

Proposal To Initiate

Lakeside Goolwa Code Amendment

August 2023

REF 01322



## ACKNOWLEDGEMENT TO COUNTRY

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

### PROPRIETARY INFORMATION STATEMENT

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Revision	Description	Author	Date
V1	Draft for client review	R Moyle	27 July 2023
V2	Draft Updated	C Orford	10 August 2023
Final	Final for submission	R Moyle	16 August 2023



**PROPOSAL TO INITIATE AN AMENDMENT TO  
THE PLANNING & DESIGN CODE**

**Lakeside Goolwa Code Amendment**

**By Goolwa Tourist Resort Pty Ltd (the Proponent)**

\_\_\_\_\_  
(Signature Required)

**Goolwa Tourist Resort Pty Ltd (the Proponent)**

Date: 15/8/23

This Proposal to Initiate document together with conditions specified by the Minister forms the basis for the preparation of a proposed amendment to the Planning and Design Code for the purpose of section 73(2)(b) of the Planning, Development and Infrastructure Act 2016. By signing this Proposal to Initiate, the Proponent acknowledges and agrees that this Proposal to Initiate, and any supporting documents may be published on the PlanSA portal by the Attorney General's Department.

\_\_\_\_\_  
(Signature Required)

**MINISTER FOR PLANNING**

Date: 5/12/23

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## 1. INTRODUCTION

The Proponent is proposing to initiate an amendment to the Planning and Design Code (the Code Amendment) as it relates to land located at 4-16 Banfield Road, Goolwa North (the Affected Area).

The purpose of this Proposal to Initiate is to seek approval of the Minister for Planning [‘the Minister’] to initiate the Code Amendment under section 73(2)(b) of the Planning, Development and Infrastructure Act 2016 (the Act).

The Proponent, ‘Goolwa Tourist Resort Pty Ltd’, has an interest in the land (as the registered proprietor) for the whole of the Affected Area.

This Proposal to Initiate details the scope, relevant strategic and policy considerations, nature of investigations to be carried out and information to be collected for the Code Amendment. It also details the timeframes to be followed in undertaking the Code Amendment, should this Proposal to Initiate be approved by the Minister.

The Proponent acknowledges that the Minister may specify conditions on approving this Proposal to Initiate, under section 73(5) of the Act. In the event of inconsistency between this Proposal to Initiate and any conditions specified by the Minister, the conditions will apply.

### 1.1. Designated Entity for Undertaking the Code Amendment

In accordance with Section 73(4)(a) of the Act, the Proponent will be the ‘Designated Entity’ responsible for undertaking the Code Amendment process. As a result:

- 1.1.1. The Proponent acknowledges that it will be responsible for undertaking the Code Amendment in accordance with the requirements of the Planning Development and Infrastructure Act 2016 [‘The Act’]
- 1.1.2. The Proponent declares that it has not and does not intend to enter into an agreement with a third party for the recovery of costs incurred in relation to the Code Amendment under Section 73(9) of the Act. If the Proponent does enter into such an agreement, the Proponent will notify the Department prior to finalising the Engagement Report under Section 73(7).
- 1.1.3. The Proponent’s contact person responsible for managing the Code Amendment and receiving all official documents relating to this Code Amendment is:
  - (a) Ryan Moyle - Associate, Ekistics Planning and Design
  - (b) [rmoyle@ekistics.com.au](mailto:rmoyle@ekistics.com.au)
  - (c) 08 7231 0286
- 1.1.4. The Proponent intends to utilise the services of Ekistics Planning and Design Pty. Ltd. [‘Ekistics’] to assist it in undertaking the Code Amendment. Ekistics is a specialist planning consultancy comprising a team of Accredited Professionals with significant experience in the preparation of planning policy as well as land use investigations and community engagement. The Code Amendment process will be undertaken by planning practitioners who have qualifications and experience that is equivalent to an Accredited Professional – Planning Level 1.
- 1.1.5. Either Ekistics or a separate independent community engagement specialist (to be confirmed) will be engaged to undertake required community engagement in accordance with ‘Practice Direction 2 – Consultation on the Preparation or Amendment of a Designated Instrument’ and the ‘Community Engagement Charter’. Required

community engagement will be undertaken by a fully accredited IAP2 specialist with extensive skills and experience in community engagement.

- 1.1.6. The Proponent acknowledges that the Minister may, under Section 73(4)(b) of the Act, determine that the Chief Executive of the Department will be the Designated Entity responsible for undertaking the Code Amendment. In this case, the Proponent acknowledges and agrees that they will be required to pay the reasonable costs of the Chief Executive in undertaking the Code Amendment.

## 1.2. Rationale for the Code Amendment

The following outlines the reasons for the preparation of the Code Amendment and why a review of the existing zoning and policy framework associated with this site is appropriate. An overview of the Affected Area and Locality is initially provided as this outlines important context to the rezoning proposal.

### 1.2.1. Affected Area

The proposal seeks to amend the Code for the Affected Area (identified in Figure 1-1), comprising four (4) allotments in a 9-hectare land holding located to the north of an existing Residential Park (Lakeside Goolwa Residential Park), approximately 3km north-east of the Goolwa township in the suburb of Goolwa North.

The land comprises the following allotments (referenced in Figure 1-1):

1. 16 Banfield Road – CT 5693/461 – Lot 103 in DP 13542
2. 12 Banfield Road – CT 5692/583 – Lot 106 in DP 13542
3. 6-8 Banfield Road – CT 5062/315 – Lot 107 in DP 13542
4. 4 Banfield Road – CT 6095/954 – Lot 54 in DP 89165

The land has frontage to both Banfield Road and Fidock Road, with vehicle access provided via both street frontages to the various allotments. The Affected Area comprises a number of large, semi-rural lifestyle allotments and currently contains a dwelling, various outbuildings, water tanks and some vegetation.



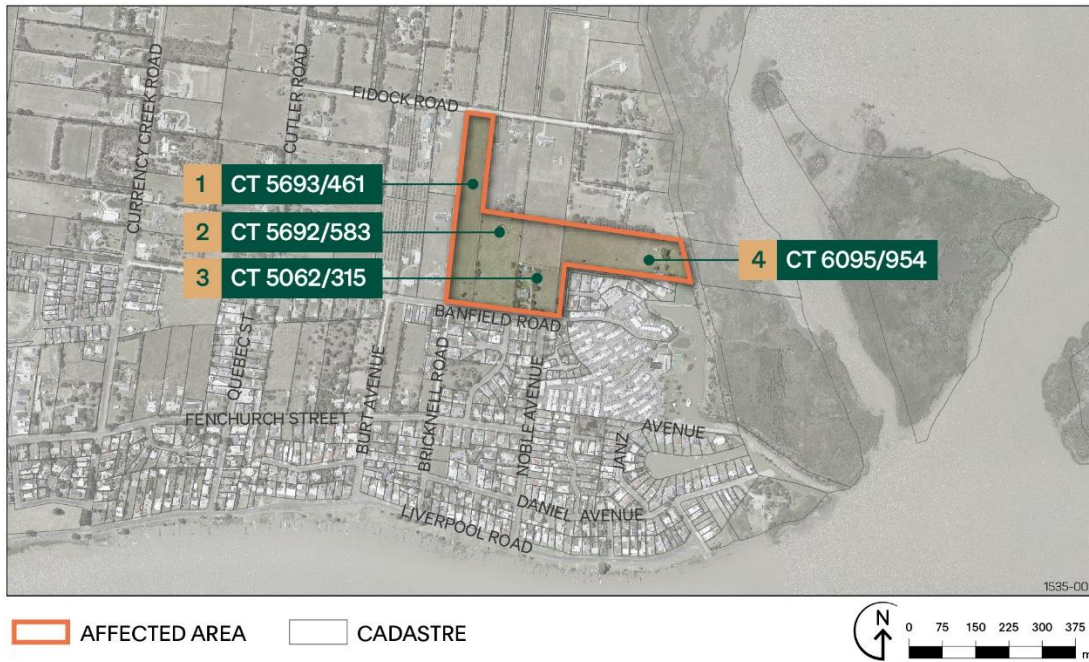


Figure 1–1 Affected Area

The majority of the Affected Area is located within the Rural Living Zone, with the eastern portion adjoining Currency Creek located within the Conservation Zone (Visitor Experience Subzone). The existing Residential Park to the south of the Affected Area is zoned Tourism Development and Residential Park.

Figure 1-2 below illustrates the zoning of the land and surrounds.

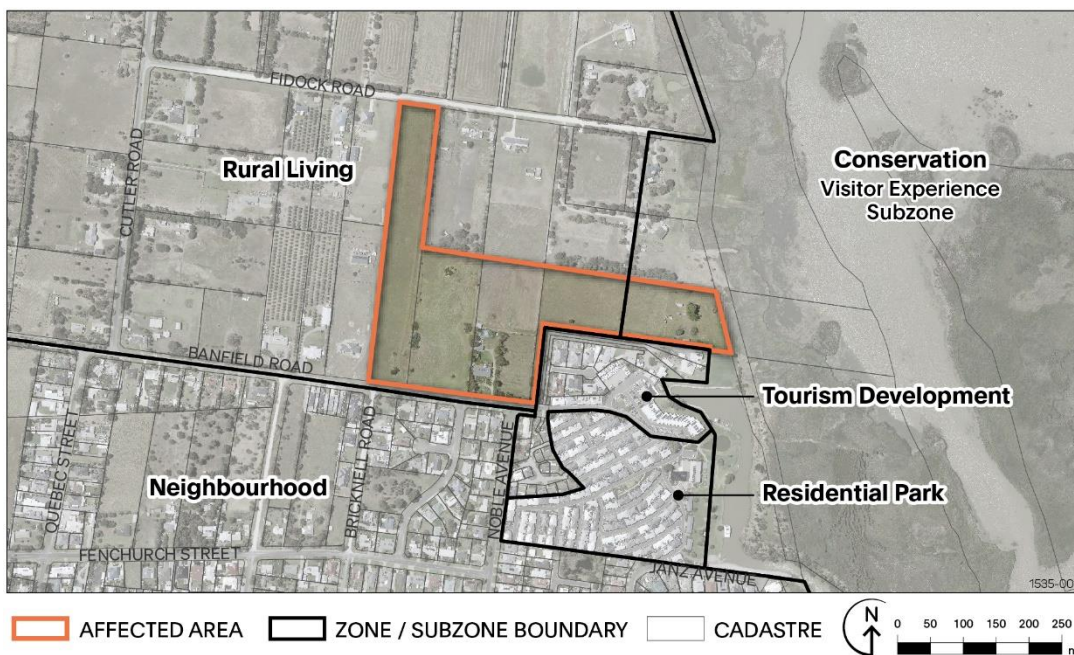


Figure 1–2 – Current Zoning of the Affected Area and Surrounds



The Desired Outcome (DO) of the 'Rural Living Zone' seeks:

**DO 1:** 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.

The Desired Outcome (DO) of the 'Conservation Zone' seeks:

**DO 1:** The conservation and enhancement of the natural environment and natural ecological processes for their ability to reduce the effects of climate change, for their historic, scientific, landscape, habitat, biodiversity, carbon storage and cultural values and provision of opportunities for the public to experience these through low-impact recreational and tourism development.

The Visitor Experience Subzone seeks:

**DO 1:** Tourist accommodation within a conservation area complements visitor experiences, and is located, sited and designed to minimise detrimental impacts on the natural environment and natural ecological processes including their historic, scientific, landscape, habitat, biodiversity and cultural values.

The portion of the Affected Area zoned Conservation is also located within the Environment and Food Protection Area (EFPA) and is subject to the Environment and Food Production Area Overlay of the Code (Figure 1-3). Introduced in December 2015, EFPA's were established to protect vital agricultural lands surrounding metropolitan Adelaide from urban encroachment. Land division for residential purposes is prevented within the EFPA.

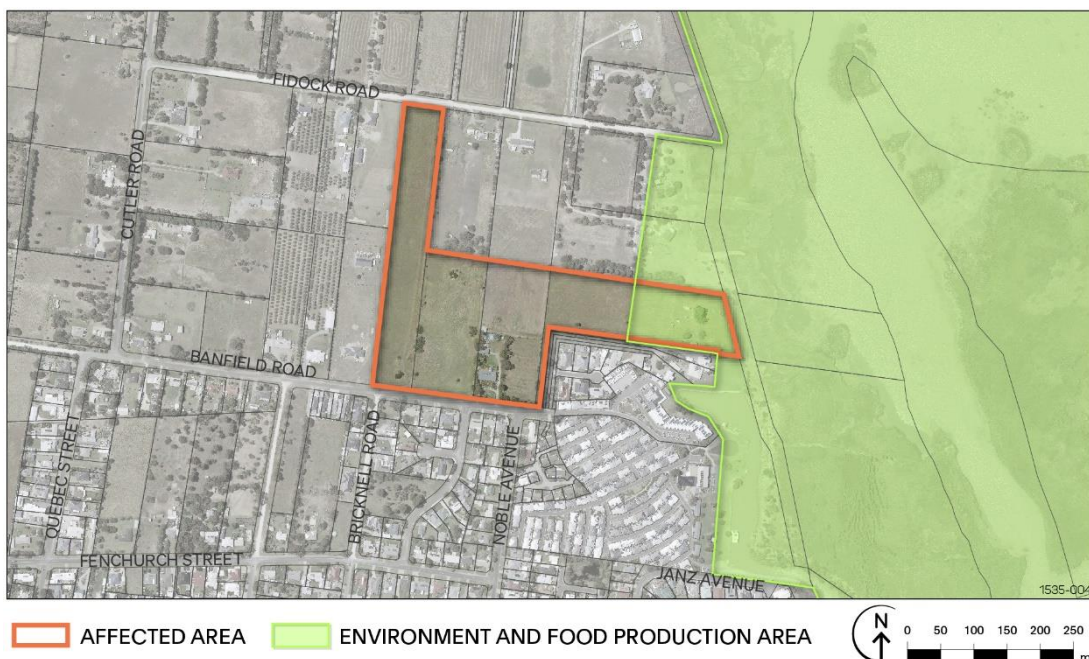


Figure 1-3- Extent of Environment and Food Production Area

The Affected Area is also covered by a Technical and Numeric Variation (TNV) which sets a minimum site area of 1 hectare.

Photos of the Affected Area and surrounds are provided in Figures 1-4 – 1-10 below.



Figure 1-4– Aerial view looking south across the Affected Area



Figure 1-5 View to north from Banfield Road to the Affected Area





Figure 1–6 View to north from Banfield Road to the Affected Area



Figure 1–7 View to north from Banfield Road to the Affected Area (private access road on right)





Figure 1–8 View to north-east from within Affected Area (within 4 Banfield Road parcel)



Figure 1–9 Existing homestead (vacated) within Affected Area (within 4 Banfield Road parcel)



Figure 1–10 View to the south towards existing Lakeside Goolwa Residential Park from within Affected Area (within 4 Banfield Road parcel)

### 1.2.2. Locality Features

The Affected Area is located in Goolwa North, approximately 3km north of the Goolwa town centre. The land is at the northern interface between the established residential area that extends along the northern shore of the Lower Murray River, and semi-rural land further north adjoining Currency Creek.

Lakeside Goolwa, an existing 'Residential Park' owned and operated by Goolwa Lifestyle Village Pty Ltd (which shares all common directors as the proponent - Goolwa Tourist Resort Pty Ltd), is located directly south of the Affected Area, and adjoins the Affected Area on the eastern side.

It incorporates approximately 158 dwellings providing long term accommodation for retirees, combined with communal and recreational facilities for residents. The residential component of Lakeside Goolwa comprises primarily two and three bedroom, one and two storey villas with integrated garages, accessed via landscaped private roads.

Communal facilities at the existing Lakeside Goolwa Residential Park include a resident's function centre, gymnasium, indoor swimming pool, sporting facilities (eg. bowling green, table tennis, darts, golf putting green etc), caravan and boat storage, private marina berths and a boat ramp. The communal indoor and outdoor recreation facilities are primarily located on the eastern side of the Residential Park, adjacent to the waterfront and a marina that includes marina berths and a private boat ramp at the southern end.

Lakeside Goolwa is mostly located within the Residential Park Zone, other than the northern portion which is zoned Tourism Development, as it was formerly occupied by a motel prior to the development of the Residential Park. The former motel building (now converted to communal recreation facilities associated with the Residential Park) and adjoining townhouses are now part of the Lakeside Goolwa development.

A community titled, low rise residential development known as Myrtle Close is located between the former motel and the south-eastern corner of the Affected Area, also within the Tourism Development Zone.

Land to the north and east of the Affected Area, located within the Rural Living Zone, comprises semi-rural living allotments with associated dwellings and low scale rural activities.

Existing residential development in the locality to the south of the land within the Neighbourhood Zone comprises primarily one and two storey detached dwellings at relatively low densities.

The eastern portion of the Affected Area and beyond, encompassing the waterfront and Currency Creek inlet of the Murray River, is located within the Conservation Zone, Visitor Experience Subzone. This area and the waterway beyond are also within the Environment and Food Production Area.

Photographs of the locality are provided in Figures 1-11 to 1-14 below, and the SAPPA land use classifications are illustrated in Figure 1-15.





Figure 1–11 Typical streetscape within the existing Lakeside Goolwa Residential Park



Figure 1–12 Lakeside Goolwa marina facilities





Figure 1–13 Lakeside Goolwa outdoor communal recreation facilities and waterfront





Figure 1–14 Typical low rise residential development south of the Affected Area (Noble Avenue)

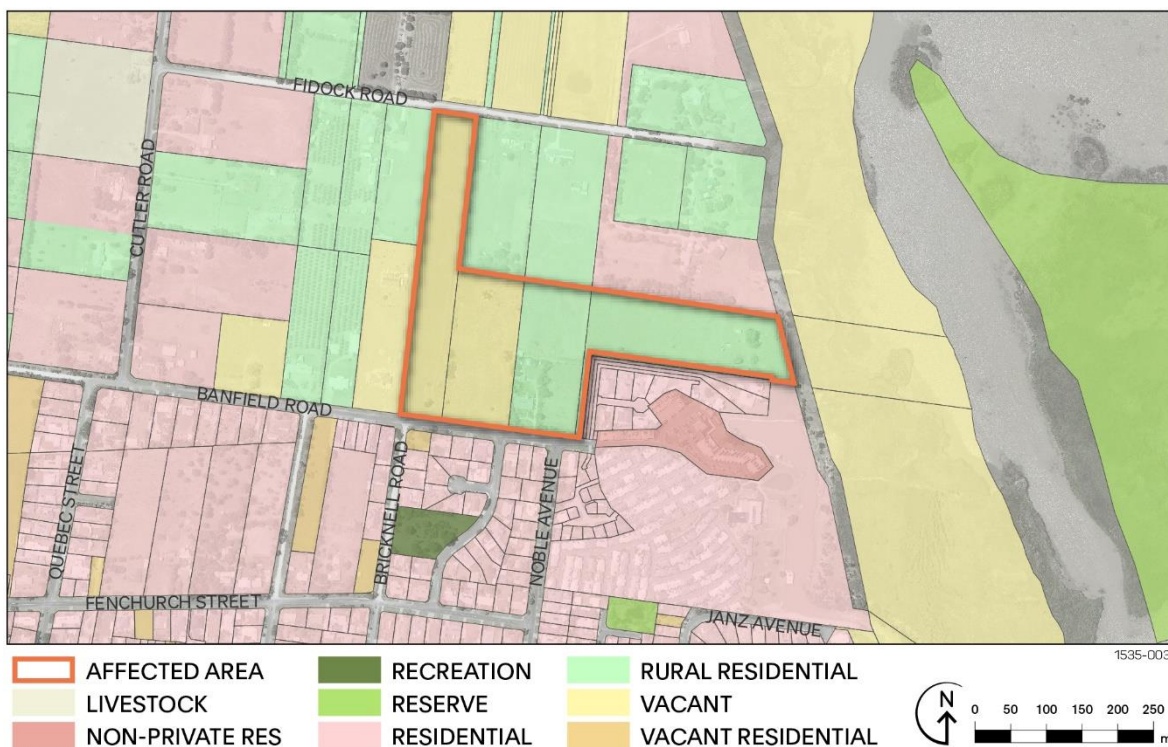


Figure 1–15 Existing Land Uses Within the Locality (SAPPA)

### 1.2.3. Rationale for the Proposed Code Amendment

The Code Amendment seeks to rezone the 'Affected Area' from the existing 'Rural Living Zone' to the 'Residential Park Zone', extending the existing Lakeside Goolwa Residential Park Zone that is located adjacent the Affected Area to the south-east.

The existing Lakeside Goolwa facility is at capacity, experiencing substantial demand generated by new residents looking to reside within the community, combined with existing residents of Goolwa seeking to downsize. The proponent is therefore seeking to extend the existing Lakeside Goolwa facility utilising the land located within Affected Area.

The rezoning will enable the expansion of the existing Residential Park, providing an opportunity to meet growing demand for affordable retirement and lifestyle accommodation for over 50's, sharing existing Residential Park facilities and services. The Affected Area is within the northern extent of the Goolwa township, enabling access to existing medical, retail and community facilities for residents of the Park.

Part 7 of the Planning and Design Code defines 'Residential Park' as:

“Means a residential park operating under the regulatory framework of the Residential Parks Act 2007.”

The existing Lakeside Goolwa is a 'Residential Park' as it meets the Planning and Design Code definition.

The proposed 'Residential Park Zone' supports the development of the type and density of accommodation, services and facilities that are associated with the development of a Residential Park. The Desired Outcome of the Residential Park Zone is:

Affordable living, short term accommodation and associated small-scale services and facilities are provided in an open landscaped setting.

Performance Outcome 1.1 seeks:

Long-term and short-term affordable and visitor accommodation predominantly characterised by caravan and camping sites, cabins, and transportable dwellings, with complementary support services that maintain a low-rise, open landscape setting.

The accompanying DTS/DPF lists the types of uses in the zone to satisfy PO 1.1, including Residential Park, community facility, indoor recreation facility, caravan (fixed permanently to land), detached dwelling, shop, office, amenity block and tourist accommodation.

Extending the Residential Park zoning across the Affected Area will enable the future expansion of the existing Lakeside Goolwa Residential Park, a type of use that whilst not restricted in the Rural Living Zone, is not envisaged by the Rural Living Zone provisions.

DO 1 of the Rural Living zone seeks:

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.

Subject to further investigations, it is anticipated that the portion of the Affected Area zoned "Conservation" will remain unchanged.

## 2. SCOPE OF THE CODE AMENDMENT

### 2.1. Affected Area

The proposal seeks to amend the Planning and Design Code for the Affected Area, comprising the following land parcels, referenced in Figure 2-1 below:

1. 16 Banfield Road – CT 5693/461 – Lot 103 in DP 135424
2. 12 Banfield Road – CT 5692/583 – Lot 106 in DP 13542
3. 6-8 Banfield Road – CT 5062/315 – Lot 107 in DP 13542
4. 4 Banfield Road – CT 6095/954 – Lot 54 in DP 89165

The Affected Area is located in the Alexandrina Council, and the adjoining roads are under the care and control of Council.

The Affected Area is irregular in shape with a frontage of approximately 257.5 metres to Banfield Road and frontage of approximately 58.5 metres to Fidock Road. The Affected Area has a total land area of approximately 9 hectares.

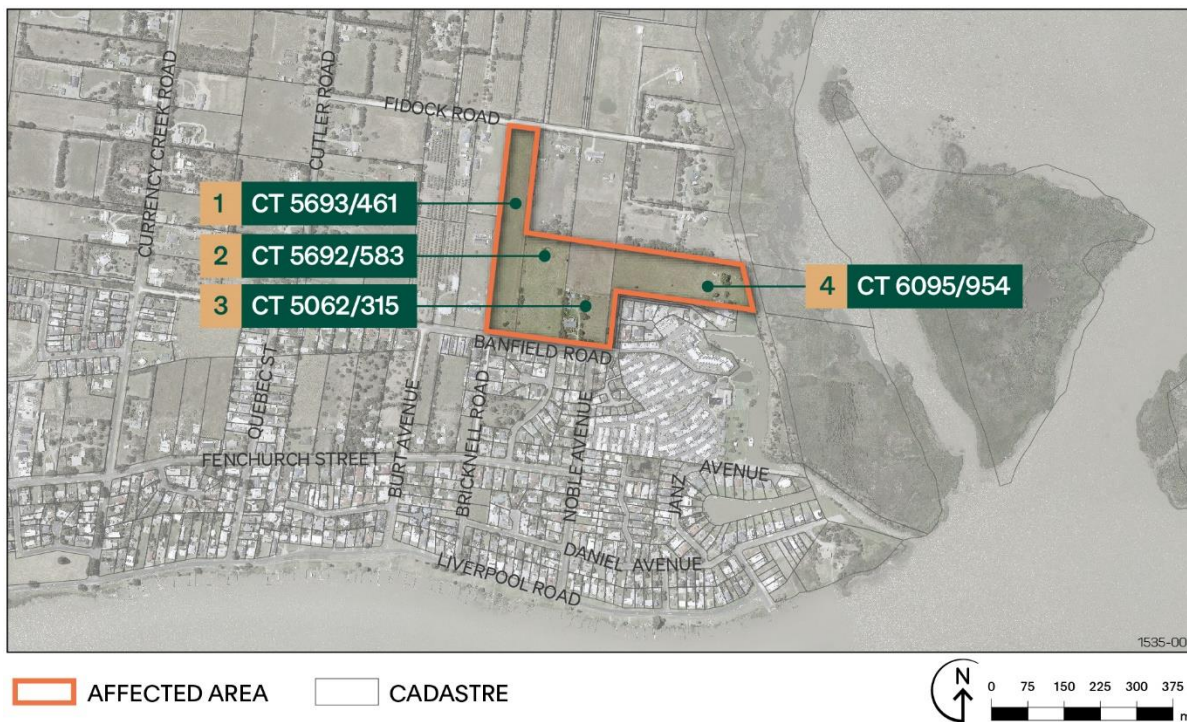


Figure 2-1 – Affected area and parcel references



## 2.2. Scope of Proposed Code Amendment

The following tables outline the current policy and intended policy for each parcel identified within the Affected Area, that will be explored through a future Code Amendment.

### Parcel 1 – 16 Banfield Road, Goolwa North (Lot 103 in DP 13542, CT 5693/461)

#### Parcel Location



#### Current Policy

##### Zone

- Rural Living

##### Subzone

Nil

##### Overlays

- Airport Building Heights (Aircraft Landing Area)
- Building Near Airfields
- Hazards (Bushfire – Medium Risk)
- Hazards (Flooding – Evidence Required)
- Murray-Darling Basin
- Native Vegetation
- River Murray Flood Plain Protection Area

##### Local Variations (TNVs)

- Minimum site area is 1 hectare

#### Amendment Outline

The objective for the Code Amendment is rezone land to facilitate the expansion of the neighbouring Residential Park development, providing additional affordable housing and associated facilities for over 50's.

## Intended Policy

### Zone

- Rural Living (northern portion - unchanged)
- Residential Park (southern portion)

### Subzone

Nil

### Overlays

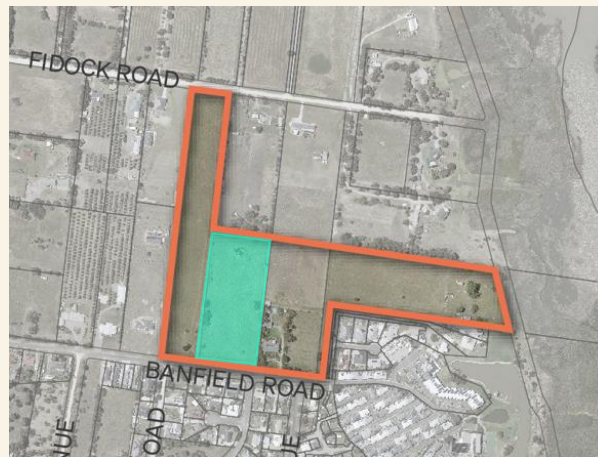
- Airport Building Heights (Aircraft Landing Area)
- Building Near Airfields
- Hazards (Bushfire – Medium Risk)
- Hazards (Flooding – Evidence Required)
- Murray-Darling Basin
- Native Vegetation
- River Murray Flood Plain Protection Area

### Local Variations (TNVs)

- Investigate the introduction of a Concept Plan (if required)

## Parcel 2 – 12 Banfield Road, Goolwa North (Lot 106 in DP 13542, CT 5692/583)

### Parcel Location



<p><b>Current Policy</b></p>	<p><b>Zone</b></p> <ul style="list-style-type: none"> <li>• Rural Living</li> </ul> <p><b>Subzone</b></p> <p>Nil</p> <p><b>Overlays</b></p> <ul style="list-style-type: none"> <li>• Airport Building Heights (Aircraft Landing Area)</li> <li>• Building Near Airfields</li> <li>• Hazards (Bushfire – Medium Risk)</li> <li>• Hazards (Flooding – Evidence Required)</li> <li>• Murray-Darling Basin</li> <li>• Native Vegetation</li> <li>• River Murray Flood Plain Protection Area</li> </ul> <p><b>Local Variations (TNVs)</b></p> <ul style="list-style-type: none"> <li>• Minimum site area is 1 hectare</li> </ul>
<p><b>Amendment Outline</b></p>	<p>The objective for the Code Amendment is rezone land to facilitate the expansion of the neighbouring Residential Park development, providing additional affordable housing and associated facilities for over 50's.</p>
<p><b>Intended Policy</b></p>	<p><b>Zone</b></p> <ul style="list-style-type: none"> <li>• Residential Park</li> </ul> <p><b>Subzone</b></p> <p>Nil</p> <p><b>Overlays</b></p> <ul style="list-style-type: none"> <li>• Airport Building Heights (Aircraft Landing Area)</li> <li>• Building Near Airfields</li> <li>• Hazards (Bushfire – Medium Risk)</li> <li>• Hazards (Flooding – Evidence Required)</li> <li>• Murray-Darling Basin</li> <li>• Native Vegetation</li> <li>• River Murray Flood Plain Protection Area</li> </ul> <p><b>Local Variations (TNVs)</b></p> <ul style="list-style-type: none"> <li>• Investigate the introduction of a Concept Plan (if required)</li> </ul>



**Parcel 3 – 6-8 Banfield Road, Goolwa North (Lot 107 in DP 13542, CT 5062/315)**

**Parcel Location**



**Current Policy**

**Zone**

- Rural Living

**Subzone**

Nil

**Overlays**

- Airport Building Heights (Aircraft Landing Area)
- Building Near Airfields
- Hazards (Bushfire – Medium Risk)
- Hazards (Flooding – Evidence Required)
- Murray-Darling Basin
- Native Vegetation
- River Murray Flood Plain Protection Area

**Local Variations (TNVs)**

- Minimum site area is 1 hectare

**Amendment Outline**

The objective for the Code Amendment is rezone land to facilitate the expansion of the neighbouring Residential Park development, providing additional affordable housing and associated facilities for over 50's.

## Intended Policy

### Zone

- Residential Park

### Subzone

Nil

### Overlays

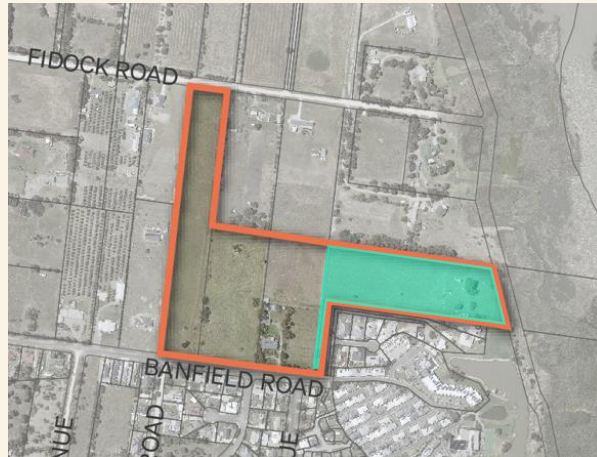
- Airport Building Heights (Aircraft Landing Area)
- Building Near Airfields
- Hazards (Bushfire – Medium Risk)
- Hazards (Flooding – Evidence Required)
- Murray-Darling Basin
- Native Vegetation
- River Murray Flood Plain Protection Area

### Local Variations (TNVs)

- Investigate the introduction of a Concept Plan (if required)

**Parcel 4 – 4 Banfield Road, Goolwa North (Lot 54 in DP89165, CT 6095/954)**

**Parcel Location**



**Current Policy**

**Zone**

- Conservation
- Rural Living

**Subzone**

- Visitor Experience (applies to Conservation Zone only)

**Overlays**

- Environment and Food Production Area
- Hazards (Bushfire – Medium Risk)
- Hazards (Bushfire – Urban Interface)
- Hazards (Flooding – Evidence Required)
- Murray-Darling Basin
- Native Vegetation
- River Murray Flood Plain Protection Area
- Water Resources

**Local Variations (TNVs)**

- Minimum site area is 1 hectare

**Amendment Outline**

The objective for the Code Amendment is rezone land to facilitate the expansion of the neighbouring Residential Park development, providing additional affordable housing and associated facilities for over 50's.

**Intended Policy**

**Zone**

- Conservation (unchanged)
- Residential Park (replacing Rural Living portion)

**Subzone**

- Visitor Experience (unchanged)

**Overlays**

- Environment and Food Production Area
- Hazards (Bushfire – Medium Risk)
- Hazards (Bushfire – Urban Interface)
- Hazards (Flooding – Evidence Required)
- Murray-Darling Basin
- Native Vegetation
- River Murray Flood Plain Protection Area
- Water Resources

**Local Variations (TNVs)**

- Investigate the introduction of a Concept Plan (if required)

### 3. STRATEGIC PLANNING OUTCOMES

Proposed Code Amendments occur within a State, regional and local strategic setting, which includes:

- State Planning Policies (SPPs);
- Regional Plans; and
- Other relevant strategic documents.

#### 3.1. Alignment with State Planning Policies

The State Planning Policies (SPPs) set out the State’s overarching goals and requirements for the planning system. Under section 66(3)(f) of the Act, the Code must comply with any principle prescribed by a SPP.

The Code Amendment should be initiated because the strategic planning outcomes sought to be achieved through the Code Amendment align with or seek to implement the following SPPs:

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
<p><b>SPP1 – Integrated Planning</b></p> <p>Objective: To apply the principles of integrated planning (Figure 2) to shape cities and regions in a way that enhances our livability, economic prosperity and sustainable future.</p> <p>Key relevant policies include:</p> <p>1.1 An adequate supply of land (well serviced by infrastructure) is available that can accommodate housing and employment growth over the relevant forecast period.</p> <p>1.2 Provide an orderly sequence of land development that enables the cost-effective and timely delivery of infrastructure investment commensurate with the rate of future population growth.</p>	<p>SPP1 identifies that the integrated planning of land use, transport and infrastructure helps to address longer term challenges and opportunities by working towards a common vision. This Policy identifies that in places where space is highly contested, integrated planning can enable multiple benefits over a limited area.</p> <p>The Code Amendment will seek to rezone some 9 hectares of land to facilitate the development of affordable accommodation for people (including retirees) over 50, forming an expansion of the existing Lakeside Goolwa Residential Park. The proposal will provide additional housing with associated supporting facilities that will be shared and integrated with the existing Lakeside Goolwa Residential Park, that will meet the needs of an ageing population.</p> <p>The Affected Area is well located to the north of the Goolwa township, adjoining an established residential area and existing Residential Park. The proposed rezoning forms a logical extension to the existing residential neighbourhood and Residential Park Zone, enabling development of a similar nature to that already present within the locality.</p> <p>In addition, the supply of alternative accommodation within Goolwa, will contribute to unlocking existing housing supply given a large portion of Lakeside Goolwa residents have typically sold their existing</p>

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
	<p>dwelling to access equity that is used to build their new Residential Park dwelling, and create a 'nest egg' for their retirement.</p> <p>The Code Amendment will follow the principles of good planning, more particularly:</p> <p>'Balanced decision-making' through the consideration of multiple perspectives in determining a policy framework which supports the most appropriate development for the site and locality.</p> <p>'Intergenerational' by supporting the improved provision of community services to meet the needs of current and future generations and considering changing societal trends and expectations for community/health services.</p> <p>'Supporting population growth' by increasing the convenience and liveability of the wider locality through the provision of employment opportunities and community/health services. This therefore supports infill development in existing, established areas, as desired by the State Planning Policies.</p>
<p><b>SPP 4 – Biodiversity</b></p> <p>Objective: To maintain and improve our state's biodiversity and its life supporting functions.</p> <p>5.5 Avoid development in hazard prone areas or, where unavoidable, ensure risks to people and property are mitigated to an acceptable or tolerable level through cost effective measures.</p>	<p>The proposed Code Amendment will not result in the rezoning of land comprising recognised high value biodiversity characteristics, and it is anticipated that the policy framework covering the eastern portion of the Affected Area abutting Currency Creek, and zoned Conservation (and within the Environmental Food Protection Area) will not be amended, therefore protecting the natural character and habitat of the at this interface.</p> <p>The future development of the Affected Area is unlikely to result in the modification or clearance of land that is not otherwise significantly altered.</p>
<p><b>SPP 5 – Climate Change</b></p> <p>Objective: Provide for development that is climate ready so that our economy, communities and environment will be resilient to climate change impacts.</p>	<p>As mentioned above, the policy framework that applies to the portion of the Affected Area along the waterfront (zoned Conservation) will not be amended through the proposed rezoning.</p> <p>The Affected Area is within the River Murray Flood Plain Protection Area Overlay and is also subject to general bushfire and flood risk. Further Investigations will therefore be undertaken through the Code Amendment to identify and mitigate these risks (if required).</p>

## State Planning Policy (SPP)

## Code Amendment Alignment with SPPs

### SPP 6 – Housing Supply and Diversity

Objective:

To promote the development of a well-serviced and sustainable housing and land choices where and when required.

6.1 A well-designed, diverse and affordable housing supply that responds to population growth and projections and the evolving demographic, social, cultural and lifestyle needs of our current and future communities

6.3 Develop healthy neighbourhoods that include diverse housing options; enable access to local shops, community facilities and infrastructure; promote active travel and public transport use; and provide quality open space, recreation and sporting facilities.

6.4 The growth of regional centres and towns within the existing footprint or outside towns where there is demonstrated demand and the land is serviced with infrastructure.

6.6 A diverse range of housing types within residential areas that provide choice for different household types, life stages and lifestyle choices.

The Code Amendment will improve land available for housing, and will enable the delivery of affordable housing targeted at over 50's, responding to the population growth, demographics and housing needs of the area.

The Affected Area is suitably located within the Goolwa township, providing future residents with access to a range of existing retail and community facilities within the town centre and surrounds.

The Residential Park will provide integrated open space and recreation facilities for residents, whilst taking advantage of the site's location in a region that is well known for its beaches, water sports and natural character.

The expansion of the existing Residential Park will contribute to the diversity of housing types available within Goolwa, and in particular will provide additional housing and lifestyle choice for over 50's.

### SPP 8 – Primary Industry

Objective:

A diverse and dynamic primary industry sector making the best use of natural and human assets.

8.4 Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.

The Affected Area comprises a number of existing 'rural living' allotments (some vacant) that are not used for primary production purposes or horticultural activities, which exist further to the east, albeit are of a small scale.

The land and surrounds are generally within Rural Living, Neighbourhood, Tourism Development, Residential Park or Conservation Zones, significantly limiting opportunities for significant primary production uses.

The portion of the Affected Area within the Environment and Food Production Area (EFPA) will not be amended through the Code Amendment. It is noted that the context of the Affected Area the EFPA



State Planning Policy (SPP)	Code Amendment Alignment with SPPs
	protects the significant environmental asset (the River Murray environs), as opposed to food production land.
<p><b>SPP 14 – Water Security &amp; Quality</b></p> <p>Objective: To ensure South Australia’s water supply is able to support the needs of current and future generations.</p> <p>14.6 Support development that does not adversely impact on water quality.</p>	<p>Stormwater (and Water Quality) investigations will be undertaken as part of the Code Amendment to ensure that the potential impacts of future development on the waterway (Currency Creek/River Murray) can be mitigated.</p>
<p><b>SPP 15 – Natural Hazards</b></p> <p>Objective: To build the resilience of communities, development and infrastructure from the adverse impacts of natural hazards.</p> <p>15.1 Identify and minimise the risk to people, property and the environment from exposure to natural hazards including extreme heat events, bushfire; terrestrial and coastal flooding; soil erosion; drought; dune drift; acid sulfate soils; including taking into account the impacts of climate change.</p>	<p>The Affected Area is affected by the Flooding (Evidence Required) and Bushfire (Medium Risk) Overlays, providing clear guidance on matters relating to natural hazards. A future Residential Park development will be subject to the General provisions of the Code that seek to minimise risk to property, people and the environment.</p> <p>Further investigations will be undertaken to identify the extent of risk and interface management measures.</p>

### 3.2. Alignment with Regional Plans

As with the SPPs, the directions set out in Regional Plans provide the long-term vision as well as setting the spatial patterns for future development in a region. This includes consideration of land use integration, transport infrastructure and the public realm.

The ‘30 Year Plan for Greater Adelaide (2017 update)’ volume of the Planning Strategy is relevant for this Code Amendment.

**Regional Plan Identified Priorities or Targets    Code Amendment Alignment with Regional Plan**

**Transit Corridors, growth areas and activity centres**

P11 Ensure new urban fringe growth occurs only within designated urban areas and township boundaries and outside the Environment and Food Production Areas, as shown on Map 3.

P12 Ensure, where possible, that new growth areas on the metropolitan Adelaide fringe and in townships are connected to, and make efficient use of, existing infrastructure, thereby discouraging “leapfrog” urban development.

The Affected Area is within the “Planned Urban Lands to 2045” boundary of the Goolwa township, as identified in Map 3 – ‘Designated urban areas and township boundaries’.



The Affected Area is within the Goolwa township and will utilise the existing infrastructure and services within the town, and adjoins an existing established residential area and existing Residential Park. The portion of the Affected Area that is within the Environment and Food Production area, abutting Currency Creek, will be preserved.

**Design Quality**

P26 Develop and promote a distinctive and innovative range of building typologies for residential housing which responds to metropolitan Adelaide’s changing housing needs, reflects its character and climate, and provides a diversity of price points.

P29. Encourage development that positively contributes to the public realm by ensuring compatibility with its surrounding context and provides active interfaces with streets and public open spaces.

P30 Support the characteristics and identities of different neighbourhoods, suburbs and precincts by ensuring development considers context, location and place.

P31 Recognise the unique character of areas by identifying their valued physical attributes.

The Code Amendment will facilitate the expansion of the existing Lakeside Goolwa Residential Park, contributing to a providing a range of housing typologies and price points within the locality and Goolwa township.

The Code Amendment will seek to provide a policy framework that supports the important existing character attributes of the area, particularly in relation to the preservation of the Currency Creek/River Murray and environs, to conserve and enhance its environmental and biodiversity attributes and value to the community as a public recreation area.

**Regional Plan Identified Priorities or Targets    Code Amendment Alignment with Regional Plan**

**Housing mix, affordability and competitiveness**

P37 Facilitate a diverse range of housing types and tenures (including affordable housing) through increased policy flexibility in residential and mixed-use areas...

P42 Provide for the integration of affordable housing with other housing to help build social capital.

The Code Amendment seeks to enable the expansion of the existing Lakeside Goolwa Residential Park, providing an affordable housing option, choice for different household types, life stages and lifestyle choices within the Goolwa township and integrated with the existing established residential area.

**Health, wellbeing and inclusion**

P47 Plan future suburbs and regenerate and renew existing ones to be healthy neighbourhoods that include:

- diverse housing options that support affordability
- access to local shops, community services and facilities
- access to fresh food and a range of food services
- safe cycling and pedestrian friendly streets that are tree-lined for comfort and amenity
- diverse areas of quality public open space (including local parks, community gardens and playgrounds)
- sporting and recreation facilities
- walkable connections to public transport and community infrastructure

The Code Amendment seeks to deliver a zoning outcome that facilitates the expansion of an existing Residential Park, that will provide a diversity of price points, housing options and lifestyle choice, catering to a growing demographic.

The Residential Park Zone seeks the provision of communal recreation areas and facilities to support the needs and enjoyment of residents and visitors, within an open, landscaped setting underpinned by pedestrian connectivity. Residents will have access to the local shops, community services and facilities within the established Goolwa township.

**Biodiversity**

P90. Delineate and maintain areas with significant environmental values to protect landscape health; conserve biodiversity; and improve development certainty and transparency (represented in Map 10). This includes:

**Nature Protection Areas:** These are largely undeveloped areas that retain significant environmental values recognised through existing legislation. This includes protected public lands (such as conservation and marine parks), private protected lands (such as Heritage Agreements),

The Affected Area adjoins an area identified in Map 10 as a “Nature Protection Area” – the River Murray/Currency Creek abutting the site to the east.

**Regional Plan Identified Priorities or Targets      Code Amendment Alignment with Regional Plan**

and areas of native vegetation and listed wetlands. These areas should be protected from development unless specific exemptions apply.



The Code Amendment seeks to retain and protect this area of significant environmental value.

**Water**

P115 Incorporate water-sensitive urban design in new developments to manage water quality, water quantity and water use efficiency and to support public stormwater systems.

The River Murray Flood Plain Protection Area and Water Resources Overlays that apply to the Affected Area and provide guidance on matters related to water quality, use and management.

P117 Increase the provision of stormwater infrastructure (including water sensitive urban design) to manage and reduce the impacts of:

Engineering investigations will be undertaken to ensure that the proposed Residential Park development will not be contrary to the relevant water policies of the Code.

- run-off from infill development
- urban flooding from increased short duration intense rainfall events associated with climate change pollution from roads and other developed areas.

### 3.3.Alignment with Other Relevant Documents

Additional documents may relate to the broader land use intent within the scope of this proposed Code Amendment (or directly to the Affected Area) and therefore are identified for consideration in the preparation of the Code Amendment.

The following table identifies other documents relevant to the proposed Code Amendment:

Other Relevant Documents	Code Amendment Alignment with Other Relevant Document
<p><b>Strategic Management Plan Alexandrina 2040 (Alexandrina Council)</b></p>	<p>The Strategic Plan identifies a number of key indicators that are relevant to this Code Amendment, including:</p> <ul style="list-style-type: none"> <li><b>Liveable</b> – distinctive villages, places, spaces and transport networks to support active lifestyles, vibrant cultures and productive enterprise</li> <li><b>Green</b> – nature is valued and resources are managed sustainably</li> <li><b>Connected</b> – safe, healthy and enjoy accessible infrastructure and services.</li> </ul> <p>The Code Amendment will investigate the suitability of the Affected Area for residential purposes, with the Residential Park Zone supporting the creation of an urban village supporting active lifestyles, connected to existing infrastructure and services within the Goolwa township, and maintaining existing high value environmental attributes.</p> <p>The Code Amendment is aligned with the direction contained within Council's Strategic Plan.</p>
<p><b>Economic Development Strategy 2022 – 2027 (Alexandrina Council)</b></p>	<p>The Economic Development Strategy is focussed on a sustainable economic growth philosophy based on the concept of regenerative economics, building a sustainable economy that meets the needs of people and the environment.</p> <p>The Strategy identifies four key action areas:</p> <ol style="list-style-type: none"> <li>1. Leadership and advocacy</li> <li>2. Investment attraction</li> <li>3. Town building</li> <li>4. Business and industry development</li> </ol> <p>The Code Amendment is aligned with these action areas, as it will support and facilitate the expansion of an existing business (a Residential Park), encouraging investment in the region and enabling population growth that will in turn support local businesses, particularly in the existing Goolwa township.</p>

## Other Relevant Documents

## Code Amendment Alignment with Other Relevant Document

### Southern and Hills LGA Regional Public Health and Wellbeing Plan 2022-2027

The Regional Public Health Plan (RPHP) for the Southern and Hills Region is a collaboration between the six Council constituents of the Southern and Hills Local Government Association, including Alexandrina Council. The Plan supports public health and wellbeing as a key priority, recognising that the health and wellbeing of individuals and communities are influenced by social, economic, political, cultural and environmental factors. The Plan's vision is "Healthy, liveable, connected and resilient communities for all".

Whilst the focus of the Plan is on public health planning to address the needs of the population, it recognises the following population and demographic characteristics that are relevant to the Code Amendment and the Alexandrina LGA:

- An aging population, with high numbers of Age Pension recipients;
- High population growth;
- High levels of housing stress (mortgage and rental);
- Fewer social housing dwellings available for rent;
- Decline in volunteering (but reliance on a volunteer base for essential roles that contribute to community health and wellbeing).

The Code Amendment enables the expansion of a Residential Park that will provide additional affordable housing for older residents, enabling existing residents of Goolwa to 'age in place', with integrated facilities (including indoor recreation and outdoor facilities and open space) that supports community building and resident health and wellbeing. The Code Amendment aligns with the following Goals of the Plan, particularly:

- Promote: Stronger Communities and Healthier Environments
- Prepare: Communities are aware of and responding to the health risks of climate change
- Prevent: Communities are empowered for healthy living

## 4. INVESTIGATIONS AND ENGAGEMENT

### 4.1. Investigations Already Undertaken

The following investigations have been undertaken to support the initiation of the Code Amendment.

Investigations Undertaken	Scope of Investigations	Summary of Outcome of Investigations
Civil Infrastructure Investigations	<p>Greenhill Engineers have undertaken preliminary investigations of the existing service infrastructure to inform the preparation of the Code Amendment.</p> <p>This advice is provided in <b>Appendix C</b> and summarised below.</p>	
	<b>Stormwater</b>	<ul style="list-style-type: none"> <li>• The majority of stormwater runoff from development of the subject site will require stormwater drainage and stormwater management systems to enable stormwater runoff to be retained and detained on-site, with outflow directed to the existing Lakeside Goolwa site and Marina.</li> <li>• A combination of underground stormwater drainage pit and pipe systems, vegetated swales and a stormwater pond system or wetland will be required to meet the recommended stormwater drainage standards and Water Sensitive Urban Design (WSUD) objectives.</li> <li>• The inclusion of rainwater tanks incorporated into a development of the subject site will enable capture and reuse of stormwater on-site, and contribute meeting the WSUD outcomes as well as reducing potable water demand.</li> <li>• Apart from contributing to the management of stormwater, a vegetated swale or waterway is required because of the</li> </ul>



Investigations Undertaken	Scope of Investigations	Summary of Outcome of Investigations
		<p>existing site topography and the need to direct stormwater runoff to the east, to the Marina and Currency Creek.</p>
	<p><b>Wastewater Management</b></p>	<ul style="list-style-type: none"> <li>• There is an existing community wastewater management scheme under the care control and management of Alexandrina Council, that services properties in the area including the existing Banfield Road area and the Lakeside Goolwa Residential Park.</li> <li>• From enquiry with Alexandrina Council, we understand the existing vacuum sewer system is expected to have adequate capacity to service a development of the site, subject to a review of the existing Vacuum Sewer Masterplan.</li> </ul>
	<p><b>Potable Water Supply</b></p>	<ul style="list-style-type: none"> <li>• There is an existing SA Water 100 mm diameter potable water main network in Banfield Road and adjoining roads. The existing network is connected to larger SA Water potable water mains (200 mm diameter and 150 mm diameter) in Fenchurch Street.</li> <li>• The existing potable water network will allow connection for potable water supply, but will require review of the capacity of the network to serve the subject site by SA Water, and works to augment the existing system may be required.</li> </ul>
	<p><b>Electrical Supply</b></p>	<ul style="list-style-type: none"> <li>• There is existing 11 KV high voltage (HV) overhead and underground power line in Banfield Road and Fidock Road.</li> <li>• The existing HV network will allow connection, and an extension of the</li> </ul>

Investigations Undertaken	Scope of Investigations	Summary of Outcome of Investigations
		<p>existing high voltage network would be required to serve the subject site, most likely including a HV tie between the Banfield Road and Fidock Road power lines. SAPN review of their existing network and assessment of any proposed development will be required to confirm.</p>
	<p><b>Telecommunications Supply</b></p>	<ul style="list-style-type: none"> <li>• There is existing telecommunications infrastructure along Fidock Road and Banfield Road.</li> <li>• That should enable telecommunications connection for the subject site, subject to assessment and meeting with the requirements of the service provider.</li> </ul>
	<p><b>Gas Supply</b></p>	<ul style="list-style-type: none"> <li>• There is no existing gas infrastructure serving Goolwa North.</li> </ul>

## 4.2. Further Investigation Proposed

In addition to the investigations already undertaken and identified above, the table below outlines the additional investigations that will be undertaken to support the Code Amendment.

Further Investigations Proposed	Explanation of how the further investigations propose to address an identified issue or question
Survey	Analysis of site boundaries, easements, encumbrances as well as site features and levels etc.
Cultural Heritage	Conduct a search of the Aboriginal Heritage Registers to identify relevant Aboriginal heritage considerations, including any identified cultural sites and objects.
Land Use Interface Management	<p>Review the suitability of existing Code policy to successfully manage potential interface conflicts between existing sensitive land uses and areas of high environmental value in the locality and the proposed Residential Park land use that may be established within the Affected Area.</p> <p>Matters to be considered include:</p> <ul style="list-style-type: none"> <li>• The design, character and visual appearance of buildings;</li> <li>• The height, bulk, scale and visual impact of buildings;</li> <li>• Building setback in relation to surrounding land; and</li> <li>• Acoustic considerations for future Residential Park residents, particularly from surrounding rural land uses</li> </ul>
Bushfire Assessment	<p>Review the classification of vegetation at the interfaces of the Affected Area, and undertake a hazard assessment with reference to classified vegetation outside of the Affected Area.</p> <p>The assessment will determine whether the relevant bushfire overlays applicable to the Affected Area should be amended.</p>
Native Vegetation and Biodiversity	A Flora and Fauna Assessment of the Affected Area will be undertaken to assess whether any native vegetation or threatened species exist on site, in accordance with the requirements of the Native Vegetation Act 1991 and Native Vegetation Regulations 2017.

Further Investigations Proposed	Explanation of how the further investigations propose to address an identified issue or question
Flooding, Hydrology and Stormwater	<p>Investigate any potential stormwater and flood constraints affecting the land and implications on the potential application of the Residential Park Zone to the Affected Area (where relevant).</p> <p>Investigations will include a review of the ‘Hazards (Flooding – Evidence Required) Overlay’ applicable to the Affected Area.</p>
Transport & Access	<p>Investigate the traffic and transport implications of the Code Amendment. Traffic investigations will be undertaken to assess:</p> <ul style="list-style-type: none"> <li>• the potential traffic generation associated with the proposed rezoning and redevelopment of the subject land for a Residential Park</li> <li>• potential parking demands associated with the proposed Residential Park</li> <li>• the associated impact on the adjacent existing road network</li> <li>• any anticipated road or access upgrades required</li> <li>• potential pedestrian and cycling linkages</li> </ul>
Site Contamination	<p>A Preliminary Site Analysis will be undertaken to determine the likelihood of contamination, and whether any further investigations or measures are required to remediate the land so that it is suitable for the proposed residential use (as a more sensitive use is proposed).</p>
GIS	<p>Preparation of required spatial mapping for inclusion within the Planning and Design Code.</p>

## 4.3. Engagement Already Undertaken

### 4.3.1. ALEXANDRINA COUNCIL

In accordance with ‘Practice Direction 2 – Preparation and Amendment of Designated Instruments’, the proponent and its representatives have liaised with senior representatives the Alexandrina Council concerning the proposed Code Amendment.

On the 3 July 2023, the proponent and representatives of Ekistics met with Senior Administration of Alexandrina Council regarding the proposed initiation of a Code Amendment to rezone the Affected Area to a ‘Residential Park Zone’.



Following this meeting, on 10 July 2023, a formal letter was sent to Council’s Chief Executive Officer outlining the intended Proposal to Initiate a Code Amendment, the Affected Area extent (which was later amended and communicated to Council, refer below), and the level of detailed investigations intended to be undertaken as part of the future Code Amendment. This letter also formally requested a written response from Council’s Chief Executive Officer. A copy of the letter can be found at Appendix D.

On the 15 August 2023, a follow up email was issued to Council’s Chief Executive Officer outlining that the Affected Area had been amended to exclude the following parcels: 64 Fidock Road, Goolwa North (Lot 103 in DP 13542, CT 5693/461); 66 Fidock Road, Goolwa North (Lot 30 in DP 130209, CT 6277/190); and, 78 Fidock Road, Goolwa North (Lot 31 in DP 130209, CT 6277/191). A copy of this email correspondence can be found at Appendix D.

On the time of writing of this Proposal to Initiate, a formal response is yet to be received. However, recent communication with Alexandrina Council administration indicated that this response is imminent, and will be provided under separate cover by the Designated Entity.

## 4.4. Further Engagement Proposed

In addition to the engagement already undertaken and identified above, the table below outlines the additional engagement that will be undertaken to support the Code Amendment.

Further Engagement Proposed	Explanation of how the further engagement propose to address an identified issue or question
Alexandrina Council	Additional engagement will be undertaken with Council in relation to the Code Amendment. The purpose of this additional engagement will be to identify and resolve planning matters of local significance to the Council and its local community.
Neighbouring land owners and occupiers, and key stakeholders	<p>The Proponent will comply with the Community Engagement Charter for the purposes of consultation in relation to the Code Amendment process.</p> <p>A detailed Engagement Plan will be prepared following initiation of the Code Amendment, however we anticipate the following consultation scope as an example:</p> <ul style="list-style-type: none"> <li>• Taa Wika (Registered Aboriginal Party)</li> <li>• Direct letters to affected landowners/owner occupiers;</li> <li>• Preparation of communication and publication documents for the PlanSA Portal;</li> <li>• Preparation of a Fact Sheet to be made available at Council’s Civic Centres, Libraries and other relevant locations;</li> <li>• Information session/s for local resident/property owners;</li> </ul>

Further Engagement Proposed	Explanation of how the further engagement propose to address an identified issue or question
	<ul style="list-style-type: none"> <li>• Briefing of Council staff/Elected Members (if required); and</li> <li>• Letter/email to the Local and State Members of Parliament.</li> </ul>
Key State Agencies	<p>Engagement with the following State Agencies and service provides may also be required to identify key planning and environmental considerations as well as servicing and augmentation requirements relating to the Code Amendment:</p> <ul style="list-style-type: none"> <li>• Department for Trade and Investment – Planning and Land Use Services (planning considerations)</li> <li>• Department for Infrastructure and Transport (traffic and access considerations)</li> <li>• Department for Environment and Water (flooding and interface with Currency Creek considerations)</li> <li>• South Australian Environment Protection Agency (site contamination considerations)</li> <li>• SA Water (potable water and sewer)</li> <li>• NBN Co, Nextgen and Optus (telecommunications)</li> <li>• SA Power Networks (electrical)</li> </ul>

## 5. CODE AMENDMENT PROCESS

### 5.1. Engagement Plan

The Code Amendment process will occur in accordance with the 'Community Engagement Charter' and 'Practice Direction 2 – Consultation on the Preparation or Amendment of a Designated Instrument'.

The Designated Entity will prepare an Engagement Plan prior to the commencement of engagement on the proposed Code Amendment. The Engagement Plan will include the following mandatory consultation requirements (which may be in addition to the engagement outlined in this Proposal to Initiate):

The Local Government Association must be notified in writing of the proposed Code Amendment.

If the Code Amendment has a specific impact on 1 or more particular pieces of land in a particular zone or subzone (rather than more generally), the Designated Entity must take reasonable steps to give a notice in accordance with Regulation 20 of the Planning, Development and Infrastructure (General) Regulations 2017, to:

- the owners or occupiers of the land; and
- owners or occupiers of each piece of adjacent land

Consultation must also occur with any person or body specified by the State Planning Commission under section 73(6)(e) of the Act.

### 5.2. Engagement Report

Once engagement on the Code Amendment is complete, the Designated Entity will prepare an Engagement Report under Section 73(7) of the Act.

The Designated Entity must ensure that a copy of the Engagement Report is provided to the Minister and also published on the PlanSA portal. This will occur in accordance with Practice Direction 2.

The Engagement Plan and the Engagement Report will also be considered by the State Planning Commission during the final stages of the Code Amendment process. The Commission will provide a report to the Environment, Resources and Development Committee of Parliament under Section 74(3) of the Act. The Commission's report will provide information about the reason for the Code Amendment, the consultation undertaken on the Code Amendment and any other information considered relevant by the Commission.

### 5.3. Code Amendment Timetable

The Proponent (where it is also the Designated Entity) commits to undertaking the Code Amendment in line with the timeframe outlined Appendix B. If a timeframe is exceeded (or expected to be exceeded) the Proponent agrees to provide an amended timetable to the Department with an explanation of the delay, for approval by the Minister of an extension of time for the Code Amendment.



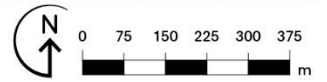
## APPENDIX A

### Map of Affected Area

Appendix A – Map of Affected Area



 AFFECTED AREA       CADASTRE







**APPENDIX B**  
**Timetable for Code  
Amendment by Proponent**

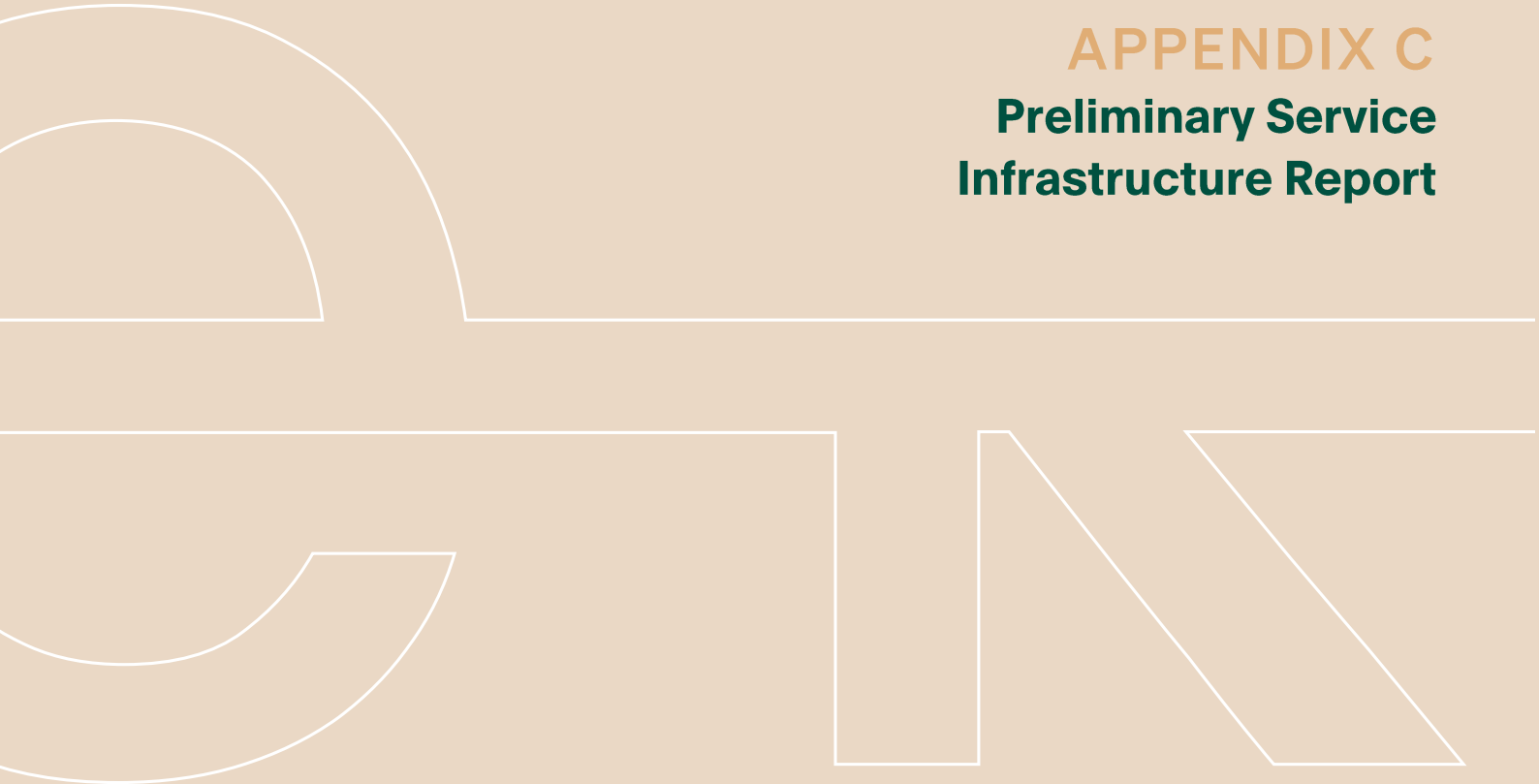
## Timetable for Code Amendment by Proponent

Step	Responsibility	Timeframes
<b>Approval of the Proposal to Initiate</b>		
Review of Proposal to Initiate to confirm all mandatory requirements are met (timeframe will be put on hold if further information is required). Referral to the Minister to request advice from the Commission.	AGD	2 weeks (includes lodgement and allocation + referral to Government Agencies within the first week)
Minister requests advice from the Commission.	Minister	2 weeks
Referral to Government Agencies for comment (where necessary).	AGD, Relevant Government Agencies	+ 2 weeks
Consideration of Proposal to Initiate and advice to the Minister.	Commission (Delegate)	3 weeks
	Commission	+ 3 weeks
<b>Proposal to Initiate</b> agreed to by the Minister	Minister	2 weeks
<b>Preparation of the Code Amendment</b>		
Engagement Plan Prepared.	Designated Entity	8 weeks
Investigations conducted; <b>Code Amendment Report</b> prepared.		
The Drafting instructions and draft mapping provided to AGD.		
AGD prepares Amendment Instructions and Mapping and provides to Council for consultation purposes.	AGD	1 week
Preparation of Materials for Consultation.	Designated Entity	2 weeks
<b>Engagement on the Code Amendment</b>		

Step	Responsibility	Timeframes
Code Amendment Report released for public consultation in accordance with the Community Engagement Charter and the prepared Community Engagement Plan.	Designated Entity	Commencing in Q1 of 2024  Duration of consultation period TBD, and subject to finalisation of Engagement Plan
<b>Consideration of Engagement and Finalisation of Amendments</b>		
Submissions summarised; Amended drafting instructions provided, Engagement Report prepared and lodged with AGD.	Designated Entity	4 weeks
Assess the amendment and engagement.  Prepare report to the Commission or delegate  Timeframe will be put on hold if further information is required, or if there are unresolved issues.	AGD	4 weeks
Consideration of Advice	Commission (Delegate)	2 weeks (includes 1 week to process through Minister's office)
	Commission	+ 3 weeks
<b>Decision Process</b>		
Minister considers the Code Amendment Report and the Engagement Report and makes decision	Minister	3 weeks
<b>Implementing the Amendment (operation of the Code Amendment)</b>		
Go- Live- Publish on the PlanSA portal	AGD	2-4 weeks
<b>Parliamentary Scrutiny</b>		



Step	Responsibility	Timeframes
Referral of approved Code Amendment to ERDC	AGD	8 weeks



**APPENDIX C**  
**Preliminary Service**  
**Infrastructure Report**



22.2972

2 June, 2023

Goolwa Lifestyle Village Pty Ltd  
1 Banfield Road  
Goolwa North SA 5214

Attention: Neil Williams

Dear Neil

RE: BANFIELD ROAD &amp; FIDOCK ROAD, GOOLWA NORTH

GREENHILL have been engaged to undertake preliminary investigations of the existing services infrastructure for a proposed expansion of the existing residential park known as Lakeside Goolwa, and for reference in consideration of an initiation of Planning and Design Code Amendment. The subject land is located at Banfield Road and Fidock Road Goolwa North. The proposed expansion of the Residential Park is to create approximately 135 residential dwellings for retirement living, along with associated community facilities.

## Site Description

The site is located north of the Lakeside Goolwa Residential Park at Banfield Road, Goolwa North and east of Currency Creek with an area is approximately 9.5 hectares. Comprised of existing rural living allotments, the majority of the allotments are grasslands used for livestock. There is a single residential dwelling located at number 6 Banfield Road, as well as various other small structures, including farm sheds and rainwater tanks on the allotments. An aerial image of the site is shown below.



Figure 1 – Aerial image of Subject Land, Banfield and Fidock Roads, Goolwa North

The existing site topography is generally flat, undulating in level between about 3 m AHD and 1.5 metres AHD. Site contour information taken from Goolwa digital aerial photogrammetry is shown below to illustrate.



Figure 2 – Site Contour Plan, Goolwa North

### Infrastructure Review and Assessment

Investigations have been made to obtain information upon the existing services infrastructure and to consider its capacity to serve the site. That has included a Before-You-Dig (BYD) enquiry and review of the existing services infrastructure networks with relevant service authorities including SA Water, SAPN, NBN Co, and Alexandrina Council. A copy of the response to the BYD enquiry is attached.

The existing services and investigations undertaken are outlined as follows:

#### 1. Stormwater

- Existing stormwater drainage

There is an existing stormwater system in Noble Avenue that drains to an existing retention and detention basin, located to the south of the site at Allison Avenue. An existing stormwater side entry pit on the northern side of Banfield Road, at the junction with Noble Avenue captures road drainage and conveys stormwater via the downstream underground pipe system, which is a 450 mm diameter reinforced concrete pipe. Road surface drainage flows, from the southern side of the Banfield Road, drain via Noble Avenue to the south and downstream side entry pits, at the sag point in Noble Avenue. Stormwater flows are captured by the existing side entry pits and drain via the existing underground pipe system (525 mm diameter) to the downstream stormwater pond and basin at Allison Avenue.

Stormwater from the majority of the subject area is currently expected to runoff overland, south to Banfield Road, or to the east to Currency Creek. Minor storm events are expected to be partially retained within localised on-site depressions. During large storm events, significant overland stormwater flows may be expected to arrive at Banfield Road, or flow into Currency Creek.

The existing drainage system in Noble Avenue is anticipated to have limited stormwater drainage capacity, and does not provide a suitable outlet for a proposed development of the subject site.

The existing peak stormwater flow from the site is estimated to be in the order of 300 l/s, in the minor storm event (10% Annual Exceedance Probability (AEP)), and approximately 850 l/s. Peak flows are expected to be significantly increased and will need to be managed to prevent overloading of the existing downstream drainage systems and ensure properties are not inundated by stormwater.

The subject site is elevated above the recorded 1956 River Murray Flood level, as illustrated in the Flood Awareness map. See screenshot below.

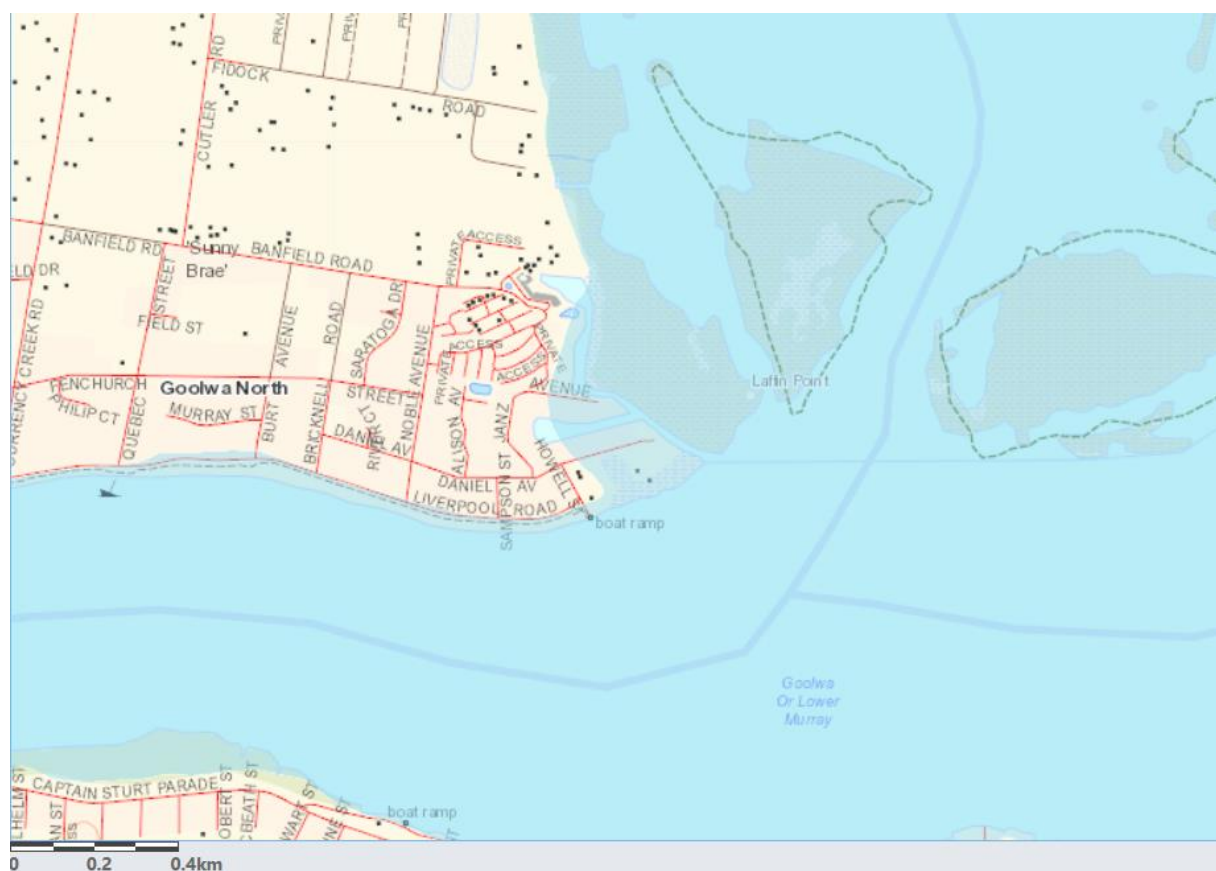


Figure 3 – Extent of recorded 1956 River Murray Flood

- Proposed Stormwater Management

The majority of stormwater runoff from a development of the subject site will require stormwater drainage and stormwater management systems to enable stormwater runoff to be retained and detained on-site, with outflow directed to the existing Lakeside Goolwa site and Marina.

A combination of underground stormwater drainage pit and pipe systems, vegetated swales and a stormwater pond system or wetland will be required to meet with the recommended stormwater drainage standards and Water Sensitive Urban Design (WSUD) objectives. It may be suitably designed to manage



minor and major storm flows, and to treat the quality of stormwater runoff to levels that are acceptable for overflow and outlet into the existing Marina.

The inclusion of rainwater tanks incorporated into a development of the subject site will enable capture and reuse of stormwater on-site, and contribute meeting the WSUD outcomes as well as reducing potable water demand.

If stormwater runoff is managed to direct flows to an outlet directly to the existing Marina, then provision of stormwater detention storage is not critical.

Apart from contributing to the management of stormwater, a vegetated swale or waterway is required because of the existing site topography and the need to direct stormwater runoff to the east, to the Marina and Currency Creek.

## 2. Wastewater Management

There is an existing community wastewater management scheme under the care control and management of Alexandrina Council, that services properties in the area including the existing Banfield Road area and the Lakeside Goolwa Residential Park.

The system is a vacuum sewer system and includes a 150 mm PVC vacuum sewer main in Banfield Road adjoining the subject site. Wastewater from the Banfield Road, Goolwa North area is served by the vacuum sewer main, which extends west, increasing in size to a 250 mm vacuum sewer main at the existing Vacuum Sewer Pump station located near the junction of Franklin Street and Banfield Road.

There is no wastewater infrastructure in Fidock Road to the north of the site. Existing rural living allotments in Fidock Road are anticipated to each have existing on-site waste water treatment system (septic tank system or equivalent).

From enquiry with Alexandrina Council, we understand the existing vacuum sewer system is expected to have adequate capacity to service a development of the site, subject to a review of the existing Vacuum Sewer Masterplan.

## 3. Potable Water Supply

There is an existing SA Water 100 mm diameter potable water main network in Banfield Road and adjoining roads. The existing network is connected to larger SA Water potable water mains (200 mm diameter and 150 mm diameter) in Fenchurch Street.

The existing potable water network will allow connection for potable water supply, but will require review of the capacity of the network to serve the subject site by SA Water, and works to augment the existing system may be required.

## 4. Electrical Supply

There is existing 11 KV high voltage (HV) overhead and underground power line in Banfield Road and Fidock Road.

The existing HV network will allow connection, and an extension of the existing high voltage network would be required to serve the subject site, most likely including a HV tie between the Banfield Road and Fidock Road power lines. SAPN review of their existing network and assessment of any proposed development will be required to confirm.

5. Telecommunications Supply

There is existing telecommunications infrastructure along Fidock Road and Banfield Road.

That should enable telecommunications connection for the subject site, subject to assessment and meeting with the requirements of the service provider.

6. Gas Supply

There is no existing gas infrastructure serving Goolwa North.

Yours sincerely,  
For GREENHILL

Dean Mathews  
Technical Director

Enc. BYD Enquiry Information





**APPENDIX D**  
**Correspondence to**  
**Alexandrina Council**

10 July 2023

Mr Nigel Morris  
Chief Executive Officer  
Alexandrina Council  
11 Cadell Street,  
GOOLWA SA 5214

Dear Mr Morris,

RE: NOTIFICATION OF INTENT TO INITIATE A CODE AMENDMENT (REZONING) IN RELATION TO LAND ADJACENT TO BANFIELD ROAD, GOOLWA NORTH

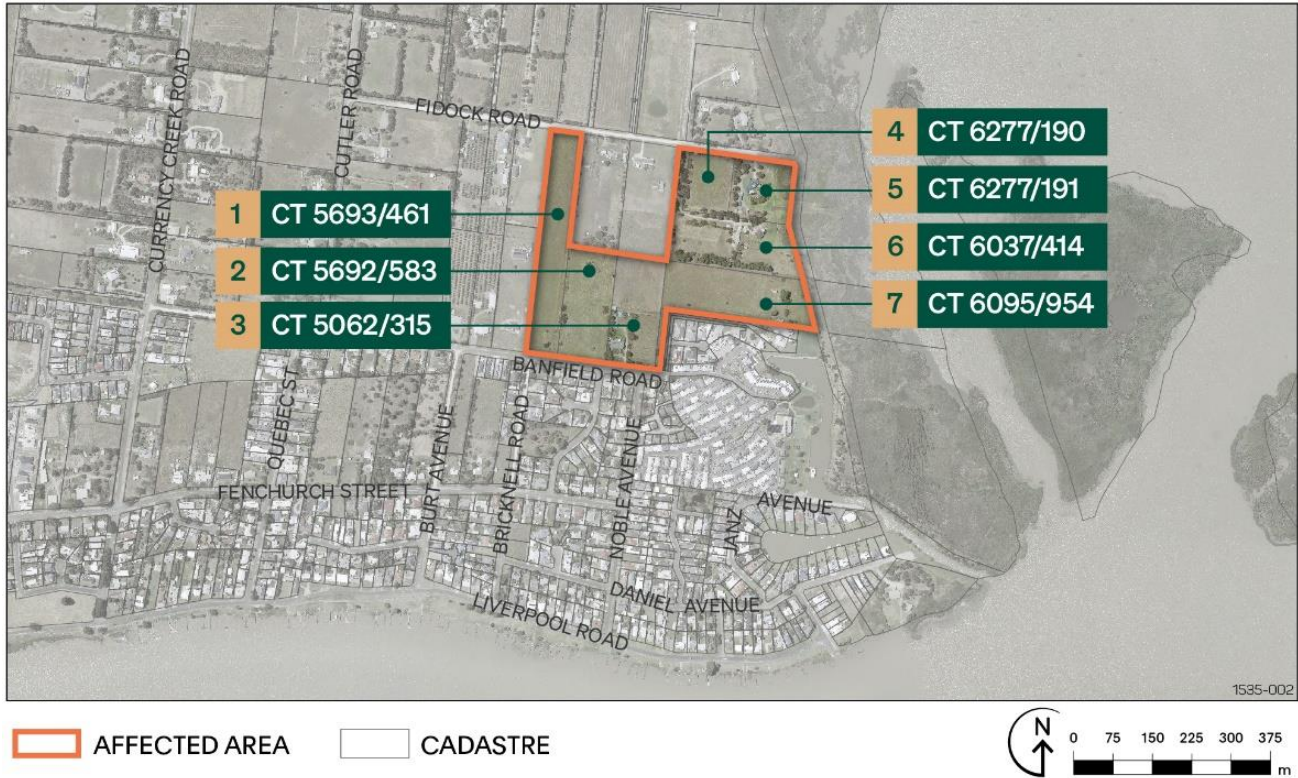
We represent 'Goolwa Tourist Resort Pty. Ltd' (the 'Designated Entity'), who own and control (or hold an agreement option over) several parcels of land situated between Banfield Road and Fidock Road, Goolwa North (the 'land'). The Designated Entity is seeking to initiate and undertake a 'proponent initiated' Code Amendment which ultimately seeks to a rezone the land, in order to facilitate the expansion of the existing and successful Lakeside Goolwa Residential Park facility located immediately to the south.

The land proposed to be rezoned through this Code Amendment process is represented spatially in **Figure 1.1** below and is more particularly described as:

1. 16 Banfield Road – Certificate of Title Volume 5693 Folio 461 – (Allotment 103 in Deposited Plan 135424);
2. 12 Banfield Road – Certificate of Title Volume 5692 Folio 583 – (Allotment 106 in Deposited Plan 13542);
3. 6-8 Banfield Road – Certificate of Title Volume 5062 Folio 315 – (Allotment 1073 in Deposited Plan 13542);
4. 66 Fidock Road – Certificate of Title Volume 6277 Folio 190 – (Allotment 30 in Deposited Plan 130209);
5. 78 Fidock Road – Certificate of Title Volume 6277 Folio 191 – (Allotment 31 in Deposited Plan 130209);
6. 64 Fidock Road – Certificate of Title Volume 6037 Folio 414 – (Allotment 4 in Deposited Plan 13607)
7. 4 Banfield Road – Certificate of Title Volume 6095 Folio 954 – (Allotment 54 in Deposited Plan 896165)

As you may be aware, on Monday 3<sup>rd</sup> July 2023 representatives from Ekistics and the Designated Entity met with Council officers at the Alexandrina Council Office, Goolwa, to discuss the history of the land and adjacent Lakeside Goolwa Residential Park facility, the current status of a number of projects in and around the land, and to provide confirmation to Council's administration of Lakeside Goolwa's intention to commence a 'proponent initiated' Code Amendment to rezone the land under the Planning, Development and Infrastructure Act 2016 (PDI Act).

Figure 1.1 Land the subject of a proposed Proponent Initiated Code Amendment



Pursuant to Section 73 of the PDI Act, and Practice Direction 2: Preparation and Amendment of a Designated Instrument, in order to initiate a Code Amendment the proponent must provide a proposal to the State Planning Commission (SPC). The proposal must cover a number of items, including demonstration that the proponent has discussed the proposal with the relevant Council.

Importantly, confirmation that Council administration have discussed the proposed rezoning with the proponent and do not object to the initiation of a Code Amendment does not constitute a form of advocacy for the rezoning, nor does it imply that Council will ultimately support the rezoning of the land.

It is recognised that if/when a Code Amendment is initiated, detailed investigations will be undertaken including preparation of the Code Amendment and associated drafting instructions for Code policy that is proposed to be introduced to the land. Community consultation and engagement would then occur (in accordance with the 'Community Engagement Charter' including the preparation of an agreed 'Engagement Plan'), which would include consultation with Alexandrina Council. Through this process Council administration and elected representatives could then form an opinion and position on the proposed Code Amendment, informed by the detailed investigations and selected policy framework proposed to apply to the land.

It is anticipated that a suite of investigations will need to be undertaken in association with the proposed Code Amendment and subject to the agreement of the Minister for Planning. We envisage that the following investigations would be required:

- Ecological Assessment
  - Evaluate the ecological considerations of the proposed rezoning on areas of environmental and biodiversity value, include assessment of native vegetation across the Affected Area;
- Traffic and Transport Impact Assessment including:
  - Investigation of the traffic and transport implications of the proposed Code Amendment, including a ‘Traffic Impact Study’ to determine the impact of the proposed Code Amendment on the surrounding transport network and to determine any infrastructure improvements that may be required (including timing and costs); and
  - Investigate/demonstrate how the proposed rezoning will support walkable neighbourhoods including potential pedestrian and cycling linkages;
- Bushfire Advice
  - To assess the level of bushfire risk applying to the Affected Area and any suggest amendments to Bushfire Overlays
- Environmental (Contamination) Assessment
  - Ensure Affected Area suitable for intended uses (noting much of Affected Area already zoned for similar or same purpose).
- Cultural Heritage Search
  - To identify relevant Aboriginal heritage considerations, including any cultural sites and objects
- Land Use Interface Investigations
  - Investigate potential interface issues relating to visual appearance, noise and/or amenity considerations, and consider policy responses required to minimise such risks;
- Flooding, Hydrology and Stormwater Investigations;
- Civil Infrastructure Investigations including:
  - Potable Water,
  - Recycled Water;
  - Wastewater;
  - Electrical;
  - Gas; and
  - Communications.

Preparation of a spatial ‘Concept Plan’ will be explored, to assist to guide the future development including key transport connections, open space networks, stormwater management, treatment of interfaces and the strategic provision of infrastructure within the Affected Area.

To assist Lakeside Goolwa with the preparation of a 'Proposal to Initiate a Planning and Design Code Amendment' for submission to the Minister for Planning, we would welcome feedback from Council's administration on the nature of investigations that are proposed to be undertaken in association with this Code Amendment including any additional investigations or analysis that may be recommended by Council in support of the proposed Code Amendment. We would also welcome advice on any existing investigations, strategies or reports that may have already been undertaken by Council (or that are proposed or scheduled to be undertaken by Council) that should be taken into consideration when initiating and preparing the proposed Code Amendment.

We thank you in anticipation of your confirmation of our recent discussions with Council's Administration in relation to this Code Amendment, confirmation that Council administration do not object to the 'initiation' of a Code Amendment and to any advice Council may offer with respect to any existing or proposed investigations, strategies or reports to inform the Code Amendment.

Please don't hesitate to contact the undersigned direct on 08 7231 0286 should you have any questions or queries or should you wish to discuss this matter further.

Kind Regards,



**Ryan Moyle**

Associate

cc Ms Kylie Weymouth – Acting Manager Strategic Development  
Mr Matthew Atkinson – Manager Development Assessment



## Ryan Moyle

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**From:** Ryan Moyle  
**Sent:** Tuesday, 15 August 2023 3:17 PM  
**To:** Nigel Morris  
**Cc:** Matt Atkinson; Kylie Weymouth; Catherine Orford  
**Subject:** ATTN Mr Nigel Morris - Modification to Affected Area - Intent to Initiate a Code Amendment (Rezoning) - Banfield Road and Fidock Road, Goolwa North

Dear Mr Morris,

Further to our formal letter dated 10 July 2023 outlining the details around the intention to prepare and submit a 'Proposal to Initiate a Code Amendment' for 4-16 Banfield Road, Goolwa North, the purpose of this email is to inform Council of a proposed change to the 'Affected Area' for the proposed Code Amendment.

As you are aware, we act for the proponent, 'Goolwa Tourist Resort Pty Ltd', who currently own and/or control the land at 4-16 Banfield Road, Goolwa North, and who are the proposed 'Designated Entity' for the Code Amendment.

The proponent has determined to remove the following land parcels that originally formed part of the Affected Area:

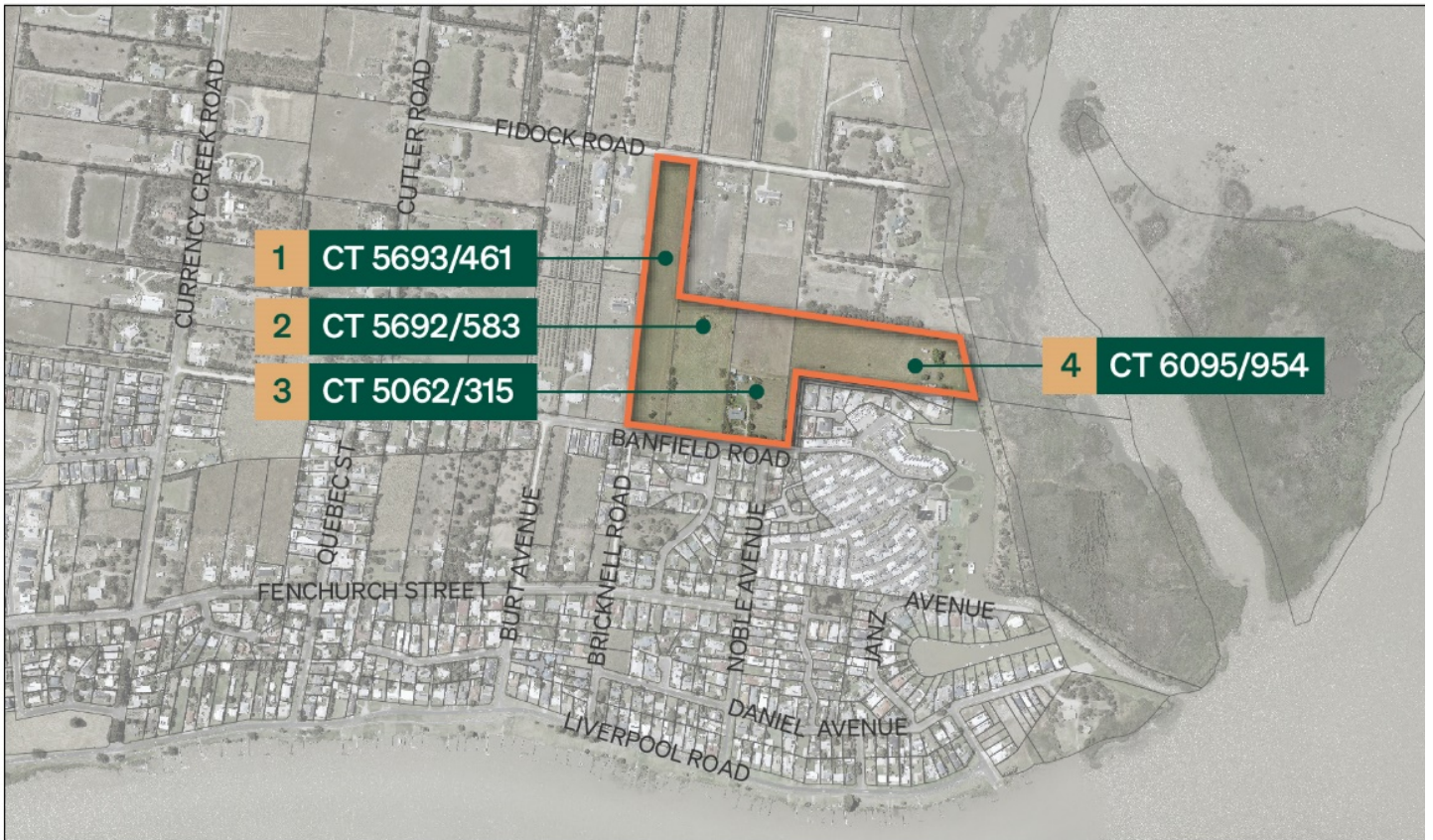
- 64 Fidock Road, Goolwa North (Lot 103 in DP 13542, CT 5693/461)
- 66 Fidock Road, Goolwa North (Lot 30 in DP 130209, CT 6277/190)
- 78 Fidock Road, Goolwa North (Lot 31 in DP 130209, CT 6277/191)

On review of the amended Affected Area, we are of the opinion that the removal of 64, 66 and 78 Fidock Road, Goolwa North will not have a fundamental or material impact on the strategic justification and merits of the proposed Code Amendment.

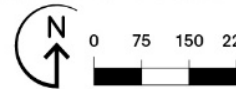
We therefore proposed to remove the land parcels listed above from the 'Affected Area', so that it will include only those listed below and illustrated in Figure 1. Notably, this will not impact on the identified future investigations and considerations outlined in our initial letter to Council.

- 16 Banfield Road, Goolwa North (Lot 103 in DP 13542, CT 5693/461)
- 12 Banfield Road, Goolwa North (Lot 106 in DP 13542, CT 5692/583)
- 6-8 Banfield Road, Goolwa North (Lot 107 in DP 13542, CT 5062/315)
- 4 Banfield Road, Goolwa North (Lot 54 in DP 89165, CT 6095/954)

Figure 1 – Proposed Affected Area



 AFFECTED AREA     CADASTRE



Accordingly, it is the intention of Goolwa Tourist Resort Pty Ltd to lodge a request for a 'Proponent Initiated Code Amendment' with the Minister for Planning over the modified 'Affected Area' recognised as 4-16 Banfield Road, Goolwa North. This document will include a record of discussions and correspondence with Alexandrina Council, including the change to the proposed 'Affected Area'. It will also include a copy of this correspondence confirming Goolwa Tourist Resort Pty Ltd's intention to modify the 'Affected Area' of the proposed Code Amendment to only include land over which they have an 'Interest'.

Please do not hesitate to contact the undersigned if you require further information or clarification.

Kind regards,

**Ryan Moyle**  
Associate



Level 3, 431 King William Street, Adelaide SA 5000

T 08 7231 0286  
M 0431 312 737  
[www.ekistics.com.au](http://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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