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Leinad Land Developments (Dublin) Pty Ltd  
c/- Mr Rick Hutchins  
Associate  
Ekistics Planning and Design

By email: [rhutchins@ekistics.com.au](mailto:rhutchins@ekistics.com.au)

Dear Mr Hutchins

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 approved the Proposal to Initiate the Dublin Green Circular Economy Precinct (Employment Areas) Code Amendment.

A copy of the signed Proposal to Initiate is enclosed for your reference.

The initiation approval is on the basis that under section 73(4)(a) of the Act, Leinad Land Developments (Dublin) Pty Ltd will be the Designated Entity responsible for undertaking the Code Amendment process.

I note that the Code Amendment is informed by the Designated Entity's *Urban Framework Plan* (the Framework), which includes a long-term residential expansion component. I note that this Code Amendment does *not* include residential rezoning and advise that this initiation should not be taken as support for such. Any proposals for residential land uses will need to be considered as part of a separate Proposal to Initiate in the future.

Furthermore, I note that this Code Amendment is only seeking to rezone the employment component of this Framework. This being the case, I suggest for clarity that the Code Amendment be renamed to the 'Dublin Employment Code Amendment' to minimise any risk of confusion in the community.

Pursuant to section 73(5) of the Act, the approval is also subject to the following conditions:

- Prior to adoption of the Code Amendment, the Designated Entity must demonstrate to the satisfaction of the Minister for Planning that all necessary agreements or deeds are fully executed as required to secure the funding and/or delivery of all infrastructure required to accommodate the development of the affected area, as proposed by the Code Amendment (to the satisfaction of all relevant infrastructure providers).

- The scope of the proposed Code Amendment does not include the creation of new planning rules, and is limited to the spatial application of zones, subzones, overlays, or technical and numerical variations provided for under the published Planning and Design Code on the date the Amendment is released for engagement.
- The Code Amendment is prepared by a person with qualifications and experience that is equivalent to an Accredited Professional—Planning Level 1 under the Act.
- In respect to a review of bushfire hazard risk levels, the Code Amendment does not include changes to the applicable Hazard – Bushfire Overlays. The State-wide Bushfire Hazards Overlay Code Amendment will establish an updated methodology for assessing bushfire risk levels across the state, following which the overlays will be updated as necessary via section 71 of the Act.

In addition, the Commission has specified under section 73(6)(e) of the Act that the Designated Entity must consult with the following stakeholders:

- Department for Energy and Mining.
- Department for Environment and Water – Green Adelaide, Coast Protection Board, Native Vegetation Council, National Parks and Wildlife Service South Australia.
- Department for Infrastructure and Transport.
- Department of Primary Industries and Regions.
- Environment Protection Authority.
- Green Industries SA.
- Integrated Waste Management Pty Ltd Reference Group.
- Kurna Yerta Aboriginal Corporation RNTBC.
- Kurna Nation Cultural Heritage Association.
- Regional Development Australia – Barossa, Gawler, Light, Adelaide Plains.
- South Australian Country Fire Service.
- South Australian Fire and Emergency Services Commission.
- South Australian Metropolitan Fire Service.
- State Members of Parliament for the electorates in which the proposed Code Amendment applies.
- Utility providers including SA Power Networks, ElectraNet, APA Group, SEAgas, SA Water, Epic Energy, NBN, Office of the Technical Regulator, and other telecommunications providers.

Further, the Commission has, under section 73(6)(f) of the Act, resolved to specify the following further investigations or information requirements in addition to that outlined in the Proposal to Initiate:

- Considering existing, zoned employment land supply within the region, undertake detailed analysis that:
  - Investigates the quantity and type of employment land required in the region, in the context that the Carslake Road Strategic Employment Zone site is 880 hectares, and 488 hectares is largely undeveloped with significant further development capacity. When investigating this, consideration should be given to ability of land to be serviced ('development ready').

- Considers the capacity for the region to accommodate nearly 1,300 hectares of zoned employment land in the context of new employment areas flagged for discussion in the Greater Adelaide Regional Plan Discussion Paper.
- Identifies cumulative impacts of development on existing infrastructure (road, water, power, wastewater, gas) in the context of existing employment land supply within the region, and whether the Proposal will constrain the ability for such zoned land to be developed in the short-, medium- and long-term.
- Substantiate the concept and delivery of the 'Green Circular Economy', including commentary on whether supply chains have been established (including waste to fuel the bioreactor).
- Provide a comprehensive infrastructure analysis by an appropriately qualified expert(s) that identifies all future infrastructure works required to accommodate the development of the affected area as proposed by the Code Amendment and provide a strategy which offers a funding and delivery solution for all required infrastructure works. This should also take into consideration the potential impact on, or integration with, existing employment and urban activities in the area (particularly Integrated Waste Services located south of the affected area).
- Undertake investigations into potential noise, odour and air quality interface impacts of intended development on the site (bioreactor, mining), both in terms of impacts on the Dublin township as well as potentially sensitive uses within the affected area and identify mitigation measures. This could include zoning/overlay choices and/or identification of mitigation measures on a Concept Plan.
- Undertake further investigations to confirm buffer requirements to address noise/odour associated with the existing chicken broiler and, where necessary, reflect in zone/overlay choice and identify on a Concept Plan.
- Consider the use of a Concept Plan to identify key matters such as access points and linkages within the affected area and to Dublin/public trails, interface management/buffer areas (including interfaces with existing urban, rural and conservation areas, as well as internal interfaces), open space and water retention/detention areas.
- Explore the appropriateness of the Strategic Employment Zone recognising the need for waste management (stockpiling and processing).

In addition, it should be noted that further investigations may be required in response to feedback or advice received through the engagement process. Planning and Land Use Services (PLUS) of the Department for Trade Investment will ensure that relevant outcomes of investigations to inform the Greater Adelaide Regional Plan will be made available to the Designated Entity.

Pursuant to section 44(6) and 73(6)(d) of the Act, consultation in writing must be undertaken with:

- Adelaide Plains Council.
- Owners or occupiers of the land and adjacent land, in accordance with Regulation 20 of the *Planning, Development and Infrastructure (General) Regulations 2017*.

Engagement must be undertaken on the Code Amendment in accordance with the Community Engagement Charter. More information on the Community Engagement Charter is available in the Community Engagement Charter toolkit online at [https://plan.sa.gov.au/resources/learning\\_and\\_toolkits/community\\_engagement\\_charter\\_toolkit/overview](https://plan.sa.gov.au/resources/learning_and_toolkits/community_engagement_charter_toolkit/overview).

I will make a determination on whether to approve the proposed amendments at the completion of the Code Amendment process.

For further information, please contact Ms Nadia Gencarelli, Manager, Code Amendments, PLUS, on (08) 7133 2311 or via email at [Nadia.Gencarelli@sa.gov.au](mailto:Nadia.Gencarelli@sa.gov.au).

Yours sincerely



**Hon Nick Champion MP**  
Minister for Planning

22 / 3 / 2024

Encl. Signed Proposal to Initiate the Dublin Green Circular Economy Precinct (Employment Areas) Code Amendment