical constraints, as well as the anticipated demand.

Roseworthy Garden - an economic driver

Leading economists, Hudson Howells, has updated its economic assumptions (commissioned in 2009) for the original Roseworthy Garden Town project. Based on these assumptions and an estimated 40-year life span for the project, Roseworthy Garden would deliver the following economic benefits:

- Number of Allotments: 23,500
- Infrastructure Cost per Allotment: \$60,000 (paid for by the developer)
- Retail Area: 141,750 m²
- Bulky Goods Area: 86,250 m²
- Education Area: 25,000 m² (private schools)
- Commercial/Office Area: 230,000 m²
- Light Industry/Services Area: 1,164,400 m²

This equates to:

- Total Investment - \$14.6 billion

Over 40 years, Roseworthy Garden's construction would contribute:

- \$15.4 billion to Gross State Product. An average of \$385 million per annum.
- 99,000 Full-Time Equivalent Jobs. An average of 2,475 per annum.

Operational Employment Estimates:

- After 40 years, the town would support 88,300 full-time equivalent jobs, including 31,800 direct and 56,500 indirect (or multiplier) jobs in retail, bulky goods, education, commercial and light industry sectors. An average increase of 2,200 jobs per annum.

Why Roseworthy Garden?

Roseworthy Garden ticks all the boxes for a sustainable, desirable, productive and prosperous world-class satellite community within Greater Adelaide. It presents a considerable opportunity for combining employment, education, business, lifestyle and cultural diversity. It would deliver ‘living locally’ in spades.

The proposed expansion reflects the need for residential and commercial zones to support and service the nearby viticulture and tourism sectors. The many small, medium and even large-scale enterprises that have invested in the Barossa and Adelaide Plains regions need workforces, and these workers and their families desperately need somewhere attractive and affordable nearby to live, whether it's owning or renting.

Roseworthy Garden is a shovel-ready, clean canvas that is ripe for the development of a contemporary, self-sustaining 21st-century town. The advantages of the Roseworthy Garden Project are as follows:

- geotechnically stable, unconstrained environmentally with topography suitable for the development of more than 23,000 houses;
- easy to service with water, power, gas and sewerage;
- builds on significant investment in road infrastructure—located on the national highway and directly linked to the Northern Expressway;
- has an existing rail line—allowing a future connection to the metropolitan network;
- on the doorstep of Adelaide’s economic engine room of the north—connected to the Barossa, the Upper Spencer Gulf (future base of hydrogen and Northern Water projects) and defence zones of Edinburgh Parks and Osborne;
- neighbours the Kingsford Regional Industrial Estate;
- home to the University of Adelaide Roseworthy campus, the major centre for South Australia’s animal and veterinary science research. With the upcoming merger of the University of Adelaide and UniSA, Roseworthy’s strategic importance to northern Adelaide will only increase;
- a supportive surrounding community, heavily involved in the extensive earlier planning process; and
- experienced local government, Light Regional Council, which has demonstrated it can successfully manage sustainable growth.

The heavy lifting to deliver Roseworthy Garden has already been done.

Light Regional Council and the local community remain very supportive of developing Roseworthy with extensive consultation and engagement having been undertaken over many years. Light Regional Council resolved to support the original Roseworthy Garden Town project more than 12 years ago. A masterplan already exists for the area, one that was created via a collaborative and iterative process over a long period of time, through a series of community town hall meetings and charettes, which canvassed the ideas of the community.

An international study tour of the very best and most successful urban developments around the world was conducted, including Garden Towns in Britain and the “Smart Growth” communities of the United States. An alliance of key stakeholders in the region was established. Light Regional Council engaged Emeritus Professor Dennis Hardy, a world leader in urban design based in the UK, to advise the council and critique the master plans that were developed during this process.

Hickinbotham has also maintained strong, long-term strategic partnerships with Light Regional Council, the University of Adelaide, HomeStart and the Catholic Education Commission, which will underpin the eventual success of Roseworthy Garden.

Ready solutions have been identified and are available for the natural extension of the existing infrastructure (including national highway and road infrastructure) to service Roseworthy Garden, which can be implemented and managed by enabling deeds, such as those already successfully occurring within the current residential development RTE.

Roseworthy Garden is an obvious and shovel-ready solution to South Australia’s housing availability and affordability crisis. This immediate and planned increase in land supply would quickly address the region’s current housing availability, affordability and rental crisis.

Rebalancing the housing choice across the region would reverse some of the consequences we have experienced in the past decade with rapidly escalating house prices for both new and established homes, low rental vacancy rates and escalating rents, decreasing home ownership and increasing homelessness, concerns about the impacts on attracting skilled migrants, and growing wealth inequality.

Infrastructure

We welcome the creation of the Housing Infrastructure Planning & Development Unit and the recognition of the critical part infrastructure plays in driving economic growth when coupled with the planning and delivery of residential-zoned land.

The Discussion Paper references the need to factor in or consider new and extended infrastructure in relation to both greenfield and infill housing.

The Unit should, therefore, have a major positive impact by unlocking challenging housing development projects in circumstances where the private market has been unable to do so using existing methods. In particular, the Unit’s resources would be most usefully deployed by focussing on difficult and inefficient infrastructure challenges, such as those typically encountered in strategic infill projects, as well as on enabling or coordinating the delivery of major essential infrastructure pathways (water, sewer and major transport connections).

The establishment of the Unit and the capability of its leadership, represents an opportunity for South Australia to increase housing supply by enabling housing development projects that would otherwise not be viable due to infrastructure challenges.

Another area of focus for the Unit, which would deliver major gains, would be removing roadblocks for the industry to work with other branches of government to ensure essential service providers, such as SA Water, have adequate funding to augment infrastructure to keep pace with the demand for residential allotments in greenfield developments.

Conclusion

Greater Adelaide has the potential to keep growing. To maintain this momentum and to support the State Government's ambitious economic development strategy that relies on our ability to provide affordable housing for skilled workers, there must be adequate housing. Not in the form of sterile estates tacked onto the edge of the built-up area, but imaginative, living communities in which everyone can be proud.

Adelaide has a fine tradition of innovative plans, starting with the creation of a spacious downtown surrounded by parkland and, later, by the development of very liveable garden suburbs beyond. The city has long won the praise of international planners.

Targeted and strategic land supply where people want to live, with affordable housing choices, will satisfy demand and solve our housing crisis. It will also create jobs, support economic growth and help ensure a more prosperous and sustainable housing future for our children and grandchildren.

Regional growth areas and lifestyle zones such as Two Wells, Roseworthy, Mount Barker, Sellicks and Angle Vale, have the potential to be vibrant communities that are self-sufficient and generate income for the Federal, State and Local governments that administer them.

They are not a drain on state spending. Rather, they are precisely the opposite. Water, energy, roads and community infrastructure—such as new schools and childcare—come as part of the development package and, importantly, meet modern environmental standards.

Roseworthy Garden represents a choice for aspirational homeowners who are attracted to a well-planned and sustainable development that is creating an environment that is welcoming, safe and secure for their families, is forward-looking and progressive and supports economic prosperity now and for generations to come.

Thank you for considering our submission.

Yours sincerely
Hickinbotham Group

Michael Hickinbotham
Managing Director

DTI:PlanSA Submissions

From: Sarah Louise Hunter [REDACTED]
Sent: Monday, 6 November 2023 12:20 PM
To: DTI:PlanSA Submissions
Cc: Michael Hickinbotham
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper | Michael Hickinbotham
Attachments: HICK2023-40.pdf

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Dear Sir/Madam

On behalf of Hickinbotham Group Managing Director, Michael Hickinbotham, I provide the attached 'Submission – Greater Adelaide Regional Plan Discussion Paper'.

Kind regards

Sarah Hunter
Executive Assistant to Michael Hickinbotham
Hickinbotham Group

25 North Terrace, Hackney SA 5069
PO Box 63, Stepney SA 5069

[REDACTED]
Web: www.hickinbotham.com.au

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HICK2023-40

6 November 2023

By Email: plansasubmissions@sa.gov.au

Submission – Greater Adelaide Regional Plan Discussion Paper

The following submission is made in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper.

Hickinbotham has an interest in Sellicks Beach and its designation as a growth area for Greater Adelaide. Sellicks has been identified as the location for approximately 1700 new dwellings and associated infrastructure, plus social, recreational, commercial and retail services, following the South Australian Government's land supply announcement earlier this year.

Hickinbotham has been made aware that a major landholder in and adjacent to the Sellicks Beach Growth Area, St Vincents Pty Ltd, has submitted to the GARP Discussion Paper regarding its holding, which is partially included in the Sellicks Beach Code Amendment.

While a portion of the St Vincents landholding falls within the designated Sellicks Beach Growth Area, a majority of this holding is, in fact, located within the Character Preservation District for McLaren Vale.

St Vincents has identified in the GARP Discussion Paper a consideration for a future, longer-term land release strategy at Sellicks Beach. To that end, St Vincents has indicated its desire to include the whole of its landholding within an expanded Sellicks Beach Growth Area, to assist with improved infrastructure planning for the whole area and to minimise costs.

St Vincents has indicated it considers the land to have strategic significance in the delivery of cost-effective infrastructure to support the affordable delivery of future housing supply at Sellicks. As St Vincents makes clear, the consideration of additional land strategically located between the established built-up area and Main South Road allows infrastructure agreements to be established over a greater area and to better integrate with the existing road network. This has the benefit of spreading infrastructure costs over a greater area and better integrating with the broader region.

This is a logical and common-sense approach to future planning for the area, given the constraints and limited options on available land in this southern fringe of Greater Adelaide.

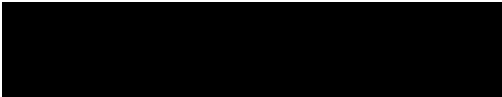
The southerly extension of Adelaide's urban area is highly suitable, noting the extension would be able to:

- leverage off the recent and funded investment for upgrades to Main South Road;
- support infrastructure augmentation, particularly in respect to wastewater management, could be facilitated in a staged and orderly manner; and
- utilise land that is not within a designated primary production priority area.

It is also in keeping with the Minister for Planning, Housing and Urban Development's desire to see more land within the urban growth boundary be brought online for much-needed residential housing about which he wrote to all Councils, including Onkaparinga seeking their support.

As the landowner's developer partner in the Sellicks Beach master planning, Hickinbotham supports the position taken by St Vincents.

Yours sincerely
Hickinbotham Group



Michael Hickinbotham
Managing Director

DTI:PlanSA Submissions

From: Sarah Lowe [REDACTED]
Sent: Monday, 6 November 2023 11:55 AM
To: DTI:PlanSA Submissions
Cc: [REDACTED] Nic Hicks; Grazio Maiorano
Subject: GARP Discussion Paper Submission - Two Wells
Attachments: 231106 Hicks Submission on GARP.pdf

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Good morning,

Please find attached a submission prepared on behalf of the Hicks family.

Kind regards,

Sarah



Sarah Lowe
Consultant
[REDACTED]

27 Halifax Street
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Adelaide SA 5000
08 8333 7999

Kaurna Country

My working hours are:
Monday to Friday 8.30am-5.00pm

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6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Two Wells

We act for the Hicks Family regarding their land located in Two Wells.

Thank you for the opportunity to comment on this Discussion Paper (Paper), which seeks to stimulate debate on how the GARP will help deliver the 300,000 additional homes (and associated employment land) possibly needed over the next 30 years.

Affected Area

Our client owns the following three allotments in Two Wells (the Affected Area):

- Lot 14 Mallala Road, Two Wells CT5273/674
- Lot 2 Sharpe Road, Two Wells CT5273/673
- Lot 22 Sharpe Road, Two Wells CT6127/803

The Affected Area is 91ha in size and located within the Rural Horticulture Zone and Environment Food Protection Area (EFPA). The land to the south and west is zoned Master Planned Township and is the focus of recent growth in Two Wells.

A substantial amount of land in Two Wells has been brought online in recent years to accommodate residential development following the 30-Year Plan for Greater Adelaide identifying the town as a growth area.

The recently completed Adelaide Plains Council (Council) Growth Strategy and Action Plan (GSAP) has identified potential future urban growth areas. This includes the Affected Area which presents a logical expansion to the township.

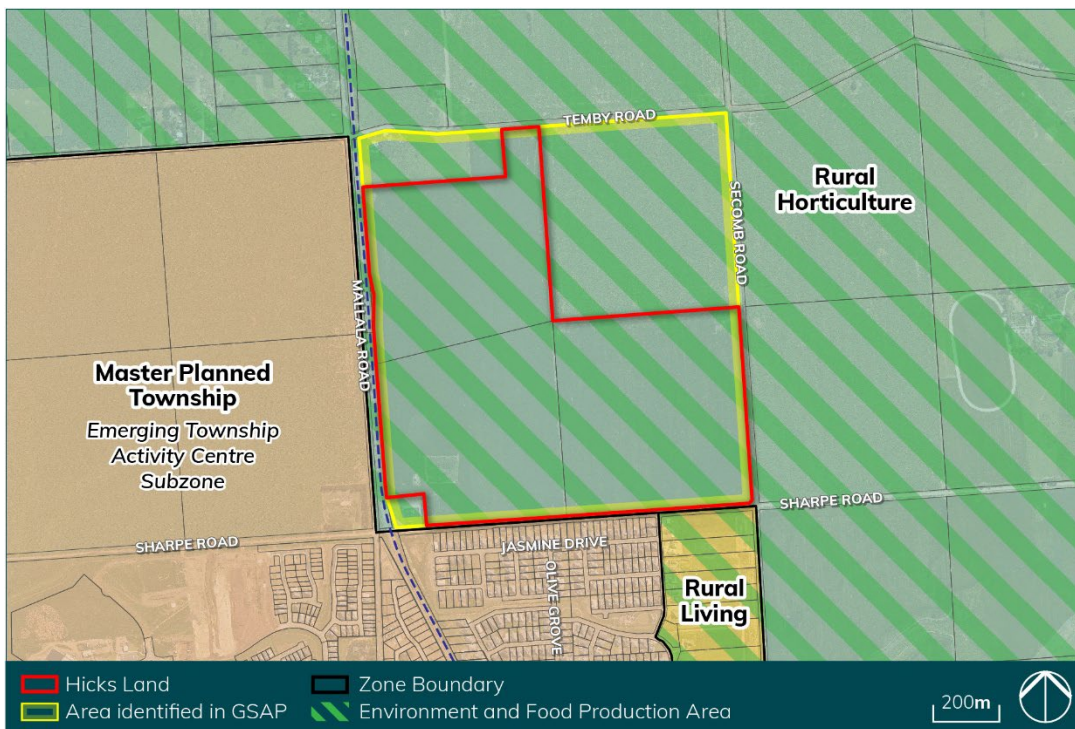


Figure 1 Affected Area and zone mapping

Requested Action

We request the Commission to identify the Affected Area as being suitable for an expanded Two Wells township.

We are conscious that infrastructure is an important component of any future rezoning of this land. We have had preliminary discussions with Council to understand infrastructure issues and will continue these conversations. We are aware the CWMS, stormwater management and access are key focuses with preliminary work underway to manage these matters.

Justification

Consistency with GARP Discussion Paper

The Paper indicates that Greater Adelaide's population could grow by up to 670,000 people over the next 30 years. Targeted greenfield and infill development must occur to provide appropriate housing and employment for these people.

The Paper acknowledges that development around townships like Two Wells will continue to play an important role in accommodating housing demand. It is identified (mapped) as a Growth Investigation Area on page 126 of the Discussion Paper.

Greenfield estates are also critical to the supply of affordable housing and providing affordable housing:

The development of new suburbs on the metropolitan fringe or around townships will continue to form an important part of the Greater Adelaide Regional Plan.

Greenfield development is the urban development of broad hectare land. This often occurs on farming land on the edge of suburbia like Angle Vale and Two Wells, and regional satellite cities like Murray Bridge and Victor Harbor.

New housing in greenfield estates is an important supply of affordable housing. Young families and first home buyers often prefer this option (p 111).

Further, the Paper identifies Two Wells inside of the 'north-western spine', being one of the four areas outside of metropolitan Adelaide to be investigated for future housing and employment growth. The north-western spine has been identified because (among other things):

It makes use of the significant investment in road infrastructure already completed.

Further development would build on and leverage the current development activity that is already planned for Riverlea and Two Wells, which is anticipated to provide more than 15,000 new dwellings over the short to medium term.

The topography of the land does not present significant challenges.

The land has lower primary production value than other high-quality land in the north (p. 119).

The Affected Area displays all the characteristics above which indicate it is suitable for township growth.

We note that much of the north-western spine is within the Rural Horticulture Zone and/or EFPA. We support further investigation to strategically work through and resolve these matters.

General Suitability of the Affected Area

In addition, the Affected Area is suitable for township growth because:

- It forms a logical expansion of the Two Wells township and the Master Planned Neighbourhood Zone, directly to the south and west.

- Interface issues are likely to arise in the future, as the township continues to expand toward its western and southern boundaries, in turn affecting the productivity and viability of the land.
- It can capitalise upon recent, significant investments in infrastructure associated with the expansion of the Township.
- It is a large, flat, consolidated land holding under common ownership (91ha) which provides an opportunity for a master-planned development outcome. It has capacity to support 2,500 residents / 1400 dwellings.
- It is shown to be a potential urban growth area per Council's Growth Strategy (GSAP).

The GSAP

The Hicks family actively engaged with Council during the preparation of the GSAP, which was adopted on 24 April 2023.

The GSAP identifies the Affected Area as being able to support urban growth.

The GSAP has a long-term view to 2040 and focuses on growth actions for the next 5-10 years.

Importantly, Two Wells is identified as accommodating the majority of growth in the Council region, with 80% of the area's population growth anticipated to occur here.

Further, Council supported preliminary investigations into the development potential of the Hicks land in 2019.

Conclusion

We support Two Wells being identified as a growth area within the Paper, and we request that the Affected Area is identified as forming part of the expanded Two Wells township.

Further, we suggest that the Affected Area is treated as a priority growth area, to ensure the population growth targets and housing demands are met.

Not only is the Affected Area suitable for township expansion, the land owner has clearly demonstrated an interest and ability to develop upon the land's potential.

We are keen to work with the Commission, state agencies and Council to ensure the development of this land and the delivery of the identified housing and employment objectives.

Yours sincerely



Sarah Lowe
Consultant

From: [REDACTED]
To: [DTI:PlanSA Submissions](#)
Cc: [REDACTED]
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Date: Monday, 6 November 2023 3:09:58 PM
Attachments: [REDACTED]

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To whom it may concern:

On behalf of interested parties in the locality of Dublin, please find attached a submission to the Greater Adelaide Regional Plan Discussion Paper.

Thank you for the opportunity to provide comment.

Should you have any queries please contact the undersigned.

Regards

David Lake

[REDACTED]

MASTERPLAN

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6 November 2023

Department for Trade and Investment
GPO Box 1815
ADELAIDE SA 5001

Via email: plansasubmissions@sa.gov.au

Attention: Growth Management Team, Planning and Land Use Services

Dear Sir/Madam

Re: Submission – Greater Adelaide Regional Plan Discussion Paper

MasterPlan has reviewed the Greater Adelaide Regional Plan (GARP) Discussion Paper on behalf of interested parties in the locality of Dublin. These interested parties have made submissions to the Adelaide Plains Council as part of Council's consultation in developing its ideas and strategies for the future of the Council area.

We have also read Council's submission to the GARP, dated 30 October 2023, and endorse its broad intent.

Council has undertaken significant investigations, review and consultation in formulating its Growth Strategy and Action Plan (GSAP), which was adopted by Council on 24 April 2023. The GSAP is based on a three-town service model of Mallala, Two Wells and Dublin.

This submission is in support of Council's broad strategy and focuses on Dublin township and district.

To the east and south of Dublin is an industrial area that has grown from a single saleyard enterprise to an agricultural service hub. This hub will inevitably be under pressure to grow as it supports the changing rural/agricultural sector. Growth in this precinct around Carslake Road brings with it the associated service sector growth and demands, offering employment opportunities for which housing and other services are desirable, proximate to these industries. This is a significant driver for building on the capacity and capability of Dublin.

Dublin is also the turning point for visitors to the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara. The Sanctuary has a growing following however key services, including accommodation are not available locally and facilities in the Dublin township are limited.





In recognition of these and other factors, Council allocated funds as part of its strategy to investigate the expansion of Dublin via preparation of a Dublin Township Growth and Tourism Master Plan. These investigations are advanced and include:

- A Background Paper and discussions with local stakeholders and development interests;
- Further investigations as to the opportunities to grow tourism and business experiences;
- The need/demand for land supply for housing, and other housing and living choices, tourism and other development needs;
- Assessment of agricultural value and productivity for food production;
- Consideration of interface issues with existing operations;
- Need and provision of community infrastructure and open space; and
- Need and provision of service infrastructure of power, sewer and water.

Council has recognised that growing Dublin's services role is necessary to support existing and future agribusiness and tourism needs including support of visitation to the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara, which is an important part of the Greater Adelaide Open Space System.

Together these features acknowledge and aim to foster the support, growth and development of the established township of Dublin.

On page 118 the Greater Adelaide Regional Plan acknowledges that the areas of investigation (for growth) did not extend as far as Dublin and Mallala but states, "These towns will keep their own separate identity but may expand locally to support township function and viability."

In the absence of any further recognition in the GARP, an approach to allow or facilitate and support growth of township function and identity together with that of the agribusinesses and tourism, including the Adelaide International Bird Sanctuary National Park - Winaityinaityi Pangkara is essential.

We support Council's broad strategy as expressed in the GSAP, and the opportunity for local growth in the interests of the Dublin township and its community, and those who enjoy the agribusiness enterprises in its domain, and the tourism offerings of international and local significance.

Yours sincerely

Simon Tonkin
MasterPlan SA Pty Ltd

DTI:PlanSA Submissions

From: Martin Jeffries [REDACTED]
Sent: Monday, 6 November 2023 4:27 PM
To: DTI:PlanSA Submissions
Cc: Lachlan Jeffries
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP 6 November 2023.pdf

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Attention: Growth Management Team, Planning and Land Use Services Department for Trade and Investment.

Please find attached: Submission - Greater Adelaide Regional Plan Discussion Paper

Yours Sincerely,

Martin Jeffries
Managing Director

Jeffries Group

Web: www.jeffries.com.au

PO: Box 60, Rosewater East, SA 5013

Address: 412 Hanson Road North, Wingfield, SA 5013

6 November 2023

Growth Management Team, Planning and Land Use Services

Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

Attention: Growth Management Team, Planning and Land Use Services

Thank you for the opportunity to provide feedback on the Greater Adelaide Regional Plan Discussion Paper.

At Jeffries we have had our hand South Australian soil for generations, growing strong since 1842.

We exist to create value from organic resources.

We have built a strong reputation both nationally and internationally as a leader in the recycling of organic resources. Through our operations at Buckland Park over the last 20 years we have recycled over 2,000,000 tonnes of organics diverted from landfill by Adelaide households and commercial enterprises. Once processed this material is returned to help improve the productivity of our soils helping Adelaide and South Australia transition effectively to a circular economy.

We summarise our feedback in the following bullet points:

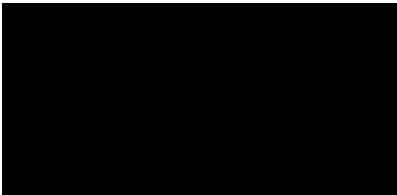
- Jeffries Major Land Holding: Jeffries holds a significant and strategically located land parcel within the Buckland Park region. This site is a critical asset for the company, serving as the home to Jeffries composting operation since 2004. Jeffries has contributed significantly to the local economy and environmental efforts in South Australia by managing organics recycling through this operation.
- State Government Major Projects: The Jeffries site was deemed a Major Project by the state government in early 2000 and planning approval for the site was given by Major Projects department on December 5th, 2003.
- Critical Infrastructure to the State: Jeffries composting operation at Buckland Park is a critical component of South Australia's waste management and recycling capability. The facility plays a pivotal role in managing and processing organic materials, thereby contributing to the state's sustainability goals. The facility's operations ensure the responsible and effective recovery of organic resources while simultaneously reducing the burden on landfills. Jeffries has invested, and continues to invest, very heavily in the site and its composting operations to ensure world class resource recovery.
- Future Land Use Trends: The Buckland Park region, where Jeffries land holding is located, has been experiencing noticeable transformation and development in recent years. This change is driven primarily by the encroachment of residential developments, such as Riverlea and other land development projects in the vicinity. As a result, the area's landscape is evolving from its historically agricultural and industrial character towards a more residential and mixed-use one.
- Future Operational Options: The recent residential development activity and communication of future plans in the Buckland Park area places significant pressure and uncertainty over the Jeffries site. It is unlikely, if not impossible for the Jeffries operations and the current residential development to cohabitate, let alone as the residential activity expands.

- Composting Operations Relocation: Composting operations are capital intensive, and the detailed planning, development and licencing requirements means significant financial investment and a long lead time is needed to develop these operations. Investment cost that like most things have increased significantly in recent years.
- Request for Transition Consideration: Recognising the ongoing transformation of the Buckland Park region, Jeffries requests that the government and relevant stakeholders consider the challenges that we will face as a result of the land's transition from its current role as a composting operation to a residential development zone.

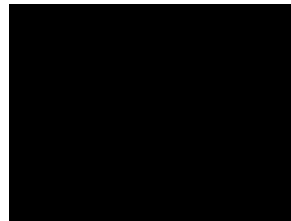
Jeffries seeks to collaborate with the relevant authorities and stakeholders to create a well-planned and thoughtful transition from a composting operation to a residential development zone. This will ensure that the land's potential is harnessed, while these authorities and stakeholders effectively support the relocation of the composting operation. As South Australia advances further into a true circular economy it is expected that the volumes of organics to be recycled from Adelaide residents and enterprises will increase significantly, making effective relocation of this facility critical.

Thank you again for this opportunity to comment on this plan and we look forward to further dialog as the plan develops.

Yours Sincerely



Martin Jeffries
Managing Director
Jeffries Group



Lachlan Jeffries
Executive Chairman
Jeffries Group

DTI:PlanSA Submissions

From: Sergio Lucia [REDACTED]
Sent: Monday, 6 November 2023 2:15 PM
To: DTI:PlanSA Submissions
Cc: Paul Macchia
Subject: Adelaide Development Company - Greater Adelaide Regional Plan submission
Attachments: Submission to GARP - Justin Pty Ltd.pdf

Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from [REDACTED]. [Learn why this is important](#)

Attention: Growth Management Team, Planning and Land Use Services - Department for Trade and Investment

Please find attached the following submission, prepared on behalf of Justin Pty Ltd, in response to the Greater Adelaide Regional Plan (GARP).

Should you need further information or have queries of clarification, please make contact at your convenience.

Thank you

Best Regards

Sergio Lucia
Chief Operating Officer
EDC ADC Group

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6 November 2023

Department for Trade and Investment
GPO Box 1815,
Adelaide SA 5001

Level 1, 199A Rundle Street
Adelaide South Australia 5000
GPO Box 1348 Adelaide
South Australia 5001

T 08 8223 1488
E adc@estates.com.au

Via email: plansasubmissions@sa.gov.au

Attention: Growth Management Team, Planning and Land Use Services

Dear Sir/Madam

Re: Submission to Greater Adelaide Regional Plan

Adelaide Development Company (ADC) is a representative of Justin Pty Ltd (Justin) which owns and controls land within the township of Middleton on the Fleurieu Peninsula of South Australia.

The following submission, prepared on behalf of Justin, is provided in response to the Greater Adelaide Regional Plan (GARP) discussion paper. As part of identifying long term land for growth (16 to 30 years), the following submission requests that the State Planning Commission (Commission) to review growth opportunities within the Environment and Food Production Areas (EFPA) surrounding Middleton.

ADC considers the Justin land (detailed below) should be removed from the EFPA (as defined by the plan in the General Registry Office at Adelaide numbered G17/2105) at the time of the next EFPA review due in 2027 to secure future land supply within Middleton.

1. Subject Land

1.1 Land Description / Identification

The land that is proposed to be included within the township boundary of Middleton (and removed from the EFPA) is located on the corner of Ocean Road, Lines Road and Glenford Gully Road, Middleton.

It comprises four (4) Certificates of Title as follows:

Certificate of Title	Allotment / Plan	Area (hectares)	Under the control and ownership of:
Volume 5773 Folio 648	Allotment 1 Deposited Plan 18865	20.77	Justin Pty Ltd
Volume 5835 Folio 196	Allotment 171 Filed Plan 165420		
Volume 5773 Folio 649	Allotment 2 Deposited Plan 18865	1.17	Others
Volume 5793 Folio 476	Allotment 172 Filed Plan 165421		

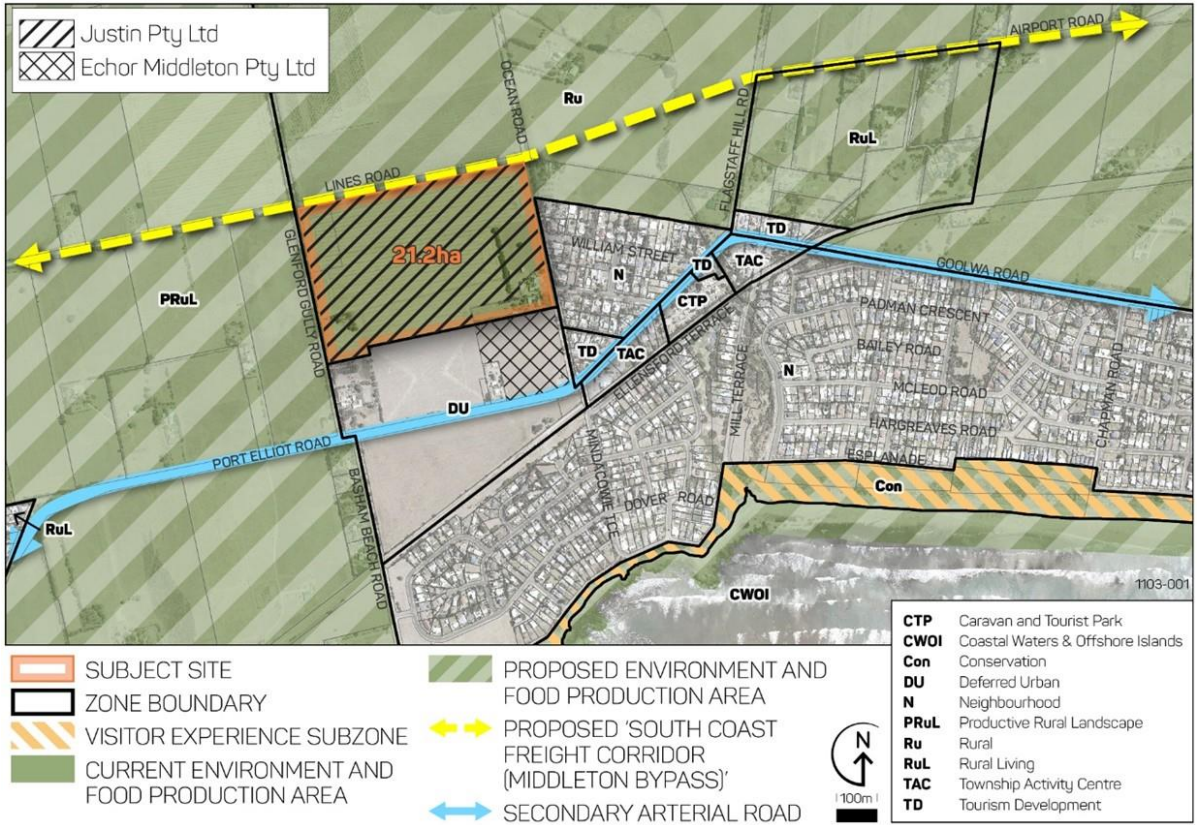
The total area of subject land (all allotments combined) is approximately 22 hectares.

Importantly, a related corporate entity (Echor Middleton Pty. Ltd.) also owns and controls land to the immediate south of subject land on the corner of Port Elliot Road and Ocean Road. This land (recognised as Certificate of Title Volume 5490 Folio 811) measures 3.64 hectares, is located within

the 'Deferred Urban Zone', is not located within the EFPA and therefore does not form part of the subject land for purposes of this submission.

Figure 1.1 below identifies the land under the control of Justin and its related corporate entity, Echor Middleton Pty Ltd, as well as the location and configuration of the 'subject land' that is proposed to be removed from the EFPA.

Figure 1.1 Subject Land



Images of the subject land and surrounds are provided in Figure 1.2 and 1.3 below

Figure 1.2 Subject Land looking South West from the Corner of Ocean Road and Lines Road



Figure 1.3 Existing Dwellings (owned by others) on the subject land



1.2 Existing Zone & Policy Framework

The subject land is currently located within the 'Rural Zone' of the Planning and Design Code (Version 2023.14 –12 October 2023). The subject land is affected by a number of 'Overlays', including the 'Environment and Food Production Area' Overlay and 'Limited Land Division' Overlay.

Land to the immediate south of the subject land is located within the 'Deferred Urban' Zone whilst the land to the east of the site, over Ocean Road, is located within both the 'Neighbourhood Zone' and 'Rural Zone'. Land to the immediate west of the site, over Glenford Gully Road, is located within the 'Productive Rural Landscape Zone'.

Figure 1.1 above identifies the current Zoning that applies to the subject site and surrounding properties.

2. Existing Land Supply & Demand

2.1 The Fleurieu Region

As highlighted in the GARP discussion paper 'there is limited land supply or development opportunities in other parts of the southern region, due to topographical constraints, or protections associated with primary production, character or environmental value'. The majority of greenfield land in the Fleurieu Peninsula is located within the larger townships of Goolwa, Victor Harbor and Strathalbyn.

The supply does not correlate with the high demand experienced in the smaller coastal townships of Port Elliot and Middleton where there is little 'Development Ready' allotments. Port Elliot also has no 'Undeveloped Zoned' allotments whilst Middleton has only 2 'Undeveloped Zoned' allotments

On this basis, the current land supply and demand relationship on the south coast of the Fleurieu Peninsula region is not balanced, offers limited choice to the consumer, is not responsive to local and regional demands and fails to avoid concentrations of similar offerings in the larger townships.

2.2 COVID-19

With domestic and international travel restricted during the COVID-19 pandemic, there was a sharp rise in demand for housing in regional, coastal locations nationwide. The Fleurieu Peninsula, being a beneficiary of the increase in demand, saw property prices spike with the biggest market Victor Harbor recording a 26.44 per cent jump in the price growth throughout the 12 months to December 2021.

The increased demand along the Fleurieu Peninsula intensified supply constraints particularly in the rental market which has seen existing residents pushed out of rental properties. For the supply constrained Middleton market, COVID-19 generated additional market demand with people seeking a quality surf beach getaway or a small-town lifestyle change. The increased demand has exacerbated the economic distortion in the Middleton market with the median price growing a further 9.5% in the 12 months to September 2023.

2.3 2021 Greenfield Land Supply Report

The 2021 Greenfield Land Supply Report identified a remaining capacity of only 240 allotments within the township of Middleton comprising:

- 98 vacant allotments;
- 0 Development ready zoned allotment;
- 3 Undeveloped Zoned allotments; and
- 145 lots in 'Future Urban' Growth Areas.

The report confirms that *'Future expansion of the township is currently constrained by the EFPA'*.

2.4 The Middleton Deferred Urban DPA

A Statement of Intent for the 'Middleton Deferred Urban Development Plan Amendment' (DPA) was prepared by Alexandrina Council in August 2019 and sought to rezone the current 'Deferred Urban' Zone to the north- west of the township (immediately south of the subject land) to a Residential Zone.

The Council was approached to rezone the land by a consortium of land-owners that collectively owned 98% of the land within the Deferred Urban Zone (inclusive of Echor Middleton Pty Ltd).

The consortium of land-owners prepared a Statement of Justification (SOJ) to support the DPA.

To assist in informing this DPA and as part of the SOJ, Ethos Urban were engaged to undertake a land supply analysis of available residential land within the Middleton township. This analysis dated May 2019 is attached in *Appendix 1* and informed the conclusions expressed within the 'Statement of Intent' of the Middleton Deferred Urban DPA:

- *Conservative population forecasts for Alexandrina Council predict a population increase of 10,370 persons between 2016 and 2041, with an increase of 390 persons predicted within the Middleton area (.id consulting Pty Ltd);*
- *The number of house sales in Middleton have remained consistent over the past 10 years or so, ranging from a low of 35 sales in 2011 to a high of 62 sales in 2017. Between 2009 and 2018, an average of 50 house sales have occurred each year in Middleton;*
- *The number of vacant land sales in Middleton has averaged 21 sales a year between 2009 and 2018; however the number of sales have declined in recent years along with the diminishing availability of vacant lots*
- *Between 2011 and 2017 an average of 23 new dwelling building approvals were granted each year within the Middleton area;*
- *Vacant residential land in Middleton available for development is largely exhausted. At present 78 vacant residential lots exist (according to an aerial assessment).*
- *The limited supply of vacant lots has a significant impact on the price of vacant lots, with the median vacant lot price increasing by 16.8% per annum between 2013 and 2018.*
- *Assuming a supply of land is available, it is reasonable to expect residential land sales and development to be in the order of 20-30 lots a year.*

The Statement of Justification (and the resultant Statement of Intent) concluded that only a three to four year supply of residentially zoned land was available within Middleton.

2.5 Middleton Code Amendment

In September 2023 the Minister for Planning approved the Middleton Code Amendment which rezoned a parcel of Deferred Urban zoned land into Master Planned Township. The rezoned land on Port Elliot Road and Basham Beach Road proposes the establishment of 52 allotments into the Middleton Land supply.

A report produced for the Middleton Code Amendment by Ethos Urban found 'based on a review of the latest aerial photography (Nearmap, March 2022), a total of 68 vacant residential lots currently exist in the urban area of Middleton. However, not all of these lots are available to the market for development, with the likelihood of these lots being developed in the near future also unknown.' The report also found that the supply constraints in Middleton's residential market and the increasing popularity of coastal locations such as Middleton, an 'assumed demand for 20 to 30 new residential dwellings a year in Middleton is considered to be conservative.'

Noting the findings above, it can be assumed that the current land supply in Middleton is within the following ranges:

- 60-80 vacant allotments;
- 1 Development ready zoned allotment (up to 52 allotment)
- 2 Undeveloped Zoned allotments (up to 91 allotments)

Assuming a very conservative 20 allotment sales per year on 132 allotments (80 vacant and 52 development ready) there is currently six and a half years (6.5) of land supply within Middleton. If the remaining undeveloped Deferred Urban land was rezoned, assuming a conservative yield of approximately 8 dwellings per hectare the Deferred Urban land could establish up to 91 allotments, which would realise approximately eleven (11) years of land supply in Middleton.

3. Legislative Framework

3.1 The Three Point Test

The EFPA boundaries may be varied only under certain circumstances in accordance with the Act. These circumstances are referred to as the 'Three Point Test' and are set out under section 7(3) of the Act as follows:

If the Commission is satisfied, that:

Test 1: an area or areas within Greater Adelaide outside Environment and Food Production Areas are unable to support the principle of urban renewal and consolidation of existing urban areas; and

Test 2: adequate provision cannot be made within Greater Adelaide outside Environment and Food Production Areas to accommodate housing and employment growth over the longer term (being at least a 15-year period); or

Test 3: that the variation is trivial in nature and will address a recognised anomaly.

As demonstrated in Section 2 above, Test 1 is satisfied given an 'area' within Greater Adelaide (the township of Middleton within the Fleurieu Peninsula region) that is outside the Environment and Food Production Areas is unable to support the principle of urban renewal and consolidation of existing urban areas recognising that there is an acute shortage of land for future residential purposes within the township, limited opportunity for renewal and consolidation and recognised unmet market demand.

In our considered opinion, the test established by section 7 of the Act is satisfied and in our view the Commission can review and recommend an amendment to the EFPA as it relates to the township of Middleton.

4. Suitability of Subject Land for Urban Development

The Southern & Hills Local Government Association's 2020 Transport Plan seeks consideration of a 'South Coast Freight Route' including B-Double vehicle access through the main street of Middleton.

The proposed future 'South Coast Freight Corridor' is identified in *Figure 4.1* with Councils preferred alignment around the township of Middleton identified in *Figure 1.1* above.

Figure 4.1 South Coast Freight Corridor (Southern & Hills Local Government Association, 2020 Transport Plan - 2015 Update)

4.2 Market Attraction and Demand

As demonstrated in the Ethos Urban report attached in *Appendix 1* there is a deemed demand for land for housing within the Middleton Township.

The limited supply of vacant lots in Middleton and demand for housing is also reflected in the price of vacant lots in Middleton in recent years. Ethos Urban have identified that the median vacant lot price increased by 16.8% per annum between 2013 and 2018. This compares to a decline in Port Elliot of -2.3% per annum over the same period, a decline of 5.6% per annum in Goolwa and a slight increase of 0.7% per annum throughout Alexandrina.

4.3 Subject Land Potential (Capacity)

Assuming a conservative yield of approximately 8 dwellings per hectare, the subject land could yield in the order of 176 dwellings.

When combined with the existing Deferred Urban land under the control of Echor within the existing Middleton township boundary, this equates to approximately 200 additional dwellings. This housing supply will support future housing demand within the township.

There is a likelihood that the forecasted growth potential is quite conservative, particularly with the recent shift in more people moving to regional areas and flexibility in working arrangements across the country, especially during the covid pandemic. In the context of South Australia, the Australian Bureau of Statistics (ABS) figures released in May 2021 indicated South Australia had a net migration gain for the first time in 30 years in 2020, with the regions responsible for this gain (capital cities still had a net loss in 2020).

4.4 Transport and Connectivity

Investigations undertaken by Circa in support of the 'Middleton Deferred Urban DPA' confirmed that the locality is well serviced by existing transport infrastructure inclusive of Port Elliot Road which is a secondary arterial Road.

The future development of the proposed 'South Coast Freight Road' to the immediate north of the site (along Lines Road) would also improve vehicle access arrangements to the subject land and ensure limited impact on the existing road network in association of any minor increase in traffic movements from future development of the subject land.

4.5 Service Infrastructure

Investigations undertaken by WGA in support of the 'Middleton Deferred Urban DPA' confirmed that the locality is well serviced by existing infrastructure to support future urban development.

4.6 Social and Economic Infrastructure

Middleton serves the role as a small-town centre, providing basic convenience retail and services to the immediate residential population and visitors. The 'Middleton General Store' has improved the retail offer within the township. Notwithstanding, Middleton residents and visitors travel to nearby towns (i.e. Goolwa and Victor Harbour located within a 10-minute drive) to undertake the majority of their shopping and access other services and amenities, within larger town centres.

The subject land is in close proximity to the coastal linear reserve, as established tourist and recreation offerings, surf beaches, Basham's Beach and the Cockle Train Railway.

There is adequate social and economic infrastructure within the existing township and the region to support the future growth and development of the town by approximately 320 dwellings (assuming the combined development of the subject land and existing Deferred Urban land).

4.7 Viability for Primary Production

Utilisation of the subject land for future urban development will not impact on the existing agricultural farm business or operations.

4.8 Propensity for Development

Justin has the capacity, capability, and experience to develop this land for urban purposes.

5. Submission Request

ADC requests that when the EFPA's are next reviewed, the Commission provide direction to investigate Middleton to ensure an ongoing 15-year supply of zoned urban land within the township. ADC has identified six and a half years (6.5) of development ready land supply remaining within Middleton and approximately eleven (11) years of land supply if undeveloped zoned allotments outside of the EFPA were rezoned and developed.

ADC considers that a strong case exists to remove the subject land from the EFPA (as defined by the plan in the General Registry Office at Adelaide numbered G17/2105) at the time of the next EFPA review due in 2027. The removal of the EFPA will allow Justin to undertake a code amendment process which if successful would have the ability to supply up to eight and a half (8.5) years of supply into Middleton market. The land once developed would assist in addressing long term (16 to 30 years) demand for land and township growth.

ADC would like to reiterate the subject land meets the legislative requirements under the 'Three Point Test' set out under section 7(3) of the Act are therefore satisfied and in our opinion the Commission can review and initiate an amendment to the EFPA as it relates to the township of Middleton.

The subject land is well suited for future urban development and the amendment to the EFPA boundary to accommodate township expansion is appropriate given:

- *The subject land forms a natural, logical and contiguous expansion of the existing Middletown Township;*
- *The subject land is defined by Ocean Road, Lines Road and Glenford Gully Road, which creates an enduring township boundary, and act as a buffer between rural land and future urban development;*
- *The preferred alignment of the proposed new 'South Coast Freight Corridor' runs along Lines Road, further defining the northern boundary of the subject land, creating a physical and logical edge to the township, and therefore protecting viable primary production activities from future urban encroachment;*
- *There is a demonstrated demand for land for housing within the Middleton Township;*
- *The subject land could yield in the order of 170 dwellings which will assist to fulfil existing demonstrated housing demand for the township;*
- *The subject land and locality is well serviced by existing transport infrastructure and the future development of the proposed 'South Coast Freight Road' immediately north of the site (along Lines Road) will improve access arrangements to the subject land, limit impacts on the existing road network and ensure future transport demands can be accommodated;*
- *The locality is well serviced by existing infrastructure and can be readily serviced by all essential utilities, including wastewater, mains water, electricity and communications;*
- *There is adequate social and economic infrastructure within the existing township and the region to support the future growth and development of the Subject Land; and*
- *The majority of the land is under the control of one of the States leading developers that is well placed to develop this land for urban purposes.*

It is requested that that pursuant to section 7(8), section 7 (9) and section 7(10) of the Act, the Commission, at the time of the next EFPA review, publish a notice in the Gazette and in the SA Planning Portal to remove the subject land from the EFPA.

Adelaide Development Company thanks the Commission for the opportunity to provide this submission and we look forward to the opportunity to progress these issues further at the appropriate time.

Yours faithfully,



Sergio Lucia
Chief Operating Officer
EDC/ADC Group

DTI:PlanSA Submissions

From: Rick Hutchins [REDACTED]
Sent: Wednesday, 15 November 2023 4:16 PM
To: DTI:PlanSA Submissions
Cc: Murphy, Benjamin (DTI); Matt Sheedy
Subject: Minor edit to submission on the GARP Discussion Paper for land at Buckland Park (adj Virginia)
Attachments: 01587_002_20231115_GARP Submission.pdf

Hi,

We have identified an error in our submission with regard to the land owner entity identified. Please find attached an updated submission. We request that you replace the original submission with the attached.

The original submission referred to the land owner as [REDACTED] The land owner is now correctly identified as KJ & KM Sheedy and CT Sheedy.

No other changes have been made to the submission.

Please contact me on the below details should you have any further queries.

Kind regards,

Rick Hutchins
Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000



www.ekistics.com.au

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

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06 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: Submission on the Greater Adelaide Regional Plan Discussion Paper – Opportunity for Future Urban Growth – Land at Buckland Park (adjacent Virginia)

We act for KJ & KM Sheedy and CT Sheedy [Sheedy] who own and control land at Buckland Park with frontage to the western side of Port Wakefield Highway as identified below.

The subject land is located within an area that has been identified as a 'Growth Investigation Area' with the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper').

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Regional Plan for Greater Adelaide and seeking wide input to inform the setting of the strategic direction on how and where Greater Adelaide should grow.

This submission, prepared on behalf of Sheedy, is provided to support the identification of their land as a future urban growth area in the next Regional Plan for Greater Adelaide.

As set out in the submission below, the subject land is highly suitable for urban expansion based on its located fronting onto the proposed north-western spine of Port Wakefield Highway, its single ownership arrangements and limited constraints and is well positioned to be developed to meet the urban growth needs for Greater Adelaide.

1. SUBJECT LAND

The subject comprises the following three Certificates of Title, as listed below and as illustrated in **Figure 1.1**:

- Lot 11 Port Wakefield Highway: Certificate of Title Volume 5094 Folio 532 (Allotment 11 Deposited Plan 35112) – with an area of 8.106 hectares

- 411 Port Wakefield Highway: Certificate of Title Volume 5886 Folio 246 (Allotment 91 Filed Plan 163761) – with an area of 12.69 hectares
- 39 Thompson Road, Buckland Park: Certificate of Title Volume 5337 Folio 532 (Allotment 41 Filed Plan 36896) – with an area of 1.21 hectares



Figure 1-1 Subject Land

In total, the land holding has an area of 22 hectares with an approximate frontage of 750 metres to Port Wakefield Highway, and frontage to Thompson Road of approximately 430 metres.

The subject land is predominantly used for cereal-hay and livestock production purposes, and currently contains associated agricultural buildings and a farm house. The land is predominately flat.

2. LOCALITY AND CONTEXT

2.1. Location

2.1.1. Virginia Grove

The subject site is located opposite the Virginia Grove master planned development (eastern side of Port Wakefield Highway, refer to **Figure 2.1** below). The Virginia Grove development is centred around the Virginia Shopping Centre and includes a childcare centre and is within walking distance to the Virginia Primary School. The development includes a series of lakes and waterways with associated reserves and fitness trails. It is marketed as a ‘family friendly destination’ that supports a walkable neighbourhood.



Figure 2-1 Virginia Grove Masterplan

2.1.2. Buckland Park 'Riverlea'

The 'Riverlea' development site at Buckland Park is located approx. 2.6km to the north of the subject site. The vision for this master planned community is for a "vibrant family friendly neighbourhood" that includes a district level shopping and employment centre, sports precincts, new private and public schools, open space and recreation areas along with waterways (refer to **Figure 2.2**). This development is marketed as 'ideal for growing families.'



Figure 2-2 Riverlea Master Plan

2.1.3. The Palms Residential Park

'The Palms' residential park (over 50's lifestyle village) is located approximately 1.5km to the south of the site and contains communal facilities for its residents including a hall, outdoor pool, gym and walking trails. The park offers on-site management services during office hours and is marketed as being a 'stress-free country lifestyle' within a 'healthy social community.'

2.1.4. Surrounding Activities

To the immediate north, south and west of the subject site is currently a range of production land including a number of glass houses. The 'Jeffries' Composting Production site (EPA Licence 14428) is located approx. 2km to the west of the site (as the crow flies). Further to the south of the site (approx. 2.7km) is located the Adelaide International Raceway which may be now closed or used on limited occasions. The 'State Shooting Park' and 'International Clay Target Club' are located approx. 1.2km to the north of the site. The Greyhound racing track is also located at the State Shooting Park.

It should be noted that the subject site exceeds the EPA Evaluation distances for effective air quality and noise management of 1km for the composting works undertaken at the Jeffries facility. The subject site is however within the 2km Evaluation Distance of the State Shooting Park and therefore any development of the site would need to consider the noise impacts from this activity (similar to acoustic considerations within the Virginia Grove development which is located a similar distance from the park). It is further understood that the State Shooting Park is likely to be relocated in the near future given the existing and future residential development of surrounding land holdings.

P'Petual Holdings Pty Ltd have a 12 hectare modern green house and vegetable growing facility located at 234 Carmelo Road, Buckland Park which is located approximately 2.7km north-west of the subject site. This facility includes a desalination plant (EPA Licence number 43983). The EPA evaluation distance for this activity is on an individual assessment basis and considers noise emitted by the plant along with potential odour. Given the separation distance of the P'Petual Holdings land from the subject site (over 2.5km) and the separation of the site by other residential developments such as Riverlea which are located closer to desalination plant, the impact of this activity to future development over the subject land is considered to be minimal.

2.1.5. Access to Services and Infrastructure

The subject site has access to mains water and reclaimed water main and is connected to the SAPN overhead network (off Thompson Road). The High Voltage overhead transmission line traverse the site along its eastern and northern boundary.

A petroleum pipeline (EPIC Energy SA Moomba to Adelaide Gas pipeline -Wasleys to Adelaide Loop) traverses the northern portion of the site and then runs along the site's western boundary. Mains sewer is located on the eastern side of Port Wakefield Highway to service the Virginia Grove master planned community. An expansion of the mains sewer to service the subject site may be possible (subject to further investigations).

The subject site currently has direct vehicle access to Port Wakefield Highway and also a frontage to Thompson Road (that forms a left in/left out intersection with Port Wakefield Highway).

2.2. Local Strategic Context

2.2.1. Residential Broadacre Land Supply Reports

The ‘Residential broadacre land supply report – 30 June 2019’ reviewed supply and consumption of broadacre land in the Greater Adelaide Region to assist in the development of small area population and housing projections. This report identified that “at 30 June 2019, there were 7,857 hectares of residential zoned broadacre land in the Greater Adelaide Region, with a further 3,925 hectares identified for future urban growth.”

Importantly, the subject site was identified in the 2019 Broadacre Land - Northern Adelaide map as a future growth area (refer to **Figure 2.3** below).

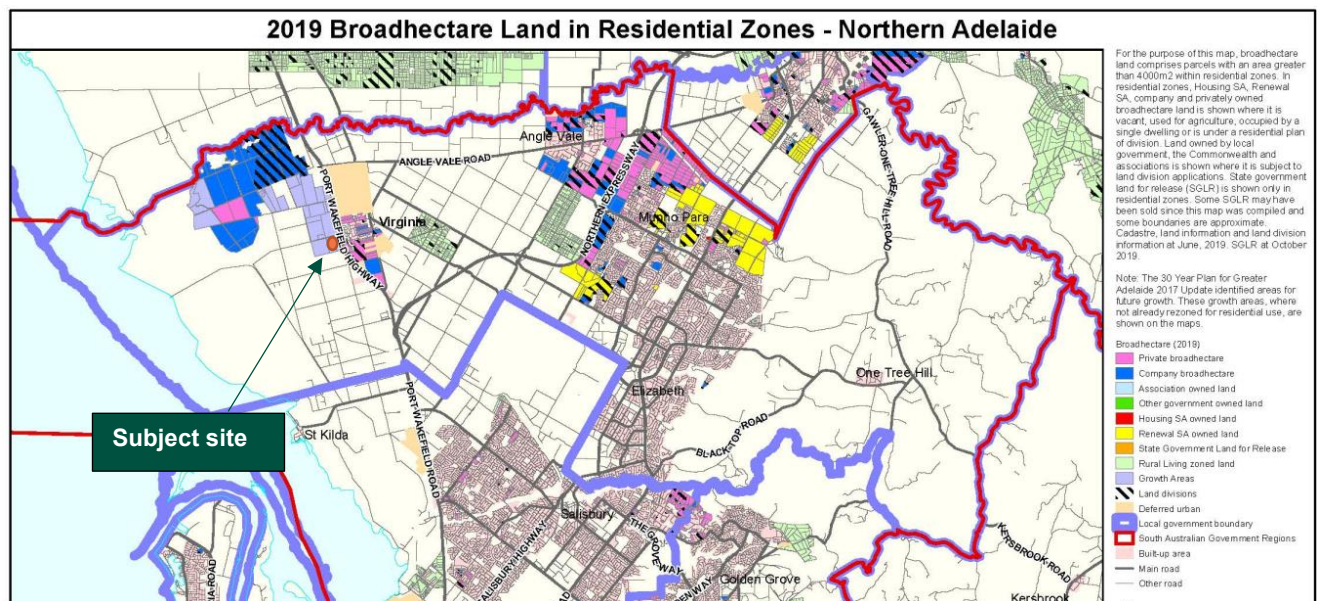


Figure 2-3 2019 Broadacre map

In June 2022, Plan SA released its Land Supply Reports for Greater Adelaide, which provided an updated analysis of residential project demand and supply across the Greater Adelaide Planning Region. This report identified that “Future Urban Growth could supply an estimated 33,550 lots once rezoned for residential use”, with the report further identifying that 18,200 future urban growth area lots are anticipated in the ‘outer north region’ following rezoning.

Further, the SA Property and Planning Atlas (SAPPA) identifies the northern portion of the site as a ‘Growth Area Broadacre’ from its Residential Broadacre 2022 data set (refer to **Figure 2.2** on the following page).



Figure 2-4 - Residential Broadacre 2022 land (source: SAPPA)

2.2.2. Virginia Horticultural District

The 30 Year Plan for Greater Adelaide, 2017 update sought to “progressively change Adelaide’s urban form by containing the outward growth of the metropolitan area and avoiding the ongoing consumption of highly productive agricultural and horticultural land on the urban fringe.” Policy 60 of the 30 Year Plan sought to ensure that:

“P60 Land use planning in and around the Virginia Horticulture District aligns with projects for industry growth and revitalisation anticipated by the Northern Economic Plan.”

The ‘Virginia Horticulture District’ or commonly referred to as the ‘Virginia Triangle’ encompasses land that stretches from Waterloo Corner to Angle Vale and from Bolivar to Gawler River (refer to **Figure 2.5** on the following page). The Virginia Horticulture District is located within the Environment Food Production Area (EFPA). The EFPA was introduced into the Planning, Development and Infrastructure Act, 2016 to protect rural, landscape and environmental areas from urban encroachment.

Importantly, the City of Playford Regional Structure Plan identifies (refer to **Figure 2.6**) the primary area of the Virginia Horticulture District which is to be protected for horticultural activities lies to the east of Port Wakefield Highway and does not impact the subject site. The site is also not located within the EFPA.

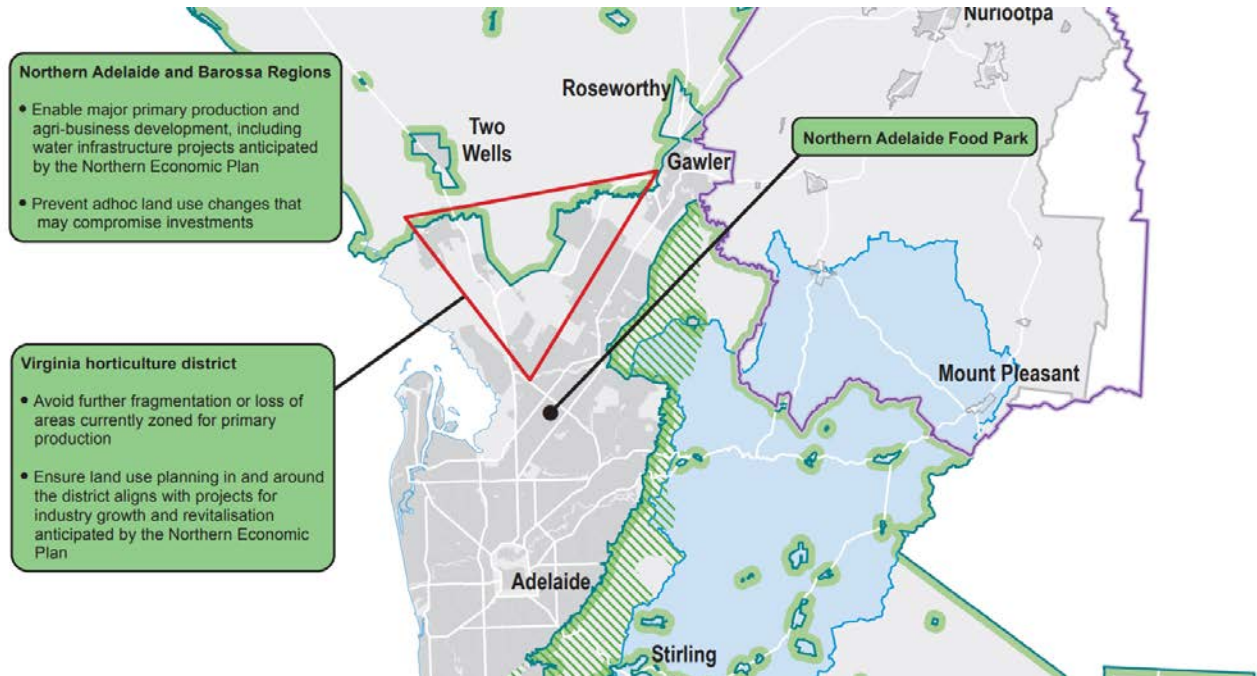


Figure 2-5 Map 5 - EFPA - Virginia Horticulture District (source: Living Adelaide)

2.2.3. City of Playford Regional Structure Plan

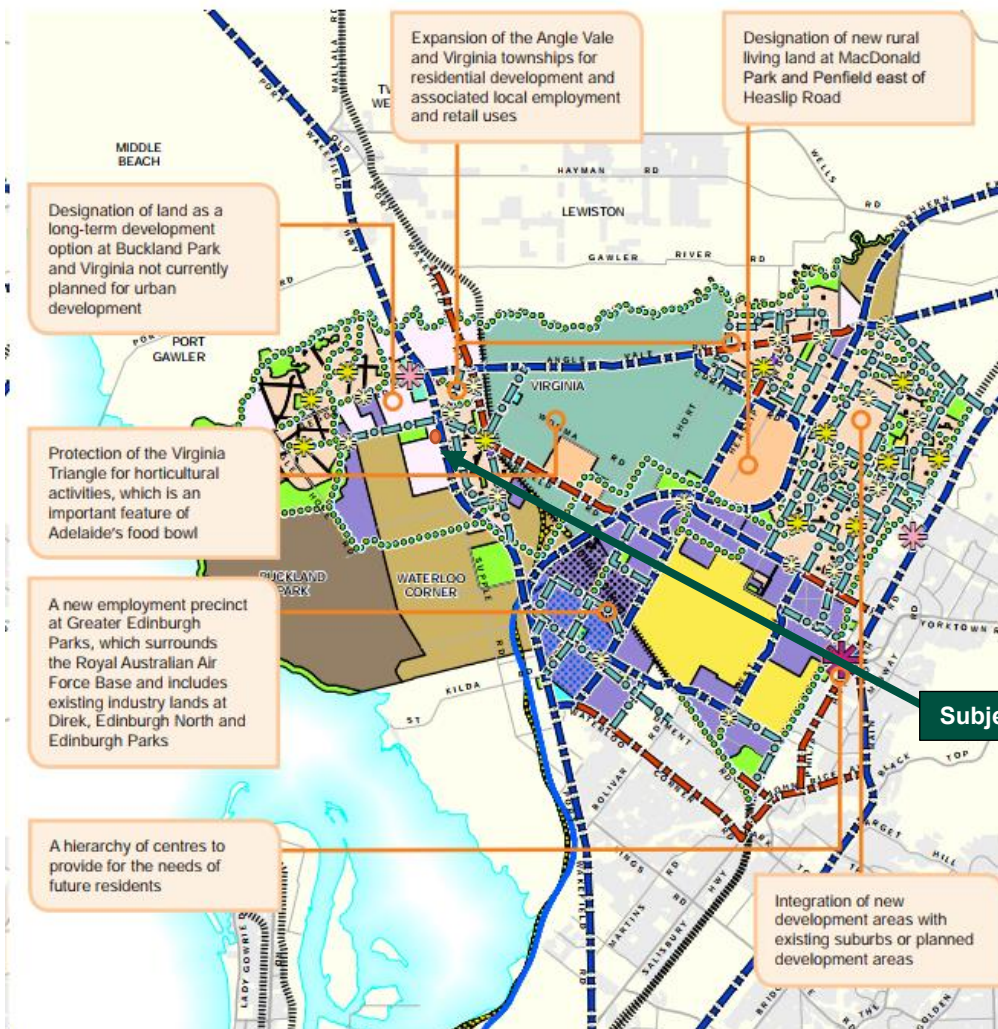
The subject site is located within the City of Playford. The City of Playford's 'State of the City' Report 2018 outlines "A focus on transitioning Playford into South Australia's Next Great City." This was informed by the December 2013 'Playford Growth Area Structure Plan.'

The Structure Plan identifies the subject site as a 'long-term development option' within a western zone which is centred on the 'Riverlea' development at Buckland Park but also envisages new development within the Buckland Park area south of Riverlea (refer to **Figure 2.6** on the following page). The Structure Plan envisages that public transport will be improved within the study area "by high frequency bus services will connect Buckland Park and Virginia to the Elizabeth Regional Centre and Elizabeth Station." The Structure Plan anticipates that Virginia, whilst being self contained..." will perform an important support role for the development of Buckland Park (opposite Port Wakefield Road)..."

The plan highlights that its implementation:

"...relies on landowners coordinating and committing to providing the necessary infrastructure, which may influence the way in which rezoning proceeds and when.... recognises the current fragmented land ownership pattern across the urban growth areas and the likelihood that infrastructure coordination and commitments will be met over time either by individual landowners or groups of landowners with a common goal, provided the overall Structure Plan vision can be met.."

[our emphasis]



Playford Growth Area Structure Plan Regional Structure Plan

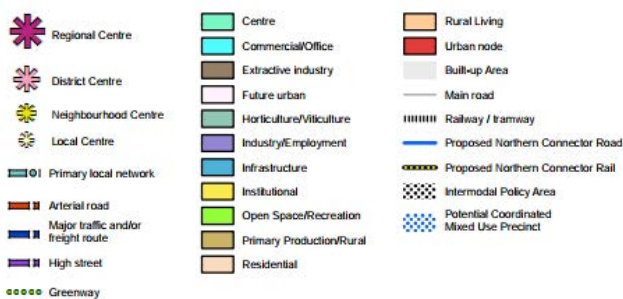


Figure 2-6 Playford Regional Growth Area Structure Plan

2.3. Existing Zone and Policy Framework

The subject land is located in the 'Rural Horticultural Zone' (see **Figure 2.7** below).

The Desired Outcomes of the Rural Horticultural Zone are:

- DO1** Intensive agriculture in the form of horticulture and associated value-adding enterprises and activities
- DO2** The establishment of appropriately scaled industries for washing, processing, bottling and packaging primary produce and servicing and supporting horticulture.
- DO3** Manage interface conflict between horticulture and other land uses.

The Rural Horticultural Zone does not contemplate urban expansion. Dwellings are permitted where on the same allotment and ancillary to a primary production and/or primary production related value-adding industry. Dwellings on their own allotment are not an envisaged form of development.

To the east of the site over Port Wakefield Highway is the 'Master Planned Township Zone' which encompasses the Virginia Grove development and 'Deferred Urban Zone'.

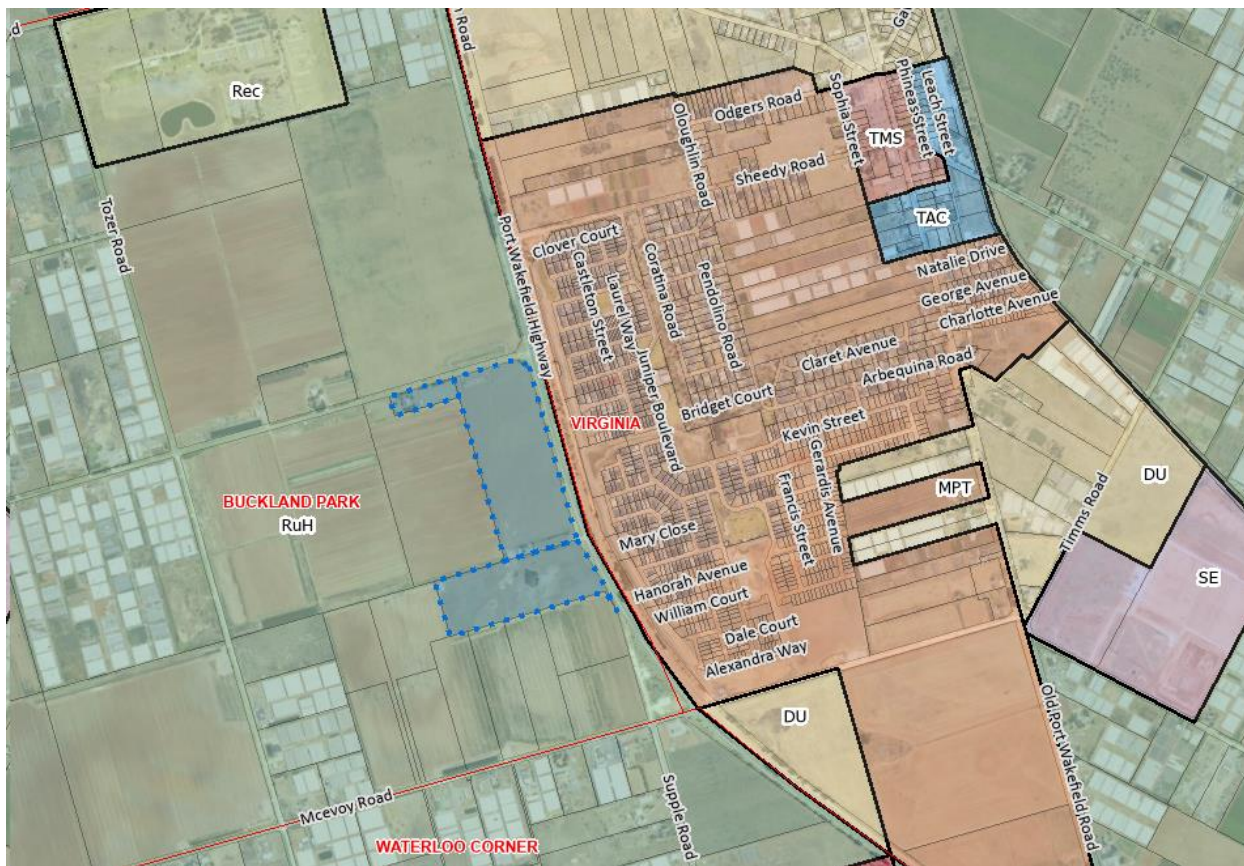


Figure 2-7 Existing Zoning (subject site identified in blue)

The subject land is located within the following 'Overlays' within the Planning & Design Code:

- Defence Aviation Area (All structures over 90 metres)
- Gas and Liquid Petroleum Pipelines
- Hazards (Bushfire - General)
- Hazards (Flooding - General)
- Limited Dwelling
- Limited Land Division
- Major Urban Transport Routes
- Native Vegetation
- Prescribed Wells Area
- Regulated and Significant Tree
- Traffic Generating Development
- Water Resources

The following Technical Numeric Variations (TNVs) are applicable to the subject site:

- Minimum site area is 10 ha;

Whilst the subject site also covered by the following Concept Plans TNVs, the subject site is either outside of the Concept Plan Boundary or no aspects of the Concept Plan impacts the subject site:

- Concept Plan (Concept Plan 14 - Buckland Park);
- Concept Plan (Concept Plan 21 - Virginia);
- Concept Plan (Concept Plan 22 - Virginia Infrastructure)
- Concept Plan (Concept Plan 81 - Edinburgh Defence Airfield Lighting Constraints)

3. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

3.1. Key Policy Directions

The Greater Adelaide Regional Plan (GARP) Discussion Paper identifies that current population projections demonstrate that by 2051 we must plan for an additional 670,000 people in Greater Adelaide, a 47% increase in current population.

The Paper outlines that we need to supply 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes. This is in addition to the existing 200,000 new homes already planned for in land already zoned for residential development (164,000 homes) and on land already identified for future residential rezoning (47,000 homes). The Discussion Paper identifies the need to therefore supply an additional 100,000 homes by 2051 or based on current estimates under a high growth scenario - we will run out of land for future residential development within 30 years unless an ongoing rezoning program is established.

The Discussion Paper has identified that growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success, and there is a clear desire to

concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure such as roads, schools, healthcare, water and public transport services.

A key strategy outlined within the Discussion Paper is to focus greenfield, satellite city and township growth along Adelaide's four major transport spines (including along the Port Wakefield Highway):

"The Commission is proposing four areas outside, or on the fringe of, metropolitan Adelaide to investigate for future housing and employment growth. These investigation areas extend from Adelaide's four major transport spines to leverage infrastructure investment. The Discussion Paper further details why these areas have been identified and the challenges associated with potential future growth."

The Paper projects that the highest proportion of new growth will be located within the 'Outer North' area, with almost 18,200 new homes or 18% of the projected growth within this area of Greater Adelaide (refer to **Figure 3.1** below).

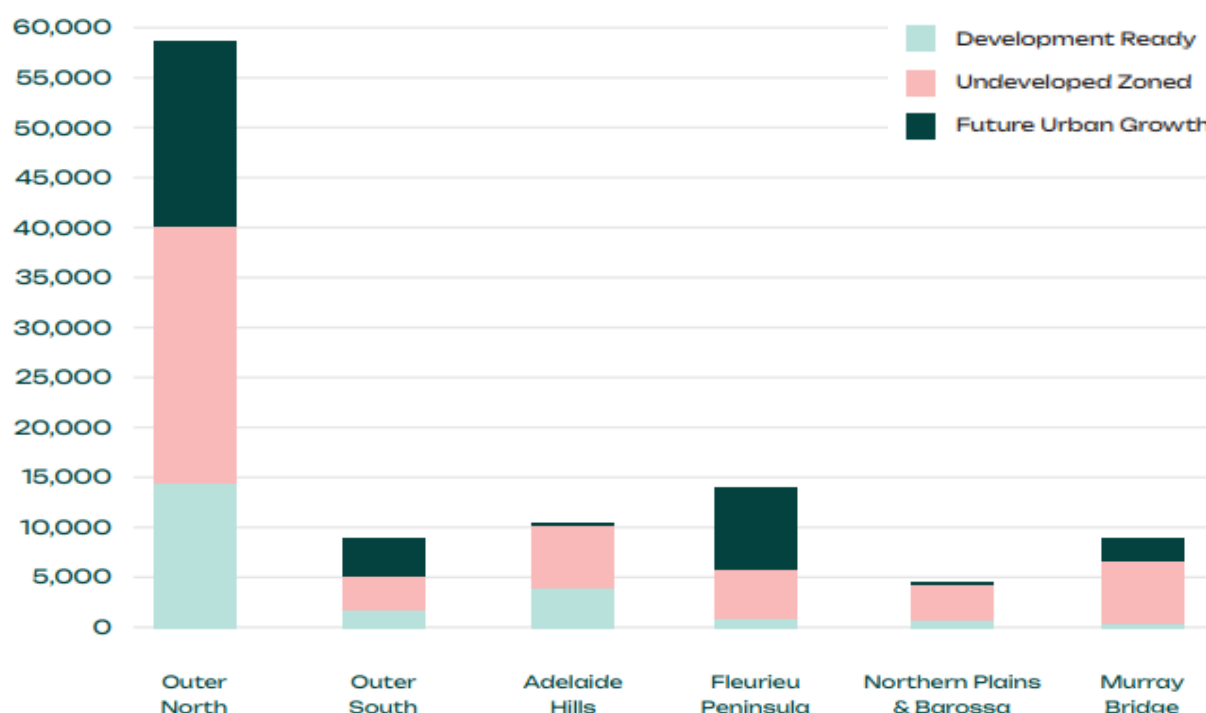


Figure 3-1: Projected Future Land Supply CBD

(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023, page 108)

The Discussion Paper identifies four (4) main greenfield 'Investigation Areas' on the fringe of Metropolitan Adelaide for future housing and employment growth, with these areas being based on the State Planning Commission's seven (7) identified land supply principles identified in the Paper.

The areas proposed for detailed investigation extend from Adelaide's four major transport 'spines' with the intent to capitalise on ongoing government investment along these growth corridors.

This includes a 'north-west spine' that begins at the southern end of the Port Wakefield Highway stretching northward past the Riverlea development to Two Wells, and then continues further north along the highway. As identified in Section 1, the subject site is located on this north-west spine.

The land to the north-west and west of Waterloo Corner is identified as a proposed 'Growth Investigation Area' for both housing growth, as identified on **Figure 3.2** and is located immediately north-west of land identified as a 'Growth Investigation Area' for future employment land at Edinburgh Parks (refer to **Figure 3.3**). We note the following challenges identified in the Discussion Paper for the 'north-west spine' and the suitability of the subject land to address each of the challenges identified:

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
<ul style="list-style-type: none"> - Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed. 	<p>The subject site is not located within the EFPA and is also identified with the City of Playford Regional Structure Plan as a 'future urban growth area.'</p>
<ul style="list-style-type: none"> - Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance. 	
<ul style="list-style-type: none"> - The area is currently not supported by high frequency public transport and would require significant investment in trunk infrastructure to support urban growth 	<p>Whilst the subject site is not currently supported by high frequency public transport, The City of Playford Regional Structure Plan identifies that future bus services are envisaged to provide a connection from Buckland Park and Virgina urban growth areas to Elizabeth.</p> <p>This growth, in addition to ongoing growth in other areas of Buckland Park, would support, underpin and justify future investment in public transport (such as high frequency bus routes). The City of Playford submission on the GARP identifies Port Wakefield Highway as a suitable corridor for high frequency transport investigations.</p>

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
<ul style="list-style-type: none"> - It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency 	<p>The subject land currently comprises primary production land. The GARP identifies an 'Employment Growth Investigation Area' to the south at Greater Edinburgh Parks and Gilman.</p> <p>Future urban residential growth over the subject site would provide affordable housing options within close proximity of these employment growth investigation areas. This will aid in workers having diverse housing options in close proximity to their workplace.</p>
<ul style="list-style-type: none"> - Hazards and environmental issue such as flooding would need to be considered and managed. 	<p>Early high-level analysis of the subject site has identified the ability to develop an appropriate response to the management of drainage across the site without the need for substantial earthworks and encouraging the collection, treatment and re-use of stormwater as part of a water sensitive urban design (WSUD) outcome.</p> <p>The City of Playford Regional Structure Plan has identified that stormwater flows from the broader Virginia and Buckland Park (south of Riverlea) area will be directed to Smith Creek and the Gawler River with the utilisation of stormwater detention basins/wetlands where required to manage downstream flows (refer to Figure 4.1).</p>

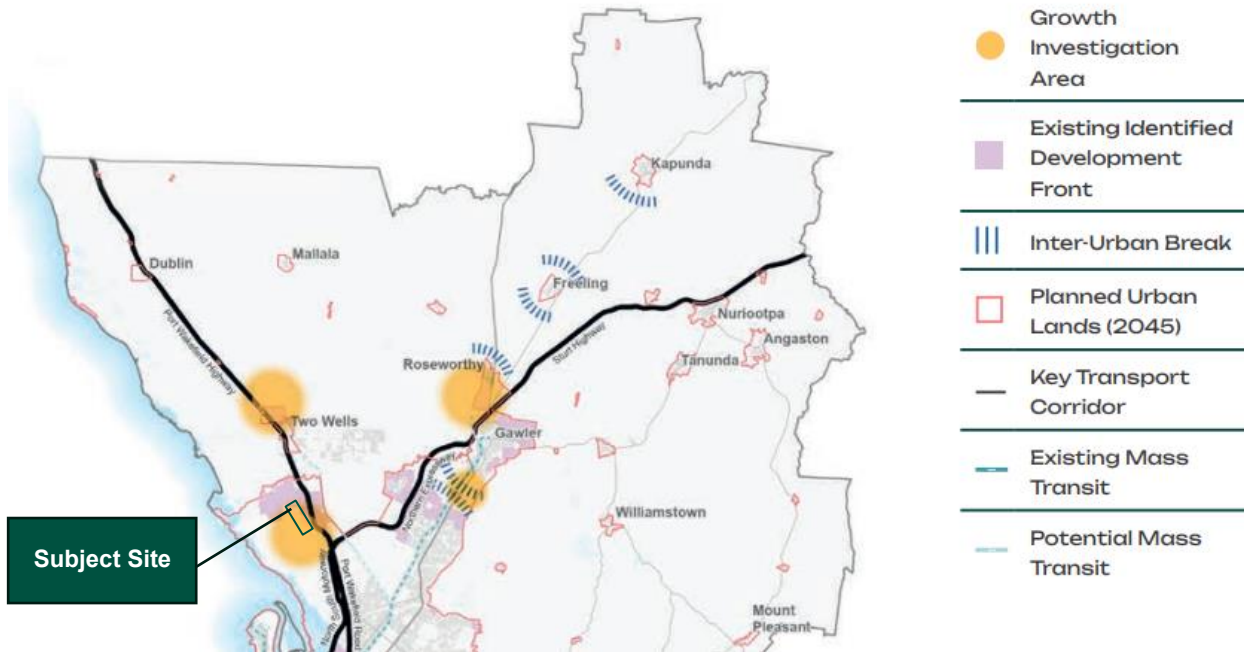


Figure 3-2: Proposed 'Growth Investigation Areas', north of Adelaide CBD
(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023)

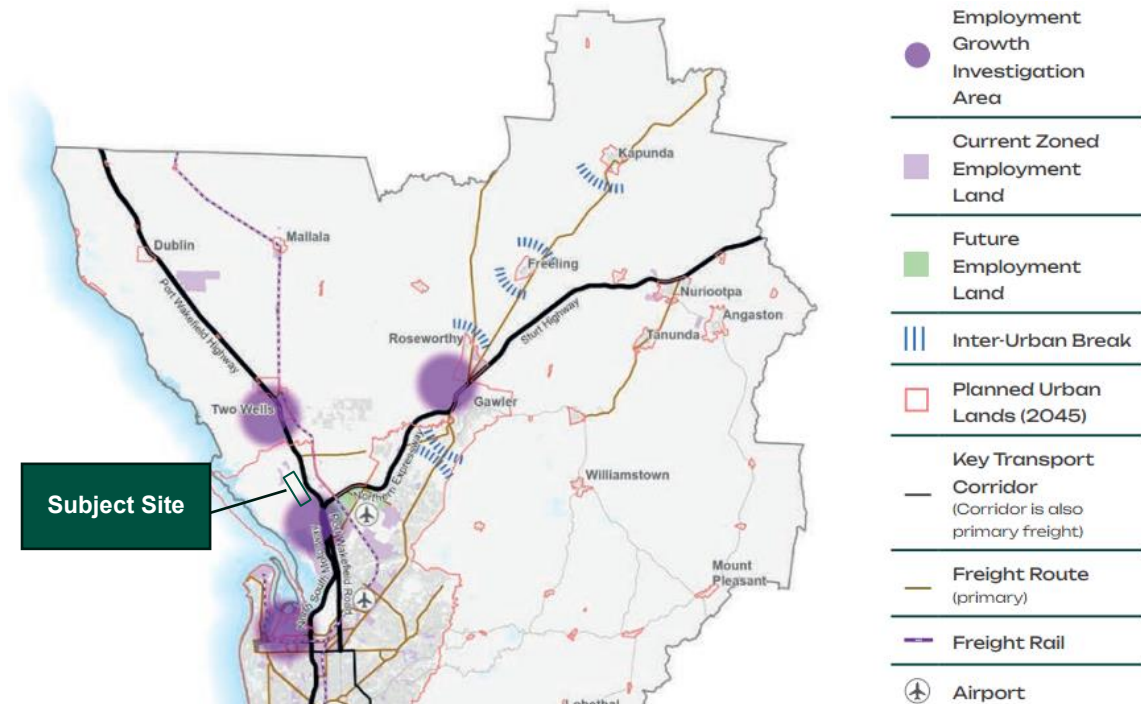


Figure 3-3: Proposed 'Employment Growth Investigation Areas', north of Adelaide CBD
(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023)

3.2. City of Playford Submission

On 10 October 2023 the City of Playford adopted its submission on the GARP. In regard to land south of Riverlea (which includes the subject land), the Council resolved that the identification of land south of Riverlea for future residential growth in the GARP is only supported if:

- It is acknowledged that this is a longer-term option when current growth areas in Playford have been significantly developed. The report identifies that this land should not be considered for development until land zoned for urban growth has been largely developed and identifies that Playford currently has land zoned for residential development in multiple locations including Playford Alive, Blakes Crossing, Virginia, Angle Vale, Playford North Extension, Riverlea, Eyre;
- These separate locations and fragmented nature of land which many of these areas are creating significant infrastructure, staging, and financial challenges for Council and its community;
- Any future development south of Riverlea will need to consider the following key matters:
 - » Appropriate staging of growth and infrastructure provision;
 - » How this land will be integrated with the existing Riverlea growth area;
 - » The potential impact of loss of horticultural land;
 - » Potential impact on Aboriginal cultural heritage;
 - » Stormwater and flooding mitigation requirements;
 - » Transport needs – road, public transport and active travel;
 - » Identifying a best-practice funding model for provision of infrastructure; and
 - » Ensuring relevant State agencies, such as SA Water, DECD and DIT align their capital works plans with the staging of growth to adequately service the new community.

As outlined in **Section 2.1.5** of this submission, the subject site is already serviced by road, electrical and water infrastructure and (subject to investigation) may be able to be connected into mains sewer. Notwithstanding, Sheedy understands that there may be the need to enter into infrastructure deeds/agreements to ensure a co-ordinated approach to infrastructure provision across the land and locality as identified within the GARP for 'Growth investigation Area'(refer to **Section 4.2**).

Appendix B of the City of Playford submission, outlined transport upgrades required to support future residential growth in the area (refer to **Figure 3.4** on the following page), including a second intersection with Port Wakefield Highway along with investigation into rapid mass transit along Port Wakefield corridor.

The subject site being situated on the corner of Thompson Road and Port Wakefield Highway would be well positioned to accommodate future residential growth adjacent a rapid mass transit corridor if the Council's submission is to be adopted.

Appendix B: Transport Upgrades

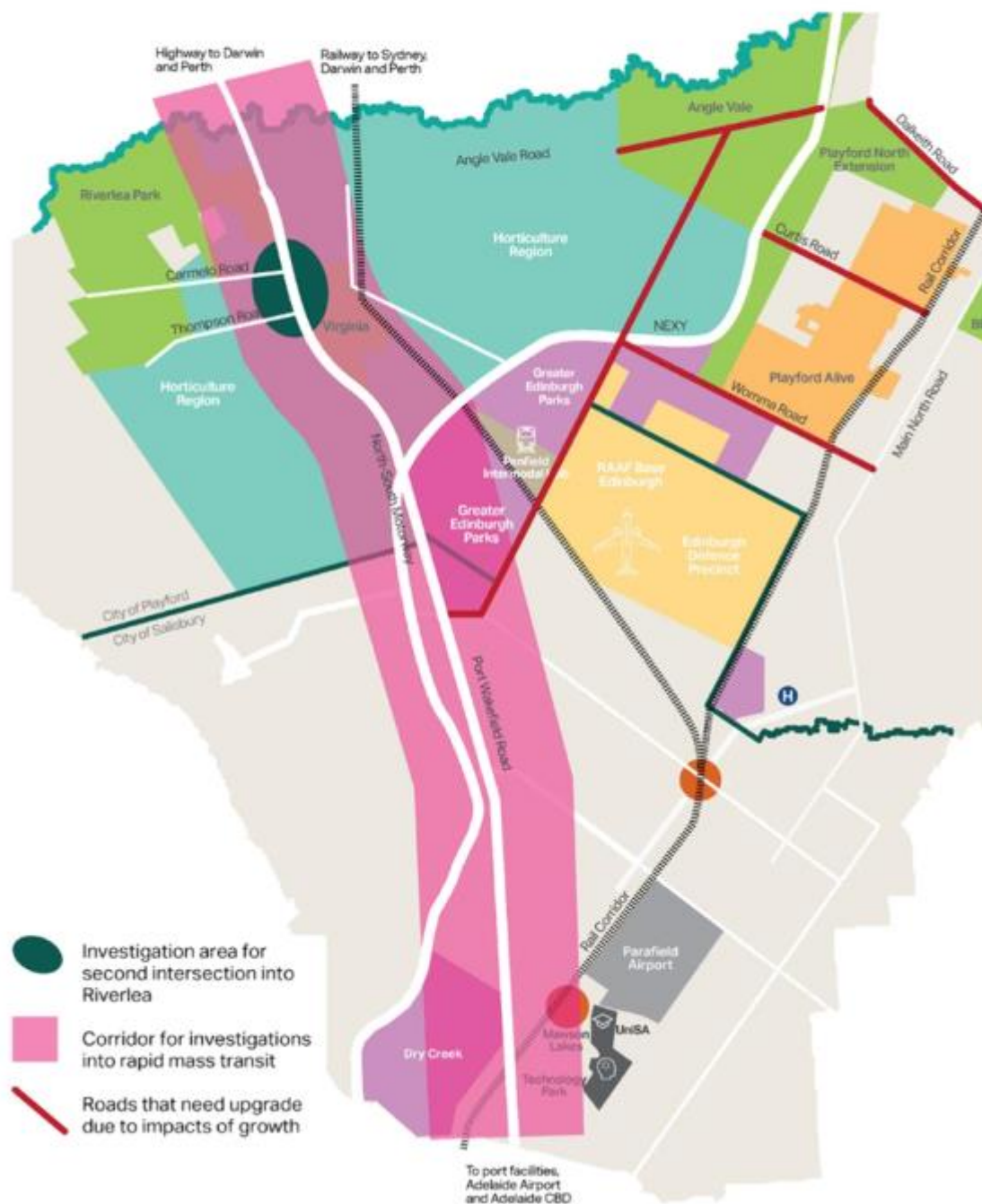


Figure 3-4 City of Playford GARP Submission, Transport Upgrades.

4. SUITABILITY OF THE SUBJECT LAND FOR FUTURE URBAN DEVELOPMENT

4.1. Subject Land (Potential) Capacity

Assuming a conservative yield of 10 dwellings per hectare (gross) and land area of 22 hectares, the subject land could yield in the order of 220 dwellings. This would amount to an additional 1.2% supply of the 18,200 projected supply in the Outer North Area of Greater Adelaide.

Based on a limited desktop' assessment of the site, we are of the opinion that the site would have limited constraints that would prevent future development achieving this dwelling yield given:

- Productive land - the site is not located within the EFPA boundary nor is it located within the 'Virginia Horticulture District' for horticultural activities identified in the City of Playford's December 2013 Growth Area Structure Plan;
- Topography - the land is relatively flat and not topographically constrained for future development options;
- Transport and Access – the site currently has access directly to Port Wakefield Highway and via Thompson Road to Port Wakefield Highway;
- Native vegetation – the site has been predominantly cleared of vegetation and is being used for primary production purposes. Mature vegetation is confined to the perimeter of the site and adjacent site boundaries where it could likely be retained and accommodated in any future development of the subject land;
- Heritage – there are no State or local Heritage Places on the subject land and a Taa Wika search of registered Aboriginal Sites and Objects has identified no existing record of any Aboriginal sites or objects on the subject land; and
- Flooding – whilst the current Hazards (Flooding – General) Overlay is applied to the site, any areas of existing flooding or drainage areas could be suitably mitigated through an engineered response in a future development of the subject site including possible incorporation of any required stormwater conveyance and detention in open space reserves and corridors in accordance with the City of Playford Growth Area Structure plan that envisages stormwater flows to be directed towards to Smith Creek (refer to **Figure 4.1** on the following page).

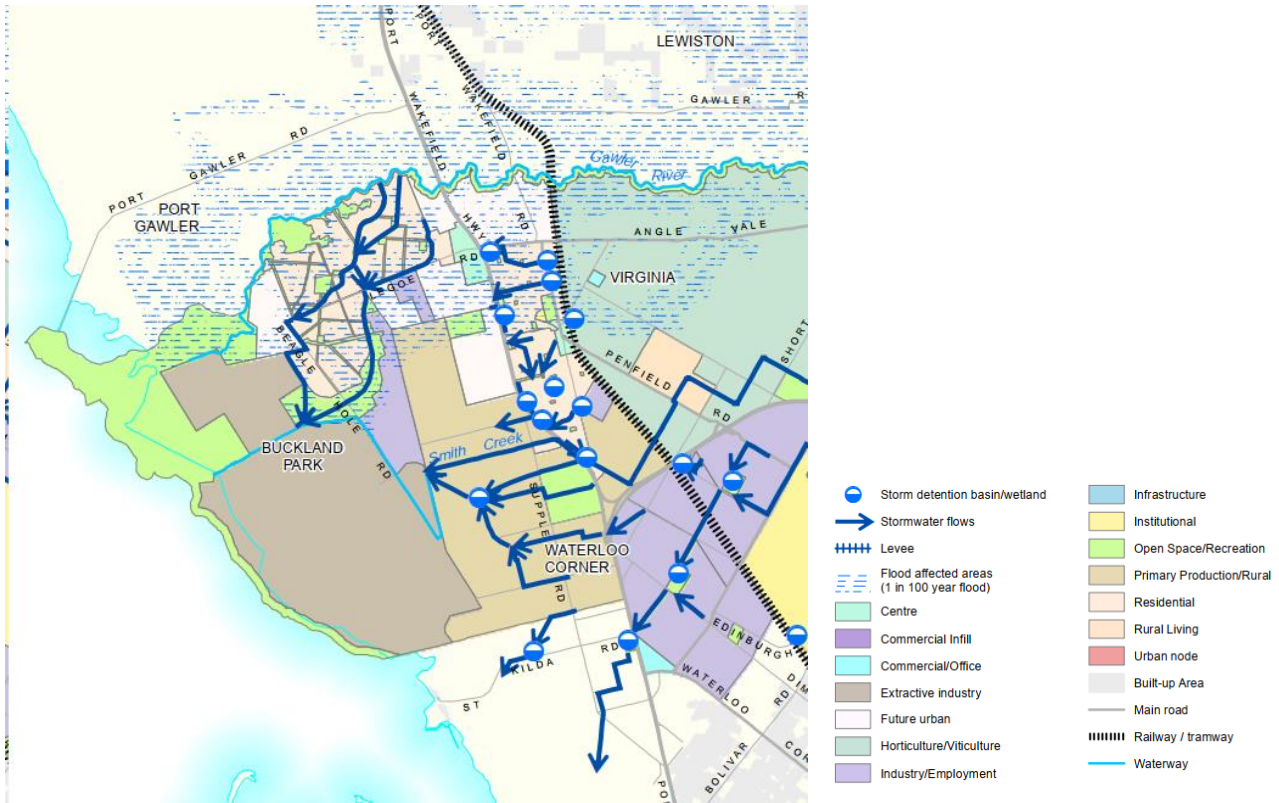


Figure 4-1 City of Playford Growth Area Structure Plan- Proposed Stormwater and Flooding Infrastructure

4.2. Infrastructure and Servicing

Sheedy recognise and understand that it may be necessary to enter into an infrastructure agreement to ensure the provision of the necessary services (i.e. any augmentation of water, road, sewer and stormwater infrastructure) to serve the future community, which would likely occur prior to the authorisation of a Code Amendment to rezone the land. This infrastructure agreement could be in the form of a Deed registered against the land via a Land Management Agreement (LMA) or alternatively a 'Basic Infrastructure Scheme' managed by an independent scheme coordinator pursuant to Part 13 (Infrastructure Frameworks) of the Planning Development and Infrastructure Act 2016.

4.3. Propensity for Development

The 22 hectare consolidated land parcel is under a single ownership and Sheedy support:

- The identification of the subject land as a future urban growth area; and
- The immediate initiation of a Code Amendment to rezone the land and facilitate future urban development and housing.

The physical features of the site are conducive to future urban development with the site having minimal gradient and generally being cleared to accommodate the existing farming use.

The subject site therefore has a strong propensity for future development and delivery to market should it be identified as a future urban growth area to contribute to the supply of affordable housing across Greater Adelaide.

5. CONCLUSION

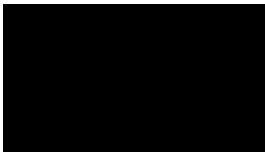
This submission is provided to assist the State Planning Commission's upcoming review of the Regional Plan for Greater Adelaide.

We are of the opinion that the subject land would be a logical and sequential extension and expansion of the Buckland Park growth area as identified in the GARP Discussion Paper Growth Investigation Area to meet the future land supply needs for Greater Adelaide.

Sheedy therefore request that the entirety of the subject site is considered for identification as a 'future urban growth area in the next iteration of the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years).

Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

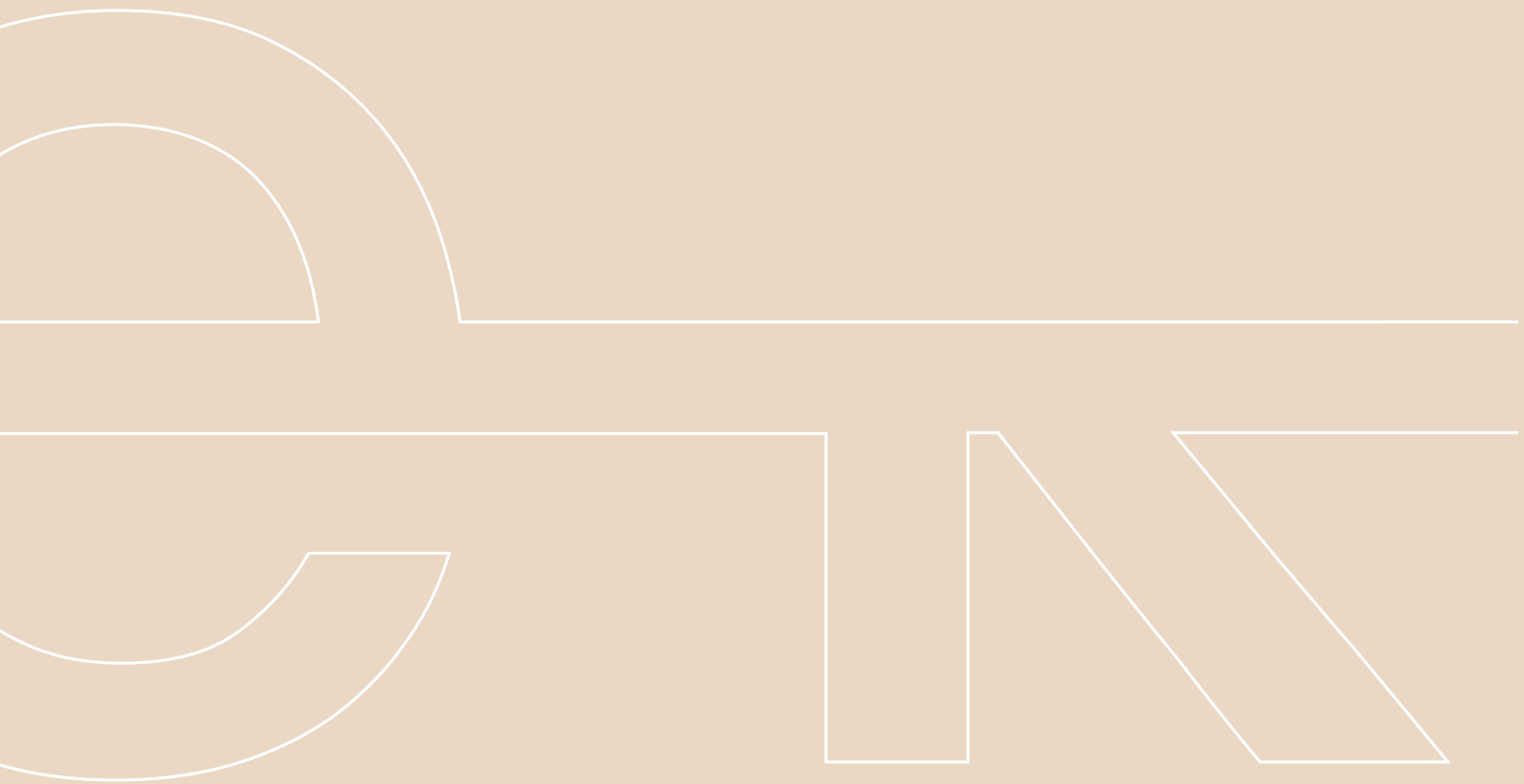
Yours Sincerely,



Rick Hutchins

Associate

CC: KJ & KM Sheedy & CT Sheedy



DTI:PlanSA Submissions

From: Sarah Lowe [REDACTED]
Sent: Monday, 6 November 2023 1:44 PM
To: DTI:PlanSA Submissions
Cc: Joe Emanuele - NEISUZU; Tony Emanuele; Michelle Papalia; Steve Choimes - Bargainsteelcentre; Grazio Maiorano
Subject: GARP Discussion Paper Submission - Port Wakefield Road
Attachments: 230911 V1 GARP Submission.pdf

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Good afternoon,

Please find attached a submission prepared on behalf of C & E Choimes Superannuation Fund Pty Ltd, S & H Choimes Superannuation Fund Pty Ltd and T & J M2 Investment Holdings Pty Ltd ATF T & J M2 Investment Holdings Trust (our clients).

Kind regards,

Sarah



Sarah Lowe
Consultant
[REDACTED]

27 Halifax Street
Enter via Symonds PI
Adelaide SA 5000
08 8333 7999

Kaurua Country

My working hours are:
Monday to Friday 8.30am-5.00pm

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6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Greater Adelaide Regional Plan (GARP) Discussion Paper Submission – 1113 to 1131 Pt Wakefield Rd, Waterloo Corner

URPS acts for C & E Choimes Superannuation Fund Pty Ltd, S & H Choimes Superannuation Fund Pty Ltd and T & J M2 Investment Holdings Pty Ltd ATF T & J M2 Investment Holdings Trust (our clients). Our client has submitted a Proposal to Initiate a Code Amendment, which has the support of the City of Salisbury.

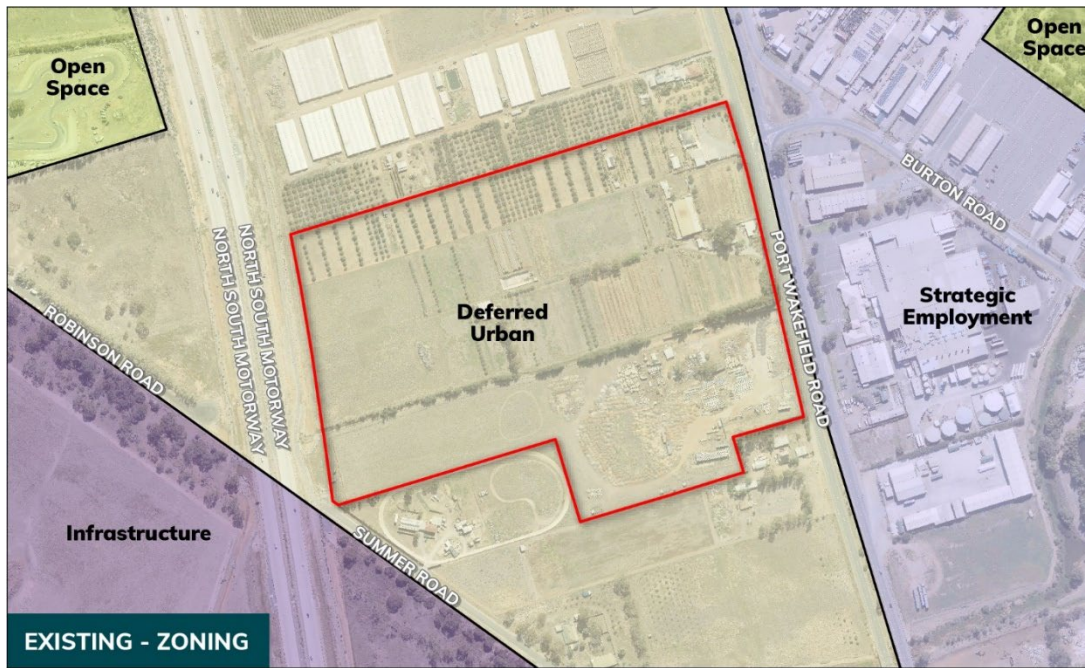
The Discussion Paper (Paper) currently on consultation seeks to stimulate debate on how the GARP will help deliver the 300,000 additional homes (and associated employment land) possibly needed over the next 30 years.

Affected Area

Our clients own 9 parcels of land in Waterloo Corner (the Affected Area):

- 1113-1117 Port Wakefield Road, Bolivar (CT5083/129)
- 1113-1117 Port Wakefield Road, Bolivar (CT5083/130)
- 1119-1123 Port Wakefield Road, Waterloo Corner (CT6177/742)
- 1131-1135 Port Wakefield Road, Waterloo Corner (CT5218/82)
- 1131-1135 Port Wakefield Road, Waterloo Corner (CT5871/642)
- 1131 -1135 Port Wakefield Road, Waterloo Corner (CT5218/83)
- 1131-1135 Port Wakefield Road, Waterloo Corner (CT6178/375)
- 1125-1129 Port Wakefield Road, Waterloo Corner (CT6177/615)
- 73-79 Summer Road, Bolivar (CT6178/269)

The Affected Area is outlined red and currently zoned Deferred Urban as illustrated below. Our clients seek to change this to an Employment Zone via a Code Amendment. The Employment Zone envisages a range of low-impact light industrial, commercial and business activities that complement the role of other zones accommodating significant industrial, shopping and business activities.



Requested Action

Our clients:

- Support the Paper, where it expressly identifies Port Wakefield / Bolivar as an “Employment Growth Investigation Area” (Figure 15 of the Paper); and
- Request that the GARP ultimately identifies the Affected Area as future employment land.

Justification

Consistent with the Intent of the Discussion Paper

The Paper indicates Greater Adelaide's population could grow by 670,000 people in the next 30 years, requiring targeted greenfield and infill development to provide appropriate housing and employment for these people. Easily accessible employment land is therefore crucial to support population and business growth.

Further, the Paper suggests that the consumption rate of employment land has increased since the Covid-19 pandemic and additional employment land may need to be brought online in about 10 years to maintain a 15-year rolling supply (page 151).

The Paper identifies 4 growth areas outside of metropolitan Adelaide. One of the growth areas includes the 'north-western spine' which runs along Port Wakefield Road, capturing the Affected Area.

Page 119 of the Paper identifies this as "as an investigation area for future residential/employment activities because":

- It builds on and leverage the current development activity and population growth already planned for (eg Riverlea and Two Wells which will accommodate 15,000 new dwellings over the short to medium term).
- It makes use of significant investment in completed road infrastructure, as well as infrastructure that is planned as part of the other large developments nearby.
- The topography of the land does not present challenges.
- It has lower primary production value than other high-quality land in the north.
- It is well connected to strategic employment lands nearby.

The Affected Area enjoys all of the characteristics above which make it suitable for employment purposes. In particular:

- It supports a significant population catchment to the south-east, and growing population centres to the north including Virginia.
- It is zoned Deferred Urban, which effectively means it has been set aside to accommodate urban growth in the future.
- It is wedged between Port Wakefield Road and the North South Motorway. It is also wedged between Infrastructure and Strategic Employment Zones. This context is not suited to providing a high-quality residential environment. Clearly it is best suited to providing employment land that is integrated with traffic networks and is compatible with surrounding zones.
- The proximity of the Affected Area to Port Wakefield Road, North South Motorway and Northern Expressway should be leveraged.

Not only is the Affected Area suitable for employment purposes, our clients are eager to work with Council, the Commission and state agencies to actually deliver upon the potential of the land, as demonstrated by their pursuit of a Code Amendment.

We suggest that this commitment from our client should be recognised and prioritised within the GARP.

Few Alternative Land Use Options under the Current Situation

The Deferred Urban Zone is highly restrictive, stating that “Development that is incompatible, prejudicial or detrimental to the orderly and efficient servicing and conversion of the land for future urban growth does not occur” (PO 1).

We contend that it is the right time to rezone the Affected Area because of its integration with infrastructure and the surrounding urban land as discussed above.

Aligned with State Planning Policies

State Planning Policies (SPPs) represent the highest level of policy in the planning system and address the economic, environmental and social planning priorities for South Australia.

The development intent of our client is aligned with several SPPs relevant to the Discussion Paper, as summarised in the table below.

SPP	Ideas for the GARP in relation to greater housing choice in the right places	Alignment to our Submission
SPP 1 – Integrated Planning	<ul style="list-style-type: none"> Identify employment land supported by strategic infrastructure. 	The Affected Area will capitalise of recent investment in road infrastructure. More broadly it aligns with growth of the northern region and the need for additional employment opportunities.
SPP 8 – Primary Industry	<ul style="list-style-type: none"> Protect key assets underpinning current and future primary industries. 	<p>The Affected Area no longer has value as primary industry.</p> <p>Facilitating urban growth over the Affected Area will reduce pressure on primary industry assets which are more valuable and productive.</p>
SPP 9 – Employment Lands	<ul style="list-style-type: none"> Identify sufficient employment lands in appropriate locations to meet future demand for traditional and new industries 	The Affected Area is strategically located on major transport routes and in proximity to growing residential areas. Future land uses are already identified and are awaiting the Code Amendment to come to fruition.

Conclusion

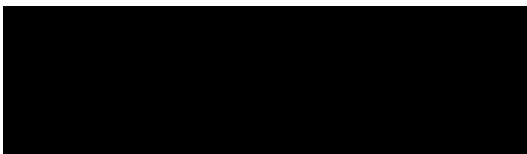
We support the intent of the Discussion Paper, including the identification of an “Employment Growth Investigation Area” over the Affected Area.

Further, our clients request that the Affected Area is clearly confirmed as future employment land within the GARP because:

- This proposal is closely aligned with the intent of the Discussion Paper as well as the State Planning Policies.
- The Affected Area is well suited to employment purposes as:
 - It will support significant population catchments nearby (existing and future).
 - It is zoned Deferred Urban, so it has already been earmarked for urban growth.
 - Its location between major roads and non-residential zones means it is best suited to employment purposes rather than residential.
 - It will leverage significant investments, road infrastructure and development activity nearby.
- The existing Deferred Urban Zoning is highly restrictive and we contend that it is the right time to rezone the Affected Area.

We are keen to work with the Commission, government agencies and Council to ensure the development of this land and the delivery of the identified employment objectives.

Yours sincerely



Sarah Lowe
Consultant

DTI:PlanSA Submissions

From: Rick Hutchins [REDACTED]
Sent: Saturday, 4 November 2023 4:42 PM
To: DTI:PlanSA Submissions
Cc: suzanne merenda; Penfield Grove; [REDACTED] Cousins Produce
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper (Penfield Gardens)
Attachments: 01477_009_20231103_GARP Submission_Penfield Gardens.pdf

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Please find attached a submission on behalf of the owners of land in Penfield Gardens.

Please contact me on the below details should you have any queries or require further information.

Kind regards,

Rick Hutchins
Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000



www.ekistics.com.au

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

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3 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: Submission on the Greater Adelaide Regional Plan Discussion Paper – Opportunity for Future Urban Growth – Land at Penfield Gardens

We act for the owners of six allotments of land located on Curtis Road, Heaslip Road and Broadacres Drive at Penfield Gardens.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper and for seeking stakeholder and community input to inform the preparation of the next Regional Plan for Greater Adelaide.

This submission has been prepared in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper') and seeks the State Planning Commission's (SPC) consideration of the 'subject land' as a potential future urban growth area.

It is our opinion that the land holding, located immediately adjacent Angle Vale, presents an opportunity to provide additional urban lands to support residential land supply that capitalises on investment and infrastructure already undertaken in the area.

1. SITE AND LOCALITY OVERVIEW

1.1. Land Description/Identification

The subject land is located on the corner of Curtis Road, Heaslip Road and Broadacres Drive and is illustrated in **Figure 1.1** below.

The subject land is formally described in the following Certificates of Title:

- 1) Certificate of Title Volume 6145 Folio 313 (Allotment 32 in Deposited Plan 8453);

- 2) Certificate of Title Volume 6278 Folio 389 (Allotment 10 in Deposited Plan 13060);
- 3) Certificate of Title Volume 5214 Folio 223 (Allotment 31 in Deposited Plan 8453);
- 4) Certificate of Title Volume 5157 Folio 291 (Allotment 30 in Deposited Plan 8453);
- 5) Certificate of Title Volume 5563 Folio 726 (Allotment 2 in Deposited Plan 9167); and
- 6) Certificate of Title Volume 5301 Folio 565 (Allotment 3 in Deposited Plan 9167).

As a combined 'site', the allotments have an approximate area of 24 hectares with frontages of approximately 560 metres to Curtis Road, 430 metres to Heaslip Road and 430 metres to Broadacres Drive.

The site has no significant apparent gradient and only has small areas of mature vegetation generally located near the property boundaries and road frontages.

Of the six allotments, two are currently used for 'limited' food production. One for hydroponic lettuces and one a small olive plantation. The allotment on the corner of Curtis Road and Heaslip Road had glasshouses which were removed over 10 years ago due to lack of quality water supply. The centre allotment on Heaslip Road had a vineyard plantation which has died due to lack of water and has not been replaced. To our knowledge the other two allotments have never been used for food production.



Figure 1.1 Subject Land

Photos of the existing land are included as **Figure 1.2** below.



Figure 1.2 – Photographs of the Subject Land

1.2. The Locality

The subject land is located adjacent the southern boundary of the Angle Vale township where land is located within the **‘Master Planned Township Zone’**. In particular, the subject land is located: :

- Immediately south of ‘The Entrance’ master planned community by Fairland (see **Figure 1.3**) which when completed in 2030 will comprise 750 new homes with an expected population of 1,650 residents; and
- To the south-west of the ‘Miravale’ master planned community by Lanser Communities of around 840 allotments which is expected to be completed in 2029 (see **Figure 1.4**).



Figure 1.3 – Master Plan for 'The Entrance, Angle Vale' (Source: www.anglevale.com.au, Downloaded, 23/10/2023)



Figure 1.4 – Miravale (Source: www.miravale.com.au, Downloaded 23/10/2023)

There is a ‘**Suburban Activity Centre Zone**’ located some 650m north of the subject land along Heaslip Road which is intended to include a neighbourhood-scale shopping, business, entertainment and recreation facilities to provide a focus for business and community life and most daily and weekly shopping needs of the community.

To the east of Heaslip Road, land is located in the ‘**Rural Living Zone**’ with a Desired Outcome (DO) for ‘A spacious and secluded residential lifestyle within semi-rural or semi-natural environments, providing opportunities for a range of low-intensity rural activities and home-based business activities that complement that lifestyle choice’.

To the south and west land is within the ‘**Rural Horticultural Zone**’ which is part of the Virginia Horticultural District.

Curtis Road and Heaslip Road are major roads within the locality providing connection through the local area and direct connection with the Northern Expressway. Heaslip Road is a State Maintained Road (identified as a Type A Road in SAPPA) and is also an identified freight route. Curtis Road is identified in SAPPA as a Type A road east of the subject land, and a Type B Road adjacent the subject land and extending to its connection with Angle Vale Road.

The southern side of the intersection between Curtis Road and Heaslip Road (including part within the subject land) is identified for future road widening as part of local road network improvements to support the growing residential community and population in the local area.

2. EXISTING ZONE & POLICY FRAMEWORK

The subject land is located in the **Rural Horticultural Zone** (see **Figure 2.1 below**).

The Desired Outcomes of the **Rural Horticultural Zone** are:

- DO1 Intensive agriculture in the form of horticulture and associated value-adding enterprises and activities
- DO2 The establishment of appropriately scaled industries for washing, processing, bottling and packaging primary produce and servicing and supporting horticulture.
- DO3 Manage interface conflict between horticulture and other land uses.

The Rural Horticultural Zone does not contemplate urban expansion. Dwellings are permitted where on the same allotment and ancillary to a primary production and/or primary production related value-adding industry. Dwellings on their own allotment are not an envisaged form of development.

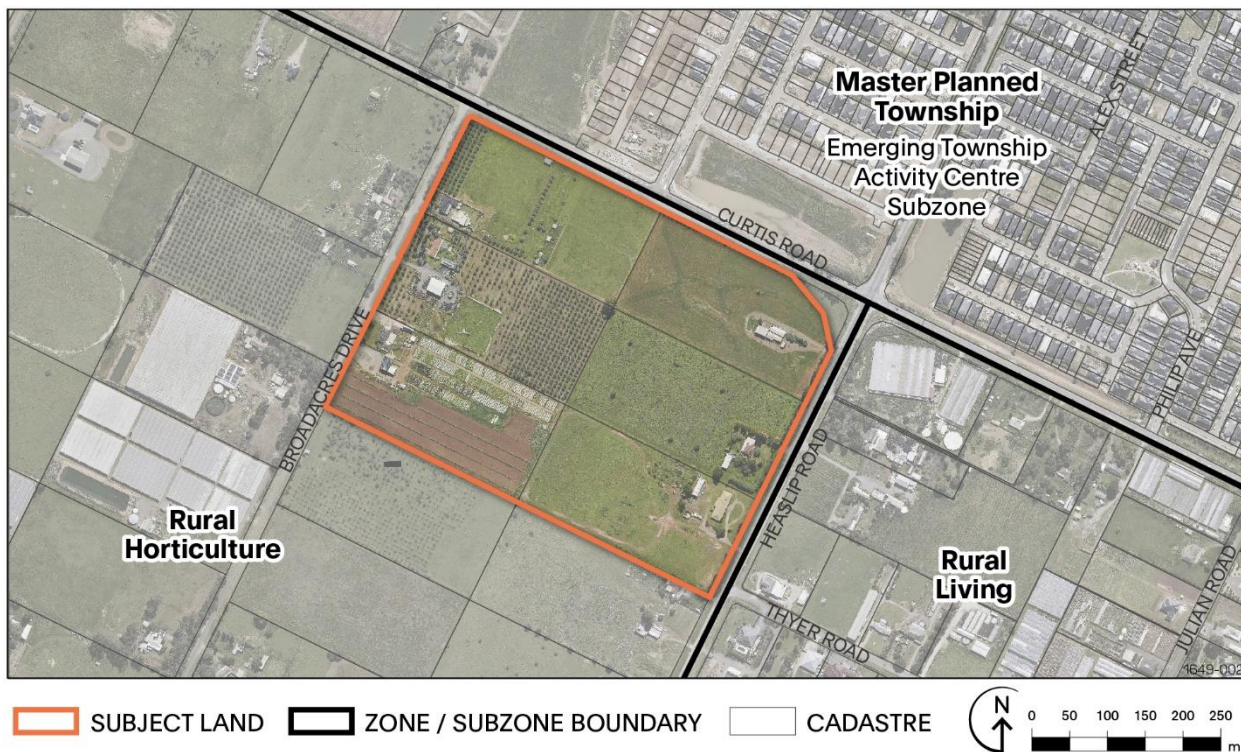


Figure 1.2 – Current zoning of subject land and surrounding area

The subject land is located within the following Overlays within the Planning & Design Code:

- Building Near Airfields
- Defence Aviation Area - All structures over 15 metres
- Environment and Food Production Area
- Future Road Widening
- Gas and Liquid Petroleum Pipelines
- Hazards (Bushfire – General Risk)
- Hazards (Flooding - General)
- Limited Dwelling
- Limited Land Division
- Major Urban Transport Routes
- Prescribed Wells Area
- Regulated and Significant Tree
- Traffic Generating Development

2.1. Environment & Food Production Area (EFPA)

The subject land is located within the **Environment & Food Production Area** (EFPA). Introduced in 2017, the EFPA was established to protect valuable rural, landscape, environmental and food production areas surrounding metropolitan Adelaide from urban encroachment. Land division for residential purposes is prevented within the EFPA.

Section 7(10) requires the Commission to undertake a review on a 5 yearly basis.

Following the first review of the EFPA boundary conducted in 2021, the State Planning Commission declined to revise the boundaries of the EFPA (other than to address some minor boundary anomalies), having formed the view that sufficient land remained available to support housing and employment growth for a projected 15-year timeframe.

Importantly, the 'Greater Adelaide Regional Plan Discussion Paper' ('Discussion Paper') identifies that the Commission will review future long term (16 to 30 years) growth opportunities within the EFPA as part this review. This is discussed further in Section 3 below.

2.2. Virginia Horticultural District

The subject land is located within the area identified as the 'Virginia Horticultural District' in the current 30 Year Plan for Greater Adelaide as identified in **Figure 2.2** below.

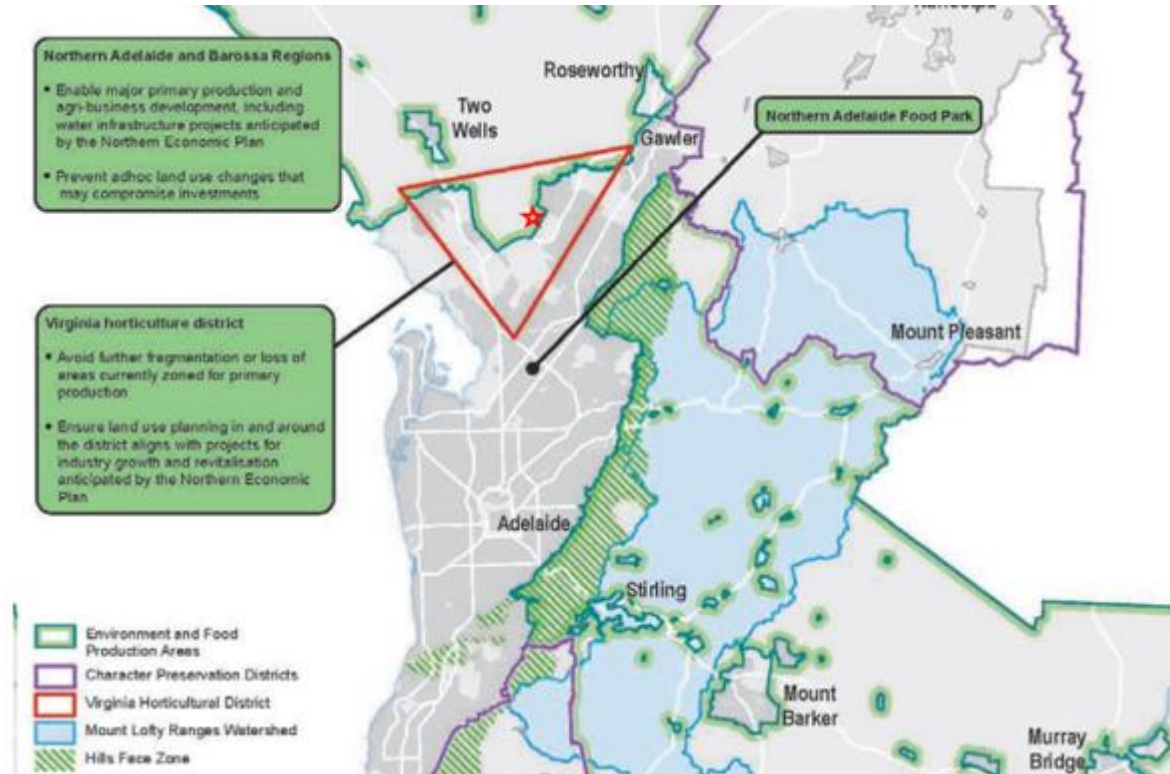


Figure 2.2 – Virginia Horticultural District (Source: 30 Year Plan – 2017 Update, p81)

In relation to the 'Virginia Horticulture District', the 30 Year Plan seeks to:

- Avoid further fragmentation or loss of areas currently zoned for primary production; and
- Ensure land use planning in and around the district aligns with projected industry growth and revitalisation anticipated by the Northern Economic Plan.

3. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

3.1. Key Policy Directions

The Greater Adelaide Regional Plan (GARP) Discussion Paper identifies that current population projections demonstrate that by 2051 we must plan for an additional 670,000 people in Greater Adelaide, a 47% increase in current population.

The Paper outlines that we need to supply 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes. This is in addition to the existing 200,000 new homes already planned for in land already zoned for residential development (164,000 homes) and on land already identified for future residential rezoning (47,000 homes). The Discussion Paper identifies the need to therefore supply an

additional 100,000 homes by 2051 or based on current estimates under a high growth scenario - we will run out of land for future residential development within 30 years unless an ongoing rezoning program is established

The Discussion Paper has identified that growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success, and there is a clear desire to concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure such as roads, schools, healthcare, water and public transport services.

A key strategy outlined within the Discussion Paper is to focus greenfield, satellite city and township growth along Adelaide's four major transport spines (including along the Northern Expressway):

"The Commission is proposing four areas outside, or on the fringe of, metropolitan Adelaide to investigate for future housing and employment growth. These investigation areas extend from Adelaide's four major transport spines to leverage infrastructure investment. The Discussion Paper further details why these areas have been identified and the challenges associated with potential future growth."

This includes a 'north-east spine' that begins at Kudla and continues north through Evanston Gardens then along the Northern Expressway, past Redbanks Road, towards Roseworthy. The Discussion Paper identifies that the investigation of this area would include the establishment of an inter-urban break in the form of northern parklands that separate Gawler from the City of Playford.

Kudla and the 'Growth Investigation Areas' along the north-east spine are located to the north of the subject land, as illustrated on **Figure 3.1** below

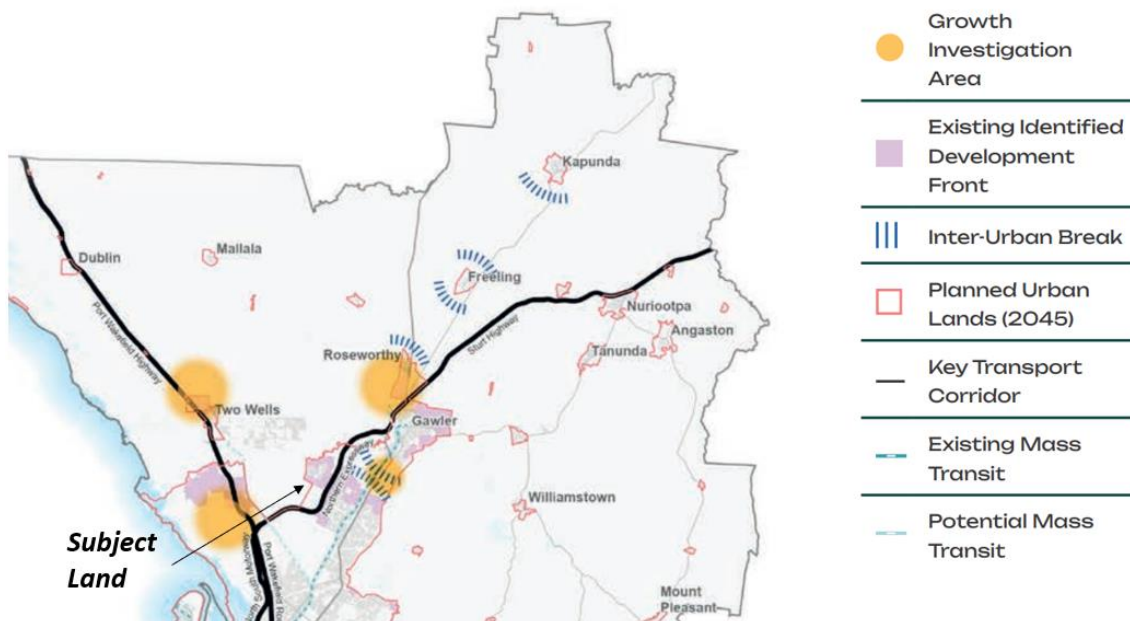


Figure 4.2: Proposed 'Growth Investigation Areas', north of Adelaide CBD

(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023, page 126)

The Discussion Paper projects that the highest proportion of new growth will be located within the 'Outer North' area, with almost 59,000 new homes or 19% of the projected growth within this area of Greater Adelaide (refer to **Figure 3.2** below).

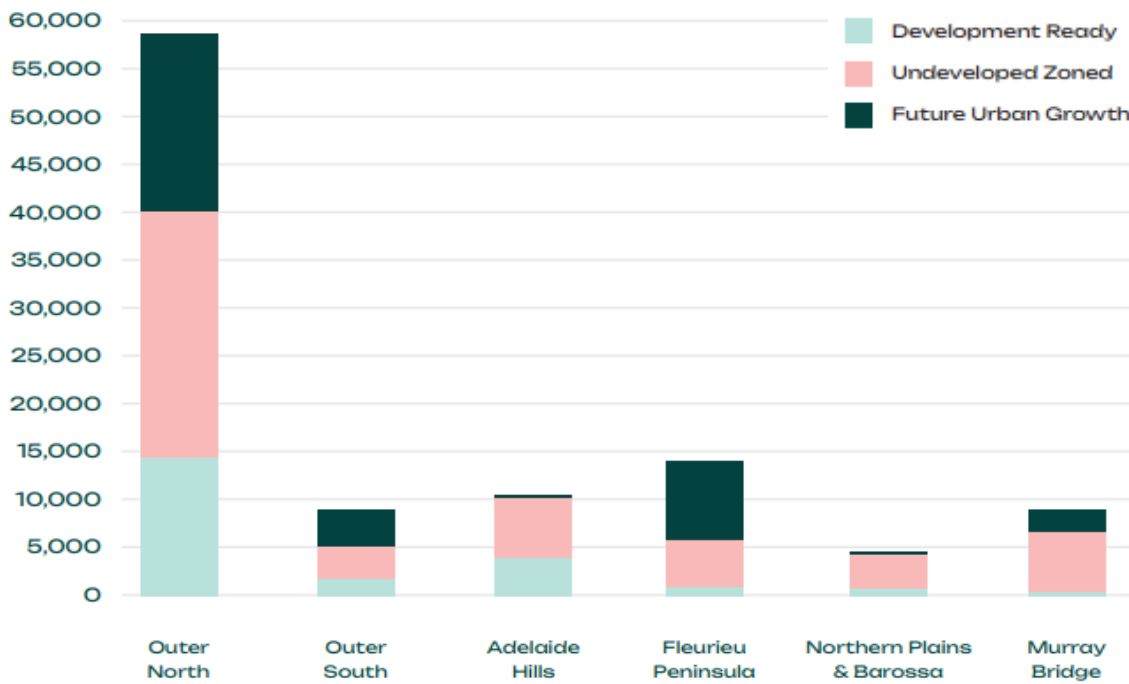


Figure 3.1: Projected Future Land Supply

(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023, page 108)

The Planning Development and Infrastructure Act 2016 (PDI Act) requires a statutory review of the EFPA every five years and that variations can only be made if a 15-year supply of urban land cannot be identified outside those areas. The Discussion Paper identifies that the Commission will review growth opportunities within the EFPA as part of identifying long term growth to ensure an ongoing 15 year supply of zoned urban land. The review will include a review of the agricultural or environmental significance of the land.

4. SUITABILITY OF THE SUBJECT LAND FOR URBAN DEVELOPMENT

4.1. Viability of Land for Primary Production

Given the location of the land within the EFPA and within the 'Virginia Horticultural District' where the current policies seek no further fragmentation or loss of areas currently zoned for primary production, advice has been received from Daniel Hoffman, Horticultural Specialist, on the primary production value of the land (included as **Appendix 1**).

Notably, four of the six allotments are not currently being used for any form of food production. We understand that the majority of the allotments have not been actively used for commercial food production for at least 10 years with two properties (one with vines and one with glasshouses) having stopped use at least 10 years ago.

Daniel Hoffman has advised:

- The subject land soil type is loamy on heavy red clay with a very low topsoil content as a result of 54 years of heavy cropping and machine working. Given the individual land parcels are only four hectares in area, this land size is not large enough to have allowed periods of time between planting of new crops to maintain the ongoing health of the land which has resulted in heavy cropping over the years without rest.
- The land is very hard and clumpy at this point, with the land owners stating "a large amount of heavy Herbicide/Pesticide use making the land unsuitable or very hard to work with via soil grown crops" As a result, continued horticultural use is occurring through adding grow tables, so crops do not need to touch the land and be grown in the existing soils. Land also has very poor drainage as its shallow topsoil and hard clay/calcium carbonate layer traps the water in my opinion. With such poor drainage, crops grown suffer significant losses from root rot and fungal diseases as the rootzone never dries and has very poor oxygen content and provides excellent conditions for pathogens and bacteria to outnumber beneficial microbes and beneficial fungi.
- Most other parts of Virginia and surrounding horticultural areas are a more even softer loamy clay, not such a hard red clay with small amounts of loam. Most of Virginia is protected cropping via greenhouse/glasshouse so topsoil has been left intact and has far less toxins that have been used compared to this old open field type of cropping that has been used on this subject land in Penfield Gardens;
- The soil condition of the subject land is important for quick cost-effective agricultural production as this will allow land holders to produce food fast and as cheaply as possible with no infrastructure requirements;
- Soil tests have been undertaken that show the land is high in heavy metal toxicity (but not above accepted levels) and is lower in nutrients than surrounding areas. Nutrients would need to be added to land to build up quality over time if to be used for food production.
- Although soilless food production is possible, it comes at a heavy cost of infrastructure and council/government approvals with long building processes, greenhouses can cost anywhere from \$45 per m² for the lowest tech

greenhouses which will still need to be in soil production right up to \$300 per m² which moves into hydroponics and soilless production. Hydroponic production also requires heavy inputs of fertilisers, chemicals and labour to optimise production which takes profit margins down significantly with today's current fertiliser and chemical prices;

- Hydroponics can be set up anywhere, at a cost, so this land is not critical for food production;
- The subject land has access to bore water, however this source is high in salt levels with an extremely high iron content which is not suitable for ongoing food production. Landowners have been relying on Reverse Osmosis systems to remove salts from water which comes with another costs to production;
- Access to water from the Bolivar Recycled Pipeline and Northern Adelaide Irrigation Scheme (NAIS) would require enough landowners to connect and to take enough water allocation to make it financially viable for a new water line to be run. In addition, sufficient water storage would need to be built on each property to store allocated water as the line will not have enough pressure to irrigate straight from the metre (with a dam or large tanks to be in place at the property owners cost prior to allocation);
- If the land is to be used for field production (broadacre) then four hectares is not sufficient or financially viable as a viable farmed area for food production. Four hectares is more like a hobby farm;
- As land parcels are four hectares in size, there is no opportunity to rest the land to enable continued viable use;
- Most broadacre farms start at 80 acres (32 hectares), at a minimum. Larger land parcels for soil grown broadacre crops is crucial for resting plots and scattered planting to create a constant income. Four Hectares allows room for one crop type only which means one income and then the farmer will have to wait to prep and plant again creating big gaps in income;
- Four hectares is sufficient to farm for intense greenhouse production/Hydroponics production but will need heavy investment in the land and infrastructure to build suitable structures. There is far cheaper land further north with good water to set up hydroponics as an alternative option within the same vicinity;
- The location of the land and its proximity to primary production markets is not an important factor alone in determining the value of the land for food production use. Produce can be picked up and trucked around from any location that has reasonable access to road infrastructure; and
- As subdivision and land development in the area continue, this will continue to increase the constraints and limitations on the use of the land. Limitations are already being experienced by the landowners in relation to use of adjacent roads for the necessary movement of large heavy tractors and vehicles associated with farming use, use of pesticides and fertilising of the land and the need to burn off crops.

In summary, the advice provided is that for land parcels to be able to be used for horticulture and sustain a viable business, much investment will be needed. Access to a reasonably priced and quality of water supply, the soil condition, infrastructure set up costs for greenhouse production and the growing operational compliance constraints from adjoining residential development are identified as key factors why the land is not currently be used for food production. Accordingly, in Daniel's opinion, the land is not critical to be retained for food production and given the land has not been used for some time could not be held to be critical to the overall supply of land within Greater Adelaide to support food supply.

Based on this advice, it is our opinion that the land is not, and has not been for many years, contributing to the intent of the Virginia Horticulture Precinct and the removal of the land from the EFPA would not be contrary to its stated purpose as set out in Section 7 of the PDI Act to 'ensure that areas of rural, landscape, environmental or food production significance within Greater Adelaide are protected from urban encroachment.'

4.2. Interfaces with Primary Production

Based on the information provided by landowners on the operational constraints for primary production in this location as a result of adjacent residential development, we note that if this land were to be used for residential purposes it is relevant to consider ensuring that this does not shift the problem further south creating the same issues on nearby land within the 'Rural Horticultural Zone'. On this basis, we note that the land holding is of sufficient size to enable future development to be arranged and sited to provide a buffer (if/where required), to adjacent primary production activities.

These matters would be considered in detail, and any necessary investigations undertaken, at the point of a Code Amendment which would be required to consider State Planning Policy 8.4: 'Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.'

4.3. Locational Attributes

The subject land is located between the Adelaide CBD and Gawler, approximately 35-40 minutes' drive north of the Adelaide CBD (approx. 40kms) and 15 minutes' drive (approx. 18kms) along the Northern Expressway from Gawler. The land is also 15-20 minutes' drive from the employment and industrial precinct around the Wingfield area providing convenient access to employment.

The use of the land for future residential purposes is consistent with the clear desired outlined in the Discussion Paper to concentrate growth in areas that can capitalise on previous, or planned investments in major physical and social infrastructure such as roads, schools, healthcare, water and public transport services.

The Discussion Paper identifies a number of challenges to consider in respect to potential future residential/ employment growth along the 'north-eastern spine'. The subject land is well positioned to address these challenges for the following reasons:

Challenge (identified in the Discussion Paper, p121)	Response (Land Suitability)
<p>Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed</p> <p>Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance.</p>	<ul style="list-style-type: none"> The subject land is not currently optimally used for agricultural and food production purposes and based on the horticultural advice received, it is unlikely that the land holdings will be viable for food production purposes in the future. On preliminary review, there does not appear any other significant landscape or environmental features associated with the land that would prevent use for urban purposes;
<p>It will be important to ensure that there is an interurban break between development at the northern end of the City of Playford and the southern extent of the town of Gawler</p>	<p>The subject land is located to the north-west of Gawler so would not result in a loss of the suggested inter-urban break.</p>
<p>It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency.</p>	<p>Future development of the site for residential purposes would not take away any employment source in the area, given the subject land is not being fully used for food production purposes. The likely additional population created through development for residential purposes would create new additional local employment opportunities to support the local community.</p>
<p>The opportunity to further extend urban development at Roseworthy will need to be balanced with an assessment of the contribution this land makes to the state's economy from cereal cropping</p>	<p>Not relevant to this land.</p>

4.4. Subject Land Potential (Capacity)

Assuming a conservative yield of 10 dwellings per hectare (gross) and a land area of 24 hectares, the subject land could yield in the order of 240 dwellings.

This would amount to an additional 1.26% of supply to the 19,000 projected supply in the Outer North Area of Greater Adelaide.

Based on a limited 'desktop' assessment of the site (and setting aside the current EFPA boundary), we are of the opinion that the site would have limited constraints that would prevent future development achieving this dwelling yield given:

- Topography – the land is flat with no discernible gradient;
- Native Vegetation – the site has been cleared of vegetation. Notwithstanding, there is some remaining patches of mature vegetation around the periphery of the subject land, that could be retained and incorporated into the future development of the site.
- Flooding – the Hazards (Flooding – General) Overlay applies over parts of the subject land, in a similar manner to nearby land parcels within Angle Vale that are being developed for residential purposes. It is anticipated that the requirements of this Overlay could be addressed by the provision of suitable infrastructure to manage stormwater conveyance and flooding (e.g. stormwater detention areas etc.)
- Heritage – there are no State or local heritage places on the subject land.
- Gas & Liquid Petroleum Pipeline – a high pressure gas pipeline is located along the eastern side of Heaslip Road adjacent to the subject land. The 'Gas & Liquid Petroleum Overlay' extends to approximately 90 metres into the site along the Heaslip Road frontage. On this basis, future applications (including land division to create allotments under one hectare for urban purposes) would be referred to the Chief Executive of the Department of Mines and Energy (responsible for administering the Petroleum and Geothermal Energy Act 2000). Based on the precedent of low density housing being constructed within this Overlay within the immediate locality (over Curtis Road), the presence of the pipeline is not likely to materially constrain the opportunity for future development of the subject land.

4.5. Social and Community Infrastructure

The site is well located within proximity to a variety of complementary services and facilities associated with the growing area of Angle Vale including:

- The new Riverbanks College (Birth to Year 12) as well as other primary & secondary schools;
- Existing Child care centres (Approximately 5 within the locality);
- Shopping facilities including a new Activity Centre at Tudor Vale approximately 2km to the west, fronting Curtis Road;
- Sporting facilities; and
- Medical and aged care facilities.

Through a rezoning process, additional investigations would be undertaken to consider and identify any additional social and community infrastructure needs (if/where required).

4.6. Services Infrastructure

Given the subject land's location adjacent to master planned residential communities that are well progressed, the site is likely to have adequate infrastructure capacity and/or augmentation capability.

The proximity of the subject land aligns with the Commission's desired to focus new development where established infrastructure exists and where investment in new or upgraded infrastructure is proposed (p92 of Discussion Paper) .

4.7. Transport & Connectivity

The subject land is located adjacent to the southern extent of the planned Angle Vale township (as defined by the current 'Master Planned Township Zone' in the Planning and Design Code).

Performance Outcome 14.1 of the 'Master Planned Township Zone' seeks development that is compatible with the outcomes sought by any relevant Concept Plan contained within Part 12 – Concept Plans of the Planning and Design Code to support the orderly development of land through staging of development, provision of infrastructure and the location of new activity centres. Part 12 of the Code includes 'Concept Plan 16 – Angle Vale Infrastructure and Concept 17 – Angle Vale (see **Figure 4.1** below) that applies and sets out a series of road and freight networks as well as 'greenway' enhancements.

The subject land is well located to connect directly to Curtis Road and Heaslip Road.

Assuming a daily vehicle trip rate of 10 movements per dwelling, this would equate to an additional 2,400 movements per day (assuming potential for 240 new dwellings on the subject land) which when split across both Curtis and Heaslip Road would likely be a relatively moderate and modest increase in the total number of movements per day on each road.

We note that an Angle Vale Road Infrastructure Deed valued at over \$54 million is in place and is being used to fund upgrades to Angle Vale Road, Heaslip Road, Frisby Road, Curtis Road along with other smaller roads. We understand that this will include a new intersection treatment on the corner of Curtis Road and Heaslip Road which is directly adjacent the site and would directly support and service traffic generated by the possible future development of the subject land.

There would also be opportunity to contribute to any required minor infrastructure upgrades (such as widening of roads along the site frontages or nearby intersections) as part of a future approval process (via a Code Amendment and/or future Development Application).

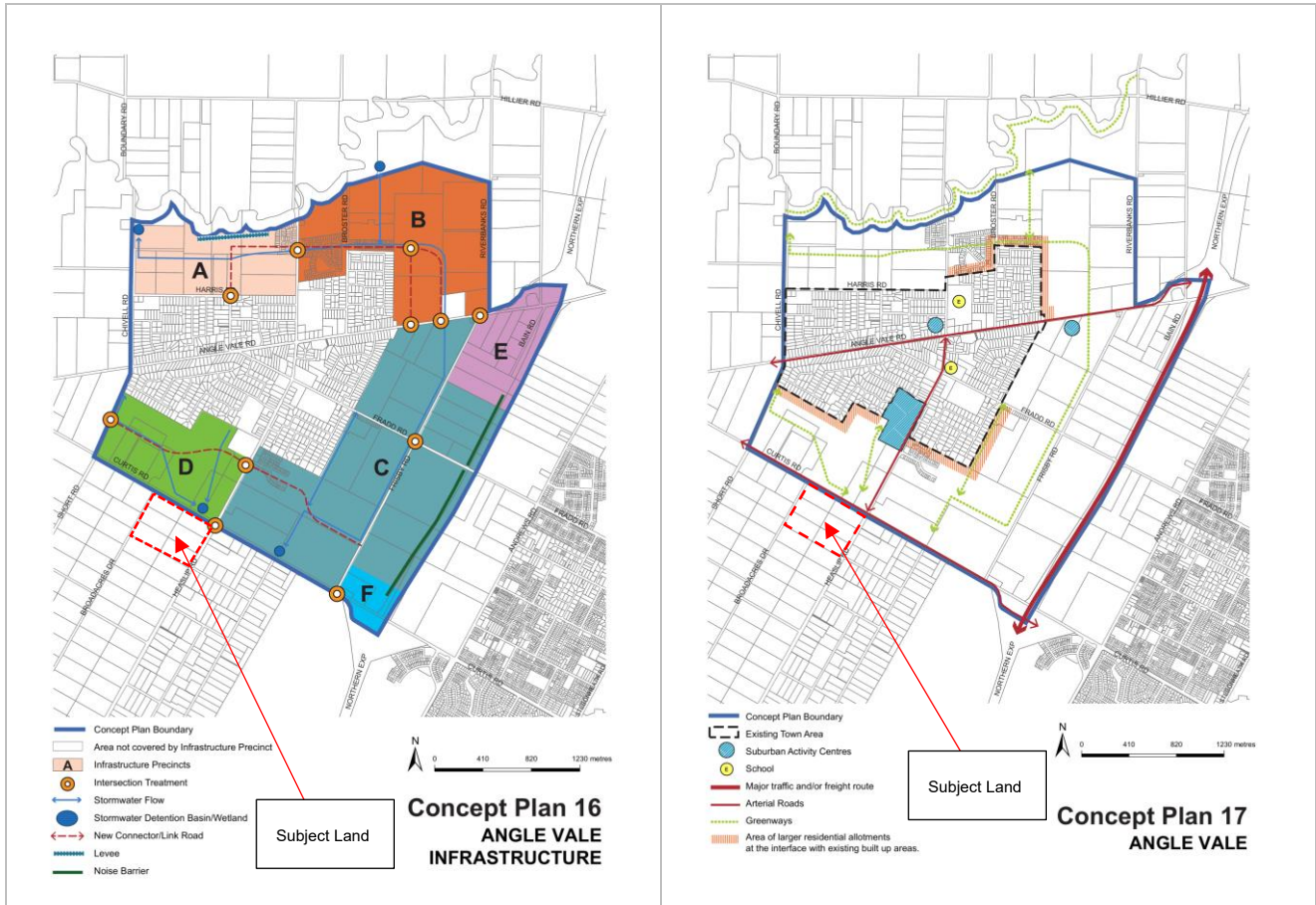


Figure 4.1 – Concept Plans – Angle Vale (Source: Planning and Design Code)

5. CONCLUSION

This submission is provided to assist the State Planning Commission’s upcoming review of the Regional Plan for Greater Adelaide.

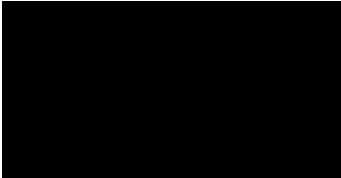
The subject land is not currently optimally used for agricultural and food production purposes and based on the horticultural advice received, it is unlikely that the land holdings will be viable for food production purposes in the future. This is due to a number of constraints that will likely mean that the land won’t be viable given its existing condition (including poor soil profile and structure), limited access to viable sources of water, proximity to adjacent residential uses (creating operational constraints) and the modest size of individual land parcels that limit their suitability for primary production purposes and limited opportunity to ‘rest’ the land and apply economic crop rotation practices.

The landowners therefore request that the subject site is considered for identification as a ‘future urban growth’ area in the next iteration of the Greater Adelaide Regional Plan (GARP), and in the next review of the ‘Environment Food & Production Area’.



Please do not hesitate to contact the undersigned on [REDACTED] if you would like to discuss any aspect of the above advice further.

Yours Sincerely,



Rick Hutchins

Associate

CC: Anthony Merenda [REDACTED]
George Tipouikidis [REDACTED]
Pina Carbone [REDACTED]
John Kiparogiou [REDACTED] ens



APPENDIX 1

Horticultural Specialist Advice



30th Oct 2023

Anthony Merenda [REDACTED]

George Tipouikidis [REDACTED]

Pina Carbone [REDACTED]

John Kiparoglou [REDACTED]

Dear all,

RE: PRIMARY PRODUCTION VALUE OF LAND IN PENFIELD GARDENS

I thank you for your instructions to assist with providing critical research on the primary production value of your land holdings (as identified above) to assist you with consideration of future land use options with your land.

I have worked in or around horticultural/farming on the Adelaide plains for over 20 years and have a detailed understanding of the local area and the associated constraints and opportunities to use land within the area for farming.

In addition to operating my own farm within the local area for 15 years, I have held roles advising and training growers on how to best utilize their farms and soils better. I particularly specialise in disease and pest control in soils, water and plants working closely with government agencies.

You have sought my advice on the following specific questions:

Question 1: What is the soil profile and current condition of the land, and is it suitable for agricultural use?

The subject land soil type is loamy on heavy red clay with a very low topsoil content as a result of 54 years of heavy cropping and machine working. Given the land parcels are only 4 Hectares in area, this land size is not big enough to have allowed resting options to maintain the ongoing health of the land which has resulted in heavy cropping over the years without rest.

The land is very hard and clumpy at this point as illustrated in the images below, with the land owners stating “a large amount of heavy Herbicide/Pesticide use making the land unsuitable or very hard to work with via soil grown crops” As a result, continued horticultural use is occurring through adding grow tables, so crops do not need to touch the land and be grown in the existing soils. Land also has very poor drainage as its shallow topsoil and hard clay/calcium carbonate layer traps the water in my opinion. With such poor drainage, crops grown suffer significant losses from root rot and fungal diseases as the rootzone never dries and has very poor oxygen content and provides excellent conditions for pathogens and bacteria to outnumber beneficial microbes and beneficial fungi.

PRIMARY PRODUCTION VALUE OF LAND IN PENFIELD GARDENS



A close up of the type of soil at the subject land, note the heavy salinity in the left and the clumpy hardness on the right after land working.

Question 2: What is the soil profile and condition of the subject land in comparison to other parts of the 'Virginia Horticulture District'?

In my opinion, through my experience and knowledge having worked in the Virginia area for more than 20 years, most other parts of Virginia and surrounding horticultural areas are a more even softer loamy clay, not such a hard red clay with small amounts of loam. Most of Virginia is protected cropping via greenhouse/glasshouse so topsoil has been left intact and has far less toxins that have been used compared to this old open field type of cropping that has been used on this subject land in Penfield Gardens.

Also, in my experience most soil reports from the wider Virginia area come back between 6.5 and 8Ph (Ph meaning the measure of the acidity or alkalinity of soils, growing media and water) This is an acceptable Ph with the use of acids or acidic inputs to bring the Ph down to a perfect plant acceptable range of 5.7 to 6.5 Ph.

The wider surrounding areas have an Ec (Electrical conductivity, the measure of the total amount of salts including fertiliser salts in the growing media/soil) of 20-30 cmol/kg (centimoles per kilogram used to report the cation exchange capacity CEC of the soil and the amounts of exchangeable cations that can occupy like potassium, calcium, magnesium etc) which is acceptable.

Most surrounding soils are high in Phosphorous which is very important for plant growth although not always available for plant uptake (locked out) and will have acceptable Ca – Mg – K (calcium to Magnesium to potassium) ratios.

Most surrounding crop soils will have a varying level of sodium Na depending on the water types being used for irrigation, this Na is almost always easily leached away when using good calcium and water as these lands have far better drainage and a deeper level of calcium carbonate not trapping water in.

PRIMARY PRODUCTION VALUE OF LAND IN PENFIELD GARDENS

Please see the attached soil report for Heavy metal toxicity for the subject land (Appendix 2), tests were carried out on the Merenda property. Tests show safe results for all heavy metals, although on the higher side it is still deemed “acceptable”. **Soil nutrient** tests (Appendix 1) were also carried out on the same land showing reasonable nutrient levels when compared to the wider Virginia areas soil test results which is also attached for reference (Appendix 3)

Subject land is lower in nutrients than surrounding areas, Nitrogen is very low and organic carbon is very low, most likely in my opinion this is because the subject land has not been used for production for a long time. The subject land can be brought back up to scratch for Horticulture production but will require fertiliser inputs more regularly to make up for the low levels in the soil now, heavy compost and organic matter would also have to be spread out on a regular basis to slowly build up the organic matter and carbon levels in the land, this will take a number of years to build up.

Appendix 1 – Merenda land soil nutrient report

Appendix 2 – Merenda land soil heavy metals toxicity report

Appendix 3 – Example soil reports from the wider Virginia area for reference and comparison

Question 3: How important is the soil condition of the subject land for agricultural use, given options that are available for food production without needing direct access to soil?

The soil condition of the subject land is important for quick cost-effective agricultural production as this will allow land holders to produce food fast and as cheaply as possible with no infrastructure requirements. Although soilless food production is possible, it comes at a heavy cost of infrastructure and council/government approvals with long building processes, greenhouses can cost anywhere from \$45 per m² for the lowest tech greenhouses which will still need to be in soil production right up to \$300 per m² which moves into Hydroponics and soilless production. Hydroponic production also requires heavy inputs of fertilisers, chemicals and labour to optimise production which takes profit margins down significantly with today's current fertiliser and chemical prices.

In my opinion, Hydroponics can be set up anywhere at a cost so this land is not critical for food production.



Example of low tech soil greenhouse in Virginia



Example of low-tech soil grown greenhouse...note the softer soil



Example of high-tech hydroponic soilless greenhouse which can be set up anywhere.

Question 4: Does the subject land have good access to water to support food production activities given its proximity to the recycled main water (purple pipe) that runs along the western alignment of Broadacres Drive? Is the use of this water source a viable option for the subject land?

PRIMARY PRODUCTION VALUE OF LAND IN PENFIELD GARDENS

Some of the subject land parcels have access to bore water, although in the landowner's opinion this bore is old and very salty with an extremely high iron content which has turned crops red when using sprinkler irrigation. (I have not run water tests to confirm this as part of this scope of work)

One parcel of the subject land (CT5214/223 Kiparoglou) has access to the Boliva recycled water irrigation line.

The Land holders have been relying on RO systems (reverse osmosis) to remove salts from the water (remove the High Ec of the water which is between 1.8Ec and 2.2Ec at times in my experience) before applying to crops which comes with another large cost to production. RO units do get fouled up quickly, so the RO units require frequent maintenance and membrane changes costing upwards of \$1000 per membrane x 8 membranes per unit every 6months or sometimes sooner, again this is in my experience when working with farms and bores in the Virginia area.

The bolivar recycled pipeline is in close proximity to the land parcels but in the past connections have been denied due to insufficient flow, pressure and not enough interest in connecting as SA Water require enough landowners to connect and take enough water allocation to make it financially viable for a line to be run. After meeting with SA Water regarding the bolivar line and the Northern Adelaide Irrigation Scheme (NAIS) I have been provided with the following information regarding connection.

- The three properties along Broadacres Road can possibly connect to the NAIS as the main line runs along that road (one parcel already connected as stated above)
- The three properties that run along Heaslip Road would only be able to connect after an investigation into whether more properties along that road would join the connection so as to make running a new main pipe down that road viable for SA Water
- A minimum water allocation of 10ML (10,000 kL) per property must be taken
- Sufficient water storage must be built on each property to store allocated water as the line will not have enough pressure to irrigate straight from the meter (large dam or large tanks must be completed at the property owners cost prior to allocation)

Below is an example of the cost to connect. In my opinion this is viable for food production although it is higher than what the surrounding areas are paying for the current Virginia pipeline water (usually 18c per kL) and it is at a higher cost than using the existing bore, also RO units will still be necessary if growers want the best crop results as Boliver water runs between 1.8Ec and 2.4Ec at certain times of the year which is too high for some crops.

NAIS Water Cost Structure 2023/24

1. \$3.55/kL - Once Off Capital Contribution
2. \$0.289/kL Annual Availability Charge per kilolitre of Contracted Volume
3. \$0.30/kL Usage per kilolitre used

The once off Capital Contribution can be paid off over 15 years. To meet this criteria, a 20% deposit must be paid on contract execution. There is then a \$0.256/kL charge per kL of Contract Volume for 15 years.

EXAMPLE:

PRIMARY PRODUCTION VALUE OF LAND IN PENFIELD GARDENS

A 20 ML contract attracts the following charges.

1. Capital Contribution

Total cost is $20,000 \text{ kL} * \$3.55 = \$71,000$. The 20 % deposit is \$14,200. The balance is paid over

15 years at $\$0.256/\text{kL} * \text{Contract Volume} = \sim \$5,120$ per year.

2. Annual Availability

The total cost is $20,000 \text{ kL} * \$0.289/\text{kL} = \$5,780$ per year.

3. Usage per Kilolitre

The total Cost (assuming 100% use) = $20,000 \text{ kL} * \$0.30/\text{kL} = \$6,000$

TOTAL COSTS SUMMARY:

Capital Contribution = \$5,120 / yr for first 15 years

Annual Availability = \$5,780/yr

Usage = \$6,000/yr assuming 20,000 kL use

TOTAL = \$16,900 per year plus once off \$14,200 capital contribution.

NOTES:

- CPI is applied each year.
- Some customers elect to pay the capital contribution 100% in full.
- Capital contribution is only charged for first 15 years.

Question 5: Is the size of each land parcel (around 4 hectares) viable to support food production?

If the land is to be used for field production (broadacre) then Four Hectares is not sufficient or financially viable as a viable farmed area for food production, it's more like a hobby farm. Most broadacre farms start at 80 acres, at a minimum. Larger land parcels for soil grown broadacre crops is crucial for resting plots and scattered planting to create a constant income., Four Hectares allows room for one crop type only which means one income and then the farmer will have to wait to prep and plant again creating big gaps in income.

However, four Hectares is sufficient to farm on given intense greenhouse production/Hydroponics production but again will need heavy investment in the land and infrastructure to build suitable structures. There is far cheaper land further North with good water to set up Hydroponics as an alternative option within the same vicinity.

Question 6: How important is the location of the subject land and its proximity to primary production markets for food production use?

In my opinion, the location of the land and its proximity to primary production markets is not an important factor alone in determining the value of the land for food production use. Produce can be picked up and trucked around from any location that has reasonable access to road infrastructure. The subject land has good access to road infrastructure given proximity to the Northern Expressway.

PRIMARY PRODUCTION VALUE OF LAND IN PENFIELD GARDENS

An example is Sundrop farms located near Port Augusta nearly 4 hours away from the Adelaide produce markets, where they produce huge amounts of tomatoes and other produce that goes directly to the supermarket giants and also to the Adelaide produce markets, Sundrop have invested heavily into this area building a large Hydroponic facility with a huge reverse osmosis plant which takes sea water and converts it to fresh water for use in food production.

Most produce sales are done from farm sheds or merchant sheds bypassing the markets almost completely and all merchants will pick up stock from anywhere it is produced.

Growers can simply grow and produce what vegetable/fruit lines they like and find a merchant to come straight to farm and pick up all produce, This is a regular way to conduct sales directly on farm, growers also have the option to set up accounts with transport companies who will pick up produce from anywhere in the country and ship it to any market in the country the grower wishes to sell in.

Question 7: How has the subdivision and development of adjacent land for residential use impacted on the ability to use and operate the subject land for horticultural purposes

As subdivisions and land development in the area continue, this will continue increase the constraints and limitations on the use of the land for food production. As new estates and housing has already commenced surrounding these parcels of land, the continued use of the land for farming and cropping will impact the new residents. For example, a necessary activity associated with the use of land for primary production is the need to apply composts (often strong smelling) and manures and the constant application of pesticides will impact the quality of air and the smell on the air.

Field/broadacre crops require a lot of land work and cultivation which fills the area with dust and noise pollution, need frequent composts and manures applied in the open contributing to air pollution for surrounding residents. It also requires a lot of broad-spectrum pesticides applied to the open fields running the risks of spray drifts and contamination of neighbouring sites and residents in such small four-hectare allotments.

Greenhouse production in the soil also carries similar restraints as field production. Whilst greenhouse hydroponic/soilless production has no groundwork, it still has heavy pesticide use but will be restricted to indoors so not as significant of a problem as broadacre field production.

The need to burn off crops and rubbish frequently will also contribute to poor air quality for surrounding residents, with the only other alternative to burning being the rubbish removal at the cost of landowners via trucks, skips etc. Permits to use burn offs will be restricted once housing approaches as growers need to apply to Council for any burn off permits. Council and CFS then come to the property to inspect burn off piles before allowing permits and take into consideration the distance between properties to residential areas already close by the subject land parcels. Growers will then have to wait for perfect wind conditions to commence burning so as not to interfere with surrounding residents which almost means they will have to wait for zero wind factor, so the smoke only travels straight up which delays production greatly. If the wind direction changes during burn off, residents contact CFS, who will come out and issue fines accordingly to landowners.

The necessary movement of large heavy tractors and vehicles associated with primary production use of the subject land has already been impacted by road closures and limited space. Before the subdivision of land nearby to the subject land and the development of this land for new housing started approaching, the movement of heavy wide vehicles was easy using adjacent streets. Now this comes at a high risk of vehicle accidents as residential traffic has increased significantly. I am advised

PRIMARY PRODUCTION VALUE OF LAND IN PENFIELD GARDENS

by the landowners that several accidents and near misses have already occurred. All of this has already impacted and restricted landowners of the subject properties costing them production, increasing farm costs and creating huge time delays making it very difficult to remain profitable in an already cluttered market of over production of food and vegetables.

Summary

For the land parcels to be used for Horticulture and sustain a viable business, much investment will be needed from landowners.

Soil structure will need to be improved by adding composts, organic carbon and nutrients back in over a number of years, this can't be done short term as the soil will need to be brought back to 'life' by feeding microbes and soil biology.

Building up infrastructure such as greenhouses and dams as the land is not big enough for broad acre farming.

Access to better quality water will also be needed as well as installing water storage tanks and dams again.

In summary to all the above information and my experience, it is my opinion that the subject land in Penfield Gardens can still be used for horticulture food production but is definitely not necessarily critical to food production.

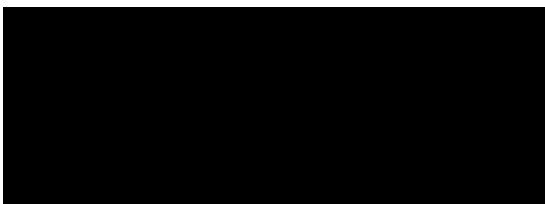
Whilst the subject land can still be used for Horticulture it is for the most part not utilised for this and has not been used for Horticulture for some time so again it is not critical to food production and will not be missed in the scheme of food production for the wider area.

These subject parcels of land have not been used for production in quite a lot of years, apart from the Merenda property which is being used for small lettuce production out of soil.

I hope this information serves you all well and I wish you all the best, thank you.

Daniel Hoffmann

Horticultural Consultant / Specialist



SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
Agent Address: 48 Hawker Road,
BURTON, SA, 5110
Client: Merenda
Test Set or Quotation: H1
Barcode: 111085809
Batch Number: 34798
Submission ID: 112160

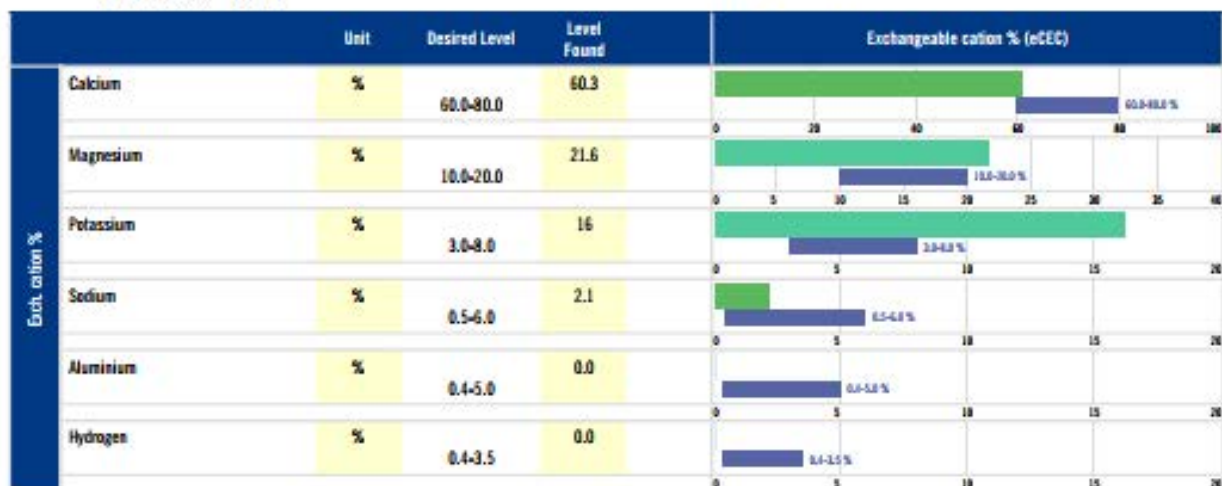
Report Date: 26/09/2023
Sampling Date: 15/09/2023
Date Received: 18/09/2023
Sample Name: Left Side Table
Crop: Horticulture
Sample Depth: 0-30
GPS Start: NA
GPS End: NA

	Analyte	Unit	Desired Level	Level Found	c.mol/kg	Very Low	Low	Acceptable	High	Excessive
Extractable P-K-S	MIR - Aus Soil Texture			Loam						
	ECEC	cmol/kg	5.00-25.0	15.4						
	Organic Carbon (W&B) ²	% (40°C)	1.50-2.75	0.80						
	pH 1:5 water	pH units	6.50-8.00	7.82						
	pH CaCl2 (following 4A1)	pH units	5.50-7.00	7.10						
	Nitrate - N (2M KCl)	mg/kg	30-50	6.3						
	Ammonium - N (2M KCl)	mg/kg	2.0-10	<1.0						
	Colwell Phosphorus	mg/kg	100-170	160						
	PBI - Col P		35-70	89						
	MCP Sulfur (S)	mg/kg	10-40	8.5						
Exchangeable cations	Calcium (Ca) - AmmAc	mg/kg	1200-2200	1870	9.31					
	Magnesium (Mg) - AmmAc	mg/kg	175-300	405	3.33					
	Potassium (K) - AmmAc	mg/kg	250-450	971	2.48					
	Sodium (Na) - AmmAc	mg/kg	15.0-120	75.1	0.327					
	Exchangeable aluminium	cmol/kg	0.20-0.50	<0.02						
	Exchangeable hydrogen	cmol/kg	0.20-0.50	<0.02						
Trace Elements	Boron	mg/kg	1.0-2.5	2.0						
	Iron (Fe)	mg/kg	10-70	16						
	Manganese (Mn)	mg/kg	2.0-20	6.3						
	Copper (Cu)	mg/kg	1.0-4.0	5.8						
	Zinc (Zn)	mg/kg	1.5-6.0	3.7						
Salt	Chloride	mg/kg	15-180	8						
	Salinity EC 1:5	dS/m	0.025-0.20	0.14						
	Ece	dS/m	0.10-1.5	1.3						
Physical	MIR - Clay	%		20.3						
	MIR - Sand (+20 micron)	%		62.7						
	MIR - Silt (2-20 micron)	%		16.9						
Ratios	Ca:Mg Ratio		2.0-8.0	2.8						
	K:Mg Ratio		0.10-0.50	0.75						

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
 Agent Address: 48 Hawker Road,
 BURTON, SA, 5110
 Client: Merenda
 Test Set or
 Quotation: H1
 Barcode: 111085809
 Batch Number: 34798
 Submission ID: 112160

Report Date: 26/09/2023
 Sampling Date: 15/09/2023
 Date Received: 18/09/2023
 Sample Name: Left Side Table
 Crop: Horticulture
 Sample Depth: 0-30
 GPS Start: NA
 GPS End: NA



NOTE¹: Eurofins APAL will review published literature for crop desired levels, and reserves the right to make changes to this information in test reports as and when these reviews are conducted.

NOTE²: Walkley and Black Organic Carbon % (40°C) data presented in this test report have been obtained by a combination of laboratory wet chemistry and the equivalent modelled result from Mid-Infrared Diffuse Reflectance Spectroscopy and Partial Least Squares Regression (PLSR) analysis. An explanatory technical note is available upon request. The exception is for quoted work that specifically required laboratory wet chemistry.

APAL
PO Box 327
Magill
SA 5072



NATA Accredited
Accreditation Number 1261
Site Number 1254

Accredited for compliance with ISO/IEC 17025 – Testing
NATA is a signatory to the ILAC Mutual Recognition
Arrangement for the mutual recognition of the
equivalence of testing, medical testing, calibration,
inspection, proficiency testing scheme providers and
reference materials producers reports and certificates.

Attention: **Cathy Griff**

Report **1026897-S**
Project name **GROWERS SUPPLIES-MERENDA**
Received Date **Sep 18, 2023**

Client Sample ID			111085808- RIGHT SIDE FIELD
Sample Matrix			Soil
Eurofins Sample No.			M23- Se0039379
Date Sampled			Not Provided¹²
Test/Reference	LOR	Unit	
Heavy Metals			
Antimony	10	mg/kg	< 10
Arsenic	2	mg/kg	4.3
Barium	10	mg/kg	85
Beryllium	2	mg/kg	< 2
Boron	10	mg/kg	15
Cadmium	0.4	mg/kg	< 0.4
Chromium	5	mg/kg	47
Cobalt	5	mg/kg	10.0
Copper	5	mg/kg	34
Lead	5	mg/kg	14
Manganese	5	mg/kg	340
Mercury	0.1	mg/kg	< 0.1
Molybdenum	5	mg/kg	< 5
Nickel	5	mg/kg	20
Selenium	2	mg/kg	< 2
Tin	10	mg/kg	< 10
Vanadium	10	mg/kg	57
Zinc	5	mg/kg	34
Sample Properties			
% Moisture	1	%	12

Sample History

Where samples are submitted/analysed over several days, the last date of extraction is reported.

If the date and time of sampling are not provided, the Laboratory will not be responsible for compromised results should testing be performed outside the recommended holding time.

Description	Testing Site	Extracted	Holding Time
Heavy Metals - Method: LTM-MET-3040 Metals in Waters, Soils & Sediments by ICP-MS	Melbourne	Sep 19, 2023	28 Days
Mercury - Method: LTM-MET-3040 Metals in Waters, Soils & Sediments by ICP-MS	Melbourne	Sep 19, 2023	28 Days
% Moisture - Method: LTM-GEN-7080 Moisture	Melbourne	Sep 18, 2023	14 Days

Melbourne	Geelong	Sydney	Canberra	Brisbane	Newcastle
6 Monterey Road Dandenong South VIC 3175 Tel: +61 3 8564 5000 NATA# 1261 Site# 1254	19/8 Lewalan Street Grovedale VIC 3216 Tel: +61 3 8564 5000 NATA# 1261 Site# 25403	179 Magowar Road Girraween NSW 2145 Tel: +61 2 9900 8400 NATA# 1261 Site# 18217	Unit 1,2 Dacre Street Mitchell ACT 2911 Tel: +61 2 6113 8091 NATA# 1261 Site# 25466	1/21 Smallwood Place Murarrie QLD 4172 Tel: +61 7 3902 4600 NATA# 1261 Site# 20794	1/2 Frost Drive Mayfield West NSW 2304 Tel: +61 2 4968 8448 NATA# 1261 Site# 25079 & 25289

Perth
46-48 Banksia Road Welshpool WA 6106 Tel: +61 8 6253 4444 NATA# 2377 Site# 2370

Auckland	Christchurch	Tauranga
35 O'Rourke Road Penrose, Auckland 1061 Tel: +64 9 526 4551 IANZ# 1327	43 Detroit Drive Rolleston, Christchurch 7675 Tel: +64 3 343 5201 IANZ# 1290	1277 Cameron Road, Gate Pa, Tauranga 3112 Tel: +64 9 525 0568 IANZ# 1402

Company Name: Eurofins APAL
Address: PO Box 327
Magill
SA 5072

Order No.:
Report #: 1026897
Phone: 08 8332 0199
Fax: 08 8361 2715

Received: Sep 18, 2023 1:00 PM
Due: Sep 25, 2023
Priority: 5 Day
Contact Name: Cathy Griff

Project Name: GROWERS SUPPLIES-MERENDA

Eurofins Analytical Services Manager : Amy Meunier

Sample Detail						Antimony	Arsenic	Barium	Beryllium	Boron	Cadmium	Chromium	Cobalt	Copper	Lead	Manganese	Mercury	Molybdenum	Nickel	Selenium	Tin	Vanadium	Zinc	Moisture Set
Melbourne Laboratory - NATA # 1261 Site # 1254						X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
External Laboratory																								
No	Sample ID	Sample Date	Sampling Time	Matrix	LAB ID																			
1	111085808-RIGHT SIDE FIELD	Not Provided		Soil	M23-Se0039379	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Test Counts						1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1

Internal Quality Control Review and Glossary

General

1. Laboratory QC results for Method Blanks, Duplicates, Matrix Spikes, and Laboratory Control Samples follows guidelines delineated in the National Environment Protection (Assessment of Site Contamination) Measure 1999, as amended May 2013 and are included in this QC report where applicable. Additional QC data may be available on request.
2. All soil/sediment/solid results are reported on a dry basis, unless otherwise stated.
3. All biota/food results are reported on a wet weight basis on the edible portion, unless otherwise stated.
4. Actual LORs are matrix dependant. Quoted LORs may be raised where sample extracts are diluted due to interferences.
5. Results are uncorrected for matrix spikes or surrogate recoveries except for PFAS compounds.
6. SVOC analysis on waters are performed on homogenised, unfiltered samples, unless noted otherwise.
7. Samples were analysed on an 'as received' basis.
8. Information identified on this report with blue colour, indicates data provided by customer that may have an impact on the results.
9. This report replaces any interim results previously issued.

Holding Times

Please refer to 'Sample Preservation and Container Guide' for holding times (QS3001).

For samples received on the last day of holding time, notification of testing requirements should have been received at least 6 hours prior to sample receipt deadlines as stated on the SRA.

If the Laboratory did not receive the information in the required timeframe, and regardless of any other integrity issues, suitably qualified results may still be reported.

Holding times apply from the date of sampling, therefore compliance to these may be outside the laboratory's control.

For VOCs containing vinyl chloride, styrene and 2-chloroethyl vinyl ether the holding time is 7 days however for all other VOCs such as BTEX or C6-10 TRH then the holding time is 14 days.

Units

mg/kg: milligrams per kilogram	mg/L: milligrams per litre	µg/L: micrograms per litre
ppm: parts per million	ppb: parts per billion	%: Percentage
org/100 mL: Organisms per 100 millilitres	NTU: Nephelometric Turbidity Units	MPN/100 mL: Most Probable Number of organisms per 100 millilitres
CFU: Colony forming unit		

Terms

APHA	American Public Health Association
COC	Chain of Custody
CP	Client Parent - QC was performed on samples pertaining to this report
CRM	Certified Reference Material (ISO17034) - reported as percent recovery.
Dry	Where a moisture has been determined on a solid sample the result is expressed on a dry basis.
Duplicate	A second piece of analysis from the same sample and reported in the same units as the result to show comparison.
LOR	Limit of Reporting.
LCS	Laboratory Control Sample - reported as percent recovery.
Method Blank	In the case of solid samples these are performed on laboratory certified clean sands and in the case of water samples these are performed on de-ionised water.
NCP	Non-Client Parent - QC performed on samples not pertaining to this report, QC is representative of the sequence or batch that client samples were analysed within.
RPD	Relative Percent Difference between two Duplicate pieces of analysis.
SPIKE	Addition of the analyte to the sample and reported as percentage recovery.
SRA	Sample Receipt Advice
Surr - Surrogate	The addition of a like compound to the analyte target and reported as percentage recovery.
TBTO	Tributyltin oxide (<i>bis</i> -tributyltin oxide) - individual tributyltin compounds cannot be identified separately in the environment however free tributyltin was measured and its values were converted stoichiometrically into tributyltin oxide for comparison with regulatory limits.
TCLP	Toxicity Characteristic Leaching Procedure
TEQ	Toxic Equivalency Quotient or Total Equivalence
QSM	US Department of Defense Quality Systems Manual Version 5.4
US EPA	United States Environmental Protection Agency
WA DWER	Sum of PFBA, PFPeA, PFHxA, PFHpA, PFOA, PFBS, PFHxS, PFOS, 6:2 FTSA, 8:2 FTSA

QC - Acceptance Criteria

The acceptance criteria should be used as a guide only and may be different when site specific Sampling Analysis and Quality Plan (SAQP) have been implemented

RPD Duplicates: Global RPD Duplicates Acceptance Criteria is 30% however the following acceptance guidelines are equally applicable:

Results <10 times the LOR: No Limit

Results between 10-20 times the LOR: RPD must lie between 0-50%

Results >20 times the LOR: RPD must lie between 0-30%

NOTE: pH duplicates are reported as a range not as RPD

Surrogate Recoveries: Recoveries must lie between 20-130% for Speciated Phenols & 50-150% for PFAS. SVOCs recoveries 20 – 150%

PFAS field samples that contain surrogate recoveries in excess of the QC limit designated in QSM 5.4 where no positive PFAS results have been reported have been reviewed and no data was affected.

QC Data General Comments

1. Where a result is reported as a less than (<), higher than the nominated LOR, this is due to either matrix interference, extract dilution required due to interferences or contaminant levels within the sample, high moisture content or insufficient sample provided.
2. Duplicate data shown within this report that states the word "BATCH" is a Batch Duplicate from outside of your sample batch, but within the laboratory sample batch at a 1:10 ratio. The Parent and Duplicate data shown is not data from your samples.
3. pH and Free Chlorine analysed in the laboratory - Analysis on this test must begin within 30 minutes of sampling. Therefore, laboratory analysis is unlikely to be completed within holding time. Analysis will begin as soon as possible after sample receipt.
4. Recovery Data (Spikes & Surrogates) - where chromatographic interference does not allow the determination of recovery the term "INT" appears against that analyte.
5. For Matrix Spikes and LCS results a dash "-" in the report means that the specific analyte was not added to the QC sample.
6. Duplicate RPDs are calculated from raw analytical data thus it is possible to have two sets of data.

Quality Control Results

Test			Units	Result 1			Acceptance Limits	Pass Limits	Qualifying Code
Method Blank									
Heavy Metals									
Antimony			mg/kg	< 10			10	Pass	
Arsenic			mg/kg	< 2			2	Pass	
Barium			mg/kg	< 10			10	Pass	
Beryllium			mg/kg	< 2			2	Pass	
Boron			mg/kg	< 10			10	Pass	
Cadmium			mg/kg	< 0.4			0.4	Pass	
Chromium			mg/kg	< 5			5	Pass	
Cobalt			mg/kg	< 5			5	Pass	
Copper			mg/kg	< 5			5	Pass	
Lead			mg/kg	< 5			5	Pass	
Manganese			mg/kg	< 5			5	Pass	
Mercury			mg/kg	< 0.1			0.1	Pass	
Molybdenum			mg/kg	< 5			5	Pass	
Nickel			mg/kg	< 5			5	Pass	
Selenium			mg/kg	< 2			2	Pass	
Tin			mg/kg	< 10			10	Pass	
Vanadium			mg/kg	< 10			10	Pass	
Zinc			mg/kg	< 5			5	Pass	
LCS - % Recovery									
Heavy Metals									
Antimony			%	119			80-120	Pass	
Arsenic			%	112			80-120	Pass	
Barium			%	114			80-120	Pass	
Beryllium			%	110			80-120	Pass	
Boron			%	115			80-120	Pass	
Cadmium			%	107			80-120	Pass	
Chromium			%	118			80-120	Pass	
Cobalt			%	114			80-120	Pass	
Copper			%	118			80-120	Pass	
Lead			%	115			80-120	Pass	
Manganese			%	115			80-120	Pass	
Mercury			%	101			80-120	Pass	
Molybdenum			%	115			80-120	Pass	
Nickel			%	114			80-120	Pass	
Selenium			%	111			80-120	Pass	
Tin			%	115			80-120	Pass	
Vanadium			%	117			80-120	Pass	
Zinc			%	111			80-120	Pass	
Test	Lab Sample ID	QA Source	Units	Result 1			Acceptance Limits	Pass Limits	Qualifying Code
Spike - % Recovery									
Heavy Metals				Result 1					
Antimony	M23-Se0040692	NCP	%	112			75-125	Pass	
Arsenic	M23-Se0040692	NCP	%	110			75-125	Pass	
Barium	M23-Se0042213	NCP	%	114			75-125	Pass	
Beryllium	M23-Se0040692	NCP	%	103			75-125	Pass	
Boron	M23-Se0040692	NCP	%	107			75-125	Pass	
Cadmium	M23-Se0040692	NCP	%	110			75-125	Pass	
Chromium	M23-Se0040692	NCP	%	125			75-125	Pass	
Cobalt	M23-Se0040692	NCP	%	103			75-125	Pass	

Test	Lab Sample ID	QA Source	Units	Result 1			Acceptance Limits	Pass Limits	Qualifying Code
Copper	M23-Se0040692	NCP	%	125			75-125	Pass	
Lead	M23-Se0039143	NCP	%	84			75-125	Pass	
Manganese	M23-Se0042213	NCP	%	124			75-125	Pass	
Mercury	M23-Se0040692	NCP	%	105			75-125	Pass	
Molybdenum	M23-Se0040692	NCP	%	118			75-125	Pass	
Nickel	M23-Se0040692	NCP	%	108			75-125	Pass	
Selenium	M23-Se0040692	NCP	%	98			75-125	Pass	
Tin	M23-Se0040692	NCP	%	110			75-125	Pass	
Vanadium	M23-Se0040692	NCP	%	123			75-125	Pass	
Zinc	M23-Se0042213	NCP	%	104			75-125	Pass	
Test	Lab Sample ID	QA Source	Units	Result 1			Acceptance Limits	Pass Limits	Qualifying Code
Duplicate									
Heavy Metals				Result 1	Result 2	RPD			
Antimony	M23-Se0040692	NCP	mg/kg	< 10	< 10	<1	30%	Pass	
Arsenic	M23-Se0040692	NCP	mg/kg	7.3	7.3	<1	30%	Pass	
Barium	M23-Se0040692	NCP	mg/kg	80	80	<1	30%	Pass	
Beryllium	M23-Se0040692	NCP	mg/kg	< 2	< 2	<1	30%	Pass	
Boron	M23-Se0040692	NCP	mg/kg	< 10	< 10	<1	30%	Pass	
Cadmium	M23-Se0040692	NCP	mg/kg	< 0.4	< 0.4	<1	30%	Pass	
Chromium	M23-Se0040692	NCP	mg/kg	20	20	1.4	30%	Pass	
Cobalt	M23-Se0040692	NCP	mg/kg	7.7	7.9	2.2	30%	Pass	
Copper	M23-Se0040692	NCP	mg/kg	29	29	<1	30%	Pass	
Lead	M23-Se0040692	NCP	mg/kg	110	110	1.6	30%	Pass	
Manganese	M23-Se0040692	NCP	mg/kg	160	160	1.4	30%	Pass	
Mercury	M23-Se0040692	NCP	mg/kg	0.3	0.3	<1	30%	Pass	
Molybdenum	M23-Se0040692	NCP	mg/kg	< 5	< 5	<1	30%	Pass	
Nickel	M23-Se0040692	NCP	mg/kg	25	26	1.5	30%	Pass	
Selenium	M23-Se0040692	NCP	mg/kg	< 2	< 2	<1	30%	Pass	
Tin	M23-Se0040692	NCP	mg/kg	< 10	< 10	<1	30%	Pass	
Vanadium	M23-Se0040692	NCP	mg/kg	22	23	1.7	30%	Pass	
Zinc	M23-Se0040692	NCP	mg/kg	160	160	<1	30%	Pass	
Duplicate									
Sample Properties				Result 1	Result 2	RPD			
% Moisture	M23-Se0040657	NCP	%	24	21	15	30%	Pass	

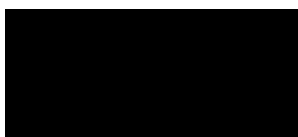
Comments**Sample Integrity**

Custody Seals Intact (if used)	N/A
Attempt to Chill was evident	Yes
Sample correctly preserved	Yes
Appropriate sample containers have been used	Yes
Sample containers for volatile analysis received with minimal headspace	Yes
Samples received within HoldingTime	N/A
Some samples have been subcontracted	No

Authorised by:

Catherine Wilson
Mary Makarios

Analytical Services Manager
Senior Analyst-Metal



Glenn Jackson
Managing Director

Final Report – this report replaces any previously issued Report

- Indicates Not Requested

* Indicates NATA accreditation does not cover the performance of this service

Measurement uncertainty of test data is available on request or please [click here](#).

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SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
Agent Address: 48 Hawker Road,
BURTON, SA, 5110
Client: Gary
Test Set or Quotation: H1
Barcode: 111085815
Batch Number: 34858
Submission ID: 112397

Report Date: 05/10/2023
Sampling Date: 22/09/2023
Date Received: 26/09/2023
Sample Name: Left Middle
Crop: Cereal
Sample Depth: 0-30
GPS Start: NA
GPS End: NA

	Analyte	Unit	Desired Level	Level Found	c.mol/kg	Very Low	Low	Acceptable	High	Excessive
Extractable N-P-K-S	MIR - Aus Soil Texture			Loam						
	ECEC	cmol/kg	5.00-25.0	28.9						
	Organic Carbon (NMB) ²	% (40°C)	0.90-1.80	1.55						
	pH 1:5 water	pH units	6.50-7.50	7.93						
	pH CaCl2 (following 4A1)	pH units	5.50-6.50	7.56						
	Nitrate - N (2M KCl)	mg/kg	10-50	210						
	Ammonium - N (2M KCl)	mg/kg	2.0-10	2.8						
	Colewell Phosphorus	mg/kg	22-30	110						
	PBI + Col P		35-70	70						
	MCP Sulfur (S)	mg/kg	4.0-10	120						
Exchangeable cations	Calcium (Ca) - AmmAc	mg/kg	600-1500	3940	19.7					
	Magnesium (Mg) - AmmAc	mg/kg	60-180	567	4.66					
	Potassium (K) - AmmAc	mg/kg	80-150	733	1.87					
	Sodium (Na) - AmmAc	mg/kg	15.0-120	620	2.70					
	Exchangeable aluminium	cmol/kg	0.10-0.35	<0.02						
Trace Elements	Exchangeable hydrogen	cmol/kg	0.10-0.35	<0.02						
	Boron	mg/kg	0.50-2.0	9.4						
	Iron (Fe)	mg/kg	10-70	14						
	Manganese (Mn)	mg/kg	1.0-10	4.5						
	Copper (Cu)	mg/kg	0.30-1.0	1.1						
Salt	Zinc (Zn)	mg/kg	0.80-1.5	5.0						
	Chloride	mg/kg	15-400	400						
	Salinity EC 1:5	dS/m	0.025-0.60	0.93						
Physical	Ece	dS/m	0.10-6.0	8.8						
	MIR - Clay	%		15.0						
	MIR - Sand (>20 micron)	%		68.5						
Ratios	MIR - Silt (2-20 micron)	%		16.5						
	Ca:Mg Ratio		2.0-8.0	4.2						
	K:Mg Ratio		0.10-0.50	0.40						

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
Agent Address: 48 Hawker Road,
BURTON, SA, 5110
Client: Gary
Test Set or Quotation: H1
Barcode: 111085815
Batch Number: 34858
Submission ID: 112397

Report Date: 05/10/2023
Sampling Date: 22/09/2023
Date Received: 26/09/2023
Sample Name: Left Middle
Crop: Cereal
Sample Depth: 0-30
GPS Start: NA
GPS End: NA



NOTE¹: Eurofins APAL will review published literature for crop desired levels, and reserves the right to make changes to this information in test reports as and when these reviews are conducted.

NOTE¹: Walkley and Black Organic Carbon % (40°C) data presented in this test report have been obtained by a combination of laboratory wet chemistry and the equivalent modelled result from Mid-Infrared Diffuse Reflectance Spectroscopy and Partial Least Squares Regression (PLSR) analysis. An explanatory technical note is available upon request. The exception is for quoted work that specifically required laboratory wet chemistry.

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
Agent Address: 48 Hawker Road,
BURTON, SA, 5110
Client: Gary
Test Set or
Quotation: H1
Barcode: 111085814
Batch Number: 34858
Submission ID: 112397

Report Date: 05/10/2023
Sampling Date: 22/09/2023
Date Received: 26/09/2023
Sample Name: Left Back
Crop: Cereal
Sample Depth: 0-30
GPS Start: NA
GPS End: NA

Analyte	Unit	Desired Level	Level Found	c.mol/kg	Very Low	Low	Acceptable	High	Excessive
MIR - Aus Soil Texture			Loam						
ECEC	cmol/kg	5.00-25.0	28.2						
Organic Carbon (W&B) ²	% (40°C)	0.90-1.80	1.56						
pH 1:5 water	pH units	6.50-7.50	7.74						
pH CaCl2 (following 4A1)	pH units	5.50-6.50	7.49						
Extractable N-P-K-S	Nitrate - N (2M KCl)	mg/kg	10-50	92					
	Ammonium - N (2M KCl)	mg/kg	2.0-10	1.3					
	Colwell Phosphorus	mg/kg	22-30	130					
	PBI + Col P		35-70	66					
	MCP Sulfur (S)	mg/kg	4.0-10	180					
Exchangeable cations	Calcium (Ca) - Amm/c	mg/kg	600-1500	4520	22.6				
	Magnesium (Mg) - Amm/c	mg/kg	60-180	414	3.40				
	Potassium (K) - Amm/c	mg/kg	80-150	572	1.46				
	Sodium (Na) - Amm/c	mg/kg	15.0-120	185	0.805				
	Exchangeable aluminium	cmol/kg	0.10-0.35	<0.02					
Trace Elements	Exchangeable hydrogen	cmol/kg	0.10-0.35	<0.02					
	Boron	mg/kg	0.50-2.0	6.9					
	Iron (Fe)	mg/kg	10-70	18					
	Manganese (Mn)	mg/kg	1.0-10	3.2					
	Copper (Cu)	mg/kg	0.30-1.0	0.83					
Salt	Zinc (Zn)	mg/kg	0.80-1.5	5.3					
	Chloride	mg/kg	15-400	140					
	Salinity EC 1:5	dS/m	0.025-0.60	0.92					
Physical	Ece	dS/m	0.10-6.0	8.8					
	MIR - Clay	%		11.4					
	MIR - Sand (>20 micron)	%		72.7					
Ratios	MIR - Silt (2-20 micron)	%		15.8					
	Ca:Mg Ratio		2.0-8.0	6.6					
	K:Mg Ratio		0.10-0.50	0.43					

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
 Agent Address: 48 Hawker Road,
 BURTON, SA, 5110
 Client: Gary
 Test Set or
 Quotation: H1
 Barcode: 111085814
 Batch Number: 34858
 Submission ID: 112397

Report Date: 05/10/2023
 Sampling Date: 22/09/2023
 Date Received: 26/09/2023
 Sample Name: Left Back
 Crop: Cereal
 Sample Depth: 0-30
 GPS Start: NA
 GPS End: NA



NOTE¹: Eurofins APAL will review published literature for crop desired levels, and reserves the right to make changes to this information in test reports as and when these reviews are conducted.

NOTE²: Walkley and Black Organic Carbon % (40°C) data presented in this test report have been obtained by a combination of laboratory wet chemistry and the equivalent modelled result from Mid-Infrared Diffuse Reflectance Spectroscopy and Partial Least Squares Regression (PLSR) analysis. An explanatory technical note is available upon request. The exception is for quoted work that specifically required laboratory wet chemistry.

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
 Agent Address: 48 Hawker Road,
 BURTON, SA, 5110
 Client: Gary
 Test Set or
 Quotation: H1
 Barcode: 111085811
 Batch Number: 34858
 Submission ID: 112397

Report Date: 05/10/2023
 Sampling Date: 22/09/2023
 Date Received: 26/09/2023
 Sample Name: Right Front
 Crop: Cereal
 Sample Depth: 0-30
 GPS Start: NA
 GPS End: NA

	Analyte	Unit	Desired Level	Level Found	c.mol/kg	Very Low	Low	Acceptable	High	Excessive
Extractable N-P-K-S	MR - Aus Soil Texture			Loam						
	ECEC	cme/kg	5.00-25.0	25.6						
	Organic Carbon (NMB) %	% (40°C)	0.90-1.80	1.35						
	pH 1:5 water	pH units	6.50-7.50	7.88						
	pH CaCl2 (following 4A1)	pH units	5.50-6.50	7.49						
	Nitrate - N (2M KCl)	mg/kg	10-50	52						
	Ammonium - N (2M KCl)	mg/kg	2.0-10	1.1						
	Celwell Phosphorus	mg/kg	29-36	130						
	PBI + Col P		35-70	71						
	MCP Sulfur (S)	mg/kg	4.0-10	140						
Exchangeable cations	Calcium (Ca) - Amm/c	mg/kg	600-1500	3590	17.9					
	Magnesium (Mg) - Amm/c	mg/kg	50-180	513	4.22					
	Potassium (K) - Amm/c	mg/kg	80-150	723	1.85					
	Sodium (Na) - Amm/c	mg/kg	15.0-120	378	1.64					
	Exchangeable aluminium	cme/kg	0.10-0.35	<0.02						
Trace Elements	Exchangeable hydrogen	cme/kg	0.10-0.35	<0.02						
	Boron	mg/kg	0.50-2.0	8.8						
	Iron (Fe)	mg/kg	10-70	14						
	Manganese (Mn)	mg/kg	1.0-10	3.1						
	Copper (Cu)	mg/kg	0.30-1.0	1.2						
Salt	Zinc (Zn)	mg/kg	0.80-1.5	5.8						
	Chloride	mg/kg	15-400	260						
	Salinity EC 1:5	dS/m	0.025-0.60	0.65						
Physical	Ece	dS/m	0.10-6.0	6.1						
	MR - Clay	%		14.5						
	MR - Sand (>20 micron)	%		68.0						
Ratios	MR - Silt (2-20 micron)	%		17.5						
	Ce:Mg Ratio		2.0-8.0	4.2						
	N:Mg Ratio		0.10-0.50	0.44						

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
 Agent Address: 48 Hawker Road,
 BURTON, SA, 5110
 Client: Gary
 Test Set or
 Quotation: H1
 Barcode: 111085811
 Batch Number: 34858
 Submission ID: 112397

Report Date: 05/10/2023
 Sampling Date: 22/09/2023
 Date Received: 26/09/2023
 Sample Name: Right Front
 Crop: Cereal
 Sample Depth: 0-30
 GPS Start: NA
 GPS End: NA



NOTE: Eurofins APAL will review published literature for crop desired levels, and reserves the right to make changes to this information in test reports as and when these reviews are conducted.

NOTE: Walkley and Black Organic Carbon (40%) data presented in this test report have been obtained by a combination of laboratory wet chemistry and the equivalent modelled result from Mid-Infrared Diffuse Reflectance Spectroscopy and Partial Least Squares Regression (PLSR) analysis. An explanatory technical note is available upon request. The exception is for quoted work that specifically required laboratory wet chemistry.

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
Agent Address: 48 Hawker Road,
BURTON, SA, 5110
Client: Gary
Test Set or Quotation: H1
Barcode: 111085811
Batch Number: 34858
Submission ID: 112397

Report Date: 05/10/2023
Sampling Date: 22/09/2023
Date Received: 26/09/2023
Sample Name: Right Front
Crop: Cereal
Sample Depth: 0-30
GPS Start: NA
GPS End: NA

	Analyte	Unit	Desired Level	Level Found	c.mol/kg	Very Low	Low	Acceptable	High	Excessive
Extractable N-P-K-S	MR - Aus Soil Texture			Loam						
	ECEC	cmol/kg	5.00-25.0	25.6						
	Organic Carbon (W&B) ²	% (40°C)	0.90-1.80	1.35						
	pH 1:5 water	pH units	6.50-7.50	7.88						
	pH CaCl2 (following 4A1)	pH units	5.50-6.50	7.49						
	Nitrate - N (2M KCl)	mg/kg	10-50	52						
	Ammonium - N (2M KCl)	mg/kg	2.0-10	1.1						
	Colewell Phosphorus	mg/kg	29-36	130						
	PBI + Col P		35-70	71						
	MCP Sulfur (S)	mg/kg	4.0-10	140						
Exchangeable cations	Calcium (Ca) - Amm/c	mg/kg	600-1500	3590	17.9					
	Magnesium (Mg) - Amm/c	mg/kg	60-180	513	4.22					
	Potassium (K) - Amm/c	mg/kg	80-150	723	1.85					
	Sodium (Na) - Amm/c	mg/kg	15.0-120	378	1.64					
	Exchangeable aluminium	cmol/kg	0.10-0.35	<0.02						
	Exchangeable hydrogen	cmol/kg	0.10-0.35	<0.02						
Trace Elements	Boron	mg/kg	0.50-2.0	8.8						
	Iron (Fe)	mg/kg	10-70	14						
	Manganese (Mn)	mg/kg	1.0-10	3.1						
	Copper (Cu)	mg/kg	0.30-1.0	1.2						
	Zinc (Zn)	mg/kg	0.80-1.5	5.8						
Salt	Chloride	mg/kg	15-400	260						
	Salinity EC 1:5	dS/m	0.025-0.60	0.65						
	Ece	dS/m	0.10-6.0	6.1						
Physical	MR - Clay	%		14.5						
	MR - Sand (>20 micron)	%		68.0						
	MR - Silt (2-20 micron)	%		17.5						
Ratios	Ca:Mg Ratio		2.0-8.0	4.2						
	K:Mg Ratio		0.10-0.50	0.44						

SOIL ANALYSIS

Agent: Growers Supplies (SA) Pty Ltd
Agent Address: 48 Hawker Road,
BURTON, SA, 5110
Client: Gary
Test Set or Quotation: H1
Barcode: 111085810
Batch Number: 34858
Submission ID: 112357

Report Date: 05/10/2023
Sampling Date: 22/09/2023
Date Received: 26/09/2023
Sample Name: Right Back
Crop: Cereal
Sample Depth: 0-30
GPS Start: NA
GPS End: NA



NORE's Eurofins APAL will review published literature for crop desired levels, and reserves the right to make changes to this information in test reports as and when these reviews are conducted.

NORE's Walkley and Black Organic Carbon % (WOC) data presented in this test report have been obtained by a combination of laboratory wet chemistry and the equivalent modelled result from Mid-Infrared Diffuse Reflectance Spectroscopy and Partial Least Squares Regression (PLSR) analysis. An explanatory technical note is available upon request. The exception is for quoted work that specifically required laboratory wet chemistry.

DTI:PlanSA Submissions

From: Sarah Lowe [REDACTED]
Sent: Monday, 6 November 2023 1:49 PM
To: DTI:PlanSA Submissions
Cc: Tim Beazley; Mark Staffin [REDACTED] Tony Emanuele; Michelle Papalia; Danny De Ieso; Grazio Maiorano
Subject: GARP Discussion Paper Submission - Waterloo Corner
Attachments: 230911 V1 Submission on GARP.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Good afternoon,

Please find attached a submission prepared on behalf of Shahin Corporation Pty Ltd & Shahin Brothers Pty Ltd, Daniele Raffaele De Ieso, T & J Mumford Property Pty Ltd and BTR Excavations Pty Ltd and Kiatia Pty Ltd (our clients).

Kind regards,

Sarah



Sarah Lowe
Consultant
[REDACTED]

27 Halifax Street
Enter via Symonds PI
Adelaide SA 5000
08 8333 7999

Kaurna Country

My working hours are:
Monday to Friday 8.30am-5.00pm

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Melbourne VIC 3000

03 8593 9650

urps.com.au

6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Waterloo Corner Code Amendment

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan (GARP) Discussion Paper. We welcome the opportunity to contribute to such an important plan for South Australia.

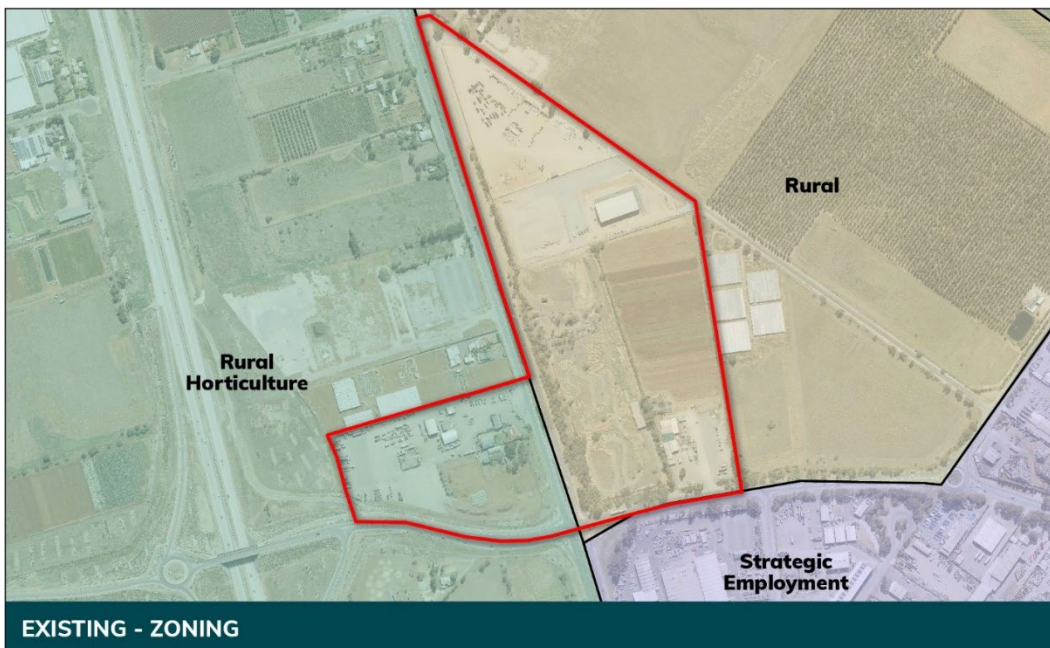
URPS is writing on behalf of a group of landowners at Waterloo Corner. These include Shahin Corporation Pty Ltd & Shahin Brothers Pty Ltd, Daniele Raffaele De Ieso, T & J Mumford Property Pty Ltd and BTR Excavations Pty Ltd and Kiatia Pty Ltd (the Proponents).

The proponents have recently lodged a Proposal to Initiate a Code Amendment to rezone the land from Rural and Rural Horticulture to Employment Zone. We are writing to offer support to the proposal within the GARP Discussion Paper that this land at Waterloo Corner be rezoned for employment purposes.

Affected Land

A Proposal to Initiate a Code Amendment was submitted to PLUS on 28 February 2023 for land at Waterloo Corner (refer to Figure 1). The Code Amendment seeks to rezone the land from Rural and Rural Horticulture to Employment Zone. There have been a series of delays in considering this proposal due to a lack of strategic transport planning in the area, which is required to unlock development opportunities.

The Affected Area has dual frontages to Waterloo Corner Road and Port Wakefield Road. It is currently Zoned Rural and Rural Horticulture as shown in Figure 1. The southern boundary of the site abuts the Strategic Employment Zone.



We understand that PLUS and the Department of Infrastructure and Transport (DIT) are in discussions regarding regional transportation issues. We contend that these discussions should not preclude the approval of the Proposal to Initiate a Code Amendment (submitted in February 2023). If the State desires land for road widening purposes, it can flag it now and the Proponents will be willing to engage in the discussions. In addition, the State can introduce the “Future Road Widening Overlay” within the Code Amendment. The Overlay triggers a referral to the Commissioner of Highways. The Commissioner has the right to direct the planning authority to refuse any inappropriate development application and thereby safeguarding the State’s interests.

Extracts from the GARP Discussion Paper

The Discussion Paper notes that the GARP will identify growth over a 15-30 year period by investigating and guiding where employment land will go. We note the inter-relationship between employment land and population growth and infrastructure required to be provided to support growth.

As identified in the Discussion Paper employment land needs to be distributed to meet local demand, reduce travel times and ensure that there is a mix of land uses considered in future development.

Employment land that is supported by strategic infrastructure such as major roadways should be leveraged by the planning system. The location of the Affected Area on Pt Wakefield Road and Waterloo Corner Road provides opportunity for this infrastructure to leverage urban development. The Discussion Paper also promotes the need to

ensure there is sufficient employment land available in northern Adelaide to service the growing population.

With reference to Figure 15 (page 159) of the Discussion Paper we acknowledge that the Affected Area is identified as a proposed employment growth area.

Justification

The Proponents supports the identification of this land for employment purposes. It notes:

- The land's location leverages the identified north-eastern spine investigation area and capitalises on significant road investment.
- The land is relatively flat and suitable for large format industrial / bulky goods buildings and laydown areas.
- The land is not used for highly productive primary production.
- The land has previously been identified for industrial / bulk goods zoning.

The land to the east of Port Wakefield Road was identified within the Greater Edinburgh Parks Urban Growth Area of the DPTI, Playford Growth Area Structure Plan (December 2013). The Greater Edinburgh Parks area has been identified for high quality, enterprise and employment destination attracting a specialised workforce and providing a focus for manufacturing, research and technology, logistics and transport services, intermodal operations and expansion of defence industries. This is demonstrated in Figure 2 below - Playford Area Structure Plan. This historical work is consistent with the strategic approach for this land within the Discussion Paper

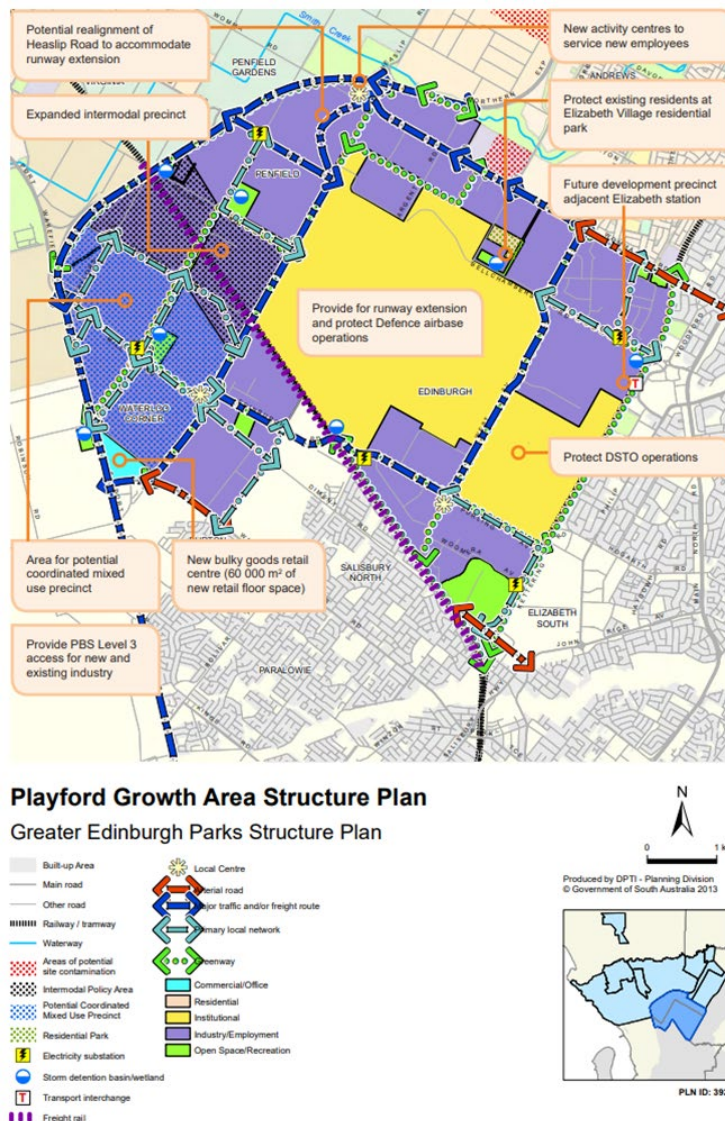


Figure 2 Playford Area Structure Plan (2013)

Alignment with the GARP Discussion Paper

Projections show that Greater Adelaide's population could grow by up to 670,000 people over the next 30 years. In order to provide appropriate housing and employment for these additional 670,000 people, targeted greenfield and infill development needs to occur. Significant investigations have been undertaken to identify investigation areas for these purposes.

The Discussion Paper has highlighted the importance of connected communities. With established residential areas to the south and significant development identified

surrounding the Affected Area, easily accessible employment land is critical to servicing these new and established areas. The future development intent aligns with these principles.

As the population of Greater Adelaide grows, new business and employment opportunities will be required to support this growth.

Desired outcome

We encourage the Commission to continue to identify the Affected Area as an employment land opportunity on the north-western spine in the draft GARP.

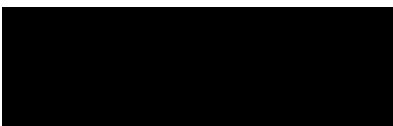
Conclusion

We are supportive of the intent of the Discussion Paper and the identified growth areas.

We encourage the State to progress the submitted Proposal to Initiate a Code Amendment and encourage the development of employment creating land uses.

We are eager to continue to work with the Commission, government agencies and the City of Salisbury to ensure the development of this land and the delivery of employment objectives through a Code Amendment.

Yours sincerely



Sarah Lowe
Consultant

DTI:PlanSA Submissions

From: Emily Nankivell [REDACTED]
Sent: Thursday, 2 November 2023 4:14 PM
To: DTI:PlanSA Submissions
Cc: Chloe Vounasis
Subject: Submission to the Discussion Paper on the Greater Adelaide Regional Plan - Port Wakefield Road, Buckland Park
Attachments: Submission to the GARP Port Wakefield Road.pdf

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Dear Growth Management Team,

Please see **attached** submission to the Discussion Paper for the Greater Adelaide Regional Plan in relation to land at Port Wakefield Road, Buckland Park.

Please confirm receipt of the submission.

Kind regards,

EMILY NANKIVELL
Associate Director



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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November 2, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001
Via email: plansasubmissions@sa.gov.au

Dear Mr Holden,

SUBMISSION TO THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for the owners of fourteen contiguous allotments of land located to the west of Port Wakefield Road at Buckland Park, between McEvoy Road and Carmelo Road with a total land size of 182 hectares and formally described as:

- Allotment 17 in Certificate of Title Volume 5253 Folio 6;
- Allotment 239 in Certificate of Title Volume 5798 Folio 859;
- Allotment 1 in Certificate of Title Volume 5451 Folio 15;
- Allotment 2 in Certificate of Title Volume 5451 Folio 379;
- Allotment 1 in Certificate of Title Volume 5337 Folio 534;
- Allotment 42 in Certificate of Title Volume 5885 Folio 597;
- Allotment 71 in Certificate of Title Volume 5338 Folio 216;
- Allotment 72 in Certificate of Title Volume 5338 Folio 217;
- Allotment 73 in Certificate of Title Volume 5338 Folio 218;
- Allotment 74 in Certificate of Title Volume 5338 Folio 219;
- Allotment 75 in Certificate of Title Volume 5338 Folio 220;
- Allotment 76 in Certificate of Title Volume 5885 Folio 604;
- Allotment 77 in Certificate of Title 5338 Folio 213;
- Allotment 78 in Certificate of Title Volume 5338 Folio 214; and
- Allotment 79 in Certificate of Title Volume 5338 Folio 215.

Together referred to as “the land” and demonstrated in **Figure 1**.

The Discussion Paper (Discussion Paper) on the Greater Adelaide Regional Plan (GARP) identifies the general area where the land is located as an investigation area for future residential growth (refer **Figure 2**).

Figure 1 *The Land and Current Zoning*

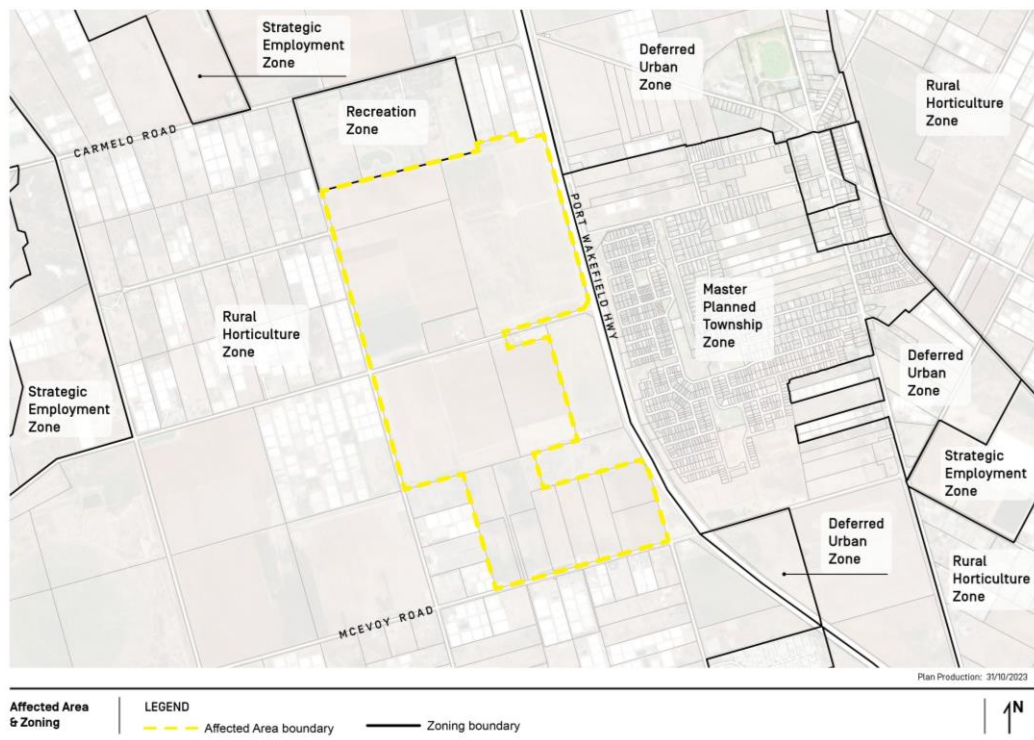
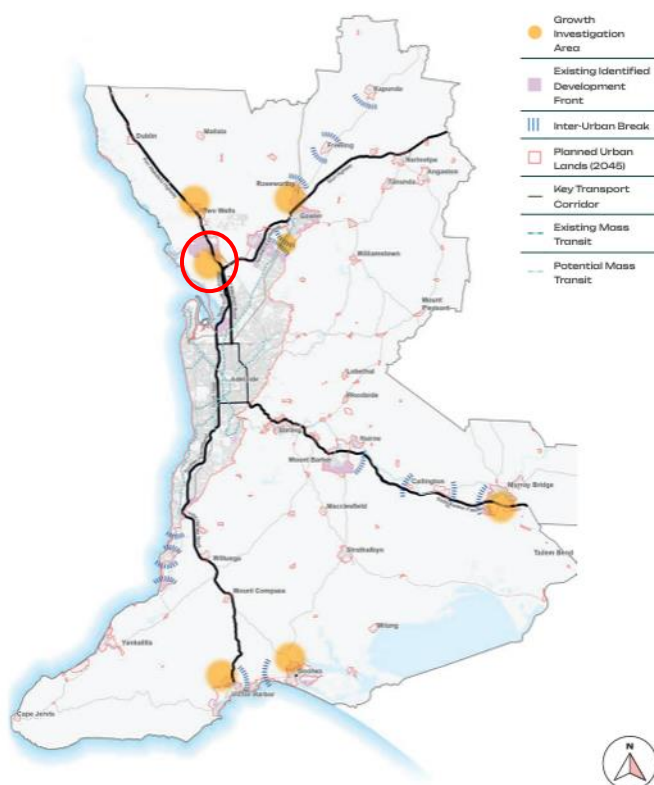


Figure 2 *Proposed Areas of Investigation: Greenfield and satellite city growth taken from page 126 of the Discussion Paper. The relevant investigation area identified by the red circle.*

Figure 9 – Proposed areas of investigation
Greenfield and satellite city growth



The owners of the land are pleased to see this location identified as a residential growth investigation area and are supportive of the land being included as such in the GARP. Importantly, identifying growth opportunities in the broader area will ensure that future growth and infrastructure to support growth in the area occurs in a strategic and coordinated way.

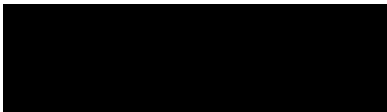
The owners of the land are in the process of preparing a Proposal to Initiate for the purpose of pursuing a future Code Amendment to deliver the State Planning Commission's vision for this area. In doing so, the owners of the land intend to take a strategic approach to infrastructure delivery to ensure this occurs in a coordinated way.

In the context of the broader area, that includes The Palms Housing Estate being developed by Walker Corporation, the inclusion of the land in the GARP as part of a future residential growth area results in a logical and appropriate planning outcome.

In addition to residential growth, the owners of the land are open to considering non-residential land uses (i.e. employment uses, other local services) on a portion of the land adjoining Port Wakefield Road. Doing this would ensure that future residential development is appropriately supported by local services and jobs, which would support the concept of living locally in the area.

Thank you for your consideration of this submission.

Yours sincerely,

A solid black rectangular box used to redact the signature of Chris Vounasis.

Chris Vounasis
Managing Director

14 December 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: SUBMISSION ON GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER – OPPORTUNITY FOR FUTURE EMPLOYMENT & HOUSING GROWTH – DUBLIN GREEN CIRCULAR ECONOMY PRECINCT

We act for Leinad Land Developments Dublin Pty Ltd [‘Leinad’] who own and control land within and surrounding the township of Dublin on the Northern Plains of the Greater Adelaide Planning Region.

This submission has been prepared in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper (the ‘Discussion Paper’) and seeks the State Planning Commission’s (SPC) consideration of the ‘Site’ as a potential future employment and housing growth area.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper and for seeking stakeholder and community input to inform the preparation of the next Regional Plan for Greater Adelaide.

In making this submission we note that the Adelaide Plains Council, at its meeting on 23 October 2023, adopted a submission on the GARP. In doing so, the Council has requested that the GARP provides spatial and timing clarity for growth at Dublin. This position is consistent with the **Council’s ‘Growth Strategy and Action Plan’ the supports further growth at Dublin** subject to further investigations being undertaken.

Leinad’s vision is to create the ‘**Dublin Green Circular Economy Precinct**’ that will transform an underutilised site into South Australia’s first green industrial, residential, and clean energy economy using sustainable technologies. This project provides the opportunity to act quickly and support the ambitions of the State Government set out in the South Australia Economic Statement¹ to deliver a smart, sustainable and inclusive future.

For the reasons discussed below, it is our opinion that **the land is ideally suited for employment** (that is differentiated from other metropolitan industrial areas) **and modest housing growth** (approximately 1,300 dwellings) **to support the**

¹ <https://www.premier.sa.gov.au/south-australian-economic-statement>

function and viability of the Dublin township and this opportunity should be captured in the next Greater Adelaide Regional Plan.

With the land being in single ownership and unconstrained to achieve this vision, the site presents a real opportunity to deliver significant benefits to the South Australian economy and the state's ambitions for economic transformation supporting its green economy credentials.

1. THE SUBJECT LAND

Leinad has control of in excess of 1,373 hectares of land over multiple land parcels within and to the immediate south of the existing Dublin Township.

The combined land parcels have frontage to Old Port Wakefield Road, Clonan Road, Thompsons Beach Road and Ruskin Road to the north and are shown spatially in **Figure 1.1** below.

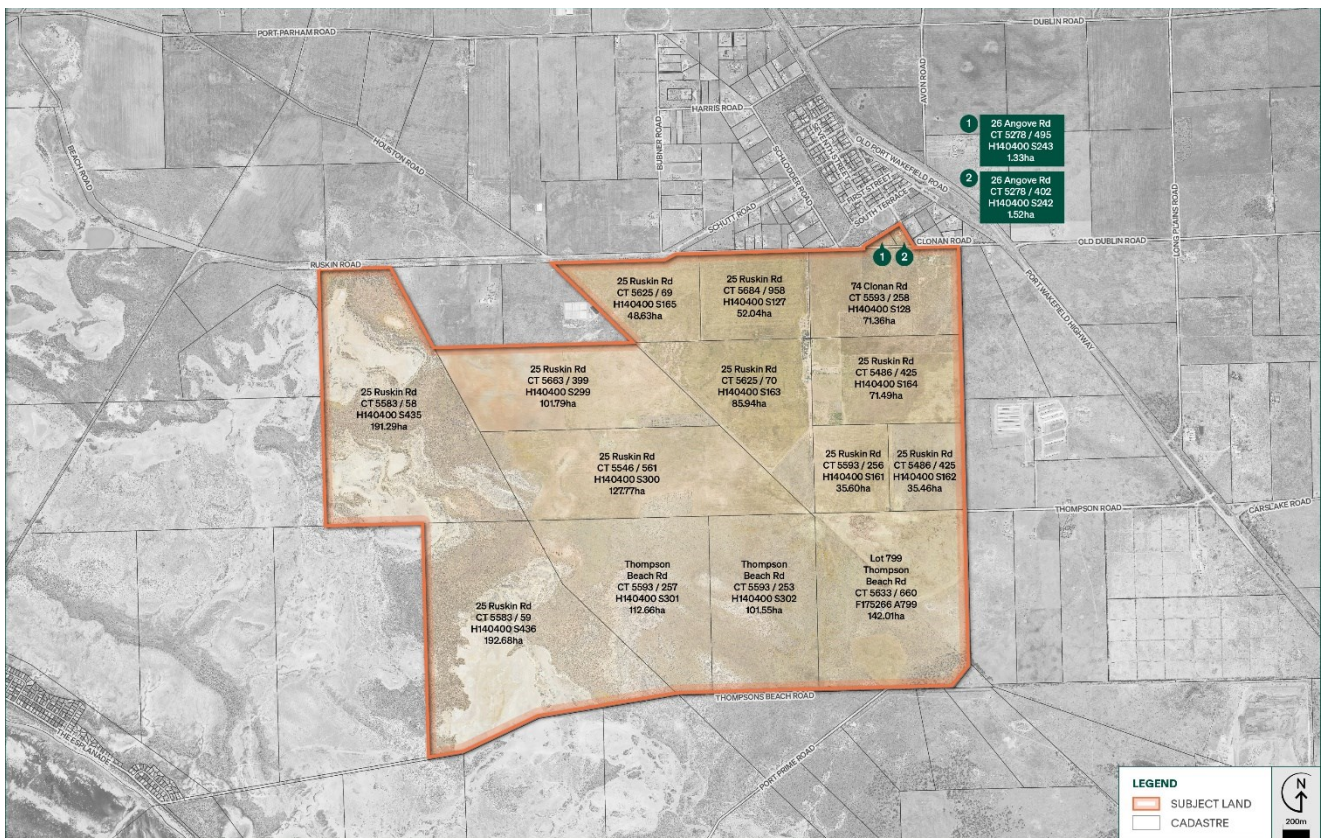


Figure 1.1 – Subject Site

The significant majority of the subject land has been utilised for ad-hoc agricultural purposes (low intensity grazing) and is in a relatively poor condition and of a 'degraded' land quality, with a low agricultural production value. The western part of the subject land comprises intact samphire and saltmarsh vegetation.

There is a Mineral Claim in the south-eastern corner of the site, with a mining plan currently being established for the site to detail the final landform and staged operations. This mining area provides a critical resource and opportunity for the future vision of the land.

2. THE LOCALITY & CONTEXT

2.1. Location

Dublin is a small town of less than 200 people strategically located on the Adelaide Plains to the north of Adelaide. Dublin is located approximately 50 kilometres north of the Adelaide CBD, and is approximately 35 kilometres to the south of Port Wakefield and 15 kilometres to the west of Mallala. Dublin's location along Port Wakefield Highway provides convenient access to the State's north where **significant investments in renewable energy infrastructure (wind and solar) and hydrogen** are taking place as illustrated in **Figures 2.1** and **2.2** below.

The subject land itself sits within a locality that includes:

- The Dublin township;
- Agricultural lands to the north-west, south and east;
- The Winaityinaityi Pangkara 'Adelaide International Bird Sanctuary' located along the western boundary of the land (this National Park encompasses over 60 kilometres of coastline north of Adelaide);
- An intensive animal keeping facility (Chicken Broiler Farm) located to the east;
- The 'IWS Waste Bale Fill Facility' and 'Composting Facility' to the immediate south;
- The 'Carslake Road Strategic Employment Land' on the opposite side of the Port Wakefield Highway; and
- Defence Operations at the Proof and Experimental Establishment Port Wakefield situated to the north near the Dublin township.

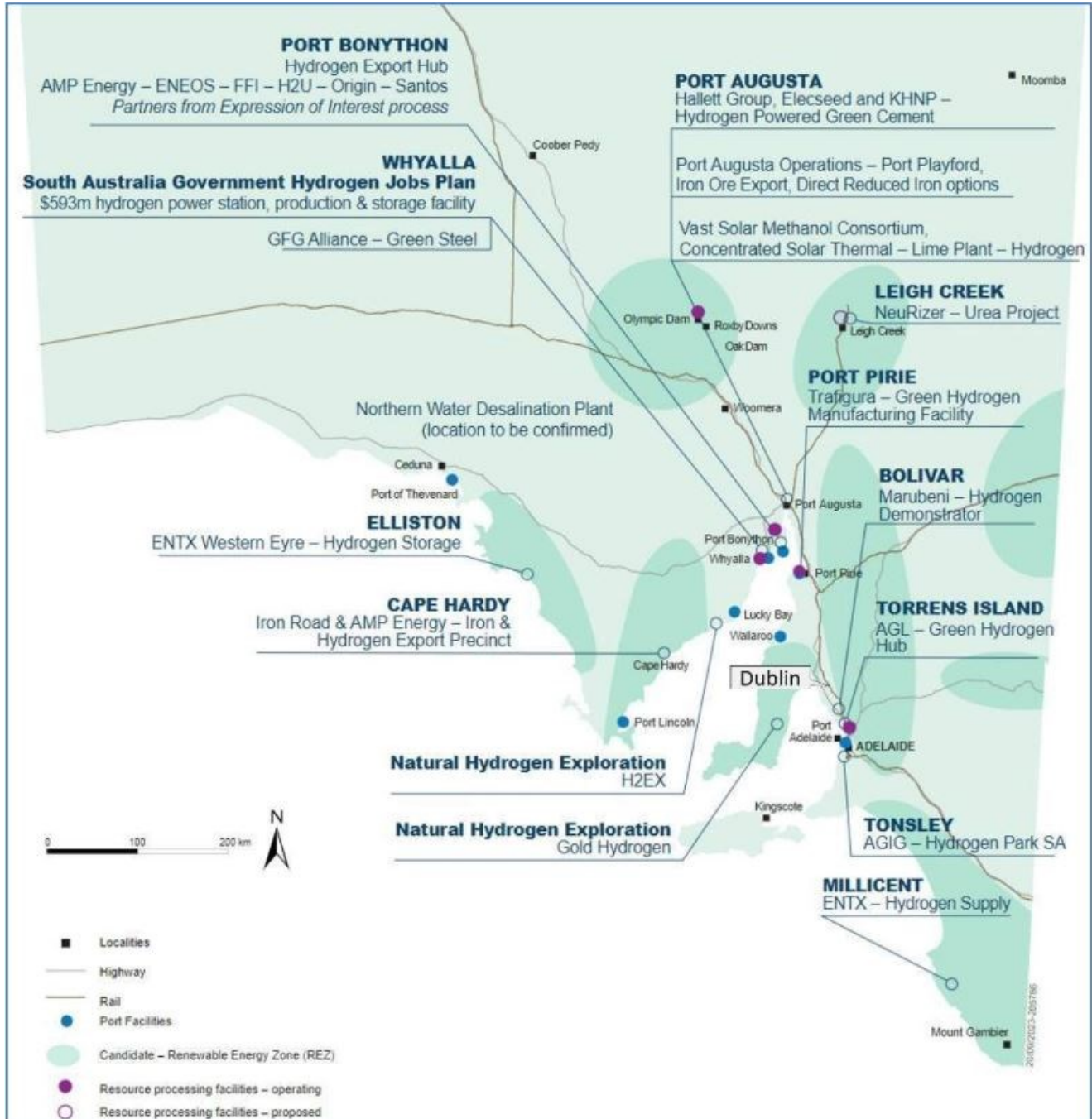


Figure 2.1 - SA Hydrogen Projects (Source: Government of South Australia)

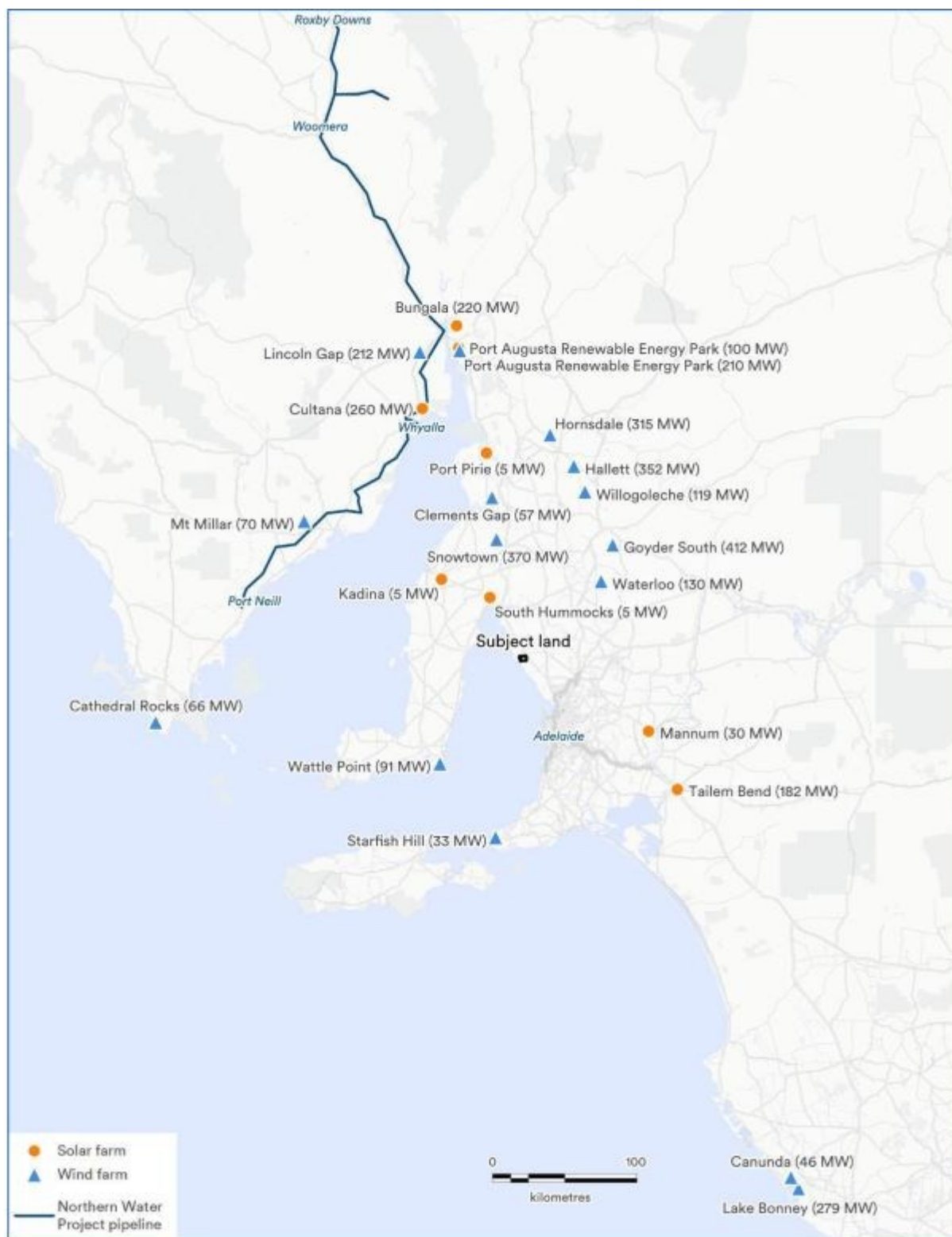


Figure 2.2 – Significant State Hydrogen and Energy (Wind & Solar) Infrastructure Projects (Source: Deep End Services)

2.2. Local Strategic Context

In May 2023, the Adelaide Plains Council released the final Adelaide Plains ‘Growth Strategy and Action Plan’ (GSAP). The GSAP identifies that planning for population growth of the Adelaide Plains is important, as population is forecast to double over the next 20 years. The GSAP notes that growth within the Adelaide Plains is part of the outer north that is being planned for the greatest amount of fringe growth in Greater Adelaide.

A key initiative of the GSAP is the establishment of a ‘three town service model’ with sustainable growth within Two Wells, Mallala and Dublin (refer to **Figure 2.3** below).



Figure 2.3 – The ‘Three town service model’, (Source: Adelaide Plains Council Growth Strategy and Action Plan, May 2023)

Council has identified that the majority of residential population growth is expected at Two Wells which could ultimately grow to 13,400 people with further residential growth opportunities at Dublin, subject to further investigations, rezoning and infrastructure planning.

The GSAP identifies the Dublin township has the potential for around 4,000 residents/1,500 dwellings in total. The report confirms that if land under the control of Leinad to the south of the existing township was fully developed by 2040, this would lead to a total population in Dublin of around 4,500 (refer to **Figure 2.4** below)

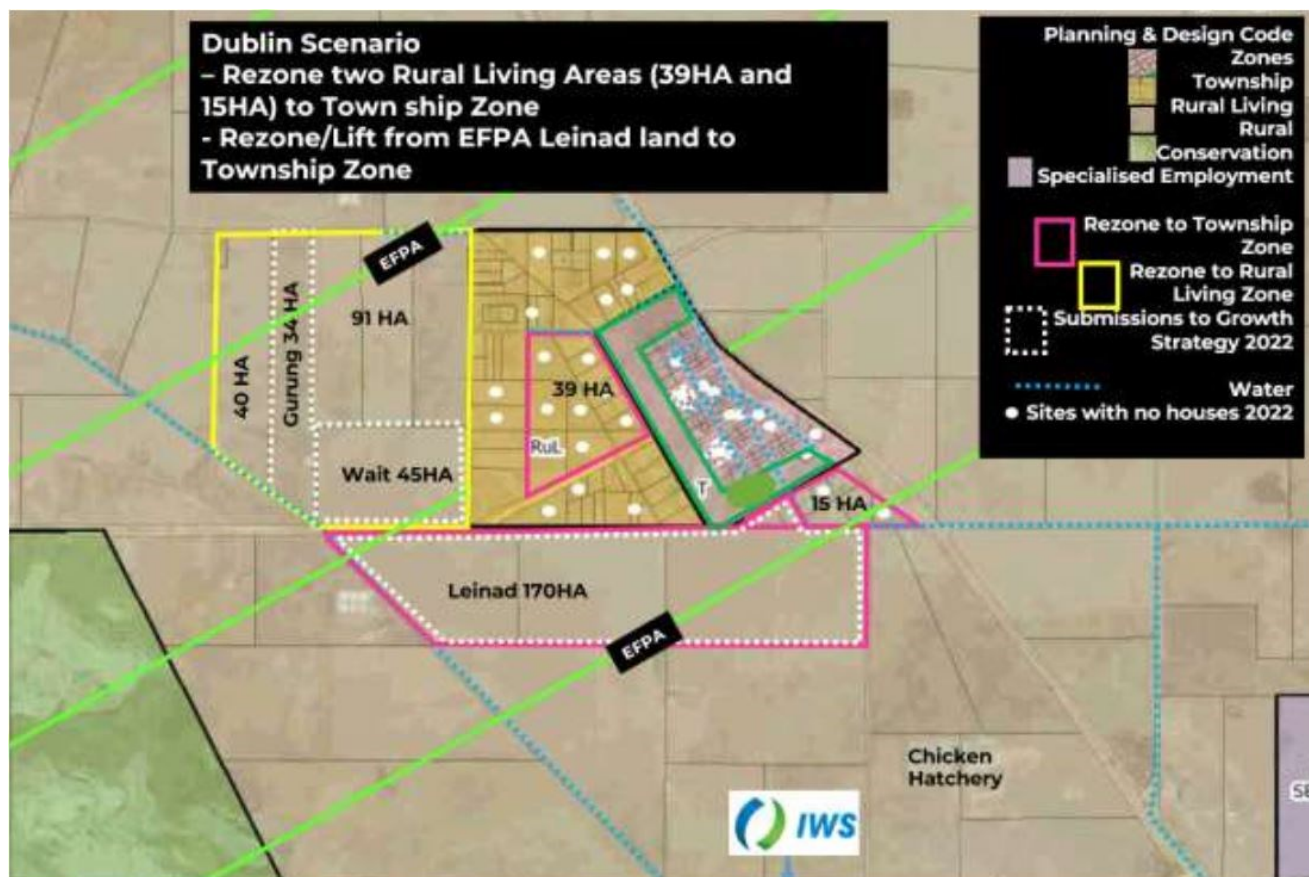


Figure 2.4 – Adelaide Plains Growth Strategy and Action Plan, May 2023

The Adelaide Plains Council as part of its submission on the GARP (adopted on 23 October 2023) has called for the GARP to provide spatial and timing clarity for growth in Dublin.

The GSAP has also been informed by recent resolutions of the Adelaide Plains Council supporting future urban growth and development on the subject land, to the south of the Dublin township.

On 22 July 2019, at its Ordinary Council Meeting, a 'Motion on Notice' led to the following resolution of the Adelaide Plains Council:

"that the Chief Executive Officer formally write to the Department of Planning, Transport and infrastructure and the Minister for Planning to give advanced notice of Adelaide Plains Council's desire to have strategic holdings reviewed throughout the Council area as part of the imminent Environment Food Production Areas review process."

Following the resolution in July 2019, Council subsequently wrote to the then Minister for Transport, Infrastructure and Local Government, to implement the above resolution.

Following formal requests by Leinad (and the Hicks Group regarding a potential development at Two Wells), Council at its Ordinary Meeting on 23 September 2019, unanimously carried the following resolution:

"that **Council**, having considered Item 21.5 - Environment and Food Production Areas, dated 23 September 2019, receives and notes the report and in doing so **authorises the Chief Executive Officer to:-**

1) progress the review of relevant strategic holdings that are currently impacted by the Environment and Food Production Areas legislation with the Department of Planning, Transport and infrastructure and the State Planning Commission as part of the 5 yearly review of the Planning, Development and infrastructure Act 2016 (Section 7).

2) **provide in principle letters of support to Leinad Land Developments (Dublin) Pty Ltd** and the Hicks Group to enable both parties **to advocate for boundary changes to the Environment and Food Production Areas and allow the future progression of long term rezoning objectives** as outlined in Attachments 1 and 2 to this Report."

['Our Emphasis']

On 24 October 2019, the Chief Executive of the Adelaide Plains Council subsequently wrote to Leinad and confirmed that:

*"As per Council resolutions 2019/323 and 2019/412 above, **Adelaide Plains Council is pleased to provide in-principle support to Leinad Land Developments to advocate for boundary changes to the EFPA to allow for the future progression of long term rezoning objectives for the expansion of the Dublin township.**"* *[our emphasis].*

['Our Emphasis']

A copy of this correspondence from Council is provided within **Appendix 1**.

2.3. Existing Zone & Policy Framework

The subject land is located both within the ‘**Rural Zone**’ and ‘**Conservation Zone**’ of the Planning and Design Code (version 2023.15 dated 26 October 2023) as shown in **Figure 2.5** below.

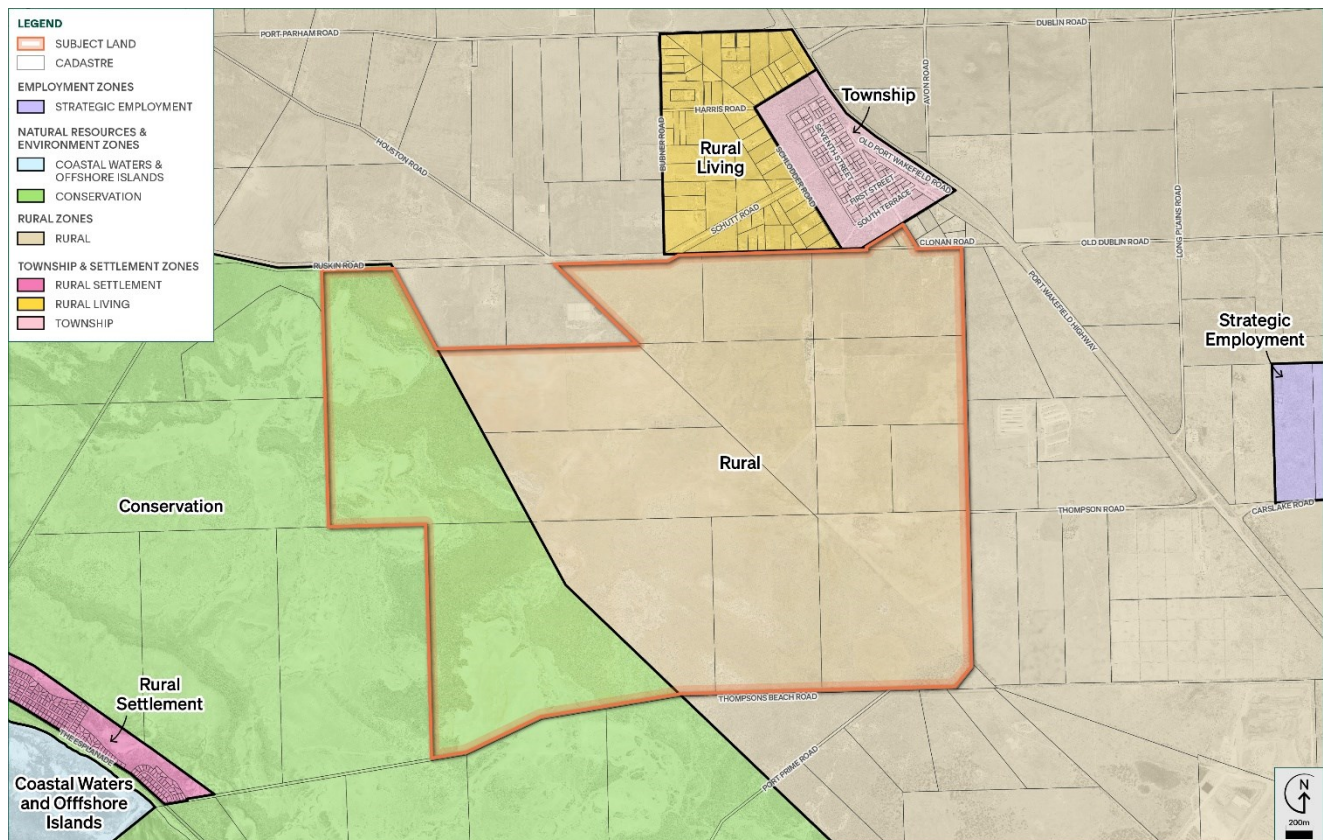


Figure 2.5 – Current Zoning

The subject land is affected by a number of ‘**Overlays**’ as follows:

- Coastal Areas Overlay
- Environment and Food Production Area Overlay
- Hazards (Acid Sulphate Soils) Overlay
(Applies only to western portion of the site)
- Hazards (Bushfire - General) Overlay
- Hazards (Bushfire - Medium Risk) Overlay
- Hazards (Flooding - Evidence Required) Overlay
- Native Vegetation Overlay
- State Significant Native Vegetation Overlay
- Traffic Generating Development Overlay
- Water Resources Overlay

Importantly, Leinad’s future vision does not intend to alter the zoning or other planning provisions that apply to the section of subject land that is located within the existing ‘Conservation Zone’.

2.4. Environment & Food Protection Area

The subject land is located within the 'Environment and Food Production Area (EFPA)' (refer to **Figure 2.6**). The EFPA was introduced by the Minister for Planning on 1 December 2017 to protect food producing and rural areas from urban encroachment and encourage residential development within the existing urban footprint. Land division for residential purposes is prevented within the EFPA.

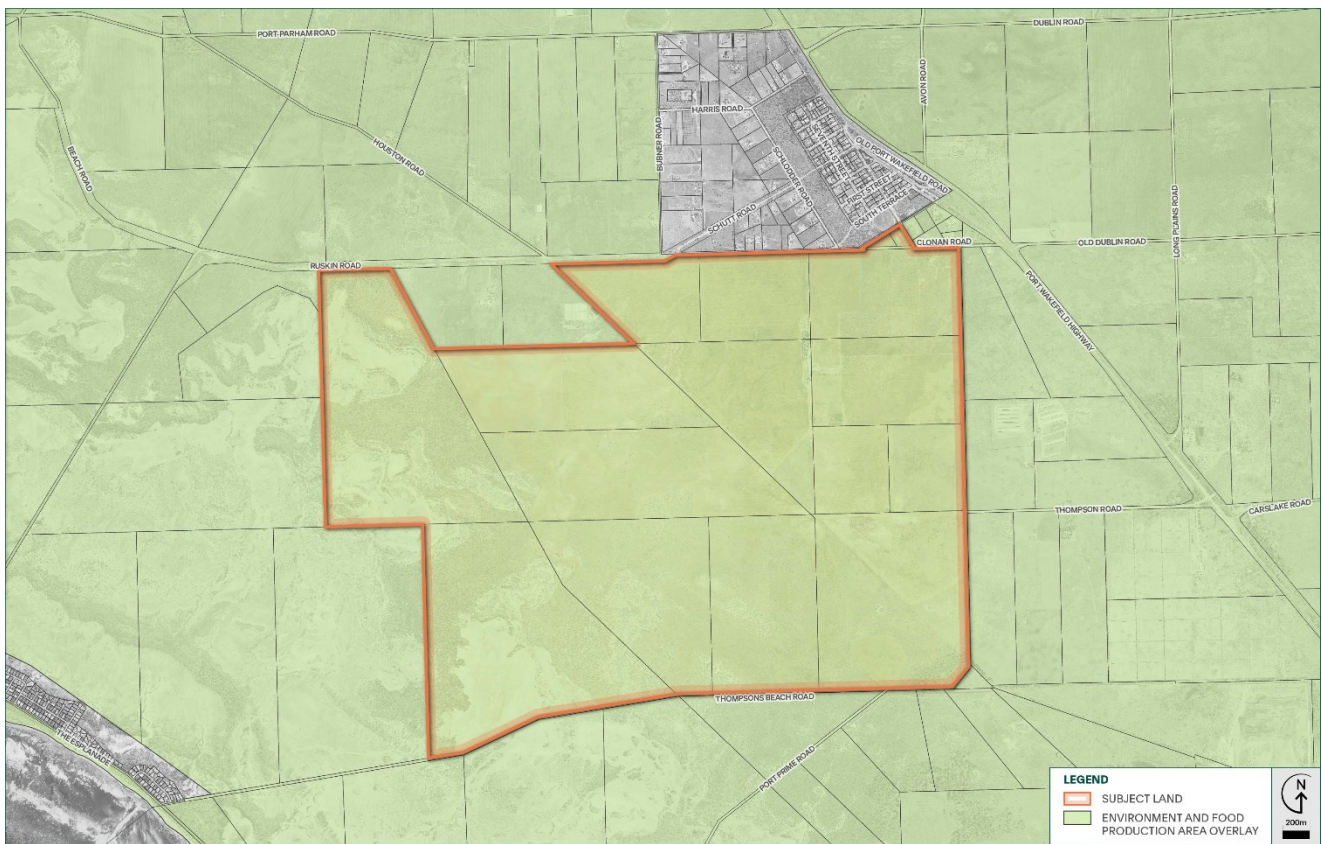


Figure 2.6 – EFPA Boundary (Source: SAPPa)

Consistent with the position of the Adelaide Plains Council, Leinad seek a small adjustment to the boundary of the EFPA (representing approximately 0.03% of the land currently located within the EFPA) to provide the opportunity for new housing to support the ongoing function and viability of the Dublin township (refer to **Section 5** below).

3. DUBLIN GREEN CIRCULAR ECONOMY PRECINCT

It is the vision of Leinad to develop 'Dublin Park' as a new master planned community and South Australia's first Green Circular Economy Precinct positioning Dublin Park at the forefront of sustainable residential and industrial development in Australia.

The circular economy is a system that prioritises the preservation of energy, labour, and materials by promoting reuse, remanufacturing, and recycling. In accordance with strategic directions of Council and Government, 'Dublin Park' will transform an underutilised site into South Australia's first green industrial, residential, and clean energy economy using sustainable technologies.

A diagrammatic flow chart of how the 'Dublin Green Circular Economy Precinct' will work and operate is illustrated in **Figure 3.1** below including the synergistic interrelationship between land uses and activities proposed within the master planned estate.

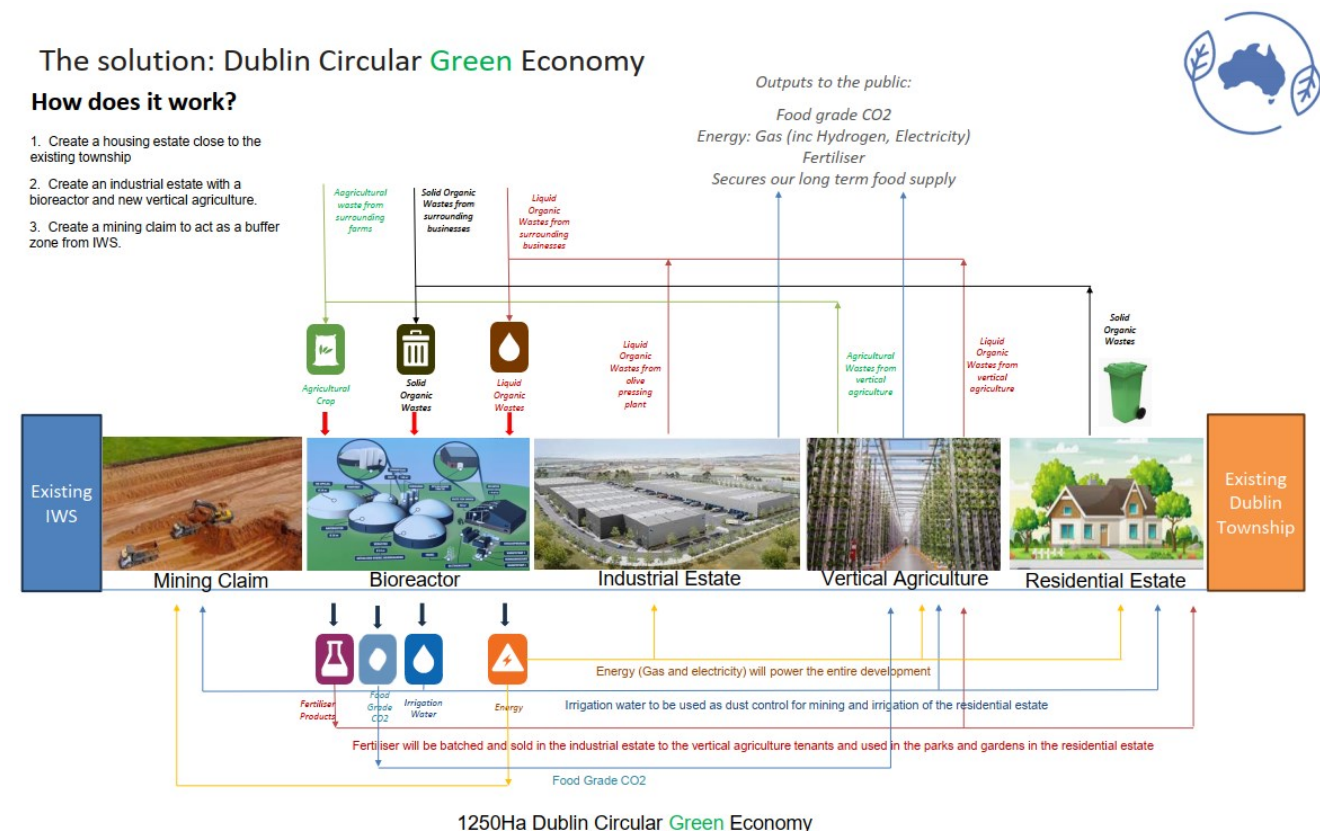


Figure 3.1 – The 'Dublin Green Circular Economy Precinct' (Source: Linead)

Key elements of the fully integrated 'Dublin Green Circular Economy Precinct' include:

- **A proposed 6.5MW Bioreactor** that would:
 - take organic waste product from local farms and businesses (including the opportunity to take solid organic wastes generated by the future residential estate) to create gas (including CO₂ and hydrogen) and electricity for the entire 'Dublin Green Circular Economy Precinct' including the future housing estate and employment related land uses;
 - generate fertiliser (byproduct) in the form of a compost equivalent soil conditioner and a liquid nutrient concentrate, which can also be utilised in proposed primary production activities on site or within the broad Adelaide Plains region (Note: the bioreactor would have the capacity to produce over 123,000t of soil conditioner and 37,000kL of concentrated liquid nutrient with an in-direct carbon benefit of approximately 7,000t CO₂);
 - generate CO₂ (food grade) which can be packaged and sold for use in the region and local food industry;
 - result in an opportunity for a hydrogen refuelling station near Pt Wakefield Road that can be established straight from the bioreactors hydrogen output; and
 - results in the opportunity to supply energy to other employment generating activities in the region;
- **A future residential community** that would:
 - have access to future employment opportunities within the proposed employment lands reducing trip generation, travel times, congestion, energy use and pollution;
 - have access to affordable, local sustainable and clean energy (electricity and gas) generated by the bioreactor with energy distribution via a dedicated micro grid which will create a competitive market where consumers costs of living is lower as a result of local sustainable energy generation and distribution;
 - have access to a clean potable water supply and efficient wastewater management with access to clean energy generated on site;
 - benefit from reduced upfront infrastructure costs associated with infrastructure augmentation as a result of localised generation and distribution of power and potable water;
- **Primary production** and 'vertical agriculture' activities that would:
 - be irrigated by treated wastewater generated from residential development;
 - result in wastes and byproducts from primary production activities (together with agricultural waste from the 'Northern Adelaide Plains Food Cluster') utilised to generate electricity within the bioreactor (green energy in the form of gas will be generated from the raw materials then converted to electricity, adopting carbon reduction);
 - benefit from a reduction of vectors and insects associated with green waste remaining in stock piles on farmland - where green waste product could be removed and used to fuel the bioreactor;
- **A mining tenement** that would:
 - generate resource that can be utilised for residential and commercial applications (both on and off site);
 - generate resource which can be utilised to created desired site levels for required falls across the balance of the 'Dublin Park' estate; and
 - utilise treated wastewater for dust suppression and control.

3.1.1. Urban Framework Plan

Since 2012, Leinad have been undertaking investigations into the site including its physical characteristics and surrounding locality, the environmental, social impacts, economic impacts of future township expansion as well as the policy implications to implement township growth.

These preliminary investigations have identified the following **benefits associated with township expansion** on the subject land:

- The subject land is a large, consolidated land holding allowing opportunity to develop and deliver a structured and master planned community that is not obstructed by fragmented ownership or control;
- The existing condition of the subject land is generally 'degraded' and it is considered to have low primary production value and potential;
- There is opportunity to provide for township expansion to support the growth and viability of the Dublin Township;
- 1,300 dwellings can be accommodated to support the expansion and viability of the Dublin township without the need for additional significant services and infrastructure (including reliance on existing transport infrastructure without the need for major upgrades to intersections with Port Wakefield Highway);
- Expert Land Economics advice from Deep End Services has identified a strong case for up to 400 hectares of land for large site area, low cost industrial land in the region. Deep End has advised that Dublin has attractive attributes for larger scale, low intensity uses aligned with the circular economy process and approach, the renewable energy sector, Defence and manufacturing as well as transport uses hauling long, wide or high freight using Port Wakefield Highway.
- Dublin can provide employment land to suit a range of employment uses and processes not suited to, or priced out of, the smaller and more expensive industrial sites in other locations. The Dublin employment land may differentiate itself from metropolitan industrial areas as it attracts uses requiring flexibility, mobility and even temporary facilities for operations to be scaled up and down as industry demand requires, as well as a permanent location for businesses seeking a competitive edge in entry pricing;
- The establishment of a mine will result in the opportunity to extract approximately 4.7M tonnes of resource from the site which can be backfilled with genuine Waste Derived Fill (WDF) in line with the 'SA Waste Strategy';
- The subject land is of sufficient size to provide for generous buffers to existing adjacent land uses and activities – this will protect the ongoing operation and existing use rights of these adjacent uses and enable the creation of a high-quality living environment for future residents. The employment areas within the subject site can also act as buffer separating future housing from existing EPA licenced activities - maximising the efficient use of land;
- The topography is suitable for urban development (noting that proposed mining operations on site could generate resource which can be utilised to create desired site levels for required falls and stormwater management);

- The land is largely unconstrained and free from topographical and environmental constraints, excluding existing vegetation adjacent the western boundary of the site within the existing 'Conservation Zone' which is proposed to be retained;
- There are no state or local heritage places on the land, or previously record Aboriginal Sites or Objects;
- Based on site history research, the risk of significant or gross soil and/or groundwater contamination across the whole site, that would be likely to preclude the use of the site for the proposed residential development, is considered to be low; and
- Whilst limited services currently exist, the site and township is likely to have adequate infrastructure capacity and/or augmentation capability to service and support an expanded township noting that limited township expansion of an additional 1,300 dwellings would not give rise to additional significant transport, social or community infrastructure in support of township growth and as a result of the localised generation and distribution of power and potable water.

Leinad have prepared an 'Urban Framework Plan' to deliver the Dublin Green Circular Economy Precinct, which have been informed by these preliminary background investigations. A Copy of the Urban Framework Plan is attached in **Appendix 2**.

The Urban Framework Plan includes a high-level spatial framework plan that is illustrated in **Figure 3.2**. This plan demonstrates proposed land use distribution, neighbourhood structure, key linkages and transport systems, major road connections, activity centres/nodes, open space and recreation facilities as well as overall employment and housing population/density.

Key features of the proposed Urban Framework Plan, include:

- The creation of a new master planned residential community (up to 1,300 dwellings) as a **contiguous logical expansion of the existing Dublin town centre** and ensuring the preservation of the commercial primacy of town centre with the ongoing and expanded delivery of services and activities to consolidate township function and viability;
- Location of mining activities (approx. 240 hectares) and employment land (up to 400 hectares) to act as buffer and provide the required separation distances from adjacent land uses – thereby enabling an efficient use of land, avoidance of any potential conflicts or limitations on the operation of existing adjacent land uses whilst providing a high quality living environment for future residents;
- Separation of internal road networks for future residential and commercial/industrial areas;
- Creation of buffers/green spines between housing and employment lands; and
- Generous buffer areas to the existing high value and environmentally significant coastal vegetation as well as the adjoining Winaityinaityi Pangkara (Adelaide International Bird Sanctuary).

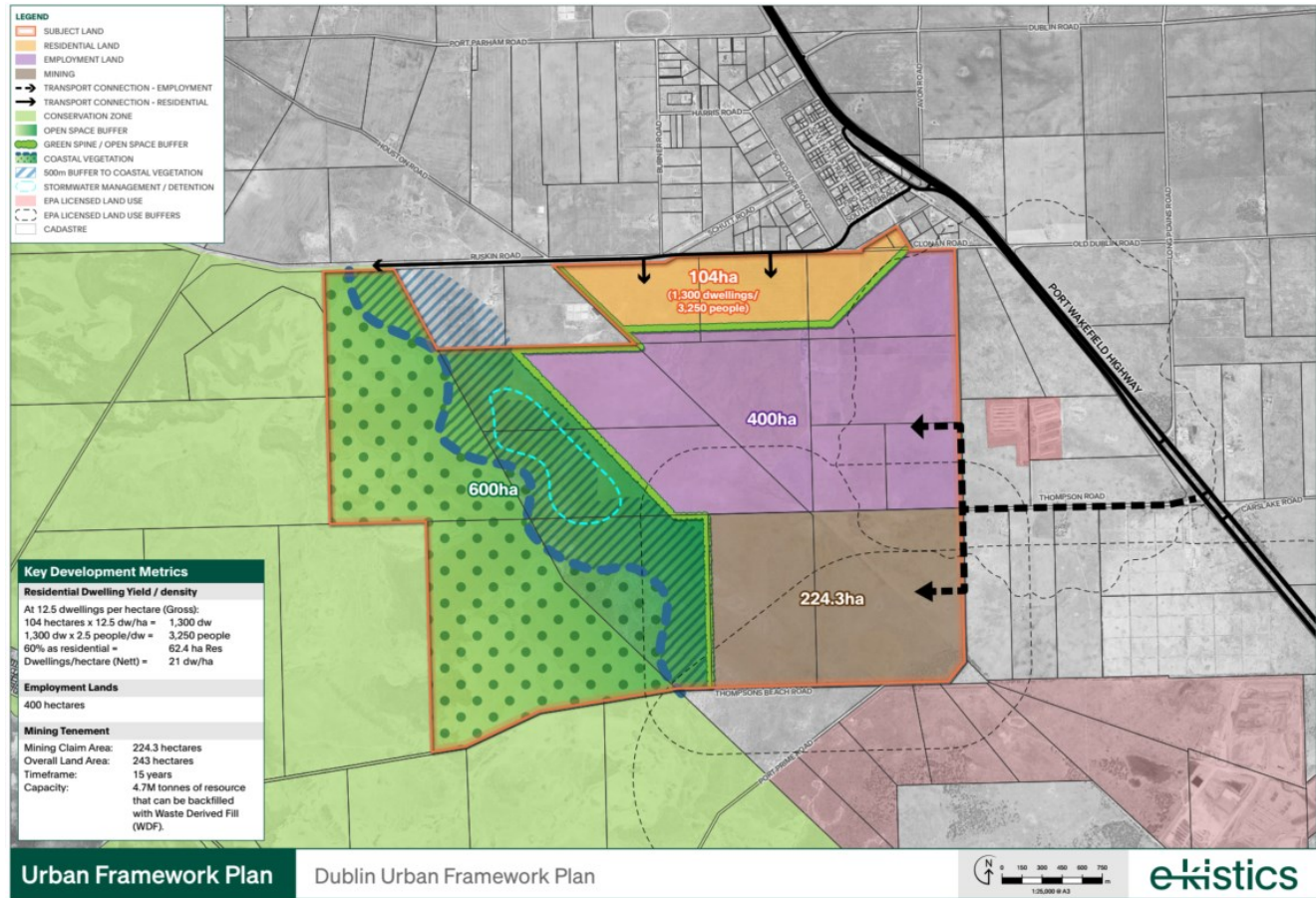


Figure 3.2 – Dublin Urban Framework Plan

4. STRATEGIC GROWTH OPPORTUNITY

The GARP ‘Discussion Paper’ identifies that the future Greater Adelaide Regional Plan “will set out for the long term how we sustainably bring land to market to meet our changing housing, employment and recreation needs. Identifying enough suitably zoned land will ensure we develop sustainably, which in turn, contributes to an inclusive, resilient and thriving region for our future generations.”

The Discussion Paper forecasts the need to supply 300,000 new homes to meet this projected population increase and identifies that there is a current capacity for an additional 200,000 homes (164,000 homes in land already zoned for residential development and a further 47,000 homes that could be accommodated on land already identified for future residential rezoning). The Discussion Paper identifies the need to therefore supply an additional 100,000 homes by 2051 or based on current estimates under a high growth scenario - we will run out of land for future residential development within 30 years unless an ongoing rezoning program is established.

The GARP ‘Discussion Paper’ is focussed around two core parts to help shape the future growth of Greater Adelaide as set out below:

4.1. How should Greater Adelaide grow?

The GARP ‘Discussion Paper’ identifies that the State Planning Commission (SPC) considers Greater Adelaide’s growth should be guided by the following four (4) outcomes, as illustrated in **Figure 4.1** below. The four outcomes have been derived from reference to the relevant State Planning Policies (SPPs) and the SPC’s research and investigations into how global trends may impact the region.

The Discussion Paper identifies that our future urban form should reflect the principles of ‘Living Locally’. Living Locally identified as being “about building sustainable, well connected, thriving neighbourhoods that meet the diverse needs of the people who live in them. It is about choice and flexibility, recognising people choose to live, work, play, and travel differently – and that those needs and preferences will continue to evolve.”

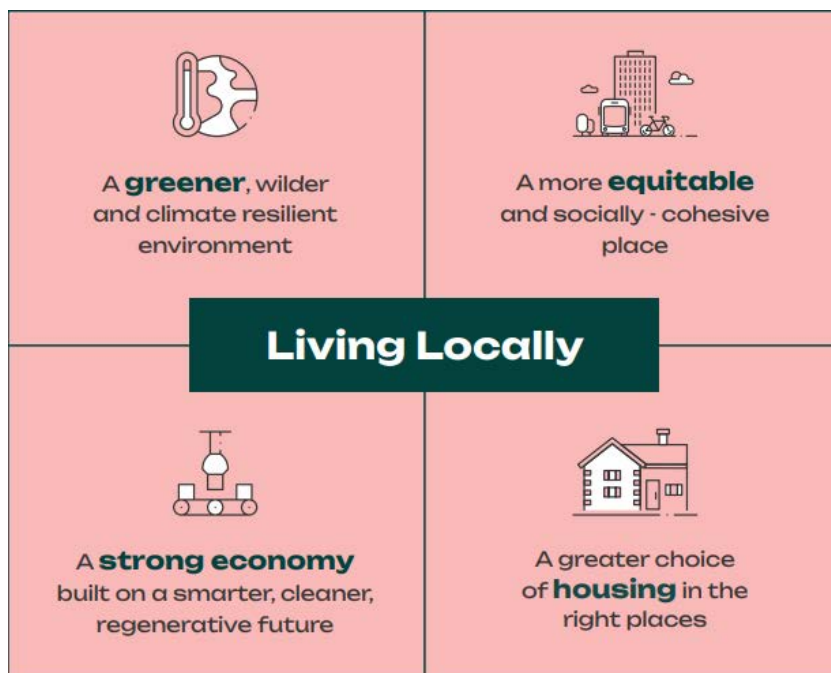






Figure 4.1 – Four Outcomes guiding Greater Adelaide’s growth

The detailed investigations and planning process undertaken by Leinad through the preparation of the Urban Framework Plan demonstrates the suitability of the subject land to support the ‘four outcomes to guide Greater Adelaide’s growth’ as outlined in **Table 4.1** below:

Table 4.1 – Four Outcomes to guide Greater Adelaide’s growth

Outcome	Response (Land Suitability)
 <p>A greener, wilder and climate resilient environment</p>	<ul style="list-style-type: none"> Leinad’s vision for South Australia’s first Green Circular Economy Precinct (as outlined in Section 3 above) demonstrates a commitment to creating a new development that is at the forefront of sustainable residential and industrial development in Australia. Leinad’s Urban Framework Plan demonstrates its responsiveness to the natural environment and hazards through the protection of the important adjacent Bird Sanctuary, Conservation Zone and important vegetation communities and biodiversity areas from future development. The future master planned community will include high quality open space for local residents and visitors that will provide opportunities to enhance connections and biodiversity links between the Bird Sanctuary and Conservation Zone. This reinforces the Adelaide Plains Council’s direction with respect to the preparation of ‘Dublin Township Growth and Tourism Master Plan’ based on this recognised opportunity to grow tourism experiences in the region.
 <p>A more equitable and socially - cohesive place</p>	<ul style="list-style-type: none"> Leinad’s vision will provide opportunity for local employment and housing in the one location. An increased population in Dublin, and within the region, supports greater opportunities for delivery of services and amenities to the local community including an enhancement to the function and economic vitality of the existing township.

Outcome	Response (Land Suitability)
 <p>A strong economy built on a smarter, cleaner, regenerative future</p>	<ul style="list-style-type: none"> Leinad's vision is consistent with the vision set out in the South Australian Economic Statement and in particular <i>Mission 1: 'Capitalise on the global green transition'</i> through the creation of the 'green circular economy' and the focus on providing employment lands (that are not able to be delivered within other locations within Greater Adelaide due to the costs of land and fragmented and smaller allotment sizes within existing employment precincts) to support the growth in the state's Defence, renewable energy and green industries. (refer to Section 4.2.2 below) and Figures 2.1 & 2.2 show the central location of Dublin in proximity to the wind, solar and hydrogen projects. This supports the Federal Government's commitment (introduced via legislation in 2022) for Australia to reach Net Zero emissions by 2050, and aim by 2030 to reach 43% below 2005 levels.
 <p>A greater choice of housing in the right places</p>	<ul style="list-style-type: none"> The proposal will contribute to realising the vision of Adelaide Plains Council Growth Strategy that has identified an opportunity for township expansion in Dublin on this land as part of the 'Three Town Service Model' and the expansion of Dublin's role as a Service Centre. Not only will there be a greater choice of housing types, new housing will be suitably located just 400m from the town centre of Dublin and within walking distance to extensive employment lands.

4.2. Where should Greater Adelaide grow?

The second part of the GARP ‘Discussion Paper’ explores where growth may be accommodated, including where housing growth should occur, where land should be set aside for jobs, where transport and infrastructure investment should be prioritised, and where valuable environmental and conservation assets should be preserved.

4.2.1. ‘North-Western’ spine?

The Discussion Paper has identified that housing growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. In respect to ‘Greenfield Development’, the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success.

The GARP ‘Discussion Paper’ identifies four (4) main greenfield ‘Investigation Areas’ on the fringe of Metropolitan Adelaide for future housing, with these areas being based on the State Planning Commission’s seven (7) identified land supply principles identified in the Paper. The areas proposed for detailed investigation extend from Adelaide’s four (4) major transport spines with the intent to capitalise on ongoing government investment along these growth corridors.

This includes a ‘**north-west spine**’ that begins at the south end of the Port Wakefield Highway stretching northwards from Buckland Park (including the Walker Riverlea development) to Two Wells as illustrated on **Figure 4.2** below.

Importantly, the GARP ‘Discussion Paper’ identifies the investigation areas along the north-west spine do not extend as far as the towns of Dublin and Mallala. However, the Paper does identify that for Dublin and Mallala that:

“These towns will keep their own separate identity but may expand locally to support township function and growth”
[our emphasis]

The GARP ‘Discussion Paper’ also states that it will ‘carefully plan and sequence growth and infrastructure to ensure timely access to services and amenities for new communities’ and will:

“Build on existing infrastructure capacity in townships, where local councils have identified growth opportunities. [our emphasis]

Figure 9 – Proposed areas of investigation
Greenfield and satellite city growth

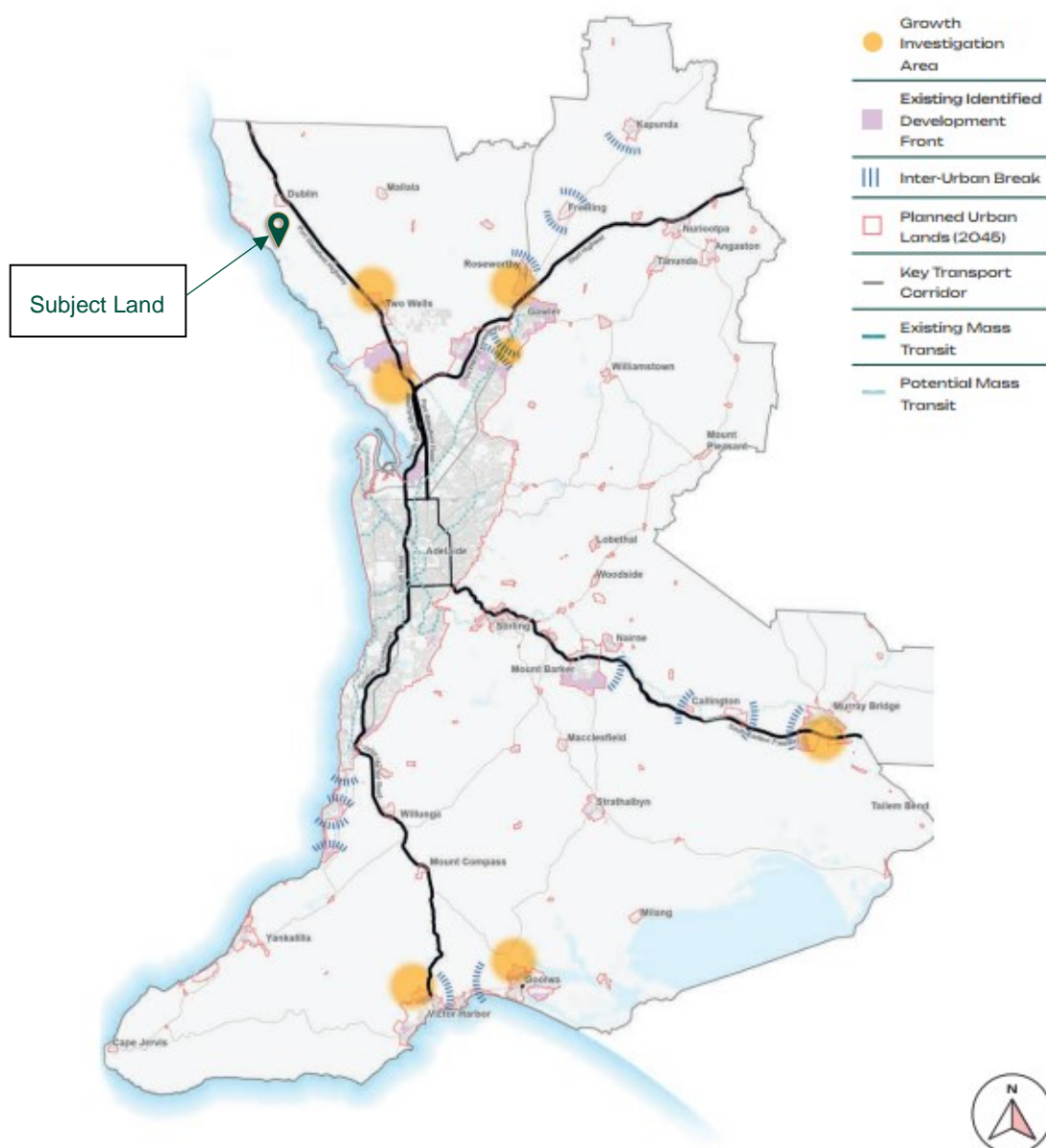


Figure 4.2 - Growth Investigation Areas

The Discussion Paper identifies a number of challenges to consider in respect to potential future residential/ employment growth along the 'north-western spine'. The subject land is well positioned to address these challenges for the following reasons (see **Table 4.2** below):

Table 4.2 – North-west spine challenges

Challenge (identified in the Discussion Paper, p119)	Response (Land Suitability)
<p>Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed.</p> <p>Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance.</p>	<p>The majority of the site located outside of the 'Conservation Zone' is described as highly degraded with a long history of clearance, grazing and cultivation. Further, the condition of the subject land is considered to have low primary production value and has not been used actively for food production for many years apart from low intensity grazing (refer to Section 5.3 below).</p> <p>Leinad's Urban Framework Plan (see Appendix 1) also protects the important coastal environment and high value vegetation communities on the western portion of the site, particularly within the existing 'Conservation Zone'.</p> <p>The Adelaide Plains Council supports, subject to further investigations, an expansion southward (into the subject land) for residential development to support the long-term viability of the Dublin township and expected population growth in the region.</p> <p>Residential growth combined with new employment growth will support principles of 'Living Locally' outlined in the Discussion Paper by providing opportunities for people to live, work and recreate within the local area.</p>
<p>The area is currently not supported by high frequency public transport and would require significant investment in trunk infrastructure to support urban growth.</p>	<p>The modest scale growth (up to 1,300 new dwellings and 3,250 people) will support the township function and viability but will not trigger significant investment in services and infrastructure (including the opportunity to rely on existing transport infrastructure without the need for major upgrades to intersections with Port Wakefield Highway).</p> <p>The circular economy model will generate on-site electricity and water, as described in Section 3, which will reduce infrastructure augmentation as a result of localised generation and distribution of power and potable water.</p>

Challenge (identified in the Discussion Paper, p119)	Response (Land Suitability)
It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency.	<p>Expert Advice from Deep End Services has identified a strong case for up to 400 hectares of Employment Land in the locality to provide suitable land for large scale, low intensity uses that are not suited to smaller and more expensive industrial sites in locations such as Edinburgh Parks.</p> <p>This is detailed further in Section 4.2.2 below.</p>
Hazards and environmental issue such as flooding would need to be considered and managed.	There are no significant flooding or other environmental issues that would prevent future development of the land.

4.2.2. Employment Lands

For Employment Lands, the Discussion Paper identifies that ‘the planning system plays a critical role in supporting the ambitions of the South Australian Economic Statement to deliver a smart, sustainable and inclusive future, by allocating enough land for current and future industries.’

The Discussion Plan identifies employment trends that will influence job types and future use requirements in Greater Adelaide, and identifies proposed areas of investigation for employment growth as illustrated on **Figure 4.3** below.

The Discussion Paper seeks feedback on what are the most important factors for the Commission to consider in meeting future demand for employment land. Based on the advice from Deep End Services (as outlined below), it is our opinion that Dublin is a suitable location to provide a type of employment land that may not be feasibly provided elsewhere in Greater Adelaide and is necessary to support the State’s goals around South Australia Economic to deliver a smart, sustainable and inclusive future.

Figure 15 – Proposed areas of investigation
Employment growth

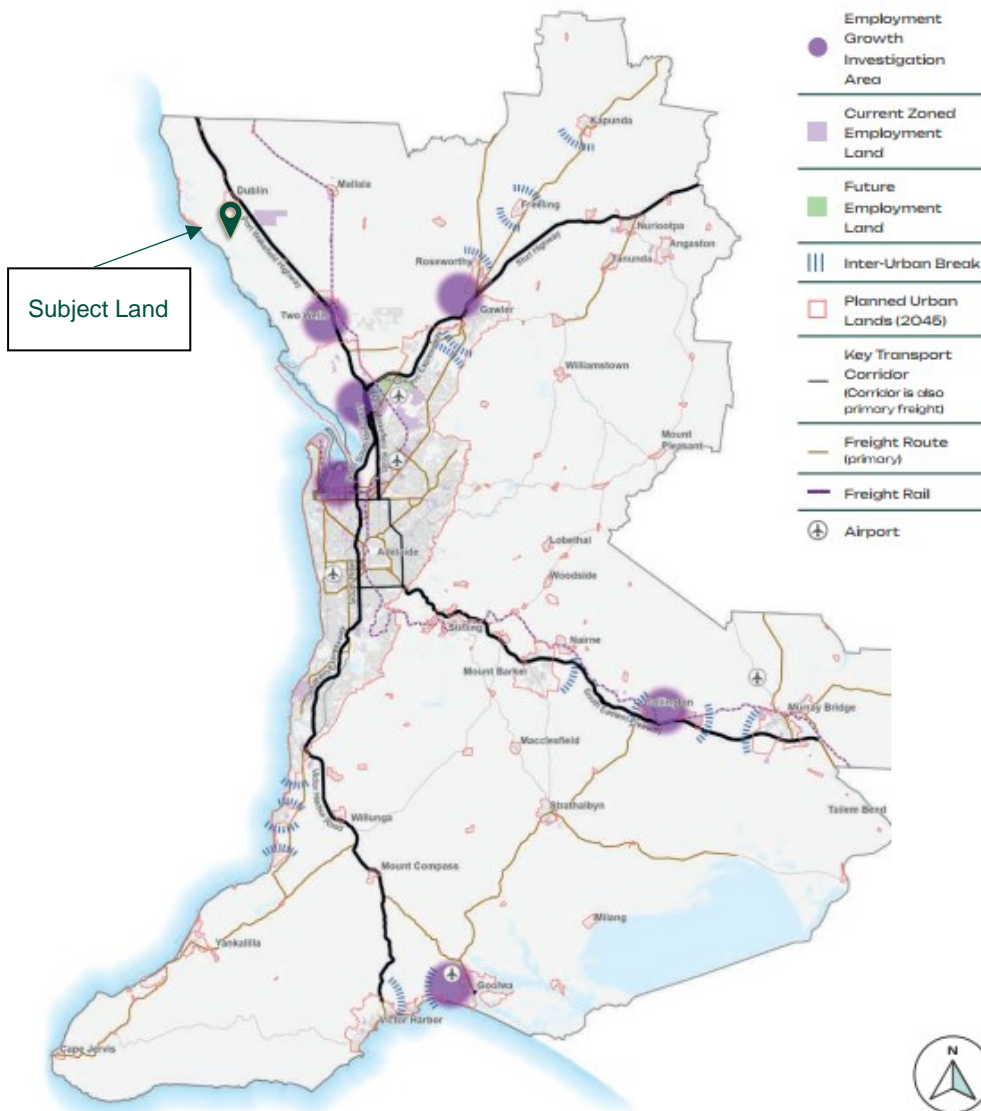


Figure 4.3 – Employment Growth Investigation Areas

Deep End Services have undertaken an analysis of the future demand for employment lands in the areas including identifying the key sectors where growth is anticipated in the region and an estimate of the likely area of land to be required for long-term development. This report is attached as an Appendix to the Urban Framework Plan.

Deep End Services have advised that there is a strong case for a significant proportion of the 1,450-hectare Dublin land holding to be designated for employment uses.

The land can accommodate a range of employment uses and processes not suited to, or priced out of, the smaller and more expensive industrial sites in Edinburgh Parks which are targeting more intensive manufacturing, food processing and warehouse and logistics operations.

Deep End Services' investigations have identified a mismatch between the current vacant land stocks (in the Outer North of Greater Adelaide) and the expressed interest by large land occupiers at Dublin. The investigations have identified 153 hectares of vacant zoned land comprises 93 parcels with an average of 1.6 hectares per lot. Importantly, only four (4) of the vacant parcels would meet the average size of 9.3 hectares identified for the potential tenants at Dublin Park and only two would satisfy the larger lot requirement of 12+ hectares.

Dublin has attractive attributes for larger scale, low intensity uses which can leverage:

- Location along Port Wakefield Highway access with short travel times back to the workforce and industrial support services of Outer North Adelaide;
- Access to nearby rail corridors with loading facilities;
- The growing regional population including projected growth in the Adelaide Plains local government area;
- Emerging interest in 'Green Circular Economy' projects and processes stimulated by South Australia's investment in renewable energy generation with ready regional sources of biomass and other inputs;
- Strong linkages to the agricultural sector of the Northern Plains, the renewable energy and infrastructure projects of regional South Australia (to the north & west) and to a lesser extent, Defence contracts and related work;
- Support from Adelaide Plains Council and their planning strategy based on a three towns service model including residential growth at Dublin; and
- More affordable and larger land parcels.

The sectors which appear to be well-suited to the site based on the location and expressed interest from occupiers are:

- The circular processes of a local green economy including innovative farming and food production methods, recycling industries, energy production from biomass, fertiliser harvesting and distribution and links or interdependencies with residential and industrial uses;
- Manufacturing, fabrication or logistics for the renewable (wind, solar and hydrogen) energy sector in metropolitan and regional SA;
- Defence and infrastructure contractors or sub-contractors requiring more land extensive sites; and
- Manufacturing or transport uses hauling long, wide or high freight to destinations using Port Wakefield Highway.

The Dublin employment land may differentiate itself from metropolitan industrial areas as it attracts uses requiring flexibility, mobility and even temporary facilities for operations to be scaled up and down as industry demand requires, as well as a permanent location for businesses seeking a competitive edge in entry pricing.

Deen End have confirmed that there is no model-driven formula at this stage for the calculation of industrial land needs for a per-urban location such as Dublin. Notwithstanding, based on the expressions of interest already received for employment land on the site, the larger land area requirements for emerging industries, existing Strategic Employment land reserves to the east, the long term nature of the estate and the need for an area to develop a critical mass and provide a range of land options, Deen End have confirmed that up to **400 hectares of employment land** can be planned for on this site.

5. SUITABILITY OF THE SUBJECT LAND FOR FUTURE DEVELOPMENT

5.1. Modest Township Growth Supported by Existing Infrastructure

As stated in Section 4.2.1 above, in relation to the north-western spine growth investigation area, the GARP Discussion Paper states (p. 118) that:

“The investigation areas do not extend as far as the towns of Dublin and Mallala. These towns will keep their own separate identity but may expand locally to support township function and viability.”
[our emphasis]

The Adelaide Plains Council Growth Strategy and Action Plan and submission on the GARP’ (see **Section 2.2** above) support growth at Dublin.

In our opinion the investigations undertaken by Leinad, including the preparation of the Urban Framework Plan, demonstrate that a modest amount of new housing (up to 1,300 dwellings and 3,250 people) will provide opportunities for additional local services and facilities that will enhance the viability and function of the township will not give rise to additional significant transport, social or community infrastructure beyond existing capacity.

With respect to transport infrastructure, traffic analysis has been undertaken by MFY Traffic Engineers (forming an Appendix to the Urban Framework Plan) in respect to the prospective development of the site including SIDRA intersection modelling and liaison with the Department for Infrastructure and Transport. Based on this analysis, MFY have confirmed that the implementation of the proposed development and vision for Leinad will not result in significant investment in transport infrastructure. In particular, MFY have confirmed that:

A review of the volumes at the existing southern intersection of Port Wakefield Road and the Dublin service road (Sanders Avenue) identified that the subject land could accommodate 1,300 dwellings (up to a design year of 2040). Given that the current future road design year is 2041, it is reasonable to suggest that there would be no road works required at the intersection for this growth. The current channelised left and right turn lanes comply with Austroads

criteria for 110km/h at this intersection. The intersection does not currently include acceleration lanes and the additional northbound traffic associated with the dwellings will not change the functionality of the existing turning movement at this intersection.

The balance of the subject land is identified for a potential mining tenement and employment (industrial) areas. These land uses should be accessed via Thompson Road to minimise any impact on the Dublin township created by large vehicles. The Thompson Road/Port Wakefield Highway intersection has been designed to cater for large commercial vehicles and currently provides access to and from the existing chicken farm.

Additional volumes generated by development in the employment and mining area will be dependent on the ultimate land use. As an example, however, the potential mining tenement is forecast to generate in the order of 20 trips a day which is very low and would have a negligible impact on the operation of the intersection. Further, the existing low volumes at the intersection are low and there is therefore significant spare capacity. Accordingly, while each land use application would be subject to a separate assessment, there is potential for the intersection to cater for the envisaged development

Preliminary investigations have also found that an additional population of 3,250 people (i.e. 1,300 dwellings with 2.5 persons per household) within the township of Dublin is unlikely to result in the need for:

- An additional primary school or high school;
- A public hospital facility in its own right;
- Community health facilities (potential for an outreach service in Dublin, with base likely in Two Wells);
- A library branch;
- A dedicated community centre;
- A dedicated police station;
- An ambulance station;
- A CFS Station (in addition to the existing CFS unit based in Dublin);
- An SES unit; or
- New sporting and recreational facilities within the current level of facility provision considered reasonably good (noting that however a playground could be added to the existing oval and court complex)

Notwithstanding, the population increase will likely create demand for local GPs and other medical practitioners, and possibly a child care centre. These services would be likely to be provided by the private sector on a commercial basis and could be located within the existing town centre or a local centre.

5.2. Capitalising on the Global Green Transition

The adoption of circular economy principles and provision of critical new employment lands to enable local construction is strongly aligned with the South Australian Economic Statement released by the State Government that sets out its ambitions for the South Australian economy and the goal to foster a green transformation of the economy and support the continued investment in renewable energy generation.

5.3. Environment & Food Production

An independent Ecology Assessment undertaken by EBS Ecology in June 2012 on behalf of Leinad (forming an Appendix to the Urban Framework Plan) identified that land within the 'Conservation Zone' (previously Coastal Zone) is considered to be of high to very high conservation value with the majority of the site located outside of the 'Conservation Zone' described as highly degraded through a long history of clearance, grazing and cultivation.

Importantly, **the subject land is not identified as a 'Primary Production Priority Area' (PPPA)** by PIRSA, with the majority of the site located within a 'Non-Primary Production priority Area' (comprising that part of the subject land within the 'Rural Zone') or an 'Excluded Area' (comprising that part of the subject land within the 'Conservation Zone') (refer to **Figure 5.1** below).

Developed by Primary Industries of South Australia (PIRSA), PPPA's have been identified in response to Planning Strategy directives including the '30 Year Plan for Greater Adelaide' to identify '*areas of primary production significance*' (30 Year Plan for Greater Adelaide', 2010, P. 106).

PPPA's have been identified with reference to a variety of factors including "land capability, industry investment and land use, access to water, climatic considerations (including anticipated climate change) and any local conditions that give rural land special significance for primary production" (Location SA, 2010).

Pursuant to Section 7 of the Planning Development and Infrastructure Act 2016 the purpose of the EFPA is to 'ensure that areas of rural, landscape, environmental or food production significance within Greater Adelaide are protected from urban encroachment.

The modest expansion of the Dublin township south within the existing 'Rural Zone' and concomitant adjustment to the EFPA boundary to accommodate an additional 1,300 dwellings (3,250 people) would not be contrary to the stated purpose of Section 7 of the PDI Act with respect to the protection of land for environmental or food production significance given:

- The recognised degraded condition and the low primary production value of the land within the existing 'Rural Zone' (identified by PIRSA as a 'non-primary production area'); and
- The retention of existing vegetation, including establishment of generous landscape buffers, to vegetation of high to very high conservation value within that portion of the site located within the 'Conservation Zone'.

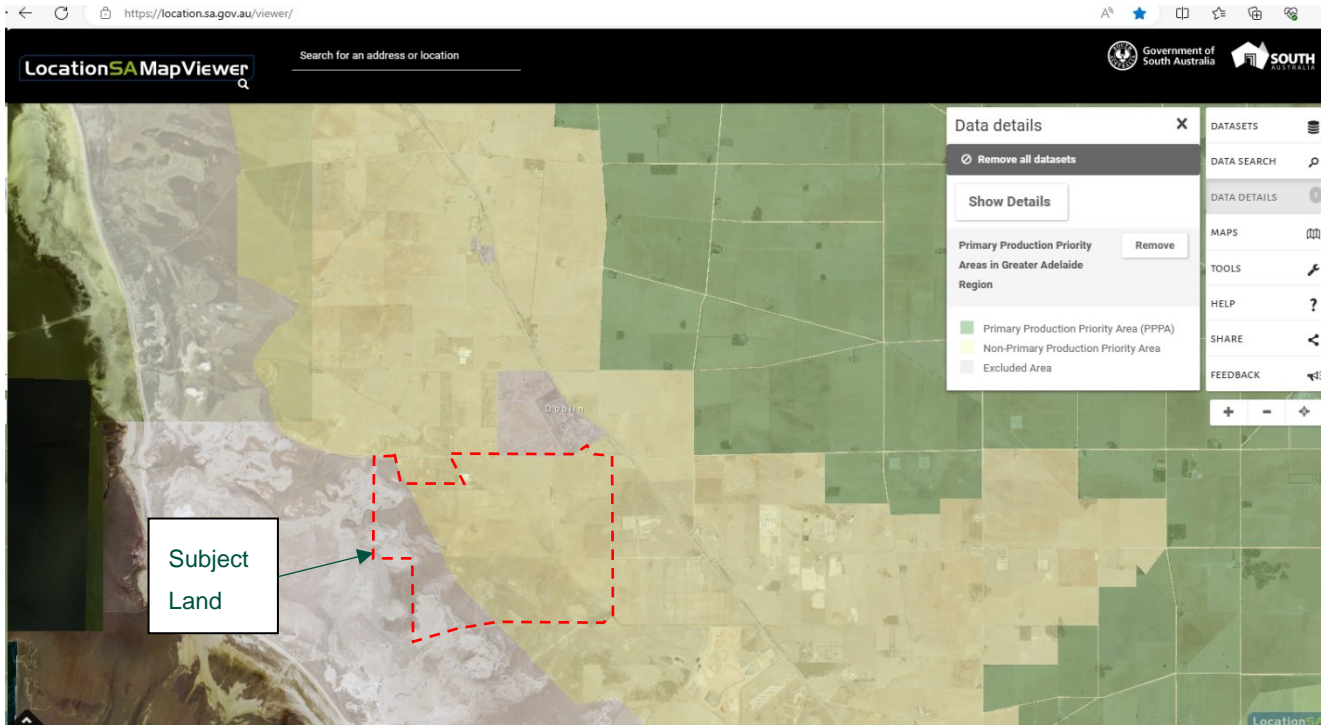


Figure 5.1 – Primary and Non-Primary Production Areas (Source: Location SA)

Further, Leinad’s vision will ensure future development provides generous separation to the adjacent Winaityinaityi Pangkara ‘Adelaide International Bird Sanctuary’. The Framework Plan has identified an opportunity to create new open space walking and cycling connections and linkages through to Winaityinaityi Pangkara which will assist to support tourism opportunities associated with the National Park.

5.4. Cultural Heritage

An analysis of likely Aboriginal heritage was undertaken by ‘Australian Cultural Heritage Management’ (ACHM) in 2012 and forms an Appendix to the Urban Framework Plan. This included a review of the ‘Central Archive’ and the ‘Register of Aboriginal Sites and Objects’, the ‘South Australian Museum Collection Database’, and the consultant’s own corporate archives.

The study also reviewed Aboriginal cultural heritage report and literature relating to mythologies and oral histories. The review work identified that the land is within the Kaurna Native Title Claim area but that no specific Aboriginal Cultural Heritage sites have been identified on the subject land.

In 2023, this research has been supplemented by updated research as part of the preparation of the program for environment protection and rehabilitation (PEPR) for the mining tenement. The new research has reached the same findings.

Notwithstanding that there are no known sites, the area is identified as one of historic activity for the Kaurna People and therefore artefacts scatters, campsites and human remains may be encountered. Aboriginal heritage sites have a high

degree of association with water features and thus the Samphire Coast area and the coastal dunes would provide the most likely areas for finds.

It is recognised that all Aboriginal artefacts, sites, or remains are protected under the Aboriginal Heritage Act 1998.

5.5. Propensity for Development

The land is under the single ownership and control of Leinad who have been undertaking investigations on the opportunities for this land since 2013 and are well positioned to proceed with development of the land in the short term.

Leinad strongly support:

- Identification of land as a future housing and employment growth area in the Greater Adelaide Regional Plan (GARP);
- Review of the Environment and Food Protection Area (EFPA) boundary to allow for limited growth for the expansion of the Dublin Township;
- Code Amendment/s to rezone the land for its intended purposes; and
- Agreements for the delivery of necessary infrastructure and services.

With a strong case for demand for employment land, an approved mining claim (that is in the process of establishment before on-site works begin) and alignment with the Adelaide Plains Council Growth Strategy, the subject site therefore has a strong propensity for future development and delivery of employment and housing land to the market.

6. CONCLUSION

This submission has been prepared, on behalf of Leinad who own excess of 1,373 hectares of land to the immediate south of the existing Dublin Township, to inform the preparation of the next Regional Plan for Greater Adelaide.

Leinad have undertaken significant investigations and prepared an Urban Framework Plan to guide future development opportunities for the land.

In our opinion, the investigations undertaken provide a strong case for identification of the land to the south of Dublin for future employment and modest housing growth, that satisfies the thresholds to expand locally without creating new unplanned infrastructure demands. The land is well located to support not only projected growth in the region, but also has attractive attributes to provide employment land targeted at the specific needs and requirements of the renewable energy, green economy, hydrogen and Defence sectors which have been identified by the State Government as a priority to ensure the State's economy is competitive across the world by creating industries that are sustainable and powered by renewable energy.

We seek the Commission's support for the identification of the land in the Greater Adelaide Regional Plan and support to immediately commence the necessary Code Amendments to implement Leinad's vision for this strategic land holding.

Please do not hesitate to contact the undersigned on [REDACTED] should you require any clarification or additional information in support of this submission .

Yours Sincerely,



Rick Hutchins

Associate

CC: Leinad Land Developments (Dublin) Pty Ltd

Chief Executive Officer, Adelaide Plains Council

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APPENDIX 1

Correspondence from Adelaide Plains Council



D19/50832

24 October 2019

Mr Daniel Palumbo
Leinad Land Developments (Dublin) Pty Ltd
55 Stanbel Road
SALISBURY PLAINS SA 5109

Dear Mr Palumbo,

Dublin Township Expansion – Leinad Land Developments

As you are aware, *Environment and Food Production Areas (EFPAs)* were introduced through the *Planning, Development and Infrastructure (PDI) Act 2016* to prohibit the further subdivision of land for housing to protect vital food and agricultural lands. The majority of the Adelaide Plains Council area is located within an EFPA and the effect of this legislation is to restrict land divisions for residential development to Council's main townships (Two Wells, Mallala and Dublin) and a number of other existing settlements only.

The potential expansion of the Dublin township was previously supported by Council back in 2014, when Leinad Land Developments proposed a developer-led Development Plan Amendment (DPA) to rezone land to the south of Dublin for residential purposes. Council endorsed the DPA together with a Funding Deed to finance the DPA. However, the DPA Statement of Intent (SOI) was rejected by the then Minister for Planning, the Hon. John Rau, on 20 February 2015 as the proposals were not considered to be in accordance with the State Planning Strategy at that time.

The DPA was intrinsically linked to a proposal for the construction of a local shopping centre at Dublin comprising 1700 square metres of gross floor area, including a small supermarket and five speciality shops. Development Plan Consent was granted for the shopping centre on 12 November 2015 and the operative period of this Development Plan Consent remains 'live' until 4 August 2020.

Since the granting of the Development Plan Consent and the rejection of the DPA, the introduction of the EFPA legislation through the 2016 PDI Act has prevented any further progress on the development proposals from occurring.

Following a presentation by planning consultant Richard Dwyer of Ekistics to Council Members on behalf of Leinad Land Development on 8 July 2019, a Motion on Notice was made at the Ordinary Council Meeting on 22 July 2019, which resulted in the following resolution:-

Environment Food Production Areas

Moved Councillor Keen

Seconded Councillor Lush

2019/323

“that the Chief Executive Officer formally write to the Department of Planning, Transport and Infrastructure and the Minister for Planning to give advanced notice of Adelaide Plains Council’s desire to have strategic holdings reviewed throughout the Council area as part of the imminent Environment Food Production Areas review process.”

CARRIED

As per the above resolution, I wrote to the Hon. Stephen Knoll MP, Minister for Transport, Infrastructure and Local Government on 23 July 2019. To date, no reply has been received.

Following formal requests by both Leinad Land Developments, as well as the Hicks Group regarding a potential development at Two Wells, Council at its Ordinary Meeting on 23 September 2019, resolved as follows:-

Item 21.5: Environment and Food Production Areas

Moved

Councillor Maiolo

Seconded

Councillor Lush

2019/412

“that Council, having considered Item 21.5 – Environment and Food Production Areas, dated 23 September 2019, receives and notes the report and in doing so authorises the Chief Executive Officer to:-

- 1) progress the review of relevant strategic holdings that are currently impacted by the Environment and Food Production Areas legislation with the Department of Planning, Transport and Infrastructure and the State Planning Commission as part of the 5 yearly review of the Planning, Development and Infrastructure Act 2016 (Section 7).*
- 2) provide in-principle letters of support to Leinad Land Developments (Dublin) Pty Ltd and the Hicks Group to enable both parties to advocate for boundary changes to the Environment and Food Production Areas and allow the future progression of long term rezoning objectives as outlined in Attachments 1 and 2 to this Report.”*

CARRIED UNANIMOUSLY

As per Council Resolutions 2019/323 and 2019/412 above, Adelaide Plains Council is pleased to provide in-principle support to Leinad Land Developments to advocate for boundary changes to the EFPA to allow for the future progression of long term rezoning objectives for the expansion of the Dublin township.

If you require any further information, please contact Rob Veitch, General Manager Development and Community on [REDACTED]

Yours sincerely

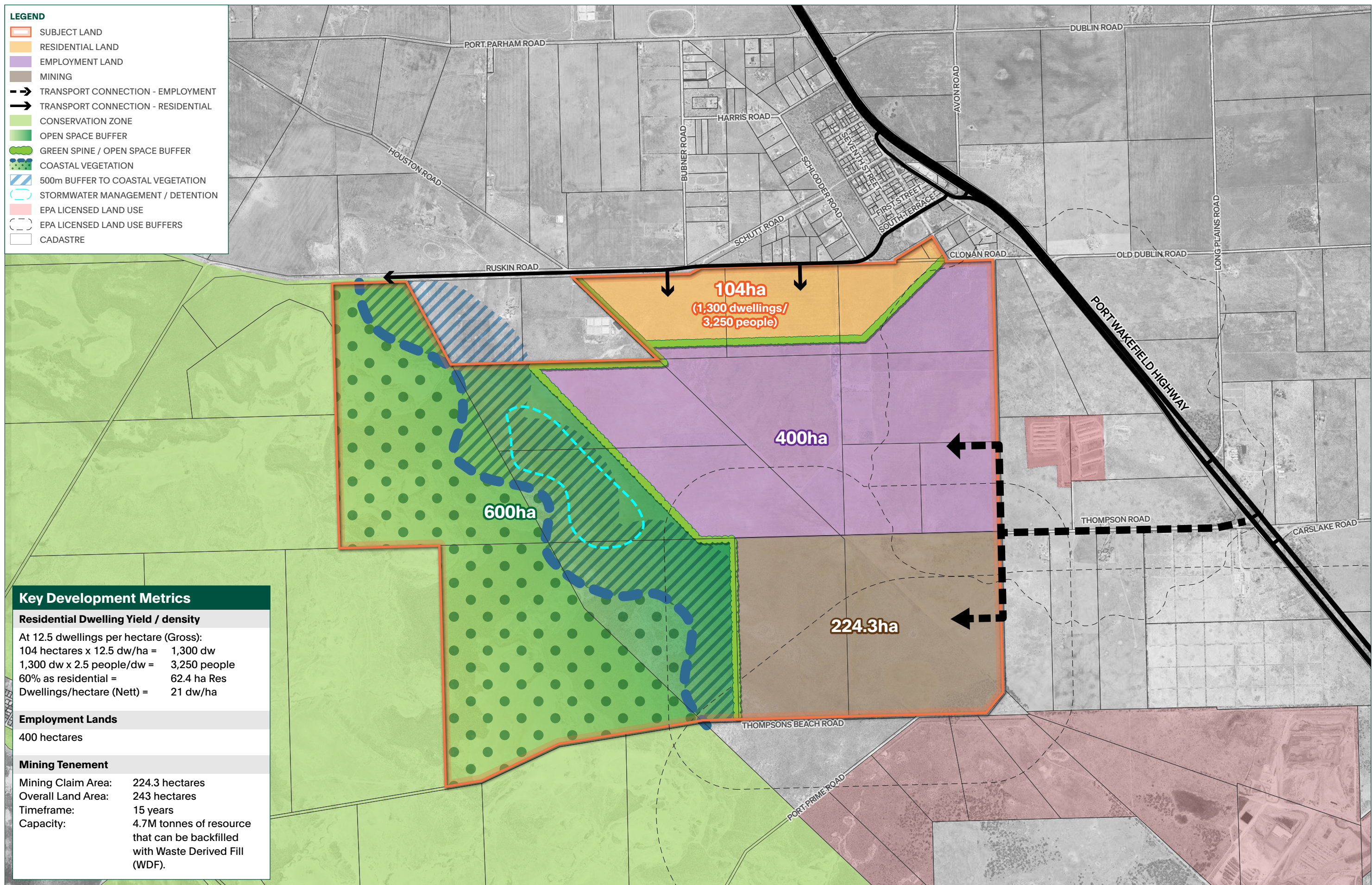
A handwritten signature in blue ink, appearing to be 'James Miller', with a stylized, flowing script.

James Miller
Chief Executive Officer



APPENDIX 2

Framework Plan



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Public feedback form

Submit feedback on the Greater Adelaide Regional Plan Discussion Paper

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Submit feedback on the Greater Adelaide Regional Plan Discussion Paper.

Use this form to submit feedback to "Planning and Land Use Services" regarding the [Greater Adelaide Regional Plan Discussion Paper](#).

Submissions close on Monday, 6 November 2023.

Amendment * (required)

Greater Adelaide Regional Plan Discussion Paper ▼

Customer type * (required)

Member of the public ▼

Given name * (required)

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Family name * (required)

AU

Organisation

Email address * (required)

Phone number * (required)

Enter a 10 or 8 digit phone number. For example: 0412345678 or 0212345678

Comments * (required)

max 2000 characters

Comments* (required)

Max. 2000 characters.

I want to divide my land into 1,000 sq.

~~1000~~



Kudla S.A. 5715.



DTI:PlanSA Submissions

From: Chris Engert [REDACTED]
Sent: Monday, 6 November 2023 10:53 AM
To: DTI:PlanSA Submissions
Subject: MAB Corporation Submission
Attachments: 231103 - Letter to Department for Trade and Investment.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Please see attached MAB's submission to the Greater Adelaide Regional Plan.

Regards

Chris Engert
Director Planning



MAB Corporation Pty Ltd



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MAB Corporation Pty Ltd

ABN 78 917 049 883

ACN 065 207 230

23 Currie Street

ADELAIDE SA 5000

6 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
ADELAIDE SA 5001

plansasubmissions@sa.gov.au

Dear Sir/Madam

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Brompton Gas Works Site

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan (GARP) Discussion Paper. MAB welcomes the opportunity to contribute to such an important plan for South Australia.

MAB suggests that the Brompton Gas Works site (the Site) be identified as a *Strategic Infill Site* within the GARP with a strong focus on liveability, capitalising on access to existing services and facilities and reduced car dependency – emphasising its potential to play a key role in contributing to land supply for Greater Adelaide over next 10 years.

In 2022, MAB executed a Development Agreement with Renewal SA for the redevelopment of the 5.8 hectare Site and included master plan and vision to create “*a vibrant urban village that celebrates its historical identity and blends sustainability and community into a smarter way to live through a design response that supports a medium density, mixed-use village*”. Remediation works commenced in July 2023 and our first residents are expected to arrive towards the end of 2025.

Affected Area and Metropolitan Context

The Site comprises multiple titles bound by Chief Street, Drayton Street and Second Street, in Brompton (refer to Figure 1) and has a range of strategic locational advantages:

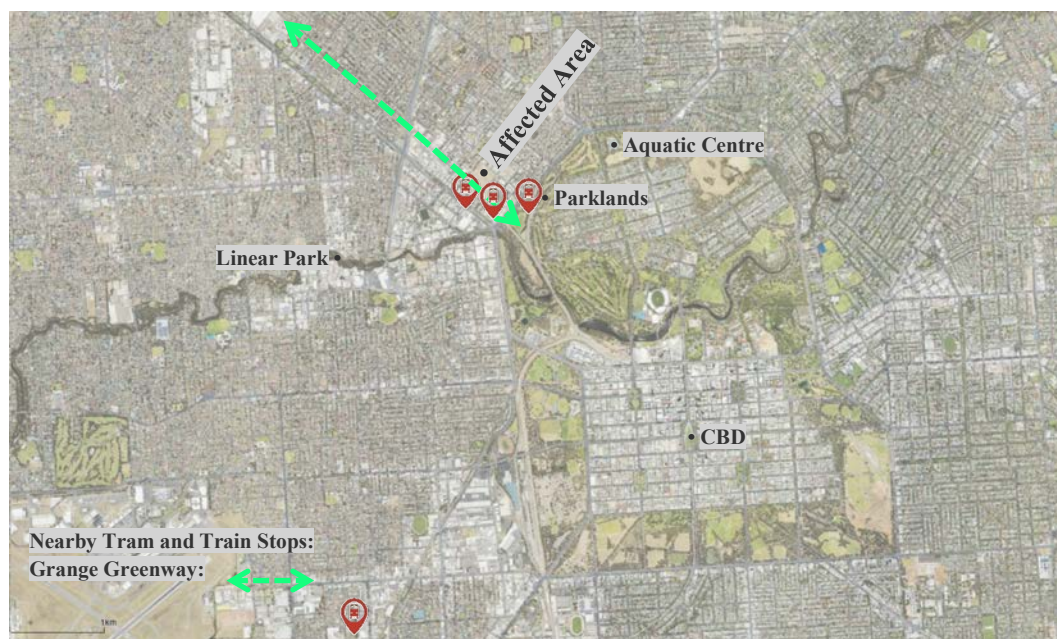
- It is situated 2.5 kilometres (approx.) from the Adelaide Central Business District (North Terrace) as highlighted in Figure 2;
- It is 500 metres (approx.) from the Adelaide Park Lands which offers local and regional-scale recreation and relaxation areas;
- It is immediately adjacent to Bowden Railway Station which services the Outer Harbour and Grange to City Railway lines. It is also proximate to the North Adelaide Railway Station which services the Gawler Central to City line, as well as the Port Road Tram Stop;
- It is immediately adjacent the Grange Greenway cycling and walking route; and

- The proposed medium and high-density urban form will encourage greater use of active transport options such as walking, cycling and public transport.

Figure 1: Affected Area



Figure 2: Metropolitan Context



Development of the Affected Area also aligns with the planning objectives of the:

- 30-Year Plan for Greater Adelaide, which identifies Bowden/Brompton as providing an opportunity for transformational change;
- City of Charles Sturt Open Space Strategy 2025;
- Bowden Master Plan 2016;
- Bowden Developers Handbook & Urban Design Guidelines 2016; and
- Brompton Gasworks Master Plan.

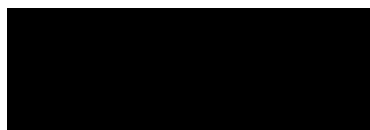
MAB supports the intent of the GARP and request that it clearly recognises the significance of the Site as a unique opportunity to accommodate high-rise and high-density urban development.

Importantly, the Site represents an opportunity to capitalise on the excellent active and public transport modes available in the location further highlighting the opportunity for residents and visitors to access alternative transport modes. The GARP should acknowledge that the development of the Site can be a model of how reliance on cars can be reduced.

We will continue to work with the Commission, state agencies and the City of Charles Sturt to ensure the high-quality and coordinated development of the Site, while also achieving several positive housing and community outcomes.

Please contact the undersigned on [REDACTED] or [REDACTED].

Yours sincerely



Chris Engert
Director Planning

3 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

**RE: Submission on the Greater Adelaide Regional Plan Discussion Paper – Opportunity for Future Urban Growth –
36-38 Krieg Road, Gawler Belt & 53 Krieg Road, Kangaroo Flat.**

1. EXECUTIVE SUMMARY

This submission seeks inclusion of land at 36-38 Krieg Road, Gawler Belt and 53 Krieg Road, Kangaroo Flat as a future urban growth area in the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years).

2. INTRODUCTION

We act for The Macladan Investments Trust ['Macladan'] who own and control a 31.8 hectare area of land at 36-38 Krieg Road, Gawler Belt and Neville Krieg ['Krieg'] who owns and controls a 61 hectare area of land at 53 Krieg Road, Kangaroo Flat, jointly referred to as the 'Subject Land' within this submission, all parcels of land are located within Light Regional Council.

The subject land is located within an area that has been identified as a 'Growth Investigation Area' with the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper').

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Regional Plan for Greater Adelaide and seeking wide input to inform the setting of the strategic direction on how and where Greater Adelaide should grow.

This submission, prepared on behalf of Macladan and Krieg, is provided to support identification of the area to the south of Roseworthy as a future urban growth area in the next Regional Plan for Greater Adelaide.

As set out in the submission below, the subject land is highly suitable for urban expansion based on its ownership arrangements and limited constraints and is well positioned to be developed to meet the urban growth needs for Greater Adelaide.

3. THE SUBJECT LAND

3.1. Land Description / Identification

The subject land comprises the following four (4 Certificates of Title, as listed below and as illustrated in **Figure 3.1**:

- 36 Krieg Road, Gawler Belt – Certificate of Title Volume 5104 Folio 53 (Allotment 1 in Filed Plan 14210);
- 38 Krieg Road, Gawler Belt – Certificate of Title Volume 5163 Folio 192 (Allotment 2 in Filed Plan 14210);
- 53 Krieg Road, Kangaroo Flat – Certificate of Title Volume 5497 Folio 413 (Allotment 1 in Filed Plan 4702); and
- 53 Krieg Road, Kangaroo Flat – Certificate of Title Volume 5498 Folio 980 (Allotment 2 in Filed Plan 4702).

The Subject Land has an approximate area of 93 hectares with approximate frontages of 1 kilometre to Redbanks Road, and 1.2 kilometres to the western side of Krieg Road and 590 metres to eastern side of Krieg Road (refer to **Figure 3.1**). Krieg Road is an unsealed road that bisects the subject land. The subject land is generally flat with slight undulations and is currently used for agricultural farming purposes.

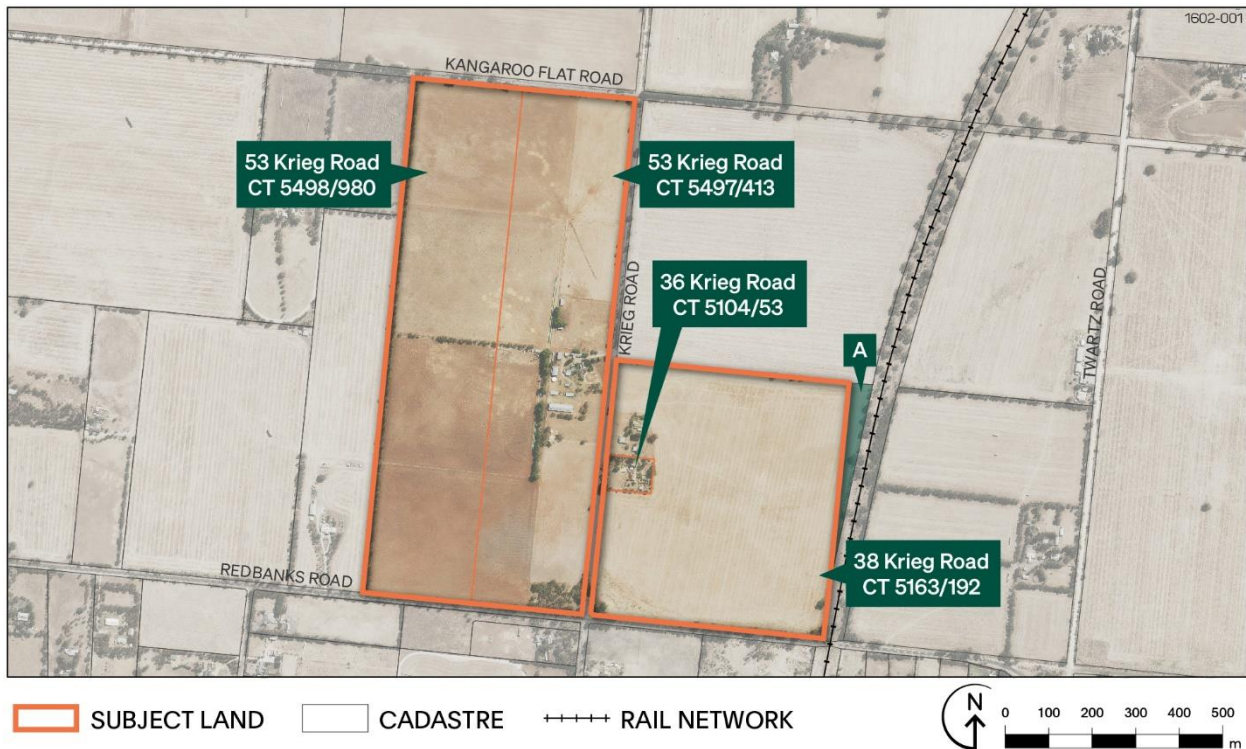


Figure 3-1 Subject Site (Source: SAPPA)

We note that the narrow triangular shaped land parcel, as Marked A on **Figure 3.1**, between the eastern portion of the subject land and the former rail corridor is owned by the Minister for Transport, Infrastructure and Local Government. This land is currently used informally as part of the farming use that occurs over the subject land (36-38 Krieg Road), and other than access via the rail corridor this land is effectively 'landlocked'. There do not appear to be any rights of way, easements or agreements on the land title associated with this land. We have not investigated the potential future use of this land as part of this submission including its potential identification as a future urban growth area for Greater Adelaide. Notwithstanding, we assume that should the subject land be identified as a future growth area in the Greater Adelaide Regional Plan, that this smaller irregular land parcel would also arguably represent a logical inclusion within the Regional Plan as a potential future urban growth area.

3.2. The Locality

The subject land is located at the south-western end of the current planned Roseworthy Township (refer to **Figure 3.2** below).

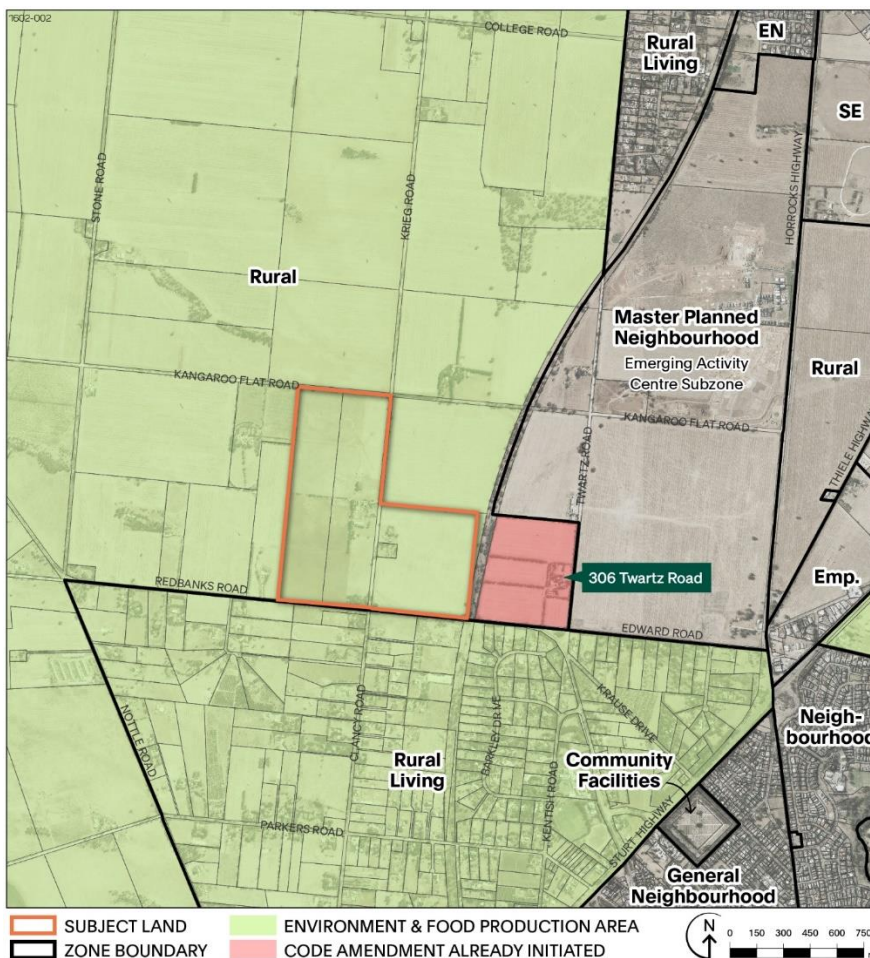


Figure 3-2: Aerial View of Subject Site and Locality (subject site in blue)

Land to the eastern side of the (former) train line is generally located within the ‘**Master Planned Neighbourhood Zone**’ and is currently being developed as an expansion of the Roseworthy Town Centre, which includes the following estates:

3.2.1. ST YVES



Figure 3-2: St. Yves, Roseworthy Masterplan

- **Land Vision Group - St. Yves**

- This estate encompasses 68 hectares of land south of Roseworthy, and forms a major part of the Roseworthy Town Expansion to become a future regional centre. This residential estate features the following as shown in **Figure 3.4** above:
 - » 8000 square metres of retail featuring a 4,000 square metre Coles supermarket, food and beverage outlets, and speciality shops;
 - » Medical Centre and wellness precinct;
 - » Community Hub featuring Council Library, Club house, and other facilities;
 - » Recreational area comprising 13.6 hectares of public open and active spaces including wetlands, bike trails, 2.5 km walking trails and playgrounds for children and pocket parks; and
 - » Trinity College R-10 campus for 650 students. The proposed campus will open at the start of 2024 for Preschool to Year 4 students, and will consist of a full-size oval, a soccer pitch, indoor and outdoor basketball, netball and tennis courts, and an Early Learning Centre with designated playground, as identified in the **Figure 3.5** below.



Figure 3.5 – Trinity College R-10

3.2.2. ROSEWORTHY GARDEN



Figure 3-3: Roseworthy Garden Masterplan

- **Hickinbotham - Roseworthy Garden**
 - This 60 hectares estate features a central reserves than expanses over 12 hectares, as identified in the **Figure 3.5** above.

3.2.3. VILLAWOOD – WILLIAM LAKES

- This 129.4 hectares estate features the following as shown in **Figure 3.6** and **Figure 3.7**:
 - » 1,700 Residential Allotments;
 - » Residents' Club featuring function centre, gymnasium, café, pool, and other amenities; and
 - » Recreation areas including ornamental lakes, walking and cycling trails, wetlands, and playgrounds and parks.



Figure 3-4: William Lakes Masterplan



Figure 3-5: Aerial view of proposed William Lakes estate

3.2.4. 306 TWARTZ ROAD

Land at 306 Twartz Road directly opposite the subject site, over the historic rail corridor, is currently subject to a Code Amendment (Draft 306 Twartz Road Gawler Belt Code Amendment) to rezone land from the Rural Zone to the Master Planned Neighbourhood Zone (refer to **Figure 3.2**). To the south of the subject site is the existing Rural Living Zone and to the north and west is agricultural land located in the Rural Zone.

The wider locality comprises agricultural farm land to the west, rural living allotments to the south of Redbanks Road, the University of Adelaide's Roseworthy Agricultural College located approximately 5km northwest, and the Xavier College located approximately 1km southeast, all other community facilities and services are generally located at the existing towns of Hewett and Gawler to the south and Roseworthy to the north.

3.3. Existing Zone & Policy Framework

The subject land is currently located within the '**Rural Zone**' of the Planning and Design Code (Version 2023.15 dated 26 October 2023). **Figure 3.3** identifies the current zoning that applies to the subject site and surrounding properties.

The subject land is affected by a number of 'Overlays', including the '**Environment and Food Production Area**' Overlay.

4. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

The Greater Adelaide Regional Plan (GARP) Discussion Paper identifies that current population projections demonstrate that by 2051 we must plan for an additional 670,000 people in Greater Adelaide. The Paper outlines that we need to supply 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes beyond the existing 200,000 new homes already planned for. The Paper identifies that an additional 100,000 homes is the equivalent of 10 Concordia or Dry Creek developments and that under this growth scenario that we will run out of land for future residential development within Greater Adelaide within 30 years if an ongoing rezoning program is not developed.

The Discussion Paper has identified that growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success.

The Paper projects that the highest proportion of new growth will be located within the 'Outer North' area, with almost 59,000 new homes or 19% of the projected growth within this area of Greater Adelaide (refer to **Figure 4.1** below).

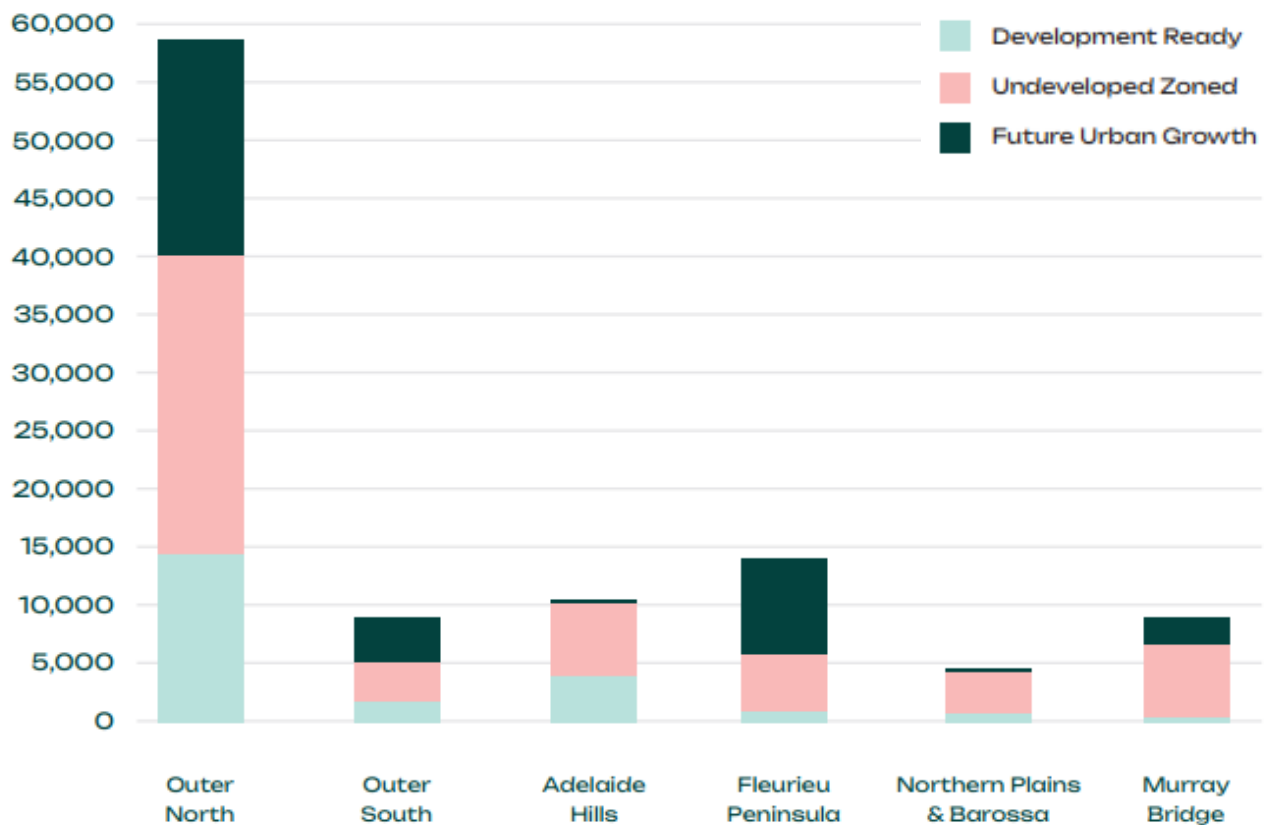


Figure 4-1: Projected Future Land Supply CBD

(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023, page 108)

The Discussion Paper identifies four main greenfield ‘Investigation Areas’ on the fringe of Metropolitan Adelaide for future housing and employment growth, with these areas being based on the State Planning Commission’s seven (7) identified land supply principles identified in the Paper.

The areas proposed for detailed investigation extend from Adelaide’s four major transport spines with the intent to capitalise on ongoing government investment along these growth corridors.

This includes a ‘north-east spine’ that begins at Kudla and extends towards Roseworthy. Importantly, the paper identifies that the investigations will not consider land on the eastern side of the Horrocks Highway. The subject land of this submission is located to the west of the Horrocks Highway.

The land to the south of the current Roseworthy township is identified as a proposed ‘Growth Investigation Area’ for both housing and employment growth, as identified on **Figure 4.2** and **4.3** respectively below.

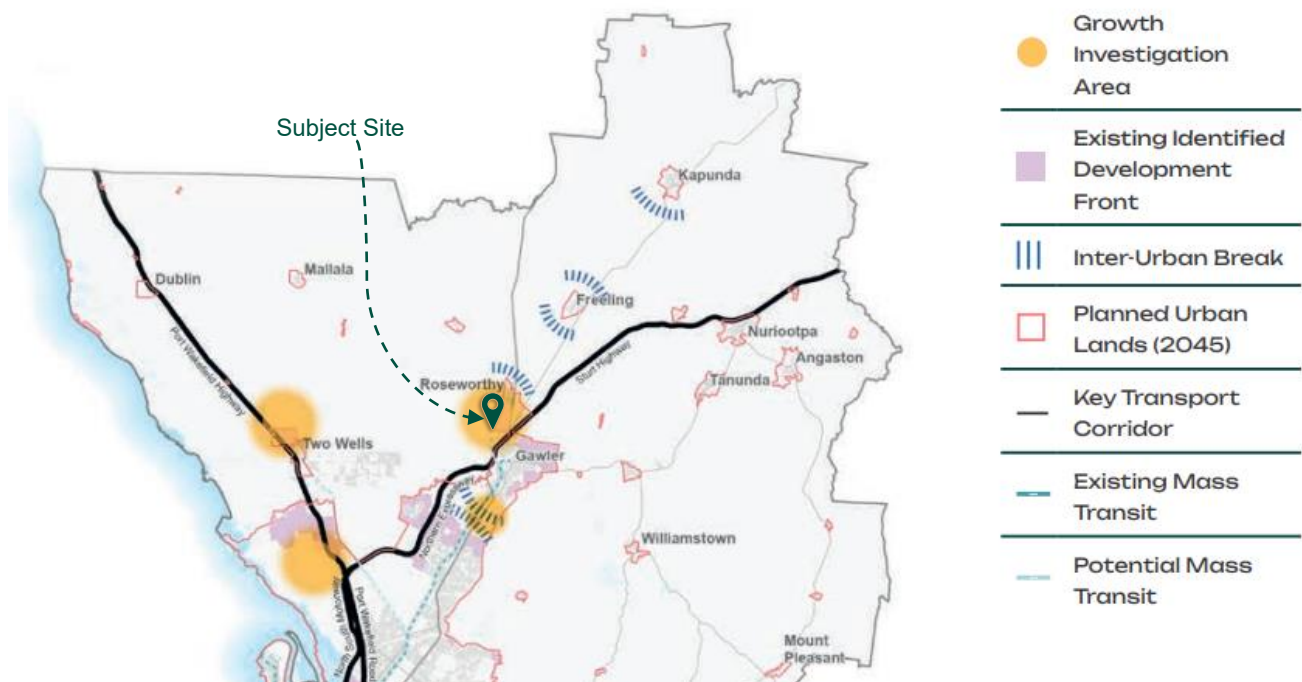


Figure 4-2: Proposed ‘Growth Investigation Areas’, north of Adelaide CBD
(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023, page 126)

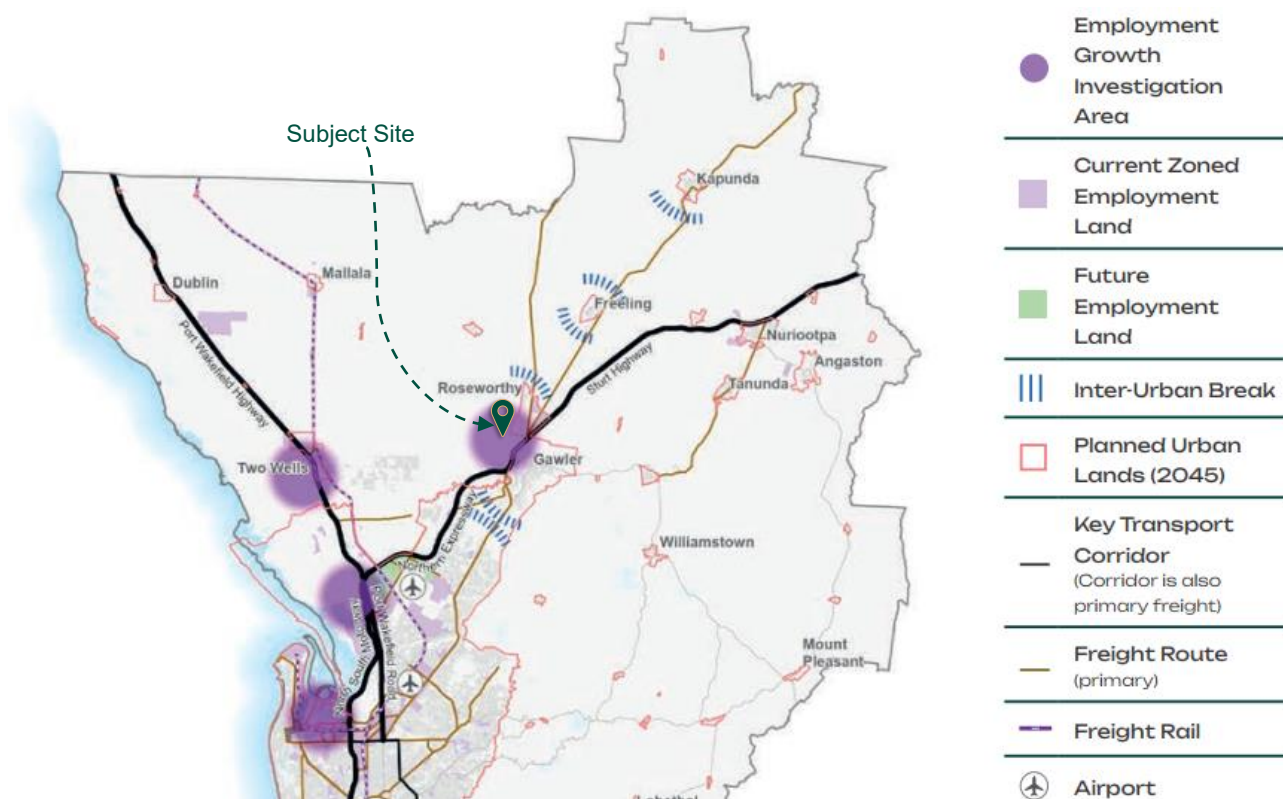


Figure 4-3: Proposed 'Employment Growth Investigation Areas', north of Adelaide CBD
(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023)

We note the following challenges identified in the Discussion Paper for the 'north-east spine' and the suitability of the subject land to address each of the challenges identified:

Challenge (identified in the Discussion Paper)	Response (Land Suitability)
<ul style="list-style-type: none"> Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed. Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance. 	<ul style="list-style-type: none"> The Paper identifies that land within the current EFPA would likely meet future growth needs in the 16-30 year period. Whilst noting the location of the subject land within current EFPA, we note that the land is contiguous with existing urban land and represents a logical expansion of metropolitan Adelaide. The land can be immediately developed given access to existing transport networks and services (i.e. does not need to wait for the 16-30 year period) and its development would not leapfrog existing urban areas.

Challenge (identified in the Discussion Paper)	Response (Land Suitability)
<ul style="list-style-type: none"> It will be important to ensure that there is an inter-urban break between development at the north end of the City of Playford and the southern extent of the Town of Gawler 	<ul style="list-style-type: none"> The subject land is located to the north-west of Gawler so would not result in a loss of the suggested inter-urban break.
<ul style="list-style-type: none"> It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency 	<ul style="list-style-type: none"> The subject land is located in proximity to existing Employment Lands including land to the east of Horrocks Road zone as 'Employment Zone' and 'Strategic Employment Zone' and the development of a new neighbourhood activity centre in the Roseworthy township.
<ul style="list-style-type: none"> The opportunity to further extend urban development at Roseworthy will need to be balanced with an assessment of the contribution this land makes to the state's economy from cereal cropping. 	<ul style="list-style-type: none"> Advice received from a specialist Senior Agronomist (attached in Appendix 2) identifies that the land is not a viable option for broad acre farming.

5. SUITABILITY OF SUBJECT LAND FOR URBAN DEVELOPMENT

5.1. Subject Land Potential (Capacity)

Assuming a conservative yield of 10 dwellings per hectare (gross) and land area of 93 hectares, the subject land could yield in the order of 930 dwellings.

This would amount to an additional 4.9% supply to the 19,000 projected supply in the Outer North Area of Greater Adelaide.

Based on a limited 'desktop' assessment of the site (and setting aside the current EFPA boundary), we are of the opinion that the site would have limited constraints that would prevent future development achieving this dwelling yield given:

- Topography – The land is relatively flat and not topographically constrained future development options;
- Native vegetation – the site has been predominantly cleared of vegetation and is being used for primary production cereal cropping. Mature vegetation is confined to the perimeter of the site and adjacent site boundaries where it could likely be retained and accommodated in any future development of the subject land. There is an area of vegetation near the intersection between Redbanks Road and Krieg Road that is ideally located to form part of future open space;

- Flooding – the current Hazards (Flooding) and Hazards (Flooding – General) Overlay are limited to a small area of the subject site along the southern boundary and any areas of exiting flooding or drainage areas could be suitably mitigated through an engineered response in a future development of the subject site including possible incorporation of any required stormwater conveyance and detention in open space reserves and corridors; and
- Heritage – There are no State or local Heritage Places on the subject land and a Taa Wika search of registered Aboriginal Sites and Objects has identified no existing record of any Aboriginal sites or objects on the subject land.

5.2. Transport & Connectivity

The subject land is located adjacent to the south-western extent of the currently Roseworthy Township boundary (as defined by the current ‘Master Planned Neighbourhood Zone’ in the Planning and Design Code).

Performance Outcome 14.1 of the Master Planned Neighbourhood Zone seeks that:

- PO 14.1 Development that is compatible with the outcomes sought by any relevant Concept Plan contained within Part 12 – Concept Plans of the Planning and Design Code to support the orderly development of land through staging of development, provision of infrastructure and the location of new activity centres.

Part 12 of the Code includes ‘Concept Plan 50 – Roseworthy Town Expansion’ (see **Figure 5.1** below) that applies and sets out a series of road and cycle network enhancements. The subject land is well located to connect directly to the envisaged pedestrian cycle way and has direct access to Redbanks Road.

A high level traffic assessment has been received from Empirical Traffic Advisory (see **Appendix 1**). The traffic assessment has found:

- Predicted traffic volumes on Redbanks Road, including traffic generated by the Roseworthy precinct, will remain within the existing road capacity with one lane in each direction. It is likely that some upgrades to Redbanks Road would be required to increase pavement width (to 7.0 metres), and provide sealed shoulders/bicycle lanes in each direction (1.5 metres in each side).
- Access points on Redbanks Road to the Subject Land would require intersection treatments, including channelised right turn lanes.
- The use of Krieg Road would require a four-way intersection upgrade at Redbanks Road, which could include channelised right turn lanes or a roundabout. This will be dependent on the traffic on the southern leg (Clancy Road) of the intersection.
- There are existing infrastructure deed arrangements for the road network upgrades in the Gawler Belt/Roseworthy area. Traffic generated by the Subject Land could be considered in these upgrades of the road network

Macladan and Krieg recognise and understand that it may be necessary to enter into an infrastructure agreement to ensure the provision of the necessary services and infrastructure to serve the future community, which would likely occur prior to the authorisation of a Code Amendment to rezone the land. This infrastructure agreement could be in the form of a Deed registered against the land via a Land Management Agreement (LMA) or alternatively a ‘Basic Infrastructure Scheme’

managed by an independent scheme coordinator pursuant to Part 13 (Infrastructure Frameworks) of the Planning Development and Infrastructure Act 2016.

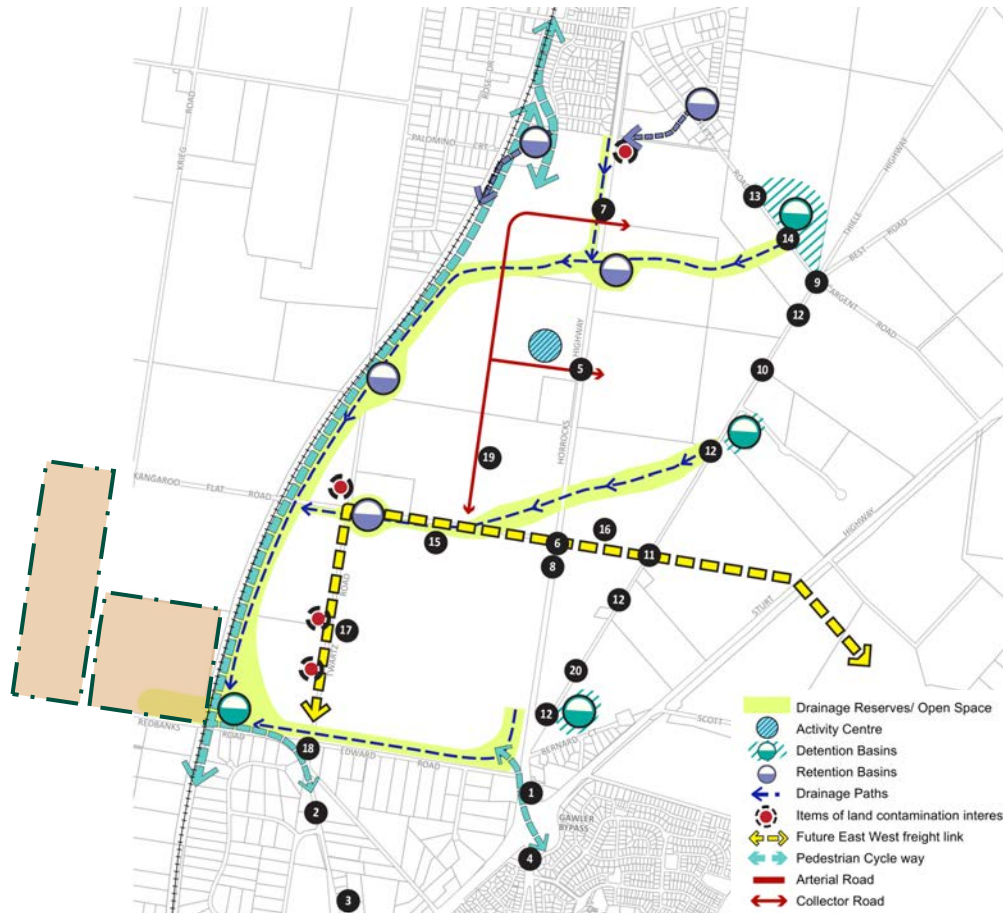


Figure 5-1: Concept Plan – Roseworthy Town Expansion (Source: Planning and Design Code)

5.3. Viability of Land for Primary Production

Advice has been received from a Senior Agronomist, Chris Butler, Roseworthy Rural Supplies Pty Ltd on the primary production value of the land (attached in **Appendix 2**).

Chris Butler has advised:

- The two standalone farms (of approximately 61 and 32 hectares respectively) are not a viable option for a broad acre farming enterprise as the costs are too high against expected returns – and there is little allowance possible against the risk of a drought year. Broadacre farming in the area is principally wheat, barley, canola, lentils, peas and Faba beans. Land is generally cropped in rotation with these crops.
- There is also little option for horticulture or dairy farming as the set up costs and running costs are too high to make economic value into the future. Dairy farming is unlikely to be viable as the land area is not large enough to run a viable sized herd of approximately 300 cows and grow anywhere near the feed in hay or grain to feed the cows.

- There is no or limited underground water available on the land and the availability to get “scheme” water is prohibitively expensive against the potential for horticultural production. This is evidenced by the fact that the latest water available to horticulture from Bolivar has not been taken up by many growers sighting expense as the main issue.

Accordingly, given the size and configuration of the subject land, current costs of primary production and the limited availability of a cost effective water supply – the subject site is not considered a viable option for broad hectare cereal farming as a standalone enterprise.

5.4. Propensity for Development

The large 91 hectares of land is under the ownership of only two entities, providing simple ownership arrangements and ability to proceed with development.

Both owners strongly support: The identification of the subject land as a future urban growth area;

- The removal of the Environment & Food Production Area (EFPA) from the subject land;
- The immediate initiation of a Code Amendment to rezone the land and facilitate future urban development and housing.

The physical features of the site are conducive to future urban development with the site having minimal gradient and generally being cleared to accommodate the existing farming use.

The subject site therefore has a strong propensity for future development and delivery to market should it be identified as a future urban growth area to contribute to the supply of affordable housing across Greater Adelaide.

6. CONCLUSION

This submission is provided to assist the State Planning Commission’s upcoming review of the Regional Plan for Greater Adelaide.

We are of the opinion that the subject land would be a logical and sequential extension and expansion of the Roseworthy Township as part of the identified Growth Investigation Area to meet the future land supply needs for Greater Adelaide as identified in the Greater Adelaide Regional Plan Discussion Paper.

Based on preliminary ‘desktop’ analysis the subject site does not have any likely constraints that would prevent or inhibit future urban development and the land is not fragmented and is under the control of a single entity to enable a coordinated approach and delivery of future housing in a master planned community.

Macladan and Krieg therefore request that the subject site is identified as a ‘future urban growth’ area in the next iteration of the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years).

Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

Yours sincerely,



Rick Hutchins

Associate

CC: The Macladan Investments Trust





APPENDIX 1

Traffic Assessment (ETA)

1 November 2023

#eta1000120

Ekistics

Level 3, 431 King William Street

Adelaide SA 5000

Attention: Mr. Rick Hutchins

LAND AT KRIEG ROAD, GAWLER BELT & KANGAROO FLAT – FUTURE URBAN GROWTH AREA - HIGH LEVEL TRAFFIC ASSESSMENT

Dear Rick,

I refer to the investigations for the inclusion of land adjacent Krieg Road in Gawler Belt & Kangaroo Flat (Subject Land) as a future urban growth area in the future *'Regional Plan for Greater Adelaide'*. As requested, this letter provides the findings of a high level traffic assessment for the future development of the Subject Land in order to understand the impact on the adjacent road network infrastructure.

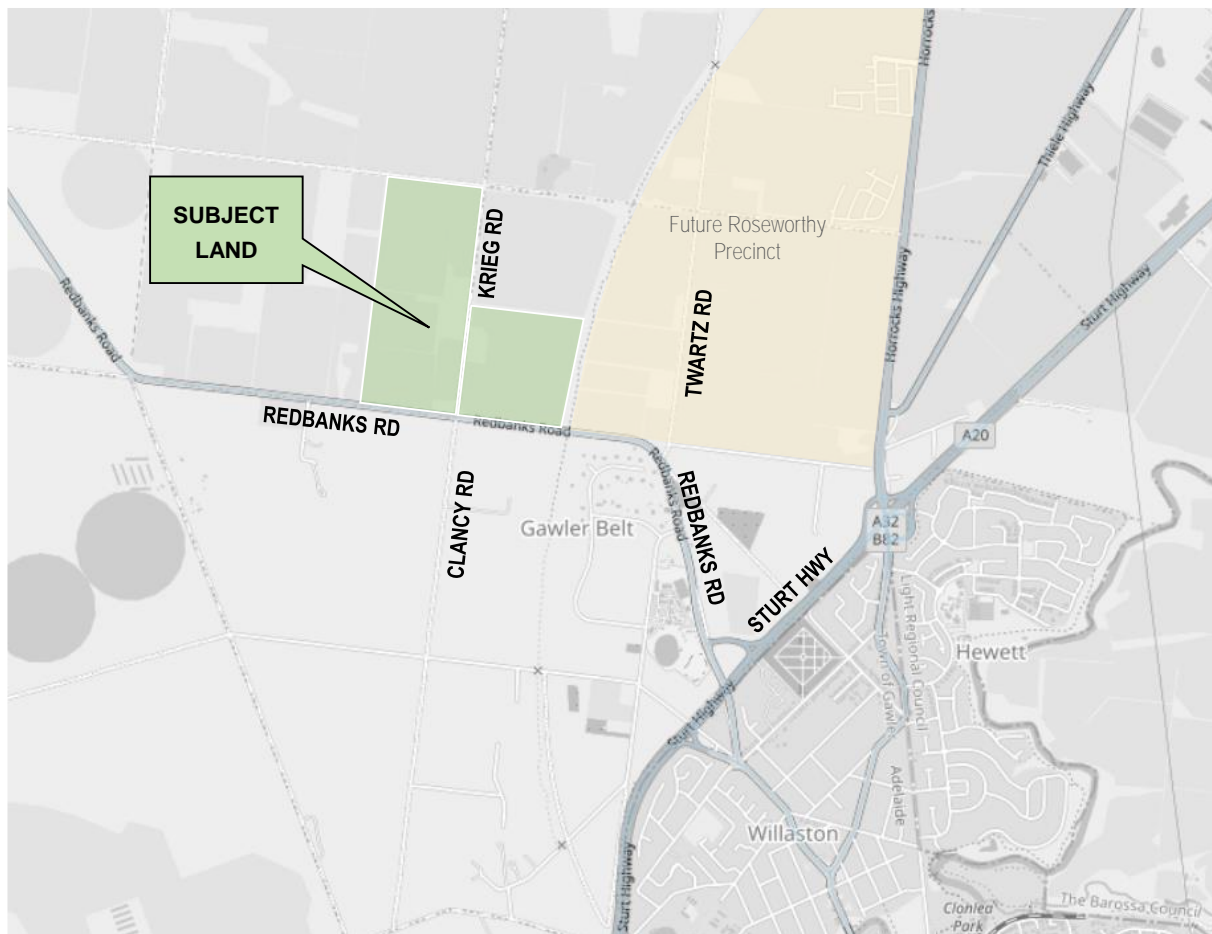
SUBJECT LAND

The Subject Land is located on two parcels on the eastern side of Krieg Road in Gawler Belt, and west of Krieg Road in Kangaroo Flat, and both to the north of Redbanks Road. Both parcels have frontages of 500 metres or more to Redbanks Road, and the western parcel has approximately 1.2km of frontage to Krieg Road (upto Kangaroo Flat Road), and the eastern parcel has over 500 metres frontage to Krieg Road. The parcels are approximately 30 hectares and 61 hectares in size for the eastern and western parcels respectively.

Both parcels in the Subject Land are located within a Rural zone and each are currently occupied by a dwelling and cropping land. The surrounding properties include a mix of existing rural living dwellings to the south, and cropping land to the north, east and west of the site. The surrounding land to the north-east of the site is currently zoned as Master Planned Neighbourhood, with residential housing estates (such as St Yves) beginning to be constructed within the area.

The Subject Land is shown in Figure 1.

Figure 1: Subject Land and Environs



(source: SAPPA 2023)

EXISTING ROAD NETWORK

Redbanks Road is an arterial road managed and maintained by the Department for Infrastructure and Transport. It comprises of a single carriageway with a single traffic lane in each direction. Redbanks Road has a posted speed limit of 80km/h to the west, changing to 60km/h to the south of Twartz Road.

Redbanks Road carries approximately 3,300 vehicles per day (based on Department for Infrastructure and Transport traffic data from 2019) with 12% commercial vehicles and is gazetted for vehicles up to a 36.5m A-Double.

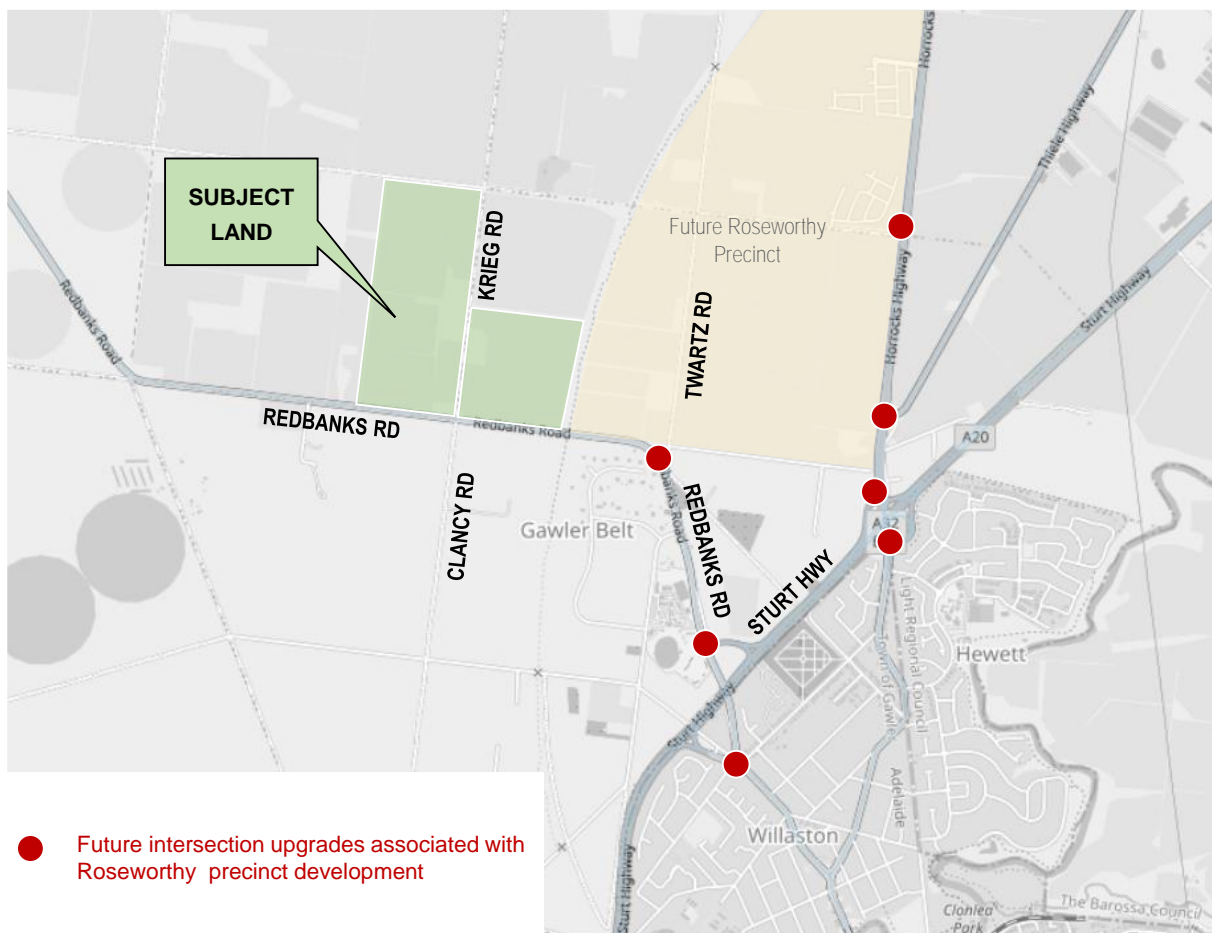
Krieg Road is a local road with an unsealed carriageway aligned north-south with an intersection at Redbanks Road to the south and Kangaroo Flat Road to the north. Krieg Road is estimated to carry less than 100 vehicles per day based on its connectivity in the road network and the surrounding existing land uses.

Kangaroo Flat Road is an unformed road (track) to the east of Krieg Road, and an unsealed road to the west. It currently does not connect through to the east of the Subject Land.

ROSEWORTHY PRECINCT

The area between the existing Roseworthy township, the existing rail corridor, Horrocks Highway and Edward Road has previously been subject to a Development Plan Amendment (DPA) assessment under the previous planning system. As part of the DPA, a report, Roseworthy Township Expansion DPA Infrastructure Investigations report, dated November 2014, was prepared to identify Road Infrastructure requirements. This was used to develop an Infrastructure Deed for the Roseworthy precinct. The infrastructure deed includes requirements for upgrades to various intersections in the adjacent road network as shown in Figure 2.

Figure 2: Roseworthy Precinct Road Intersection Upgrades



A high-level review of the provided existing infrastructure deed indicates upgrade requirements will be triggered when developed allotments within the area and daily traffic volume thresholds are met. Key elements of the deed include:

- Redbanks Road seal widening and upgrade.
- Upgrade to the Redbanks Road Interchange.
- Twartz Road upgrade to a sealed collector road and Redbanks Road/Twartz Road intersection upgrade.

HIGH LEVEL TRAFFIC ASSESSMENT

It is understood that rezoning of the land could result in the development of residential allotments based on approximately 10 dwellings per hectare. This would result in approximately 300 and 610 dwellings in the eastern and western parcels respectively for a total of approximately 910 dwellings.

Based on a typical traffic generation rate for low density residential dwellings of 8 trips per dwelling, the rezoning could result in a total of 7,280 trips per day generated in the Subject Land.

Traffic could be distributed to Redbanks Road from new access points for each site. This could also include the use of Krieg Road. Possible access arrangements are shown in Figure 3.

Figure 3: Possible Access Arrangements



It is likely traffic would distribute mostly to the east, with some traffic to the west and some to the north into the Roseworthy precinct. Traffic volumes associated with the Roseworthy precinct have also been considered in the traffic impact, with the Subject Land traffic generation added to these volumes. The possible traffic generation and distribution is shown in Figure 4.

Figure 4: High Level Predicted Traffic Volumes



CONCLUSIONS

This high level traffic assessment has found the following:

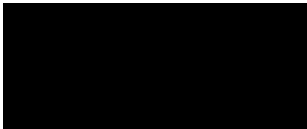
- Predicted traffic volumes on Redbanks Road, including traffic generated by the Roseworthy precinct, will remain within the existing road capacity with one lane in each direction. It is likely that some upgrades to Redbanks Road adjacent the Subject Land would be required to increase pavement width (to 7.0 metres), and provide sealed shoulders/bicycle lanes in each direction (1.5 metres in each side).
- Access points on Redbanks Road to the Subject Land would require intersection treatments, including channelised right turn lanes.
- The use of Krieg Road would require a four-way intersection upgrade at Redbanks Road, which could include channelised right turn lanes or a roundabout. This will be dependant on the traffic on the southern leg (Clancy Road) of the intersection.

- There are existing infrastructure deed arrangements for the road network upgrades in the Gawler Belt/Roseworthy area. Traffic generated by the Subject Land could be considered in these upgrades of the road network.

Should further information be required, please contact the undersigned at your convenience.

Yours sincerely

EMPIRICAL TRAFFIC ADVISORY



Paul Morris

Director

M.TransTraff, MAITPM



APPENDIX 2

Senior Agronomist Advice

Roseworthy Rural Supplies Pty Ltd

Agricultural Chemicals-Agronomic Consultancy

14/8/23

Report for Matthew Sheedy. Re; **38 Krieg Road Gawler Belt.**

Agronomy perspective. *Primary production potential of this 32 hectare parcel of land.*

Background;

Chris Butler. Retailer/Agronomist

35 + years of experience in the Lower North Agricultural broadacre cropping area as a retailer and advisor to farmers.

Primary production value of land in the area can be established from the land value view and the production capacity view. If we take the one 32 Ha section of land it is worth about \$28000.00 to \$30000.00 per Hectare on the most recent prices paid for similar land in the area. At 5% return on Capital that would make a return of \$1450.00 per ha needed for a modest return before costs of rates, taxes, water and other maintenance costs. This does not include the cost of ownership or contracting costs needed to generate production from this land. Average production of Wheat in this area with the best of modern farming methods averages approximately 3.5 to 4 tonne per Hectare (seasonal influences are common) At a recent average price of approximately \$400.00 per tonne at the high end that would pay \$1600.00 dollars per Hectare gross leaving \$150.00 per hectare for all other expenses. Thus no return on Capital invested and no profit. Especially when taking into account the need for diverse equipment or contractor costs for multiple passes across the land. Other crops return approximately the same or less in the rotational system of farming so profits are not achievable by changing crops. It is likely that the five year rolling average would be less as other crops need to be rotated for good agronomy. Principle crops grown in this area are Wheat, Barley, Canola, Lentils, Peas and Faba Beans. Land is generally cropped in rotation with these crops.

There is no underground water available on this land and the availability to get "scheme" water to the block is prohibitively expensive against the potential for horticultural production. This is evidenced by the fact that the latest water available to horticulture from Bolivar has not been taken up by many growers sighting expense as the main issue.

The block also has several hectares in the south west corner that flood from run off in the drainage system, thus the full 32 Hectares is not always in full production every year. The wetter it is the more land area is lost to production, further reducing the production potential. There is little potential for drainage from the site or there is a high cost once again reducing potential income.

Summary; As a standalone block to farm, 32 Hectares is not a viable option for a broad acre farming enterprise as the costs are too high against expected returns. There is little option for horticulture as the set up costs would be too high to make economic value into the future.



Chris Butler

Senior Agronomist

Roseworthy Rural Supplies Pty Ltd

14/8/2023

Roseworthy Rural Supplies Pty Ltd

Agricultural Chemicals, Seed and Fertilizer- Agronomic Consultancy

18/10/2023

Report for NT, LJ and JA Krieg

53 Krieg Road, Kangaroo Flat, SA, 5118.

Agronomy perspective; **The potential for profitable returns from a small 61 hectare parcel of land.**

Background;

Chris Butler. Retailer of Seed Fertilizer and Pesticides/ Senior Agronomist.

35 plus years of Agricultural advisory and supply in the Lower North Broad Acre Agricultural area to farmers in this area.

The value of the land can either be considered from the perspective of "sale value" or production potential. The sale value does not take into account the ability for the land to provide a profit against the cost of production or a living for the owner. *"Asset rich : Cash poor"*.

The production potential for the 61 Hectare parcel of land;

- The most average crop grown in the area is Wheat. Wheat usually averages 3.5 to 4 tonne per Hectare in this area, with the yields in any one year being quite volatile due to seasonal influences around rainfall. Recent prices for wheat at harvest have been \$350.00 per tonne to \$425.00 per tonne at the delivery site (gross income). 61 Hectares at 4 tonne per Hectare at \$400.00 per tonne = gross income of \$97600.00. Input costs and fixed costs must then be taken from this gross amount before leaving a profit to be shared by the owners. The cost of growing wheat varies from season to season but can be as much as \$250.00 to \$300.00 per Hectare (or more). \$18300.00 minimum production cost plus fixed costs.
- $\$97600.00 - \$18300.00 = \$79300.00$ less rates and taxes, farm repairs and maintenance, fuel and other ancillary costs. This could easily whittle the income down to \$60000.00 less Income tax. Divided between two families \$30000.00. Not much of an income for 12 months work.
- Other crops can produce similar incomes, seasonality, volatile weather and prices have similar effect in the gross income.
- There is no potential for horticultural production in this area as there is no or limited underground water available. If water was piped in the cost of infrastructure, energy and water would be prohibitive against the income from production. Further costs are involved in machinery finance to plant or care for crops.
- Dairy production is also very unlikely to be viable as the land area is not enough to run a viable herd of 300 (aprox.) cows and grow anywhere near the feed in hay or grain to feed the cows. The nearest comparable Dairy farm is at Two wells and has struggled to be viable. Irrigation whilst technically possible is prohibitively expensive and even then irrigating say 50 of the 61 hectares would not be viable Agronomically over time.

61 Hectares could be leased to a neighbour at perhaps \$600.00 per hectare. 61ha @ \$600.00= \$36600.00 less ownership costs such as rates and taxes and income tax and GST. This is most likely a lower income than self-farming but the inputs from a personal financial or physical point of view are less.

Farming land in the area has a capital value of \$32000.00 (approx.) per Hectare (Wasley's most recent sale) 61 Hectares @ \$32000.00=\$1,952,000.00. If we looked for a 5% return on capital then this would return a gross \$97600.00 less ownership costs.

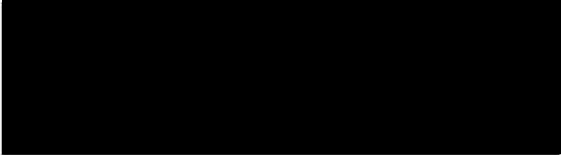
Income from the land as a farm can be seen to be nonviable as an income source for two families.

The land could be leased to another farmer and the current owners could find employment elsewhere.

Summary; As a standalone block to farm, 61 Hectares is not a viable option for a rain fed broad acre farming enterprise. The costs are too high against the expected income generated and there is little allowance possible against the risk of a drought year.

There is little option for Horticulture or Dairy farming as the set up costs and running costs are too high for a 61 Hectare block.

There is little chance of making a fair income from this land.



Chris Butler
Senior Agronomist
Roseworthy Rural Supplies Pty Ltd

DTI:PlanSA Submissions

From: Grazio Maiorano [REDACTED]
Sent: Monday, 6 November 2023 9:44 AM
To: DTI:PlanSA Submissions
Cc: Simon Cross; Sarah Lowe
Subject: GARP Discussion Paper Submission - MacDonald Park
Attachments: 231101 V3 GARP Submission.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Please find attached submission prepared on behalf of Maranello Holdings Pty Ltd.

Kind regards



Grazio Maiorano
Director
[REDACTED]

2 / 27 Halifax Street
Adelaide SA 5000
(Access via Symonds Place)



Kaurna Country

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316 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – MacDonald Park

We are acting on behalf of Maranello Holdings Pty Ltd (Proponent) who is seeking to Initiate a Code Amendment affecting their MacDonald Park land.

The Discussion Paper has been released for community and industry comment. The Paper provides a vision for the Greater Adelaide region to 2051. We commend the State Planning Commission for the work undertaken in preparing this Paper.

The Land

The Proponent is seeking to rezone the land at Curtis Road, MacDonald Park identified as Allotment 1 in D80814 (CT6035/394) within the City of Playford (the land). The land (refer to below Figure 1) is currently zoned Rural Horticulture and is proposed to be rezoned for residential, commercial and education land uses. Figure 1 identifies the land and the surrounding residential land divisions.



Figure 1: The Land (in blue shade) and surrounding land divisions.

Extracts from the GARP Discussion Paper

Having regard to Figure 9 on page 126 and Figure 11 on page 141 of the Discussion Paper, it is unclear if the land has been identified as a site that can potentially accommodate urban development. For the reasons outlined below, this is of concern, particularly when the site adjoins the identified north-eastern spine.

Background

Prior to the Northern Expressway's (NExy) completion in 2010, land held by the Proponent, referred to as Brookmont and Brookmont West, was contiguous and used successfully for horticultural purposes.

The chosen alignment of the NExy resulted in the previous 220-hectare property being dissected into two pieces with the following resulting sizes:

- Brookmont – 69ha (approx.) This parcel is now unsuitable for irrigated horticulture and experiences reduced production.
- Brookmont West – 120ha (approx.).

Justification for Urban Development

Encompassed by Urban Development

As illustrated in Figure 1, the land has become surrounded by residential, rural living and employment land uses that are zoned:

- Rural Living to the south and west;
- Master Planned Township to the north; and
- Master Planned Neighbourhood and Employment to the east.

The consequence of these zones is the creation of an 'island' of land zoned Rural Horticulture. From a strategic land use perspective, it is illogical to suggest that this land should remain rural.

The land parcel is of a size to deliver a well-planned land division catering for the needs of the community. Rezoning of the land for urban purposes would provide a range of benefits, including:

- It provides a continuous expansion of the urban area;
- Presents an infill opportunity to contain the Greater Adelaide urban footprint;
- Supports existing investment in transport infrastructure; and
- Can be serviced by a range of nearby activity centres and recreation facilities.

Rural Residential Interfaces Concerns

Ongoing operation as a potato farm is problematic with complaints regularly received from neighbours regarding noise during harvesting and spray drift associated with crop management. As the intensity of urban land use around the rural land increases the tensions between land uses interfaces will increase. This is problematic for the Proponent and future residents.

Need for Affordable Development

Having regard to the existing housing crisis, it is difficult to understand why the land has not been considered for urban purposes. For instance, affordable housing can be created on the site that is serviced by a range of services (eg its located within 5 km of the Elizabeth Regional Centre); and within close proximity to a range of existing and proposed employment lands. The land is also easily accessible from the Northern Expressway provide connection to services.

Contributing to a Curtis Road Solution

We understand that Council and the Department of Infrastructure and Transport (DIT) are in discussions regarding the role and function of Curtis Road. These discussions should not preclude the land from being identified for future urban development.

If DIT desires land for road widening purposes, it can flag it now and the Proponent will be willing to engage in discussions and consider all reasonable options to address DIT's objectives.

At the very least, at the Code Amendment stage, the State can introduce the "Future Road Widening Overlay". The Overlay triggers a referral to the Commissioner of Highways. The Commissioner has the right to direct the planning authority to refuse the development application.

Development Ready - 2027

The timing of the Proponent's development processes means that as a best-case scenario, if the State was supportive of a Code Amendment residents wouldn't be moving to the site until late 2028. This timing factors in:

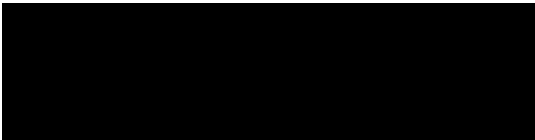
- Existing lease over the land.
- The existing Brookmont development to the east of NExy has another 3-4 years to completion. It will be desirable if construction can flow to the western site with little interruptions to construction and marketing programs.
- A Code Amendment will require approximately 18 to 24 months to complete.
- A land division development application including construction drawings etc will require approximately 12 months.
- The construction period for the 1st stage of the development will require approximately 9 months.

We are also conscious that Council considers it is dealing with several development fronts and this is having a negative impact in their ability to resource the management and coordination of development. While we are sympathetic to this issue, it is not a reason to hamper the logical and orderly identification of medium-term development sites within a strategic planning document.

Desired Outcome

Having regard to the justification provided in this submission, we encourage the Commission to identify the land as being suitable for urban development.

Yours sincerely



Sarah Lowe
Consultant

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Wednesday, 27 September 2023 8:11 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper

Customer type: Member of the public

Given name: Mark

Family name: Taylor

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: To whom it may concern, I am the owner of property [REDACTED] Kudla 5115 and I would be interested in future sub-division for the development of houses on my land and would like to have 300 sq/m plots to offer affordable houses. I would like this to be taken into consideration at future planning consultations about Kudla. Regards Mark.

Attachment 1: No file uploaded

Attachment 2: No file uploaded

Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

Sent to
proponent plansasubmissions@sa.gov.au
email:

DTI:PlanSA Submissions

From: Matt Loni Hunter [REDACTED]
Sent: Thursday, 31 August 2023 11:18 AM
To: DTI:PlanSA Submissions
Subject: Greater Adelaide Regional Plan Discussion

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi,

I am a resident in Kudla and recently was made aware of this discussion paper and the current feedback process.

Firstly it is an absolute joke to call this process consultation. This paper should be printed and sent to every resident in the areas to be potentially affected by the plan.

As a new resident in Kudla, I don't understand what consultation, planning or investigation has been done to choose Kudla as a potential area for extension of the Gawler township. Large parts of Kudla are large lifestyle blocks around 1 ha in size. There has been recent ongoing growth of new builds happening in this area on large block sizes. Developers are not going to be interested in building around existing houses and developments and it will be impractical to put in services. You will not be able to force the sale of these houses for such a development. Areas that would be better chosen for this type of development would be sections of Kudla north of Athol Rd where the block sizes are larger and Hillier where they are larger. Greenfield sites will better suit this type of development as developers can come in and take large blank multi hectare block and turn them into developments without having to work around existing houses. New residents in new builds in Kudla like myself are not interested in living in an area with many houses on small blocks and I have heavily invested in the creation of a lifestyle block where we are. Blocks any smaller than 1 acre will likely be seen as changing the character of the area too much and will result in devaluing our properties and ruining the lifestyles which is the reason we have bought and built here.

There will be some long term residents who will be very interested in selling their large blocks for development however it is unlikely it will increase the value of their land over what it is currently worth. Someone needs to come and drive around Kudla to see the number of new houses being built on blocks around 2-4 acres to realise that it will not be suitable for greenfield development because the area is very quickly turning into large lifestyle blocks.

Further the proposal to create parklands as a green wedge between Gawler and Playford would require the compulsory purchase and demolition of many houses along Dalkeith Rd. There are currently two houses being constructed along this road on 2-4 acre properties with numerous other houses built within the last 10 years. How this would be achieved makes no sense to me. On the other side of Angle Vale Rd in Hillier there are large portions of land that are undeveloped. There would be potential along the Kudla portion of Angle Vale Rd but Dalkeith Rd would largely not be suitable due the reasons I have noted.

I would suggest actually meeting with the people in Kudla and driving through the area and you will realise there are better areas suited to this type of development.

Finally myself and many other residents in Kudla with vehemently oppose any plans to change the character of the large lifestyle blocks that have been developing here over the last 5-10 years.

Regards,

Matthew Hunter



DTI:PlanSA Submissions

From: Emily Nankivell [REDACTED]
Sent: Thursday, 2 November 2023 11:13 AM
To: DTI:PlanSA Submissions
Subject: Submission to the Discussion Paper on the Greater Adelaide Regional Plan
Attachments: Submission to the GARP Scotty's Corner, Medindie.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Growth Management Team,

Please see **attached** submission to the the Discussion Paper for the Greater Adelaide Regional Plan in relation to contiguous allotments on the corner of Main North Road and Nottage Terrace, Medindie, including but not limited to the land containing Scotty's Motel.

Please confirm receipt of the submission.

Kind regards,

EMILY NANKIVELL
Associate Director



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

Note: This email and any attachments are confidential, privileged or private and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the sender immediately and delete the email. Future Urban Pty Ltd. disclaims liability for the contents of private emails.

November 2, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001
Via email: plansasubmissions@sa.gov.au

Dear Mr Holden,

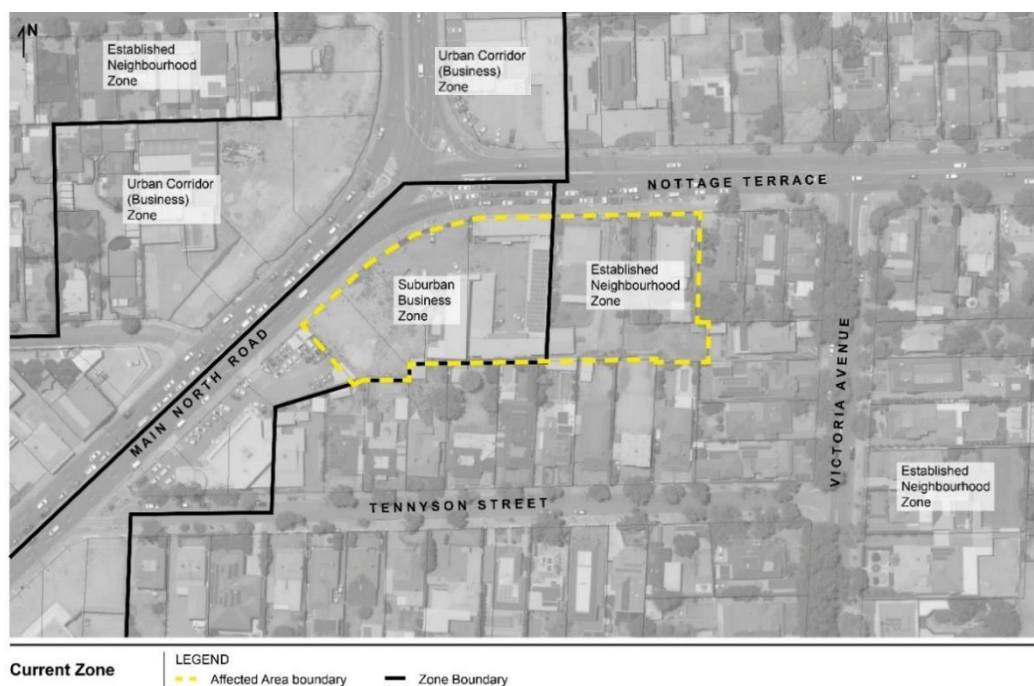
SUBMISSION TO THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for the owners of seven contiguous allotments located at 1,3 and 5 Nottage Terrace and 43 Main North Road, Medindie, described as:

- Allotment 98 on Certificate of Title 5761/575;
- Allotment 99 on Certificate of Title 5761/569;
- Allotment 8 on Certificate of Title 5106/255;
- Allotment 15 on Certificate of Title 5106/256;
- Allotment 7 on Certificate of Title 5798/222;
- Allotment 3 on Certificate of Title 5228/569; and
- Allotment 2 on Certificate of Title 5228/570.

Together referred to as “the site” and demonstrated in **Figure 1**.

Figure 1 Site and Current Zoning



In April 2021 a Code Amendment was initiated for the site. The Code Amendment sought to rezone the site from the Suburban Business Zone and Established Neighbourhood Zone to the Urban Corridor (Business) Zone (Urban Corridor Zone). Despite support from the State Planning Commission, the Minister for Planning rejected the Code Amendment. Had the Code Amendment been approved, it would have provided a zoning consistent with the other corridor zoning on Main North Road and ability to undertake a broader range of future land uses including affordable housing.

Considerable investigations were undertaken for the previous Code Amendment that confirmed:

- The site was afforded access to existing infrastructure that could accommodate future development and increased density that would be facilitated by the Urban Corridor Zone;
- Policies in the Planning and Design Code would manage/mitigate perceived impacts from increased building height including protecting privacy and access to natural light; and
- The rezoning would have minimal impact on the Established Neighbourhood Zone and Historic Area Overlay confirmed in the Heritage Report prepared by Dash Architects (**enclosed**).

Despite Commission support and acknowledgement by the Minister of the value of the site as a “strategic infill site”, the Code Amendment was refused arising from the Minister’s concerns paraphrased below (letter **enclosed**):

...the proposed rezoning of the two allotments currently within the Established Neighbourhood Zone, and subsequent removal of the Historic Area Overlay from these properties (including demolition of a Representative Building), would have created a detrimental impact on the heritage values of the broader historic area.

...concerned about the ad hoc nature of the proposed rezoning in the context of the broader corridor, noting that rezoning of the affected area would likely trigger further Code Amendment requests and result in the uncoordinated redevelopment of a highly strategic infill area.

In summary, the Minister’s concern as to the “ad-hoc nature” of the proposed Code Amendment might most appropriately be addressed by the Commission noting the identified and acknowledged benefits of rezoning the site in the Greater Adelaide Regional Plan (GARP) providing for a strategic approach to rezoning of relevant parcels of land.

The Discussion Paper (Discussion Paper) on the GARP:

- Predicts that Adelaide will experience considerable growth over the next 30 years;
- There will be a need for up to 300,000 new dwellings;
- Housing access and affordability needs to be addressed. The Discussion Paper notes that other types of housing – the ‘Missing Middle’ – that offer affordable, well-designed and well-located options for our changing demographics is needed. Addressing the Missing Middle means providing more affordable housing choices in inner metro areas; and
- Corridors and strategic infill sites are being looked at for opportunities to provide greater uplift and densities to deliver the predicted growth.

The site is a prime example of an inner metro site that can deliver housing in response to changing demographics and affordability, along with providing local services to support the local community.

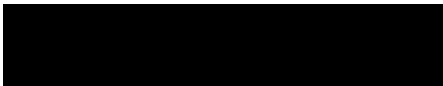
Through the GARP, the opportunity exists to investigate the site together with the broader road corridor as a growth area. Consideration of a broader rezoning in the locality is supported. Doing this would enable the broader area to be looked at as a strategic corridor to deliver the outcomes sought by the GARP and address the concerns of the Minister, including:

- Providing a consistent zone to the whole of the Main North Road corridor;
- Provide opportunities to enable increased densities on the corridor and encourage a range of land uses (residential and non-residential);
- Encourage development of affordable housing models; and
- Deliver community services that will serve the needs of the broader community, aligning with the concept of 'living locally'.

In any event, consideration should be given to identifying the site in the GARP as a strategic infill site and assigned appropriate future rezoning and land use that supports future development to deliver the outcomes sought by the GARP (i.e. affordable housing).

Thank you for your consideration of this submission.

Yours sincerely,

A solid black rectangular box used to redact the signature of the sender.

Emily Nankivell
Associate Director

Encl Minister's letter dated 4 April 2023
 Heritage Report by Dash Architects dated 12 November 2021



**Government
of South Australia**

**Minister for Trade and
Investment**

**Minister for Housing and
Urban Development**

Minister for Planning

GPO Box 11032
ADELAIDE SA 5001

T: (08) 8235 5580

E: ministerchampion@sa.gov.au

23EXT0037

YS Super Investments Pty Ltd
C/- Ms Belinda Monier
Senior Consultant
Future Urban

By email: belinda@futureurban.com.au

Dear Ms Monier

I write to advise that under section 73(10)(f) of the *Planning, Development and Infrastructure Act 2016* (the Act), I have considered the Scotty's Corner Code Amendment (the Code Amendment) and have resolved to decline the proposed amendment to the Planning and Design Code (the Code).

Whilst I acknowledge the value of the land as a strategic infill site, I have formed the view that the proposed rezoning of the two allotments currently within the Established Neighbourhood Zone, and subsequent removal of the Historic Area Overlay from these properties (including demolition of a Representative Building), would have created a detrimental impact on the heritage values of the broader historic area.

Furthermore, I am concerned about the ad hoc nature of the proposed rezoning in the context of the broader corridor, noting that rezoning of the affected area would likely trigger further Code Amendment requests and result in the uncoordinated redevelopment of a highly strategic infill area.

I note that the Town of Walkerville (the Council) in its submission on the Code Amendment expressed a willingness to accept a four-storey development on the Scotty's Motel site. This being the case, I have requested that Council work with the Proponent to enable a development of this scale, which can be achieved through performance planning within the existing zone.

In addition, I have requested Council actively pursue strategic planning for the Main North Road corridor to underpin a future, Council-led Code Amendment to introduce a consistent, more contemporary higher-density zone across the area.



OFFICIAL

For further information, please contact Ms Nadia Gencarelli, Team Leader – Code Amendments, Planning and Land Use Services, on [REDACTED] or via email at:

Yours sincerely

[REDACTED]

Hon Nick Champion MP
Minister for Planning

/ / 2023

Cc: Ms Kiki Cristol, Chief Executive Officer, Town of Walkerville [REDACTED]

“Scotty’s Corner” Code Amendment

Historic Character Impact Report

DA214082 Issue –

12.11.21

1.0 Introduction

DASH Architects has been engaged by Future Urban to assess the Historic Character Impacts arising from the proposed “Scotty’s Corner” Code Amendment.

This report has been prepared by Jason Schulz, Director of DASH Architects. I have nearly 30 years experience as a heritage architect, with particular expertise in heritage and character assessments, heritage policy and impact assessments. I also have a detailed knowledge of the State’s planning system, including relevant legislation (Planning Development and Infrastructure Act & Regs, SA Heritage Places Act & Regs and the Planning and Design Code).. This collective expertise has afforded me the following past and present postings:

Present

- State Government Heritage Reform Advisory Panel (joint AGD and DEW)
- Australian Institute of Architects (SA Chapter) Heritage Committee.

Past

- South Australian Heritage Council (2011 to 2021)
- Local Heritage Advisory Committee (2011 through to its disbandment in 2016)
- Deputy Presiding Member, City of Unley Development Assessment Panel
- Presiding Member, City of Adelaide Urban Design Advisory Committee
- City Centre Design Review Panel (ODASA)
- City of Adelaide Heritage Advisor, and
- Salvation Army Advisory Board.

DASH Architects was also called upon by the Department for Infrastructure and Transport to assist in drafting the Practice Advisory Guidelines for the Planning and Design Code to assist with the designing and assessment of new development within Historic Area Overlays. I played a lead role in this process.

*dash*architects

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ABN 82 059 685 059

2.0 Code Amendment

The land affected by the proposed Code Amendment is identified in the below image, and includes 1-5 Nottage Terrace and 43 Main North Road, Medindie (Affected Land). This land is currently Zoned both Suburban Business and Established Neighbourhood, the latter including a Historic Area Overlay. The Code Amendment seeks to re-zone this land Urban Corridor (Business) Zone, similar to that further north, and also across Main North Road.

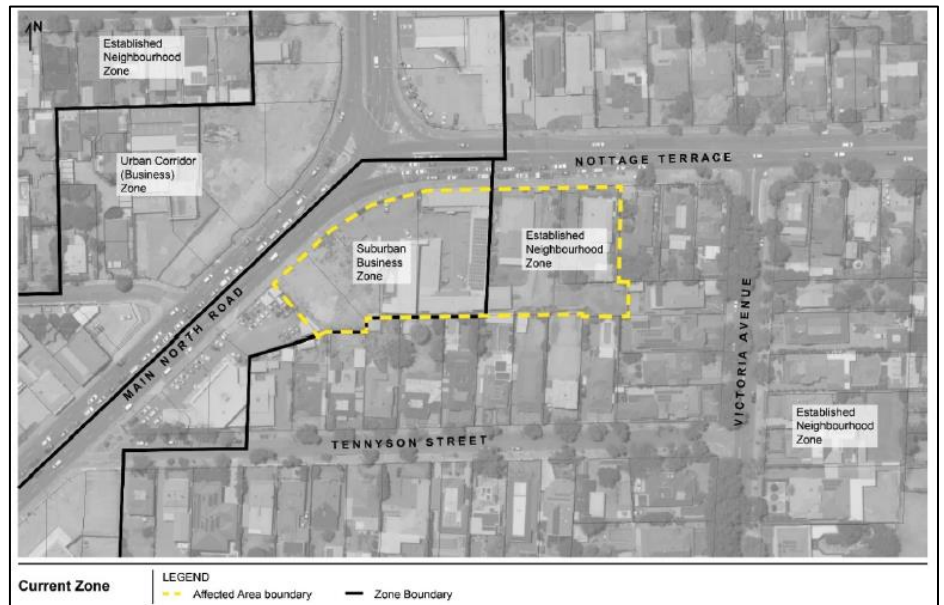


Figure 1: Proposed Code Amendment Affected Land. Source: Future Urban

The Affected Land will interface to the south and east with the Medindie Historic Area Overlay (Walk2), while the eastern portion will be located across Nottage Terrace from the Medindie Gardens Historic Area Overlay (Pr11).

Policy changes associated with the proposed Urban Corridor (Business) Zone are outlined in detail within Future Urban's Code Amendment report, and include:

- Removal of the Historic Area Overlay protections to No's 3 and 5 Nottage Terrace,
- Amending permissible building heights from 3 Levels (Suburban Business Zone) to 6 Levels,
- Amend permissible building heights from 2 Levels (Established Neighbourhood Zone), to 6 Levels.

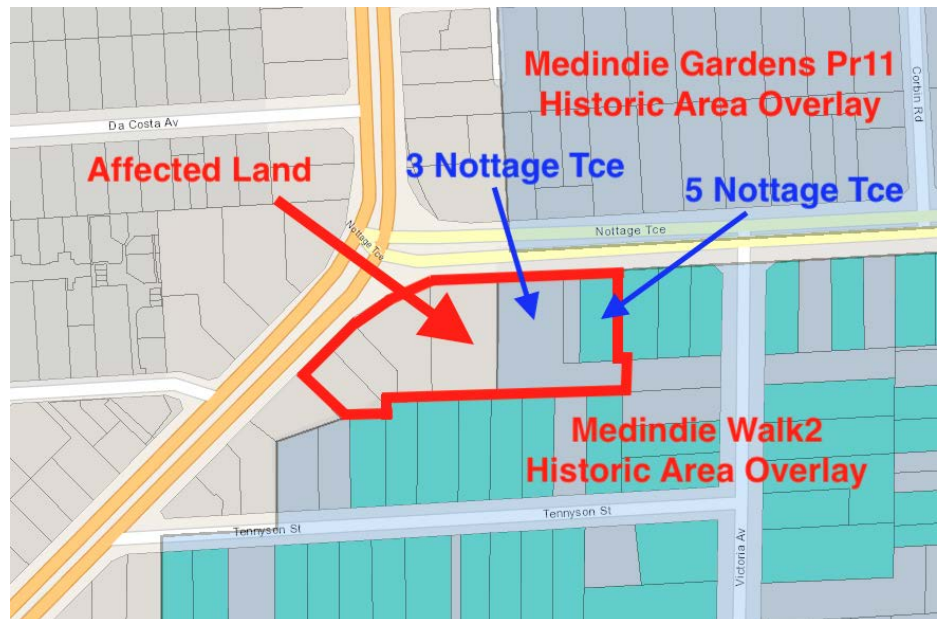


Figure 2: Surrounding Historic Area Overlays. Affected land boundary in red

3.0 Scope of Impact Assessment

The scope of this Historic Character Impact Assessment is to consider the following:

- Will the loss of two residential properties within the Established Neighbourhood Zone (one of which contains a representative dwelling) have broader negative/detrimental impacts upon the Established Neighbourhood Zone and/or Historic Area Overlay as it relates to the suburb of Medindie and the Walkerville Council Area.
- Will the anticipated height and scale proposed in the Code Amendment have a negative/detrimental impact upon the Established Neighbourhood Zone and/or the Historic Area Overlay (including adjoining representative dwellings in Tennyson Street and Victoria Avenue)?
- General observations regarding historic character and/or heritage (if relevant)

Importantly, my assessment does not extend to amenity impacts of potential development on the Affected Land on the adjoining Neighbourhood Zone. Such matters are neither heritage nor historic character considerations. Further, there are a significant number of provisions within the Planning and Design Code that speak to managing such impacts that cannot reasonably be considered in the absence of a specific development proposal for the site. While the Code Amendment document prepared by Future Urban includes massing studies for the site, these are not in themselves development proposals. Rather, they are building envelop studies for the purposes of assisting the nature of policy reform sought.

4.0 Historic Character Impact Assessment

4.1 Loss of Demolition Controls

4.1.1 Policy Framework

No's 3 and 5 Nottage Terrace (within the Affected Land) are currently zoned Established Neighbourhood, with a Historic Area Overlay (HAO). The Desired Outcome (DO1) of the HAO seeks:

DO1: Historic themes and characteristics are reinforced through conservation and contextually responsive development, design and adaptive reuse that responds to existing coherent patterns of land division, site configuration, streetscapes, building siting and built scale, form and features as exhibited in the Historic Area and expressed in the Historic Area Statement.

Performance Outcome PO7.1 of the HAO notes:

PO7.1: Buildings and structures, or features thereof, that demonstrate the historic characteristics as expressed in the Historic Area Statement are not demolished, unless:

- (a) the front elevation of the building has been substantially altered and cannot be reasonably restored in a manner consistent with the building's original style, or*
- (b) the structural integrity or safe condition of the original building is beyond reasonable repair.*

These policies speak to providing demolition controls over places that display the attributes expressed within the Overlay's Historic Area Statement (HAS).

The Medindie Historic Area Statement (Walk2) identifies the following attributes of recognised importance to the local area:

Eras, themes and context	Very-low and low density residential. 19th Century and early 20th Century.
Allotments, subdivision and built form patterns	Predominantly detached dwellings on large, wide allotments. Allotment sizes and building setbacks vary throughout the policy area, although there are patterns established in individual streets.
Architectural styles, detailing and built form features	Range of architectural styles and dwelling types from the late 19th Century and early 20th Century periods including early Victorian, high Victorian, Edwardian, Classic Revival and large bungalows, all set within large landscaped garden settings that enhance the presentation of the dwellings.

Building height	Predominantly single storey. Two storey additions to the rear of buildings or within the roof space with single storey appearance at the street. Two storey dwellings found on Robe Terrace and on larger sites with setbacks
Materials	Residences within this area vary in material application. Residences mostly constructed in locally sourced sandstone or bluestone, corrugated galvanised iron roofs and verandahs with cast iron lacework. Consistent early stone and brick dwellings on large sites with wide frontages to public roads.
Fencing	There is a distinctive lack of high, solid fencing and/or the use of open design of large gates to access long driveways has enabled the principal elevation of the historic homes and landscaped grounds to be visible from the public roads.
Setting, landscaping, streetscape and public realm features	Reasonably well established pattern of development, with regular spacing between buildings, front setbacks and roof pitches. Low-density residential development, with predominantly detached dwellings on allotments that are generous in width. Regular spacing between residential buildings that is primarily achieved through consistent setbacks from each side boundary. Formal avenues and regular spacing of street trees along road verges also make a positive contribution to the amenity of the area.
Representative Buildings	Identified - refer to SA planning database.

Of the two sites currently within the HAO, No 5 has been identified as a representative building, while No 3 has not.

The proposed Code Amendment would remove the demolition controls afforded to No 3 and 5 Nottage Terrace by the current Historic Area Overlay. There are a number of relevant factors to consider when assessing the impacts to the remaining Established Neighbourhood Zone and/or Historic Area Overlay. I will consider these systematically.

4.1.2 Consistency with Historic Area Statement

3 Nottage Terrace, Medindie

No 3 has not been identified as a Representative Building. The extent to which the existing dwelling displays the attributes identified by the HAS, and in turn is afforded some demolition protections is highly problematic as it is largely concealed behind a large masonry wall to the street boundary. The only portion of the dwelling visible from the surrounding public realm is the roof.

Figure 3 below is taken from the northern side of Nottage Terrace as very little of the building is visible from the southern footpath side. Figure 4 has been sourced from Google Street View. These images are taken from a camera mounted high on the roof of a vehicle, enabling additional views over the front

wall. This image shows additional detail not otherwise visible from the public realm.

On this basis I make the following observations:

- A small section of wall is visible from the other side of Nottage Terrace over the tall front wall (upper right, Figure 3). This section of wall appears to be sandstone, and incorporates an upper render string course and corbels. This detailing is typical of Victorian Villas (c1900), and are visible on the adjacent villa at No 5.
- The roof appears to have been modified to incorporate a large gable, a feature more consistent with a bungalow (c1920s). Its roof pitch, however, is not consistent with that of a bungalow (which would be less steep). Rather, it retains a steeper pitch more consistent with a villa.
- There is a later masonry infill under this gable, of a somewhat awkward proportion. This infill is very inconsistent with the noted eras and themes of importance.
- The profile and proportion of the roof behind the gable is again consistent with that of a villa, however it too appears to have been modified. A traditional villa roof would have been corrugated iron, and incorporated a ridge line parallel to the street (concealing a box gutter behind as part of an 'M' roof configuration). The verandah would have been a discrete element that sat under the eave of the main roof (as opposed to being integrated).
- The villa's original open verandah appears to have been infilled (refer Figure 3).

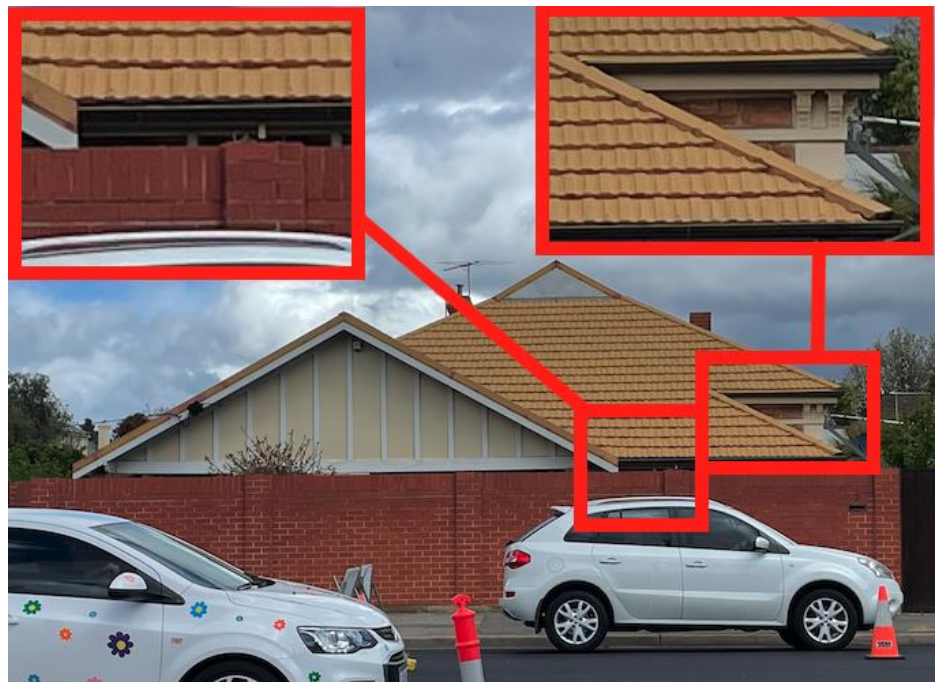


Figure 3: 3 Nottage Terrace, Medindie

Note 1: A building being obscured by a boundary wall is not necessarily reason in itself to conclude a diminished character contribution, however in this instance it is considered relevant as:

- The wall is notably tall and obscures most of the building
- The wall has been installed for acoustic reasons due to the proximity to the intersection. Recent road widening associated with intersection means it is unlikely to be removed in the foreseeable future
- Analysis of visible features appears to indicate a diminished integrity anyway.



Figure 4: 3 Nottage Terrace, Medindie. Source: Google Street View, Aug 2016

I suspect the dwelling at No 3 Nottage Terrace was originally a villa, constructed c1900, that was extensively modified to present as a bungalow. The era of these changes is difficult to estimate. The large gable may date c1930, and the infill under perhaps c1990. The compromises to the integrity of both styles means that it is unlikely to be a good representation of either. It is for these reasons I suspect Council had not previously identified the dwelling as being a Contributory Item (now Representative Building).

This, however, is somewhat of a moot point, as the dwelling is mostly concealed behind a large masonry wall (Note 1), and as a result contributes very little to any prevailing historic character as evident by the below assessment table.

Eras, themes and context	The building appears to be a c1900 villa that has been modified with bungalow influences	Poor
Allotments, subdivision and built form patterns	Detached dwelling.	Consistent
Architectural styles, detailing and built form features	The building appears to be a c1900 villa that has been modified with bungalow influences. Building largely concealed behind tall street boundary wall	Poor
Building height	Wall height is consistent but roof form modified to distort overall height and general proportion	Below Average
Materials	Most visible materials are later modifications (contemporary roof tiling)	Below Average

Fencing	Tall wall is at odds with noted "distinctive lack of high, solid fencing"	Poor
Setting, landscaping, streetscape and public realm features	Very little landscaping is visible	Poor
Representative Buildings	Not a Representative Building	Poor

The extent of probable modification noted above, general poor current character contribution, and lack of consistency with the attributes identified in the HAS, means that PO7.1 will likely afford little demolition protection to No 3 Nottage terrace.

5 Nottage Terrace, Medindie

No 5 Nottage Terrace has been identified as a Representative Building. Like No 3, it is largely concealed behind a tall street boundary wall. No 5 appears to retain higher integrity to No 3, showing a more traditional roof form, upper stonework to walls, and traditional eave. The dwelling appears to retain a verandah that is consistent with the original style, but it too appears to have been modified at its eastern end, where an addition has been constructed forward of the dwelling.



Figure 5: 5 Nottage Terrace, Medindie



Figure 6: 5 Nottage Terrace, Medindie. Source: Google Street View, Aug 2016

Eras, themes and context	The building appears to be a c1900 villa that with minor alterations and additions to front left.	Good
Allotments, subdivision and built form patterns	Detached dwelling.	Good
Architectural styles, detailing and built form features	The building appears to be a c1900 villa that with minor alterations and additions to front left. Building largely concealed behind tall street boundary wall	Consistent
Building height	Wall height is consistent	Consistent
Materials	Materials generally consistent but mostly concealed behind tall street boundary wall	Consistent
Fencing	Tall wall is at odds with noted "distinctive lack of high, solid fencing"	Poor
Setting, landscaping, streetscape and public realm features	Very little landscaping is visible	Poor
Representative Buildings	Has been identified as a Representative Building	Consistent

While No 5 Nottage Terrace is largely concealed from view, it retains sufficient integrity as to be generally consistent with the historic attributes identified by the HAS.

Overall Summary

While both No 3 and 5 Nottage Terrace have origins that date to the eras and themes spoken of in the HAS, No 3 has been substantially modified, and is unlikely to be afforded demolition protection under HAO PO7.1(a). This is also consistent with No 3 not having previously been identified as a Contributory Item (now Representative Building).

4.1.3 Character of Locality

The extent to which demolition will impact the historic character of a locality is also influenced by the integrity of that existing character, and the location of the proposed demolition within an Overlay. That is to say:

- demolition in an area of compromised integrity will likely have a lesser impact than an area that is highly intact
- demolition on the outer edge of the Overlay is likely to have lesser impact than within.

No 3 and 5 Nottage Terrace are located in the top north-west corner of the Medindie (Walk2) Historic Area Overlay (Figure 7). The only context of these sites to the remainder of the Overlay is those properties to the east along Nottage Terrace.

These sites are located within very close proximity to the major intersection of Nottage Terrace and Main North Road, with the former presently undergoing road widening to accommodate very large traffic flows.

The character of Nottage Terrace varies along its length, and is directly influenced by the proximity to the Main North Road intersection. Further east, the character is that of a very busy road flanked by early housing on either side. This changes as you approach the Main North Road intersection to the west. Front boundary walls of the interfacing dwellings become taller to mitigate traffic noise, and ultimately obscure most views of the buildings behind. The road and intersection widen, and traffic congestion increases, to ultimately dominate the character of the locality at the western end of Nottage Terrace.

The affect of this is that there is notably less overarching historic character to the western end of Nottage Terrace than the eastern end, and significantly less than the residential streets within the Overlay itself. I do not consider it unreasonable to state that there is nearly no historic character to the Affected Land, notwithstanding a portion currently accommodates a Historic Area Overlay.

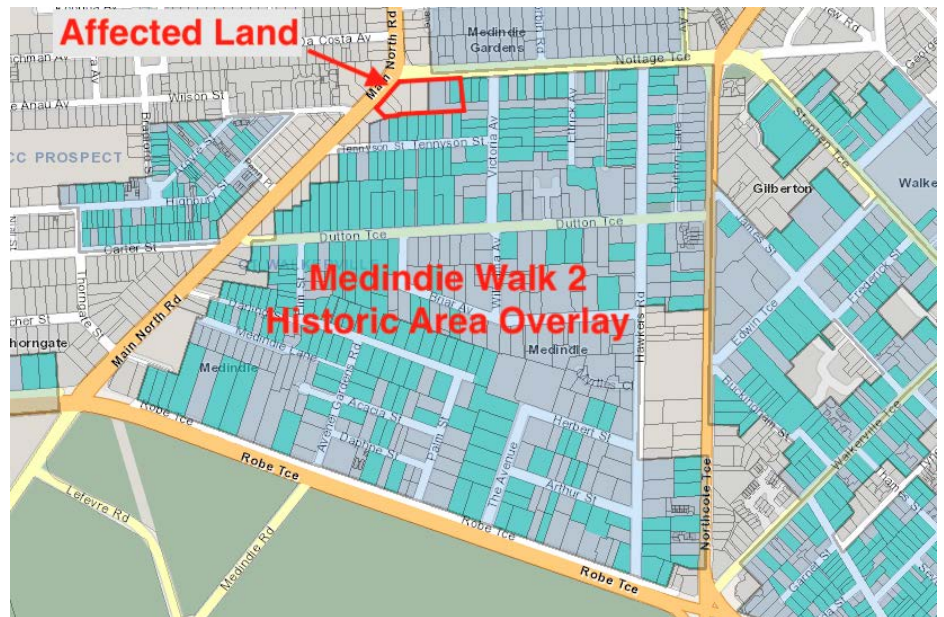


Figure 7: Affected Land within Historic Area Overlay



Figure 8: Nottage Terrace approaching Affected Land (left)



Figure 9: Nottage Terrace approaching Affected Land (left)

4.1.4 Summary

The removal of the Historic Area Overlay will remove the demolition protections otherwise afforded to No 3 and 5 Nottage Terrace, however as noted, such protection are unlikely to presently exist for No 3, as it stands in a compromised state of integrity. Accordingly, any impacts arising from the rezoning of these two sites on the Medindie (Walk2) HAO are realistically limited to those associated with the demolition of No 5 only.

The demolition of a dwelling that generally displays the attributes identified in the Historic Area Statement will adversely impact on the overall historic character of that Overlay. This is not disputed. The extent of such impacts, however, are heavily dependent on the context of the proposed demolition. No 5 is located on the outer corner of the Overlay, with limited context to the remaining historic character of the Overlay. The dwelling is largely concealed behind a tall masonry wall, that is unlikely to be removed due to its role in buffering the acoustic and amenity impacts associated with the major nearby intersection of Nottage Terrace and Main North Road. There is very little prevailing historic character within the immediate vicinity of No 5, with the nearby intersection dominating most physical, visual and acoustic attributes.

On balance, I consider the impacts to the historic character of the Medindie (Walk2) HAO arising from the proposed removal of the protections to No 3 and 5 to be generally minimal.

4.2 Change in Height

The Affected Land is currently zoned Suburban Business Zone (western portion) and Established Neighbourhood Zone (eastern portion). These zones currently have a prescribed maximum height limit of 3 levels and 2 levels respectively. The Code Amendment seeks to rezone this land urban Corridor (Business) Zone, with a prescribed maximum height limit of 6 levels.

In considering the impacts of this change in height limited I observe the following:

4.2.1 Broader Zoning Context

Main North Road is one of the City's major arterial thoroughfares, accommodating large volumes of traffic and forming an important transport corridor to the north. The vast majority of land fronting Main North Road between the Parklands (to the south) and Regency Road (to the north) is zoned urban Corridor (Business) Zone, with a height limit of between 4 and 5 storeys. The exceptions to this are the Suburban Activity Zone to the northern end, and the Suburban Business Zone (that includes a portion of the Affected Land) that separates the Medindie (Walk2) HAO from Main North Road.

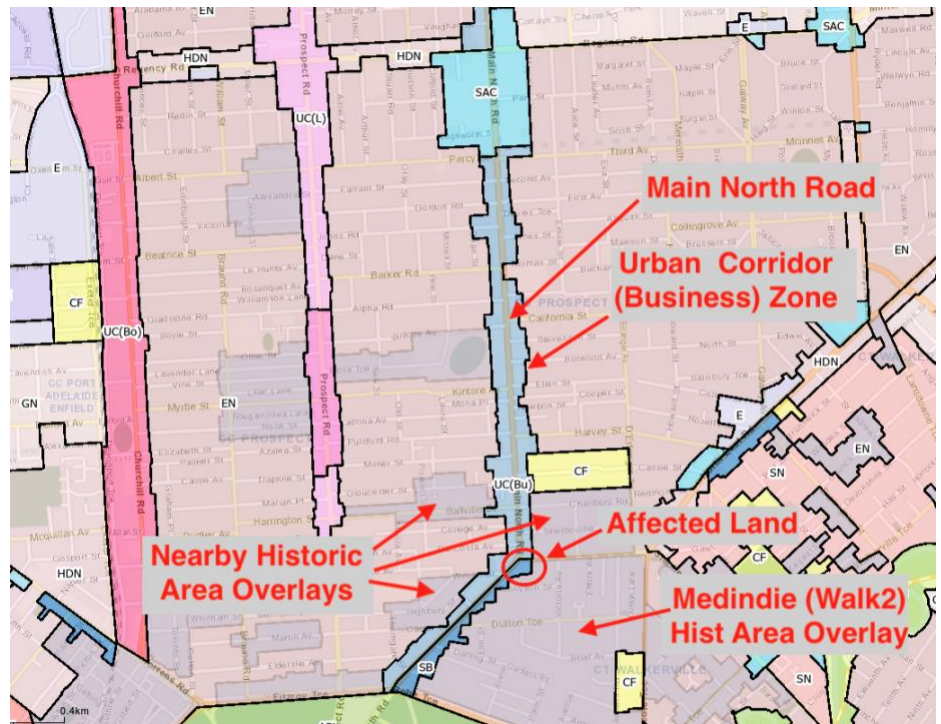


Figure 10: Broader Zoning Context

As is common for major roads through inner suburbs, interfacing zones are regularly residential (Established Neighbourhood), with many of those closest to the City having a historic character, and being subject to a Historic Area Overlay (HAO). Within the slightly broader context of the Affected Land there are four Historic Area Overlays that interface with Main North Road's zoning, including Medindie (Walk2). With the exception of Medindie (Walk2), these interfacing zones are all Urban Corridor (Business), with height limits of 4 storeys. Land to the western side of the Nottage Terrace intersection with Main North Road (that does not interface with a Historic Area Overlay) has a 5 storey height limit.

Within this context, the zoning and height limits of the land between the Medindie (Walk2) HAO and Main North Road seems slightly anomalous.

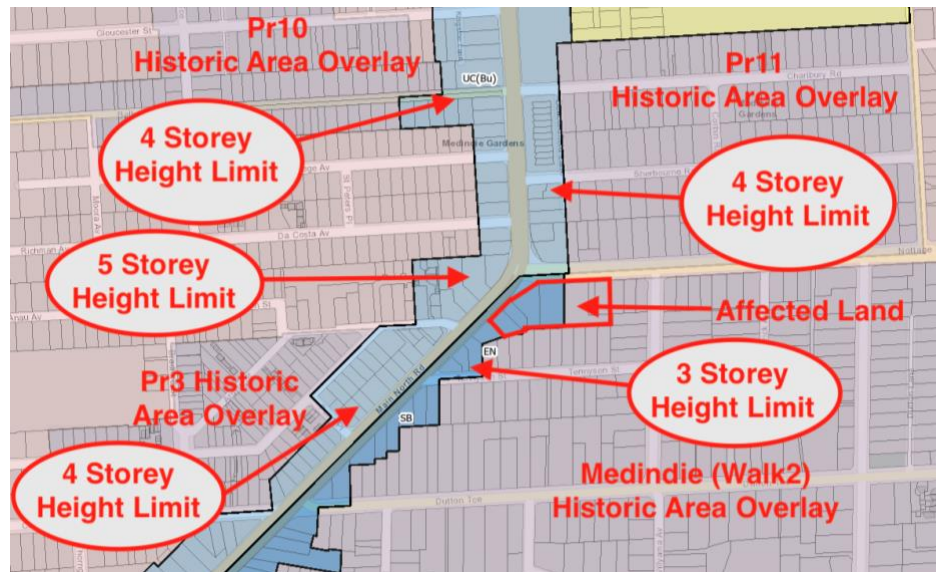


Figure 11: Interfacing Height Limits

4.2.2 Comparable Context

A comparison to other arterial roads height limits to interfacing Historic Area Overlays the following is observed:

- Payneham Road: interfacing height limits of 2 storeys
- Magill Road: Interfacing height limits between 2 and 6 storeys
- Prospect Road: 3 to 4 storeys
- Henley Beach Road: 6 storeys
- Unley Road: 5 storeys

Other comparable interfaces include the roads surrounding the Adelaide Park Lands, that regularly interface with Historic Area Overlays, and include:

- Fullarton Road: 6 to 7 storeys
- Greenhill Road: 3 to 7 storeys

Note 2: The apartment development is 7 storeys to the Unley Road frontage and will step down in scale as it interfaces with the adjacent Historic Area Overlay. These lower scale components of the development are yet to be constructed.

In summary, it is not uncommon for height limits of zones on major roads interfacing with Historic Area Overlays to permit a scale of development up to 4 to 7 storeys.

When considering the potential impact of the proposed increased scale on the character of the Historic Area Overlay I have also had regard to the recent apartment development at 244-248 Unley Road, Hyde Park. These apartments, that are nearing the end of construction and are 7 storeys in height, interface with the adjacent Un7 Historic Area Overlay (Note 2).



Figure 12: 244-248 Unley Road, Hyde Park, viewed from Unley Road



Figure 13: 244-248 Unley Road, Hyde Park, viewed from Unley Road



Figure 14: 244-248 Unley Road, Hyde Park, viewed from Hart Street within the Historic Area Overlay



Figure 15: 244-248 Unley Road, Hyde Park, viewed from Hart Street within the Historic Area Overlay

Note 3: It is noted that the development of 244-248 Unley Road was approved under the Development Act (and associated Council Development Plans), not the Planning Development and Infrastructure Act (and associated Planning and Design Code). The principles remain consistent however for the purposes of considering historic character impacts.

There is no question that the apartment complex (at 7 storeys) is notably taller than the historic dwellings within the Un7 Historic Area Overlay, however the context of these apartments is to Unley Road, not the Historic Area Overlay. The apartment complex is visible from within the Overlay, but as a backdrop to the historic built form.

The extent to which 'backdrop' built form can impact on the historic character of the overlay is clearly subjective. As noted above, there are many instances where large scale development is envisaged to interface with Historic Area Overlays. The Planning and Design Code provides policy guidance to manage and mitigate amenity impacts associated with these interfaces (as discussed in more detail below). None of these policies, however, speak to the development not being visible as a backdrop to the historic area, that I would contend is an envisaged consequence to the narrow zoning along major roads, and increased scale of permissible development. For these reasons I would consider the visual impacts of the development at 244-248 Unley Road on the Historic Area Overlay to be anticipated by the Planning and Design Code (Note 3).

I understand that the Code Amendment document prepared by Future Urban refers to the application of such policies including those associated with zone interfaces and visual amenity impacts.

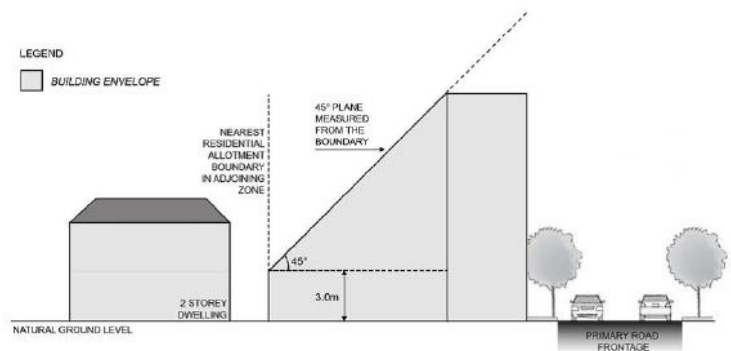
4.2.3 Relevant Policy Considerations

As identified above, it is not uncommon for major arterial roads to accommodate a narrow zoning along their length that permits a higher scale development to interfacing residential (Established Neighbourhood) Zones behind. The Planning and Design Code includes a range of provisions that seek to manage adverse impacts arising from these interfaces, including (but not limited to):

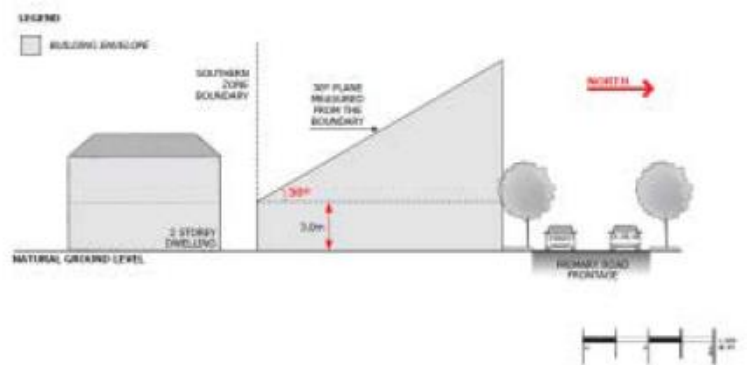
Urban Corridor (Business Zone)

- **PO2.4:** *Buildings set back from secondary street boundaries to contribute to a consistent established streetscape*

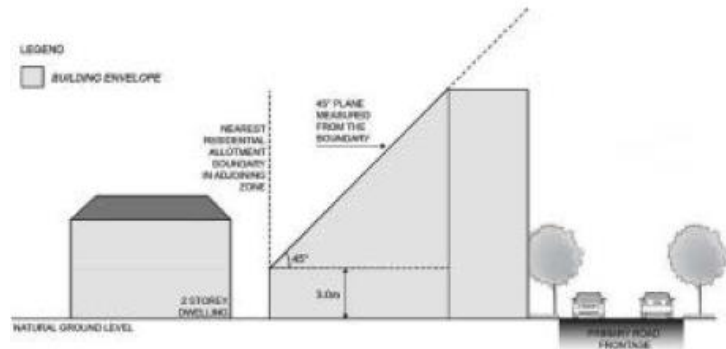
- **PO2.5:** Buildings set back from rear boundaries (other than street boundaries) to minimise impacts on neighbouring properties, including access to natural sunlight and ventilation.
- **PO3.1:** Building height consistent with the form expressed in the Maximum Building Height (Levels) Technical and Numeric Variation layer and the Maximum Building Height (Metres) Technical and Numeric Variation layer and positively responds to the local context including the site's frontage, depth, and adjacent primary corridor or street width.
- **PO4.1:** Buildings mitigate impacts of building massing on residential development within a neighbourhood-type zone.
- **DTS/DPF4.1:** Interface Height – Buildings constructed within a building envelope provided by:
 - (a) 45 degree plane measured from a height of 3 metres above natural ground level at the boundary of an allotment used for residential purposes within a neighbourhood-type zone as shown in the following diagram (except where this boundary is a southern boundary),



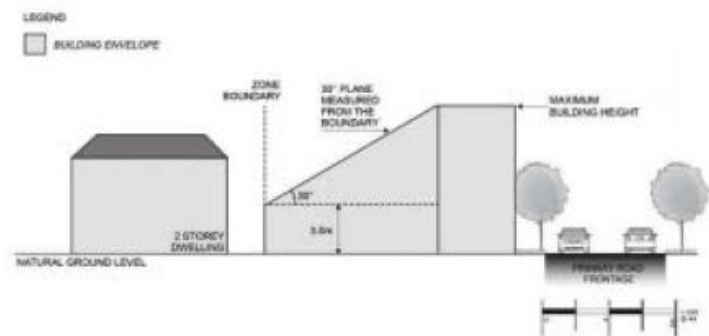
- (b) in relation to a southern boundary, 30 degree plane grading north, measured from a height of 3m above natural ground at the boundary of an allotment used for residential purposes within a neighbourhood-type zone as shown in the following diagram:



Buildings constructed within a building envelope provided by a 45 degree plane measured from a height of 3 metres above natural ground level at the boundary of an allotment used for residential purposes within a neighbourhood-type zone as shown in the following diagram:



Buildings constructed within a building envelope provided by a 30 degree plane measured from a height of 3m above natural ground level at the boundary of an allotment used for residential purposes within a neighbourhood-type zone as shown in the following diagram:



- **PO5.2:** Development on a significant development site (a site with a frontage to a primary road corridor and over 2500m² which may include one or more allotments) designed to minimise impacts on residential uses in adjacent zones with regard to intensity of use, overshadowing, massing and building proportions.
- **DTS/DPF 5.2:** Development that:
 - (a) is constructed within zone's Interface Building Height provision as specified DTS/DPF 4.1
 - (b) locates non-residential activities and higher density elements towards the primary road corridor
 - (c) locates taller building elements towards the primary road corridor.

Design

- **DO1:** *Development is:*
 - (a) *contextual - by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributes to the character of the immediate area*
 - (b) ...
- **PO15.1:** *The visual mass of larger buildings is reduced when viewed from adjoining allotments or public streets.*
- **PO16.1:** *Dwelling additions are sited and designed to not detract from the streetscape or amenity of adjoining properties and do not impede on-site functional requirements.*
- **PO22.2:** *The orientation and siting of buildings minimises impacts on the amenity, outlook and privacy of occupants and neighbours.*

In addition it is important to note that the Design Overlay provides a referral trigger to the Government Architects for *the erection of construction of a building that exceeds 4 building levels.*

While there are many other Code provisions that speak to managing impacts between zones of differing height limits, the above provides a good indication of the general intent. These provisions include:

- Contextual design responses to existing streetscapes
- Positive responses to local context
- Reducing the visual mass of large buildings
- Responding positively to built environment and character of the immediate area.

Importantly, the provisions do not suggest development in adjoining zones should not be visible. Urban Corridor (Business) Zone PO4.1 speaks to managing amenity and “massing” impacts of adjacent taller development through setback angles. Further, this provision primarily addresses amenity, rather than character.

4.2.4 Possible Views

Having inspected the locality, I consider it reasonable to assume that a development on the Affected Land to a scale of 6 storeys will likely be visible from sections of Victoria Avenue and Tennyson Street, Medindie (ie within the Historic Area Overlay). These views are most likely either ‘glimpses’ between dwellings, or as a ‘backdrop’.

While such ‘visual impacts’ are probably less likely with the current zoning (that envisages development to a 3 storey height limit), they are neither uncommon or unanticipated in many other Historic Area Overlays across the inner suburbs.

Further, I do not consider such ‘glimpses’ or ‘backdrops’ to necessarily be detrimental to the historic character of an HAO. To suggest such, or to contend that development height need be limited in such instances, is to bring into

question the permissible heights of almost all of the comparable circumstances identified in Section 4.2.2 above.

4.2.5 Summary

Main North Road is a major arterial road that is largely zoned Urban Corridor (Business) within the 3km stretch from the Adelaide Parklands to Regency Road, with height limits typically 4 storeys. Within the immediate proximity of the Affected Area this increases to 5 storeys. The proposed Code Amendment seeks to rezone the Affected Land to accommodate height limits of 6 storeys.

It is not uncommon within the inner suburban ring to have long, narrow zones along major arterial roads supporting increased development height while still interfacing with Neighbourhood Zones (with Historic Area Overlays). The context of such taller scale development in such instances is typically the arterial road along which they are located, rather than the HAO behind. While these developments are likely to be visible from within the HAO, they form a visual 'backdrop' to the zone, rather than an integral feature.

The Planning and Design Code seeks to manage potential impacts between zones of differing height limits with a series of Desired and Performance Outcomes that primarily speak to amenity, rather than impacts to historic character. For these reasons I contend that the Code anticipates taller development along arterial roads to be visible as a 'backdrop' to historic areas, provided amenity and contextual design matters are appropriately managed and mitigated. A referral to the Government Architects is also triggered for development over four storeys to provide greater rigour to the assessment of these important design matters.

While the increase in permissible height on the Affected Land proposed by the Code Amendment will likely result in a greater visible 'backdrop' to the Medindie (Walk2) HAO, such outcomes are:

- Consistent with many other HAOs within close proximity of major roads
- Consistent with the prevailing zoning and permissible building heights along Main North Road within the broader vicinity of the Affected Land, and
- Generally anticipated by the Planning and Design Code.

4.3 General Observations

In preparing this Historic Character Impact Assessment I was instructed to review and have regard to the report prepared by Council's Heritage Advisor, FPH Heritage + Architecture (by Douglas Alexander).

The approach to my assessment, and its conclusions differ from the FPH report in several notable ways. While it is not my intention to identify each of these

occurrences, I do provide the following high-level commentary to clarify some of our differing approaches and conclusions.

Gateway

The FPH report stated the western end of Nottage Terrace was a “gateway” to Walkerville. I disagree. Nottage Terrace is the outer edge of a portion of the Town of Walkerville. The eastern end of Nottage Terrace, at its intersection with Northcote Terrace, is more appropriately considered the suburb’s gateway from this side. The Council has erected a sign to state as such.



Figure 16: ‘Gateway’ to Walkerville (corner of Nottage and Northcote Terraces). Source: Google Maps

Character of Nottage Terrace

The FHP report considers Nottage Terrace to have a high degree of historic character, and does not differentiate any change along its length in response to the intersection with Main North Road, and the tall boundary walls to the street frontage. I acknowledge that Nottage Terrace has some historic character to its eastern end, however this diminishes towards its western end in the proximity of the intersection and the Affected Land.

3 Nottage Terrace

The FPH report classified the dwelling at 3 Nottage Terrace as a bungalow, and consistent with the Historic Area Statements for the Overlay. I disagree. The original building on the site was most likely a villa, that was partially modified to incorporate a large ‘bungalow-like’ gable, before being further modified. It stands in a highly compromised state of integrity.

Proximity within Overlay

The FPH report does not appear to delineate any variance in the historic character across the Overlay due to localised circumstances. For example, it considers the historic character along the length of Nottage Terrace to be generally uniform and to a high standard consistent with the Historic Area Statements. I disagree. The historic character of Nottage Terrace is clearly less than, say, Victoria Avenue or Tennyson Street. Further, I consider the historic character of the western end of Nottage Terrace to be less than that at the eastern end, for reasons noted.

Building Envelope Studies

The FPH report appears to assess the potential impact of increased height within the Affected Area on the character of the interfacing Overlay by undertaking a development assessment of the building envelope studies provided in the Future Urban Report. These studies are not development proposals, but rather visual representations of general permissible heights envisaged for the Affected Area. I remain unclear of the merit of undertaking a development assessment of these building envelopes in understanding the potential impacts to the historic character of the interfacing overlay.

Further Incursions

The FPH report states that any authorisation of the proposed Code Amendment *“will undoubtedly be a catalyst for future incursions, with further loss of character, especially for the retained Representative Buildings at 7, 9 and 11 Nottage Terrace”*. This concern is pure supposition and not relevant to the assessment of historic character impacts arising from this Code Amendment.

5.0 Summary

If approved, the proposed Urban Corridor (Business) Zone would amend building scale fronting the intersection of Main North Road and Nottage Terrace from three storeys to six. This scale of development along a major arterial road is neither inconsistent with Main North Road, or other inner suburban arterial roads in the City, many of which similarly interface with Historic Area Overlays behind.

It is not uncommon within the inner suburban ring to have long, narrow zones along major arterial roads supporting increased development height while interfacing with Historic Area Overlays behind. Such corridor zones regularly support up to 7 storeys. The Planning and Design Code dedicates considerable policy to managing the impacts of such scale differential on the amenity of surrounding residential areas.

The Code also places considerable emphasis on an appropriate contextual design response for such sites, including a Government Architect referral for any proposals over four storeys.

If built to the permissible height limits, it appears likely that development on the Affected Land will be visible from some locations within the Medindie (Walk2) Historic Area Overlay, along Victoria Avenue and Tennyson Street. Such views will either be ‘glimpses’ between existing buildings, or across rooftops of existing buildings. Such views are, however, neither uncommon, nor unanticipated in many other Historic Area Overlays across the inner suburbs. In this instance, the context of these larger scale developments is to the major arterial roads to which they front, not the Historic Area Overlays from which they form a backdrop to. To suggest, or contend that development height in such corridor zones need be limited in such circumstances is to bring into question the permissible height limits of many Urban Corridor Zones within inner suburban areas.

The Code Amendment will see the removal of the Historic Area Overlay from two properties: No 3 and 5 Nottage Terrace. The Historic Area Overlay affords demolition protection for places that display important historic attributes as identified within the relevant Historic Area Statement. Having assessed both properties it appears that such protections are likely only afforded to No 5 Nottage Terrace, as No 3 stands in a highly compromised state of integrity.

The potential demolition of No 5 Nottage Terrace will have an adverse impact on the historic character of the locality, however such impacts need to be considered in the context of the locality within which they occur. The character of the western end of Nottage Terrace is dominated by its intersection with Main North Road. Residential development at this end is concealed behind tall boundary walls to the street, to mitigate noise and amenity issues associated with the intersection.

Further, the Affected Area is located at the outer corner of the Medindie (Walk2) Historic Area Overlay, where any impacts to the prevailing historic character will be generally less than, for example, the removal of a dwelling along Tennyson Street or Victoria Avenue.

For these reasons, while the removal of No 5 Nottage Terrace will have an adverse impact on the historic character of the locality, such impacts are considered to be generally minimal.

DTI:PlanSA Submissions

From: David Petruzzella [REDACTED]
Sent: Monday, 6 November 2023 9:06 AM
To: DTI:PlanSA Submissions
Cc: Chris Buttignol; Grazio Maiorano
Subject: GARP Discussion Paper Submission - Evanston Gardens
Attachments: 231030 Evanston Gardens Submission on GARP_V2 (1).pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Good Morning,

Submission regarding the 'Greater Adelaide Regional Plan – Discussion Paper' attached on behalf of Metro Homes.

Please get in touch if you have any questions.

Kind Regards,



David Petruzzella
Senior Consultant
[REDACTED]

27 Halifax Street
Enter via Symonds PI
Adelaide SA 5000
08 8333 7999

Kaurna Country

My working hours are
Monday to Friday 8:30am – 5:00pm

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3 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Evanston Gardens

URPS acts for Metro Homes, which has an interest in the identified land.

The Discussion Paper has been released for community and industry comment. The Paper presents key considerations and trends that will need to be considered in the future GARP. We commend the State Planning Commission for the work undertaken in preparing this Paper and thank you for the opportunity to provide feedback.

Affected Area

The Affected Area / Area of Interest is illustrated in Figure 1. It contains eighteen allotments totalling approximately 46 hectares. This land is generally used for rural residential purposes due to the relatively small allotment sizes (averaging 2.5ha each) and lack of affordable water.

A portion of the land is in the Deferred Urban Zone, which has been set aside to provide land for future urban growth. The remainder is in the Rural Zone where a four-hectare minimum allotment size applies via a 'TNV' (Figure 2).

The land abuts the Orleana Waters development, which is east of Coventry Road. That development is well progressed as shown in Figure 1 and will ultimately result in allotments extending to Gordon Road. The development has enjoyed strong demand, with stage 12 currently selling.

Renewal SA owns land east of Orleana Waters. That land is largely zoned 'Master Planned Neighbourhood' and will eventually be developed for residential purposes. The Main North Road frontage of that land is zoned Open Space.

The Affected Area is considered best suited to accommodating residential development given projected population growth and demand for housing in this region.

Figure 1: Area of Interest – Evanston Gardens

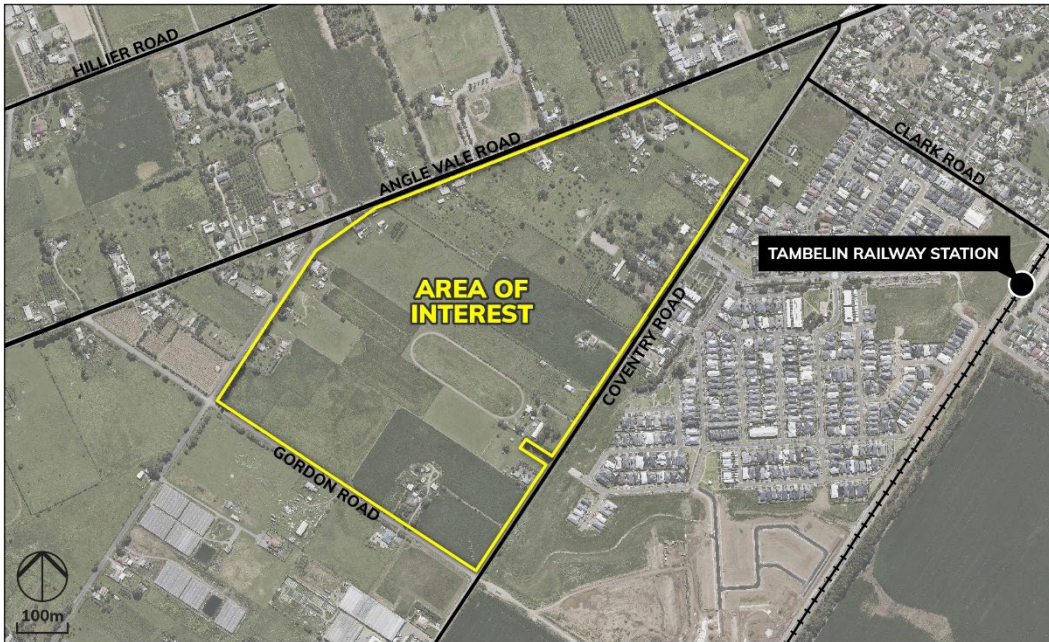


Figure 2: Area of Interest – Zoning

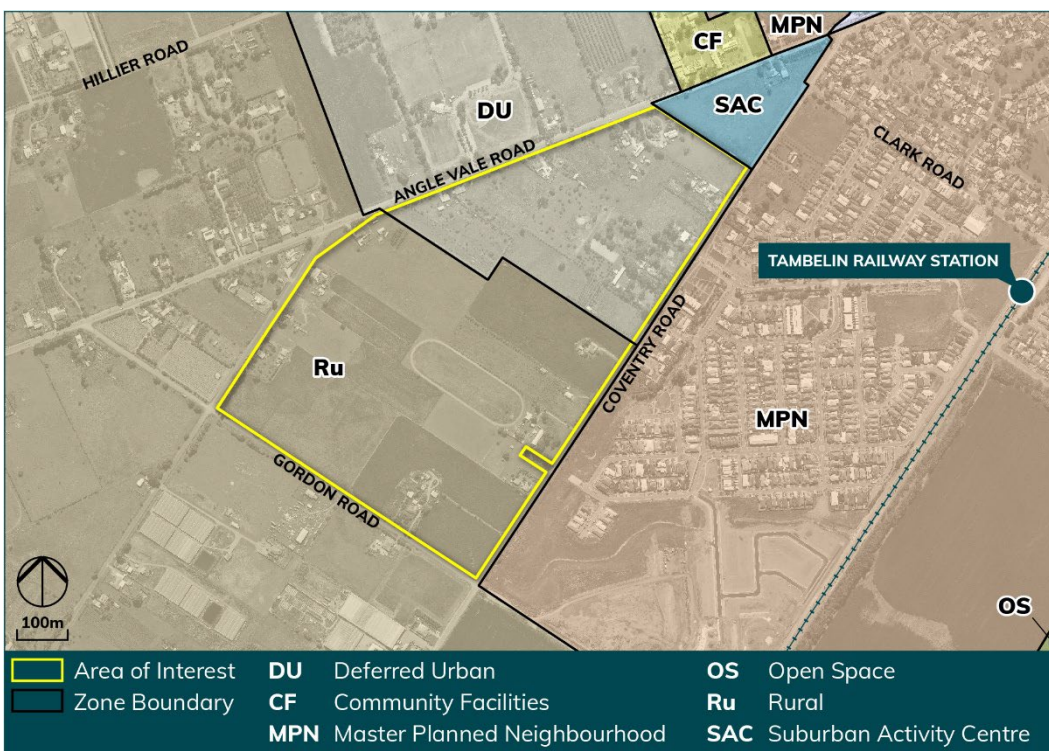
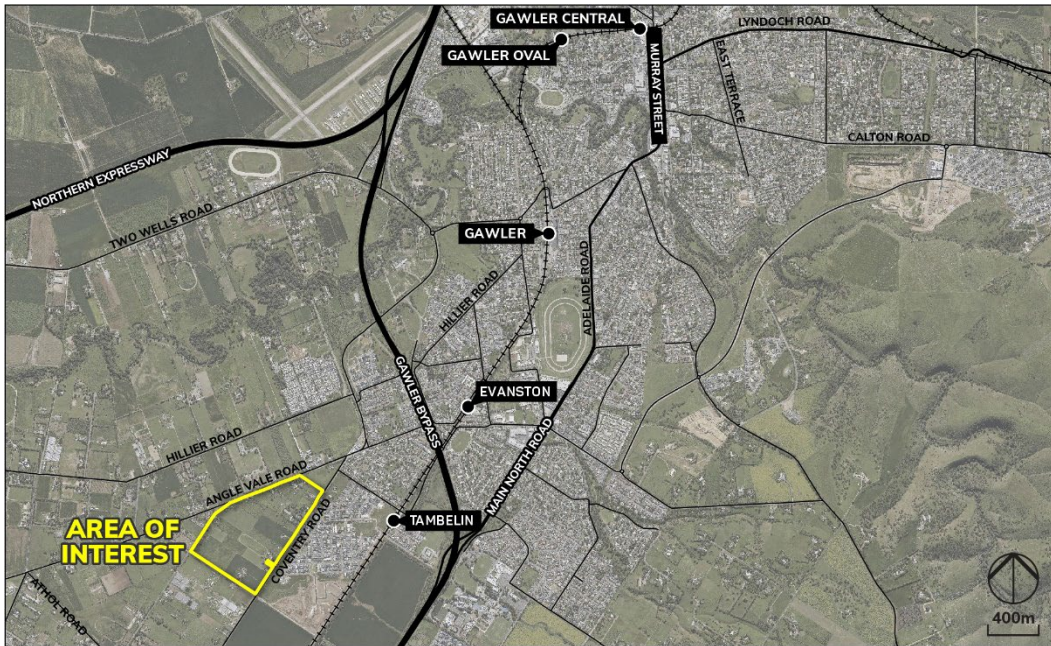


Figure 3: Area of Interest – Context within the Town of Gawler



Requested Action

Our client requests that Affected Area is recognised in the GARP as a future residential growth area. This request is justified below.

Justification

This is Consistent with the Intent of the Discussion Paper

The Paper identifies four areas outside, or on the fringe of, metropolitan Adelaide to be investigated for future housing and employment growth.

The 'north-eastern spine', which includes Evanston Gardens (Figure 4), is identified as one of these potential growth areas because:

It builds on the significant investment in road infrastructure and the electrification of the Gawler rail line.

Further development would build on the current development activity that is already happening for Roseworthy and Evanston and is anticipated to provide more than 5,000 additional dwellings.

Planned infrastructure investment in existing development fronts could be leveraged to support further development, including the additional 10,000 dwellings proposed for Concordia – which will in turn be a catalyst for additional regional infrastructure.

A future northern parkland and regional sporting hub could be located in the inter-urban break between the City of Playford and the Town of Gawler.

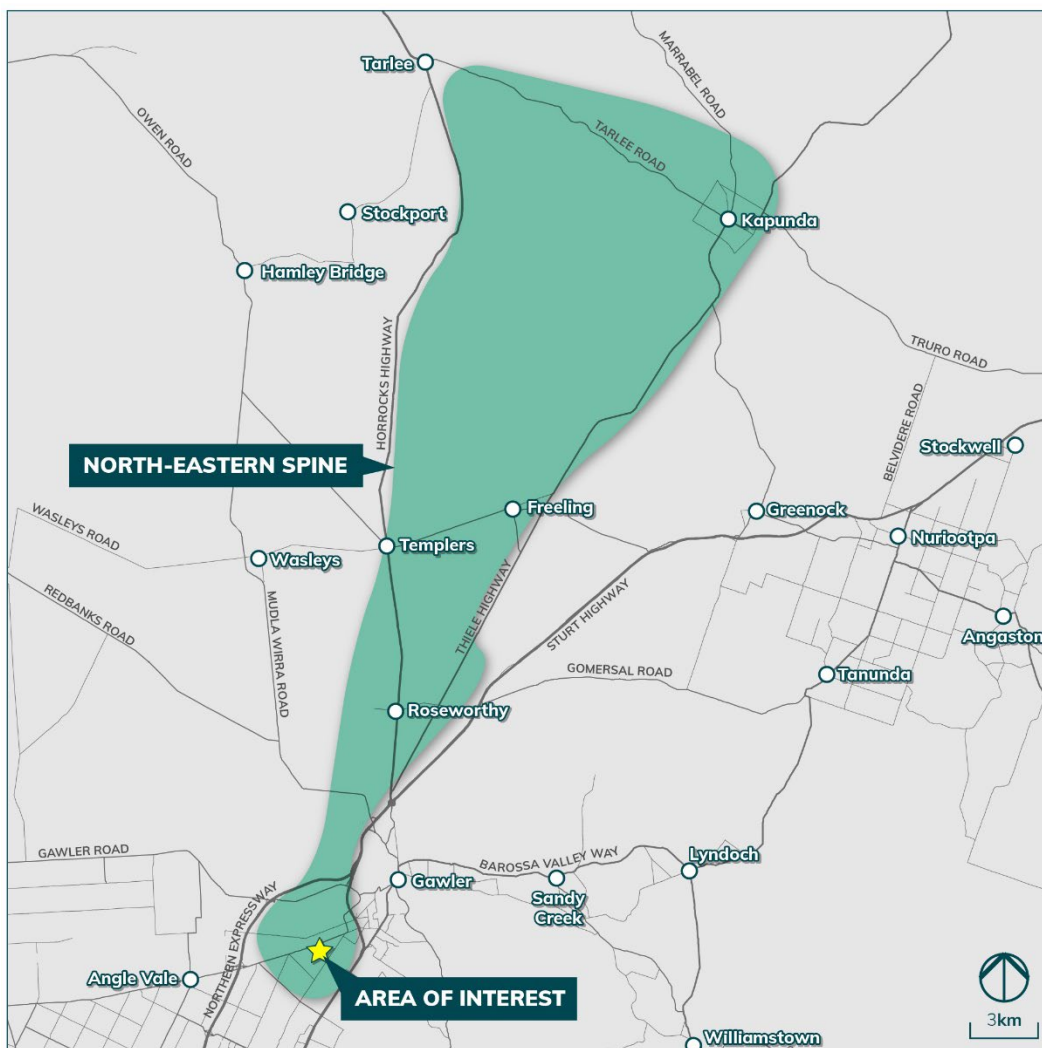
The topography of the land does not present significant challenges.

The land is well connected to employment activities in the Barossa Valley and northern Adelaide. And it provides an opportunity to provide additional industrial land connected to the Northern Expressway.¹

Our client supports residential growth occurring in Evanston Gardens and surrounding areas.

As highlighted in the extracts above, the north-eastern spine (and particularly the Affected Area) provides a logical extension to the existing urban footprint. It also benefits from significant investment in public infrastructure.

Figure 4: Discussion Paper area of investigation – north-eastern spine



We've prepared Figure 4 to provide greater clarity in respect to the north-eastern spine. URPS acknowledges that the Discussion Paper Mapping is conceptual and not intended to identify specific allotments at this stage.

¹ https://plan.sa.gov.au/_data/assets/pdf_file/0009/1259208/Greater-Adelaide-Regional-Plan-Discussion-Paper.pdf

Current Alignment of the Deferred Urban Zone is Flawed

The current alignment of the Deferred Urban Zone doesn't appropriately consider its surrounds. Rezoning from Deferred Urban to Master Planned Neighbourhood would result in residential land directly abutting with rural land under the current arrangement. This interface would be challenging to manage, as it would be difficult to ensure harmony between the differing land uses.

However, expanding the future residential growth area to capture all of the Affected Area identified in Figure 1 would enable a better town planning outcome as the residential growth area would

- Align with the Master Planned Neighbour Zone to the east.
- Be bound by roads, improving the separation buffer and minimising interface issues between the differing zones.

Complements the Expansion of Karbeethan Reserve

Gawler's Deferred Urban Zone is relatively small, of which the Karbeethan reserve makes up a considerable part. We understand there are plans to expand the reserve, which will further reduce the capacity of this zone to accommodate future growth.

Permitting residential development in the Affected Area will therefore offset the expansion of Karbeethan Reserve. This is particularly important given residential land in this area is highly sought after and is required to meet growth predictions.

Concern with Council's Southern Rural Areas Discussion Paper

The Town of Gawler has recently developed the 'Draft Southern Rural Areas Discussion Paper'. This strategic document will guide Council's Code Amendment agenda for the Rural Zone into the future.

This draft splits Council's Rural Zone into 5 precincts. The Affected Area is in Precinct 1 and is accompanied by the following vision:

Precinct 1 (Hillier and parts of Kudla) comprises the alluvial floodplain adjoining Gawler River and the bulk of existing local agricultural businesses. This land has a larger lot size than Kudla and holds the greatest capability for ongoing horticulture and value-added industry. The Rural Horticulture Zone is a logical zoning, consistent with the City of Playford zoning to the immediate south.²

This is a concerning outcome, particularly in light of the findings from Council's rural areas land capability assessment (discussed later) and the conclusions reached in the GARP discussion paper.

² https://www.gawler.sa.gov.au/_data/assets/pdf_file/0024/1480425/Attachments-Item-7.3-Opt.pdf

While Council's Draft Paper will be the subject of community engagement and refinement, it is critical that State planning policy clearly articulates that the Affected Area is appropriate to accommodate urban growth for the reasons presented in the GARP Discussion Paper.

More Clarity is Required on the Concept of a Rural Buffer / Greenbelt around Gawler

In the Playford / Dunstan Governments era, a plan was developed to provide a one-mile-wide buffer around numerous townships north of Adelaide. This concept was loosely incorporated into the Metropolitan Open Space System (MOSS)³.

The rezoning of land from Rural to MOSS was never undertaken within the Gawler Council Area however.

This has meant that some community members have viewed the Rural Zone around Gawler as a pseudo-greenbelt, which is far larger than originally anticipated as part of the Metropolitan Open Space System.

Gawler's Rural Zone is located outside of the Environment and Food Production Area (EFPA)⁴, which reinforces recent analysis and community sentiment that the area is not a state significant food production area.

The GARP should therefore:

- Clearly identify the rural buffer / greenbelt around Gawler
- Ensure the Affected Area is shown as a residential growth area, outside the greenbelt.

The Rural Areas Land Capability Assessment Indicates Farming is Not Viable

The Town of Gawler completed a 'Rural Areas Land Capability Assessment' in 2022. It found:

- Primary production in Council's Rural Zone is generally financially unviable due to a lack of affordable water and as the average allotment is too small for field cropping.
- Primary production could only become economically viable if an affordable supply of quality water becomes available and landowners desire to farm the land.
- Although the 'Barossa New Water' project has been identified as a potential source for recycled water, investigations remain in the conceptual phase and infrastructure constraints are not fully understood.

³ Gawler (CT) Development Plan consolidated on 18 July 2019, incorporates MOSS Map Ga/1 (Overlay 2) and the following note "This Map is indicative only. The State Government and Councils will undertake studies of each area resulting in detailed zoning maps to designate the boundary of MOSS and the policies relating to various areas. (The inclusion of private land in MOSS does not indicate an intention to purchase that land)". Reference to Development Plan Zone Map Ga/10 illustrates the Kudla area within a Rural Zone.

⁴ Under the Planning, Development and Infrastructure Act 2016 (SA), EFPAs have been introduced to: (i) protect food producing and rural areas, including conservation of natural landscapes and environmental resources, (ii) support sustainable growth of residential development in existing urban areas to maximise use of existing infrastructure and public spaces; and (iii) provide greater certainty for both food and wine producers and residential developers on the future of urban development in metropolitan Adelaide.

- Council has identified water proofing as a key action in their community plan. This includes seeking an extension of the 'Northern Adelaide Irrigation Scheme', which has largely focussed on securing and utilising recycled water to irrigate Council reserves. We understand there has been no financial commitment from Council to secure recycled water for third parties undertaking agriculture within the Rural Zone
- Even if recycled water was secured for agriculture purposes, salinity levels are likely to be high and require local customers to implement onsite desalination technologies. The potential costs associated with purchasing and powering this equipment requires further consideration and may be prohibitive.

Unfortunately, there was no discussion in the Council's Rural Areas Land Capability Assessment regarding the feasibility and interface pressures facing rural business ventures within existing rural living and residential localities.

Our client contends that farming the Affected Area is financially unviable. In the unlikely event it was financially viable, it would inevitably lead to interface issues and amenity impacts given the Affected Area is adjacent to a Master Plan Neighbourhood Zone, including medium-density greenfield housing. Concerns may include spray drift, noise and operating hours.

Few Alternative Land Use Options under the Current Situation

Figure 5 highlights the majority of land in the locality is utilised for well established Rural Living (Rural Residential) purposes, which detracts from the capacity of the area to effectively accommodate primary production because:

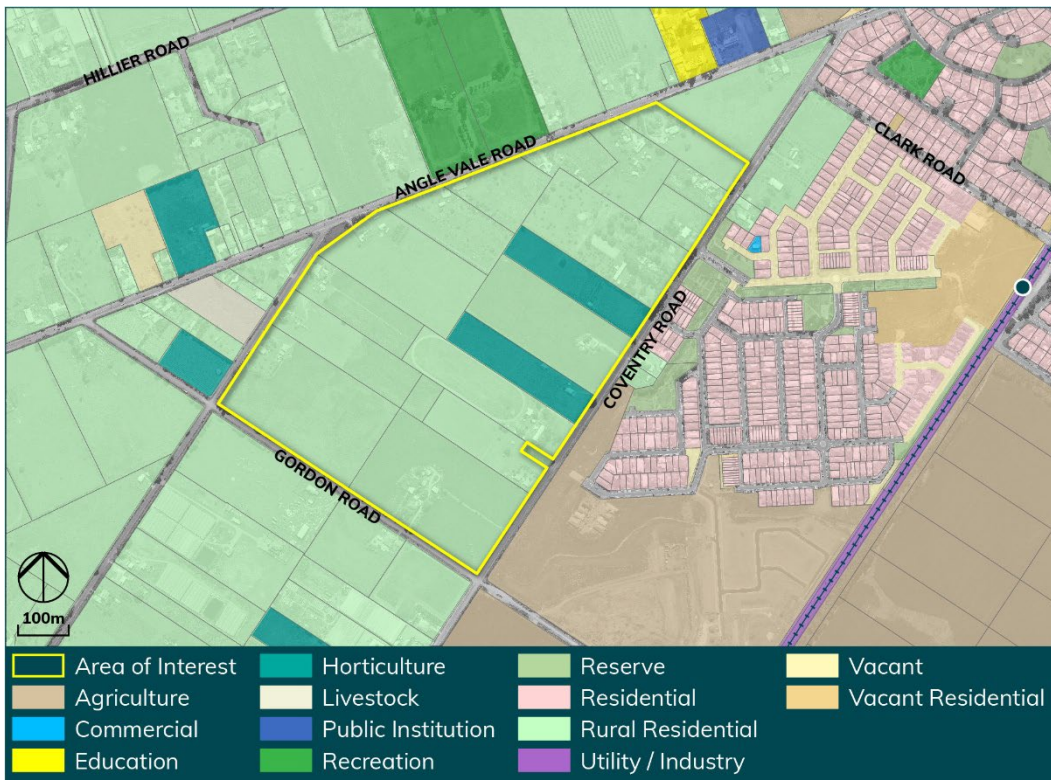
- Land has been fragmented into generally small lots, not viable for farming.
- Rural living land commands higher property value, making it less affordable for primary production ventures.
- The potential for interface conflict to arise (e.g. chemical spraying, early/late harvesting).
- Lack of access to a quality and affordable water supply (as acknowledged in the Council's land capability assessment).

These concerns have been previously raised by the local community and are impacting on the area's viability for primary production.

Under-investment, outdated planning policy and long-term uncertainty has had a detrimental impact on the development of this area.

The local community has previously advocated for a more practical approach that revises the zoning policies to facilitate residential development coupled with infrastructure upgrades and a greenbelt along Main North Road.

Figure 5: Generalised Land Use Map



The Requested Action is Aligned with State Planning Policies

The requested action provides a tangible response to the following “ideas for the GARP” identified by the Discussion Paper:

Prioritise and sequence the release of zoned land based on transparency of costs to the community of different forms of housing (including upfront development and ongoing living costs).

Prioritise strategic infill sites that are generally more economic to service than general infill.

Focus infill supply in locations where there is capacity in infrastructure networks.

Build on existing infrastructure capacity in townships where local councils identify growth opportunities.

Identify housing opportunities in areas well-connected to services, employment and infrastructure.

Identify strategic infill sites to provide more housing choices in areas near public transport, services and employment options.

Our client’s intent to develop the land is also aligned with several State Planning Policies (SPPs) relevant to the Discussion Paper. SPPs represent the highest level of policy in the planning system and address the economic, environmental and social planning priorities for South Australia.

In particular, the development of the Affected Area is consistent with SPPs 1 and 6 which seek 'Integrated Planning' and 'Housing Supply and Diversity' as:

- It forms a logical expansion of residential land within the existing urban area.
- It is connected to and integrated with existing transport infrastructure, services and other economic activities in the locality (e.g. the Adelaide to Gawler railway line).
- It would efficiently utilise land that is not suitable for farming, in turn protecting other primary production land that is more productive and viable.
- It is integrated with existing residential and commercial development.
- It would resolve, rather than create land use conflicts.
- It would support infrastructure investments (such as the expansion of the Karbeethan reserve) by increasing associated population catchments.
- It would provide increased housing choice, variety and affordability similar to the development to the east.

Conclusion

Our client supports the intent of the Discussion Paper and the identified growth opportunities along the north-eastern spine. Further, we contend that the Affected Area is suitable for residential development because of its:

- Proximity to the Adelaide to Gawler railway line.
- Proximity to existing social and community infrastructure.
- Integration and alignment with the newly developed urban areas directly east.
- Access to adjacent service infrastructure.
- Proximity to the district service centre of Gawler.
- Potential to achieve an integrated approach to development with infrastructure agreements to be secured over the area.
- Potential to support Council's investment in Karbeethan Reserve and the Evanston Gardens Community Centre via population growth.
- Inability to be developed for primary production due to economic and interface obstacles.

We are keen to work with the Commission, state agencies and Council to ensure the development of this land and the delivery of the identified housing objectives.

Yours sincerely



David Petruzzella

Senior Consultant

DTI:PlanSA Submissions

From: Catherine Orford [REDACTED]
Sent: Thursday, 26 October 2023 3:22 PM
To: DTI:PlanSA Submissions
Cc: Richard Dwyer; James Morris; Sam Morris
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper
Attachments: 01139_007_20231026_GARP Submission - King William Rd.pdf

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Please find attached a submission in response to the Greater Adelaide Regional Plan, in relation to land at King William Road, Wayville.

Kind regards,

Catherine Orford
Senior Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000



www.ekistics.com.au

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

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26 October 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

**RE: Submission on the Greater Adelaide Regional Plan Discussion Paper – Opportunity for Future Urban Growth –
32 King William Road and 8 Simpson Parade, Wayville**

1. EXECUTIVE SUMMARY

This submission supports the proposed inclusion of land at King William Road, Wayville, as a future Urban Corridor growth area in the 'Greater Adelaide Regional Plan (GARP) Discussion Paper' (the 'Discussion Paper').

The site provides an opportunity for immediate rezoning and redevelopment (within a 0-15 year timeframe) in order to unlock its development potential and further enhance King William Road as a vibrant mixed use precinct. King William Road is a key road corridor that is well serviced by public transport within close proximity of the Adelaide CBD, providing a logical opportunity to increase building height and housing density, combined with commercial development.

2. INTRODUCTION

We act for the Morris family, who own and control approximately 9,000m² of land on the western side of King William Road at Wayville (the 'subject land').

The site is located within the City of Unley, and is just over 1km from the southern edge of the Adelaide CBD.

King William Road has been identified as a 'Corridor Investigation Area' within the GARP Discussion Paper.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Regional Plan for Greater Adelaide and seeking wide input to inform the setting of the strategic direction on how and where Greater Adelaide should grow.

This submission, prepared on behalf of the Morris family, is provided to support identification of the subject land as part of an 'Urban Corridor' in the next Regional Plan for Greater Adelaide, facilitating future urban growth close to the Adelaide CBD.

As set out in the submission below, the subject land is highly suitable for urban expansion based on its unified (family) ownership and limited constraints, and as part of a broader growth corridor the land is well positioned to be redeveloped to assist in meeting the urban growth needs for Greater Adelaide.

3. THE SUBJECT LAND

3.1. Land Description / Identification

The subject land comprises the following Certificates of Title, as listed below and as illustrated in **Figure 3.1**:

1. 28-30 King William Road, Wayville (CT 5911/568);
2. 32 King William Road, Wayville (CT 5286/319); and
3. 8 Simpson Parade, Wayville (CT 5505/999).

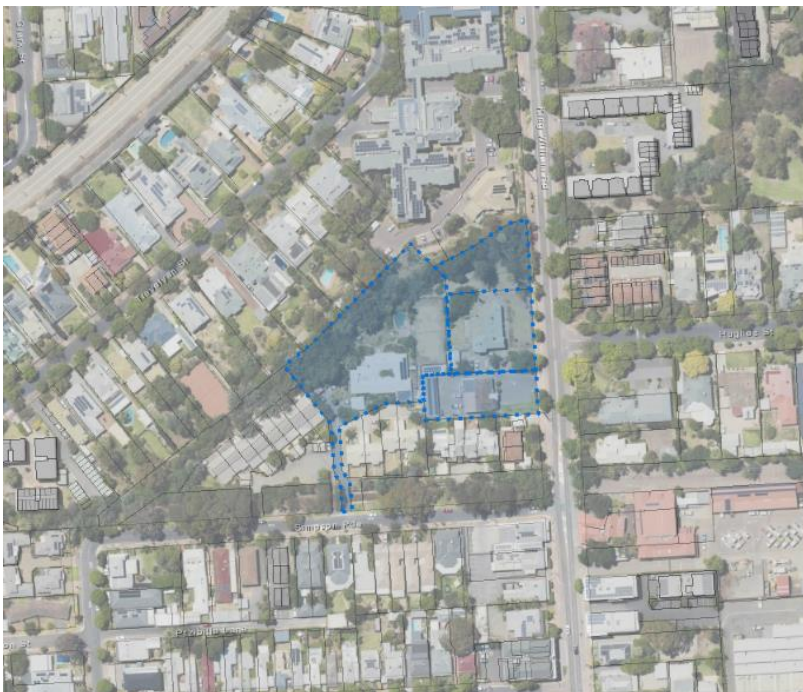


Figure 3-1: Aerial of Subject Site

The site has a combined area of just under 1 hectare, with approximate frontage of 100m to King William Road. The site therefore represents a large, consolidated land holding on a prominent urban corridor.

The subject land contains a number of existing (primarily single storey) buildings and various land uses, including:

- 28-30 King William Road – large detached dwelling (Figure 3.2);
- 32 King William Road – vacant office (formerly Felmeri Homes) (Figure 3.3);
- 8 Simpson Parade – large detached dwelling (Figure 3.4).

28-30 King William Road is listed as a Local Heritage Place, known as 'Brookside'. Notwithstanding, independent advice received from two heritage experts (Luciano Balsamo and Ron Danvers) indicates that Brookside may not meet the criteria for Local Heritage listing.

A portion of Glen Osmond Creek runs through the site, connecting to the South Parklands to the north, and the Adelaide Showgrounds to the west (part of the Patawalonga Catchment). The creek is in a relatively natural state and provides a landscaped buffer between the site and neighbouring dwellings to the west.



Figure 3-2 – 28-30 King William Road



Figure 3-3 – 28-30 King William Road



Figure 3-4 – 32 King William Road



Figure 3-5 – 8 Simpson Parade

3.2. The Locality

The subject land is located towards the northern end of King William Road, just south of the City to Glenelg tramline (Approx. 480m to tram stop 1 King William Road) and the main intersection of King William Road with Peacock Road and Greenhill Road.

King William Road is a well-known and popular destination for both the Unley and wider communities, providing a vibrant and cosmopolitan mix of cafes, restaurants, fashion boutiques, galleries, consulting rooms and other commercial businesses. It successfully combines a unique streetscape design, with its paved road surface and high quality landscaping and street furniture, with historic character buildings interspersed with more recent, contemporary buildings. The subject land is located within a section of King William Road that contains a mix of residential development, aged care, offices and consulting rooms, including:

- Eldercare 'The Lodge' aged care facility – located to the north of the site on the corner of Young Street and King William Road, comprising a Local Heritage Place ('Wekewauban') and predominantly two storey buildings accommodating various aged care services and accommodation. Development further north, between Young Street and Greenhill Road, comprises predominantly offices within adaptively reused heritage buildings interspersed with modern commercial buildings;
- One and two storey dwellings and townhouses located on the corner of King William Road and Simpson Parade, noting that the dwellings fronting Simpson Parade are set back behind a stormwater drain and established trees, with bridged vehicle access from Simpson Parade;

- One and two storey detached dwellings adjoining the site to the west, fronting Trevelyan Street;
- Consulting rooms within character buildings further south on King William Road;
- Three storey residential flat building and two storey townhouses to the east, on the opposite side of King William Road; and
- Commercial offices within character buildings and the City of Unley works depot to the south-east, on the opposite side of King William Road.

The various surrounding land uses are illustrated in **Figure 3.6** below, with residential activities in pink, commercial offices in bright blue, public institution in darker blue and utilities/industry in purple.



Figure 3.6 – Land uses surrounding the site (SPPA)

The subject site presents an opportunity to capitalise on its strategic location on a north-south transit corridor, within close proximity to the Adelaide-Glenelg tram line, Adelaide Parklands and approximately 1.0 kilometre from the Adelaide CBD.

3.3. Existing Zone & Policy Framework

The subject land is currently located within the **Established Neighbourhood Zone** and covered by the **Historic Area (Un22) Overlay** (Planning and Design Code - Version 2023.14 dated 12 October 2023).

Land on the opposite side of King William Road (to the east) is zoned **General Neighbourhood**, and the site adjoins land zoned **Business Neighbourhood** to the north and south (on the opposite side of Simpson Parade).

The existing 'General Neighbourhood Zone' and TNV's that apply to the site seek predominantly low scale, low density residential development, with a minimum site area of 600m² for detached dwellings and maximum building height of 1 level (6 metres).

Figure 3.7 identifies the current zoning that applies to the subject site and surrounding locality, illustrating that the portion of King William Road between Young Street and Simpson Parade/Hughes Street forms a clear 'gap' in the 'Business Neighbourhood Zone' that extends for the majority of this portion of King William Road.

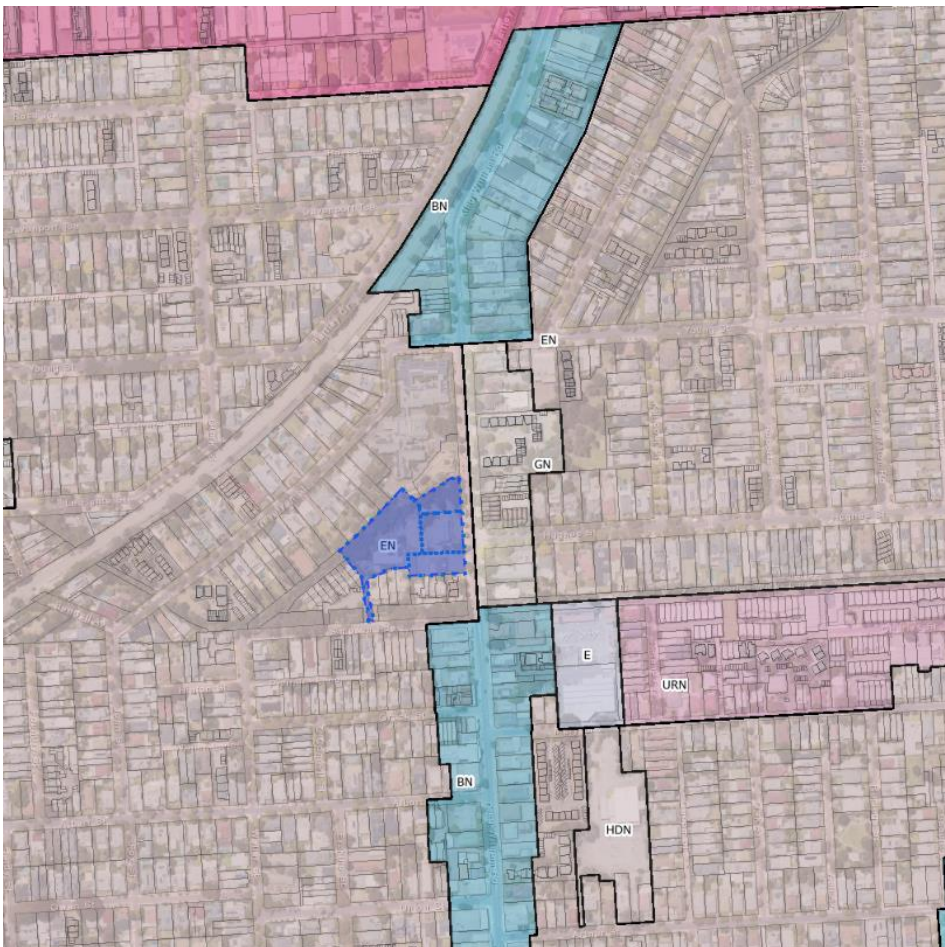


Figure 3-7 – Site and Locality Zoning Plan

3.4. 30 Year Plan for Greater Adelaide

The strategic direction contained within the ‘30 Year Plan for Greater Adelaide’ and in particular the ‘Inner Metro Rim Structure Plan’ seeks ‘Corridor (mixed infill)’ along King William Road. In particular, it seeks to ‘Encourage mixed-use infill development along the high street with retail, commercial and home office shopfronts and residential accommodation above (3 storeys)’ – refer **Figure 3.8** below. A subsequent version of this plan endorsed by the Unley Council (dated 2018) also supports rezoning of the King William Road corridor, with buildings heights of up to 4 levels contemplated (**Figure 3.5**).

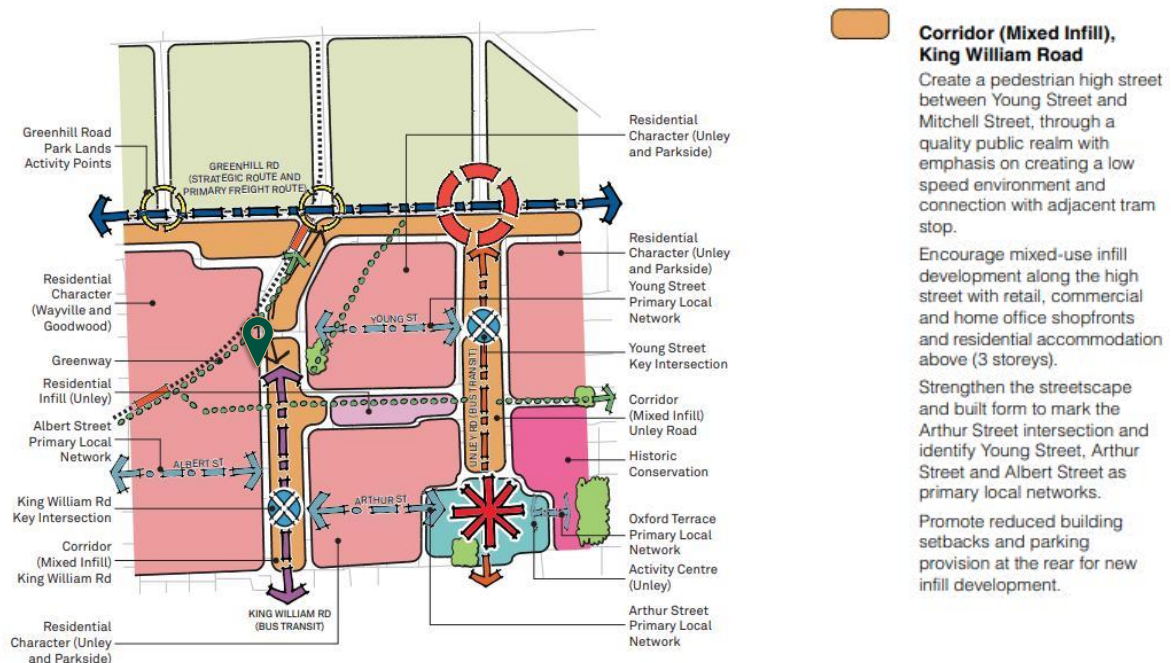


Figure 3.8: Inner Metro Rim Structure Plan (Extract)

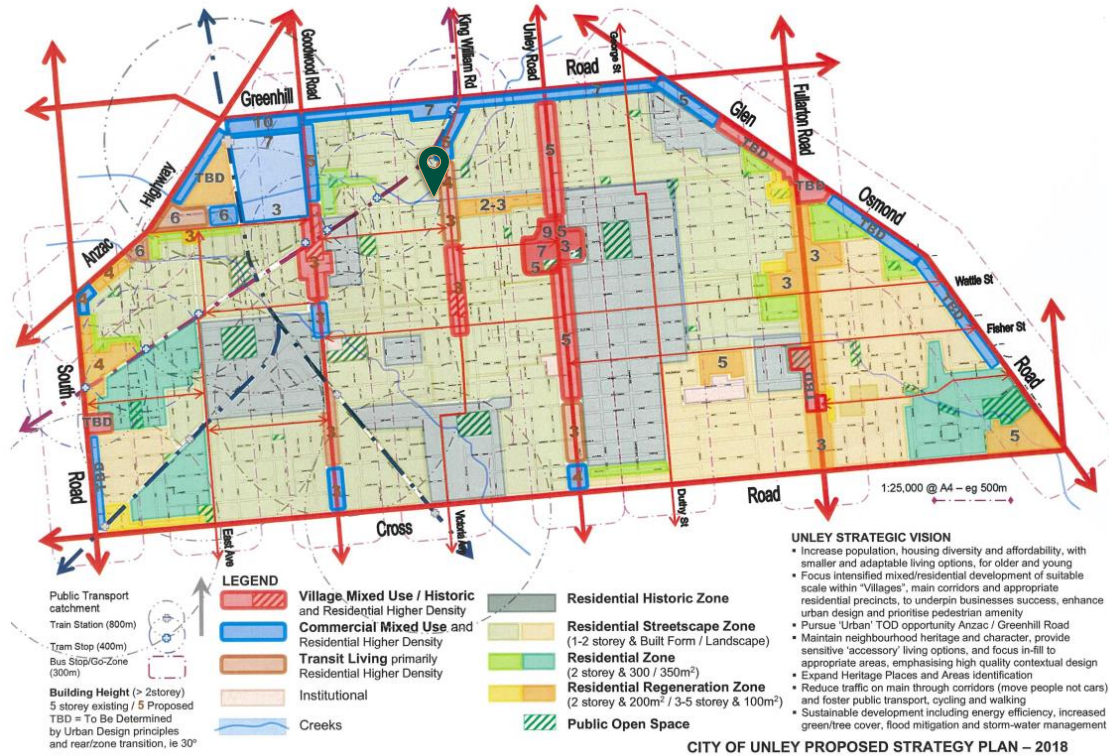


Figure 3.5: City of Unley proposed Strategic Plan 2018 (Extract)

4. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

According to the Greater Adelaide Regional Plan (GARP) Discussion Paper, current population projections demonstrate that by 2051 we need to plan for an additional 670,000 people in Greater Adelaide, with required housing supply of 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes. This is in addition to the existing 200,000 new homes already planned for in land already zoned for residential development (164,000 homes) and on land already identified for future residential rezoning (47,000 homes). The Discussion Paper identifies the need to therefore supply an additional 100,000 homes by 2051 or based on current estimates under a high growth scenario - we will run out of land for future residential development within 30 years unless an ongoing rezoning program is established.

The Discussion Paper has identified that future growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision.

As identified in the Discussion Paper, urban infill can deliver significant public benefits when appropriately located and designed. Urban infill refers to "new housing constructed on vacant and underutilised allotments, interspersed amongst older, existing houses in established neighbourhoods". It has recognised economic and productivity benefits as it increases

population close to higher concentrations of jobs and services, near amenities and public transport options, as well as providing a diversity of housing types, affordability and housing for different life stages near existing support networks.

Strategic infill opportunities in the form of urban corridor development are recognised in the Discussion Paper as continuing to play an important role in providing additional growth options. The 'Urban Corridor Zone' was introduced to the planning system in 2013 as a key outcome of 30-Year Plan for Greater Adelaide investigations, initially along transit corridors close to the CBD, but later (in 2017) expanding to other major corridors. Urban corridor infill development typically occurs in a 'strip' formation, predominantly between main arterial roads and established low density areas, in inner and middle ring suburbs. Examples of Urban Corridor zones within the inner southern region of Adelaide include Greenhill Road (enabling development of approximately 7 levels or more) and Unley Road (5 levels).

Urban corridor development presents significant opportunities for mixed use development, offering a diversity of housing options in highly sought after established areas. Focussing high density development along transit corridors eases the pressure on established suburban streets, preserving their distinctive residential and often historical character.

The Discussion Paper anticipates two types of corridor development, depending on the sensitivity of adjacent land uses:

1. Corridor development next to established residential land uses, particularly heritage and character areas will be of a lower scale and intensity to manage the interface with these neighbourhoods.
2. Corridor development with fewer sensitive interface issues to manage will seek to maximise the scale and intensity of buildings and uses.

Discussion Paper Figure 10 – Proposed areas of investigation: Strategic infill and corridor growth identifies the main roads within Adelaide Metropolitan Area that the Commission proposes to review, with a view to establishing the next iteration of urban corridor rezoning.

Figure 10 in the Discussion Paper (extract in **Figure 4.1** below) identifies King William Road as one of the urban corridors highlighted for investigation.

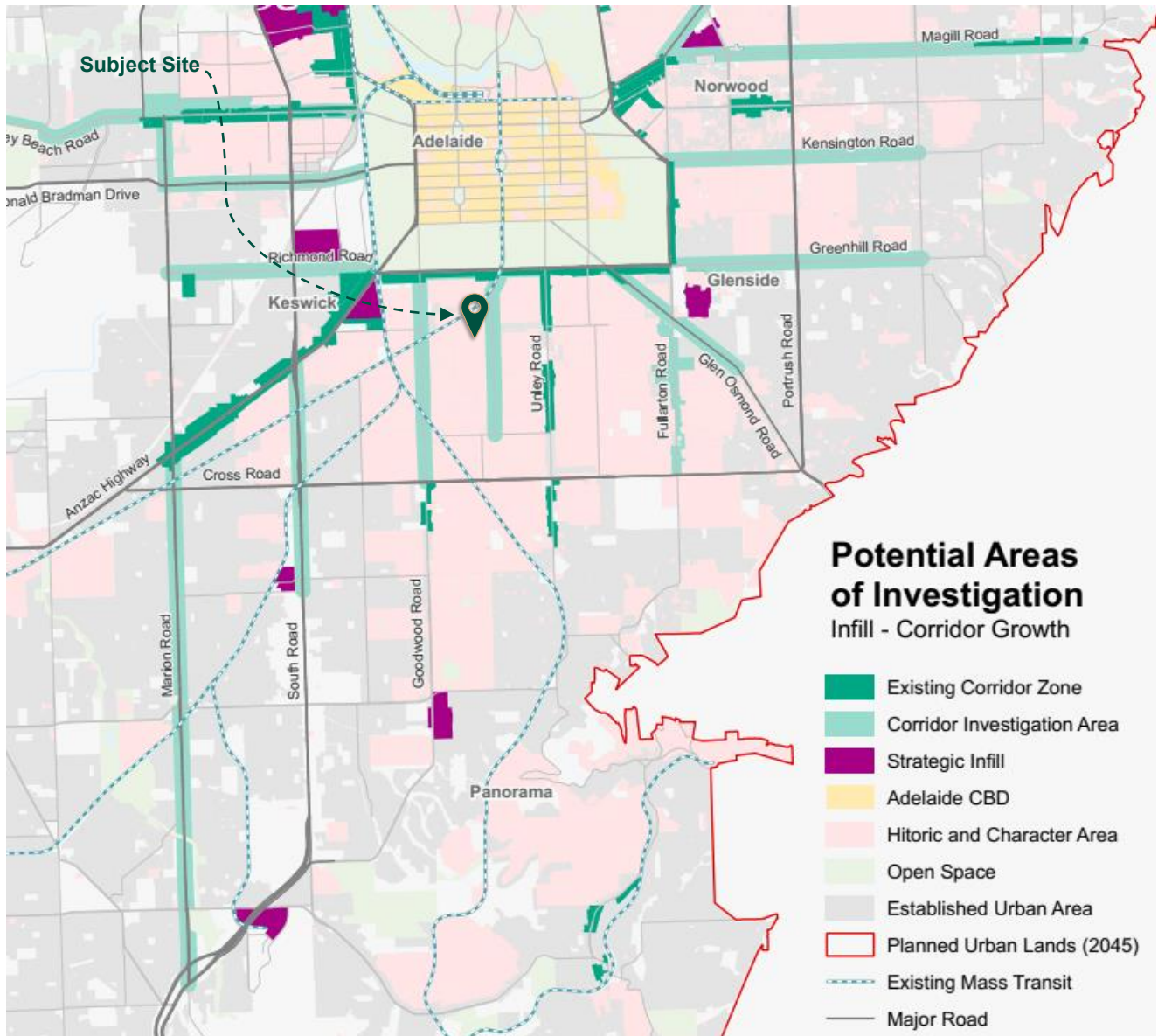


Figure 4.1: Corridor Growth Investigation Areas - Greater Adelaide Regional Plan Discussion Paper page 136)

The Discussion Paper similarly identifies Goodwood Road, Glen Osmond and Fullarton Roads as potential urban corridors south of the Adelaide CBD that could accommodate higher density mixed use development.

We note the following challenges identified in the Discussion Paper for 'urban corridor development' and the suitability of the subject land to address each of the challenges identified:

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
<p>Integration of higher density corridor developments with adjacent established housing, land division patterns and allotment depths.</p>	<p>The land division pattern along main roads within existing Urban Corridor Zones is a consistent challenge for development, as the predominantly single allotment depth creates difficulties with commercial viability, and interface management with lower scale established development.</p> <p>The subject land is significantly deeper than a typical single allotment and is therefore ideal for redevelopment with a greater height and density, enabling sensitive interfaces to be appropriately managed.</p> <p>Investigations into widening existing Urban Corridors, or creating new Urban Corridor zones of sufficient depth to accommodate viable mixed use development, should be investigated to improve the development potential of road corridors.</p>
<p>Larger sites improve design outcomes, but fragmented ownership can impede site assembly.</p>	<p>The subject land is under the same unified (family) ownership. Future negotiations with adjoining owners could further increase the size of the land holding. Early discussions with Eldercare (Adam Yoemans – General Manager Property) have indicated they are generally supportive of the redevelopment (and rezoning) of the site.</p>
<p>Some corridors are impacted by heritage and character overlays or are adjacent heritage and character suburbs. Any development of these corridors needs to be sensitively integrated into the surrounding urban form, and the design and interface carefully managed.</p>	<p>The subject land and adjoining land in the 'Established Neighbourhood Zone' is affected by an 'Historic Area Overlay (Un/22)', noting this does not apply to the corridors of land to the north and south of the site within the 'Business Neighbourhood Zone'.</p> <p>Any future rezoning of the site and King William Road corridor will need to consider the historic significance of existing buildings, as well as sensitive interfaces with adjoining character areas, although other than 28-30 King William Road ('Brookside'), the existing buildings on the site do not have any heritage significance, and as mentioned, the Local Heritage listing of 28-30 King William Road should be reviewed based on expert advice.</p> <p>The interfaces can be successfully managed by appropriate design and built form, as evidenced in other urban corridor examples such as Prospect Road. The subject land is particularly well placed in this regard, being wider than a typical single</p>

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
	<p>allotment corridor, and including the Glen Osmond Creek along the western boundary forming a natural buffer to adjoining development.</p> <p>The north-south orientation of King William Road will also assist in alleviating potential amenity impacts on adjoining low-rise development such as overshadowing.</p>
Ensuring enough local employment land to service residents	<p>The site does not currently contain significant employment generating activities that would be displaced by redevelopment, with existing uses comprising dwellings and a vacant office.</p> <p>The site, and entire length of King William Road identified in Figure 10 of the Discussion Paper, is within approximately 1km of the Adelaide CBD, providing easy access for future residents to significant employment opportunities. High frequency bus services operate along King William Road, and on-road bicycle lanes provide easy access to the City. The Wayville and Greenhill Road tram stops are both within a 10 minute walk of the site.</p>
Some former industrial sites pose the risk of environmental contamination	<p>The subject site is not a former industrial site. Contamination investigations will be undertaken, should the land be proposed to be rezoned for a more sensitive land use than currently exist to ensure the site is suitable.</p>

5. REDEVELOPMENT SUITABILITY

Based on initial investigations (and subject to further future detailed analysis), we anticipate the site can accommodate medium rise (3 to 6 building levels), medium net residential density (35 – 70 dw/ha) with potential ground level retail / commercial uses where appropriate to facilitate mixed use infill development, particularly along the King William Road frontage of the site, with appropriate transitions to residential development to the west and south.

Consideration of the interface with the adjoining residential development (likely to remain in the 'Established Neighbourhood Zone') will be an important part of the future rezoning process. We would anticipate a lower building height at the interface of the site, assisted by the retention of the existing Glen Osmond Creek and associated vegetation that forms a natural separation and screening, particularly to the west.

Redevelopment of the site will need to carefully consider factors such as the current land use configuration, location and setting of Local Heritage Places, suitability of the 'Historic Area Overlay', existing site constraints (such as the creek and topography), future aspirations for the King William Road corridor and the contextual location of the site as well as adjoining land uses and zoning.

Based on a limited 'desktop' assessment of the site, we are of the opinion that the site, and the King William Road corridor identified in the Discussion Paper, is well placed to accommodate future urban corridor infill development given:

- Transport – As mentioned, the King William Road corridor and subject site is extremely well located to accommodate urban infill, being located close to the Adelaide CBD, tram stops and on a high frequency "Go Zone" public bus route on King William Road (bus services every 15 minutes between 7.30am to 6.30pm Monday to Friday);
- Topography – The land is relatively flat (with the exception of Glen Osmond Creek) and should not topographically constrain future development options;
- Flooding – Only limited portions of the King William Road corridor are affected by the current 'Hazards (Flooding) Overlays', primarily in the vicinity of existing creek crossings and open channel stormwater drains. Any areas of potential flooding or overland flow could be suitably mitigated through an engineered response in a future development of the site including possible detention in open space areas; and
- Heritage – Heritage Places and historic character is an integral and distinctive element of the King William Road corridor, a distinctive feature that could be capitalised on further through innovative design and adaptive reuse of heritage buildings. A review of heritage listings could also be undertaken either on a site specific basis or as part of a broader exercise.

The majority of the subject land is under the control of the Morris family, who strongly support:

- The identification of the subject land as a future urban growth area in the form of an urban corridor supporting strategic infill development; and
- The initiation of a Code Amendment to rezone the land to facilitate mixed use development and an uplift in building height and density.

The land owners have commenced early investigations into the potential to rezone the subject site, and have initiated discussions with senior administration of the City of Unley in relation to a proponent initiated Code Amendment.

The subject site therefore has a strong propensity for future development and delivery to market should King William Road be identified as a future urban infill area to contribute to the supply of housing across Greater Adelaide.

6. CONCLUSION

This submission is provided to assist the State Planning Commission's upcoming review of the Greater Adelaide Regional Plan, in response to the Discussion Paper issued by the State Planning Commission.

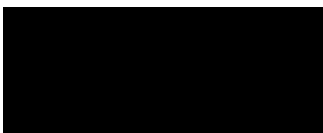
We are of the opinion that the King William Road corridor, incorporating the subject land, provides a logical opportunity for urban infill growth along a strategic transport corridor as identified in the 'Greater Adelaide Regional Plan Discussion Paper'.

Based on preliminary 'desktop' analysis the subject site does not present significant constraints that would prevent future urban development and the land is not fragmented and is under unified family ownership and control which will enable a coordinated approach and delivery of a future mixed use development outcome.

The Morris family therefore requests that the subject site is identified as a 'future urban growth' area as part of the King William Road Urban Growth Corridor in the next iteration of the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years).

Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

Yours sincerely,

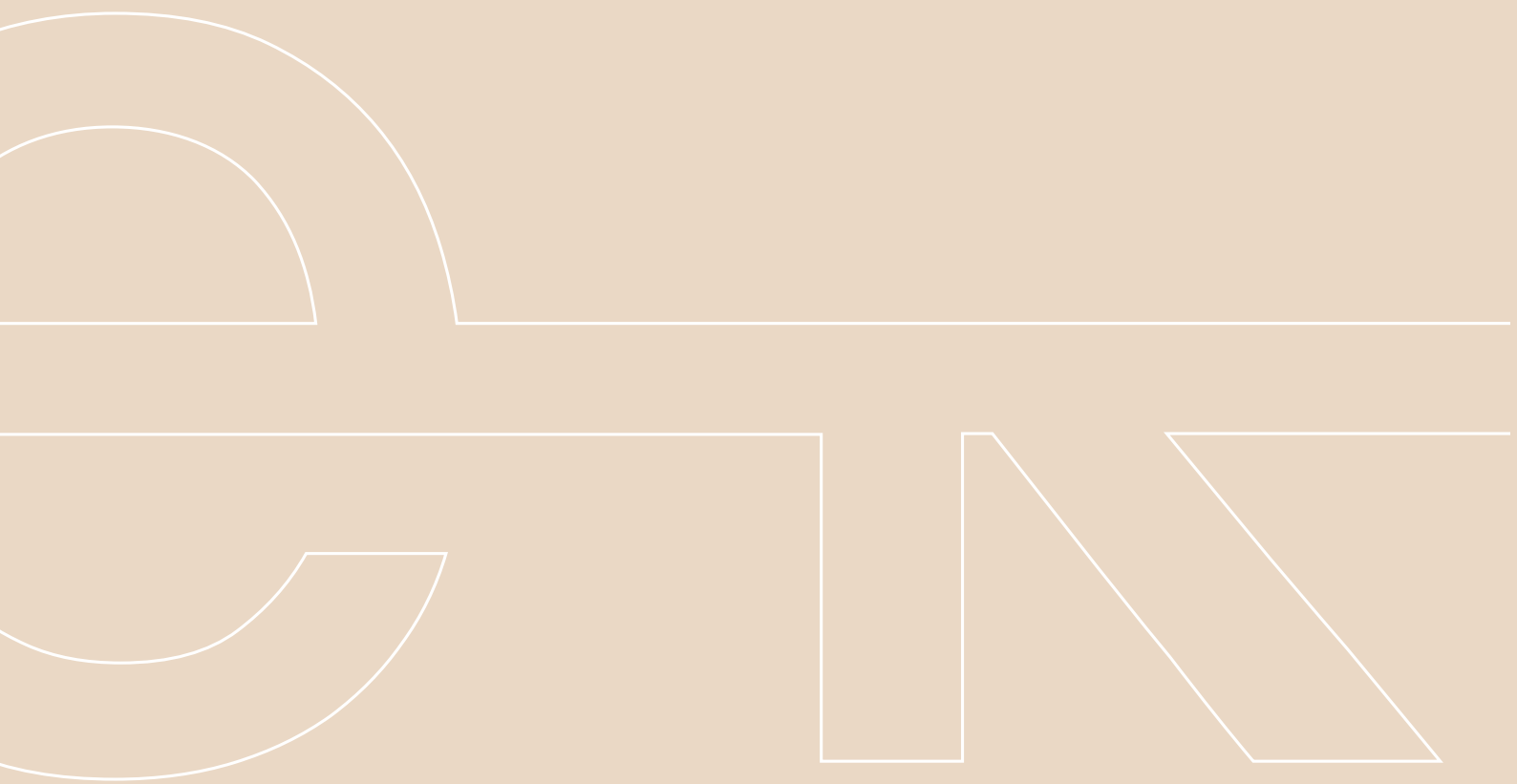


Richard Dwyer
Managing Director

CC: The Morris Family







DTI:PlanSA Submissions

From: Sarah Lowe [REDACTED]
Sent: Monday, 6 November 2023 12:38 PM
To: DTI:PlanSA Submissions
Cc: [REDACTED] Grazio Maiorano
Subject: GARP Discussion Paper Submission - Hillier
Attachments: 231101 V1 Hillier GARP Submission.pdf

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Good afternoon,

Please find attached a submission prepared on behalf of Mr Michael Virgara and Mr Angelo Librandi.

Kind regards,

Sarah



Sarah Lowe
Consultant
[REDACTED]

27 Halifax Street
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Adelaide SA 5000
08 8333 7999

Kaurna Country

My working hours are:
Monday to Friday 8.30am-5.00pm

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6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Hillier

We act for Mr Michael Virgara and Mr Angelo Librandi (Proponents), the owners of several parcels of land in Hillier which present strategic advantages for future urban development.

Thank you for the opportunity to comment on this Discussion Paper (Paper) which seeks to stimulate debate on how the GARP will help deliver the 300,000 additional homes and associated employment land possibly needed over the next 30 years.

Affected Area

The Proponents own the following 5 allotments (Affected Area):

- 49 Wingate Road, Hillier (CT5447/439).
- 63 Wingate Road, Hillier (CT5206/748).
- 83 Wingate Road, Hillier (CT5206/749).
- 512 Angle Vale Road, Hillier (CT6220/44).
- Lot 329 Angle Vale Road, Hillier (CT6220/42).

The allotments are distributed across 2 clusters forming a total area of 36ha – the Wingate Road properties are owned by Mr Virgara and Angle Vale Road properties are owned by Mr Librandi. The Proponents are open to working with the landowner of the separating land parcel.

The Affected Area is within the Rural Horticulture Zone, located close to the Northern Expressway and expanding development fronts (see Figure 1 below).

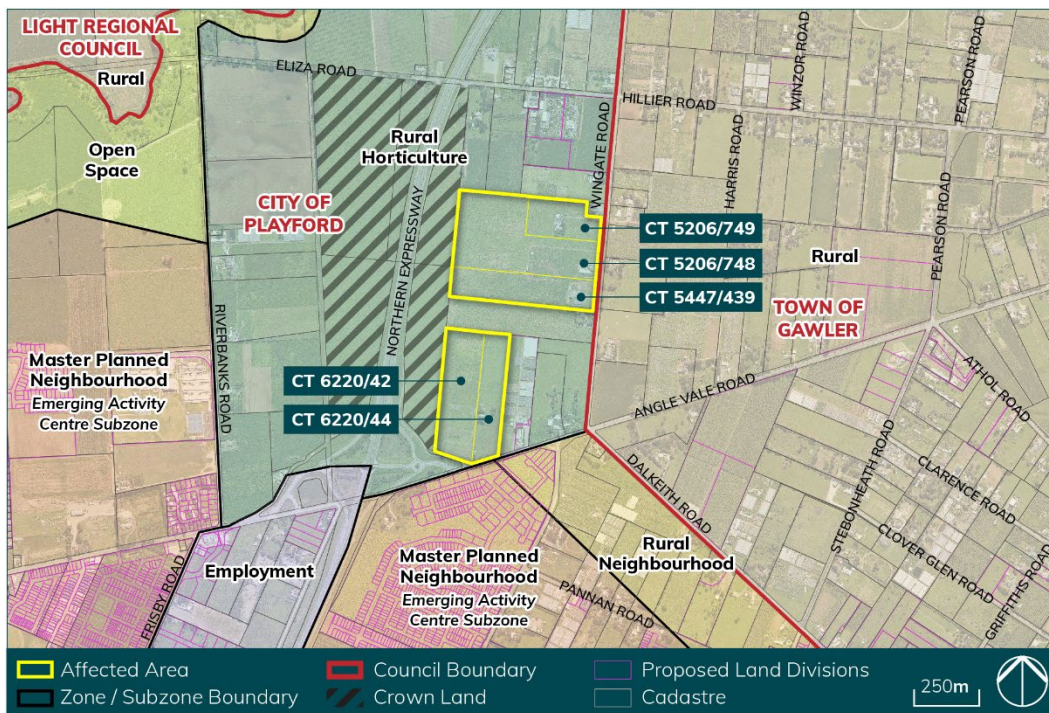


Figure 1 - Affected Area

Requested Outcome

We request that the Commission identifies the Affected Area as being suitable for future urban development with the GARP.

Further, we are eager for the redevelopment of this land to be prioritised within the GARP. This outcome is strongly aligned with the Paper and broader strategic planning policy. Developing this land is also a priority for the Proponents.

Justification

Consistency with Discussion Paper

The Paper indicates Greater Adelaide's population could grow by 670,000 people in the next 30 years, requiring targeted greenfield and infill development to provide appropriate housing and employment for these people. Easily accessible employment land is therefore crucial to support population and business growth.

The Paper also notes that employment land needs to be distributed to meet local demand, reduce travel times and ensure that there is a mix of land uses considered in future development. Employment land that is supported by strategic infrastructure such as major roadways should be leveraged by the planning system.

The Affected Area is within the 'north-eastern spine' and is very close to the 'Employment Growth Investigation Area' identified by Figure 15 of the Paper (p 158).

This location was considered to be suitable for urban growth according to the Paper because (among other things):

- It supports significant population growth nearby (eg Gawler and Angle Vale).
- It capitalises on significant infrastructure investments nearby, completed and planned (eg the Northern Expressway and electrification of Gawler railway line).
- It is well connected to employment activities in the Barossa Valley and northern Adelaide.
- It provides an opportunity to provide additional industrial land connected to the Northern Expressway.

The Affected Area enjoys all of the characteristics above which make it suitable for employment purposes.

Further, the Affected Area provides an excellent opportunity to provide employment close to expanding greenfield developments, supporting the principles of "living locally" and therefore delivering on the objectives of the GARP.

General Suitability of the Affected Area

The Proponents support the Affected Area being identified and used for employment purposes.

A land use map of the Affected Area and locality is shown in Figure 2. From this, it is clear that most allotments within locality are used for rural living purposes, despite the Rural Horticulture and Rural Zones covering most of the locality. The locality is of little value/productivity in terms of horticulture and agriculture. Indeed, the Proponents are in the process of winding-up almond and rose growing activities within the Affected Area.

Further, interface issues are likely to arise, as the existing Master Planned Township Zone is developed more fully. Any productive rural land uses will be faced with spray drift and noise complaints by the increased number of residential neighbours.

An alternative zoning scheme is warranted. In particular, the Affected Area can accommodate a mix of dwellings or employment land uses as it forms a logical extension of the expanding development fronts to the south and west.

The Affected Area is well serviced by transport and community infrastructure, presenting an opportunity for urban growth well-connected to the region (Fig 3).



Figure 2 – Land Uses

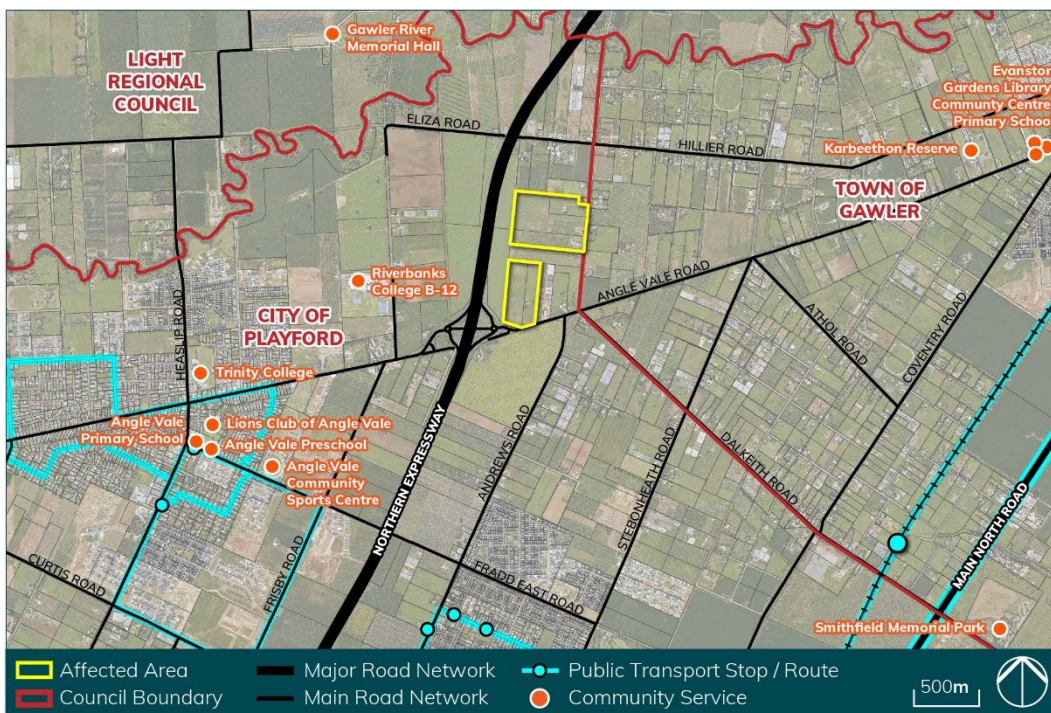


Figure 3 - Connectivity

Figure 1 previously indicated that the land between the Affected Area and the Northern Expressway is owned by the State Government with short term leases over it for cropping. The land on the western side of the Northern Expressway is also Crown Land. Our view is that this Crown Land should also be considered strategically for urban development as it is contiguous with the Affected Area.

Conclusion

We support the intent of the Discussion Paper and the identified growth areas.

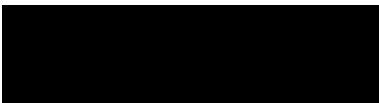
In particular, the Affected Area is located within the north-eastern spine and very close to the (indicatively mapped) Employment Growth Investigation Area identified by the Paper.

Further, we request that the GARP:

- Identifies the Affected Area as being suitable for future urban development.
- Also considers the possibility of residential development being delivered within the Affected Area (as well as employment land uses).
- Prioritises the future development of the Affected Area given the strategic advantages it holds, combined with the eagerness and capacity of the Proponents to redevelop the land.

Not only is the Affected Area suitable for urban development that achieves the strategic objectives of the Paper, the Proponents are eager to work with Council, the Commission and state agencies to deliver upon the potential of the land.

Yours sincerely



Sarah Lowe
Consultant

DTI:PlanSA Submissions

From: Tarnia Heinze [REDACTED]
Sent: Wednesday, 1 November 2023 11:17 AM
To: DTI:PlanSA Submissions
Cc: Craig Doyle; Ashton Hurn; Nev Linke; Damion
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: submission.pdf; Light Coucil reveiw.pdf; Barossa council minutes of meeting July 2021.pdf

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Submission To The Character Preservation Committee,

Neville Linke has asked me to send the attached submission to you, he also asked me to add the following:

In preparation for this submission the Major of The Barossa Council has visited this area with Craig Holden Chair of the State Planning Commission and suggested that a joint submission from The Light Council and The Barossa Council could correct this anomaly where the vineyard is locked in between two residential areas within the Nuriootpa town zone.

I will also send you two other attachments one from The Light Council and one from The Barossa Council that highlight the reviews in relation to this property.

We will await your reply,

Kind regards,

Tarnia Heinze – LVS Group SA Pty Ltd
Office Manager.



5 December 2017

Planning Engagement
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Dear Sir/Madam

Re: Review of the Character Preservation (Barossa Valley) Act 2012

We act for LVS Admin Pty Ltd. Our client is the registered proprietor of Allotment 12 Moppa Road South, Nuriootpa, on the western outskirts of Nuriootpa township.

Our client has asked us to make this submission in response to the notice which was published in *The Advertiser* 1 November 2017 inviting feedback on the *Character Preservation (Barossa Valley) Act 2012* and the *Character Preservation (McLaren Vale) Act 2012*. Our client's interest concerns the *Character Preservation (Barossa Valley) Act* only.

The Land

Our client's land is described as 130-138 Moppa Road South, Nuriootpa ("the land"). A copy of the relevant Certificate of Title is **enclosed**.

The land has an area of 10.3 hectares. It also has a 260 metres frontage to Moppa Road South and a 352 metre frontage to Sir Condor Laucke Way.

The land is situated in the Primary Production Zone as indicated on Zone Map Lig16/ of the Light Regional Council Development Plan. As a consequence of its location in the Primary Production Zone, the land is also in the Character Preservation District as detailed on Overlay Map Lig/16 and on GRO Plan GP 4 of 2012.

The land is disposed as a vineyard, with a house and workshop buildings located towards and with access to Moppa Road South. The land's features are shown on the Site Plan **enclosed**. It will be noted from the Site Plan that the land is surrounded by urban-type development namely:

- to the west: a mainly residential enclave of 25 detached dwellings all with frontage to Neil Avenue and also in the Primary Production Zone;



- to the north: industrial sheds now used for workshop and storage purposes in the Industry (Barossa Valley Region) Zone;
- to the east: Barossa Village Inc Retirement Homes and conventional housing in the Residential Zone of the Development Plan for the adjacent Barossa Council; and
- to the south: a mix of commercial development with frontage to the southern side of Sir Condor Laucke Way, including a petrol filling station, irrigation supplies showroom and workshop, and other commercial workshop buildings. These commercial uses are also in the Primary Production Zone, and are identified on Concept Plan Map Lig/6 for commercial or light industrial purposes with linked retail uses (see PDC 9 Barossa Valley Region, Policy Area 2).

Moppa Road South forms the local government boundary between Light Regional Council and The Barossa Council.

Moppa Road South has also been identified for upgrading involving new intersections to facilitate the Samuel Road B-Double freight route. A roundabout at the Sir Condor Laucke Way/Moppa Road South intersection was planned as part of this project, and would involve acquisition of portion of our client's land. Our client has previously advised it was not in principle opposed to this upgrade, subject to Council supporting the rezoning of the land for residential purposes.

Light Regional Council

We have made numerous submissions to Light Regional Council since 2008, highlighting the anomaly which exists with respect to our client's land.

At the General Council meeting held on Tuesday 28 November 2017, we note that Light Regional Council has resolved to make a submission on the *Character Preservation (Barossa Valley) Act 2012* (Agenda Item 13.3.3). The Agenda Item identified the boundary anomaly which exists with respect to our client's land. The Agenda Item discussion under 'District Boundary Review and Anomalies' had this to say about our client's land:

".... given the time that has passed and the opportunity presented via this review to consider the state of the district, Council officers nominate a revisit of the district boundaries in respect of this location [Nuriootpa West] with a view to making an amendment to include the property at 130-138 Moppa Road South, Nuriootpa (CT 5350/638) within the township as originally intended.



The property in question is under the ownership of LVS Admin and comprises a small vineyard, dwelling and business operation. The land immediately adjoins the township of Nuriootpa and is bound by commercial development to the south, a residential development to the west (Neil Avenue) and industry/residential to the north [and east]. The current arrangements do not facilitate effective use of the property for primary industry purposes with day-to-day activities (such as spraying and harvesting) largely constrained by both the residential and commercial uses each sharing a boundary with the property."

The photographic image below was included with the Council Agenda.



The Council Agenda also identified two allotments to the immediate north of our client's land as warranting a review given the anomalous zone boundaries affecting these allotments (the industry/commercial site previously mentioned in this submission).

We support Council's initiative in drawing attention to these anomalies.

The Discussion Paper

The Discussion Paper explains that the Acts (for both districts) seek to ensure that the special character values of the Barossa Valley and McLaren Vale districts are protected from urban encroachment. Our client does not disagree with the need for such protections.

The Discussion Paper also correctly notes that *"interface impacts are seen in primary production areas where there are competing land uses, in particular the use of rural chemicals in close proximity to townships/dwellings. The Acts restrict the creation of additional allotments for residential purposes outside of township boundaries, therefore helping to minimise the occurrence of these land-use conflicts"*.



These particular impacts are familiar to our client, which continues to manage the vineyard as best it can despite its proximity to residential and other urban development virtually completely encircling the vineyard.

Action Sought

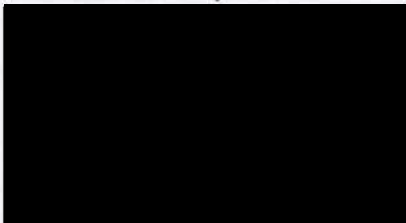
Our client respectfully requests that the Character Preservation Districts Map be amended to remove Allotment 12 in DP1931 from the Barossa Character Preservation District. We also suggest that the adjacent Neil Avenue residential enclave and the industrial/commercial site to the north be removed at the same time, because of the anomalous situation applying to those areas.

The removal of these three areas from the Barossa Character Preservation Districts Map will be consistent with the submission made by Light Regional Council, which correctly observes that *"the review provides an opportunity to consider the boundaries that both resolve an anomaly and allow for infill development on a site which has a number of operational constraints by virtue of its location adjacent to both residential and commercial activities"*.

The map attached to Council's submission identifies our client's land and two properties to the north of our client's land for review. We suggest that the Neil Avenue residential enclave to the immediate west of our client's land should be also be included, because it too represents an anomaly which could be rectified by appropriate amendment to the Development Plan.

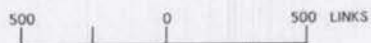
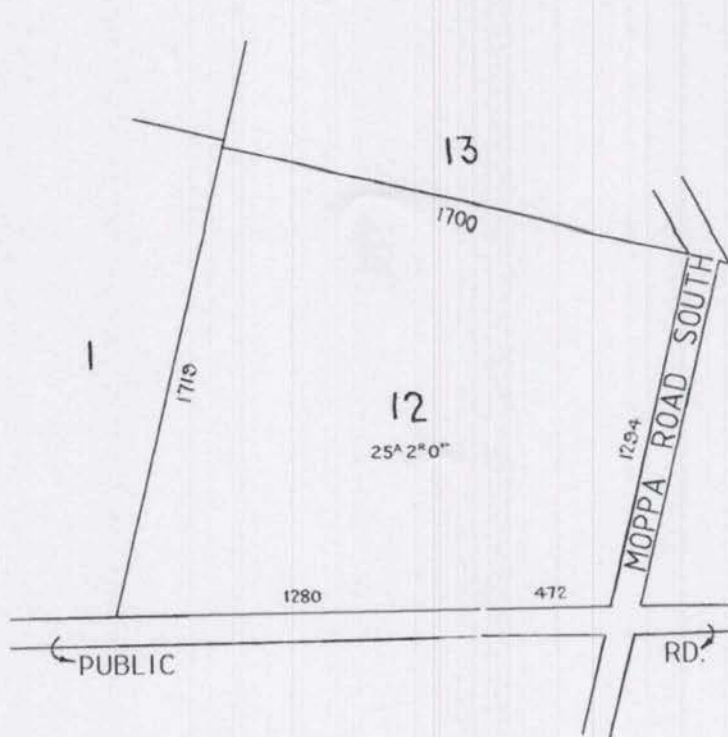
Our client's land, and the adjacent properties which should be removed from the Character Preservation District Map, are shown of the **enclosed** Barossa Preservation District Anomalies Map.

Yours faithfully



Graham Burns
MasterPlan SA Pty Ltd

enc: Certificate of Title.
Site Plan.
Barossa Preservation District Anomalies Map.



FOR METRIC CONVERSION	
1 LINK	= 0.201168 metres
1 CHAIN	= 100 LINKS
1 ACRE	= 0.404686 hectares
1 ROOD	= 1011.7 m ²
1 PERCH	= 25.29 m ²



1 LVS Admin Pty Ltd - Allotment 12
(130 - 138 Moppa Road South, NURIOOTPA)

SITE PLAN

NURIOOTPA WEST

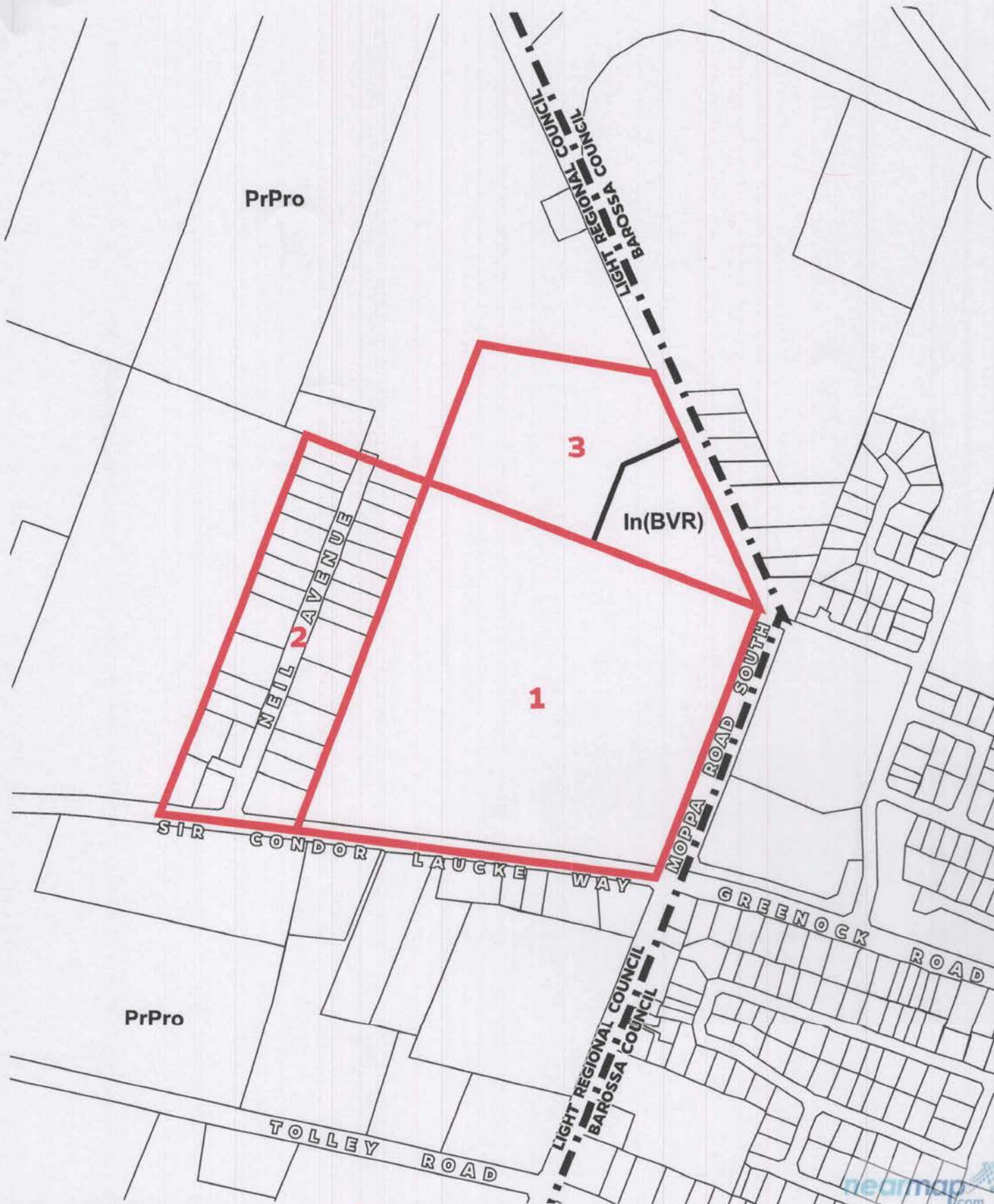
for LVS Admin Pty Ltd



1:5000 @ A4
0 100m

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MASTERPLAN
TOWN + COUNTRY PLANNERS

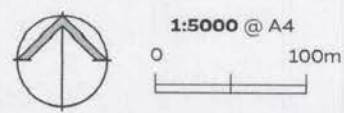


- Council Boundary
- Zone Boundary
- Subject Land
- In(BVR) Industry (Barossa Valley Region)
- PrPro Primary Production

- 1** LVS Admin Pty Ltd - Allotment 12
(130 - 138 Moppa Road South, NURIOTPA)
- 2** Neil Avenue Residential Allotments
- 3** Industrial / Commercial Property
(104 Moppa Road South, NURIOTPA & 94 Moppa Road South, NURIOTPA)

**BAROSSA
CHARACTER PRESERVATION
ANOMALIES MAP**

NURIOTPA WEST
for LVS Admin Pty Ltd



Ref: 61353
Doc ID: 265900



29 November 2017

Department of Planning, Transport & Infrastructure
GPO Box 1533
ADELAIDE SA 5001

By Email: DPTI.PlanningEngagement@sa.gov.au

Dear Sir/Madam

LRC Submission - Review of the *Character Preservation (Barossa Valley) Act 2012* – Discussion Paper

Thank you for providing Council with an opportunity to review and provide comments on the recently released review of the *Character Preservation (Barossa Valley) Act 2012* (the 'Act'). I note that Council officers have worked with Department of Planning, Transport & Infrastructure (DPTI) representatives in providing input to the discussion paper.

Whilst generally acknowledging the intent of the Act and its role in protecting agricultural land from inappropriate intrusion, the current review provides an opportunity to both highlight work already completed and underway in this space and to consider a number of elements including supporting policy, the state of the District and more particularly the boundary of the district.

Act Implementation

Section 6(2) of the Act requires that '*a person or body involved in the administration of an Act must, in exercising powers and functions in relation to the district, have regard to and seek to further the objects of the Act*'. It is observed that there is a perception that this requirement only applies to Councils as decision makers and Council certainly includes a statement in its development assessment to this effect. In particular, it is noted that this requirement applies equally to the decisions and actions of government departments (and respective Ministers) when considering activities within the District and compliance with Section 6(2) needs to be demonstrated at all levels of government.

Policy Support/Clarification

Overarching Policy

It is recognised that the implementation of the Act was supported by both the Ministerial *Barossa Valley and McLaren Vale – Revised – Protection Districts DPA* and the insertion of an addendum within the 30 Year Plan for Greater Adelaide (the 'Planning Strategy'). Together these amendments provide some level of guidance when seeking to undertake development assessment or strategic planning exercises.

It is however noted that the policy contained in Development Plans (via overlay) is a high level reflection of the objects of the Act and identification of the District mapping and provides little in the way of direction for both planners and the community. The Discussion Paper incorrectly identifies that Council Development Plans have been amended so that '*the local rules around planning and development reflect the objectives of the Character Preservation Acts and Planning Strategy*'. It is noted that this has not occurred despite the best efforts of Council to progress its *Barossa Protection Development Plan Amendment*, the Statement of Intent of which was submitted to DPTI in August 2015.

Since the Act's inception there has continued to be confusion within the community on how the district should be protected and what forms of development are appropriate. Whilst understood that the policy contained within the Planning Strategy is separate to that within Council Development Plans, much of

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Principal Office

93 Main Street, Kapunda, SA 5373

Fax: (08) 8566 3262

Light Regional Council ABN: 35 455 841 625

Branch Office

12 Hanson Street, Freeling, SA 5372

Fax: (08) 8525 2441

the finer detail is contained in this document and at this point it is yet to be reflected in Development Plans and therefore relevant and applicable policies.

This is further emphasised by anecdotal evidence received by Council officers overtime that there is disadvantage felt amongst Councils broadacre farming community due to the Act being regarded or perceived as being restrictive. In this, farmers have cited concern over elements of the Acts Objects and how these impact on the use of land and development (e.g. the siting and design of farm buildings) and a view that broadacre farmers are disadvantaged by the Act. For example, in many circumstances a farmer will seek to construct a farm building on an elevated section of their land in an area which has reduced productivity and is more difficult to utilise as part of the farming program. The Act however calls for development to not detract from the special character of the district, whilst conversely providing for the economic, social and physical wellbeing of the community. The ambiguity afforded by the Objects of the Act leads to confusion, may impact on efficient farming operations and has the potential to add significant cost to development.

In this context this productive sector reports that it feels the burden of responsibility for providing character landscapes of high amenity that are seemingly valued more than providing economically production flexibility to farmers.

Land Division/Boundary Re-alignment

Further to the above, the consideration of land division, and more particularly boundary realignment remains ambiguous and challenging. The Act is clear when it notes the prohibition of land division which creates additional allotments for residential development, however it is not clear when considering boundary realignment. An example of this would be a proposal to adjust the boundary of two primary production properties to create a single large primary industry title and a small 'rural-residential' lifestyle title.

Such proposals generally have not been supported to date, mainly due to the introduction of potential future interface conflict. However, the policy is not clear in these circumstances where the Act stands. It is recommended that additional content be inserted to reference a need for boundary realignment to result in all allotments meeting the current minimum allotment size for the zone. This would remove ambiguity and minimise any unintended increase in rural-residential lots.

The addition of policy to provide guidance in these respects and a clearer connection between the District and the character values is recommended.

Rural Interface

As the DPTI would be aware, Council participated in a Primary Industries and Regions, South Australia (PIRSA) Buffers Working Group on rural interface issues. This Group included representatives from the DPTI along with The Barossa Council, PIRSA, the Environment Protection Authority, Primary Producers SA and Grain Producers SA.

Whilst initially considering a range of matters, the Group narrowed its focus on the matter of rural interface/buffer conflict which may arise between different primary production land uses and most notably viticulture and broadacre farming. It became apparent throughout the process that the matter of rural interface was complex and there was not a one-size-fits-all solution and further consideration is needed. Whilst understanding the focus of the Act, the outcomes of this working group are brought to the attention of DPTI in relation to this review as outcomes may have an influence on the future character of the District.

District Boundary Review and Anomalies

Review

It is reasonable to observe that the Act's underlying intent to protect land from residential subdivision has been achieved, however there is an opportunity at this point to review the boundaries of the 'District' to allow sensitive and discreet consolidation of land to the immediate west of Nuriootpa.

The property in question is identified as 130-138 Moppa Road South, Nuriootpa (CT:5320/638) and currently accommodates a dwelling, business operation and small-scale vineyard. The land immediately adjoins the township of Nuriootpa and is bound by commercial development to the south, a residential development to the west and industry/residential development to the north. The current arrangements do not facilitate effective use of the property for primary industry purposes with day-to-day activities (such as spraying and harvesting) largely constrained by both the residential and commercial uses sharing a boundary with the property.

Consideration of a District boundary amendment in this location would not see a significant expansion of the township, nor contribute to an unreasonable supply of land for residential purposes. As described above, land to the west of the site is residential in nature accommodating the Neil Avenue estate.

Anomaly

In addition to the above request for a review and amendment to the Township boundary, there appears to be an anomaly with the boundary as declared to the west of Nuriootpa. In particular, it is observed that:

- A property used for residential purposes is located within the 'Township' – 94 Moppa Road South, Nuriootpa (CT:5499/54); whilst
- A commercial/business type property is located within the 'District' – 104 Moppa Road South, Nuriootpa (CT:5499/505).

This designation of properties may have arisen as a result of a previous zoning anomaly which identified 94 Moppa Road South as being zoned Industry (Barossa Valley Region) and 104 Moppa Road South as Primary Production. This zoning anomaly has subsequently been rectified through the *Nuriootpa West (Industry BVR Zone) Development Plan Amendment*.

The review provides an opportunity to consider the boundaries to both resolve an anomaly and allow for infill development on a site which has a number of operational constraints by virtue of its location adjacent both residential and commercial activities. A 'marked-up' Development Plan extract attached identifies the boundary amendments and anomalies.

Allied Activities

Council wishes to highlight activities currently being undertaken by a working group titled 'Barossa Collaboration'. This collaboration comprises representatives of Light Regional Council, The Barossa Council, Tourism Barossa, Barossa Food, Barossa Grape and Wine and the Barossa RDA. This group of industry representatives has secured funding from the State Government of \$100k and a combined \$50k respectively from the participating Council's to commence projects that promote the importance of value-adding opportunities within the Barossa Character Preservation District specifically.

This focus on activities within the District seeks to take a holistic approach to the evolving trends in industry and visitor preference. In a news release issued by State Member for Light, the Hon. Tony Piccolo MP he notes that the *"combined funds, with additional in-kind support from the two councils, will undertake the following projects:*

- *Review the planning and licencing regulations applicable to artisan food production.*
- *Further development of the Barossa "Trust Mark" brand.*
- *The development of a "Barossa Prospectus" to attract investment in small and start-up food ventures, and creative arts ventures.*
- *..."*

The collaboration recognises the importance of supporting value-add activities and the potential for necessary related policy amendments which seek to streamline and simplify land use opportunities. In this, policy amendments have already been proposed to Schedule 3 of the *Development Regulations 2008* to support and facilitate small scale value-add proposals.

The above actions and outcomes are noted at this early stage to both bring this to the attention of the DPTI and the Minister for Planning and to highlight the need to support these important initiatives which are tailored for the area identified as the District.

Please do not hesitate to contact me on telephone [REDACTED] should you wish to discuss the content of this letter further.

Yours sincerely

[REDACTED]

Andrew Chown
Manager, Strategy

Enc. Development Plan Extract showing anomalies and opportunities west of Nuriootpa



The Barossa Council

MINUTES OF THE MEETING OF THE BAROSSA COUNCIL

held on Tuesday 20 July 2021 commencing at 9.00am
in the Council Chambers, 43-51 Tanunda Road, Nuriootpa.

1. THE BAROSSA COUNCIL

1.1 WELCOME

Mayor Bim Lange declared the meeting open at 9.02am

1.2 MEMBERS PRESENT

Mayor Bim Lange, Deputy Mayor Russell Johnstone, Crs John Angas, Don Barrett, Leonie Boothby, David de Vries, David Haebich, Tony Hurn, Kathryn Schilling, Cathy Troup, Carla Wiese-Smith

1.3 LEAVE OF ABSENCE

Cr Richard Miller

1.4 APOLOGIES FOR ABSENCE

Nil

1.5 MINUTES OF PREVIOUS MEETINGS – FOR CONFIRMATION:

MOVED Cr Haebich

That the Minutes of the Council meeting held on Tuesday 15 June 2021 at 9.00am and the Special Council meeting held on Wednesday 7 July 2021 at 6.00pm, as circulated, be confirmed as true and correct records of the proceedings of those meetings.

SECONDED Cr de Vries

CARRIED 2018-22/496

1.6 MATTERS ARISING FROM PREVIOUS MINUTES

Nil

2021/622

Adelaide Area, which concluded that there is sufficient land supply in Greater Adelaide to support housing and employment growth over the next 15 years.

The Statement of Position paper concludes it is not necessary to remove any land from the Character Preservation Districts, therefore the Commission is not inviting further submissions regarding boundaries or other matters relating to CPD through this current EFPA boundary review process.

Members are reminded that changes to either Character Preservation District can only be achieved via a Bill through both houses of Parliament.

Discussion

A copy of Council's submission regarding the review of the CP Acts is provided for information (Attachment 2).

In Council's submission it requested the following map changes:

- Review inclusion of parts of the Adelaide Hills Council within the Barossa Valley district (i.e. Cromer, Forreston, Humbug Scrub, Kersbrook and Mount Crawford)
- Exclude industrial land at Angaston from the 'rural area' and either introduce a special 'designated area' as was done for rural living areas or include in a 'township'
- Include the identified area west of Nuriootpa within the Nuriootpa township. This area is within Light Regional Council and comprises the Neil Avenue residential enclave and the land between that street and Moppa Road to the east. That area has been identified for potential future residential development, a concept which The Barossa Council would not oppose.

In response to the review of the CP Acts, there were four main recommendations had been made:

- (1) Retain the legislation.
- (2) The State Planning Commission investigate the merit of requested boundary amendments in the context of Greater Adelaide's growth.
- (3) Introduce a statutory review process that provides for future boundary changes to follow the same process as reviews of Environment and Food Production Areas.
- (4) Provide for greater consistency and clarity of policy within the character preservation districts through the Planning and Design Code, in particular to provide further clarity on the envisaged/desired primary production value-adding and tourism activities in the character preservation districts.

The Review Outcomes Report of the CP Acts, detailed the following amendment to Nuriootpa.

"A boundary amendment proposal was received for western Nuriootpa which demonstrates particular merit, based on the information provided. This area is within Light Regional Council and comprises the Neil Avenue residential enclave and the land between that street and Moppa Road South to the east (see Figure 5). Moppa Road South forms the local government boundary between Light Regional Council and The Barossa Council.

Neil Avenue properties are connected to The Barossa Council's Community Wastewater Management System and this area is an area that has been identified by Light Regional Council for potential future residential development. This concept is also supported by The Barossa Council and the registered proponent of the land.

The Neil Avenue properties are not within the township boundary and effectively land locks the primary production land in between residential development. Consequently, the current arrangements do not facilitate effective use of the land for primary industry purposes with day-to-day activities (such as spraying and harvesting) largely constrained by both the residential uses to the west and commercial uses to the south.

This non-inclusion of the Neil Avenue properties and adjacent land in the township boundary appears to have been overlooked in the original township mapping, due to the boundaries being based largely on zoning and the Neil Avenue properties being zoned Primary Production (see Figure 5). An opportunity exists to correct this, provided the proposal is properly investigated and the land is concurrently rezoned"

Figure 5: Boundary amendment proposal received, Nuriootpa



As stated above, the Commission had resolved not to remove any land from the CPD.

Summary and Conclusion

The State Planning Commission is seeking comments on the Environment and Food Production Area (EFPA) and Character Preservation District (CPD) Boundary Review.

Noting that the Commission likely to only consider variations of the EFPA boundary that are trivial in nature, it is still recommended that Council make a submission that reflects on the previous submission on the review of the CP Acts.

DTI:PlanSA Submissions

From: Emily Nankivell [REDACTED]
Sent: Monday, 6 November 2023 8:09 AM
To: DTI:PlanSA Submissions
Cc: Chloe Vounasis
Subject: Submission to the Discussion Paper on the Greater Adelaide Regional Plan - Frisby Road, Angle Vale
Attachments: GARP Submission Frisby Road, Angle Vale.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Growth Management Team,

Please see **attached** submission to the Discussion Paper for the Greater Adelaide Regional Plan in relation to Lot 271 Frisby Road, Angle Vale.

Please confirm receipt of the submission.

Kind regards,

EMILY NANKIVELL
Associate Director



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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November 6, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001
Via email: plansasubmissions@sa.gov.au

Dear Mr Holden,

SUBMISSION TO THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for the owner of Lot 271 Frisby Road, Angle Vale in Certificate of Title Volume 5811 Folio 680 (the land) and demonstrated in **Figure 1**.

Figure 1 Land and Current Zoning



By way of background:

- Development application 22024173 to subdivide the land to create 285 residential allotments and one balance allotment (lot 1000) was submitted to the City of Playford (the Council) in July 2022; and
- Planning and land division consent was granted to the application by the Council in April 2023. A copy of the decision notification form and approved plan of division are **enclosed**.

Lot 1000 in the approved plan of division is a large allotment of some 2.994 hectares, intended for future use as a local activity centre. The land within the Master Planned Township Zone and the Emerging Township Activity Subzone (Subzone) of the Planning and Design Code (Code). The Subzone supports “*activity centres, employment, and community services [making] neighbourhoods a healthy and convenient place to live*”. The pre-condition in the Code for the Subzone to apply to an activity centre is that the activity centre needs to be identified on either a building envelope plan or a concept plan, which has not occurred in this instance.

An economic analysis has been commissioned to assess the viability of creating a retail and commercial development on Lot 1000. The economic analysis confirmed:

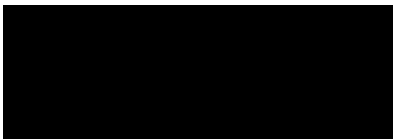
- At full development, the main trade area (MTA) for the proposed activity centre will accommodate a population in the order of 37,630 persons, an increase of over +27,000 persons on current levels.
- The strong performing Bunnings immediately east of Lot 1000 demonstrates the accessibility of the location to the surrounding community.
- The strong population growth forecast for the MTA supports demand for a wide range of retail, commercial and community facilities. This includes the potential for over 76,000m² of retail floorspace to be supported by local demand.
- The ability of current and proposed centres to meet the anticipated growth in demand will be critical in ensuring that the population is adequately served by an appropriate range and scale of facilities to meet their lifestyle needs.
- High-level economic assessment of Lot 1000 and the surrounding urban context, both currently and in the future, indicates that a commercial/retail precinct can be supported in this location in a manner complementary to other existing and proposed centres.

The Greater Adelaide Regional Plan (GARP) Discussion Paper identifies the need for land supply to deliver growth outcomes that support the concept of “living locally”, which includes local conveniences and services that are in close proximity to residential development. Identifying Lot 1000 as an activity centre though the GARP is supported and will ensure that:

- the aspirations of Lot 1000 as a retail and commercial activity centre are realised by enabling its inclusion as such in the Code through a Concept Plan;
- essential local services can be delivered to the local community; and
- the “living locally” concept can be realised.

Thank you for your consideration of this submission.

Yours sincerely,

A solid black rectangular box used to redact the signature of Chris Vounasis.

Chris Vounasis
Managing Director

Encl Decision Notification Form
 Approved Plan of Division

DECISION NOTIFICATION FORM

Section 126(1) of the Planning, Development and Infrastructure Act 2016

TO THE APPLICANT(S):

Name: Trinity T4 Pty Ltd
Postal address: C\ - Alexander Symonds Pty Ltd, PO Box 1000 Kent Town SA 5071
Email: [REDACTED]

IN REGARD TO:

Development application no.: 22024173	Lodged on: 15 Jul 2022
Nature of proposed development: Land Division - 1 into 297 residential allotments, roads and reserves.	

LOCATION OF PROPOSED DEVELOPMENT:

Location reference: LOT 271 FRISBY RD ANGLE VALE SA 5117		
Title ref.: CT 5811/680	Plan Parcel: F163239 AL271	Council: CITY OF PLAYFORD

DECISION:

Decision type	Decision (granted/refused)	Decision date	No. of conditions	No. of reserved matters	Entity responsible for decision (relevant authority)
Planning Consent	Granted	16 Apr 2023	10	1	Assessment Manager at City of Playford
Land Division Consent	Granted	16 Apr 2023	23	0	Assessment Manager at City of Playford
Development Approval - Planning Consent; Land Division Consent	Still Required				City of Playford

FROM THE RELEVANT AUTHORITY: Assessment Manager - Section 96 - Performance Assessed at City of Playford
Date: 16 Apr 2023

RESERVED MATTERS

Planning Consent

Pursuant to section 102 (3) of the Planning, Development and Infrastructure Act of 2016, the following matter(s) shall be reserved for further assessment prior to the granting of Development Approval:

The Applicant or person(s) having the benefit of this consent is required to execute and provide proof of the noting on the title of the Land, of a Land Management Agreement which secures public realm treatments and external infrastructure contemplated in the Infrastructure Agreement dated 12 April 2023 between the Applicant and the Council, required as part of this development. Such Land Management Agreement shall be agreed with Council prior to execution

CONDITIONS

Planning Consent

Condition 1

The development must be undertaken, completed and maintained in accordance with the plan(s) and information detailed in this Application except where varied by any condition(s) listed below

Condition 2

All landscaping should be in general accordance with the landscape masterplan prepared by Outer Space, titled '23 North Development ' dated 11/10/2022 with works to be completed for any stage prior to Section 138 Clearance.

Reason: To maintain the amenity of the site and locality.

Condition 3

The detailed design of the stormwater management system (including swales) must be established in accordance with the treatment train and design specifications contained within the report prepared by *MLEI Consulting Engineers, titled Lot 271 Frisby Road, Angle Bale Stormwater Management Plan' Ref: A2021-11846 September 2022* and must:

- a. Ensure downstream stormwater infrastructure has sufficient capacity to adequately capture and treat the runoff from the approved division
- b. Ensure runoff is maintained at predevelopment levels.
- c. Ensure groundwater resources are not impacted.
- d. Mitigate flood risk.

Condition 4

Prior to construction of landscaping works commencing within any reserve shown on the plan of division, detailed landscaping plans shall be submitted and approved by Council.

Condition 5

The detailed design of the storm water management system must be established to meet the following quality targets:

- a. suspended solids (SS) . 80% reduction of the typical urban annual load with no treatment
- b. total phosphorus (TP) . 60% reduction of the typical urban annual load with no treatment
 1. total nitrogen (TN) . 45% reduction of the typical urban annual load with no treatment

So as to ensure runoff is maintained at pre development levels ensure groundwater resources are not impacted and ensure the stormwater management system is adequately maintained

Condition 6

All storm water shall be managed in an orderly manner and in accordance with the Stormwater Management Plan as prepared *MLEI Consulting Engineers, titled Lot 271 Frisby Road, Angle Bale Stormwater Management Plan' Ref: A2021-11846 September 2022*, so that it does not flow or discharge onto land of adjoining owners or, in the opinion of Council, detrimentally affect structures on this site or any adjoining land.

Reason: To ensure storm water is disposed of in a controlled manner.

Condition 7

Prior to construction commencing, a Soil Erosion and Drainage Management Plan (SEDMP) must be prepared in accordance with the EPA's Code of Practice for the Building and Construction Industry and submitted to the reasonable satisfaction of the City of Playford. The SEDMP must be implemented during construction to prevent soil sediment and pollutants leaving the site or entering waters (including stormwater system) during development of the site. The SEDMP must include elements such as:

- a. The installation of a shaker pad at the entrance/exit to the development site
- b. Avoiding unnecessary cut and fill and unnecessary clearing of vegetation
- c. Protecting exposed soil through temporary vegetation or jute matting, hay bales or silt fences, and fencing and containing of stockpiles.

Condition 8

Road reserves must only be paved and filled with materials that are in accordance with section 5 of the Council's Land Division Requirements (2022), Aus Roads Standards and Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia, and such filling must be supervised and subsequently certified by a professional engineer, to the Council's satisfaction.

Condition 9

Adequate provision shall be made for the creation of appropriate easements and reserves for the purposes of drainage, electricity supply, water supply and sewerage services. Any drain which is located within balance land is to be granted a drainage easement in favour of Council prior to any discharge to or use of the drain.

Condition 10

Any drain which is necessary for the safe and efficient drainage of the land and the disposal of stormwater and effluent from the land shall be provided and constructed on the land in accordance with recognised engineering practice and shall be to the satisfaction of the Council.

Land Division Consent

Condition 1

Pursuant to section 198 of the *Planning, Development and Infrastructure Act 2016* (the **Act**), a financial contribution of **\$432,725.76** (at a rate of **\$1518.34 per allotment**) must be paid to the Council in lieu of vesting land in the Council to be held as open space (other than where indicated on the plan of division). The financial contribution must be paid either:

- i. in full and prior to any clearance of any allotment under section 138 of the Act; or
- ii. in stages at the rate of **\$1518.34 per allotment** cleared and prior to clearance under section 138 of the Act for that relevant stage (as shown on the plan of division approved by Council).

Condition 2

Upon the completion of all works associated with a relevant Stage as approved herein, all drainage infrastructure that is necessary to be installed on the land so as to ensure that all roads and allotments that are created within that Stage can be adequately drained, shall be constructed in accordance with the report prepared by *MLEI Consulting Engineers, titled Lot 271 Frisby Road, Angle Bale Stormwater Management Plan* Ref: A2021-11846 September 2022, to the satisfaction of the Council.

Condition 3

All roads and drainage infrastructure associated with the approved development shall be constructed in accordance with the Council's Land Division Requirements (2022, Land Division - City of Playford) and Standard Drawing(s) suite LibraryView - IPWEA South Australia and shall be to the Council's satisfaction.

Condition 4

All bridges, culverts, underground drains and inlets reasonably necessary for any proposed road forming part of the development shall be constructed on the land, in accordance with recognised engineering practice and shall be in accordance with the Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia and shall be to the Council's satisfaction.

Condition 5

All side entry pits associated with the approved development shall be constructed in accordance with the Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia shall be located and constructed on the land to the Council's satisfaction.

Condition 6

Road reserves shall be provided in accordance with the approved plan prepared by Alexander Symonds Surveying consultants ref 21A1292PROP (E) revision E dated 10/01/2023 and the Council's Land Division Requirements (2022, Land Division · City of PlayfordLand Division · City of Playford)), to be:

- (a) 6.5 metres minimum width for any laneway;
- (b) 15.4 metres minimum width for any local road;
- (c) 20.0 metres minimum width for any collector road (without a central median); and
- (d) 24.0 metres width for any collector road with a central median,

to the Council's satisfaction.

Condition 7

Road carriageways shall be constructed in accordance with the Council's Land Division Requirements (2022, Land Division · City of Playford), to be:

- (a) 5.5 metres minimum width for any laneway;
- (b) 7.2 metres minimum width for any local road;
- (c) 7.2 metres minimum width for any collector road (without a central median); and
- (d) 3.2 metres width (for each carriageway) for any collector road with a central median,

to the Council's satisfaction.

Condition 8

Indented parking bays shall be supplied adjacent all reserves on the land in accordance with the Council's Land Division Requirements (2022, Land Division · City of Playford), and shall be to the Council's satisfaction.

Condition 9

Any indented parking bays on roads are to be constructed in accordance with the Council's Land Division Requirements (2022, Land Division · City of Playford) and further within Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia

Condition 10

All road verges shall be no less than:

- (a) 1.0 metre wide on one side in the case of a laneway;
- (b) 2.6 metres wide on both sides of any local road;
- (c) 2.7 metres wide on both sides of any collector road (without a central median); and

(d) 2.0 metres wide on both sides of any collector road with a central median,

when measured from the inside face of the adjoining kerb, in accordance with Council's Land Division Requirements (2022, Land Division · City of Playford) and shall be to the Council's satisfaction.

Condition 11

Footpaths of at least 1.5m width shall be constructed on both sides of all local roads and collector roads (without a central median), and shared paths of at least 3m width shall be constructed on both sides of collector roads with a central median, and shall be constructed in accordance with the Council's Land Division Requirements (2022) and Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia to the Council's satisfaction.

Condition 12

All roads shall be designed in such a way so as to provide for the safe movement of all road users within the approved development, to the satisfaction of the Council.

Condition 13

The width of the road at the head of every cul-de-sac must be at least 20 metres for a length of not less than 20 metres, or such other dimensions as may be acceptable to the Council, provided such dimensions are first approved in writing by the relevant authority. Adequate provision shall be made for the turning of vehicles at the head of a cul-de-sac, being no less than a 9m turning radius.

Condition 14

Footpaths shall be constructed using block pavers, or concrete paving (exposed aggregate or broom finished) in accordance with the Council's Land Division Requirements (2022) and Council's Standard Drawing and Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia and shall be to the Council's satisfaction.

Condition 15

Shared paths shall be constructed using in accordance with the Council's Land Division Requirements (2022, Land Division · City of Playford) and Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia and shall be to the Council's satisfaction.

Condition 16

All paved footpaths associated with the development shall be constructed in accordance with the Council's Land Division Requirements (2022, Land Division · City of Playford) and the Council's Standard Drawing(s) suite LibraryView - IPWEA South Australia and shall be to the Council's satisfaction.

Condition 17

All necessary electrical services shall be installed on the land in accordance with recognised engineering practice, to the satisfaction of the Council.

Condition 18

Department of Energy & Mining Condition 1

4. All service crossings over the Port Campbell to Adelaide Pipeline (PCA) (including stormwater, sewerage, water and common service trenches) must:

a. include the installation of HDPE protection slabs or concrete slabs above the PCA, designed and constructed to the minimum standards noted below;

- i. For a concrete slab;
 - 1. a minimum of 500mm vertical separation between the slab and the PCA;
 - 2. a minimum 350mm overhang of slab on either side of the PCA;
 - 3. a minimum 200mm thick.
 - 4. the concrete is to be cast in situ and located centrally over the pipeline.
 - 5. no reinforcement is to be put in the slab, and the minimum compressive strength shall be 20MPa at 28 days.
 - 6. Pipeline warning marker tape shall be installed at a depth of cover of 200-300mm directly above the pipeline.
- ii. For an HDPE slab;
 - 1. the slab shall be 1200mm wide
 - 2. the slab shall have a depth of cover of 300-500mm
 - 3. the slab shall be a minimum of 15mm thick
 - 4. the slab shall be installed directly over the pipeline
 - 5. the words "DANGER HIGH PRESSURE GAS PIPELINE BELOW" shall be embossed into each slab, with letters 50mm high.
- b. be designed and constructed (including the concrete slabs or HDPE protection slabs) to ensure that they do not adversely impact the PCA, including by;
 - i. a minimum of 500mm vertical separation between the service and the PCA. to the reasonable satisfaction of the relevant authority. Details of the method of design and construction of all service crossings (including HDPE protection slab or a concrete slabs) must be provided to the relevant authority prior to construction.

Condition 19

Department of Energy & Mining Condition 2

The applicant must provide notice to the pipeline licensee at least one week prior to the commencement of the following works: a. any works within 6 metres of the PCA, including service work, road upgrades, road construction, geotechnical excavation or potholing; and b. the removal of any power poles.

Condition 20

Department of Energy & Mining Condition 3

Within 20m of the PCA, excavator size must not exceed 27 Tonnes and tiger teeth or single point penetration teeth must not be used, unless otherwise agreed in writing by the relevant authority.

Condition 21

Department of Energy & Mining Condition 4

- 4. Prior to the commencement of any earthworks within 20 metres of the PCA or the introduction of heavy machinery within 20 meters of the PCA, the applicant must provide the relevant authority with plans and documents, to its reasonable satisfaction, addressing the following aspects of detailed design and construction:
 - a. a Safe Work Method Statement for the construction of the sewer infrastructure under the PCA, including construction methodology, equipment proposed to be used and whether the service will be bored or open trench exposing the PCA;
 - b. the method of design and construction of the shallow cover common service trench (CST), which must have a vertical separation of not less than 500mm from the PCA, unless otherwise agreed in writing by the relevant authority;
 - c. the vibration monitoring equipment which will be used, the manner in which such equipment will be monitored, and the steps which will be taken to cease work (if required), should: i. vibrating rollers or other vibrating equipment be used within 10m of the PCA; or ii. road planing be undertaken within 10 meters of the PCA;
 - d. identification of the depth of cover between ground level and the PCA, confirmed by undertaking potholing of the PCA;
 - e. the signage the applicant proposes to erect

f. all Telstra and/or SA Power Networks infrastructure which is proposed to be removed or relocated, including both current and proposed locations, and details of the process for removal, including how foundations will be removed (if at all).

The development must then be undertaken in accordance with the plans and documents which have met the relevant authority's reasonable satisfaction.

Conditions imposed by SPC Planning Services under Section 122 of the Act

Condition 22

A final plan complying with the requirements for plans set out in the Manual of Survey Practice Volume 1 (Plan Presentation and Guidelines) issued by the Registrar General to be lodged with the State Planning Commission for Land Division Certificate purposes.

Conditions imposed by South Australian Water Corporation under Section 122 of the Act

Condition 23

The necessary infrastructure for this development is likely to be constructed by the developer under a Land Development Agreement.

In order to facilitate clearance, SA Water's easement, financial and Augmentation requirements shall be met by the developer.

A sewerage pumping station with dedicated site, all weather vehicular access and approx. 2.3km of pumping main is required to service the development. Land for the pump station site is to be vested to SA Water.

Water requires a 200mm branch and main constructed off the existing 500mm main in Curtis Rd and extended along Frisby Rd to service abutting allotments. A 200mm branch is to extend into development to service remaining allotments.

If a connection/s off an existing main is required, an investigation will be carried out to determine if the connection/s to your development will be costed as standard or non-standard.

ADVISORY NOTES

Planning Consent

Advisory Note 1

1. Please note that an Infrastructure Agreement has been established between Council and the applicant with regard to the provision certain works related to this application. Works detailed within this agreement must be completed prior to any clearance being issued with respect to the land.

2. The applicant is reminded of its general environmental duty, as required by Section 25 of the *Environment Protection Act*, to take all reasonable and practicable measures to ensure that the activities on the whole site, including during construction, do not pollute the environment in a way which causes or may cause environmental harm.

3. If during any site works, contamination is identified which poses actual or potential harm to the health or safety of human beings or the environment that is not trivial, taking into account the land use, or harm to water that is not trivial, the applicant may need to remediate the contamination in accordance with EPA guidelines.

4. EPA information sheets, guidelines documents, codes of practice, technical bulletins etc can be accessed on the following web site: <http://www.epa.sa.gov.au>

5. The proposed development is within the vicinity of the Port Campbell to Adelaide Pipeline (PCA). The applicant is reminded that under section 93 of the Petroleum and Geothermal Energy Act 2000 (PGE Act), a

person must not interfere with activities regulated under the PGE Act which are lawfully conducted under a licence.

6. The South Australian section of the PCA is licenced to SEA Gas. Direct contact with SEA Gas on this matter should be through Michael Jarosz on (08) 8236 6836.

7. It is recommended that the applicant request SA Water design the water main system such that individual crossings of the PCA for allotments are not required.

8. All parties carrying out works approved herein are recommended to attend a pipeline awareness session administered by the pipeline licensee prior to commencing work.

9. Once all detailed design has been submitted to the relevant authority to its reasonable satisfaction in accordance with the conditions attached to this authorisation, the applicant will be invited to attend a further safety management study workshop conducted by the pipeline licensee.

Advisory Notes imposed by Commissioner of Highways under Section 122 of the Act

Advisory Note 2

The site is subject to the terms described within the Angle Vale Road Infrastructure Deed. The deed requires a Landowner's Contribution to be paid within 14 days of the Lands Titles Office issuing an Approval of Data Notice for each stage of the land division.

Land Division Consent

Advisory Notes imposed by DPTI Mark Maintenance under Section 122 of the Act

The following development application has been examined for PSM requirements: (see attachment)

DA292/D463/22 App ID 22024173

7 PSM's are required to be placed at the positions marked on the attachment.

The following numbers shall be used: **6628/63559 – 6628/63565**

The new PSM's must be witnessed.

The following is to be supplied once the PSM's have been placed:

- Location sketches
- MGA 2020 coordinates

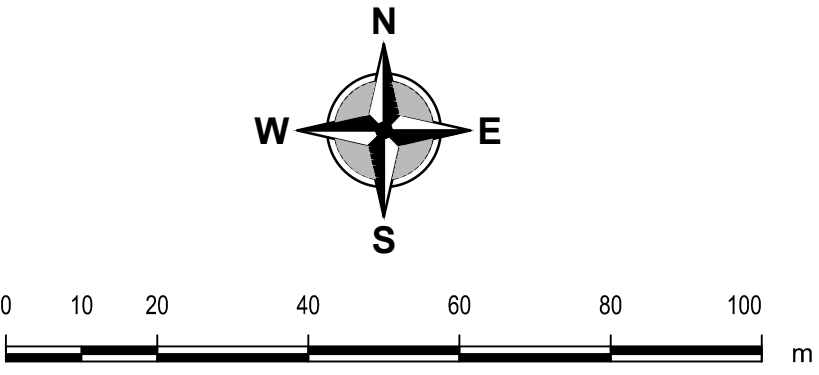
CONTACT DETAILS OF CONSENT AUTHORITIES

Name: City of Playford	Type of consent: Planning and Land Division
Telephone: 8256 0331	Email: plan@playford.sa.gov.au
Postal address: 12 Bishopstone Road, Davoren Park SA 5113	

PlanSA 22024173
Development No. 292 / D463 / 22
City of Playford

Proposed Plan of Division
Allotment 271 in F163239
Hundred of Munno Para
in the area named
ANGLE VALE

CT 5811/680
Registered Proprietor: Costantino Melino,
Anthony Melino



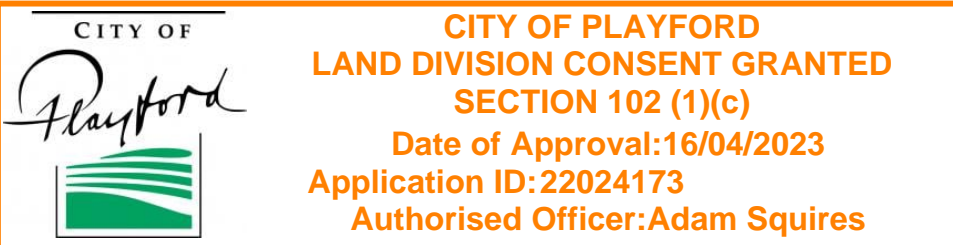
1:1000 @ B1

AMENDED PLAN

05.09.2022

AMENDED PLAN

10.01.2023



- 3m wide shared footpath
- 1.5m wide local footpath
- 1.5m wide local footpath to Miravale

No. of proposed residential allotments	285
Balance allotments	1
Total area	23.72ha
Development area	20.73ha
(Total less Balance Allotment)	
Total reserve area	3.641ha
Contributed reserve area	(10.1%) 2.084ha
(50% credit on drainage reserve)	
Length of new roads	2945m

All road reserve widths are 15m unless specified.

Contour interval 0.2m.
Datum: AHD.

Road pavements shown are indicative only.

****Not to be used for detailed engineering design.****

Dimensions and areas are subject to survey.

© ALEXANDER & SYMONDS PTY. LTD. Original Sheet Size B1	
Glenn Ian Hordacre	
LICENSED SURVEYOR	
REF:	21A1292
DWG NO.:	21A1292PROP(E)
REVISION:	E
RHF/DEL:	10.01.2023

Alexander & Symonds Pty Ltd
11 King William Street Kent Town,
South Australia 5067
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+ Property + Land Development +
+ Construction + Mining +
+ Spatial Information Management +



DTI:PlanSA Submissions

From: Belinda Monier [REDACTED]
Sent: Wednesday, 11 October 2023 2:59 PM
To: DTI:PlanSA Submissions
Cc: Chloe Vounasis
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP DP Submission on behalf of Proponent - Penfield.pdf

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Good afternoon,

Please find attached a submission on the Greater Adelaide Regional Plan Discussion Paper on behalf of three landowners in Penfield.

Kind regards,

BELINDA MONIER
Senior Consultant



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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October 11, 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001

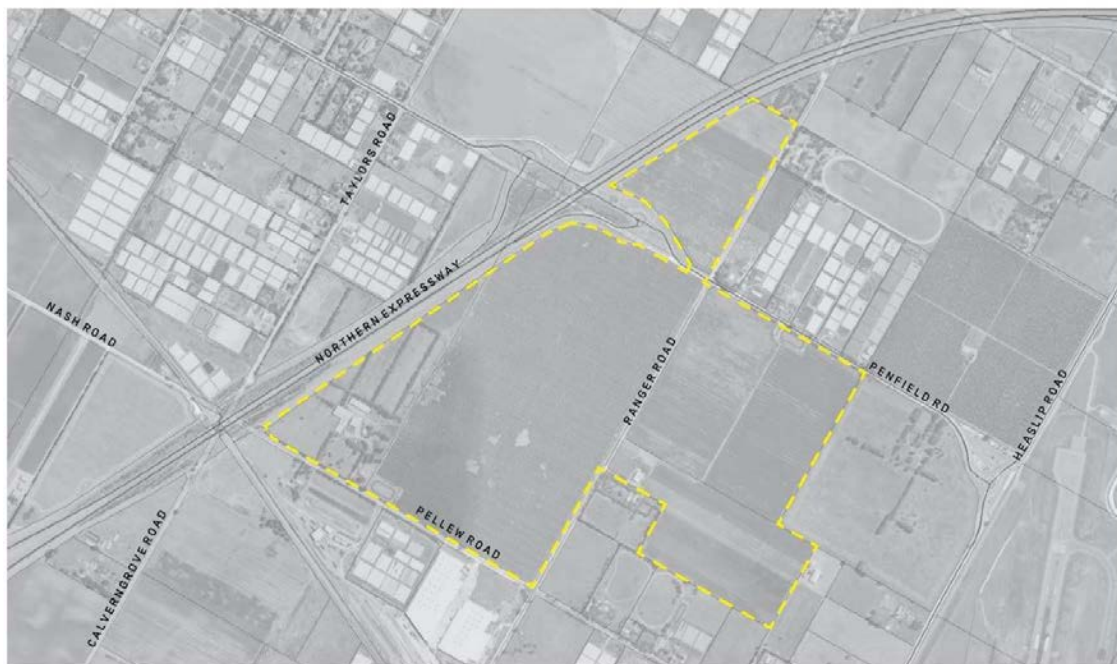
Via email: plansasubmissions@sa.gov.au

SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for three separate landowners, namely Maranello Holding Pty Ltd, M & B Farmer Nominees Pty Ltd and Clinton Duane Zerella ("the Proponent"). The collective landholding under the care and control of the Proponent comprises a significant 150 hectares of land bound by Penfield Road, Ranger Road, Pellew Road and the Northern Expressway in Penfield. The land holding is identified in Figure 1 below and is currently identified in the 30-Year Plan for Greater Adelaide as 'new strategic employment lands'.

The Proponent intends to rezone all of the land from the existing Rural Horticulture Zone to the Strategic Employment and/or Employment Zone.

Figure 1 *Land holding*



Affected Area | LEGEND
— Affected area boundary



The Greater Adelaide Regional Plan Discussion Paper maintains the strategic vision for the area and identifies the Affected Area as 'Future Employment Land'. The Proponent supports this inclusion in the Greater Adelaide Regional Plan and commends the State Planning Commission (SPC) for recognising the critical role that employment lands play in South Australia's economy.

While the Proponent supports the position of SPC, it notes there is very little detail in regards to employment land data. The Discussion Paper states that there is an estimated 25-44 years of employment land supply, however, the amount of vacant employment land is not identified. While the Land Supply Report has been recently released for residential land, the latest Employment Land Supply Report is dated 2021 and was based on data prior to the introduction of the Planning and Design Code. Data in that report is highly skewed by land in Gilman, which is largely not development ready, however, is shown as vacant. The report also shows the Bolivar Wastewater Treatment Plant as employment land, which accounts for 1,245 hectares of land.

The Employment Land Supply Report needs to be updated to reflect the Planning and Design Code and current data sets. We now have an online planning system with capabilities of supplying real time data and the new GARP should be based on the most recent data, which is particularly critical post the COVID-19 pandemic. New employment land analysis should also factor in the impending completion of the North-South Corridor.

Location is a critical factor in employment land investment and we strongly urge the SPC to not view land supply in large regions. For example, the Outer North Region has sub-regions, most relevantly in this case, Greater Edinburgh Parks (GEP). GEP has different locational attributes to say Roseworthy, that would drive significant investment to a level considerably higher than Roseworthy, should development ready land be made available. The Discussion Paper rightly identifies that since COVID-19, there is increased demand for manufacturing and warehousing as we reduce our reliance on overseas supply chains. These land uses are ideally located next to freight connections. This means that any land in close proximity to the North-South Corridor is likely to be in high demand.

According to the Knight Frank National Industrial Report August 2023, Adelaide recorded the highest quarterly industrial prime rental growth over Quarter 2, 2023. The report provides an insight into the demand and strong growth of the industrial sector in northern Adelaide:

"The main storyline of Adelaide's industrial market of late, has been the emergence of the northern precincts as market heavyweights, particularly the Outer North... The Outer North's allure for development is primarily driven by its accessibility and cost-effectiveness of land, bolstered by the north/south connector. As a result, the Outer North precinct is expected to see a surge in investment and development activity in the forthcoming years." (pg 12)

However, this growth cannot occur if there is no available zoned land. Anecdotal evidence suggests that there is actually less than 5 years of supply in the Greater Edinburgh Parks area. For such a significant strategic area in close proximity to key infrastructure, the release of new employment land is critical and necessary to satisfy demand, and importantly, support the strong residential growth that is occurring in the region.

The Future Employment Land in northern Adelaide has been recognised as such since the 2010 version of the 30-Year Plan. With the introduction of the *Planning, Development and Infrastructure Act 2016* (PDI Act), and the ability for private landowners to pursue Code Amendments, the Future Employment Land in the northern region has become highly sought after and is currently being pursued by various Proponent-led Code Amendments.

The Proponent (as a collective) have reached agreement to propose a Code Amendment that seeks to rezone the land from the Rural Horticulture Zone to the Strategic Employment Zone and/or Employment Zone and have yet to lodge the Proposal to Initiate. We are aware that there are a number of other Proponents seeking to rezone land within the area identified in the Discussion Paper.

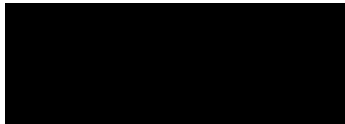
The Proponent is aware that infrastructure upgrades are required at a regional level and must be coordinated. A working group has been established to bring together the City of Playford, City of Salisbury, Department for Infrastructure and Transport, SA Water and other consultants facilitating Code Amendments in the wider area.

The Proponent is committed to continue working with the appointed working group to resolve infrastructure at a regional level, however, progressing the Code Amendment can occur concurrently with this process to ensure that land can be bought to market as quickly as possible. The land under the control of the Proponent is strategically located at the Northern Expressway entry/exit ramp and will act as a significant catalyst in the regeneration of the area to drive investment in much needed infrastructure and employment land.

In summary, it is suggested that SPC:

- Update the Employment Land Supply Report to reflect the Planning and Design Code and current data sets;
- Consider land supply in the context of sub-regions to provide a clearer picture of supply and demand within comparable geographic areas; and
- Expediate the release of new employment land to satisfy demand and support the strong residential growth that is occurring in the region.

Yours sincerely,



Chris Vounasis
Managing Director

DTI:PlanSA Submissions

From: Belinda Monier [REDACTED]
Sent: Thursday, 5 October 2023 3:19 PM
To: DTI:PlanSA Submissions
Cc: Chloe Vounasis
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP DP Submission on behalf of Pierson Pty Ltd.pdf

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Good afternoon,

Please find attached a submission on the Greater Adelaide Regional Plan Discussion Paper on behalf of Pierson Pty Ltd, the Proponent for the 25 Pierson Street, Lockleys Code Amendment.

Kind regards,

BELINDA MONIER
Senior Consultant



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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5 October 2023

State Planning Commission
C/- Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815,
ADELAIDE SA 5001

Via email: plansasubmissions@sa.gov.au



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Adelaide SA 5000
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E: info@futureurban.com.au
ABN: 76 651 171 630

SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for Pierson Pty Ltd, the Proponent for the 25 Pierson Street, Lockleys Code Amendment. We prepare this submission on the Greater Adelaide Regional Plan (GARP) Discussion Paper on behalf of the Proponent.

As you would be aware, the Proponent sought to rezone 25 Pierson Street, Lockleys, a 5-hectare site which is currently in the Employment Zone. The Code Amendment sought to rezone the land to the Urban Neighbourhood Zone to facilitate a range of dwelling types, densities and complementary low-scale non-residential uses. The Code Amendment was declined by the Minister in December 2022. The following explanation was provided by the Minister for Planning, the Honourable Nick Champion MP (the Minister):

"Whilst I acknowledge the value of the land as a strategic infill site, I note the significant concerns of the community regarding the proposal and the amenity impacts such higher density development would have in a low-rise, mid-block location such as this. As such, I consider the Code Amendment inappropriate.

However, I would be willing to consider a new Code Amendment to explore the rezoning of the subject site to the Suburban Neighbourhood Zone (or similar), to facilitate the redevelopment of the site that is more in keeping with the established character of the area. In exploring a new Code Amendment of such nature, I would also encourage the provision of open space and improved linkages to the River Torrens Linear Park".

[underline our emphasis]

The Minister acknowledges the site as "strategic infill" and is worthy of being rezoned to support residential development. Having obtained this position of the Minister, a revised Code Amendment is currently being pursued by the Proponent.

The Greater Adelaide Regional Plan Discussion Paper notes that historically Greater Adelaide has been dominated by detached housing on large blocks of land and there are many other types of housing – the 'Missing Middle' – that offer affordable, well-designed and well-located options for our changing demographics.

Addressing the Missing Middle means providing more affordable housing choices in inner metro areas. 25 Pierson Street, Lockleys is a prime example of an inner metro site that can deliver housing in response to changing demographics and housing affordability.

The revised 25 Pierson Street, Lockleys Code Amendment was initiated by the Minister on 6 July 2023. The Code Amendment seeks to facilitate Missing Middle housing, as proposed in the GARP Discussion Paper. The GARP Discussion Paper also discusses the appropriateness of strategic infill sites to facilitate Missing Middle housing as they are generally more economic to service than general infill. 25 Pierson Street, Lockleys is well serviced by existing infrastructure and services.

Whilst the Minister himself identified 25 Pierson Street, Lockleys as a “strategic infill site”, the land is not recognised as such in Figure 10 or 11 in the GARP Discussion Paper.

Accordingly, we respectfully request that 25 Pierson Street, Lockleys is recognised in the Greater Adelaide Region Plan as a “strategic infill site” to make it clear that the land is indeed a strategic infill site where future development could facilitate Missing Middle housing. Such would assist in the processing of the revised Code Amendment.

Thank you for your consideration of this matter.

Yours sincerely,

A solid black rectangular box used to redact the signature of Chris Vounasis.

Chris Vounasis
Managing Director

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Thursday, 21 September 2023 7:28 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper

Customer type: Member of the public

Given name: pravinsinh

Family name: raol

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: My address is [REDACTED] kudla. Here we don't go further for farming due to water crisis and high bill of tap water. I strongly believe that council need to give permission for subdivision this area in 1000sqm as soon as possible so the growth of council go on higher and get personal benefit too Thanks

Attachment 1: No file uploaded

Attachment 2: No file uploaded

Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

Sent to
proponent email: plansasubmissions@sa.gov.au

DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 4:00 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: Greater-Adelaide-Plan-Submission.pdf

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper

Customer type: Development Industry

Given name: Judith

Family name: Bujack

Organisation: Proactive Property

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Proactive Property would like to raise the issue of expansion in Strathalbyn. This would relate to future residential areas to the south and southwest of the town centre, and may require the township boundaries to be increased. The increasing population and future land releases for Strathalbyn will require more amenities to support this growth. Detailed needs analysis has already highlighted that the area will require an additional supermarket and retail premises to support the current and future growth of the community.

Attachment 1: Greater-Adelaide-Plan-Submission.pdf, type application/pdf, 3.6 MB

Attachment 2: No file uploaded

Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

Sent to
proponent plansasubmissions@sa.gov.au
email:



ProActive Property
Level 1 /252 Hindley Street
ADELAIDE SA 5000

Phone: (08) 8410-6681

6th November 2023

Attention: Growth Management Team, Planning and Land Use Services

Department for Trade and Investment

GPO Box 1815

Adelaide SA 5001

Dear Sir/Madam,

Greater Adelaide Regional Plan Submission – 34-52 Milnes Road, Strathalbyn

Proactive Property requests that the Greater Adelaide Regional Plan provide policy direction to expand Strathalbyn township boundaries to the south and to review the Employment Zone land at 34-52 Milnes Road to support supermarket retailing of a neighbourhood scale to meet current and future growth needs.

Over the past 20 years Proactive Property has developed a vast portfolio of high-quality projects across Australia.

In 2022 Proactive Property acquired the 7.82 hectare employment zoned former Strathalbyn Harness Racing site (here referred to as the site). The site is located at 34-52 Milnes Road, Strathalbyn. Refer attached locality map.

The site is strategically positioned in an established residential and employment area and has a substantial frontage of 320m to Milnes Road. The site 'as the crow flies' is 450m to a future Master Planned Township zoned area also located to the south of the township of Strathalbyn.

Milnes Road is gazetted as a Restricted Access Vehicle route for use by commercial vehicles up to 26.0 m in length (such as B-Doubles) and therefore provides excellent access.

Development of the former racetrack site has commenced and 3 of 7 development stages are underway. The site has the potential to reach the 'next level' of employment generation if supported by a full line supermarket that would deliver improved amenity and services.

The site's substantial land area and strategic positioning therefore presents a unique and rare opportunity for the future growth and prosperity of Strathalbyn.

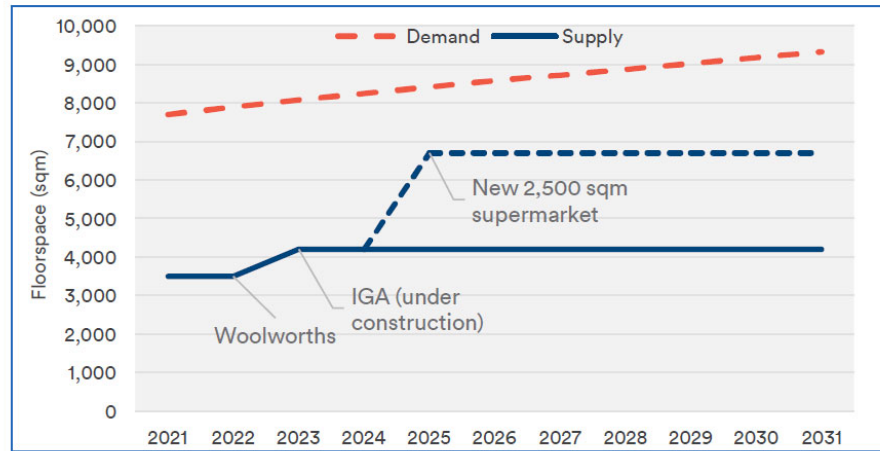
Strong interest is being received from major supermarket operators to establish a full line 2,500sqm supermarket on the site. The current Employment Zoning lists a shop greater than 1,000sqm in gross

leasable floor area as a restricted development and in the absence of guiding strategic policy is unlikely to provide a viable pathway to a planning approval for a full line supermarket.

A retail needs analysis undertaken by Deep End solutions for the Hampden Way Code Amendment demonstrates that even if the Hampden site is developed in 2025 there will continue to be a shortfall of retail floor space. Refer Figure 19 below.¹

Figure 19—
Supermarket
floorspace supply –
demand analysis

Source: Deep End
Services



Importantly the Proactive Property site provides an opportunity to accommodate a supermarket and associated specialty shops that would result in a footprint of only approximately 20% of the total site. A development site of this size will therefore not undermine the use of the balance of the land for other employment purposes. Refer site master plan attached.

A supermarket is likely to provide a boost and attract a mix of employment generating uses that is greater than a development scenario where there is no supermarket, or in a scenario where a supermarket is developed elsewhere south of the township.

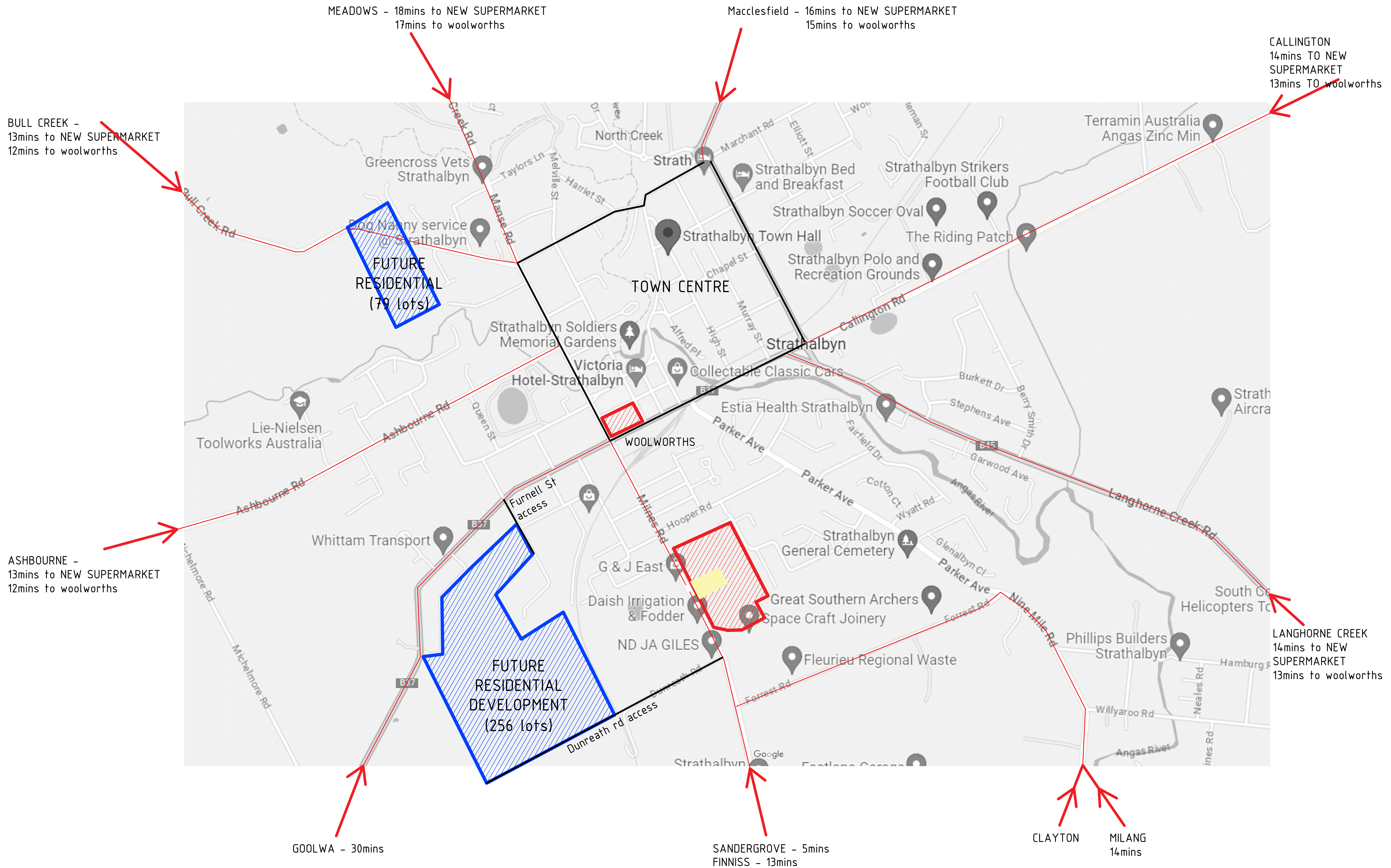
Should any of the above require clarification please do not hesitate to contact me on [REDACTED] or [REDACTED]

Yours sincerely

Richard Shoesmith

Owner and Managing Director

¹ Sourced from the PlanSA Website. Lot 5 Hampden Way, Strathalbyn Code Amendment Retail & Economic Investigations prepared for Strath Property Investments, 10 October 2022, Deep End Services.



DTI:PlanSA Submissions

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Monday, 6 November 2023 3:07 PM
To: DTI:PlanSA Submissions
Subject: Public Consultation submission for Greater Adelaide Regional Plan Discussion Paper
Attachments: GARP-Discussion-Paper-Submission-Evanston.pdf

Growth Management Team,

Submission Details

Amendment: Greater Adelaide Regional Plan Discussion Paper
Customer type: Other
Given name: Stephen
Family name: Holmes
Organisation: Holmes Dyer Pty Ltd
Email address: [REDACTED]
Phone number: [REDACTED]
Comments: See attached.
Attachment 1: GARP-Discussion-Paper-Submission-Evanston.pdf, type application/pdf, 1.4 MB
Attachment 2: No file uploaded
Attachment 3: No file uploaded
Attachment 4: No file uploaded
Attachment 5: No file uploaded
Sent to proponent email: plansasubmissions@sa.gov.au

6 November 2023

Reference: 0900

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001

Attention: Growth Management Team

By Email: plansasubmissions@sa.gov.au

Dear Growth Management Team,

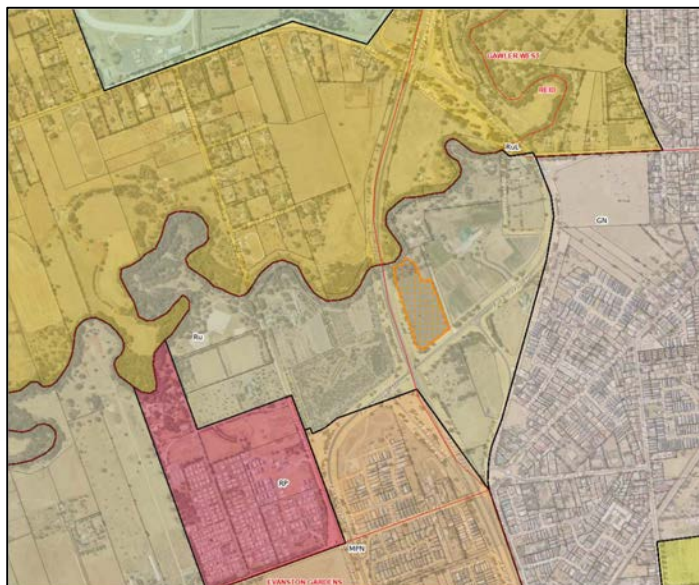
GREATER ADELAIDE REGIONAL PLAN SUBMISSION: 70A JACK COOPER DRIVE, EVANSTON

We provide this submission on behalf of our client Mr Rahee Arefeen, the owner of land at 70A Jack Cooper Drive, Evanston, in response to the Greater Adelaide Regional Plan (GARP) Discussion Paper currently on exhibition.

Mr Arefeen's land ('the subject site') is located to the south-west of the Gawler township and is zoned Rural. The locality consists of residential uses and the Gawler River to the north, agricultural uses to the east, Jack Cooper Drive and residential uses to the south, and the Gawler Bypass and agricultural uses to the west.

The site is identified in orange hatching below.

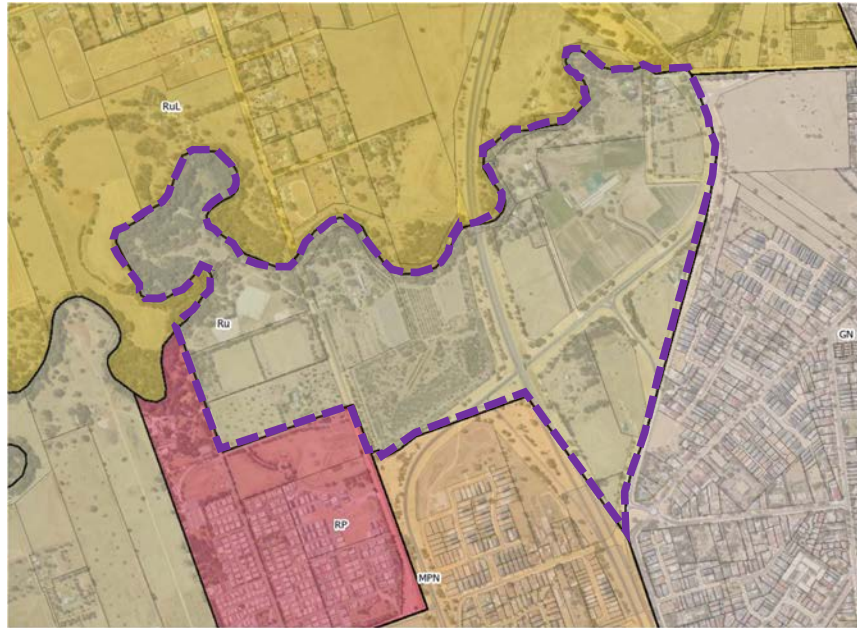
Figure 1. 70A Jack Cooper Drive, Evanston



The subject site is part of a larger area of rural land that over time has been alienated from surrounding primary production land. As shown in the image below, this area of rural land is now surrounded by land zoned General Neighbourhood to the east,

Master Planned Neighbourhood to the south, Residential Park to the south-west, and Rural Living to the north.

Figure 2. Wider Rural Area



This arrangement – while seeming to work currently – will inevitably result in pressure being placed on the owners of this rural land as surrounding urban development intensifies.

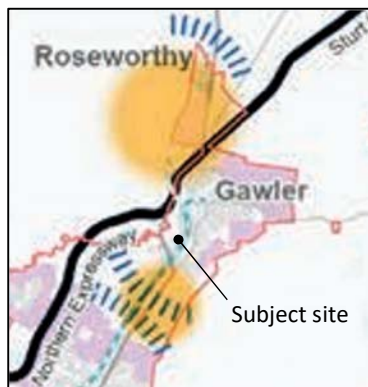
The supply of land currently available in Evanston within the Master Planned Neighbourhood Zone and General Neighbourhood Zone – both of which allow for allotments of 300 m²-500m² – is limited, while analysis of aerial imagery for the wider area indicates that the supply of land within the Rural Neighbourhood Zone (where the minimum lot size of 2,000m²) has been exhausted. Although much undeveloped land was identified for growth in Evanston Gardens and Evanston South, this is an entirely distinctive sub-market to the opportunity provided at Evanston.

Evanston Gardens and Evanston South are evolving as large scale 'tract' land developments of small lot sizes, whereas the subject locality has the potential to develop through more intimate land releases of distinctive character and a much wider range of allotment sizes.

Evanston is not mentioned in the GARP Discussion Paper, with *Figure 9 – Proposed Areas of Investigation* depicting two general Areas of Investigation near Roseworthy (Gawler Belt), and between the Gawler Township and Munno Para (situated across Kudla and Evanston South), as shown below. However, the Discussion Paper does identify that the subject land is in the urban precinct (as identified by the planned urban lands boundary and being outside the inter-urban break identified by the [redacted] lan).



Figure 3. Proposed Areas of Investigation (Source: GARP Discussion Paper)



Accordingly, this area warrants more detailed investigation of its suitability for urban development, particularly noting that:

- Analysis of flood inundation mapping from the 1:100-year ARI Flood obtained from WaterConnect, along with Flood Inundation Mapping undertaken by the Town of Gawler in 2018, indicates that only a portion of the site's northern boundary would be susceptible to flooding.
- The locality is part of the north-eastern spine which has been identified for further investigation for growth opportunities.
- Strong population growth, which has been exceeding both ABS and PLUS' high growth scenarios reinforces the need to provide for more development opportunities within the existing urban area of Adelaide.
- The subject site (and broader locality) is only 3km from the main Gawler Town Centre (Murray Street), is in close proximity to the Northern Expressway, is only 1.5km to the nearest railway station (on the electrified northern line) and is adjacent to recently developed residential precincts that are serviced by all required infrastructure services.

Clearly the locality has a number of advantages that render it suitable for further detailed investigation of its urban development potential.

It is our view that the site and surrounding rural land provides an opportunity for low to standard density residential development, which will provide a more appropriate interface with the existing residential land uses within the locality and a suitable transition to the semi-rural nature of Rural Living zoned land to the north.

It is therefore requested that our client's site and the surrounding rural land is considered for inclusion within the future Growth Investigation Area within the GARP currently identified over Evanston South and Kudla.

Yours sincerely

Stephen Holmes
Director

Submission for Greater Adelaide Regional Plan (GARP) review

Our submission focuses on the issue of boarding/rooming houses (also known as co-living accommodation) and the need for clearer policies in relation to this type of housing within South Australia's Planning & Design Code.

We write this submission as small local developers who are keen to build this type of accommodation for several reasons:

1. To play our part (albeit small) in helping to alleviate Adelaide's current housing crisis, by providing an accommodation option for people who are increasingly finding themselves with limited housing options they can afford
2. To be able to add this type of accommodation to our own investment portfolio
3. To be able to build this type of accommodation and provide these type of investment property options to both local and interstate property investors

We believe much more clearly defined and user friendly policies in this area would play a significant role in helping to address the State's housing needs in the coming 30 years.

This type of housing is desperately needed in Adelaide. Average household size is decreasing and single person households have increased 78% over the last 30 years, a trend likely to continue in the next 30 years.

With Adelaide's median house price having increased by something like 50% in the past three years, housing affordability is a massive issue. This is coupled with an unprecedented rental shortage throughout South Australia, with Adelaide having some of the lowest vacancy rates in the country. As at early November, the official rental vacancy rate sat at around 0.5% - 3% is considered to be a "balanced" rental market.

Homelessness is becoming an increasingly challenging social issue and many South Austrians are facing the prospect of not being able to find accommodation that suits their situation and that they can afford. Concerningly, women aged 55+ are Australia's fastest growing homeless cohort.

Boarding/rooming houses seems to be a completely overlooked housing type within the Planning & Design Code. Local planning consultants that we have spoken with on this type of development talk about it being "a tricky path to navigate".

Sadly, South Australia seems to have one of the least "user friendly" codes in allowing for the development of boarding/room house properties. Most other states seem to specifically recognise boarding/rooming house accommodation, and provide clear and explicit direction on how these are to be developed.

For example, Brisbane City Council has policies that allows for the creation of up to five studio or micro apartments within the one property, each comprising of a bedroom, lounge area, kitchenette and ensuite, often with a small courtyard. Common areas might include a larger kitchen, laundry or outdoor area. Tenants of these types of properties pay something like \$250-300 a week, an amount which is manageable for a large proportion of people.

Planning regulations in Victoria allow for up to nine people (“unrelated parties”) to share rooming house accommodation. In Western Australia it is six tenants.

We are not planners and are not equipped to go into the technical aspects of the South Australian Code and why it doesn’t easily facilitate this type of accommodation. Hopefully others with far more knowledge in this area will offer their views on boarding/rooming houses as part of the GARP review.

However, we felt compelled to write a submission to highlight our perspective as local property developers.

Investors are very keen to invest in these types of properties in South Australia. Rooming/boarding houses offer a much higher yield than a conventional home rented to a single family. For example, a typical 4 bedroom/2 bathroom house in the metropolitan area might rent for about \$600 a week. The same configuration offered as a boarding house could provide a return of something like \$1000-\$1200 a week.

We have a large network of property developer peers throughout Australia and are regularly asked if we can source land and build boarding/rooming house accommodation in metropolitan Adelaide which they can buy and rent out to local residents. Sadly, at this stage, we haven’t been able to provide them with a solution.

We hope that the GARP review seriously considers introducing policies that will bring South Australia in line with the rest of the country and provide a much needed housing option for local residents.

Karen Baldwin and Scott Ellis
Rainmaker Property Pty Ltd



DTI:PlanSA Submissions

From: Robot Bombardieri [REDACTED]
Sent: Wednesday, 16 August 2023 9:52 AM
To: DTI:PlanSA Submissions
Cc: 'Robot Bombardieri'
Subject: Submission - Greater Adelaide Regional Plan Discussion Paper

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED] [Learn why this is important](#)

Hi,
Thank you for all of the work to get to this point.
You wouldn't believe how long we in kudla have been trying to be heard equally and fairly for well over thirty years.
We are given such a runabout with each of the members of the Gawler council throughout these years. They have many, many and many submissions from most of the landholders who live in kudla, me included. There is no point in trying, to get any where no matter whether we have had, professional speakers or politicians been pointless.
With an older generation of landholders who are not able to provide adequate machinery or funds to confirm to the council regulations regarding the upkeep. Our land cannot sustain or is viable for making an income from as many who live near me, go to wages for a living, leaving property maintenance and building to deteriorate. An eyesore.
With the express way and electrification of the Gawler line and an railway station within our own area, why can't we be given the opportunity for subdivision.
Attending from one of the first public meetings that was held years ago, it was an overwhelming response to larger more greener development and land sizes were agreed to of up to 2500m2.
Of all the meetings that I have attended and been actively involved in, never have any landholders voted to have small land parcels like North or south in Munno Para West of 300m2.
I could go on and on for days, but like all of the other gathered occasions has anything changed over the past 30 plus year's.
Why is land planning going into areas such as Concordia and Roseworthy where crops are produced from our farmer's, just to mention two
This area of kudla provides a number of opportunities for new redevelopment and development within two types of transport infrastructures, road and rail, with close proximity to schools, shopping centres, main north road and transport services, keeping people employed and shopping locally.
Anyway you get the idea of what I have been involved with and hopefully this will be considered seriously for change in our local community.
I look forward to hearing back from you and hopefully will see how our area could provide a perfect place for new growth in our region and a local place for people to live together and enjoy.
Kind regards
Robert Bombardieri

DTI:PlanSA Submissions

From: Sarah Lowe [REDACTED]
Sent: Monday, 6 November 2023 12:41 PM
To: DTI:PlanSA Submissions
Cc: [REDACTED] Tony Mercorella; Grazio Maiorano; Adrian Tisato
Subject: GARP Discussion Paper Submission - Fairview Park
Attachments: 231106 Fairview Park Submission on GARP.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Good afternoon,

Please find attached a submission prepared on behalf of Mr. Salvatore (Sam) Mercorella.

Kind regards,

Sarah



Sarah Lowe
Consultant
[REDACTED]

27 Halifax Street
Enter via Symonds Pl
Adelaide SA 5000
08 8333 7999

Kaurna Country

My working hours are:
Monday to Friday 8.30am-5.00pm

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URPS

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Melbourne VIC 3000

03 8593 9650

urps.com.au

6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001
plansasubmissions@sa.gov.au

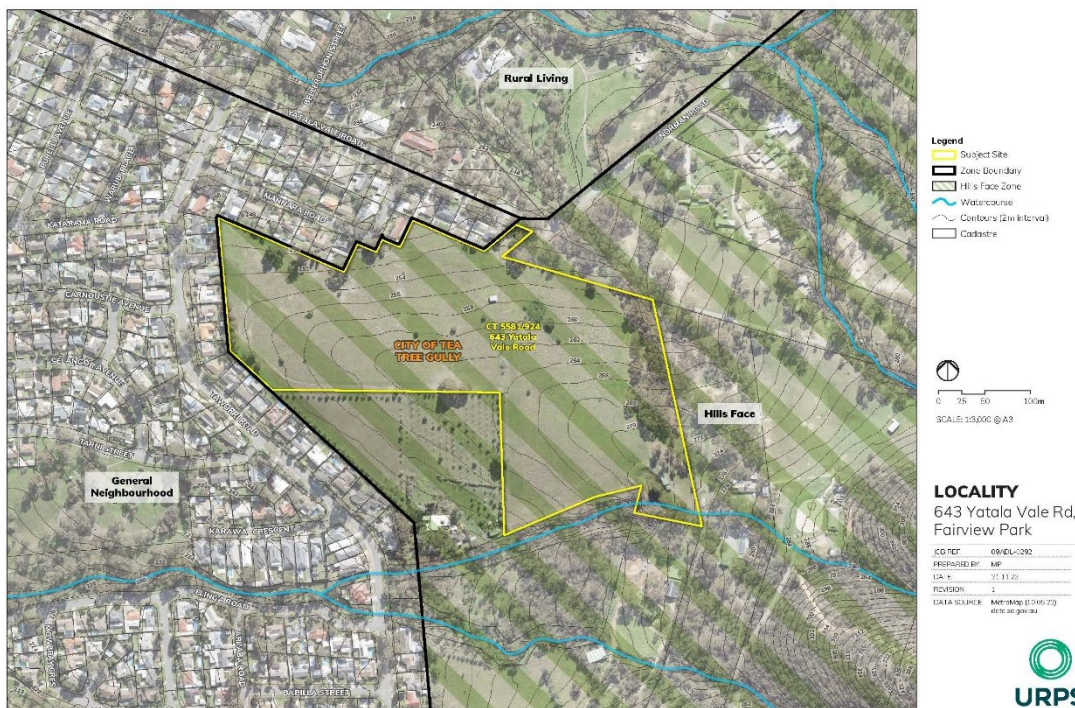
Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Fairview Parks Hills Face Zone

We act for Mr. Salvatore (Sam) Mercorella, the owner of 643 Yatala Vale Road, Fairview Park (Affected Area).

The Discussion Paper (Paper) currently on consultation seeks to stimulate debate on how the GARP will help deliver the 300,000 additional homes (and associated employment land) possibly needed over the next 30 years. We commend the State Planning Commission for preparing the Paper.

Affected Area

The Affected Area comprises one 10ha allotment as identified in CT 5581/924. It is located within the Hills Face Zone (HFZ) and the 'EFPA' but is contiguous to established residential areas within the General Neighbourhood Zone as shown below. Its inclusion in the HFZ (and associated EFPA) is and has always been anomalous and inappropriate.



Extracts from the GARP Discussion Paper

We agree with the Paper that areas with important character, heritage and environment attributes should be protected. We also acknowledge that development should not occur in high-risk areas that can be adversely impacted by flood or fire. Nor should development interfere with existing essential infrastructure.

The Paper notes that the Commission will not review the HFZ boundary, however it supports councils to investigate logical township inclusions through their own strategic planning work, particularly where there is existing service/infrastructure capacity.

The Affected Area has direct vehicle access from Yatala Vale Road, Mannara Road and Lamuli Street. Typical physical infrastructure can easily be provided to the site. The surrounding area is also well serviced by social and community infrastructure (refer to the attached social infrastructure map).

Requested Outcomes

We request the:

- GARP acknowledges that there are HFZ anomalies; and
- Commission details a process which identifies and addresses HFZ anomalies.

Justification

The Site is an Anomaly within the HFZ

The HFZ was established in 1967, when the site was used as a market garden.

Mr. Mercorella ceased the operation of the market garden in 1979 however, to avoid interface issues which arose from the encroachment of residential development to the north and west. In other words, the use of the land for rural purposes was adversely affected by the encroachment of sensitive uses.

Further, the Affected Area differs from many Hills Face Zone properties in that:

- It has been substantially cleared of native vegetation as a result of its market garden history.
- It is at the base of foothills, so it is not particularly prominent to the Adelaide Plains.
- It therefore makes a limited contribution to the 'natural character' of the Zone.
- It also offers no value for viable primary production.
- It has a modest slope, which could be easily developed (refer to image on page 1).

We have made several submissions to the State in recent years detailing that the site is an anomaly in the Hills Face Zone.

With no clear avenue for review, it is important that the GARP at least acknowledges that there are HFZ anomalies, with a process established to address these anomalies.

No Recent Reviews of the Hills Face Zone

The HFZ was last reviewed by the State Government in 2004.

The EFPA boundary was introduced in 2017. The EFPA prevents residential land divisions and applies to much of the HFZ. This legislated boundary adds another layer of complexity to any rezoning process.

The EFPA must be reviewed by the Commission at least every 5 years. Such a review process does not apply to the HFZ boundary, however despite the similar limitations it imposes on housing growth and land supply.

With no formal process for review, ad hoc approaches have been made seeking to change the HFZ boundary over the last 10-15 years. We understand these proposals have been unsuccessful.

This reiterates why a strategic, government-led review of the HFZ is important.

Need to Establish Criteria to Review the HFZ

URPS has developed draft criteria to help identify allotments which should not be in the HFZ. These criteria identify the Affected Area as one allotment (among others) that would warrant removal from the HFZ (and EFPA). These criteria capture allotments that:

- Have more than 30% of their perimeter adjoining residential zoned land.
- Have a land area between 1 and 20 hectares.
- Contain little or no native vegetation.
- Have a highest point less than 280m above Australian Height Datum (AHD).

In addition, we have developed additional principles that highlight the case for change, and which could be adopted by the State Planning Commission to assess HFZ amendments. We have compared these principles and the reasoning behind them with the Affected Area and highlighted why we believe a review and realignment of the boundary is warranted.



Principle	Reasoning	Comment in relation to Mercorella land
Connectivity	The land is connected to, and a logical extension of, the existing urban footprint.	The northern and western boundaries of the Affected Areas abut a well-established part of the General Neighbourhood Zone. The land can now be fully serviced by all required physical and social infrastructure. Three roadways connect into the land.
Serviceability	The site can be serviced without government contribution.	A significant factor in determining the original HFZ boundary was the inability to provide economical and orderly infrastructure (including SA Water services) beyond the proposed Hills Face. This is no longer a relevant factor as key infrastructure can now be provided to the site,
Visual backdrop	The site does not contribute to the landscape quality and views from the Plains to the western slopes of the South Mount Lofty Ranges.	The area has low levels of vegetation and offers little in the way of visual amenity. A Visual Impact Assessment Report prepared by WAX Design highlights that a significant portion of the site is not visible from the Adelaide Plains and that it does not fit well with many objectives of the HFZ.
Biodiversity and environmental values	The land does not have significant environmental assets that would be adversely affected and has been significantly modified.	<p>The land has very low levels of vegetation and development will not adversely impact on the environment. A more structured approach to vegetation could be taken through development.</p> <p>Since the surrounding area has become inundated with residential development Mr Mercorella has ceased undertaking market gardening on the site and it is now covered by low levels of vegetation.</p>
Natural Hazards	The land is not affected by <u>natural</u> hazards in a way that cannot be overcome through appropriate design solutions.	Appropriate planning and engineering (including water sensitive design techniques) would be the feature of any future development to ensure that the site is well managed and developed accordingly.

Principle	Reasoning	Comment in relation to Mercorella land
Public interest	A proposal is in the public interest e.g. required for public infrastructure, community service or other purpose that meets State or local objectives. Alternatively, there is a significant economic or social benefit that is consistent with State or local objectives.	The site is located in a desirable area in metropolitan Adelaide and offers a logical expansion of the residential area with little impact on the environment. The general area is well serviced by infrastructure and further allowances will be made on site to ensure community benefit, including the provision of affordable homes.
Heritage of cultural value	The land is not of Aboriginal or other heritage or cultural significance.	Further investigations can be undertaken but there are no immediate Aboriginal or cultural areas of significance identified on the site.

The Affected Area is one example of a site that clearly demonstrates the attributes of a site that ought not be within the HFZ / EFPA. It is a significant parcel of land that is inconsistent with the principles and objectives of the HFZ. Indicative yield work undertaken indicates that in order of 125 allotments could be provided on the Affected Area.

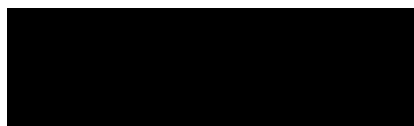
The objective of the future GARP is to ensure, in part, there is a strategy to tackle housing and living affordability, provide housing choice and ensure social equality. It therefore appears contradictory to not consider anomalies within the HFZ as part of these considerations.

Conclusion

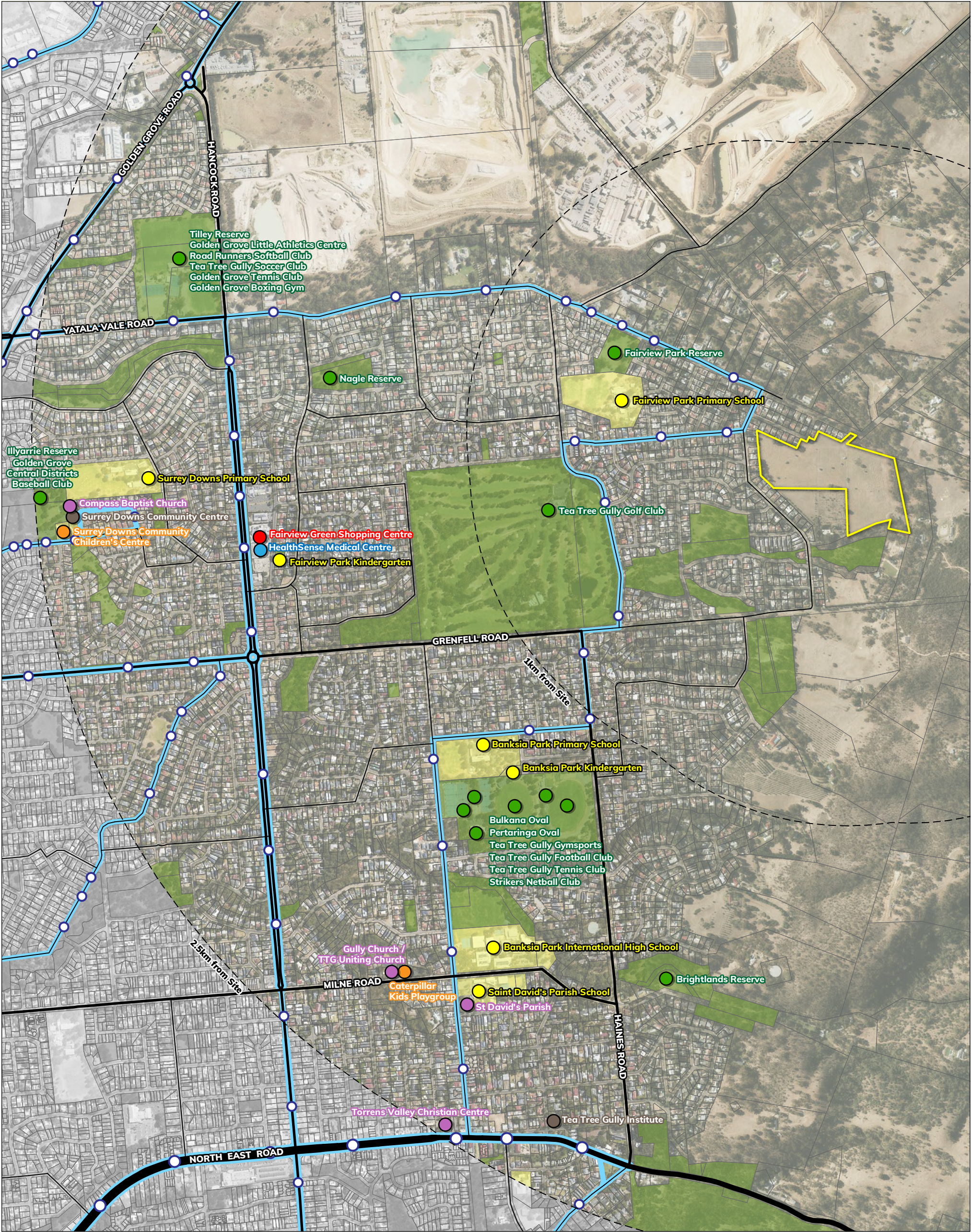
We respectfully encourage that the GARP acknowledges that there are HFZ anomalies; and for the Commission to detail a process which identifies and addresses such anomalies.

Please contact me on 8333 7999 if you have any questions.

Yours sincerely

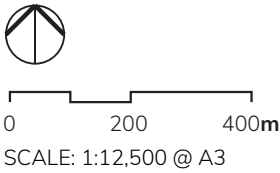


Sarah Lowe
Consultant














SOCIAL INFRASTRUCTURE 643 Yatala Vale Rd, Fairview Park

JOB REF.	09ADL-0292
PREPARED BY.	MP
DATE.	12.04.23
REVISION.	1
DATA SOURCE.	MetroMap (23.03.23) data.sa.gov.au



Legend

	Subject Site		Shopping Centre		Childcare
	Bus Route / Stop		Community Centre		Medical Centre
	Main Road Network		Recreation / Reserve		Place of Worship
	Cadastre		School / Kindergarten		



DTI:PlanSA Submissions

From: Dan Nguyen [REDACTED]
Sent: Monday, 6 November 2023 1:10 PM
To: DTI:PlanSA Submissions
Cc: Stewart White; Clem Salwin; David Brennan; Justin Krzywokulski; Lachlan Monfries; JANE KELLY [REDACTED] Jeff Armstrong
Subject: Subject: Submission – Greater Adelaide Regional Plan Discussion Paper - Scentre Group
Attachments: Scentre Group - Greater Adelaide Regional Plan Submission - Cover Letter.pdf; Scentre Group - Greater Adelaide Regional Plan Submission - Final - 6 November 2023.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Afternoon,

Please see attached cover letter and submission document for the Greater Adelaide Regional Plan Discussion Paper.

We look forward to being a part of the current discussion and ongoing engagement with the Growth Management Team, Planning and Land Use Services, to generate the best planning outcomes for the South Australian community.

If you have any comments or questions, feel free to contact me.

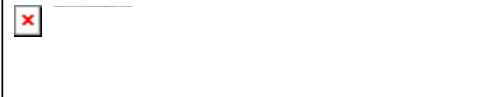
Thank you.

Kind regards,

Dan Nguyen

Development Executive

Development & Asset Management



W [scentregroup.com](https://www.scentregroup.com)

SCENTRE GROUP

6 November 2023

Attention:

Growth Management Team, Planning and
Land Use Services
Department for Trade and Investment
GPO Box 1815, Adelaide SA 5001
plansasubmissions@sa.gov.au

Dear Sir/Madam,

Greater Adelaide Regional Plan Discussion Paper | Scentre Group Submission

We are pleased to be able to have the opportunity to join the discussion on the future growth of Adelaide as part of the Greater Adelaide Regional Plan Discussion Paper process. Scentre Group operate 42 Westfield destinations across Australia valued at \$50.8 billion (learn more [here](#)). Notable assets include Westfield Marion, Westfield Tea Tree Plaza and Westfield West Lakes. These assets are highly valued social infrastructure and an integral part of the daily life of South Australians. As of December 2022, in aggregate the three centres generated \$1.8 billion of sales and attracted 28.5 million visitors annually.

This submission provides a strategic planning, economic and urban design review of three Westfield sites in South Australia and analyses best practice activity centre planning to ensure these important assets are maximised for community benefit over the coming 30 years. In conjunction with our consultants Urbis, we have identified key opportunities and noted recommendations for each of the respective centres (page 31).

We look forward to being a part of the current discussion and ongoing engagement with the Growth Management Team, Planning and Land Use Services, to generate the best planning outcomes for the South Australian community.

Please contact the undersigned if you require any additional information on [REDACTED]

Yours sincerely,

[REDACTED]

Daniel Nguyen
Development Executive

[REDACTED]



SCENTRE GROUP RESPONSE TO THE GREATER ADELAIDE REGIONAL PLAN – DISCUSSION PAPER

**An Advocacy Statement highlighting the
strategic opportunities presented by Scentre
Group's South Australian Portfolio**

Prepared for Scentre Group
November 2023

SCENTRE GROUP

This report is dated **November 2023** and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (Urbis) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of **Scentre Group** (Instructing Party) for the purpose of **providing a strategic positioning paper of their South Australian assets** (Purpose) and not for any other purpose or use. Urbis expressly disclaims any liability to the Instructing Party who relies or purports to rely on this report for any purpose other than the Purpose and to any party other than the Instructing Party who relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events including wars, civil unrest, economic disruption, financial market disruption, business cycles, industrial disputes, labour difficulties, political action and changes of government or law, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or made in relation to or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

Urbis has made all reasonable inquiries that it believes is necessary in preparing this report but it cannot be certain that all information material to the preparation of this report has been provided to it as there may be information that is not publicly available at the time of its inquiry.

In preparing this report, Urbis may rely on or refer to documents in a language other than English which Urbis will procure the translation of into English. Urbis is not responsible for the accuracy or completeness of such translations and to the extent that the inaccurate or incomplete translation of any document results in any statement or opinion made in this report being inaccurate or incomplete, Urbis expressly disclaims any liability for that inaccuracy or incompleteness.

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01

EXECUTIVE SUMMARY



ADELAIDE - ASPIRATIONAL GROWTH WILL REQUIRE A CHANGE IN THINKING

As outlined in the Greater Adelaide Regional Plan (GARP) discussion paper, Adelaide has set itself ambitions over coming years to create a stronger city economically, socially and environmentally. If Adelaide is to accommodate 600,000 additional residents and approximately 200,000 additional jobs by 2051, the city will require a step change in how it is planned.

Supporting the aspirational growth set out in the discussion paper will require overcoming the following challenges:

LOW POPULATION DENSITY



25% lower than MEL, SYD, BRI

AN OVER-RELIANCE ON THE CBD



19% of Jobs in the CBD (15% in MEL, SYD, BRI)

BRAIN DRAIN IN VALUE-ADD JOBS



Challenges in attracting and retaining white-collar jobs

AFFORDABLE HOUSING AND CHOICE AN ISSUE



Median house price up **71%** in a decade and low share of higher density housing

Activity Centres an Important Lever to Pull

Adelaide's activity centres will be key to alleviating each of the above issues. Their greater activation will further Adelaide's decentralisation and is in-line with South Australia's "Living Locally" objective to support well-located, well-designed 20-minute neighbourhoods that enhance access to housing and jobs and provide more vibrant community hubs.

Adelaide's activity centres are key to realising a range of benefits:

TRANSPORT CONNECTIVITY



Better utilisation of transport infrastructure

LIVING AND WORKING



Co-locating employment and housing

SUSTAINABLE COMMUNITIES



Walkable, with a focus on improved public realm

DENSITY AND AFFORDABILITY



Greater affordability and choice for households



SCENTRE GROUP'S ACTIVITY CENTRES WELL-PLACED FOR THE FUTURE

Of Adelaide's approximately 32 activity centres, Scentre Group's assets are among the best-positioned to significantly contribute to Adelaide's growth targets. Each are unified by the following principles that provide them with the foundations to become well-located, well-designed 20-minute neighbourhoods, in-line with the SA Government's Living Locally objective.



City Connectivity

All three sites are well-connected to Adelaide's transport infrastructure, including high-frequency train and O-Bahn bus networks and major arterial roads, providing good local and city-wide connectivity.



Main Landholder

Scentre Group's assets account for some of the largest land holdings within the activity centres across Adelaide. This provides the opportunity to deliver meaningful contributions, at scale and speed to support Adelaide's growth.



Strong Retail Cores

Scentre Group's shopping centres underpin Marion, Modbury and West Lakes activity centres as some of the highest-activity nodes in suburban Adelaide. These retail centres attract 28 million visits annually and provide the critical foundation to develop diverse and vibrant activity centres.



Large Resident and Worker Base

Marion, Modbury and West Lakes activity centres serve sizeable resident catchments and a large skilled workforce on their doorstep.



Westfield Marion



Westfield Tea Tree Plaza



Westfield West Lakes

HOW TO SUPPORT BEST PRACTICE ACTIVITY CENTRE PLANNING THROUGH PLANNING & DESIGN

KEY FINDINGS:

To deliver on the aspirations of the discussion paper in accommodating future growth and adopting the Commission's 'Living Locally' principles, our research has indicated:

- A flexible and facilitative planning framework is required for these major activity centre sites to encourage viable redevelopment and regeneration.
- Current height controls for each site are considered inconsistent with current growth objectives and population projections which seek to encourage higher density mixed-use development in strategic activity centre locations.
- Catchment areas surrounding each site will benefit from increased housing options and density to better utilise existing infrastructure and support the Commission's 'Living Locally' principles.
- Achievement of regenerative principles and design outcomes should be the aim of planning controls for these significant sites, rather than an approach dictated strictly by height controls.
- The significant scale and consolidated ownership of each site creates a unique opportunity in its management and master planning, ensuring a holistic design approach is adopted.

RECOMMENDATIONS FOR THE GARP:

General Recommendations

- R1** All three sites should be provided with consistent designation as the highest order regional activity centres in Greater Adelaide.
- R2** Greater flexibility should be provided in building height and density controls within the Urban Activity Centre Zone at each Scentre Group site.
- R3** The State's continued direction for the protection and hierarchy of established retail centres is supported. The GARP should not promote an increase in out of centre retailing.
- R4** The GARP should highlight the importance of continued public investment in infrastructure and public transport associated with each activity centre.

Westfield Marion Recommendations

- R5** The Commission's proposed Morphett Road urban corridor investigation area is supported. Consideration should be given to expansion around the perimeter of the Westfield Marion site.
- R6** The Commission's proposed centre and neighbourhood regeneration areas surrounding Westfield Marion are supported. Current catchment areas should be expanded to support greater housing choice near existing services.

Westfield Tea Tree Plaza Recommendations

- R7** The Commission's proposed centre and neighbourhood regeneration areas surrounding Westfield Tea Tree Plaza are supported. Current catchments should be expanded to support greater housing choice in these areas.

Westfield West Lakes Recommendations

- R8** Westfield West Lakes should be identified as a mass rapid transit investigation area consistent with the current 30-Year Plan and ITLUP.
- R9** The Westfield West Lakes activity centre and surrounding catchment areas should be identified as an activity centre and neighbourhood regeneration area to support greater housing choice near existing services.

An aerial night photograph of a city intersection. In the foreground, a wide, paved plaza with a grid of young trees and modern streetlights leads to a large, historic building with a blue roof. To the right, a tall, modern skyscraper with many lit windows stands prominently. Further right, a large, ornate church with a tall spire is illuminated. The background shows more city buildings and distant hills under a dark blue sky. Light trails from cars are visible on the roads.

02

INTRODUCTION

INTRODUCTION

SUBMISSION OVERVIEW

Urbis Pty Ltd has been engaged by Scentre Group to undertake a strategic review of three major activity centre sites in metropolitan Adelaide, including Westfield Marion, Westfield Tea Tree Plaza, and Westfield West Lakes, and prepare a submission in response to the Greater Adelaide Regional Plan (GARP) discussion paper.

SCENTRE GROUP

Scentre Group operate Westfield destinations that are highly valued social infrastructure assets and an integral part of the daily life of South Australians.

Scentre Group are constantly evolving to meet the future needs of customers, and are committed to growing in a responsible, sustainable way, including a commitment to net zero emissions by 2030.

This submission provides a strategic planning, economic and urban design review of three Westfield sites in South Australia, and analyses best practice activity centre planning to ensure these important assets are maximised for community benefit over the coming 30 years.

WESTFIELD MARION

Westfield Marion is the largest shopping centre in South Australia. Located 15 kilometres south of the Adelaide CBD, the centre can be accessed conveniently from the city by Anzac Highway and Morphett Road. The centre caters to a total accessible market of 660,000 residents.

Westfield Marion Overview

Site Area	22.9 ha
Centre Opened	1968
Centre Redeveloped	1982, 1989, 1997
Business Partners	310
Gross lettable area	137,141m ²
Car Parking Spaces	5,549

WESTFIELD TEA TREE PLAZA

Westfield Tea Tree Plaza is located in Adelaide's north-east suburbs approximately 15 kilometres from the CBD. The centre currently caters an accessible market of 640,000 residents.

Westfield Tea Tree Plaza Overview

Site Area	21.7 ha
Centre Opened	1970
Centre Redeveloped	1991, 2004, 2018
Business Partners	249
Gross lettable area	99,524m ²
Car Parking Spaces	4,650

WESTFIELD WEST LAKES

Westfield West Lakes is located 12 kilometres north-west of the Adelaide CBD and currently caters to an accessible market of 590,000 residents.

Westfield West Lakes Overview

Site Area	20.4 ha
Centre Opened	1974
Centre Redeveloped	2004, 2013
Business Partners	229
Gross lettable area	70,912m ²
Car Parking Spaces	3,909

GARP DISCUSSION PAPER

The State Planning Commission estimate that by 2051, Greater Adelaide is expected to grow by approximately 46% or 670,000 people from today's population, requiring an additional 300,000 new homes.

This growth will need to be delivered by a combination of methods including strategic infill, whilst achieving the Commission's principles of 'Living Locally' by locating housing, jobs and services closer together.

The GARP discussion paper identifies four main things relating to the Westfield sites:



All three sites have been identified as '**Major Activity Centres**'



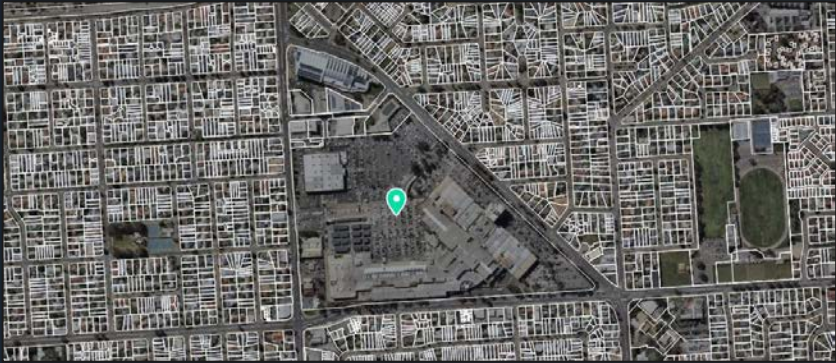
'**Neighbourhood and Centre Regeneration investigation areas**' have been proposed around the Westfield Tea Tree Plaza and Westfield Marion sites



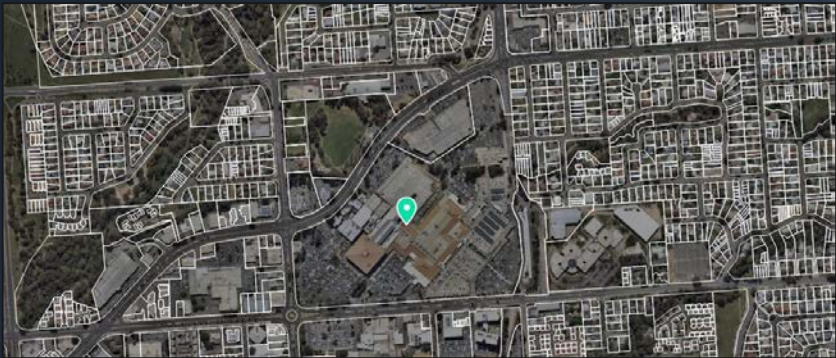
Westfield Tea Tree Plaza and Westfield Marion are noted as being connected by '**Existing Mass Transit**'



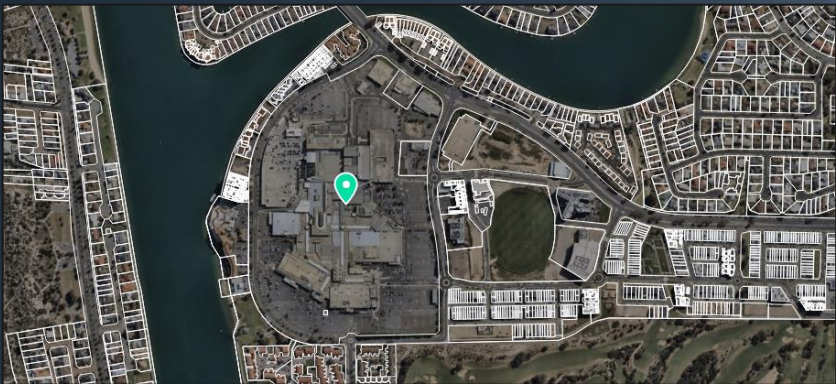
Morphett Road (along the western frontage of the Westfield Marion site) has been identified as a '**Corridor Investigation Area**'



Site 1: Westfield Marion (297 Diagonal Road, Oaklands Park)



Site 2: Westfield Tea Tree Plaza (972 North East Road, Modbury)



Site 3: Westfield West Lakes (111 West Lakes Boulevard, West Lakes)

03

STRATEGIC CONTEXT & THE EVOLUTION OF ADELAIDE



ADELAIDE – WHERE HAS IT COME FROM?

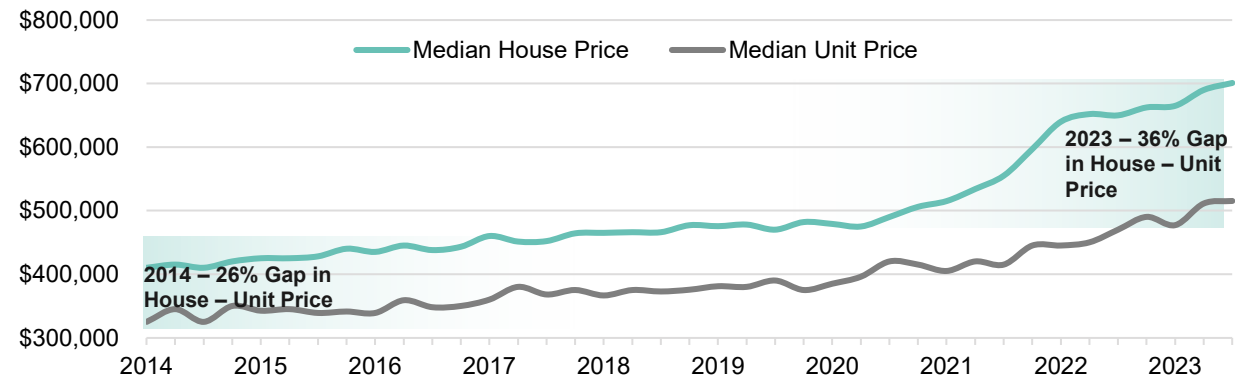
Adelaide is Australia's fifth-largest metropolitan area, a city of almost 1.5 million people. While it contributes significantly to Australia's economy, its growth has lagged in recent decades.

Since 2002, Adelaide has experienced the lowest population growth of all state capital cities. Over this period its population has grown by 23%, compared to an average growth of 40% of all other state and territory capitals.

Even with lower-than-average growth, the city is struggling to build sufficient housing for its population, with housing affordability becoming of increased concern. Over the last decade there has been an increasingly large gap between the median house and unit price. Since 2014, the house – unit price gap has increased by ten percentage points.

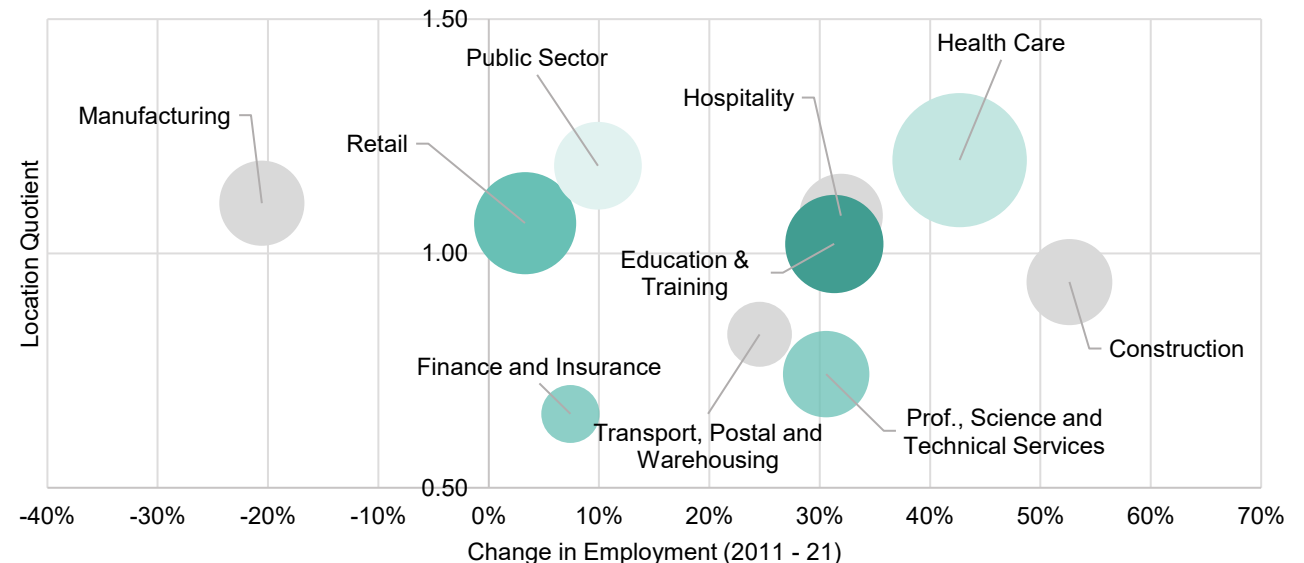
Similarly, Adelaide is less effective than the other major capital cities in retaining and attracting the kind of jobs and workers that drive growth. High value-add industries such as Finance and Professional, Scientific & Technical Services account for a lower-than-average contribution to Adelaide's employment market. In their place, the city has higher-than-average shares of population-based jobs such as hospitality, retail, public sector employment and health care, industries that don't drive economic growth to the same degree.

Adelaide's Housing Becoming Increasingly Unaffordable



Source: PriceFinder; Urbis

Adelaide's Industry Strengths not Driving Growth



Note: Location Quotient is a ratio that measures a region's industrial specialisation relative to a benchmark. In this case, Greater Adelaide has been benchmarked against Australia's Greater Capital City Areas. Size of each bubble is number of jobs by each industry in Greater Adelaide. Source: ABS; Urbis

WHAT IS ADELAIDE'S STRATEGIC PLANNING CONTEXT?

STATE PLANNING POLICIES

SA's State Planning Policies set out the following key policy targets regarding activity centres:

SPP 1: Integrated Planning:

- **P1.3:** Plan growth in areas of the state that are connected to and integrated with, existing and proposed public transport routes, infrastructure services and employment lands.
- **P1.7:** Regenerate neighbourhoods to improve the quality and diversity of housing in appropriate locations supported by infrastructure, services and facilities.
- **P1.8:** Mixed-use development around activity centres, public transport nodes and strategic transit corridors to encourage greater use of active transport options such as walking, cycling and public transport.

SPP 6: Housing Supply and Diversity:

- **P6.5:** Locate higher density residential and mixed-use development in strategic centres and transport corridor catchments to achieve the densities required to support the economic viability of these locations and the public transport services.

SPP 9: Employment Lands:

- **P9.7:** Encourage appropriate retail development through the implementation of best practice retail planning guidelines.

SPP 11: Strategic Transport Infrastructure:

- **P11.11:** Encourage housing in metropolitan Adelaide in proximity to current and proposed fixed line (rail, tram, O-Bahn and high frequency bus routes).

CURRENT 30-YEAR PLAN POLICIES

- The current 30-Year Plan (2017 update) identifies the three Westfield sites as **higher order regional activity centres** (Marion and Tea Tree Plaza) and **district activity centre** (West Lakes).
- The Plan also identifies the Modbury interchange and Oaklands Railway Station as **mass transit stations**, with potential future fixed line transit (train/tram) leading to the West Lakes site.

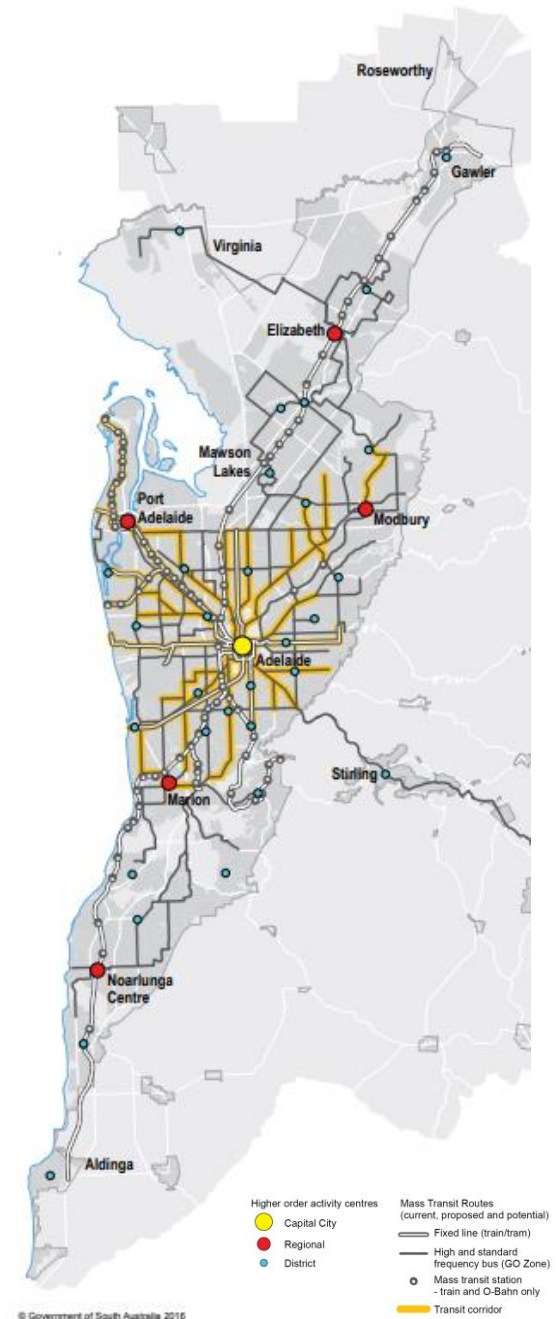
Key policies of the Plan relating to activity centres include:

Transit Corridors, Growth Areas and Activity Centres

- P2:** Increase residential and mixed-use development in the walking catchment of:
 - Strategic activity centres
 - Appropriate transit corridors
 - Strategic railway stations.
- P3:** Increase average gross densities of development within activity centres and transit corridor catchments from 15 to 25 dwellings per hectare to 35 dwellings per hectare.
- P5:** Encourage medium rise development along key transport corridors, within activity centres and in urban renewal areas that support public transport use.
- P9:** Develop activity centres as vibrant places by focusing on mixed-use activity, main streets and public realm improvements.

INTEGRATED TRANSPORT & LAND USE PLAN (ITLUP)

- The ITLUP (2015) identifies that a new tram service (PortLINK) will service redeveloped areas of West Lakes along with Outer Harbor, Grange and Semaphore.



HOW IS THE STATE'S STRATEGY INFLUENCING WHERE HOUSING IS BUILT?

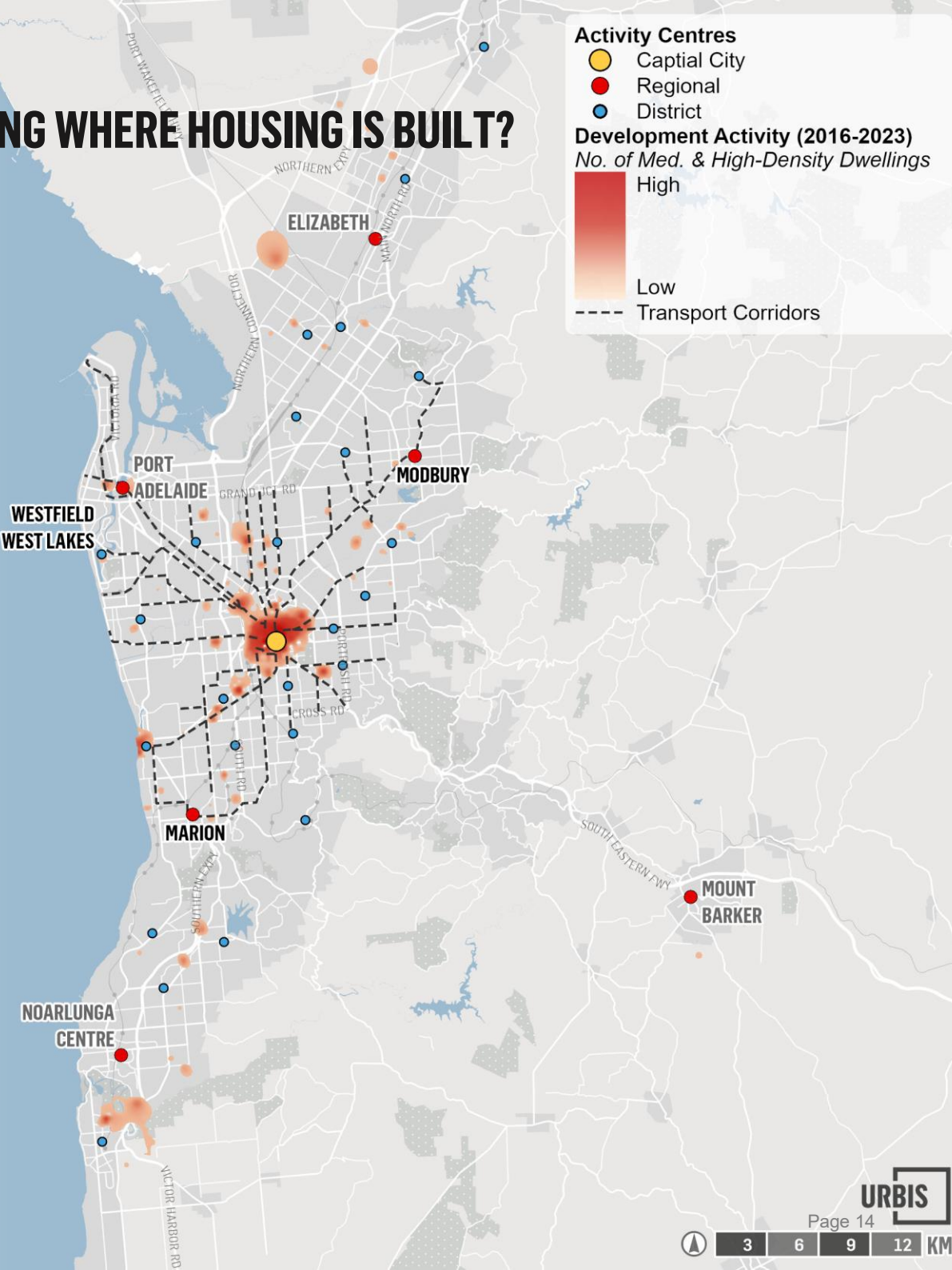
Over the last decade Adelaide has approved around 100,000 new dwellings. Of these, fewer than a third were approvals for medium or high-density dwellings.

The higher density residential development over the past seven years has been largely concentrated in a select number of locations, the inner areas of Adelaide, key corridors and strategic infill sites.

With Adelaide forecast to require an additional 300,000 dwellings over the next three decades, a broader intensification of residential development will be required.

Adelaide's activity centres are well placed to support a greater share of population growth over coming years.

As Adelaide continues to grow, a greater dispersion of density will also reduce the city's reliance on its CBD, which will deliver greater economic, social and environmental benefits for the city.



WHAT CHALLENGES WILL ADELAIDE FACE OVER COMING YEARS?

A GROWING POPULATION



+600,000

ADDITIONAL PEOPLE

By 2051

AN OVER-RELIANCE ON THE CBD



19%

OF ADELAIDE'S JOBS IN THE CBD

Compared with 10%-15% across Melbourne, Sydney and Brisbane

TOURISM RETURNING WITH STRENGTH



+25%

INCREASE IN VISITATION

Forecast by 2027

INCREASED DENSITY REQUIRED



353

PEOPLE PER KM²

Compared with 504 people per km² in Melbourne

A GROWING WORKFORCE, DIVERSITY NEEDED



+185,000

ADDITIONAL JOBS

2023 - 2043

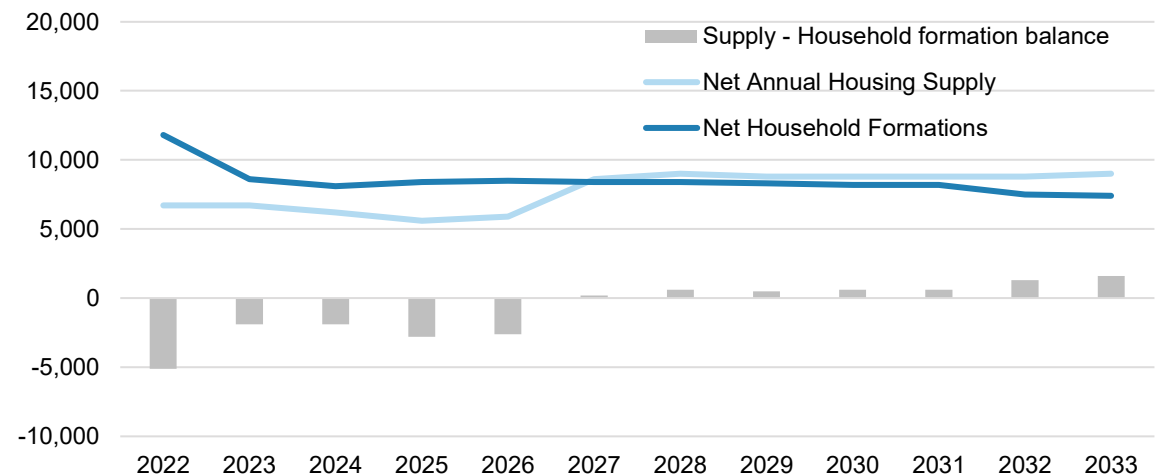
The discussion paper and current 30-Year Plan set out the city's framework for growth, with objectives to become more liveable, competitive and sustainable. In achieving these objectives, the city must face challenges that are currently limiting its growth.

With Adelaide targeting to add 600,000 new residents over the next three decades it will require opportunities for higher density residential development across the centre, with a focus in the already established activity centres.

Significant work will also be required on the employment-front. Around 185,000 additional jobs will be required over the coming two decades, yet Adelaide is overly reliant on its CBD as an employment centre.

Around 20% of the city's jobs, and 40% of white-collar jobs are based in Adelaide's CBD, a significantly greater employment intensity than, for example, Melbourne (10% and 26%) and Sydney (15% and 34%). To achieve both population and employment objectives, Adelaide's non-CBD activity centres will need to play a greater role over coming years.

A 9,000-dwelling shortfall in Adelaide over the next decade



Source: Housing Australia – State of the Nation's Housing Report – 2022 - 2023; Urbis



04

BEST PRACTICE ACTIVITY CENTRE PLANNING

BEST PRACTICE RETAIL PLANNING

South Australia features an established centres policy in relation to retail development.

As set out in the Commission's Productive Economy Discussion Paper (2018), planning policy has emphasised retail in activity centres through establishing a hierarchy based on the population each centre is expected to serve. This has been combined with land use policies that curtail out-of-centre retail development.

This is further supported by State Planning Policy 9.7 – Employment Lands, which seeks to protect higher-order centres that support a productive settlement pattern, while allowing for smaller-scale activity centres to emerge.

BEST PRACTICE PRINCIPLES – RETAIL PLANNING (SPP 9.7)



Existing centres

Recognise existing activity centres, main streets and mixed-use areas as the primary place for commercial and retail activity.



Expansion

Allow for expansion of designated centres at 'edge-of-centre' locations



New activity centres

Allow new activity centres to be established to support equitable and convenient access to services, while supporting productive settlement patterns.



Hierarchy

Protect higher-order centres that support a productive settlement pattern, while allowing for smaller-scale activity centres to emerge and diversify.



Urban design

Reinforce the role of land use policies to guide urban form and place-making in mixed-use activity centres.



WHAT PRINCIPLES UNDERPIN SUCCESSFUL ACTIVITY CENTRES?

High-performing activity centres are underpinned by a series of uniting principles. Those that achieve these principles are thriving places to visit, work and live. They promote sustainability and are activated both day and night through by incorporating a well-considered mix of uses.



A Strong Retail Core

A prominent retail precinct/centre is the heart of a vibrant activity centre, driving visitation and economic activation and provides the core amenities and services for mixed use development.



Active Spaces

An intensified, co-located mix of commercial and non-commercial uses creates vibrant, healthy mixed-use centres. Increasingly, well-designed activity centres merge a diverse range of commercial offerings, housing and accessible open spaces.



Living and Working

A well-balanced mix of residential and commercial uses creates a dynamic environment where people can work, live and socialise, creating a sustainable and lively community, while also providing a nearby workforce for businesses to tap into.



Community Facilities

Accessible community facilities, such as schools, healthcare centres and gathering spaces strengthen social connection, attracting and retaining residents and visitors alike.

NOT ALL ACTIVITY CENTRES ARE EQUALLY PREPARED TO SUPPORT ADELAIDE'S GROWTH

Adelaide's 32 activity centres each demonstrate a varying ability to support Adelaide's future growth. Some are limited in size, are on the outer fringes of the urban area or have large numbers of stakeholders whose interests need to be navigated to deliver on the Government's growth aspirations. Below is a summary of the attributes that would facilitate achieving the desired outcomes in Adelaide's activity centres.



CONCENTRATED VS FRAGMENTED OWNERSHIP

Many activity centres in Adelaide, particularly larger Regional Centres are comprised of many landowners with competing priorities and interests. Opportunities will be easier to unlock among a small number of stakeholders with significant interests in an activity centre.



SUPPORTING DENSITY WITH PUBLIC TRANSPORT CONNECTIVITY

Having nearby access to public transport avoids overloading local road networks by reducing reliance on cars. With co-located amenity, employment and residential uses, it also supports a well-connected and vibrant 20-minute neighborhood.



ACCESS TO JOBS AND A WORKFORCE

Attracting businesses to an activity centre is underpinned by access to a local resident workforce. In line with Adelaide's living locally strategy, selecting activity centres with a high number of jobs locally will be key to attracting residents seeking to live near where they work.



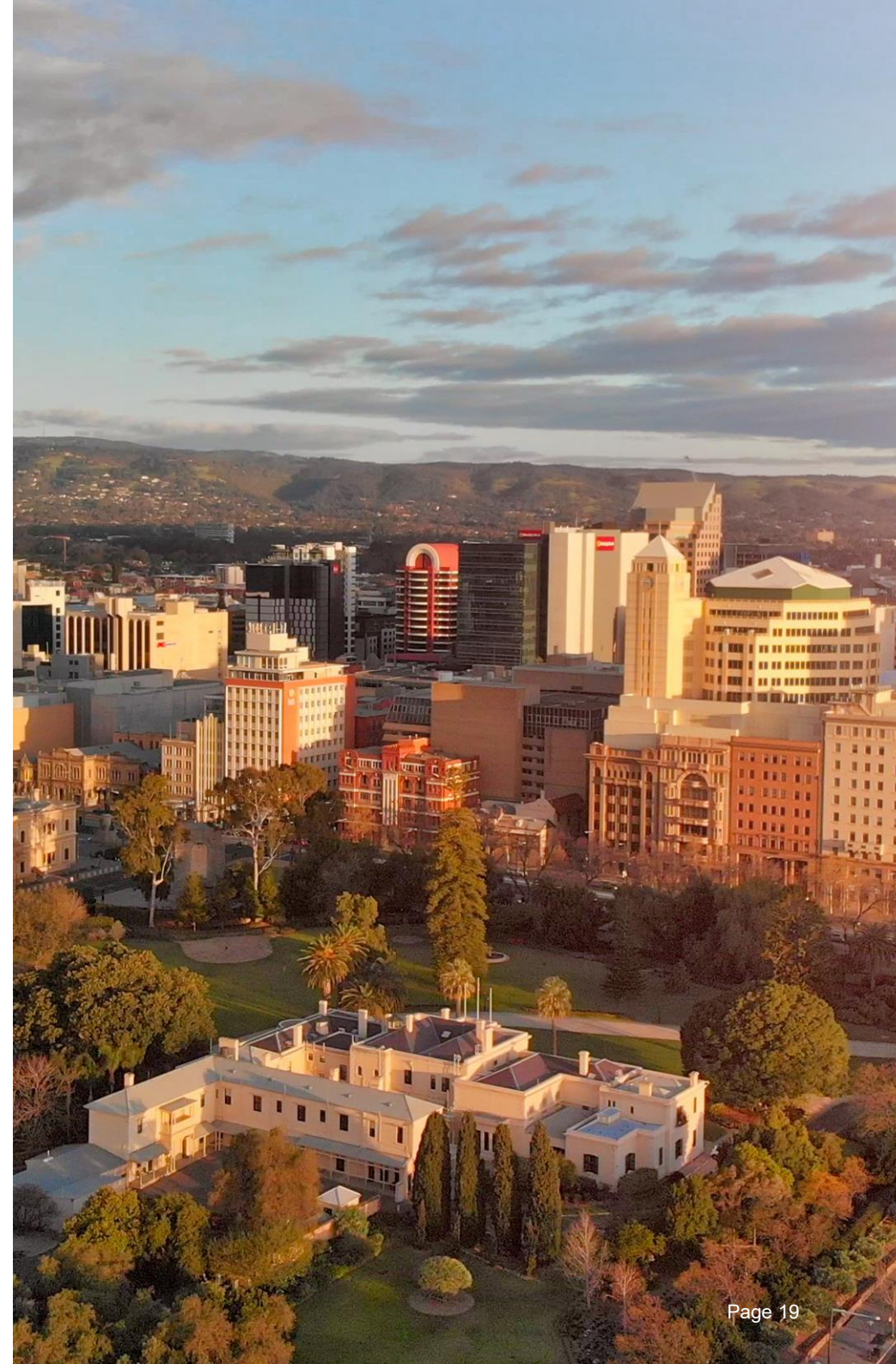
FINDING A HAPPY MEDIUM BETWEEN CBD AND THE SUBURBS

Adelaide is a CBD-centric city, with its employment markets largely concentrated in the city. While an effort should be made to diversify and decentralise, a relative proximity of activity centres to Adelaide's employment and entertainment centre would support demand from businesses and residents alike.



ACCESS TO AMENITIES AND SERVICES

Activity centres with the best range of amenities and services and high-quality public realm will be prioritised by residents as a place to live and employers establishing new offices.



WHICH OF ADELAIDE'S ACTIVITY CENTRES ARE BEST-POSITIONED TO SUPPORT GROWTH?

Greater Adelaide is serviced by 32 activity centres. These centres are designated across three classifications, in order of their size and regional significance. Scentre Group's assets are among the most prominent, with two classified as Regional Activity Centres, and West Lakes one of the larger District Activity Centres.

The activity centres that Scentre Group's assets are located in are strongly positioned to support Adelaide's future growth:

- Each are located in the inner to middle suburbs of Adelaide and are underpinned by a **prominent retail core** that will support the addition of a diversified commercial offering, as well as servicing increased residential density in their surrounds.
- Modbury (Tea Tree Plaza), Marion and West Lakes all have a significant **resident base and employment opportunities** in their immediate surrounds, making them an attractive place to live for prospective residents and businesses to establish new workplaces for their employees.
- Additionally, Scentre Group's sizeable properties provide their respective activity centres with a **significant land-owner**, whereas most other Activity Centres have fragmented ownership, limiting the scale of development potential and timing in delivering improvements.

Adelaide's Regional and Major District Activity Centres

		Km from CBD	Size (ha.)	Retail GLA ('000s sq.m)	Titles per ha.	Main Title - % of AC	Residents within 1km	Jobs within 1km	Workforce within 20-min drive	% of white-collar jobs
CBD	Adelaide	-	265	350	18.9	1%	20,400	95,700	352,000	52%
Regional Activity Centre	Marion	11	25	110	1.0	94%	14,500	6,400	241,000	13%
	Modbury (Tea Tree Plaza)	13	91	115	2.8	30%	9,900	7,300	250,000	24%
	Elizabeth	23	68	70	1.6	38%	4,500	4,900	167,000	15%
	Mount Barker	28	16	25	9.0	28%	5,200	2,300	44,000	16%
	Noarlunga	25	99	65	0.5	17%	7,800	5,300	141,000	27%
	Port Adelaide	12	247	45	8.4	4%	5,900	5,900	238,000	22%
District Activity Centre	West Lakes	11	34	70	3.2	75%	7,000	2,900	167,000	14%
	The Grove Shopping Centre	17	22	35	0.7	62%	6,900	2,100	229,000	11%
	Munno Para Shopping City	27	32	55	0.8	49%	11,100	2,300	141,000	7%
	Hollywood Plaza	18	21	35	3.3	34%	12,900	2,000	245,000	19%
	Ingle Farm	12	41	30	1.2	25%	10,900	2,200	308,000	11%
	Salisbury Town Centre	18	73	40	4.9	10%	10,300	3,900	246,000	19%
	Bayside Village (Glenelg)	9	15	15	18.1	6%	12,500	4,600	267,000	18%
	Others	13	11	14	5.0	33%	12,100	3,000	243,000	19%

05

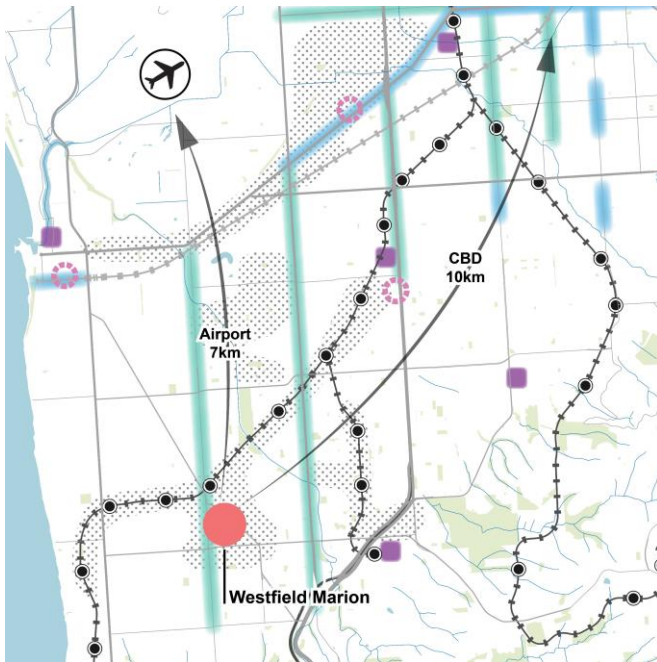
DELIVERING SUCCESSFUL ACTIVITY CENTRES AT SCENTRE GROUP'S SITES



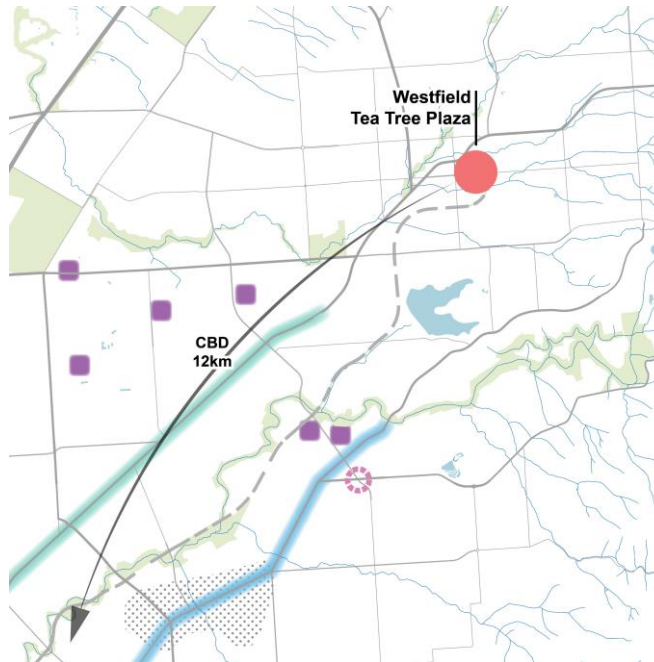
STRATEGIC ADVANTAGE

Scentre group's three activity centres at Marion, West Lakes and Tea Tree Plaza are strategically located to deliver:

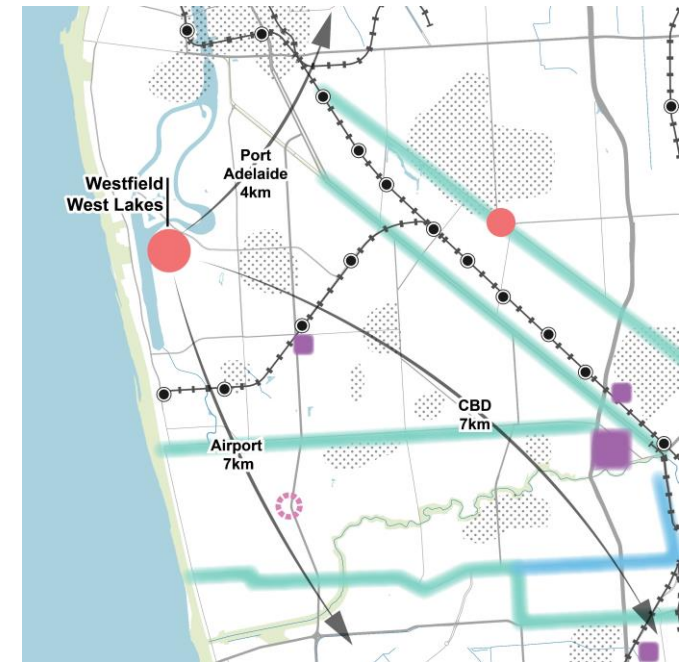
- highly connected places with employment, services and housing focussed around public transport interchanges and high-frequency public transport
- the living locally principles of walkable, greener, equitable places that support housing diversity and affordability while capitalising on existing mixed-use opportunities
- substantial housing and employment land supply in highly accessible locations on large sites with limited constraints to development intensity
- catalytic sites that will drive the Vision of the Greater Adelaide Regional Plan



Westfield Marion



Westfield Tea Tree Plaza



Westfield West Lakes

Legend

- | | | |
|---|---|---|
| ● Major Activity Centre | --- O-Bahn | — Main road |
| ⊙ Activity Centres | ⊙ Mass transit and station | ■ Open space |
| ▬ Existing Corridor Zone | ⊢⊢⊢ Tram line | |
| ▬ Corridor Investigation Area | — Highway | |
| ■ Strategic infill areas | — Arterial road | |
| ⋯ Neighbourhood and centre regeneration | | |

WESTFIELD MARION – PLANNING CONTROLS OVERVIEW

Key Planning Controls

Urban Activity Centre Zone

- The zone primarily seeks shops, offices, entertainment, health, education and recreation related uses and other businesses.
- Medium-to-high density residential development generally up to 6 building levels is permitted above non-residential uses.

Surrounding Catchment:

- The Urban Renewal Neighbourhood Zone and Housing Diversity Neighbourhood Zone permit predominantly medium density residential development generally up to 3 building levels.
- The Community Facilities Zone provides community uses (non-residential).
- The General Neighbourhood Zone permits predominantly low-density, low-rise housing within the wider area.

Zone	Desired Maximum Building Height	Desired Density
UAC	medium-rise development (3-6 building levels)	medium-to-high densities (35 to >70 du/ha)
URN	3 building levels and 12.5 metres	predominantly medium density (35 to 70 du/ha)
HDN	3 building levels and 12 metres	predominantly medium density (35 to 70 du/ha)
GN	low rise (2 building levels)	primarily low with some medium density

Key Observations

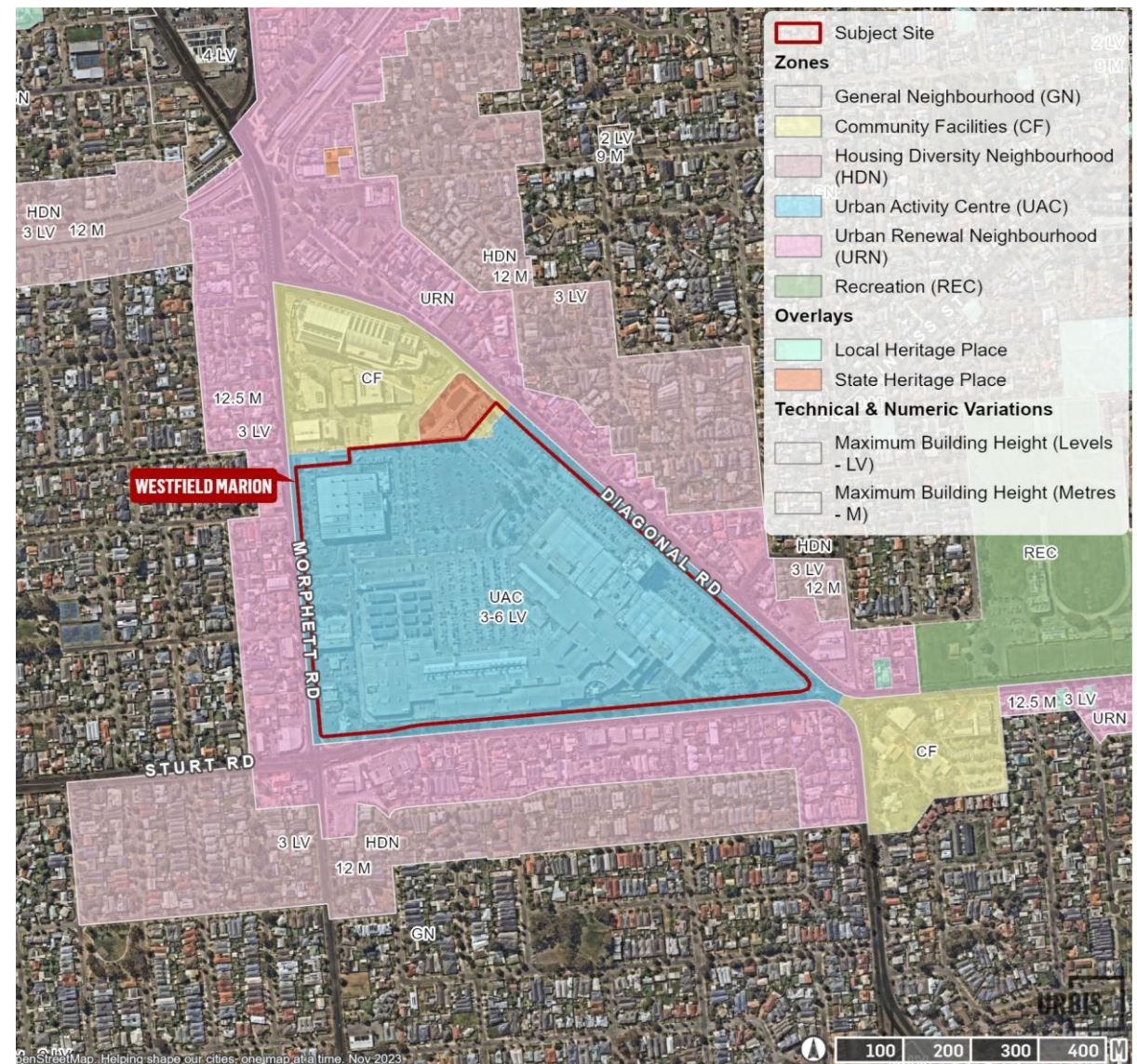
The site is considered a 'strategic activity centre' due to its proximity to existing rapid transit (Oaklands railway station and Marion interchange).

Current strategic policy seeks to increase density within catchment areas of strategic centres (400m of high frequency bus stops and 800m of fixed line transit stations) to the medium to high density range.

Limited areas of heritage and character are evident within the wider locality.

Limited interface issues are evident with community facilities to the north and south-east of site.









Spatial Mapping









WESTFIELD MARION – DEVELOPMENT OPPORTUNITIES

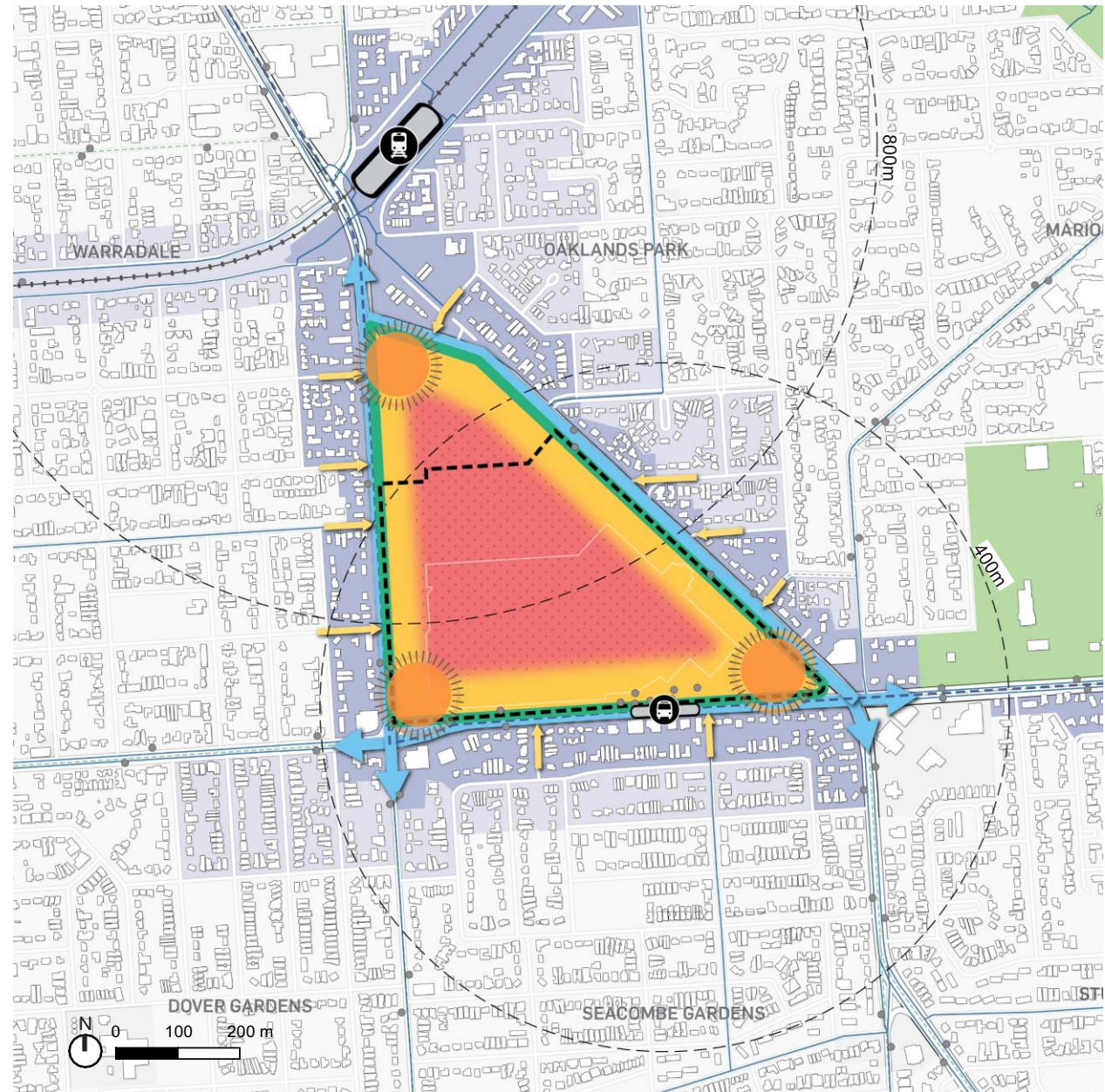
To deliver on the ambitions of the discussion paper and embed the principles of living local, our urban design analysis has indicated:

- There are no direct sensitive interfaces with the centre edge by broad street cross sections with limited established streetscape character.
- The size of the landholding creates the opportunity to place substantial height within the urban core of the site while transitioning scale towards the edges.
- Urban intensification of the centre will likely act as a catalyst for increased regeneration in the adjacent residential hinterland to a medium to high-density housing product.

-  Urban core with greatest opportunity for heights and density
-  High density development framing the street and transitioning from the urban cor
-  Taller gateway-built form at corners
-  Opportunities to connect the centre back to the urban grid
-  Future high-density housing
-  Future medium density housing
-  Enhanced streetscape and urban greening
-  Human scale street wall at street edge

EGEND

-  Site boundary
-  Train line and station
-  Bus route and stops
-  High frequency bus
-  Bicycle network
-  Open space



WESTFIELD TEA TREE PLAZA – PLANNING CONTROLS OVERVIEW

Key Planning Controls

Urban Activity Centre Zone

- The zone primarily seeks shops, offices, entertainment, health, education and recreation related uses and other businesses.
- Medium-to-high density residential development generally up to 5 building levels is permitted above non-residential uses.

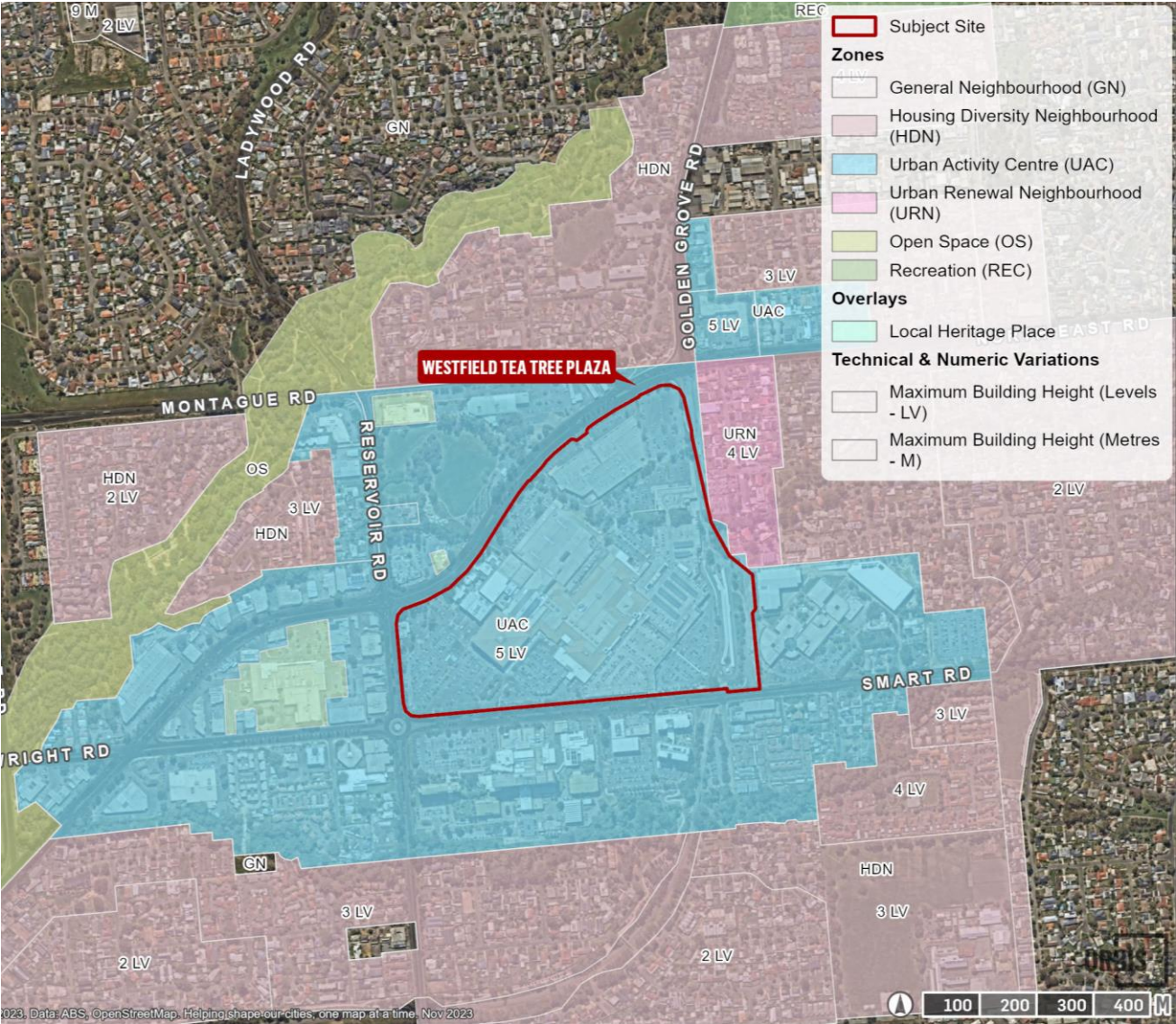
Surrounding Catchment:

- The Urban Renewal Neighbourhood Zone and Housing Diversity Neighbourhood Zone permit predominantly medium density residential development generally between 2, 3 and 4 building levels.
- The Open Space Zone borders the activity centre to the west (providing landscaped open space).

Zone	Desired Maximum Building Height	Desired Density
UAC	5 building levels	medium-to-high densities (35 to >70 du/ha)
URN	4 building levels	predominantly medium density (35 to 70 du/ha)
HDN	ranging between 2, 3 and 4 building levels.	predominantly medium density (35 to 70 du/ha)

Key Observations
The site is considered a 'strategic activity centre' due to its proximity to existing rapid transit (Tea Tree Plaza interchange).
Current strategic policy seeks to increase density within catchment areas of strategic centres (400m of high frequency bus stops and 800m of fixed line transit stations) to the medium to high density range.
Limited areas of heritage and character are evident within the wider locality.
The City of Tea Tree Gully has previously undertaken structure planning for the Modbury Precinct, which identified that Modbury Regional centre is very well placed to accommodate change.












Spatial Mapping









WESTFIELD TEA TREE PLAZA – DEVELOPMENT OPPORTUNITIES

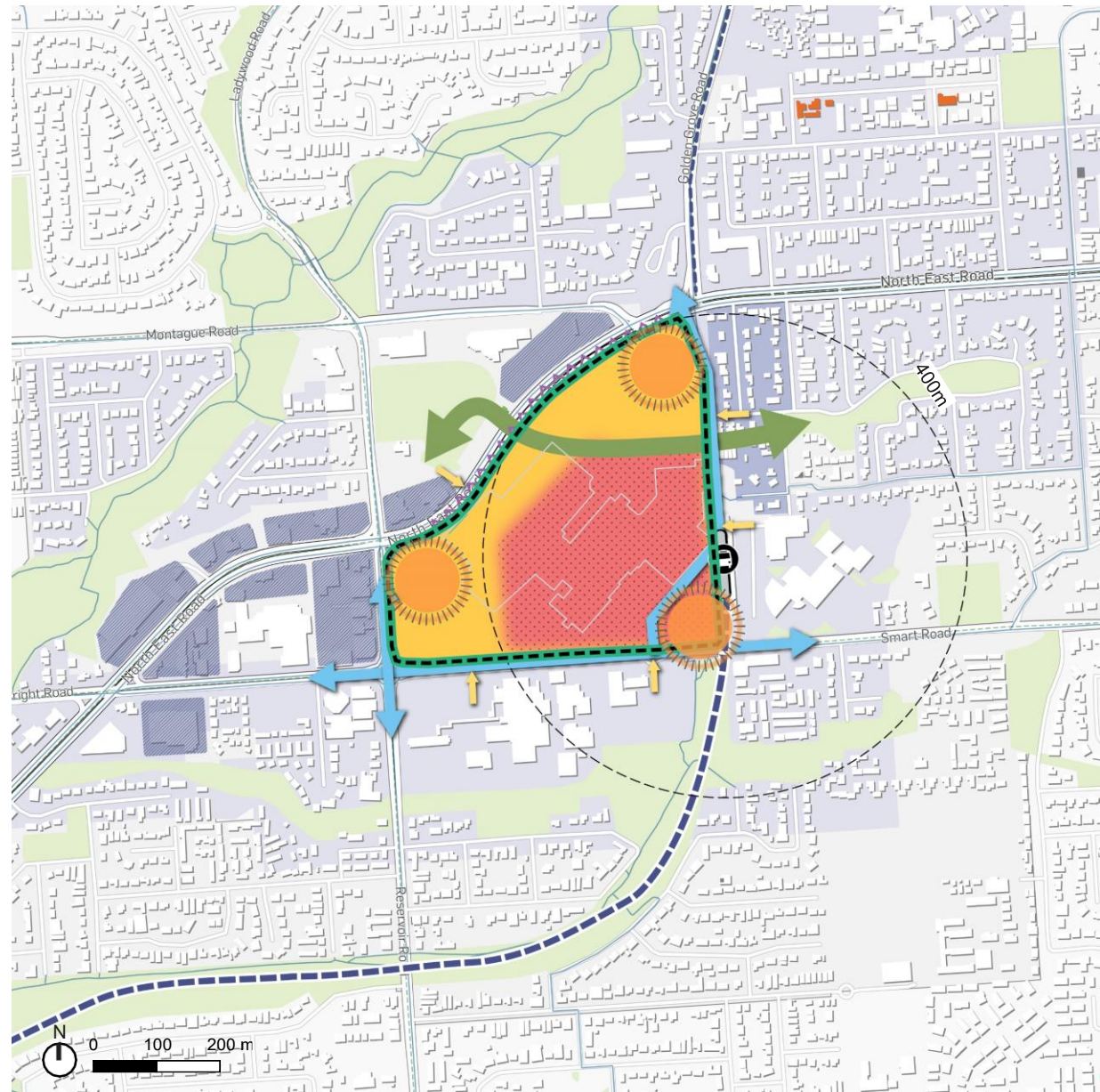
To deliver on the ambitions of the discussion paper and embed the principles of living local, our urban design analysis has indicated:

- The scale of the centre allows for a significant urban core integrated with the O'Bahn interchange.
- The urban core could cater for substantial heights whilst development on the edges could transition in scale to the surroundings.
- The centre will be supported by urban intensification on the site's periphery that will deliver a diverse mix of uses, including medium to high-density housing products.
- There is potential to integrate greenery and open space into the development and enhance the surrounding streetscape with a high-quality public realm.

-  Urban core with greatest opportunity for heights and density
-  High density development framing the street and transitioning from the urban core
-  Taller gateway-built form at corners
-  Opportunities to connect the centre back to the urban grid
-  Potential future high-density development
-  Future high-density housing
-  Future medium density housing
-  Potential green link to surrounding open space
-  Barrier to movement along North East Road
-  Enhanced streetscape and urban greening
-  Human scale street wall at street edge

LEGEND

-  Site boundary
-  Busway
-  Bus route and stops
-  High frequency bus
-  Bicycle network
-  Open space



WESTFIELD WEST LAKES – PLANNING CONTROLS OVERVIEW

Key Planning Controls

Urban Activity Centre Zone

- The zone primarily seeks shops, offices, entertainment, health, education and recreation related uses and other businesses.
- Medium-to-high density residential development generally up to 4 building levels is permitted above non-residential uses.

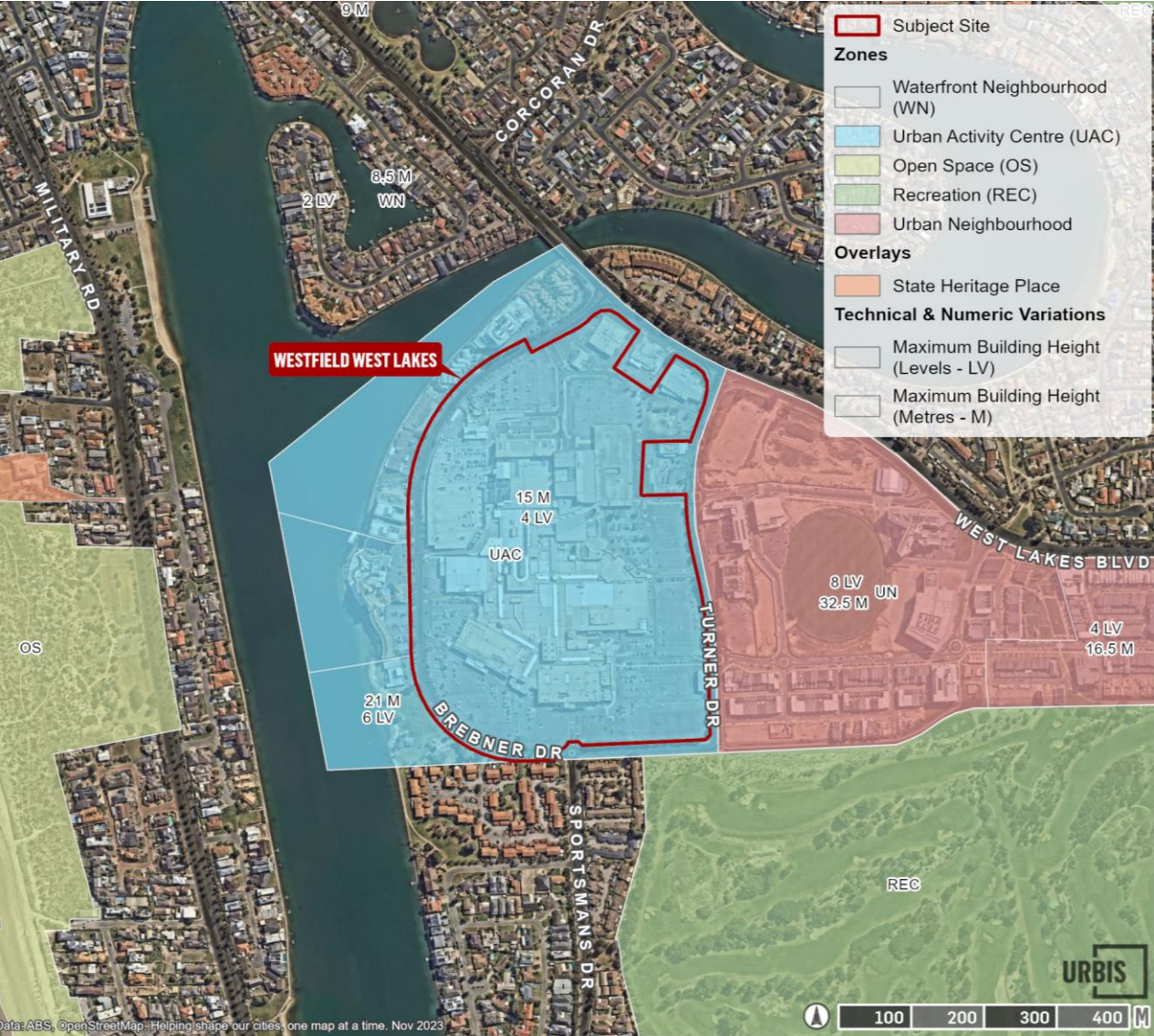
Surrounding Catchment:

- The Urban Neighbourhood Zone provides a flexible policy framework for medium and high-density mixed-use development generally in the range of 4 to 8 building levels.
- The Waterfront Neighbourhood Zone permits generally low-rise housing consistent with the existing pattern of development.
- The Recreation Zone accommodates recreation facilities (existing Grange golf course).

Zone	Desired Maximum Building Height	Desired Density
UAC	4 building levels and 15 metres	medium-to-high densities (35 to >70 du/ha)
UN	4 to 8 building levels across area	medium-to-high densities (35 to >70 du/ha)
WN	2 building levels and 8.5 metres	compatible with existing development pattern

Key Observations
The site is serviced by the West Lakes bus interchange. The current 30-year plan and ITLUP identify the potential for a future tram link to the site.
The 'West' development to the east of the site represents a changing character of the locality, comprising medium and high density development up to 8 storeys.
The GARP discussion paper does not appear to propose this activity centre and catchment area as an investigation area for neighbourhood regeneration, nor a mass rapid transit investigation area.
Limited areas of heritage and character are evident within the wider locality.








Spatial Mapping









WESTFIELD WEST LAKES – DEVELOPMENT OPPORTUNITIES

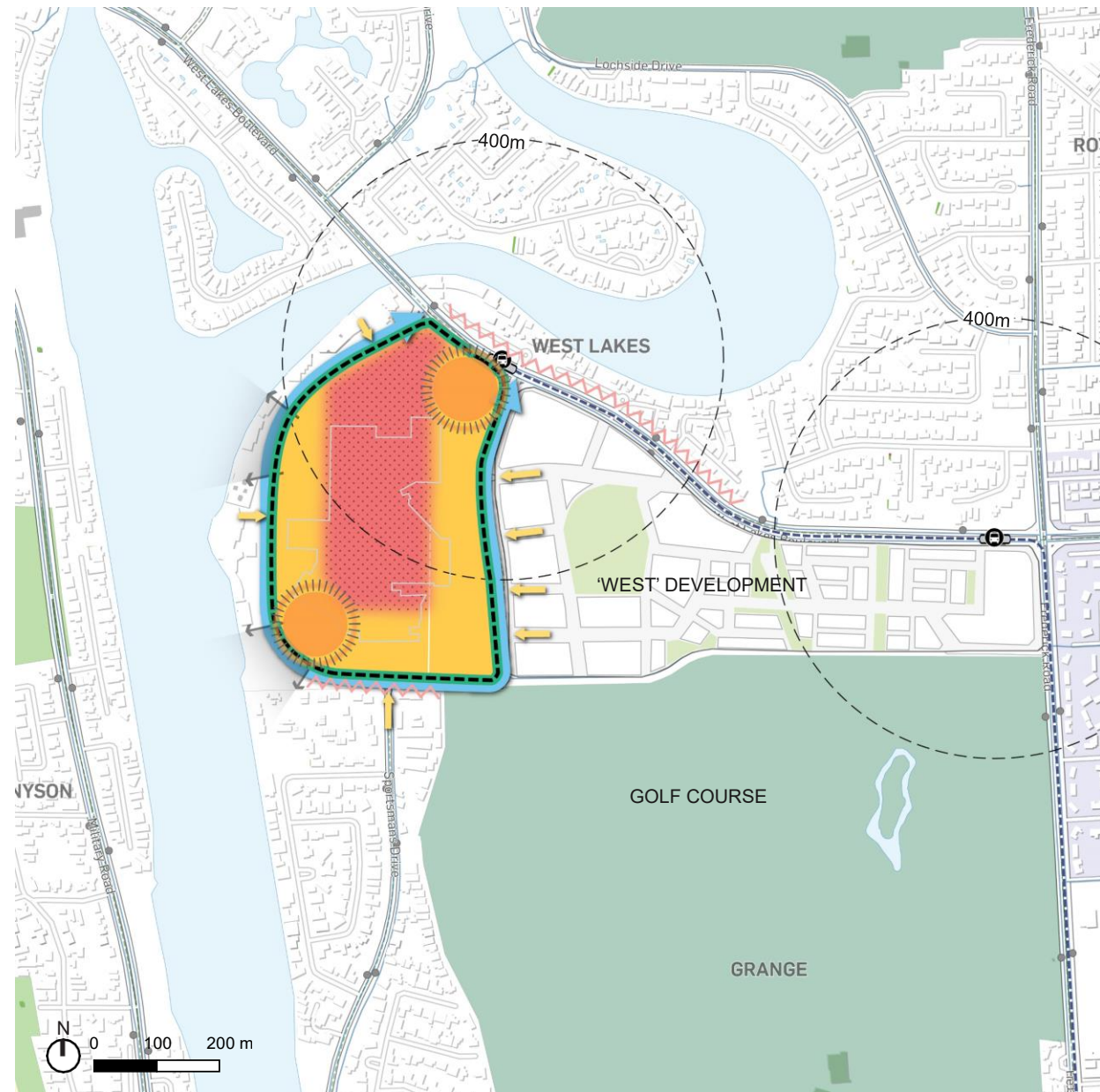
To deliver on the ambitions of the discussion paper and embed the principles of living local, our urban design analysis has indicated:

- The site offers substantial potential for future development, with diverse housing choices, waterfront views and access to amenities and open space.
- The site's development will complement and connect into Adelaide's largest urban regeneration precinct around the historic Football Park. Together, the West Lakes precinct will be a highly livable local neighborhood.
- A potential opportunity may be to extend the proposed tram line and station to better integrate with the development, allowing for future integrated transit.
- The site's redevelopment creates opportunities to introduce a high-quality public realm to the road network edging the centre that is well-activated and encourages pedestrian and cycling. This will help transform the precinct into a unique waterfront urban village in Adelaide.

-  Urban core with greatest opportunity for heights and density
-  High density development framing the street and transitioning from the urban core
-  Taller gateway-built form at corners
-  Opportunities for views
-  Opportunities to connect the centre back to the urban grid
-  Sensitive interface
-  Barrier to movement
-  Enhanced streetscape and urban greening
-  Human scale street wall at street edge

LEGEND

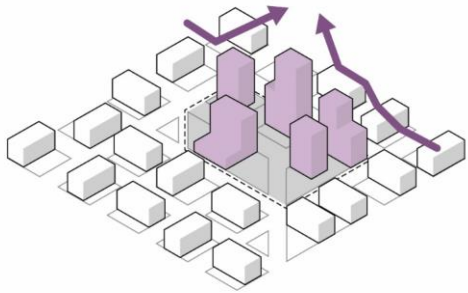
-  Site boundary
-  Proposed Tram & Stops
-  Bus route and stops
-  High frequency bus
-  Bicycle network
-  Open space



DESIGN CONSIDERATIONS TO SUPPORT A THRIVING ACTIVITY CENTRE

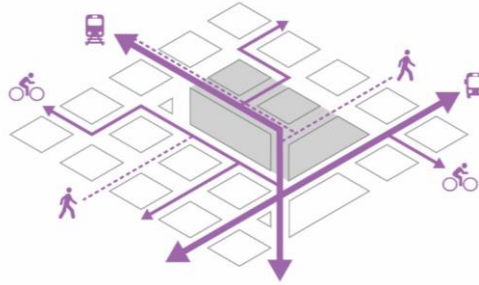
A range of design considerations would help shape the transformation of these major anchors.

Primacy of the urban core



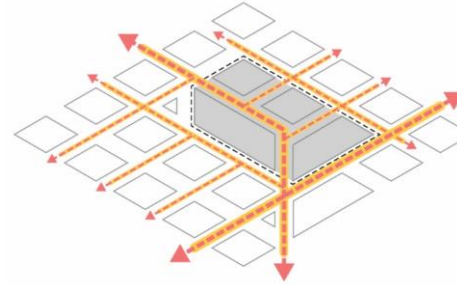
Build on the existing anchor to support demand for mixed-use development. Enable mixed-use intensity to support the activation of the precinct.

Enhanced urban integration



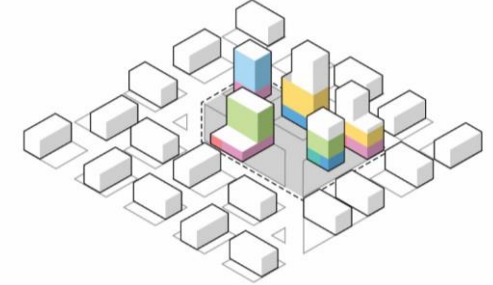
Develop centres to be well-integrated into the surrounding movement network and public transport.

Establish a clear movement hierarchy



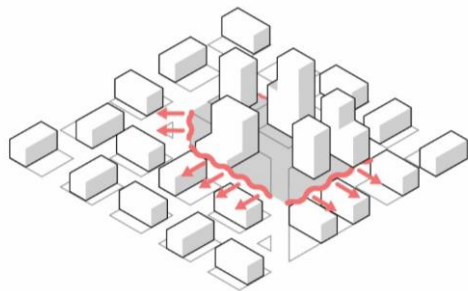
Establish a movement network with a clear hierarchy and allow for various modes of transport, prioritising public and active transport.

Diversify uses



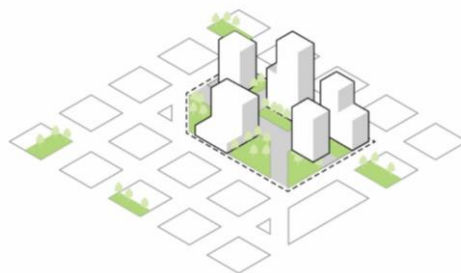
Diversify land uses to create a mixed-use town centre, including new jobs and houses.

Mending the edges



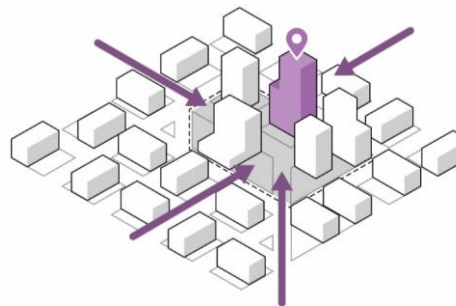
Encourage the development of underutilised land on the edges of the anchor to integrate with the surrounding neighbourhood.

Create place identity



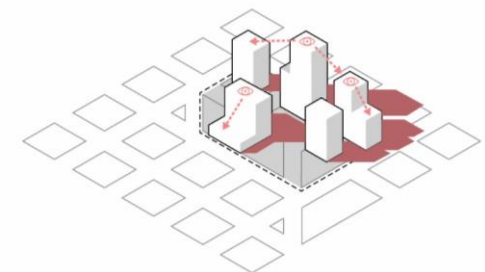
Create a precinct that has a clear and meaningful identity to support a sense of place and attract and retain business and residents.

Landmarks and legibility



Ensure built form responds positively to the surroundings and offers views of landmarks whilst ensuring clear paths to aid pedestrian navigation.

Interface sensitivity



Ensure a sensitive built form transition to the surrounding neighbourhood that does not unreasonably impact off-site amenity.

06

CONCLUSION



CONCLUSION

The Greater Adelaide Regional Plan presents a significant opportunity to set the future framework for growth, housing and how South Australians will live, work and play now and into the future.

Scentre Group's strategic major activity centre sites present a significant opportunity to accommodate sustainable growth as described by the discussion paper, and to subsequently enhance the built environment and quality of life for residents in the southern, western and north-eastern suburbs of Greater Adelaide.

Overall opportunities

- Each site is well serviced by significant existing infrastructure, including high frequency rapid transit, reducing the cost burden of future infrastructure investment at alternative locations.
- Each site is unique to the Adelaide context in terms of size and consolidated ownership, providing opportunities for increased scale whereby overall design outcomes can be holistically considered.
- Each surrounding catchment area has experienced some level of infill development in recent years, however opportunities exist for these areas to be significantly expanded and reviewed with a view to providing greater densities and housing choice in-line with the Commission's 'Living Locally' principles.

Westfield Marion opportunities

- Westfield Marion is serviced by both the Oaklands railway station and Marion bus interchange and surrounded by various community related facilities. Limited areas of established character or heritage are evident within the wider locality.
- Opportunity exists to provide increased scale and above-ground residential outcomes within the activity centre, in addition to expanding the proposed catchment and corridor investigation areas around the centre.

Westfield Tea Tree Plaza opportunities

- Westfield Tea Tree Plaza is well serviced by the existing Tea Tree Plaza interchange. Limited areas of established character or heritage are evident within the wider locality.
- Opportunity exists to provide increased scale and above-ground residential outcomes within the activity centre, in addition to expanding the proposed catchment investigation areas around the centre

Westfield West Lakes opportunities

- Westfield West Lakes is well serviced by an existing bus interchange. Limited areas of established character or heritage are evident within the wider locality.
- The GARP should identify the activity centre as a mass rapid transit investigation area, consistent with the current 30-Year Plan and the ITLUP.
- In-line with the recent 'West' development to the east of the site, opportunity exists to provide increased scale and above-ground residential outcomes within the activity centre. The GARP should identify the surrounding catchment area as an investigation area for neighbourhood regeneration.

General Recommendations

- | | |
|-----------|--|
| R1 | All three sites should be provided with consistent designation as the highest order regional activity centres in Greater Adelaide. |
| R2 | Greater flexibility should be provided in building height and density controls within the Urban Activity Centre Zone at each Scentre Group site. |
| R3 | The State's continued direction for the protection and hierarchy of established retail centres is supported. The GARP should not promote an increase in out of centre retailing. |
| R4 | The GARP should highlight the importance of continued public investment in infrastructure and public transport associated with each activity centre. |

Westfield Marion Recommendations

- | | |
|-----------|--|
| R5 | The Commission's proposed Morphett Road urban corridor investigation area is supported. Consideration should be given to expansion around the perimeter of the Westfield Marion site. |
| R6 | The Commission's proposed centre and neighbourhood regeneration areas surrounding Westfield Marion are supported. Current catchment areas should be expanded to support greater housing choice near existing services. |

Westfield Tea Tree Plaza Recommendations

- | | |
|-----------|---|
| R7 | The Commission's proposed centre and neighbourhood regeneration areas surrounding Westfield Tea Tree Plaza are supported. Current catchments should be expanded to support greater housing choice in these areas. |
|-----------|---|

Westfield West Lakes Recommendations

- | | |
|-----------|---|
| R8 | Westfield West Lakes should be identified as a mass rapid transit investigation area consistent with the current 30-Year Plan and ITLUP. |
| R9 | The Westfield West Lakes activity centre and surrounding catchment areas should be identified as an activity centre and neighbourhood regeneration area to support greater housing choice near existing services. |



DTI:PlanSA Submissions

From: Chris Vounasis [REDACTED]
Sent: Monday, 6 November 2023 8:39 AM
To: DTI:PlanSA Submissions
Subject: Submission to the Discussion Paper on the GARP - Sellicks Beach
Attachments: St Vincent Submission.pdf

Dear Growth Management Team,

Please see **attached** submission to the Discussion Paper for the Greater Adelaide Regional Plan in relation to Allotment 95 CT Volume 5749 and Allotment 51 CT Volume 6244 Folio 135 in Sellicks Beach.

Please confirm receipt of the submission.

Kind Regards

CHRIS VOUNASIS
Managing Director



[REDACTED]
W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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5 November 2023

State Planning Commission
C/- Growth Management Team and Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
ADELAIDE SA 5000

SUBMISSION – GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

We act for St Vincent Pty Ltd (“St Vincent”).

St Vincent is the owner of the land described as Allotment 95 in Certificate of Title Volume 5749 Folio 460 and Allotment 51 in Certificate of Title Volume 6244 Folio 135 identified in figure 1 below.

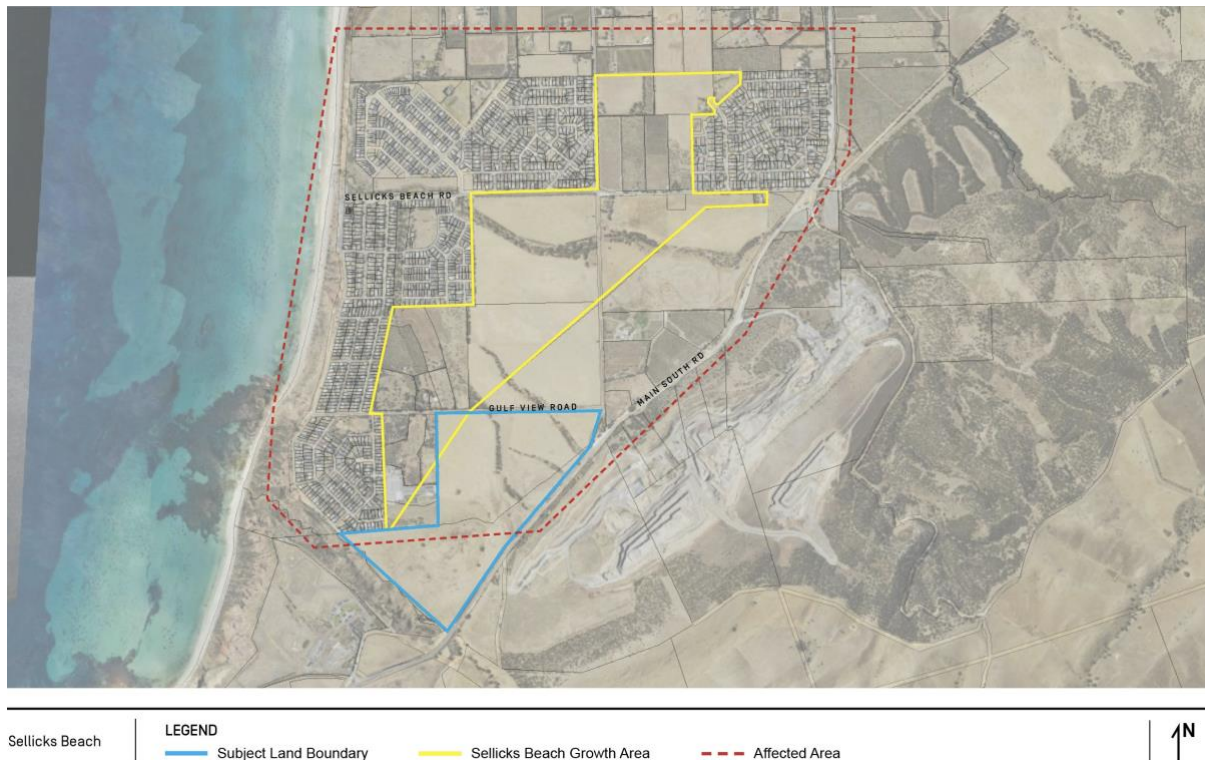
Figure 1 *The St Vincent land interest*



St Vincent has an interest in the Greater Adelaide Regional Plan (“GARP”) as Sellicks Beach is identified as a future growth area.

The land is located within the Affected Area of the Proposal to Initiate of the Sellicks Beach Code Amendment and is partially located within the Sellicks Beach Growth Area (“SBGA”) as depicted in figure 2 below.

Figure 2 Sellicks Beach Growth Area



St Vincent has no intention on developing the land in the short to medium term however considers the land to have strategic significance in the delivery of cost effective infrastructure to support the affordable delivery of future housing supply. Such has been well documented as being in particularly short supply in the Outer South of Adelaide.

The Code Amendment seeks to rezone land to facilitate the managed residential growth of Sellicks Beach with appropriate civil infrastructure as well as social, recreation, commercial and retail services to support the growing population. In parallel to the Code Amendment, the State Government is working with local government, landowners, utilities, and other major stakeholders to ensure appropriate agreements are in place to facilitate coordination, funding, timing and the delivery of critical infrastructure. To facilitate these outcomes Infrastructure Schemes are being further investigated along with other agreement types such as deeds and conditions of approval. A fit for purpose approach to infrastructure agreements will be pursued.

There are four objectives in initiating this Code Amendment. These are stated as follows:

- *To plan and develop land within the SBGA in an orderly and coordinated manner.*
- *To maximise the advantages a master planned project of this scale can offer the community, while avoiding unexpected costs to Local and State Government.*
- *Establish infrastructure agreements to ensure the timely provision and funding of infrastructure to support the new community and appropriately integrate with the broader region.*
- *To implement an arrangement which ensures the release of land at a pace which reflects market demand and infrastructure provision.*

Whilst the majority of the land is located within the Character Preservation District, a portion of the land is located within the SGBA, and when considered as a whole, sits between the existing and developed Suburban Neighbourhood Zone and Main South Road.

This is important in the context of the objectives of the SBGA, in that:

- If the whole land was to be included in the SBGA, the overall scale of the project would increase allowing infrastructure costs to be spread over a greater area and thus minimise unexpected costs to Local and State Government;
- The consideration of additional land strategically located between the established built-up area and Main South Road allows infrastructure agreements to be established over a greater area and to better integrate with the existing road network. This has the benefit of spreading infrastructure costs over a greater area and better integrating with the broader region; and
- The attributes of the land represent a logical future infill opportunity between developed land and major road infrastructure supporting an orderly and coordinated approach should the land be developed.

St Vincent acknowledges that a legislative change is required to alter the boundary of the Character Preservation District to include the whole land in the SGBA, however in this particular case, there is both planning and infrastructure logic to expand the SBGA to Main South Road. Identifying such in the GARP provides a clear and transparent signal of the longer-term land release strategy at Sellicks Beach and also assists in improved regional infrastructure planning.

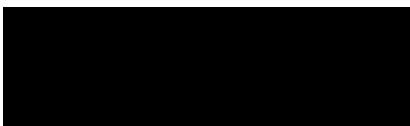
The State Planning Commission and/or Planning and Land Use Services should not feel any discomfort that this approach may encourage St Vincent or others to seek a rezoning of the land. We are of the opinion that it is possible to rezone land within the Character Preservation District before the relevant legislation is changed because regardless of the type of residential zone contemplated, the Character Preservation District Overlay will still provide the necessary protection until such time the land is needed. In many ways, the Overlay can be used as a similar mechanism to that of the Deferred Urban Zone. The key benefits with this approach, is twofold:

1. The land can be masterplanned and the infrastructure requirements understood at an earlier stage feeding into, or being cognisant of, the Sellicks Beach Code Amendment; and
2. Recognising the longer-term infrastructure requirements at an earlier stage provides an economic benefit to the land owners and/or developer interests that currently exist within the SBGA by spreading infrastructure costs over a greater area.

The Overlay can simply be removed at the appropriate time, with the zone already in place and the infrastructure requirements and costs known.

In our opinion, this is an effective strategic planning approach that offers protection and certainty whilst supporting the orderly and economic delivery of infrastructure beyond the current SBGA.

Yours sincerely

A solid black rectangular box used to redact the signature of Chris Vounasis.

Chris Vounasis
Managing Director

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Submissions close on Monday, 6 November 2023.

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Greater Adelaide Regional Plan Discussion Paper ▼

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Member of the public ▼

Given name * (required)

Stanley

Family name * (required)

Andronikidis

Organisation

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Enter a 10 or 8 digit phone number. For example: 0412345678 or 0212345678

Comments * (required)

max 2000 characters

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Max. 2000 characters.

[REDACTED] Kudla 5115,

My wife & I would like to Reduce
The size of our land. to 1/2 acre
allotments.

[REDACTED]

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Amendment * (required)

Greater Adelaide Regional Plan Discussion Paper ▼

Customer type * (required)

Member of the public ▼

Given name * (required)

Stavros

Family name * (required)

Varelhas.

Organisation**Email address * (required)****Phone number * (required)**

Enter a 10 or 8 digit phone number. For example: 0412345678 or 0212345678

Comments * (required)

max 2000 characters

Comments* (required)

Max. 2000 characters.



Kudla.

We would like to subdivide
our land into $\frac{1}{4}$ acre blocks

DTI:PlanSA Submissions

From: Ryan Moyle [REDACTED]
Sent: Monday, 6 November 2023 3:42 PM
To: DTI:PlanSA Submissions
Cc: John Karytinios
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper - The Karytinios Family
Attachments: 01501_007_20231103_GARP Submission_Karytinios_FINAL.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dear Sir/Madam,

Please find attached a submission to the *Greater Adelaide Regional Plan Discussion Paper* on behalf of **The Karytinios Family**, who own a significant landholding within Two Wells.

We look forward to the next stages of preparation of the Draft *Greater Adelaide Regional Plan*.

Kind regards,

Ryan Moyle
Senior Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000



www.ekistics.com.au



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

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3 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: SUBMISSION ON THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER – OPPORTUNITY FOR TWO WELLS TOWNSHIP EXPANSION (TWO WELLS WEST)

1. INTRODUCTION

We act for The Karytinios Family ['Karytinios'], who own and control a substantial landholding on the western side of Port Wakefield Highway (the 'subject land'), within the Adelaide Plains Council.

This submission relates to land comprising 14 parcels across an area of 1,893 hectares (the 'subject land') located within Two Wells and to the west of Port Wakefield Highway. The subject land is located within area that has been identified as a 'Growth Investigation Area' and 'Employment Growth Investigation Area' under the Greater Adelaide Regional Plan Discussion Paper (the 'Discussion Paper'). This submissions seeks the inclusion of the subject land as a future urban growth area in the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years).

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Regional Plan for Greater Adelaide and seeking wide input to inform the setting of the strategic direction on how and where Greater Adelaide should grow.

This submission, prepared on behalf of Karytinios, is provided to support identification of the area to the west of Two Wells as a future urban growth area in the next Regional Plan for Greater Adelaide.

As set out in the submission below, the subject land is highly suitable for urban expansion based on its single ownership and limited constraints. It is well positioned to be developed to meet the urban growth needs for Greater Adelaide.

2. THE SUBJECT LAND

2.1. Land Description / Identification

The subject land comprises the following fourteen (14) Certificates of Title, as listed below and as illustrated in **Figure 3.1**:

1. Allotment 3 in Deposited Plan 22799 - Certificate of Title Volume 5439 Folio 388;
2. Block 28 in Deposited Plan 1671 - Certificate of Title Volume 5494 Folio 881;
3. Allotment 4 in Deposited Plan 22799 - Certificate of Title Volume 5439 Folio 400;
4. Block 33 in Deposited Plan 1671 - Certificate of Title Volume 5494 Folio 882;
5. Block 37 in Deposited Plan 1671 - Certificate of Title Volume 5494 Folio 883;
6. Allotment 6 in Deposited Plan 14648 - Certificate of Title Volume 5473 Folio 828;
7. Allotment 2 in Deposited Plan 16263 - Certificate of Title Volume 5465 Folio 186;
8. Allotment 7 in Deposited Plan 14648 - Certificate of Title Volume 5473 Folio 2;
9. Allotment 100 in Deposited Plan 14649 (Lot 10 Middle Beach Road, Two Wells)
Certificate of Title Volume 5452 Folio 477;
10. Allotment 3 in Filed Plan 16263 (118 Halstead Road, Two Wells) - Certificate of Title Volume 5464 Folio 997;
11. Allotment 1 in Filed Plan 6893 (34 Windmill Road, Two Wells) - Certificate of Title Volume 5117 Folio 775;
12. Allotment 3 in Filed Plan 9413 (14 Windmill Road, Two Wells) - Certificate of Title Volume 5999 Folio 438;
13. Allotment 1 in Filed Plan 16905 (2 Buckland Park Road, Two Wells) - Certificate of Title Volume 5351 Folio 616;
and
14. Section 160 in Hundred Plan 1401800 (12 Buckland Park Road, Two Wells)
Certificate of Title Volume 5534 Folio 165.

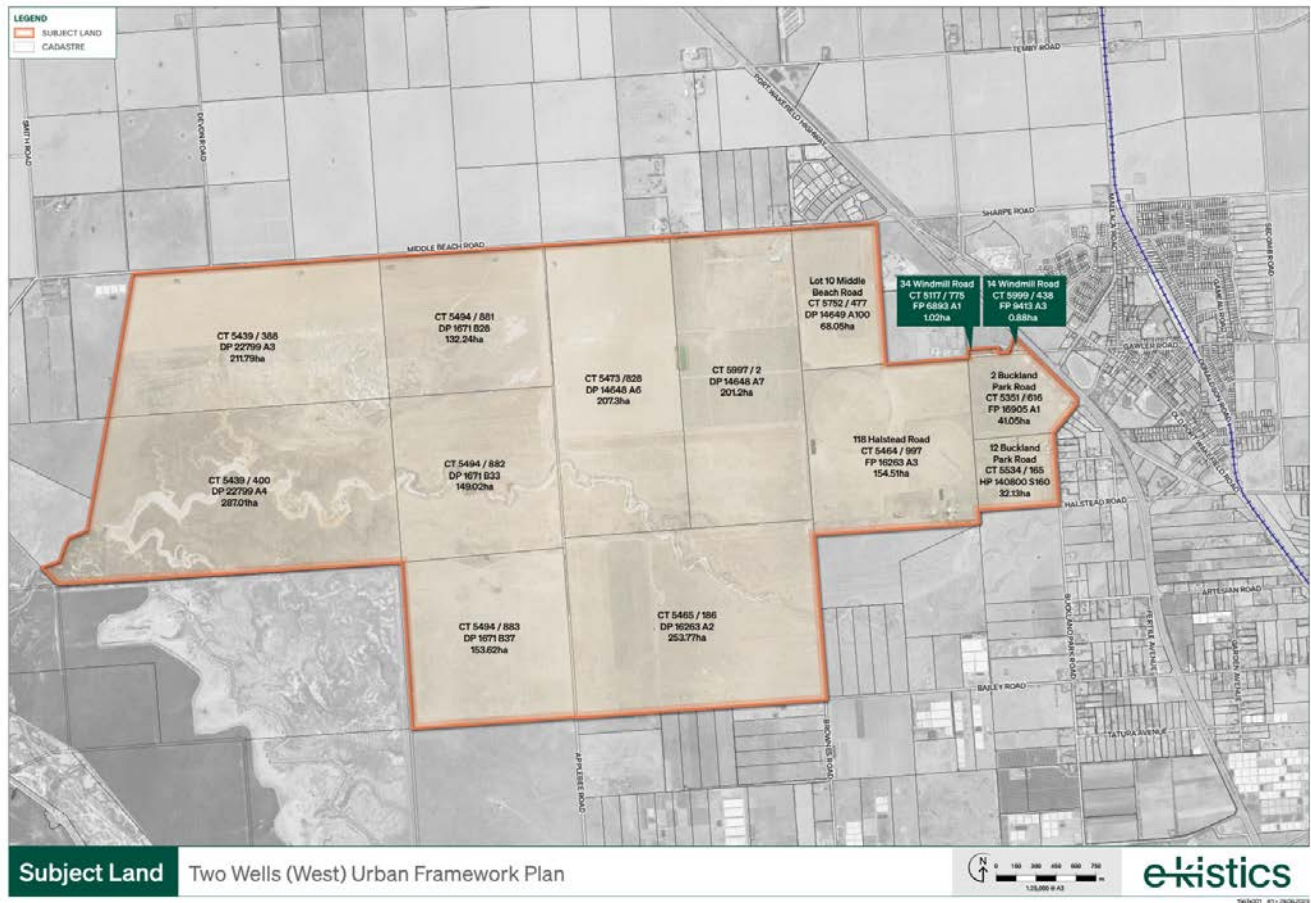


Figure 2.1: Aerial of Subject Site

The landholding comprises an overall area of approximately 1,893 hectares, with key frontages to Middle Beach Road, Bailey Road, Buckland Park Road and Port Wakefield Highway. The subject site is largely flat with slight undulations adjacent to Salt Creek and is currently used for low intensity agricultural purposes such as grazing and horticulture.

Salt Creek dissects the subject land, and traverse in an east-west direction towards Middle Beach located further west.

The eastern most edge of the subject land is bounded by Port Wakefield Highway, an arterial road under the care and control of Commissioner of Highways (under Department for Infrastructure) which carries approximately 13,300 vehicles per day in this location.

The subject land comprises several dwellings and agricultural structures (large sheds, pump sheds etc), primarily in the western portion of the land. Several parcels are completely vacant of any structures.

Relevant to this submission, the current land has not been productive for horticultural purposes, despite the landowners best attempts in exploring a range of options, leaving the landholding largely underutilised.

2.2. The Locality & Context

The subject land is situated in an area comprising a mixture of land uses types, and given the scale of the land, interfaces with a variety of different land uses.

To the north of Middle Beach Road, and adjacent to Port Wakefield Highway, there are a series of industrial and logistics businesses. This land is situated within the 'Strategic Employment Zone', a zone that extends to the south of Middle Beach Road into the subject land. Further south of this industrial estate is a bulk handling facility situated within the 'Employment (Bulk Handling) Zone'.

To the east of Buckland Park Road and between the subject land and Port Wakefield Highway, comprises a series of rural living allotments. Some of these allotments also serve a dual function for business purposes and are situated within the 'Rural Living Zone'.

To the south of the site, and south of Bailey Road West, there are a number of horticultural and agricultural land uses (including horse husbandry). The 'Buckland Park Weather Station' operated by the Bureau of Meteorology is located to the south of the subject land and the radar structure is visible from the broader locality due to its height. Notably, the site is connected to the south via Buckland Park Road and terminates at the Gawler River, with the Riverlea Estate located immediately south of the Gawler River.

To the west of the subject land is Middle Beach, which includes a series of salt evaporation pans located between the subject land and the Middle Beach settlement. Salt Creek traverses from the subject land through these salt evaporation pans. Further south-west of this area is the Upper Gulf St Vincent Marine Park, which extends into wetland areas around the Middle Beach settlement.

2.2.1. STRATEGIC CONTEXT - ADELAIDE PLAINS COUNCIL

Adelaide Plains is one of SA's fastest growing Councils, with 80% of known population growth around the township of Two Wells facilitated by the approval of the 'Two Wells Residential Development Plan Amendment' (DPA) in 2013 which enabled the expansion of the Two Wells township by an additional 3,000- 3,500 dwellings and an anticipated 8,000 and 11,000 new residents. The majority of growth has occurred to the north of the established township in the Hickinbotham Eden Estate and the Liberty Estate.

Council has recently adopted a 'Growth Strategy and Action Plan' (GSAP) at its meeting on 24 April 2023 to identify strategies and actions to achieve the liveable population growth of Adelaide Plains. A key initiative of the GSAP is the establishment of a 'three town service model' with sustainable growth within Two Wells, Mallala and Dublin (refer to **Figure 2.2**).

The GSAP envisages a cohesive country community of 10,500 people in Two Wells with actions to support township growth including a revitalised Main Street, a Council / Community civil hub, a walking and cycling plan, an expanded recreation and sport hub and increased housing options via a 'Community Waste Water Management Scheme' (CWMS) for the original township. It is noted at the preparation of GSAP, Council were unaware of the subject land opportunity within Two Wells West.



Figure 2.2 'Three town service model' - Growth Strategy and Action Plan' (Source: Adelaide Plains Council)

As part of preparation of this submission and the Concept Urban Framework Plan outlined in Section 5 below, a comprehensive review of relevant policy across State Government and Adelaide Plain Council was undertaken, including State Planning Policies, The Regional Plan - The 30-Year Plan for Greater Adelaide – 2017 (Update), and key Council strategic plans such as the Adelaide Plains Strategic Plan 2020-2024, the Adelaide Plains Council Growth Strategy & Action Plan, and more. In summary, the key findings of this review which are relevant to the subject land are as follows:

- The Two Wells township and town centre is undergoing substantial community & social infrastructure investment to cater for anticipated rapid growth and expansion of Two Wells;
- Key projects of the new 'Town Centre Development Site' and 'Two Wells Oval Precinct' currently being undertaken by Council, are located within close proximity to the subject land;
- A clear direction across all levels of government for the short term delivery of substantial volumes of affordable housing, particularly in areas that are established, well-serviced, & connected to jobs;
- New housing & jobs should be established along key transport corridors;

- Improving access to Two Wells township should be a focus, whilst maintaining Port Wakefield Road as key transport corridor;
- Building community resilience to the effects of climate change (WSUD, Renewable energy generation & storage);
- Securing South Australia's electricity network through renewable energy & storage;
- Protection of prime agricultural & horticultural land; and
- Preservation of conservation land & biodiversity.

2.2.2. STRUCTURAL ANALYSIS OF TWO WELLS TOWNSHIP

2.2.2.1. Two Wells Township Structure

Two Wells has historically been situated adjacent the Port Wakefield Highway, which has served as the primary connection from Adelaide to the Yorke Peninsula and beyond to far north South Australia and interstate. The majority of Two Wells historic buildings are located within the Town Core, and represents the original settlement which was located on the Former Port Wakefield Highway alignment (now known as Old Port Wakefield Road).

The Town Core has therefore long functioned as the civic and cultural centre for Two Wells, and comprises the bulk of key services and commercial businesses. The earliest residential areas of Two Wells developed around the Town Core, and extended eastward.

The railway line was established, which effectively dissected the established residential area. Large rural living allotments developed to the south and outer east of the township, including to the south of Salt Creek. Over time, the culmination of the railway line, Salt Creek and Port Wakefield Highway, have provided barriers to residential development in a southern, western and eastern direction. Although some new residential growth has occurred to the east of the railway, it is noted that it is likely a future grade separation of the road and rail will be required in the future to link this area to Two Wells township and Port Wakefield Highway.

This has resulted in the northern wedge of residential growth being the focus for new housing development for Two Wells. In 2013, the 'Two Wells Residential Development Plan Amendment' reflected this through rezoning of substantial areas of land within the northern area of the township and the Liberty Estate has already seen development of its earliest stages. Future land north of the Liberty Estate is already zoned for residential growth, which will see new urban areas being located up to 3km from the central Town Core.

Employment land has typically been located on a northern wedge of the township, adjacent and to the west of the Port Wakefield Highway.

With the subject land located at the western edge of the existing Two Wells township, this creates a new opportunity to locate a growth front within close proximity to the Town Core. A new western urban growth front would ultimately transform

Two Wells into maintaining a more compact form, and allow growth to continue in a concentric manner. The benefits of a concentric township form would improve access to existing infrastructure and services for new residents.

UNDERSTANDING TWO WELLS

- Town Core
- An upgraded (future) main street
- Established Residential
- Established Employment & Industry
- Established Rural Living
- Residential Growth
- Port Wakefield Highway key freight route
- Rail corridor (freight)
- Future Town centre and recreation precinct
- Salt Creek & biolink

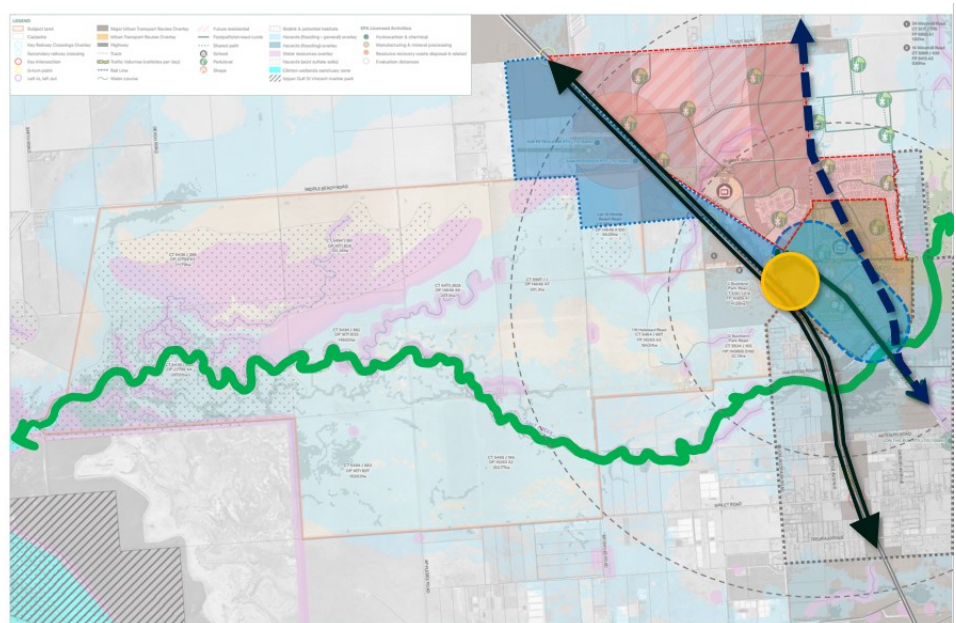


Figure 2.3- Two Wells Township – Structural Analysis

2.2.2.2. Two Wells Town Centre Expansion

The 'Two Wells Town Centre DPA' was approved in 2016 to facilitate the future development of the town centre and the Adelaide Plains Council purchased eight (8) hectares of 'Crown land' in the heart of Two Wells for the purposes of delivering commercial, retail and community facilities to the township (refer to **Figure 2.4**)

The land is bound by the Port Wakefield Highway, Old Port Wakefield Road, Wells Road and Windmill Road with extensive exposure to the historic main street. Importantly the land identified for the proposed expansion of the Two Wells town Centre is directly opposite the subject land, over Port Wakefield Highway.

Council is now in the process of developing a conceptual masterplan for purposes of delivering a mix of commercial, retail and community facilities. The town centre is envisioned to be a high-quality public realm with a mix of retail, commercial, and community offerings complemented by high quality landscaped and civic open spaces. The significant investment in the Two Wells township is important in the context of the subject land, as it represents a unique opportunity to unlock a new growth front for Two Wells and capitalise on this expanded town centre.



Figure 2.4- Two Wells Town Centre Project – Concept Plan (Source: Adelaide Plains Council)

The Two Wells Town Centre expansion project will therefore see a substantial increase to the Town Core footprint, immediately adjacent the subject land, and undergo significant investment in new services and retail. The proposed Two Wells West development would further support, underpin and maintain the primacy and vitality of this important and expanding Regional Centre.

2.3. Existing Zone & Policy Framework

The subject land is currently located within the ‘**Rural Horticulture Zone**’, ‘**Conservation Zone**’ and ‘**Strategic Employment Zone**’ of the Planning and Design Code (Version 2023.15 dated 26 October 2023). **Figure 3.2** identifies the current zoning that applies to the subject site and surrounding properties.

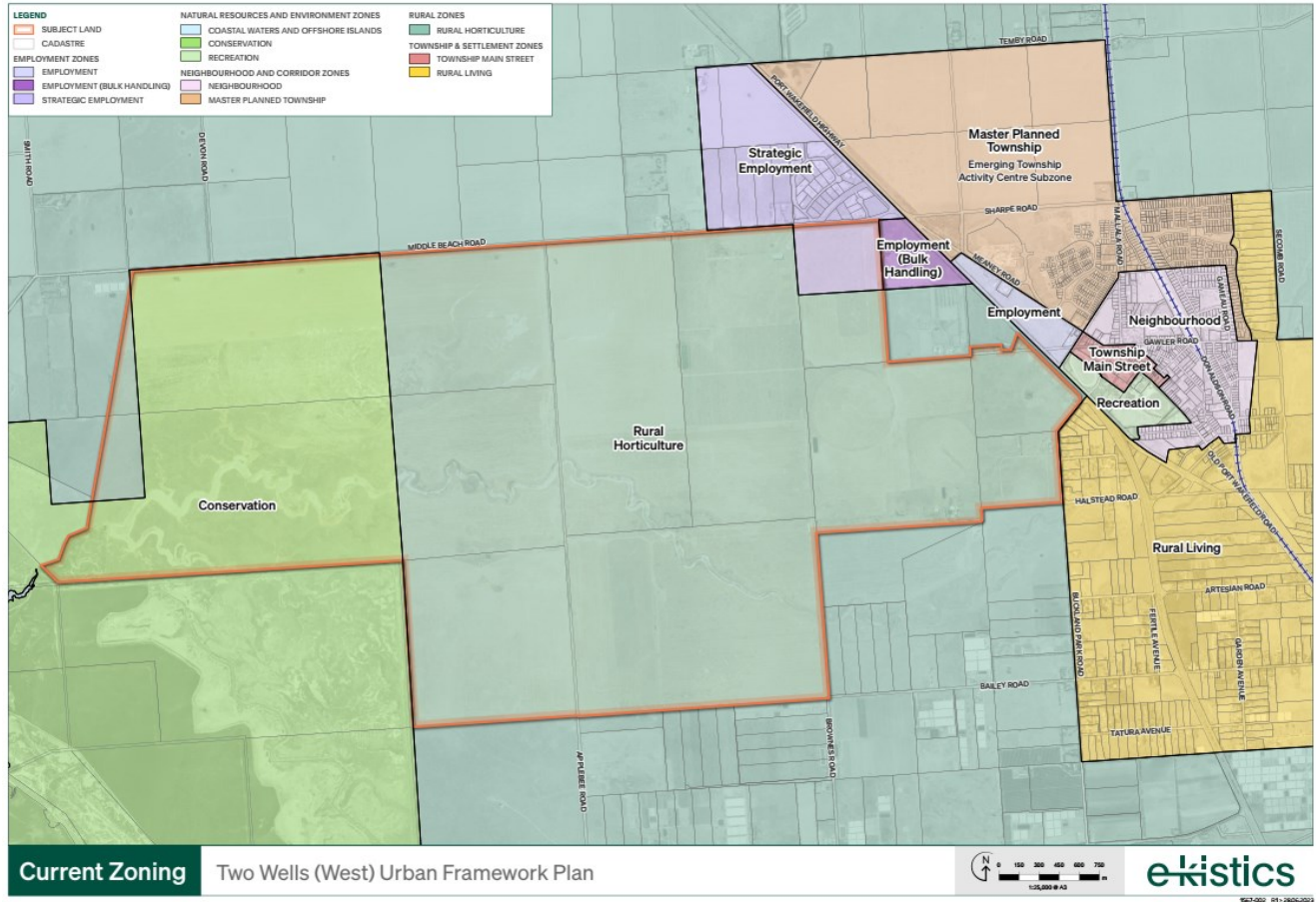


Figure 2.5 – Existing Zoning

The subject land is affected by a number of 'Overlays' as follows:

- Defence Aviation Area - All structures over 90 metres
- Environment and Food Production Area
- Hazards (Acid Sulfate Soils)
- Hazards (Flooding)
- Hazards (Bushfire - General)
- Hazards (Flooding - General)
- Major Urban Transport Routes
- Native Vegetation
- Prescribed Water Resources Area
- Traffic Generating Development
- Water Resources

3. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

The Greater Adelaide Regional Plan (GARP) Discussion Paper identifies that current population projections demonstrate that by 2051 we must plan for an additional 670,000 people in Greater Adelaide. The Paper outlines that we need to supply 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes beyond the current capacity for an additional 200,000 homes (164,000 homes in land already zoned for residential development and a further 47,000 homes that could be accommodated on land already identified for future residential rezoning). The Paper identifies that an additional 100,000 homes is the equivalent of 10 Concordia or Dry Creek developments, and that under this growth scenario that we will run out of land for future residential development within Greater Adelaide within 30 years if an ongoing rezoning program is not developed.

The Discussion Paper has identified that growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success.

The Paper projects that the highest proportion of new growth will be located within the 'Outer North' area, with almost 18,200 new homes or 18% of the projected growth within this area of Greater Adelaide (refer to **Figure 3.3** below).

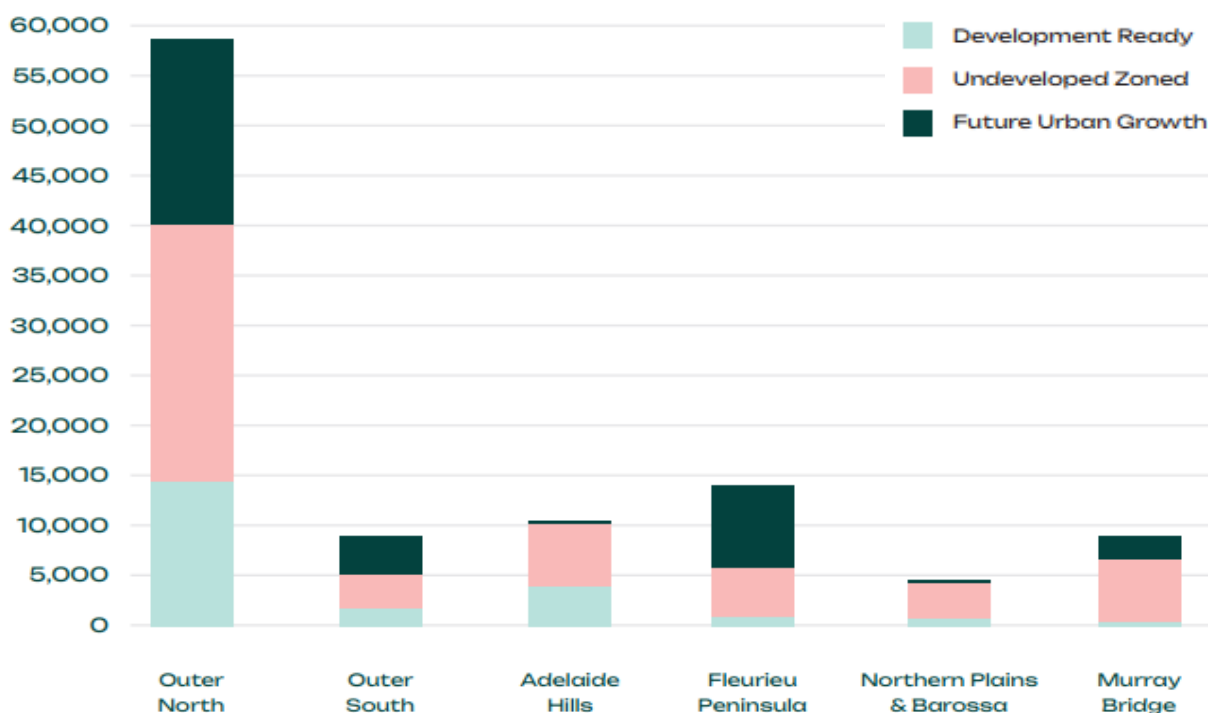


Figure 3.1: Projected Future Land Supply CBD

(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023, page 108)

The Discussion Paper identifies four (4) main greenfield 'Investigation Areas' on the fringe of Metropolitan Adelaide for future housing and employment growth, with these areas being based on the State Planning Commission's seven (7) identified land supply principles identified in the Paper.

The areas proposed for detailed investigation extend from Adelaide's four major transport spines with the intent to capitalise on ongoing government investment along these growth corridors.

This includes a 'north-west spine' that begins at the southern end of the Port Wakefield Highway stretching northward past the Riverlea development to Two Wells, and then continues further north along the highway.

The land to the north-west, west and south-west of Two Wells township is identified as a proposed 'Growth Investigation Area' for both housing and employment growth, as identified on **Figure 3.2** and **3.3** respectively below. We note the following challenges identified in the Discussion Paper for the 'north-west spine' and the suitability of the subject land to address each of the challenges identified:

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
<ul style="list-style-type: none"> - Much of the area for investigation is currently part of the EFPA. This means that land would not be made available for development in the short term, until other land within the urban area is developed. - Any proposals to rezone land in the EFPA requires assessment against the need for this land for long term residential or employment growth, and its landscape, environmental or food production significance. 	<p>The Paper identifies that land within the current EFPA would likely meet future growth needs in the 16-30 year period.</p> <p>Whilst noting the location of the subject land within current EFPA, we note that the land is contiguous with existing land used of residential purposes and is located within close proximity to the existing (and future expanded) Two Wells town centre. This represents a logical expansion of the Two Wells township in a concentric manner, and maximises the strategic location of the site to existing services and infrastructure, as well as future investment within the township core. The land can be immediately developed given access to existing transport networks and services (i.e. does not need to wait for the 16-30 year period).</p>
<ul style="list-style-type: none"> - The area is currently not supported by high frequency public transport and would require significant 	<p>The subject land provides substantial opportunity for a master planned development comprising up to 9,000 dwellings and significant increases to employment land for Two Wells. This growth, in addition to ongoing growth in</p>

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
investment in trunk infrastructure to support urban growth	other areas of Two Wells, nearby Virginia and Buckland Park, would support, underpin and justify future investment in public transport (such as high frequency bus routes).
- It will be important to encourage future employment growth in this region to facilitate a greater level of regional employment self-sufficiency	<p>The subject land currently comprises large undeveloped areas of land located within the 'Strategic Employment Zone', measuring approximately 34 hectares.</p> <p>The subject site is also identified within the GARP Discussion Paper as an 'Employment Growth Investigation Area'. Given the size and composition of the landholding there are further opportunities for additional employment and commercial land uses, including activity centre(s), where it doesn't undermine the role and primacy of the existing Two Wells township as the primary Regional Centre.</p> <p>The Karytinis Family who own and operate Olympic Industries, have also indicated interest in the potential relocation (and expansion) of its Para Hills West operation to the subject site. This has the potential to bring in at least 200 jobs (FTE) to Two Wells.</p>
- Hazards and environmental issue such as flooding would need to be considered and managed.	Early analysis of the subject site has identified the ability to develop an appropriate response to the management of drainage across the site without the need for substantial earthworks and encouraging the collection, treatment and re-use of stormwater as part of a water sensitive urban design (WSUD) outcome.

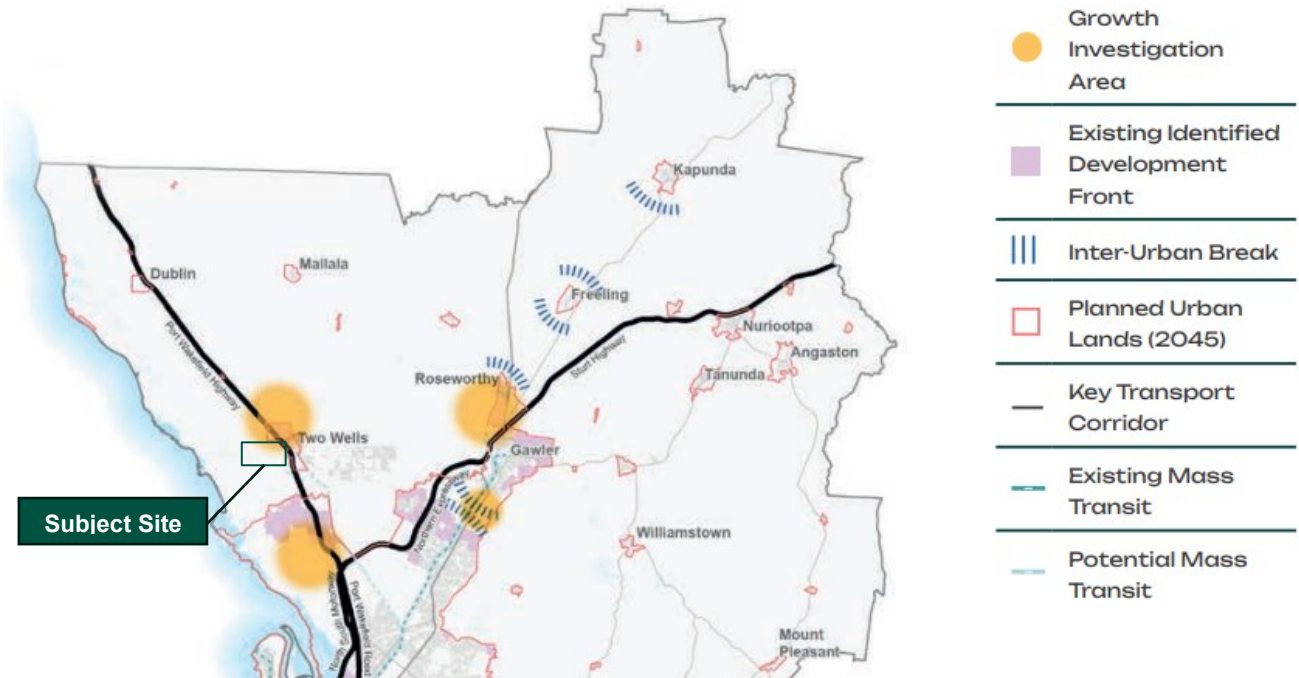


Figure 3.2: Proposed 'Growth Investigation Areas', north of Adelaide CBD
(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023)

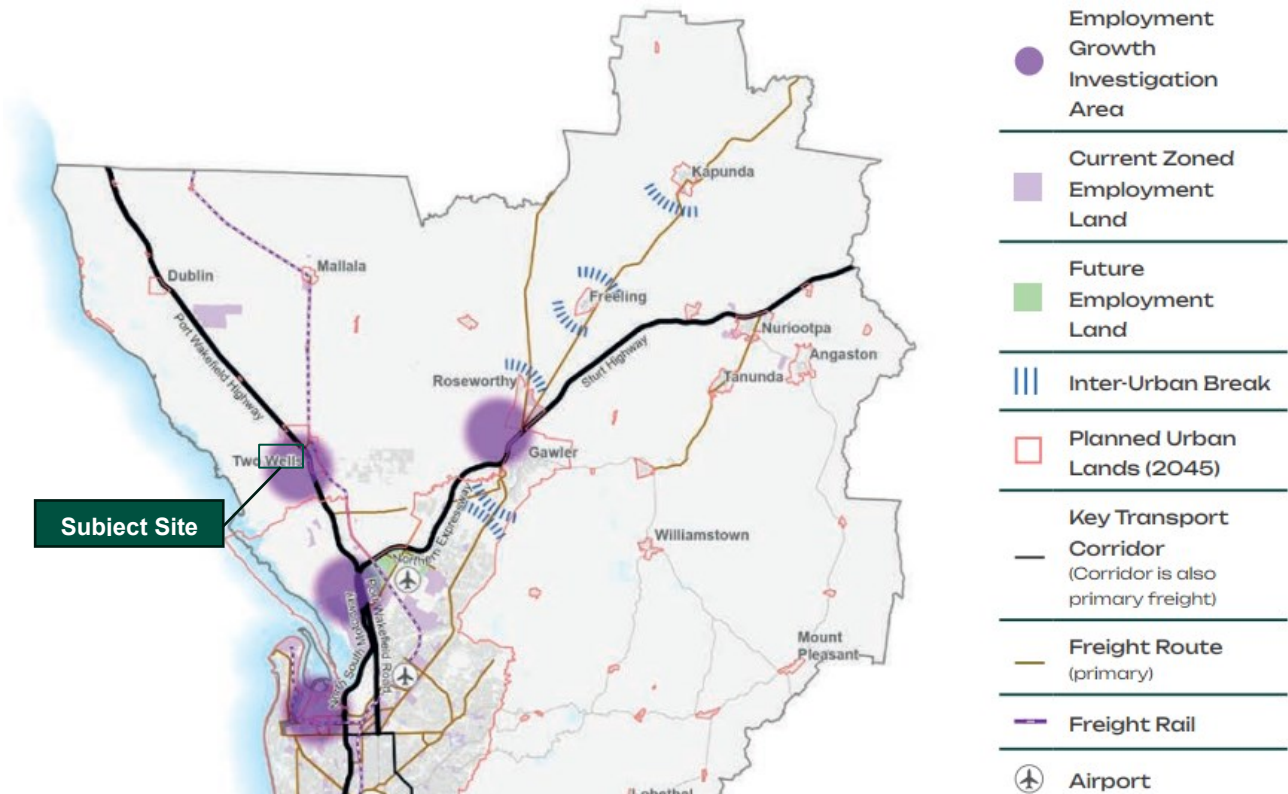


Figure 3.3: Proposed 'Employment Growth Investigation Areas', north of Adelaide CBD
(Source: Greater Adelaide Regional Plan Discussion Paper, August 2023)

4. CONSULTATION WITH ADELAIDE PLAINS COUNCIL

Karytinós has engaged in early high level discussions with senior administration of the Adelaide Plains Council on the 10th August 2023 to discuss the opportunity for this land to be identified as a future urban growth area for both residential development and supporting employment lands.

On the 26th September 2023 Karytinós also attended a briefing session with the elected representatives of the Adelaide Plains Council seeking in-principle support for the intent of the Two Wells West opportunity, subject to the outcome of further required detailed investigations.

5. A VISION FOR TWO WELLS WEST

As part of early consultation with Adelaide Plains Council and in preparation of this submission, a Concept Urban Framework Plan for Two Wells West has been developed. **Figure 5.1** and **Appendix 1** provide a summary of the Concept Urban Framework Plan.

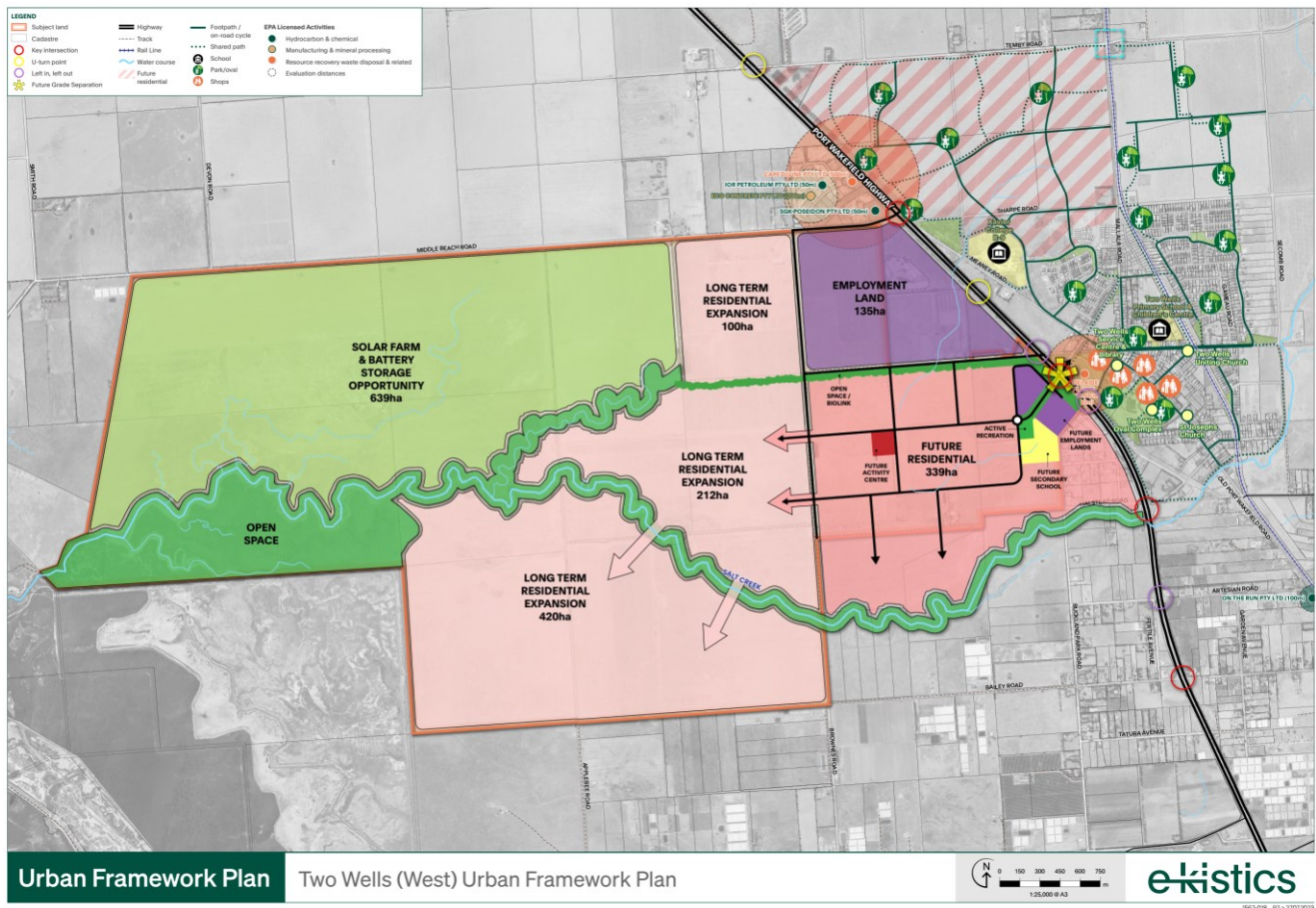


Figure 5.1: Concept Urban Framework Plan – Two Wells West

As part of the preparation of the Concept Urban Framework Plan, five (5) key project drivers were identified:

1. Unlocking strategic employment land adjacent a key freight route.
2. Creating a new township growth front for Two Wells within immediate proximity to the town centre.
3. Bridging the link across Port Wakefield Highway & improving connectivity.
4. Unlock a new Solar Farm and Battery Storage opportunity.
5. Protecting Conservation Land and enhancing connection through bio-links.

The Concept Urban Framework Plan would deliver approx. 9,000 dwellings for a future 22,500 residents, across an average allotment size of between 600m² to 700m², applying an average density of 15 dwellings per hectare (nett). Other key features of the plan include:

- A range of housing opportunities and allotment sizes, with higher densities focused around activity centres and open space;
- Future Secondary School (or R-12, supporting projected population growth in Two Wells West);
- Active Recreation precinct to service a nearby school and capture growth of Two Wells West land;
 - Employment Lands for a range of diverse business and services, including opportunity for bulky goods outlets adjacent to Port Wakefield Highway to service the population and provide a buffer to protect sensitive residential development from noise and air emissions from Port Wakefield Road);
 - New suburban and local activity centres, providing convenience services and retail, functioning as a secondary centres to the Two Wells township which will remain a central Regional Centre for the Two Wells township and beyond;
 - Protection of Salt Creek environs through creation of large bio-link, connecting Two Wells to the open space and conservation area adjacent Middle Beach; and
 - Renewable Energy (Solar Farm and Battery Storage) opportunity.

5.1. Capacity for Compact Township Growth

Assuming a conservative yield of 15 dwellings per hectare (net developable area) across both the 'Future Residential' area and 'Long Term Expansion' area, the subject land could yield in the order of approximately 9,000 dwellings.

This represents a substantial residential development opportunity, and would amount to an additional 49% supply to the 18,200 projected supply in the 'Outer North Area of Greater Adelaide'.

Based on a limited 'desktop' assessment of the site (and setting aside the current EFPA boundary), we are of the opinion that the site would have limited constraints that would prevent future development achieving this dwelling yield given:

- Consolidated Land Ownership – the subject site is not fragmented and is under single ownership and control of the Karytinis Family which will assist with coordinated and sequential development of the land as well as reduce complexity in the negotiation and coordination of infrastructure delivery for the future growth area;
- Corridor Location – the subject land has direct access to Port Wakefield Highway, which is identified as the ‘North-Western Spine’ of the GARP Discussion Paper;
 - Proximity – the eastern portion of the site is within a walkable distance to the existing and expanded Two Wells town centre, as well as recreation precinct. This proximity provides a significant advantage over other growth areas of Two Wells;
 - Topography – The land is largely flat, with the opportunity for a careful engineered solution to balance cut and fill with the delivery of required stormwater infrastructure;
 - Native vegetation – the site has been predominantly cleared of vegetation and is being used for low intensity grazing and cropping. Mature vegetation is confined to the perimeter of the subject land and within the Salt Creek corridor, where it could likely be retained and accommodated in any future development of the subject land;
 - Flooding – the current Hazards (Flooding) and Hazards (Flooding – General) Overlay areas over the subject site could be suitably mitigated through an engineered response in a future development of the subject site, including possible incorporation of any required stormwater conveyance and detention in open space reserves and corridors; and
 - Heritage – There are no State or local Heritage Places on the subject land;
 - Cultural Heritage – As a large, consolidated land holding, the opportunity exists to undertake a ‘Cultural Heritage Management Plan’ to assess the potential impact of a proposed activity on Aboriginal cultural heritage and It outlines measures to be taken before, during and after an activity in order to manage and protect Aboriginal cultural heritage in the activity area.

Notwithstanding a 100m buffer has been applied to Salt Creek within the Concept Urban Framework Plan, which will function to protect this important natural corridor. It is noted that creeks, around other waterbodies, and within raised elevations of the land, are typically likely to comprise areas of cultural sensitivity.

5.2. Connecting People & Industry

The subject land abuts key roads – including the Port Wakefield Highway, Middle Beach Road, Halstead Road, Buckland Park Road and Bailey Road West.

Port Wakefield Highway is a dual-lane arterial road which connects Adelaide through to the Yorke Peninsula and the far north of South Australia and interstate connections. Based on high level preliminary analysis (and subject to more detailed investigations) we understand that Port Wakefield Highway would have capacity to accommodate future anticipated traffic movements generated by future development of the land.

In identifying the primary connection between the existing Two Wells town centre and the subject land (across Port Wakefield Highway), an analysis of the broader movement network has been undertaken in consultation with the Adelaide Plains Council. Ideally, a direct connection would link the subject land into the expanding Two Wells Town Centre via Mallala Road. A transport link and connection of this nature would closely align with Council's establishment of a 'three town service model', between Two Wells, Mallala and Dublin. Further, it would be expected that in any instance, with the anticipated growth of Two Wells this existing intersection is likely to trigger the need to undergo a future upgrade and/or relocation of the existing freight route (which currently utilises Mallala Road through to Port Wakefield Highway).

The early stages of development could initially be delivered without the need for substantial traffic control measures at the Mallala Road / Port Wakefield Highway intersection. However as Two Wells West expands, additional transport interventions will likely be required.

Karytinios recognise and understand that it would be necessary to enter into an infrastructure agreement to ensure the provision of necessary services and infrastructure to serve the future community, which would likely occur prior to the authorisation of a Code Amendment to rezone the land. This infrastructure agreement could be in the form of a Deed registered against the land via a Land Management Agreement (LMA) or alternatively a 'Basic Infrastructure Scheme' managed by an independent scheme coordinator pursuant to Part 13 (Infrastructure Frameworks) of the Planning Development and Infrastructure Act 2016.

Through an appropriate infrastructure funding mechanism, the staged delivery of necessary infrastructure will coincide with continued logical growth of the Two Wells West precinct.

5.3. Self-Sustaining Growth & Employment

Karytinios has received interest to develop part of the subject land for the purposes of a potential Solar Farm and Battery Storage facility. The Concept Urban Framework Plan has identified several land parcels in the western portion of the land for this purpose, which would allow for significant facility (100MW+) to be developed, whilst providing appropriate buffers to residential areas and protecting significant areas for conservation. This would equate to the generation of electricity for greater than 30,000 dwellings (Source: Climate Council – Australia), more than three (3) times the number of dwellings identified across both the 'Future Residential' area and 'Long Term Expansion' area within the GARP Discussion Paper.

It is noted that whilst the subject land proposes a modest supply of strategic employment lands as indicated in the Concept Urban Framework Plan in **Figure 5.1** above, the land is also within close proximity and well-connected to the established Edinburgh Parks further south which the GARP Discussion Paper identifies as a strategic strength of the 'North-Western spine'. Future residents of Two Wells West would benefit from access to existing and new employment lands and being able to 'Live Locally', a key strategy identified under the GARP Discussion Paper 'by locating housing, jobs and services closer together so people can meet most of their daily needs within a comfortable walk, ride or public transport journey from home'.

'Two Wells West' represents a significant opportunity to sensibly expand the Two Wells township in a manner that creates urban development supported by jobs and services, with the Concept Urban Framework Plan identifying a suitable location

for new employment lands in a manner which provides separation between industry and residential areas. In addition, there is the intent to develop an eastern portion of the subject land for the purposes of large format retail (bulky goods, akin to a homemaker centre type development), which represents a new opportunity for this region.

5.4. Protection of Primary Production & Conservation Areas

Identified by green shading in **Figure 5-2** the subject land sits beyond the boundaries of the 'Primary Production Priority Area' (PPPA). Developed by Primary Industries of South Australia (PIRSA), PPPA's have been identified in response to Planning Strategy directives including the 30 Year Plan for Greater Adelaide to identify 'areas of primary production significance' (Government of South Australia, 2010, P. 106). PPPA's have been identified with reference to a variety of factors including "land capability, industry investment and land use, access to water, climatic considerations (including anticipated climate change) and any local conditions that give rural land special significance for primary production" (Location SA, 2010).

Importantly, the PPPA boundary follows the alignment of Middle Beach Road, with all land to the south of Middle Beach Road situated beyond the PPPA boundary.



Figure 5.2: Primary Production Priority Area (Source: Location SA)

The Concept Urban Framework Plan in **Figure 5.1** above also identifies protection of the western Conservation area, whilst maintaining key bio-link corridors connection Two Wells through the Middle Beach. This would not only protect this important habitat, but also enhance opportunities for passive recreation for two Wells and Middle Beach residents, in addition to providing nature tourism opportunities.

5.5. Propensity for Development

The land is under the single ownership and control of The Karytinis Family who strongly support:

- The identification of the subject land as a future urban growth area;
- The removal of the Environment & Food Production Area (EFPA) from the subject land;
- The immediate initiation of a Code Amendment to rezone the land and facilitate future employment land, urban development and housing.

The subject site therefore has a strong propensity for future development and delivery to market should it be identified as a future urban growth area to contribute to the supply of affordable housing across Greater Adelaide.

The Karytinis Family have a long history of investing within the South Australia, creating long term jobs and opportunities for a range of South Australians. In particular, The Karytinis Family have owned and operated Olympic Industries since 1969, and is a significant employer for South Australia across its 4 sites. The Karytinis Family have also indicated interest in potential relocation (and expansion) of its Para Hills West operation to the subject site. This has the potential to bring in at least 200 jobs (FTE) to Two Wells.

6. CONCLUSION

This submission is provided to assist the State Planning Commission's upcoming review of the Regional Plan for Greater Adelaide.

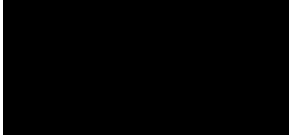
We are of the opinion that the subject land represents a significant opportunity for the future expansion of the Two Wells Township. This view is reinforced through the Greater Adelaide Regional Plan Discussion Paper, which has designated the subject land as a Growth Investigation Area (for both residential and employment growth) to meet the future land supply needs for Greater Adelaide.

Based on preliminary 'desktop' analysis the subject site does not have any likely constraints that would prevent or inhibit future urban development and the land is not fragmented and is under the control of a single entity to enable a coordinated approach and delivery of future housing in a master planned community.

Karytinis therefore request that the subject site is identified as a 'future urban growth' area in the next iteration of the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years) for both residential and employment lands.

Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

Yours sincerely,



Ryan Moyle

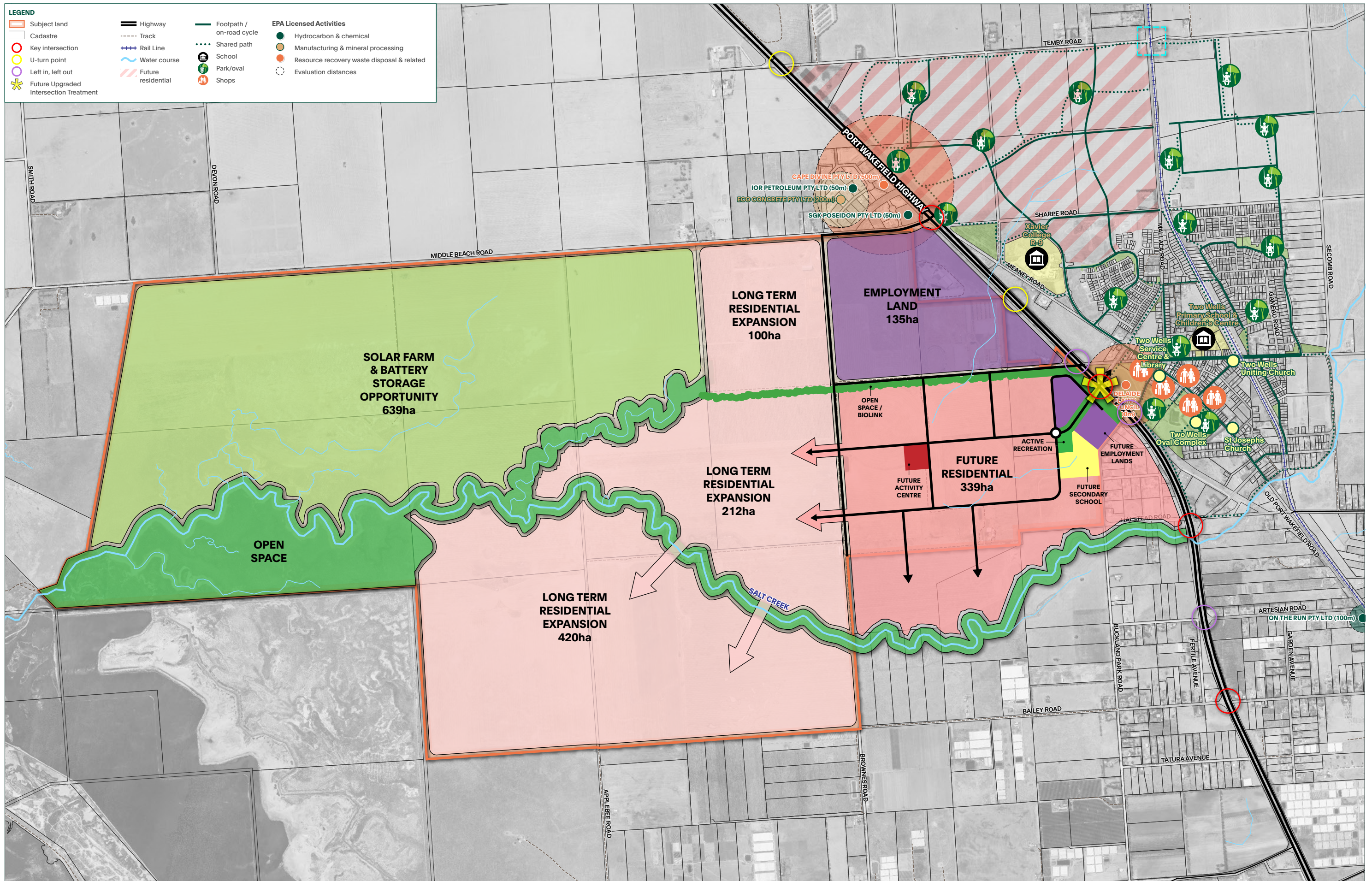
Senior Associate

CC: Mr John Karytinis c/o The Karytinis Family



APPENDIX 1

Concept Urban Framework Plan



DTI:PlanSA Submissions

From: Grazio Maiorano [REDACTED]
Sent: Monday, 6 November 2023 9:51 AM
To: DTI:PlanSA Submissions
Cc: Sarah Lowe
Subject: Submission to the GARP - Discussion Paper - Windamere Park
Attachments: 231103 V2 GARP Submission.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

On behalf of Theodoor De Lyster please find attached our submission to the GARPO Discussion Paper.

Kind regards



Grazio Maiorano
Director
[REDACTED]

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Adelaide SA 5000
(Access via Symonds Place)

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Kaurna Country

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6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Windamere Park

Thank you for the opportunity to comment on the Greater Adelaide Regional Plan (GARP) Discussion Paper. We welcome the opportunity to contribute to such an important plan for South Australia.

URPS is writing on behalf of Mr Theodoor De Lyster (Proponent) who is the owner of Windamere Park at Buckland Park. Windamere Park is an accredited disability services provider with the National Disability Insurance Scheme (NDIS), currently offering a range of educational and training opportunities for participants, alongside limited supported independent living accommodation and overnight accommodation.

Mr Lyster would like to see the GARP recognise this land as having potential to support much needed Specialist Disability Accommodation (SDA) in connection with the existing facilities, and in an integrated manner with new conventional residential land uses.

Background

The Minister has approved the initiation of the Windamere Park Code Amendment which seeks to amend the Planning and Design Code to enable the expansion of services currently offered. More particularly, the Code Amendment seeks to establish a policy environment that enables Specialist Disability Accommodation (SDA) integrated with new conventional housing.

The Affected Area is currently zoned Rural Horticulture and is subject to the dedicated Windamere Park Subzone (see Figure 1). This subzone has been prepared in recognition of the Affected Areas use for disability support services. Despite the dedicated Subzone, the corresponding application of the Limited Land Division Overlay

and a 10-hectare Minimum Site Area Technical and Numeric Variation (TNV) leads to the division of land being a restricted form of development.

As such, the Code Amendment proposes to remove the Limited Land Division Overlay and amend the Minimum Site Area TNV to enable the cohesive development of SDA housing integrated with conventional dwellings in a manner that recognises the need to retain the Windamere Park services.

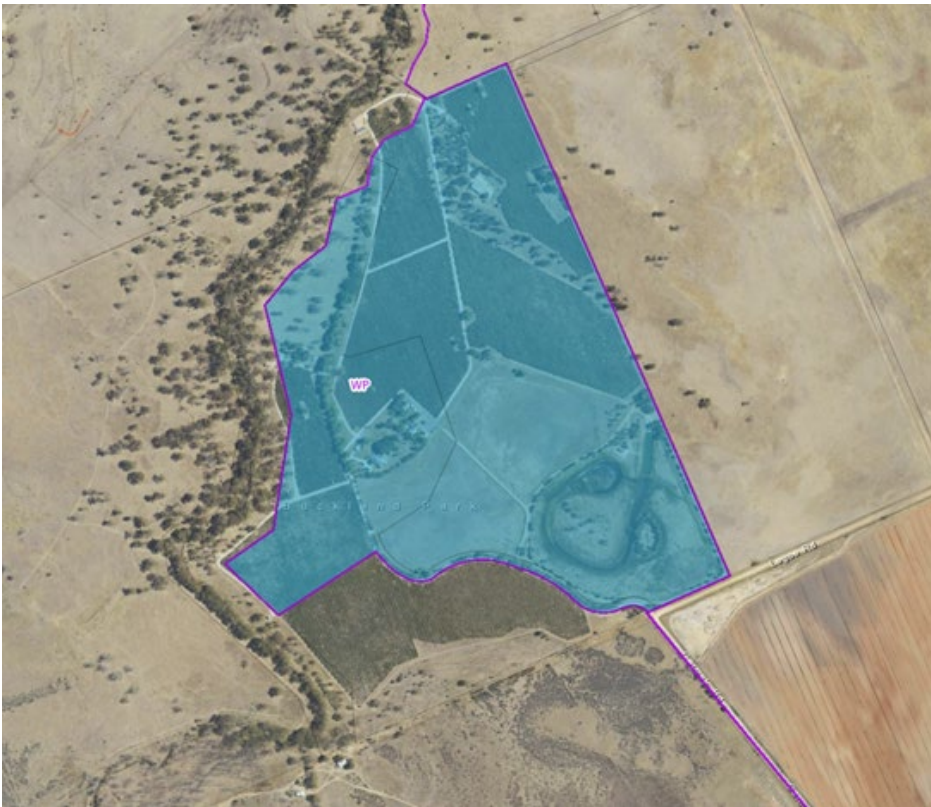


Figure 1: Blue shaded area represents the Windamere Subzone.

Extracts from the GARP Discussion Paper

The GARP will identify growth over a 15-30 year period by investigating and guiding where residential land will go. The land is in proximity to both existing identified development fronts and growth investigation areas associated with the Riverlea development.

It is acknowledged that Riverlea Park will be Adelaide's largest master planned community, with 12,000 new homes to be built over the next 20 years. The master plan includes facilities that will service the community, including an employment centre, shopping village, schools and recreational facilities. With this level of investment underway, the opportunity to provide SDA housing where services and infrastructure are under development, has significant long-term community benefit.

Having regard to Figure 9 (page 126) and Figure 11 (page 141) it is unclear if the land has been identified as a future urban area.

Justification

As reinforced in the Discussion Paper the land falls along the north-western spine investigation area which capitalises on:

- Recent significant investment in road infrastructure
- Planned infrastructure investment
- Land that is of lower primary production value
- Planned development in the locality.

The characteristics of the land and its locality interfacing an existing identified development front strategically aligns it with the objectives of the Discussion Paper.

The Proponent is eager to develop the land for residential purposes with the inclusion of Specialist Disability Accommodation (SDA) and related commercial and community land uses as sought by the proposed zoning.

Alignment with the GARP Discussion Paper

Projections show that Greater Adelaide's population could grow by up to 670,000 people over the next 30 years.¹ In order to provide appropriate housing and employment for these additional 670,000 people, targeted greenfield and infill development needs to occur. Significant investigations have been undertaken to identify investigation areas for this development.

The Discussion Paper has highlighted the importance of connected communities. With a significant area of Master Planned Neighbourhood zoned land to the east the land it is logical to expand this zoning over the Proponent's land. The development proposed by the proponent is of significant community value and will enhance the proposed development within the locality.

¹ Greater Adelaide Regional Plan Discussion Paper
https://plan.sa.gov.au/_data/assets/pdf_file/0009/1259208/Greater-Adelaide-Regional-Plan-Discussion-Paper.pdf

Desired outcome

We encourage the Commission to identify the land for future residential purposes that can accommodate the Windermere Park facilities on its existing footprint to the west of the land.

Conclusion

We are supportive of the intent of the Discussion Paper and the identified growth areas. With the Proponent's land located near the identified north-western spine and directly abutting a Master Plan Neighbourhood Zone to the east we request the Commission identify the land as a future urban area.

We are eager to continue to work with the Commission, government agencies and Council to ensure the development of this land and the delivery of residential objectives.

Yours sincerely



Sarah Lowe
Consultant

DTI:PlanSA Submissions

From: Zoe Garnaut [REDACTED]
Sent: Monday, 6 November 2023 9:09 AM
To: DTI:PlanSA Submissions
Cc: [REDACTED]; Taylor Conry-Hall; Sonia Mercorella
Subject: RE: Submission on the Greater Adelaide Regional Plan Discussion Paper- Opportunity for future Urban Corridor and Urban Activity Centre Regeneration - 160-168 O.G. Road, Felixstow
Attachments: 1636-002_20231106_Uniting Communities Felixstow_GARP Submission_Fv2.pdf

You don't often get email from [REDACTED] [Learn why this is important](#)

Dera Sir/Madam,

Further to my email below, our clients have added some additional comments in the revised attached submission. Can you please use the attached as the submission rather than the earlier version.

Kind regards,

Zoë Garnaut
Senior Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000

[REDACTED]
www.ekistics.com.au

Please note, my office hours are **Tuesdays, Wednesdays** and **Thursdays**



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

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From: Zoe Garnaut
Sent: Sunday, November 5, 2023 7:48 PM
To: plansasubmissions@sa.gov.au
Cc: [REDACTED] Taylor Conry-Hall [REDACTED] Sonia Mercorella
Subject: Submission on the Greater Adelaide Regional Plan Discussion Paper- Opportunity for future Urban Corridor and Urban Activity Centre Regeneration - 160-168 O.G. Road, Felixstow

Dear Sir/Madam,

On behalf of our clients Uniting Communities, Ekistics are pleased to provide the attached submission which supports the proposed inclusion of land at 160-168 O.G. Road, Felixstow as a future Urban Corridor or Urban Activity Centre rejuvenation area in the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper').

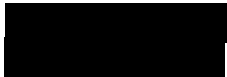
Ekistics would welcome the opportunity to further discuss the inclusion of this significant land holding within a future Urban Corridor or Urban Activity Centre regeneration area, in particular the opportunity to rezone the site and to also increase the maximum building height in order to facilitate a redevelopment of the site into an integrated and diverse community, that caters for all ages and 'walks of life' and caters for an innovative mix of residential, community partnerships and holistic health care and education services that aim to enrich life.

Kind regards,

Zoë Garnaut
Senior Associate

ekistics

Level 3, 431 King William Street, Adelaide SA 5000



www.ekistics.com.au

Please note, my office hours are **Tuesdays, Wednesdays** and **Thursdays**



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

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6 November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
ADELAIDE SA 5001

Attn: Growth Management Team
By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: SUBMISSION ON THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER- OPPORTUNITY FOR FUTURE URBAN CORRIDOR AND URBAN ACTIVITY CENTRE REJUVENATION -UNITING COMMUNITIES 'ALDERSGATE' FACILITY- 160-168 O.G. ROAD, FELIXSTOW

1. EXECUTIVE SUMMARY

This submission supports the proposed inclusion of land at 160-168 O.G. Road, Felixstow as a future Urban Activity Centre regeneration area in the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper'). Alternatively, it seeks inclusion of O.G Road as a future Urban Corridor for infill development.

The site provides an opportunity for immediate rezoning and an increase in the maximum building height Technical Numeric Variation (TNV) in order to unlock its development potential for a future community focused intergenerational development that provides for an innovative mix of residential, community partnerships and holistic health care and education land uses that aim to enrich life. The site is ideally positioned immediately opposite the Council owned Payneham Library and Community Centre as well as the Payneham Memorial Swimming Centre on the southern side of Turner Street. To the south-east of the site is Patterson Reserve and Recreation Precinct, also owned by the City of Norwood, Payneham and St Peters (all of which are currently earmarked by Council for significant redevelopment).

The site is serviced by two (2) public transport bus routes and is located within 550m (or 7 minute walk) to Klemzig O-Bahn bus interchange offering convenient access to fixed high-frequency transport.

2. INTRODUCTION

We act for Uniting Communities (UC) who are an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year. UC value diversity and are committed to providing respectful, accessible services. Uniting Communities strive to help people live the best lives they can.

UC own and operate the existing 'Aldersgate Residential Aged Care Facility' which includes the State Heritage listed 'Forsyth House,' a former residential house utilised as administration and training / meeting offices. UC are currently in the process of undertaking a master planning process over the site with the objective of establishing an integrated and diverse community that caters for all ages and 'walks of life'. The redevelopment will likely include an innovative mix of residential, community partnerships and holistic health care and education services that aim to enrich life. The Master Plan will be guided by the place pillars to heal/unify/grow.

Located at 160-168 O. G. Road, Felixstow, the site is located within the City of Norwood, Payneham and St Peters ['City of NPSP'] and is bound by O.G. Road to its west, Turner Street to the South and Aldersgate Drive to its east. The Third Creek culvert also adjoins the site at its south-eastern end.

The subject site has been identified as a 'Neighbourhood and Centre Regeneration' investigation area within the Greater Adelaide Regional Plan (GARP) Discussion Paper (the 'Discussion Paper').

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Regional Plan for Greater Adelaide, and for seeking input to inform the strategic direction on how and where Greater Adelaide should grow.

This submission, prepared on behalf of Uniting Communities, is to provide support to identify cadastre parcels that should form part of the 'Neighbourhood and Centre Regeneration Area' along O.G. Road, or alternatively to support the site's inclusion along O.G. Road as a 'Urban Corridor Investigation Area.' As set out in the submission below, the subject land is highly suitable for centre regeneration and ideally placed as an Urban Corridor Zone, capable of supporting urban uplift including taller built form in proximity to fixed high frequency public transport and complementary community and recreational facilities including the City of NPSP Library, the Payneham Memorial Swimming Centre and Patterson Reserve.

3. THE SUBJECT LAND

3.1. The Subject Site

The subject site is located at 160-168 O. G. Road, Felixstow (refer to **Figure 3.1** on the following page) and is formally described as:

- Certificate of Title Volume 5828 Folio 286 (Allotment 502 in Deposited Plan 51736); and
- Certificate of Title Volume 5644 Folio 479 (Pieces 1002 and 1003 in Deposited Plan 51824)

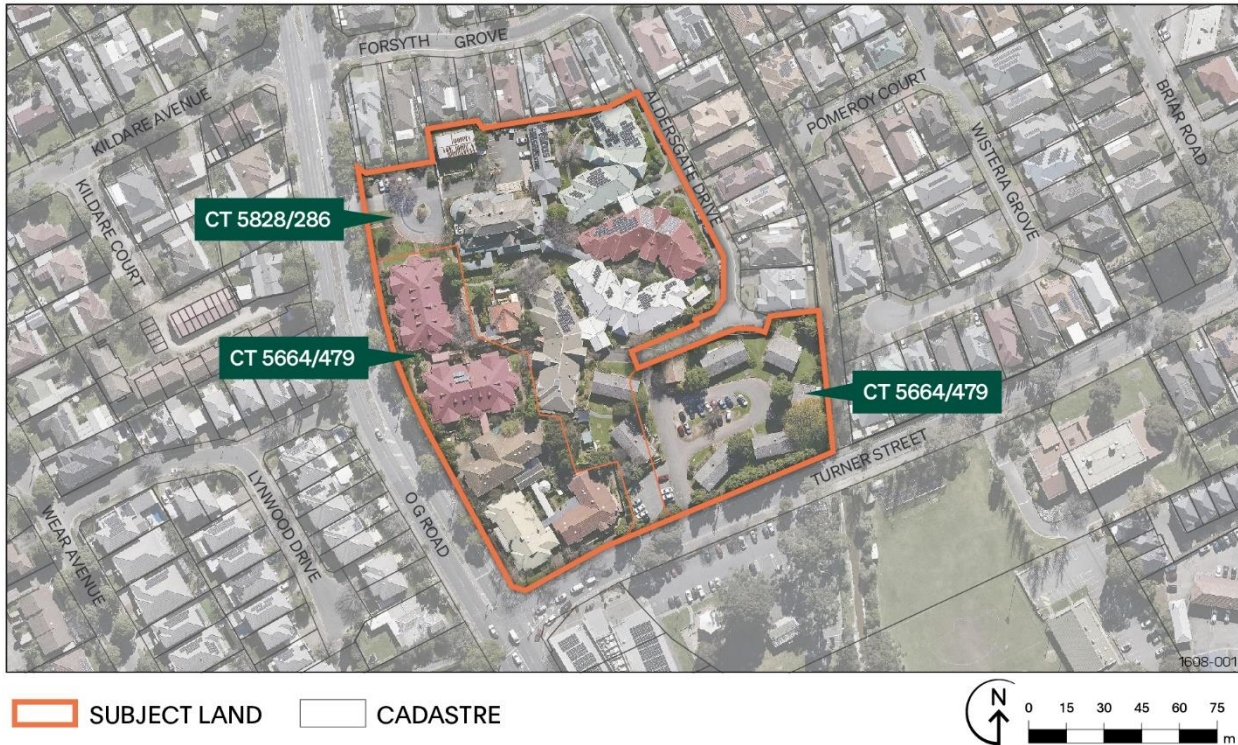


Figure 3-1 Subject Site

The site currently contains a series of predominantly single storey buildings, many of which are interconnected with covered verandahs that together comprise the ‘Aldersgate Residential Aged Care’ facility. The built form age and typology varies over the site as it has been expanded over time. The site contains the State Heritage Place ‘Forsyth House’ (SHP 12684), a former dwelling currently utilised for training and commercial offices, situated central to the site.

The site has an approximate area of 2.3 hectares and has a primary street frontage to O.G. Road of 176m, a secondary street frontage to Turner Street of approx. 136m and a frontage to Aldersgate Drive of approx. 133m. O.G. Road is a State Maintained Road under the care and control of the Commissioner of Highways via the Department for Infrastructure and Transport (DIT). Turner Street and Aldersgate Drive are local roads under the care and control of the City of NPSP. There is a signalised intersection at the corner of O.G. Road and Turner Street.

3.2. The Locality

The subject site is located opposite the Council owned Payneham Library and Community Centre as well as the Payneham Memorial Swimming Centre on the southern side of Turner Street. To the south-east of the site is Patterson Reserve and Recreation Precinct, also owned by the City of Norwood, Payneham and St Peters (refer to **Figure 3.2** on the following page).

It is noted that the City of NPSP is in the process of implementing upgrades to the Payneham Memorial Swimming Centre which forms part of the broader Master Plan for the precinct (refer to **Figure 3.3**).

Located to the immediate east of the site is the Third Creek drainage reserve which currently comprises an open concrete channel which directs the creek into Linear Park to the north.

The River Torrens/Karrawirra Parri Linear Park Trail is located further to the north of the site, which encompasses Payneham Lions Pioneer Park, the Riverside Playground, Drage Reserve and the Klemzig O-Bahn interchange (on the northern side of the River).

To the south- east of the site, located off Briar Road, is the Felixstow Primary School, Good Start Early Learning Centre and the Briar's Special Early Learning Centre along with the Department for Education, child development regional office.

The broader locality to the north, east and west of the subject site generally comprises single and two-storey (low rise) residential dwellings at low to medium density. There is growing evidence in the locality of medium density infill developments in the form of group dwellings or residential flat buildings.

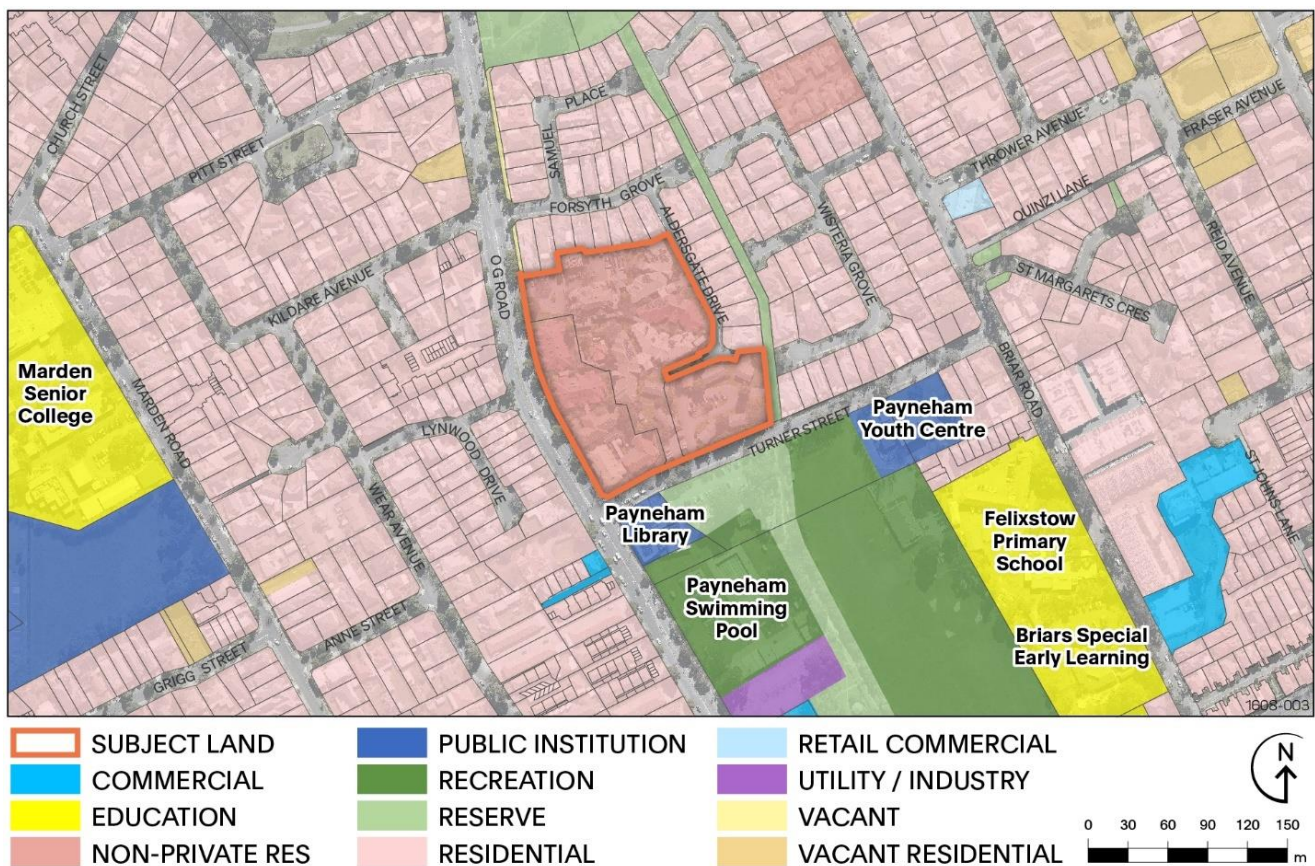


Figure 3-2 Surrounding Land Uses

The following community, educational, recreational and religious facility are also situated within the wider locality:

- Marden Senior College

- Marden Sporting Complex (basketball centre)
- Azzurri Sports Club (soccer);
- Adelaide Australia Temple (church);
- Marden Shopping Centre including large format supermarket and specialty retailers;
- St Aidan's Anglican Church; and
- Various commercial business along both Payneham Road and Portrush Roads.

3.2.1. City of NPSP Patterson Reserve Master Plan

The City of NPSP has developed a Master Plan in conjunction with T.C.L for the Patterson Reserve Community and Recreation Precinct which seeks to draw together several community assets within the area including the sports fields, play facilities, the Library, Youth Centre and the Payneham Memorial Swimming Centre (refer to **Figure 3.3** on the following page).

This Master Plan acknowledges the Payneham Memorial Swimming Centre forms part of a larger recreational and community precinct that can be upgraded to cater for increased population within the area and envisages the following:

- Redevelopment of the Payneham Memorial Swimming Centre (currently in progress) including:
 - New two-storey sports and leisure centre;
 - New 8 lane, 25m lap pool and learn to swim area (semi-enclosed);
 - Upgrade of existing 8-lane 50m outdoor pool;
 - New water play area/water activities;
 - Retention of the strong parklike quality allowing good sightlines;
 - Greater presence along OG Road;
- Relocation and upgrade of the Baseball and Lacrosse clubrooms into a new central axis and new park entrance including café and decking across the Third Creek culvert;
- New sports club change facilities and storage building near Turner Street;
- Relocated memorial garden and a new playground (replacing the current playground adjacent to the library) along a central axial pathway;
- Enhance Third Creek Corridor and connection to local path networks, including potential widening and naturalisation of waterway;
- New 250+ space multilevel carpark servicing the reserve, sports fields, swim centre and retaining the open-air carparking off OG Road; and
- New off-street parking connecting to existing library accessed off Turner Street.



Figure 3-3 NPSP/TCL Patterson Reserve Master Plan

The subject site presents an opportunity to capitalise on its strategic location, opposite regional level community facilities and open space, on a State Maintained Road serviced by public transport and within a 7 minute walk (550m) of the Klemzig O-Bahn interchange and Karrawirra Parri/River Torrens Linear Park.

3.3. Existing Zone and Policy Framework

The subject site is located within the '**General Neighbourhood Zone**' of the Planning and Design Code (Version 2023.15 dated 26 October 2023), which seeks "low-rise, low and medium-density housing that supports a range of needs and lifestyles located within easy reach of services and facilities. Employment and community service uses contribute to making the neighbourhood a convenient place to live without compromising residential amenity."

Land on the opposite side of Turner Street is located within the **Housing Diversity Neighbourhood Zone**, and the land on eastern side of Pattersons Reserve (comprising the Felixstow Primary School) located with the **Community Facilities Zone**.

Figure 3.5 below identifies the current zoning that applies to the subject site and surrounding locality and illustrates an opportunity to rezone the subject site and potentially surrounding locality to better align with the intent of the Urban Communities Master Plan objectives and City of NPSP Master Plan for a vibrant intergenerational community precinct.

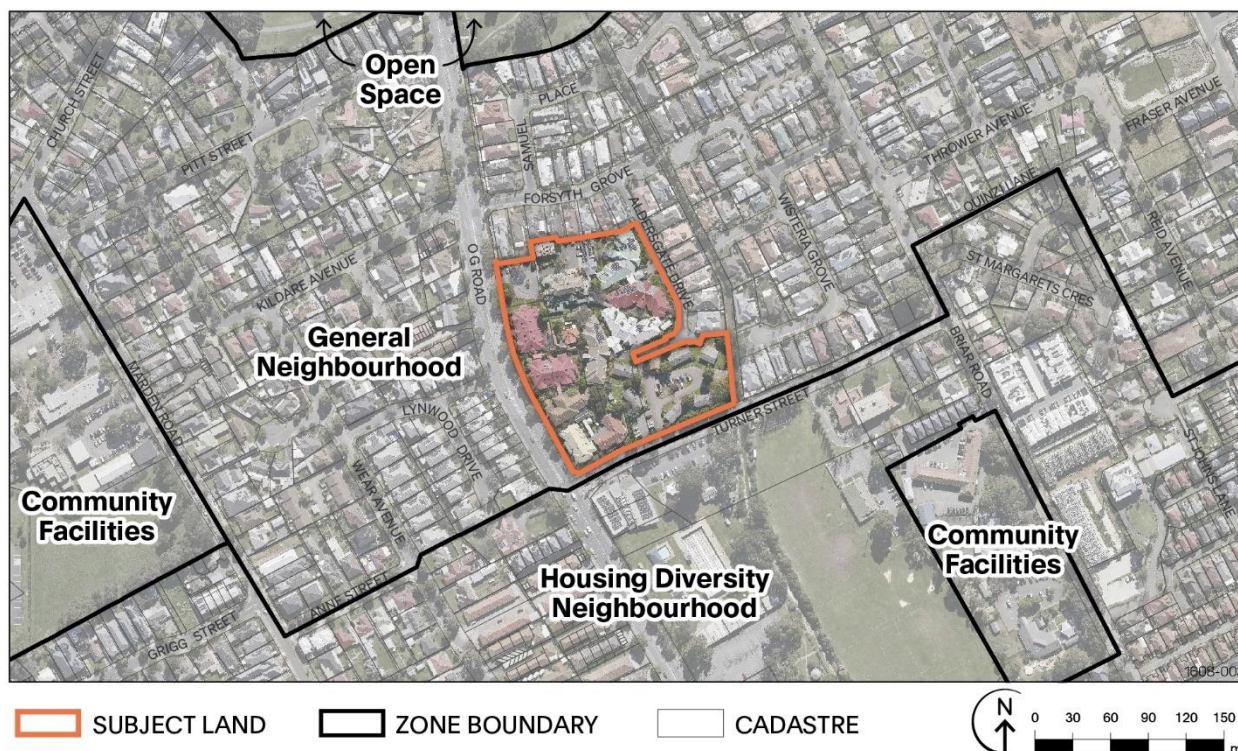


Figure 3-4 Site and Locality Zoning Plan

Whilst the existing 'General Neighbourhood Zone' does envisage complementary non-residential land uses which support an active, convenient walkable neighbourhood such as a community facility, child care facility, consulting room and small scale shop, it is envisaged at a low-rise¹ (1-2 building level) low to medium density² built form.

As a large, amalgamated land holding, adjacent to significant community facilities, there is an opportunity to rezone the land to facilitate higher density, taller built form to maximise use of the significant regional level facilities and create an active and vibrant community focused mixed use precinct. **Figure 3.5** on the following page illustrates how taller built form could be achieved on the site whilst maintaining appropriate interface with existing residential properties within the 'General Neighbourhood Zone' to the immediate north, east and west.

3.4. 30 Year Plan for Greater Adelaide

The strategic direction contained within the '30 Year Plan for Greater Adelaide' [the '30 Year Plan'] and in particular the 'Transit corridors, growth areas and activity centres' targets seek to "support jobs and services in accessible locations and provide more housing options close to public transport. The city, mixed-use activity centres and transit corridors will be the focus of renewed activity and will be supported by rejuvenated neighbourhoods linked by integrated public transport systems and cycling networks."

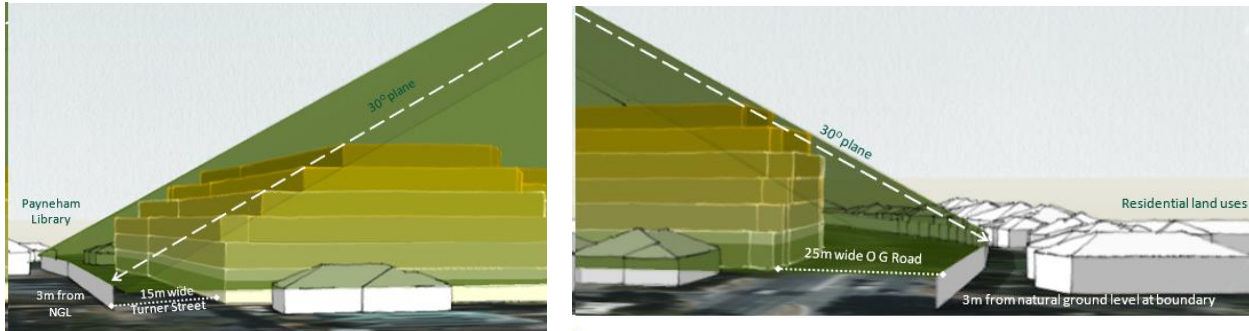
The dwelling density guidelines outlined within the 30 Year Plan seeks that "walking catchments to fixed line transit stations should generally be within 800m" and that "gross densities within these catchments should look to increase in these locations.. with net densities in the medium to high density range." Accordingly, Action 2 of the 30 Year Plan seeks that "local area planning link development to support infrastructure investment and public realm improvements" with Action 4 seeking to "rezone strategic sites to unlock infill growth opportunity that directly support public transport infrastructure investment."

[our emphasis]

Consistent with the 30 Year Plan, the subject site is located well within 800m of fixed line transit stations (being approx. 550m to the Klemzig O-Bahn bus interchange) and is further serviced by two bus routes immediately adjacent the site on both O.G. Road and Turner Street. Combined with the site's location opposite Patterson Reserve and the City of NPSP Library and Payneham Memorial Swimming Centre, it is ideally placed for medium to high density strategic infill.

¹ Part 8 of the Code defines 'Low-rise' in relation to development to mean up to and including 2 building levels.

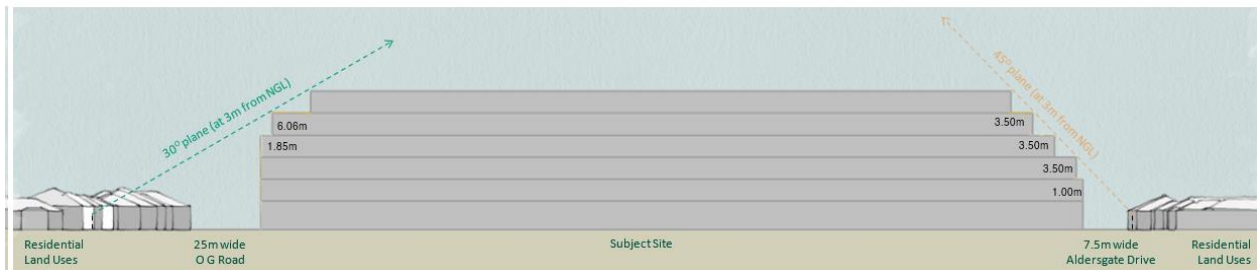
² Part 8 of the Code defines 'Low net residential density to mean less than 35 dwellings per hectare and medium net residential density to mean 35 to 70 dwellings per hectare.



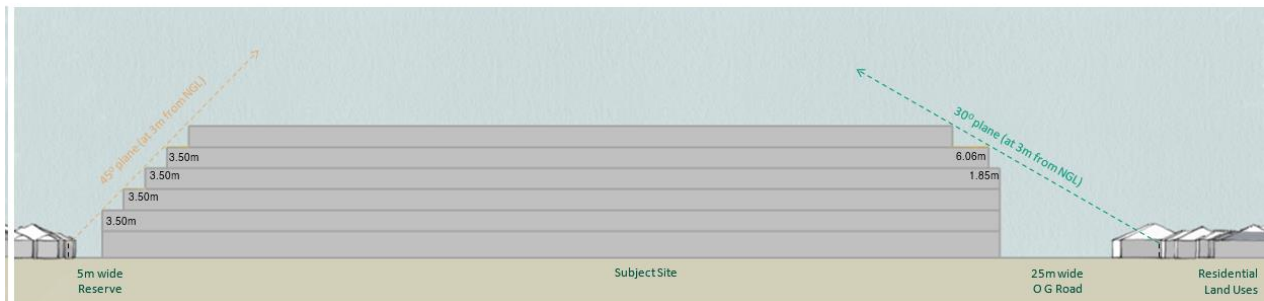
Potentail building envelope across Turner Street and O.G. Road.



North-South cross section facing west across subject site.



East-West cross section facing north across subject site.



East-West cross section facing south across subject site.

Figure 3-5 Building Diagram Example – 6 building levels with respective 30 degree and 45 degree interface

4. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

According to the Greater Adelaide Regional Plan (GARP) Discussion Paper, current population projections demonstrate that by 2051 we need to plan for an additional 670,000 people in Greater Adelaide, with required housing supply of 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes beyond the existing 200,000 new homes already planned for. The Paper identifies that an additional 100,000 homes is the equivalent of 10 Concordia or Dry Creek developments and that under this growth scenario, we will run out of land for future residential development within Greater Adelaide within 30 years if an ongoing rezoning program is not developed.

The Discussion Paper has identified that future growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision.

As identified in the Paper, urban infill can deliver significant public benefits when appropriately located and designed. Urban infill refers to “new housing constructed on vacant and underutilised allotments, interspersed amongst older, existing houses in established neighbourhoods”. Urban Infill has recognised economic and productivity benefits as it increases population close to higher concentrations of jobs and services, near amenities and public transport options, as well as providing a diversity of housing types as well as affordability for different life stages near existing support networks.

4.1. Urban Activity Centres & Neighbourhood Regeneration Opportunity

The Discussion Paper outlines that Urban Activity Centres “generally provide a full range of services like shopping, entertainment, health, community and recreation. This provides an opportunity to further develop higher-density housing that will capitalise on the proximity to these services and support their economic viability.”

The Discussion Paper identifies that some of the benefits of regenerating Urban Activity Centres include leveraging existing significant infrastructure investment already in place including public transport, education, medical facilities, and variety of shops and services. The Paper identifies that land uses in and around some centres could be better zoned to provide a range of housing options near these services and facilities.

The subject site has been identified within Figure 11 (also illustrated in **Figure 4.1** on the following page) of the Discussion Paper as being within or on the fringe of an Urban Neighbourhood and Centre Regeneration investigation area.

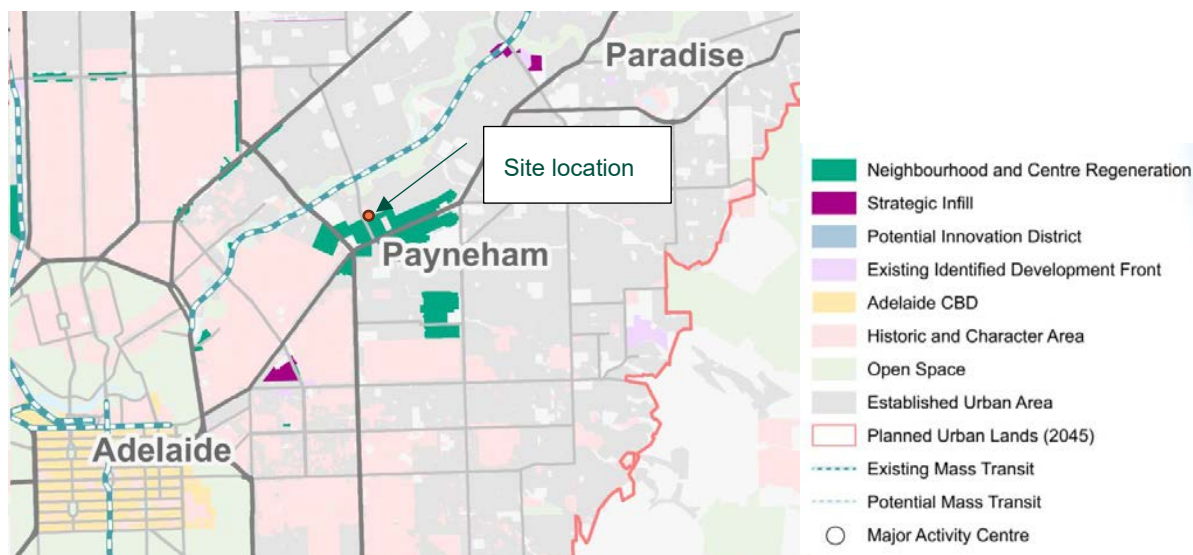


Figure 4-1 GARP Neighbourhood and Centre Regeneration Investigation Area (page 141)

Table 4.1 provides an analysis of the challenges identified in the Discussion Paper for ‘Urban Centre Regeneration’ and the suitability of the subject land to address each of the challenges identified.

Table 4-1 Urban Activity Centre Regeneration Analysis

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
A renewed focus on areas in and around urban centres will need better implementation and coordination measures and consideration of current infrastructure capacity	<p>The site is currently well serviced by public transport on both the O.G Road and Turner Street frontages. The site is also located within 550m (7 minute walk) of the Klemzig O-Bahn bus interchange which provides fixed rapid transport to both the Adelaide CBD and Tea Tree Plaza. The Karrawirra Parri/River Torren Linear Park is within 500m (approx. 5 minute walk) north of the subject site.</p> <p>The site adjoins Pattersons Reserve, the City of NPSP Library and the Payneham Memorial Swimming Centre across Turner Street. As outlined above, these facilities are earmarked for significant capital investment and redevelopment in the near future.</p> <p>The site is also serviced by electricity, water, sewer, gas and telecommunication services. In the context of the site's location within an established urban area, the site is expected to have adequate infrastructure capacity and/or augmentation capability.</p>

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
Sensitive integration with adjacent established housing is essential	<p>As identified in Figure 3.4 above, the closest established housing located within the ‘General Neighbourhood Zone’ is adjoining the site to the immediate north. Residential properties are also located on the opposite side of Aldersgate Drive to the east and over the Third Creek culvert. The western side of O.G. Road similarly contains residential properties that back onto O.G. Road within either the ‘General Neighbourhood Zone’ or the ‘Housing Diversity Neighbourhood Zone.’</p> <p>Figure 3.5 illustrates how a medium rise (3 to 6 building levels) building envelope can be accommodated with due consideration to established low rise residential development. This diagram provides a gradual transition in height from the northern boundary towards the south- eastern corner. It is noted however that this diagram has not taken into consideration the State Heritage Place that would require further curtilage and setbacks. This would be taking into consideration as part of any future development master planning exercise.</p> <p>Given the orientation and configuration of the site, any overshadowing impacts from future taller built form would be predominantly over O.G. Road and Turner Street. Further interface considerations particularly in relation to visual appearance of built form are able to be appropriately managed due to the large, consolidated nature of the site and would be considered during detailed design in a future development application.</p>
Larger sites improve design outcomes, but fragmented ownership is a challenge to site assembly.	<p>As outlined above, the subject site represents a large consolidated land holding ideally located adjacent regional recreational and community facilities and within easy walking distance of the Linear Park trail and high-frequency O-Bahn busway interchange. Uniting Communities will retain ownership of all development and all future property holdings over the subject which eliminates future fragmentation risk.</p> <p>The regeneration of this strategically important land holding through increased density and building height would complement the work earmarked for the precinct by the City of NPSP and contribute to the activation and vibrance of the community focused precinct.</p>

4.2. Urban Corridor Opportunity

Strategic infill opportunities in the form of urban corridor development are recognised in the Discussion Paper as continuing to play an important role in providing additional growth options.

The Urban Corridor Zone was introduced to the planning system in 2013 as a key outcome of 30-Year Plan for Greater Adelaide investigations, initially along transit corridors close to the CBD, but later (in 2017) expanding to other major corridors. Urban corridor infill development typically occurs in a 'strip' formation, predominantly between main arterial roads and established low density areas, in inner and middle ring suburbs. Examples of Urban Corridor zones within the inner north-eastern suburbs include portions of Lower-North East Road in Campbelltown (north of the 'Glynde Corner'- 4 building levels), section of Payneham Road, Payneham to the south of the site opposite Pattersons Reserve on the southern side of Payneham Road (former Schweppes factory at 382 Payneham Road- 5 building levels) and various sections along both Magill Road, Norwood (6 to 10 building levels) and Magill Road, Magill (4 building levels) and The Parade in Norwood (4 to 7 building levels).

Urban corridor development presents significant opportunities for mixed use development, offering both a diversity of housing options in highly sought after established areas, along with commercial development that promote walkable, vibrant precincts. Focussing high density mixed use development along transit corridors eases the pressure on established suburban streets, preserving their distinctive residential and often historical character.

The Discussion Paper anticipates two types of corridor development, depending on the sensitivity of adjacent land uses:

1. Corridor development next to established residential land uses, particularly heritage and character areas will be of a lower scale and intensity to manage the interface with these neighbourhoods.
2. Corridor development with fewer sensitive interface issues to manage will seek to maximise the scale and intensity of buildings and uses.

Discussion Paper Figure 10 – Proposed areas of investigation: Strategic infill and corridor growth identifies the main roads within Adelaide Metropolitan Area that the Commission proposes to review, with a view to establishing the next iteration of urban corridor rezoning.

Figure 10 in the Discussion Paper (extract in **Figure 4.2** on the following page) identifies Payneham Road as one of the urban corridors highlighted for investigation, however does not identify O.G Road as a corridor investigation area. It is considered that O.G Road should be considered as a corridor investigation area for the following reasons:

- O.G. Road connects and provides walking/cycling linkages to the Klemzig O-Bahn bus Interchange;
- It is a State Maintained Road that provides a vehicle linkage between Payneham Road and North East Road;
- It provides walking/cycling linkages to the Karrawirra Park/ River Torrens Linear Park trail;
- It contains at least two (2) bus routes that feed into the O-Bahn busway; and

- O.G. Road already contains a mixture of residential and commercial land uses that leverage the passing vehicle trade and proximity to services and recreational assets.

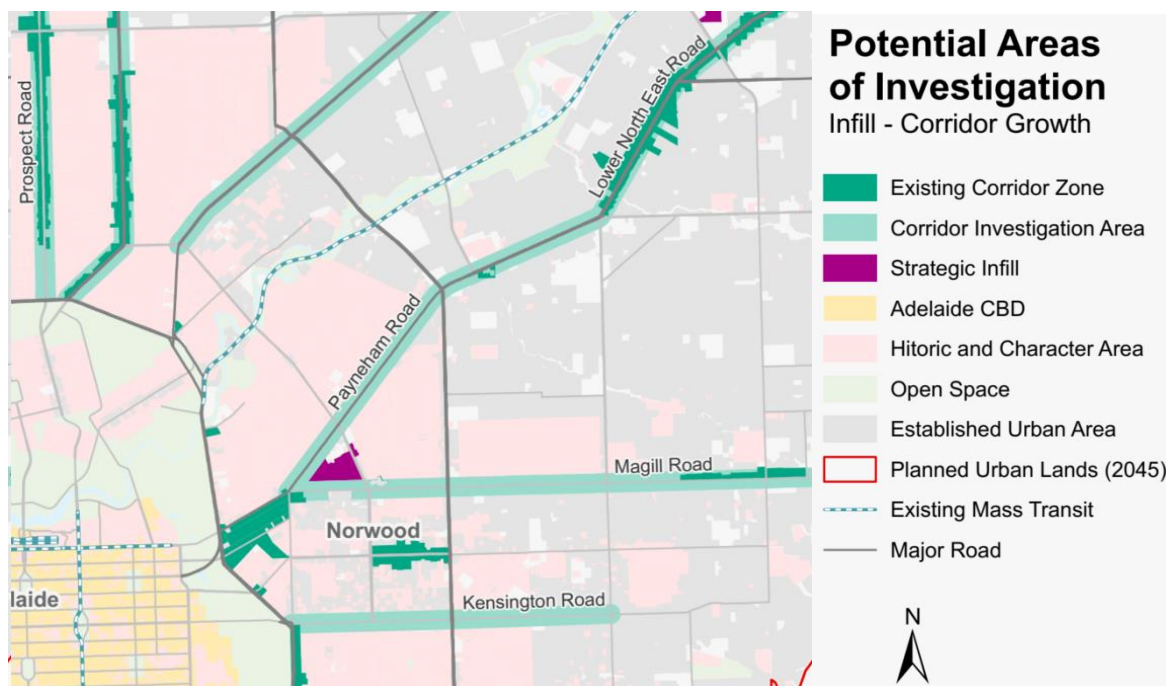


Figure 4-2 GARP Corridor Growth Investigation Areas (page 136)

We note the following challenges identified in the Discussion Paper for ‘urban corridor development’ and the suitability of the subject land to address each of the challenges identified in **Table 4.2** below:

Table 4-2 - Urban Corridor Investigation Analysis

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
Integration of higher density corridor developments with adjacent established housing, land division patterns and allotment depths.	<p>The land division pattern along main roads within existing Urban Corridor Zones is a consistent challenge in developing land, as the predominantly single allotment depth creates difficulties with commercial viability, and interface management with lower scale established development.</p> <p>The subject land represents an amalgamated site with additional depth than a typical single allotment and is also predominately separated from adjoining residential development via the existing street network and Third Creek culvert.</p> <p>The subject site is therefore ideally suited as a strategic infill site capable of supporting additional height and density, enabling sensitive interfaces to be</p>

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
	appropriately managed (Figure 3.5 above provides an illustration of how interface in building height could be appropriately managed with the adjoining residential properties).
Larger sites improve design outcomes, but fragmented ownership can impede site assembly.	As identified in Figure 3.1 , the Uniting Communities own a large consolidated land parcel of approx. 2.3 hectares in size, capable of accommodating taller buildings and increased density whilst still appropriately manage interfaces with sensitive land uses to the immediate north and east.
Some corridors are impacted by heritage and character overlays or are adjacent heritage and character suburbs. Any development of these corridors needs to be sensitively integrated into the surrounding urban form, and the design and interface carefully managed.	<p>Whilst the subject land contains the State Heritage Place 'Forsyth House', given its large consolidated nature, appropriate curtilage to the heritage place, along with important views and vistas can be maintained (subject to detailed design as part of a future development application), whilst still increasing building height and density (likely to the southern and eastern portions of the site).</p> <p>There are no other Heritage Places within the immediate locality nor is the site encumbered by an Historic Area Overlay.</p>
Ensuring enough local employment land to service residents	<p>The site currently contains the 'Aldersgate Residential Aged Care Facility.' As outlined above, Uniting Communities have embarked on a master planning exercise of the site with the objective to achieve an integrated and diverse community that caters for all ages and 'walks of life'. Land uses anticipated as part of the master plan include:</p> <ul style="list-style-type: none"> • Aged Care, Child Care facilities, Education and/or training facilities (utilising an intergenerational model of care where older and younger generations capitalise on the demonstrated advantages of intergenerational interaction); • Build-to-Rent (BTR) town houses catering for a mix of demographics and household types; • Affordable/social townhouses and apartments; • Medical and allied health services, with a focus on holistic healthcare services (desired to be located near the O.G. Road frontage); • Offices & consulting rooms;

Challenge (Identified in the Discussion Paper)	Response (Land Suitability)
	<ul style="list-style-type: none"> • Retail (including a café and local food and beverage offerings to service the new and existing surrounding community); • Communal indoor/outdoor spaces including community gardens and cooking facilities; • Community partnership-spaces (such as art exhibition spaces); and • Connection to the environment- interface with Third Creek which runs along the eastern edge of the site. <p>The intended mixed-use development outcome will accommodate of range of employment generating uses, supported by medium density residential development.. Redevelopment of the site in line with the above land uses would contribute to an active and vibrant precinct and provide employment options both for new residents to the site and those who currently reside in close proximity.</p> <p>As outlined above, bus services operate along both O.G. Road and Turner street with the fixed high frequency O-Bahn bus services within approx. 550m or approx. 7 minutes walk from the site.</p>
Some former industrial sites pose the risk of environmental contamination	<p>The current and historical use of the land as a residential aged care facility (a sensitive land use) suggests a low risk of site contamination.</p> <p>Suitable investigations will be undertaken, should the land be proposed to be rezoned for a more sensitive land use at ground level than currently exist to ensure the site is suitable.</p>

5. REDEVELOPMENT SUITABILITY

Based on initial investigations (and subject to further future detailed analysis), we anticipate the site can accommodate medium rise built form of 3 to 6 building levels, scaling up towards the O.G. Road/Turner Street intersection. We anticipate the site could also accommodate a medium to high net residential density (35 to over 70 dw/ha) with potential ground level allied health, early learning and retail / commercial uses, orientated towards the Turner Street/ O.G. Road frontages for activation and to achieve a mixed use development outcome, with appropriate transitions to residential development to the north and east.

Consideration of the interface with the adjoining residential development (likely to remain in the 'General Neighbourhood Zone') will be an important part of the future rezoning process. We would anticipate a lower building height at the interface of the site, assisted by the retention of 'Forsyth House' State Heritage Place, the Third Creek culvert and Aldersgate Drive that forms a natural separation and screen, particularly to the north and east.

Redevelopment of the site will need to carefully consider factors such as the location and setting of the State Heritage Place, existing site constraints (such as the creek, stormwater management, topography and access form State Maintained Road), future aspirations for Pattersons Reserve, the City of NPSP Library and Payneham Memorial Swimming Centre, the O.G. Road corridor and the contextual location of the site as well as adjoining land uses and zoning.

Based on a limited assessment of the site, we are of the opinion that the site is highly conducive to urban uplift and to support a mixed-use development outcome for the reasons expressed below:

- Transport – As mentioned, the subject site is extremely well located to accommodate urban infill, being located close to the Klemzig O-Bahn bus interchange and serviced by two bus routes with stops immediately adjoining the site on O. G Road and Turner Street;
- Topography – The land is relatively flat and should not topographically constrain future development options;
- Flooding – Only limited portions of the site within proximity of the Third Creek culvert are affected by the current Hazards (Flooding) Overlays. Any areas of potential flooding or overland flow could be suitably mitigated through an engineered response in a future development of the site including possible detention in open space areas; and
- Heritage – The 'Forsyth House' State Heritage Place is an integral and distinctive element of the site, a distinctive feature that could be capitalised on further through innovative design and adaptive reuse. The redevelopment of the site may lend further investment and ongoing maintenance for the Heritage Place.

The subject land is owned and run by Uniting Communities, who strongly support:

- The identification of the subject land as a future urban growth area in the form of an urban centres regeneration area;
- The identification of O.G. Road as a future urban growth area in the form of an urban corridor, supporting strategic infill development; and

- The initiation of a Code Amendment to rezone the land to facilitate mixed use development and an uplift in building height and density.

Uniting Communities have commenced early investigations to inform a Master Plan and future land rezoning. . Discussions have also been initiated with the City of NPSP staff in relation to the Master Plan and a potential Code Amendment.

The subject site therefore has a strong propensity for future development and delivery to market should the site be identified as an urban centre regeneration area, or alternatively O.G Road be identified as an Urban Corridor to contribute to the supply of housing across Greater Adelaide.

6. CONCLUSION

This submission is provided to assist the State Planning Commission's upcoming review of the Greater Adelaide Regional Plan, in response to the Discussion Paper issued by the State Planning Commission.

We are of the opinion that the subject site provides a logical opportunity for urban infill growth within an urban activity regeneration area, as identified in the Greater Adelaide Regional Plan Discussion Paper.

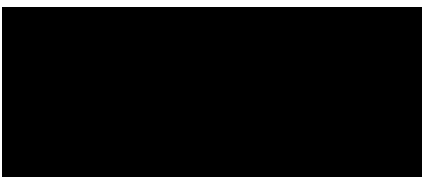
Further, we are of the opinion that the O.G. Road corridor, incorporating the subject land, provides a further opportunity for urban infill growth within close proximity (approx. 550m) to the Klemzig O-Bahn bus interchange (a fixed high frequency public transport node) as well as close proximity to the Karrawirra Parri/ River Torrens Linear Park walking and cycling path that connects to the CBD and beyond.

Based on preliminary analysis the subject site does not present significant constraints that would prevent future urban development and the land is not fragmented and is under the control of a single entity to enable a coordinated approach and delivery of a future mixed use development.

Uniting Communities therefore requests that the subject site is identified as part of the Felixstow urban centre regeneration area, or alternatively that O. G. Road is considered as an Urban Growth Corridor for strategic infill development in the next iteration of the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years).

Please do not hesitate to contact the undersigned on [REDACTED] should you require any additional information in support of this submission and request.

Yours Sincerely,



Zoë Garnaut

Senior Associate

DTI:PlanSA Submissions

From: Grazio Maiorano [REDACTED]
Sent: Monday, 6 November 2023 10:40 AM
To: DTI:PlanSA Submissions
Cc: Enzo Raschella; Nick Pseudos; Sarah Lowe
Subject: GARPO Discussion Paper Submission - Riverlea Park
Attachments: 230913 V4 Submission on GARP.pdf

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On behalf of the V. S. Raschella Nominees Pty Ltd, please find attached a submission to the GARP Discussion Paper.

Regards



Grazio Maiorano
Director
[REDACTED]

2 / 27 Halifax Street
Adelaide SA 5000
(Access via Symonds Place)

08 8333 7999

Kaurna Country

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6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper - Buckland and Carmelo Road, Riverlea Park

We are acting on behalf of V. S. Raschella Nominees Pty Ltd (Raschella Group) regarding their land located directly south of Riverlea Estate.

The Discussion Paper has been released for community and industry comment. The Paper provides a vision for the Greater Adelaide region to 2051. We commend the State Planning Commission for the work undertaken in preparing this Paper.

Affected Land

Our client owns the following three parcels of land in Riverlea Park (affected land):

- Lot 4 Carmelo Road, Riverlea Park (CT5916/62)
- Lot 5 Carmelo Road, Riverlea Park (CT5916/63)

As shown in Figure 1 the affected land is currently zoned Rural Horticulture and is directly south of Master Planned Neighbourhood Zoned land in Riverlea Park. Development of the Master Planned Neighbourhood land to the north is well underway.

The affected land is bound by the Suburban Activity Centre Zone to the east and Strategic Employment to the west. To the south, the affected land is bound by land zoned Recreation. The affected land is located within the Greater Adelaide planning region.

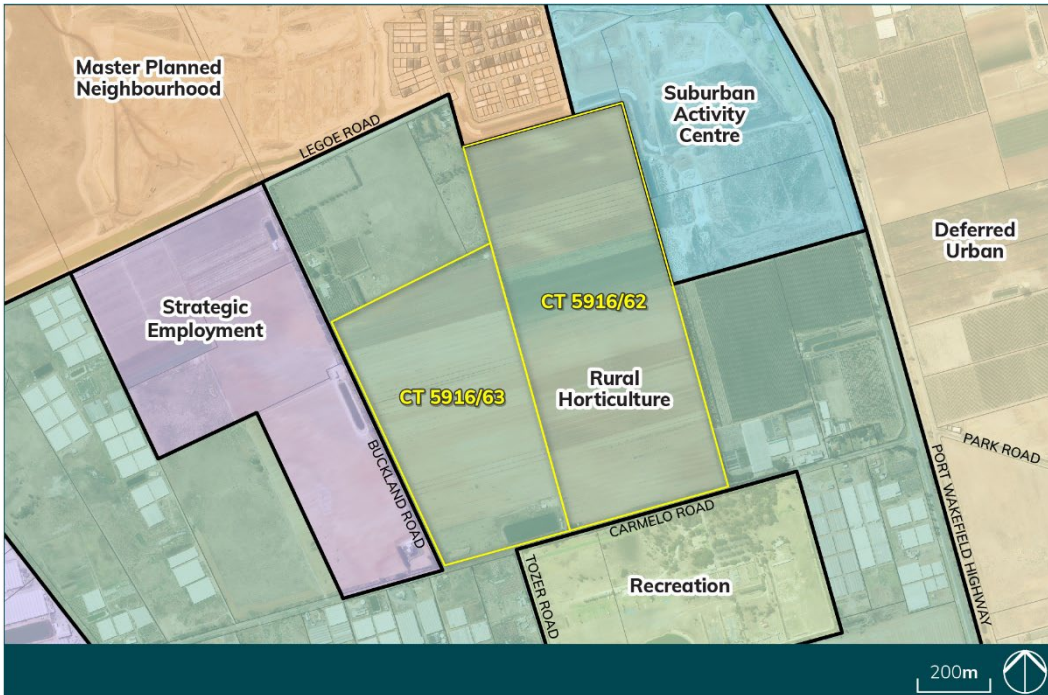


Figure 1 Affected land and surrounding zoning

Extracts from the GARP Discussion Paper

In Figure 2 we have overlaid the existing zoning map on to the Discussion Paper's proposed areas of investigation (refer to map on page 141 of the Discussion Paper). We note that this map is conceptual in nature and does not follow cadastral boundaries. The map however is useful in highlighting the intent of future investigations. As shown in Figure 2 the affected land is within an existing identified development front.

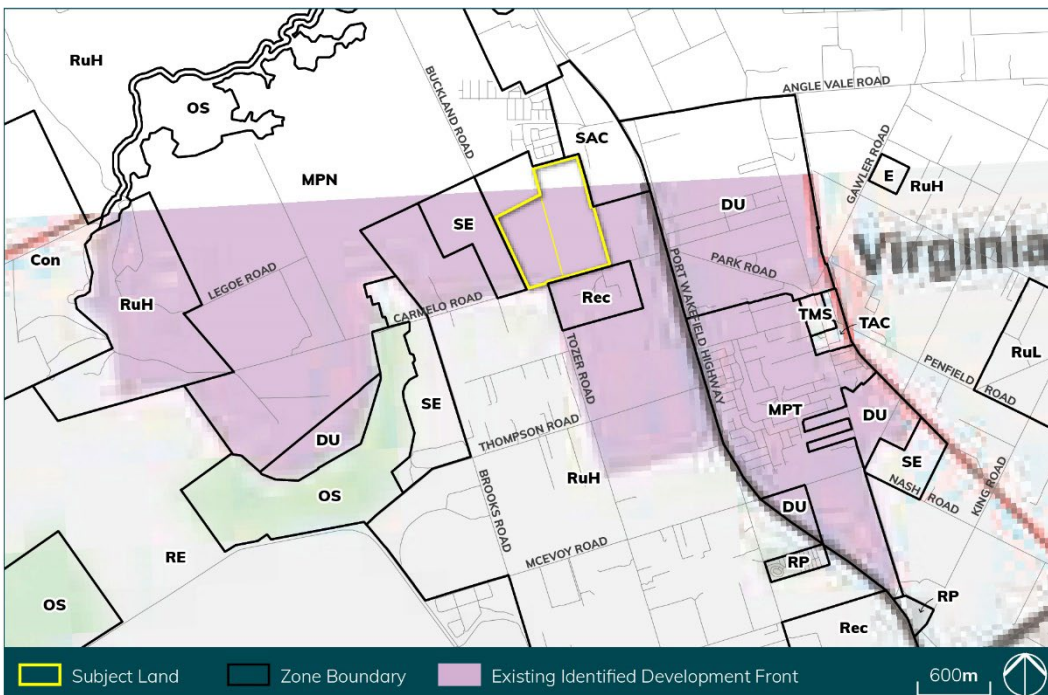


Figure 2 Discussion Paper areas of investigation and current zoning

Desired outcome

We encourage the Commission to retain the affected land within the identified development area and look forward to this position being reflected in the draft GARP.

We are conscious that the provision of infrastructure is an important component of the rezoning and development of the affected land and surrounding land. We have had preliminary discussions with Playford Council and neighbouring landowner representatives to understand infrastructure issues.

Justification

Riverlea was identified for growth in the 30 Year Plan for Greater Adelaide. Significant rezoning occurred in this area to support a master planned greenfield development. Construction is now underway.

Riverlea will be Adelaide's largest master planned community with 12,000 new homes to be built over the next 20 years. The master plan includes services, community infrastructure, employment centre, school, recreational and retail facilities.

Much of the affected land interfaces with residential, employment and recreational zoning and therefore the continued rural occupation of the affected land is not consistent or desirable to the development intent. Furthermore, the affected land provides little long-term value for primary production.

A key focus of the Discussion Paper is providing homes and jobs in the right locations. This means ensuring communities are well connected to services and infrastructure, leading to reduced living costs and increased community wellbeing. The affected land is clearly aligned to this overarching objective and therefore it is logical to consider expansion of the Master Planned Neighbourhood Zone.

Alignment with the GARP Discussion Paper

Projections show that Greater Adelaide's population could grow by up to 670,000 people over the next 30 years.¹ In order to provide appropriate housing and employment for these additional 670,000 people, targeted greenfield and infill development needs to occur. Significant investigations have been undertaken to identify investigation areas for these purposes.

The Discussion Paper has drawn out discussion points specific to greenfield development. These discussion points should be considered in relation to our client's land in Riverlea Park.

Regarding living locally, our client's land shares boundaries with the Suburban Activity Centre Zone, Master Planned Neighbourhood Zone, Recreation Zone and Strategic Employment Zone. The intent of these four zones ensures a combination of dwellings, retail outlets, community services, recreation areas and employment opportunities. Expanding a neighbourhood type zone over the affected land would be consistent with

¹ Greater Adelaide Regional Plan Discussion Paper
https://plan.sa.gov.au/_data/assets/pdf_file/0009/1259208/Greater-Adelaide-Regional-Plan-Discussion-Paper.pdf

the surrounding context and positively contribute to achieving the objectives of living locally.

The affected land offers the opportunity to enhance and expand a strategically planned greenfield development. The development of the adjacent land to the north and the intended land uses established by the zoning framework for the land to the east and west ensures the affected land represents a logical expansion of the Master Planned Neighbourhood Zone. The affected land can positively contribute to the delivery of residential development in the short to medium term and the additional 300,000 homes required over the next 30 years.

GARP Discussion Paper Priorities and Direction in relation to State Planning Policies (SPPs)

We have reviewed the priorities and directions of the Discussion Paper in relation to greater housing choice and the relevant SPP's specific to our client's development intent. The table below summarises this information.

SPP	Ideas for the GARP in relation to greater housing choice in the right places	Alignment to our Submission
SPP 1 – Integrated Planning	<ul style="list-style-type: none"> • Prioritise and sequence the release of zoned land based on transparency of costs to the community of different forms of housing (including upfront development and ongoing living costs) • Prioritise strategic infill sites that are generally more economic to service than general infill • Focus infill supply in locations where there is capacity in infrastructure networks • Build on existing infrastructure capacity in townships where local councils identify growth opportunities. 	<p>The affected land aligns with an identified development front investigation area. It therefore considers the sequencing of development and the associated delivery of infrastructure.</p> <p>There is strategic alignment with investigations already undertaken and the logical expansion of a neighbourhood area.</p>
SPP 2 – Design Quality	<ul style="list-style-type: none"> • Identify areas that will undergo changes to urban form and consider the complementary infrastructure and public realm improvements required. 	<p>Any future development will be design focused and need to align with the Planning and Design Code.</p> <p>As a master planned development,</p>

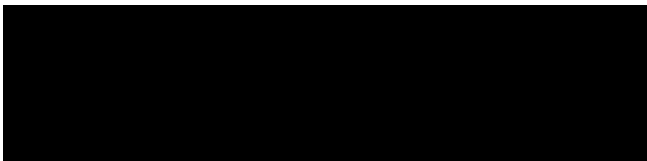
SPP	Ideas for the GARP in relation to greater housing choice in the right places	Alignment to our Submission
		transforming a rural area to an urban area design detail can be well considered.

Conclusion

We are supportive of the intent of the discussion paper and the identified growth areas. With the affected land located on the north-western spine and identified within an existing development front we look forward to seeing the continued development of Riverlea Park.

We are eager to continue to work with the Commission, government agencies and Council to ensure the development of this land and the delivery of housing objectives through a Code Amendment.

Yours sincerely



Sarah Lowe
Consultant

DTI:PlanSA Submissions

From: Matthew Norden [REDACTED]
Sent: Friday, 3 November 2023 1:08 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper
Attachments: Submission Greater Adelaide Regional Plan Discussion Paper - Vicinity Centres 231103.pdf

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Good afternoon,

Please find attached a submission from Vicinity Centres.

Thanks and regards
Matt

Matthew Norden

Manager, Property Investment Analytics
Vicinity Centres

National Office
Tower One, Level 4, 1341 Dandenong Road
Chadstone Victoria 3148



[REDACTED]
[REDACTED]

CONNECT WITH US  

Acknowledgement of Country

As an owner and manager of community hubs right across Australia, Vicinity acknowledges the Traditional Custodians of the lands on which we operate and we pay our respect to Elders past and present.

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3 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001

Via email: plansasubmissions@sa.gov.au

To whom it may concern,

Submission – Greater Adelaide Regional Plan Discussion Paper

We write to provide a representation to the abovementioned Discussion Paper for the Greater Adelaide Regional Plan ('GARP').

The Discussion Paper identifies land surrounding four Vicinity-owned shopping centres as '*Proposed areas of investigation for Neighbourhood and Centre Regeneration*'. This includes Colonnades Shopping Centre, Castle Plaza, Kurralta Central and Elizabeth City Centre.

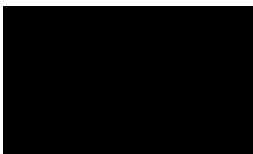
The Discussion Paper identifies land proximate to two Vicinity-owned shopping centres as '*Strategic Infill*'. This includes Castle Plaza and Elizabeth City Centre.

We support the intention of the GARP to identify land and long-term infrastructure needs to support sustainable growth within Greater Adelaide for the next 15 to 30 year period, to accommodate the projected population growth.

The proposal to focus new growth in locations with existing services and facilities is further supported and we understand the GARP will consider land capacity to accommodate growth in strategic locations, including activity centres.

Vicinity would like to be part of further discussions regarding the GARP and reserve the right to be involved further in the process. We would also like to reserve the right to expand on our representation once any additional information becomes available.

Thank you for the opportunity to make a representation on this matter. We look forward to further discussions.



Warren Taylor
General Manager Property Investment Analytics
Vicinity Centres

DTI:PlanSA Submissions

From: Ryan Moyle [REDACTED]
Sent: Monday, 6 November 2023 12:00 PM
To: DTI:PlanSA Submissions
Subject: Submission – Greater Adelaide Regional Plan Discussion Paper - 60 Gawler Road, Two Wells
Attachments: 20231103_60 Gawler Rd Two Wells_GARP Submission_FINAL.pdf

Follow Up Flag: Follow up
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Dear Sir/Madam,

Please find attached a submission to the *Greater Adelaide Regional Plan Discussion Paper* on behalf of **Vinasan Pty Ltd** - the landowner at 60 Gawler Road, Two Wells.

We look forward to the next steps in preparing the *Greater Adelaide Regional Plan*.

Kind regards,

Ryan Moyle
Director



3rd November 2023

Growth Management Team
Planning and Land Use Services
Department for Trade and Investment,
GPO Box 1815
ADELAIDE SA 5001

Attn: *Growth Management Team*

By Email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

RE: SUBMISSION ON THE GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER – VINASAN PTY LTD ON LAND AT 60 GAWLER ROAD, TWO WELLS

1. INTRODUCTION

We act for Vinasan Pty Ltd ['Vinasan'], who own a substantial landholding situated at 60 Gawler Road, Two Wells, located within the Adelaide Plains Council (the 'subject land').

The subject land has been identified within a 'Growth Investigation Area' under the Greater Adelaide Regional Plan Discussion Paper (the 'Discussion Paper'), which is supported by our client who has expressed an immediate desire to rezone and development the land for residential purposes.

We commend the State Planning Commission (SPC) for releasing the Discussion Paper early in the process of creating the next iteration of the Regional Plan for Greater Adelaide and seeking community and stakeholder input to inform the strategic direction on how and where Greater Adelaide should grow.

As set out in the submission below, the subject land is highly suitable for urban expansion based on its single ownership and limited constraints. It is well positioned to be developed to contribute to the urban growth needs for Greater Adelaide.

2. SITE AND LOCALITY OVERVIEW

2.1 The Subject Land

The subject land is located on one(1) Certificate of Title, described as Allotment 382 in Filed Plan 174849 (60 Gawler Road, Two Wells) Certificate of Title Volume 5659 Folio 662. The subject land is also illustrated in **Figure 2.1**:



Figure Error! No text of specified style in document..1: Aerial of Subject Site

The landholding comprises an overall area of approximately 20.1 hectares, with frontages to Gawler Road and Williams Road. Gawler Road is under the care and control of the Commissioner of Highways and connects Two Wells to Gawler.

The subject site is mostly flat and comprises two (2) dwellings and several rural buildings and structures.

Relevant to this submission, the current land has not been highly productive and is used for low-intensity cropping and grazing.

2.2 The Locality & Context

The subject land is situated in a relatively flat area that generally comprises low intensity cropping and grazing, or agricultural uses. The locality also comprises a high number of rural living numbers of between 1-2 hectares.

To the south of the subject land is a recently subdivided rural lifestyle estate within Burne Court. This development was subdivided prior to the application of the Environment Food Protection Overlay across the locality, and comprises 13 allotments of approximate 1 hectare each.

To west of the subject land are a series of rural living allotments with frontage to Williams Road. Further west of these allotments is a large expansive parcel that is used for low level cropping.

To north of the of the subject land, and north of Gawler Road, is land located within the Rural Horticulture Zone. This land is largely used for cropping and grazing, as is land to the west of the subject land.

2.3 Existing Zone & Policy Framework

The subject land is currently located within the ‘**Rural Living Zone**’ of the Planning and Design Code (Version 2023.15 dated 26 October 2023). **Figure 2.2** identifies the current zoning that applies to the subject site and surrounding properties.



Figure 2.2 – Existing Zoning (Source: SAPPA)

The subject land is affected by a number of ‘Overlays’ as follows:

- Defence Aviation Area (All structures over 90 metres)
- Environment and Food Production Area
- Hazards (Flooding)
- Hazards (Bushfire - General)
- Hazards (Flooding - General)
- Native Vegetation
- Prescribed Wells Area
- Traffic Generating Development
- Urban Transport Routes

The subject land is also affected by Technical Numeric Variations (TNV), comprising a *Minimum Site Area (Minimum site area 8 ha)*

2.4 Strategic Context

Adelaide Plains is one of SA’s fastest growing Councils, with 80% of known population growth around the township of Two Wells facilitated by the approval of the ‘*Two Wells Residential Development Plan Amendment*’ (DPA) in 2013 which enabled the expansion of the Two Wells township by an additional 3,000- 3,500 dwellings and an anticipated 8,000 and 11,000 new residents. The majority of growth has occurred to the north of the established township in the Hickinbotham Eden Estate and the Liberty Estate.

Council recently adopted a ‘*Growth Strategy and Action Plan*’ (GSAP) at its meeting on 24 April 2023 to identify strategies and actions to achieve the liveable population growth of Adelaide Plains. A key

initiative of the GSAP is the establishment of a ‘three town service model’ with sustainable growth within Two Wells, Mallala and Dublin (refer to [Figure 2.2](#)).

The GSAP envisages a cohesive country community of 10,500 people in Two Wells with actions to support township growth including a revitalised Main Street, a Council / Community civil hub, a walking and cycling plan, an expanded recreation and sport hub and increased housing options via a ‘Community Waste Water Management Scheme’ (CWMS) for the original township.



Figure Error! No text of specified style in document..2 ‘Three town service model’ - Growth Strategy and Action Plan (Source: Adelaide Plains Council)

As part of preparation of this submission a comprehensive review of relevant policy across State Government and Adelaide Plain Council was undertaken, including State Planning Policies, *The Regional Plan - The 30-Year Plan for Greater Adelaide – 2017 (Update)*, and key Council strategic plans such as the *Adelaide Plains Strategic Plain 2020-2024*, the *Adelaide Plains Council Growth Strategy & Action Plan* , and more. Relevant to this submission are the following key findings:

- The Two Wells township and town centre is undergoing substantial community & social infrastructure investment to cater for anticipated rapid growth and expansion of Two Wells;
- Key projects including the new ‘Town Centre Development Site’ and ‘Two Wells Oval Precinct’ currently being undertaken by Council;
- A clear direction across all levels of government for the short-term delivery of substantial volumes of affordable housing, particularly in areas that are established, well-serviced, & connected to jobs;
- New housing & jobs should be established along key transport corridors;
- Building community resilience to the effects of climate change (WSUD, urban forestry, walkable neighborhoods); and

- Protection of prime agricultural & horticultural land.

3. GREATER ADELAIDE REGIONAL PLAN DISCUSSION PAPER

The Greater Adelaide Regional Plan (GARP) Discussion Paper identifies that current population projections demonstrate that by 2051 we must plan for an additional 670,000 people in Greater Adelaide. The Paper outlines that we need to supply 300,000 new homes to meet the projected population increase. This means that we will need to identify (and protect land) for an additional 100,000 homes beyond the current capacity for an additional 200,000 homes (164,000 homes in land already zoned for residential development and a further 47,000 homes that could be accommodated on land already identified for future residential rezoning).

The Paper identifies that an additional 100,000 homes is the equivalent of 10 Concordia or Dry Creek developments, and that under this growth scenario that we will run out of land for future residential development within Greater Adelaide within 30 years if an ongoing rezoning program is not developed.

The Discussion Paper has identified that growth will balance greenfield, township and infill development, in the right places, with well-timed infrastructure provision. In respect to 'Greenfield Development', the Discussion Paper identifies that master planning and upfront consideration of infrastructure and services is critical to success.

The Paper projects that the highest proportion of new growth will be located within the 'Outer North' area, with almost 18,200 new homes or 18% of the projected 'Future Urban Growth' within this area of Greater Adelaide (refer to **Figure 3.1** below).

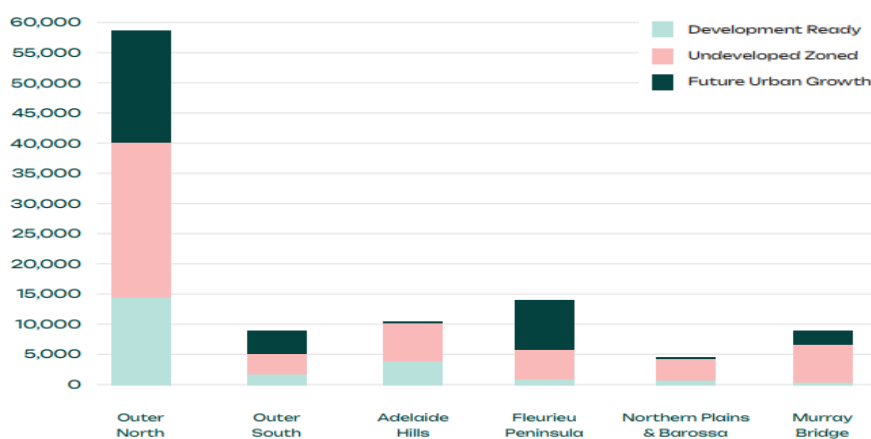


Figure Error! No text of specified style in document..3: Projected Future Land Supply CBD (Source: Greater Adelaide Regional Plan Discussion Paper)

The Discussion Paper identifies four (4) main greenfield 'Investigation Areas' on the fringe of Metropolitan Adelaide for future housing and employment growth, with these areas being based on the State Planning Commission's seven (7) identified land supply principles (also referenced in the Discussion Paper). The areas proposed for detailed investigation extend from Adelaide's four major

transport spines with the intent to capitalise on ongoing government investment along these growth corridors.

This includes a 'north-west spine' that begins at the southern end of the Port Wakefield Highway stretching northward past the Riverlea development to Two Wells, and then continues further north along the highway. The subject land benefits from its location with Two Wells, which is envisaged by the Discussion Paper to cater for a substantial amount of growth for the Outer North sub-region given its strong strategic advantages.

4. SITE SUITABILITY FOR URBAN DEVELOPMENT

4.1 Logical Urban Expansion

The subject land is immediately adjacent the eastern fringe of the Two Wells township amongst landholdings that have been subdivided over a long period of time in an ad-hoc manner. This has resulted in the locality being unviable for primary production purposes and a large expansive Rural Living Zone replicates this historic subdivision pattern.

The subject land is located approximately 2km from the Two Wells township core (being the existing Township Main Street Zone) and is directly accessible via Gawler Road. This land is located more proximate to the existing services and infrastructure of Two Wells than land within the northern most areas of the existing Master Planned Neighbourhood Zone.

Continuing the northern growth front further north as depicted in the Discussion Paper would result in an illogical township footprint and result in northern growth areas being secluded from the Two Wells township core.

Ideally, Two Wells should take this current opportunity to plan for new urban growth by focusing on achieving a more concentric growth pattern, as consistent with regional centres across South Australia (such as Gawler, Mount Barker and Mount Gambier). Concentric growth is typically the most efficient way for towns to grow, where urban development is centred around the central township core. This leads to maximising access to existing infrastructure and services already present in the township, and can further justify further investment and expansion of these services.

4.2 Capacity for Growth

Referencing State Planning Policy 6 – Housing Supply and Diversity, the Discussion Paper acknowledges the need to *“ensure land supply responds to future demand, as informed by population projections and demographic trends”* and to *“provide a range of well-designed, diverse, and affordable housing options across the region”*.

Assuming a conservative yield of 10 dwellings per hectare (gross) and noting the existing land area of 20.1 hectares, the subject land could yield in the order of approximately 200 dwellings. Assuming 60% of the land is used for residential purposes, and the balance of land is used for non-residential

purposes (roads 25%, open space 12.5%, utilities and stormwater 2.5%) this would equate to a net density of 16.6 dwellings per hectare, with an average lot size of 600 sqm.

Based on a limited 'desktop' assessment of the site (and setting aside the current EFPA boundary), we are of the opinion that the site would have limited constraints that would prevent future development achieving this dwelling yield given:

- Corridor Location – the subject land is located within Two Wells which is located along the 'North-Western Spine' identified within the Discussion Paper;
- Topography – The land is largely flat, with the opportunity for a careful engineered solution to balance cut and fill with the delivery of required stormwater infrastructure;
- Native vegetation – the site has been predominantly cleared of vegetation and is being used for low intensity grazing and cropping. The single mature tree could likely be retained and accommodated in any future development of the subject land;
- Flooding – the current Hazards (Flooding) and Hazards (Flooding – General) Overlay areas over the subject site could be suitably mitigated through an engineered response in a future development of the subject site, including possible incorporation of any required stormwater conveyance and detention in future open space reserves and corridors; and
- Heritage – There are no State or local Heritage Places on the subject land.

Through an appropriate infrastructure funding mechanism, the staged delivery of necessary infrastructure will coincide with continued logical growth of the subject land.

4.3 Social & Community Infrastructure

The subject land is well situated within Two Wells, and located approximately 2km to the existing and future expanded Two Wells town centre. The land will also benefit from convenient access to other facilities and services such as:

- Various educational and community facilities including Xavier College (reception to Year 9), Two Wells Primary School Two Wells Community Children's Centre, and Two Wells Uniting Church
- Shopping centres and other services such as Two Wells Main Street Precinct (and future Two Wells Town Centre), Two Wells Medical Clinic and Two Wells Service Centre & Library

4.4 Propensity for Development

The land is under the single ownership by Vinasan who strongly support:

- The identification of the subject land as a future urban growth area;
- The removal of the Environment & Food Production Area (EFPA) from the subject land;
- The immediate initiation of a Code Amendment to establish appropriate zoning for commercial and residential development,

The subject site therefore has a strong propensity for future development and delivery to market should it be identified as a future urban growth area to contribute to the supply of affordable housing across Greater Adelaide. Vinasan have owned the land as a family for nearly 60 years, and has held a long term vision that their land would one day form part of a thriving and growing Two Wells.

5. CONCLUSION

This submission is provided to assist the State Planning Commission's with its preparation of the Greater Adelaide Regional Plan.

We are of the opinion that the subject land represents a significant opportunity for the future expansion of the Two Wells Township. This view is reinforced through the Greater Adelaide Regional Plan Discussion Paper, which has designated the subject land as a Growth Investigation Area to meet the future land supply needs for Greater Adelaide.

Based on a preliminary 'desktop' analysis, the subject site does not have any likely constraints that would prevent or inhibit future urban development and is under the control of a single entity to enable a coordinated approach and delivery of future housing in a master planned community. This is however contingent upon the EFPA being removed from the subject site.

Vinasan therefore request that the subject site is identified as a 'Future Urban Growth' area in the next iteration of the Greater Adelaide Regional Plan (GARP) with recognised potential for immediate rezoning and development (0-15 years) for residential lands.

Please do not hesitate to contact the undersigned below should you require any additional information in support of this submission and request.

RJM Planning & Design

[Redacted signature block]

CC: Mr Vincenzo Francesca c/o Vinasan Pty Ltd

DTI:PlanSA Submissions

From: Sarah Lowe [REDACTED]
Sent: Monday, 6 November 2023 4:42 PM
To: DTI:PlanSA Submissions
Cc: Anita Allen; Grazio Maiorano
Subject: GARP Discussion Paper Submission - Golden Grove
Attachments: 231105 V1 GARP Submission.pdf

Follow Up Flag: Follow up
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Good afternoon,

Please find attached a submission prepared on behalf of YAS Property & Development and Falkenburg Road Pty Ltd.

Kind regards,

Sarah



Sarah Lowe
Consultant
[REDACTED]

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Kaurna Country

My working hours are:
Monday to Friday 8.30am-5.00pm

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6 November 2023

Growth Management Team, Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
Adelaide SA 5001
plansasubmissions@sa.gov.au

Submission to the Greater Adelaide Regional Plan (GARP) Discussion Paper – Golden Grove Code Amendment

We act for YAS Property & Development and Falkenburg Road Pty Ltd, the owners of a significant landholding in Golden Grove (the Affected Area).

Thank you for the opportunity to comment on this Discussion Paper (Paper) which seeks to stimulate debate on how the GARP will help deliver the 300,000 additional homes and associated employment land possibly needed over the next 30 years.

Affected Area

The Affected Area is illustrated in Figure 1.

It comprises 21 partial or entire allotments, forming a total area of approximately 106ha. The entire Rural Living Zone in Golden Grove is captured as part of the Affected Area, except for 1 allotment. It is positioned between the Hills Face Zone to the east and the General Neighbourhood Zone to the west.

The Hills Face Zone will be preserved as a landscaped backdrop to the land and an important element of Adelaide's visual character.

The adjacent General Neighbourhood Zone primarily contains dwellings and a retirement village developed at low and medium and densities.

The nearby SAC Zone contains the 'Stables Shopping Centre', which is a neighbourhood-level centre built within the last 10 years. It contains a full line supermarket, liquor shop, medical consulting rooms, chemist, child care centre, hair salon, cafes and eateries.



Figure 1: Affected Area

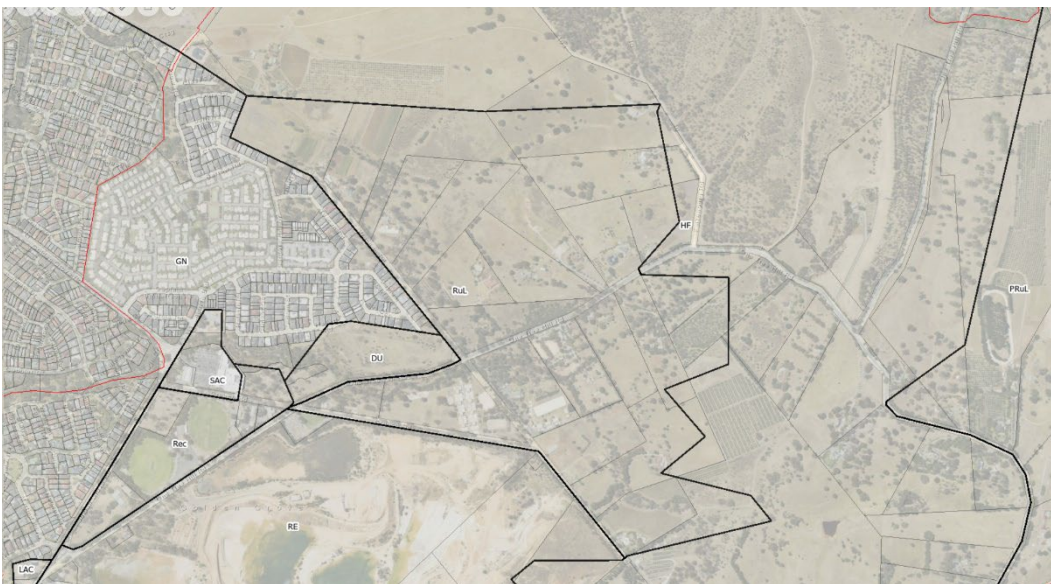


Figure 2: Existing Zoning

Requested Outcomes

Our clients:

- Support the Paper, where it expressly identifies the importance of strategic infill and master planning that can achieve efficient land use and high-quality urban design.
- Request the GARP ultimately identifies the Affected Area as future residential land.

Justification

Consistent with the Intent of the Discussion Paper

The Paper indicates Greater Adelaide's population could grow by 670,000 people in the next 30 years, requiring targeted greenfield and infill development to provide appropriate housing and employment for these people. Further, the Paper suggests:

Identifying opportunities for strategic infill development must be a priority. Larger sites near jobs, services and transport options can relieve housing pressure on other areas, such as our food and wine growing regions and heritage areas. With a master planned approach we can achieve higher densities that offer diverse and affordable housing close to businesses and industry

Finding suitable greenfield land for development will be another part of the solution... We need to identify greenfield opportunities for longer term housing and employment.

The Affected Area is one of the last remaining areas within the City of Tea Tree Gully (TTG) available for additional population and housing growth. The Affected Area is well serviced and will expand the established community while providing opportunities for an attractive open space network. This provides an opportunity to preserve substantial areas of existing trees and intact vegetation.

The Paper highlights that infill development supports the “Living Locally” principle. Providing new housing near employment, amenities and transport options allows more people to benefit from investments in infrastructure and service delivery. Therefore the Discussion Paper also aligns with Code Amendment proposed over the Affected Area.

Rare Strategic Opportunity

The Affected Area presents deliver a new community that:

- Is well designed and master planned.
- Supports the orderly expansion of Greater Adelaide's urban footprint, protecting the loss of important primary production land and sensitive natural features.

- Enables the efficient use of existing utilities and infrastructure within the locality and supports the provision of new infrastructure.
- Capitalises on the existing public transport network that services the region, including the O-Bahn which provides very high frequency and fast travel between Modbury and the City.
- Provides a diverse range of new housing opportunities in a high amenity location that meets housing preferences and lifestyle choices.
- Supports the provision of Affordable Housing outcomes to assist new homebuyers to enter the housing market.
- Contributes to the local economy and jobs within the City of Tea Tree Gully.
- Enables the protection of existing non-residential activities, including supporting additional service-based economy (e.g. retail and service industries).
- Will feature appropriate interface management policies associated with the quarry.

In addition to the above, we highlight that the owners have clearly demonstrated a capacity and commitment to redevelop the Affected Area for residential purposes, as evidenced by their preparation of a proposed Code Amendment.

We see little merit in maintaining the existing Rural Living Zoning. All of the landholders in the Zone (except for 1 allotment) wish to develop the land at greater intensity, the land is of little productive value to the economy, and the land is of low environmental value as much of it has previously been cleared and planted with exotic species.

Aligned with State Planning Policies (SPPs)

SPPs represent the highest level of policy in the planning system and address the economic, environmental and social planning priorities for South Australia. Our clients' vision is aligned with the SPPs relevant to the Paper, as summarised below.

SPP	Ideas for the GARP in relation to greater housing choice in the right places	Alignment to this Submission
SPP 1 – Integrated Planning	<ul style="list-style-type: none"> • Plan new greenfield growth near existing or new employment nodes. 	The Affected Area contributes to an adequate supply of land that is serviced by infrastructure for housing growth over the next 10-15 years. Further it supports a logical extension of the existing urban footprint.

SPP	Ideas for the GARP in relation to greater housing choice in the right places	Alignment to this Submission
SPP 4 –Biodiversity	<ul style="list-style-type: none"> Avoid growth in areas of national and state environmental significance. 	<p>A preliminary analysis of vegetation and habitat has been undertaken which confirms that most of the land is exotic vegetation with only small pockets of high habitat value.</p> <p>Open space will be prioritised in future development.</p>
SPP 6 - Housing Supply and Diversity	<ul style="list-style-type: none"> Identify strategic infill sites to provide more housing choices in areas near public transport, services and employment options. 	<p>The Affected Area will provide well-serviced housing and land choices as required. The Code Amendment proposes the Affordable Housing Overlay to promote affordability in the locality</p>

Conclusion

We support the intent of the Discussion Paper and the desire to identify strategically important sites for infill and greenfield development. Further, we request the Affected Area is identified as future residential land within the GARP because:

- This is closely aligned with the intent of the Paper and State Planning Policies.
- The Affected Area is well suited for residential purposes. It forms a logical expansion of an established residential area; leverages existing infrastructure and community services; enjoys an attractive natural backdrop provided by the Hills Face Zone; and aligns with the objectives of the City of Tea Tree Gully's Strategic Plan 2025
- The Premier identified the Affected Area to unlock residential development.

We are keen to work with the Commission, state agencies and Council to ensure the development of this land and the delivery of the identified residential objectives.

Yours sincerely,



Sarah Lowe
Consultant