



Lakeside Goolwa Code Amendment

Designated Entity:

Goolwa Tourist Resort Pty Ltd

May 2024

FOR CONSULTATION

REF:01322-004



ACKNOWLEDGEMENT TO COUNTRY

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



PROPRIETARY INFORMATION STATEMENT

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Revision	Description	Author	Date
Version 1	Draft Code Amendment – For Client Review	RM & CO	24 April 2024
Version 2	Update following client review	RM & CO	13 May 2024
Final Draft	For Consultation	RM & CO	28 May 2024

CONTENTS

1. HAVE YOUR SAY	6
2. WHAT IS THE PLANNING AND DESIGN CODE	7
3. WHAT IS PROPOSED IN THIS CODE AMENDMENT	9
4. WHAT ARE THE NEXT STEPS IN THE CODE AMENDMENT	20
5. ANALYSIS	24
6. REFERENCES	48

ATTACHMENTS

A - MAP OF AFFECTED AREA

B - CURRENT AND PROPOSED POLICY

C - CURRENT AND PROPOSED MAPPING

D - STRATEGIC PLANNING OUTCOMES

E - INVESTIGATION – ABORIGINAL HERITAGE SITES AND OBJECTS

F - INVESTIGATION – FLORA & FAUNA

G - INVESTIGATION – BUSHFIRE



H - INVESTIGATION – TRAFFIC & ACCESS

I - INVESTIGATION – SERVICES INFRASTRUCTURE & STORMWATER
MANAGEMENT

J - INVESTIGATION - SITE CONTAMINATION

K - CERTIFICATES OF TITLE



1. HAVE YOUR SAY

This Code Amendment is on consultation from 19th June to 31st July 2024 (5:00pm).

During this time you are welcome to lodge a written submission about any of the changes proposed in this Code Amendment.

Submissions on this Code Amendment can be made online, via email, or by post:

Online: via the Plan SA website https://plan.sa.gov.au/have_your_say/code_amendments

Email: engagement@ekistics.com.au – Attention to Lakeside Goolwa Code Amendment

Post: Level 3, 431 King William Street, Adelaide SA 5000 – Attention to Lakeside Goolwa Code Amendment

During the engagement period, clarification or further information can be sourced from the engagement team at Ekistics Planning and Design Pty. Ltd. on (08) 7231 0286 between 9:00am and 5:00pm Monday to Friday.

Two (2) informal drop-in sessions will be held at the Lakeside Goolwa Residential Park during the consultation period.

For further details regarding these sessions or to register your interest in attending, please contact us via email at engagement@ekistics.com.au or check the Plan SA website listed above.



2. WHAT IS THE PLANNING AND DESIGN CODE

The Planning and Design Code (the Code) sets out the rules that determine what landowners can do on their land.

For instance, if you want to build a house, the Code rules will tell you how high you can build and how far back from the front of your land your house will need to be positioned. The Code will also tell you if any additional rules apply to the area where your land is located. For example, you might be in a high bushfire risk area or an area with specific rules about protecting native vegetation.

2.1. Planning and Design Code

The Code is based on a framework that contains various elements called overlays, zones, sub zones and general development policies. Together these elements provide all the rules that apply to a particular parcel of land. An outline of the Code Framework is available on the PlanSA portal.

2.2. Overlays

Overlays contain policies and maps that show the location and extent of special land features or sensitivities, such as heritage places or areas at risk of flooding.

They may apply across one or more zones. Overlays are intended to be applied in conjunction with the relevant zone. However, where policy in a zone conflicts with the policy in an overlay, the overlay policy trumps the zone policy.

2.3. Zones

Zones are areas that share common land uses and in which specific types of development are permitted. Zones are the main element of the Code and will be applied consistently across the state.

For example, a township zone for Andamooka can be expected to apply to similar townships like Carrieton. Each zone includes information (called classification tables) that describes the types of development that are permitted in that zone and how they will be assessed.

2.4. Sub Zones

Sub zones enable variation to policy within a zone, which may reflect local characteristics. An example is Port Adelaide centre, which has many different characteristics to typical shopping centres due to its maritime activities and uses.

2.5. General Development Policies

General development policies outline functional requirements for development, such as the need for car parking or wastewater management. While zones determine what development can occur in an area, general development policies provide guidance on how development should occur.

2.6. Amending the Planning and Design Code

The *Planning, Development and Infrastructure Act 2016* (the Act) provides the legislative framework for undertaking amendments to the Code. With approval of the Minister for Planning and Local Government (the Minister) a Council, Joint Planning Board, Government Agency or private proponent may initiate an amendment to the Code and undertake a Code Amendment process.

An approved Proposal to Initiate will define the scope of the Amendment and prescribe the investigations which must occur to enable an assessment of whether the Code Amendment should take place and in what form.

The State Planning Commission (the Commission) is responsible under the Act for ensuring the Code is maintained, reflects contemporary values relevant to planning, and readily responds to emerging trends and issues.

The Commission provided independent advice to the Minister for Planning and Local Government on the Proposal to Initiate this Code Amendment. The Commission will also provide a report on the Code Amendment (including compliance with the Community Engagement Charter) at the final stage of the Code Amendment process.



Figure 2-1 The Code Amendment Process

3. WHAT IS PROPOSED IN THIS CODE AMENDMENT

3.1. Need for the Amendment

The Code Amendment is proposed at 4-16 Banfield Road, Goolwa North, which currently comprises a number of large, semi-rural lifestyle allotments, adjoining the existing Lakeside Goolwa Residential Park. The land has been identified as the 'Affected Area' for the Code Amendment and is highlighted below in **Figure 3-1**.

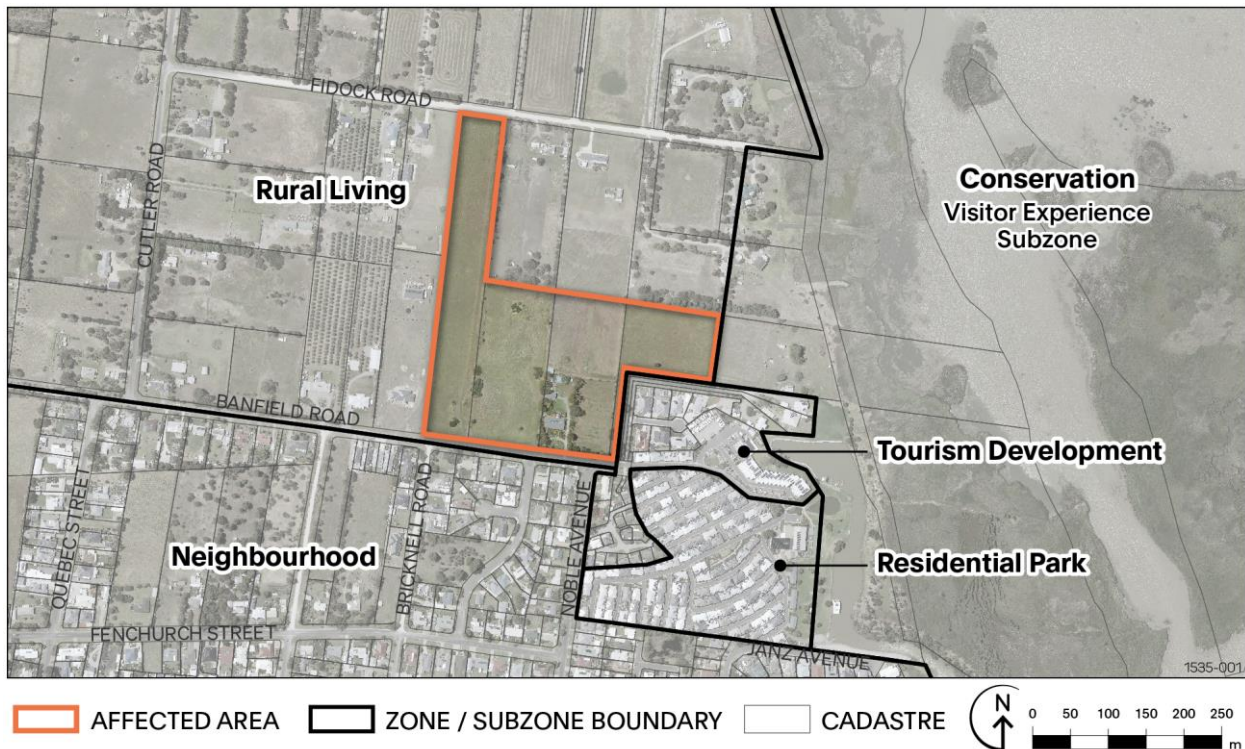


Figure 3-1 The Affected Area

This Code Amendment does not propose to amend the zoning for the following portion of the Affected Area:

- The northern portion of Certificate of Title Volume 5693 Folio 461 that will remain within the Rural Living Zone.

Notably, the portion of the land within 4 Banfield Road: Certificate of Title Volume 6095/954 – Allotment 54 in Deposited Plan 89165, situated within the Conservation Zone, is not included within the Affected Area and not part of the rezoning.

Under the Code, the Affected Area is currently wholly located within a Rural Living Zone which is best described as a semi-rural environment with low intensity rural activities or home-based business activities supporting a semi-rural lifestyle. Within the Rural Living Zone, the Code currently seeks new allotments for semi-rural living with a minimum site area of 1 hectare.

The Designated Entity own and operate Lakeside Goolwa, a fully developed and successful Residential Park comprising 158 sites and a range of communal and recreational facilities that have set the standard for quality Over 50's Lifestyle Living in South Australia.



The Fleurieu Peninsula continues to be a popular destination for over 50's to downsize and enjoy all the benefits of the incredible lifestyle on offer, from the beautiful beaches, coastal towns, national parks and convenient access to Adelaide, not to mention the benefits that village life offers.

The existing Lakeside Goolwa facility has been fully developed and now at capacity. Despite this, there is still a substantial unmet demand generated by new residents looking to reside within this existing community, combined with existing residents of Goolwa seeking to downsize without having to leave the township and region.

The Designated Entity is therefore proposing this Code Amendment to enable a logical expansion of the existing Lakeside Goolwa facility onto the Affected Area, providing an opportunity to meet the growing demand for affordable retirement living and lifestyle accommodation for over 50's.

It is quite clear that at both the state and national level, there is an urgent need to provide a range of new housing supply in order to enhance affordability and choice for various types of home owners and occupiers. The expansion of the existing Lakeside Goolwa facility creating additional retirement and lifestyle accommodation, will enable residents within the region to downsize, unlocking existing housing for younger home buyers and renters within the region.

The current Rural Living Zone is there not aligned with the intended redevelopment of the Affected Area for the purpose of expanding the existing Residential Park.

3.2. Affected Area

The Affected Area of this Code Amendment is illustrated in the maps provided in **Attachment A** and **Figure 3.2** below. The land comprises 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, on the traditional lands of the Ngarrindjeri People. The Affected Area equates to 7.7 hectares in area.

The Affected Area comprises the following allotments (identified in **Figure 3.2**):

1. 16 Banfield Road: Certificate of Title Volume 5693 Folio 461 – Allotment 103 in Deposited Plan 13542
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 107 in Deposited Plan 13542
4. 4 Banfield Road: Certificate of Title Volume 6095/954 – Allotment 54 in Deposited Plan 89165 (*note: the Minister's Initiation Approval letter, dated 05/12/2023 excludes consideration of rezoning the eastern portion of the allotment located within the Conservation Zone and therefore is not included within the Affected Area*)

Copies of the Certificates of Title are contained within **Attachment K**.

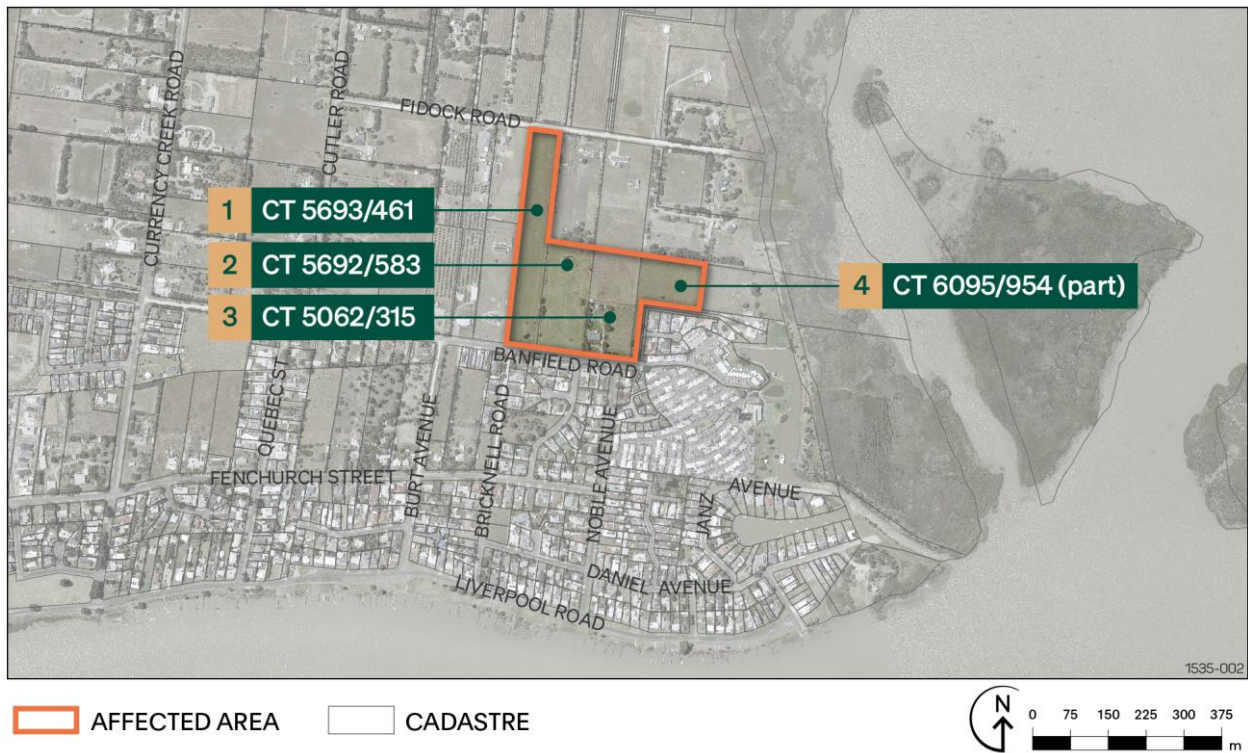


Figure 3-2 Map of Affected Area allotments

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, with vehicle access provided via both street frontages to the various allotments. Both these roads are local roads, under the care and control of the Alexandrina Council. The Affected Area comprises a number of large, semi-rural lifestyle allotments and currently contains one (1) detached dwelling, various outbuildings, water tanks and some vegetation.

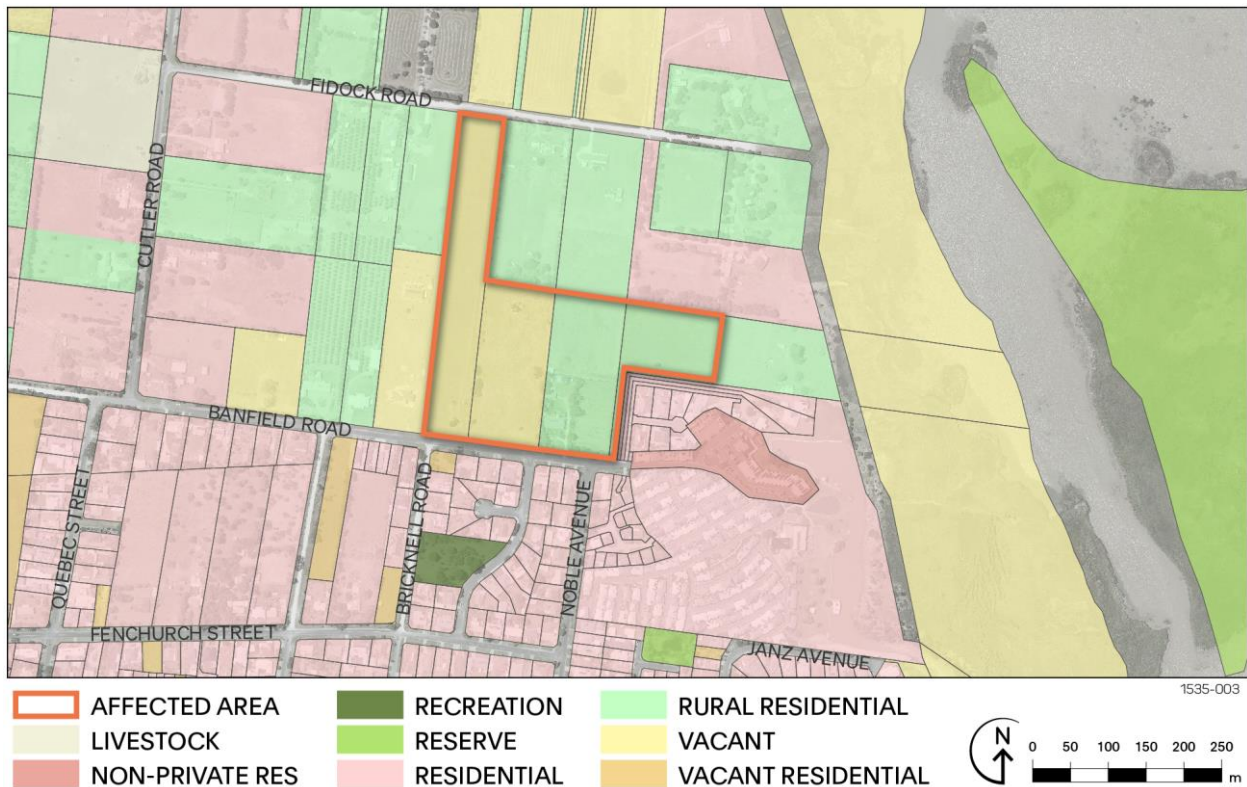


Figure 3-3: Existing Land Uses Within the Locality (SAPPA)

The Affected Area is at the northern interface between the established residential area that extends part way towards 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 and south-east of the Affected Area, and adjoins the Affected Area on the eastern side. It comprises 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 (e.g. bowling green, table tennis, darts, golf putting green), 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.

A community titled, low rise residential development known as Myrtle Close adjoins the south-eastern corner of the Affected Area. Land to the north and west of the Affected Area comprises semi-rural living allotments with associated dwellings and low scale rural activities. Existing residential development in the locality to the south of the Affected Area across Banfield Road, comprises primarily single or double storey detached dwellings at relatively low densities. To the further east of the Affected Area lies the waterfront and Currency Creek inlet of the Murray River.

Images of the Affected Area and its immediate surrounds are provided in **Figure 3.4** below.



Figure 3-4: Images of the Affected Area and Surrounds

3.3. Summary of Proposed Policy Changes

3.3.1. Current Code Policy

A map which illustrates the current zoning for the Affected Areas is provided in **Attachment B**, and is also illustrated in **Figure 3.5** below:

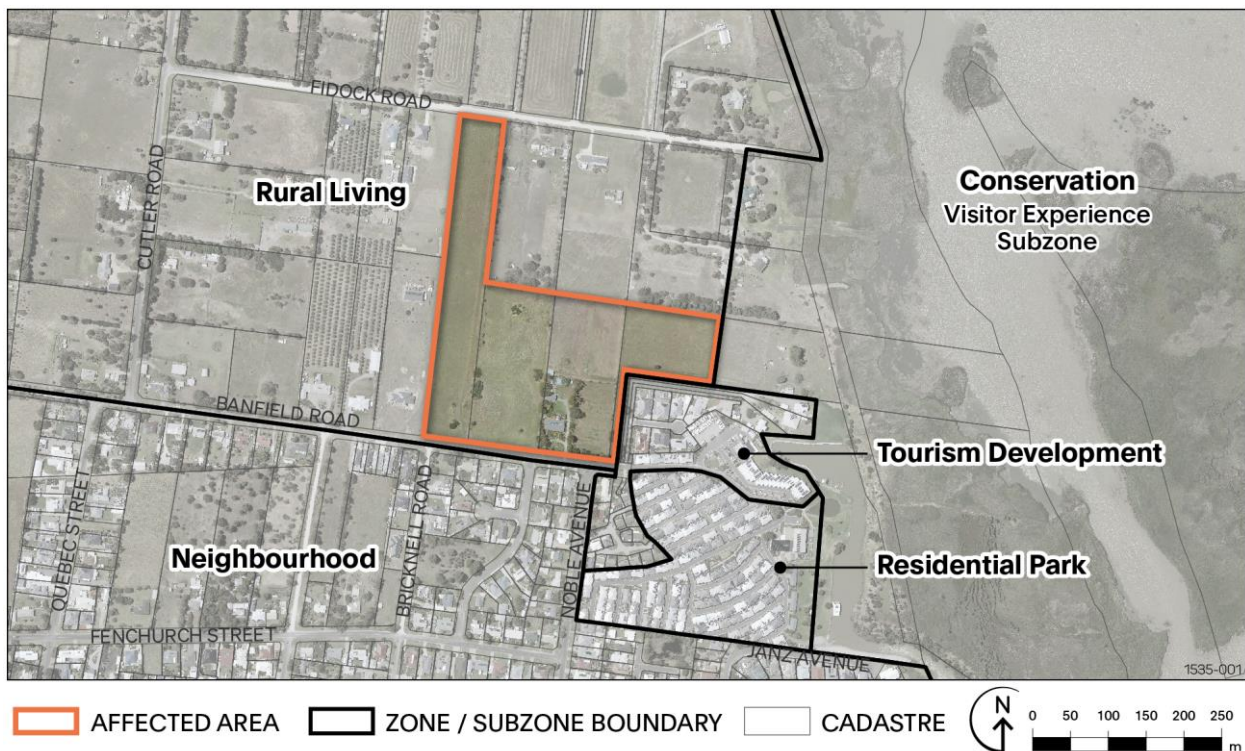


Figure 3-5 Existing Zoning

The Affected Area is currently located within the **Rural Living Zone** of the Code.

The Affected Area is subject to the following Overlays, and the description of each overlay is provided in **Attachment C**:

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

The Affected Area is also subject to the following Technical and Numeric Variation ('TNV'):

- Minimum site area is 1 hectare

The Desired Outcome (DO) for the 'Rural Living Zone' is 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' (DO 1). Performance Outcome (PO) 1.1 suggests that development within the Rural Living Zone should be 'Residential development with complementary ancillary non-residential uses that do not place additional demands on services and infrastructure, and compatible with a secluded semi-rural or semi-natural residential character', with examples of contemplated forms of development provided in Designated Performance Feature (DPF) 1.1:

DTS/DPF 1.1: *Development comprises one or more of the following:*

- | | | |
|----------------------------------|-----------------------------|--------------------------|
| a) <i>Agricultural Buildings</i> | f) <i>Dwelling addition</i> | k) <i>Office</i> |
| b) <i>Animal Keeping</i> | g) <i>Farming</i> | l) <i>Outbuilding</i> |
| c) <i>Carport</i> | h) <i>Horse keeping</i> | m) <i>Shelter/Stable</i> |
| d) <i>Consulting room</i> | i) <i>Kennel</i> | n) <i>Shop</i> |
| e) <i>Detached dwelling</i> | j) <i>Light industry</i> | o) <i>Verandah</i> |

3.3.2. Proposed Code Policy

Summary of the Code policy changes

The Code Amendment proposes the following changes (as shown in **Attachment B**):

- Rezone 6.5 ha of the Affected Area from the '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 southeast; and
- Removal of existing 'Minimum Site Area': TNV, as it is associated with the 'Rural Living Zone'.

A 1.2 ha northern portion of the Affected Area within the 'Rural Living Zone' of the Affected Area will remain unchanged.

The proposed zoning is illustrated in **Figure 3.6** with further discussion on the policy changes provided below.

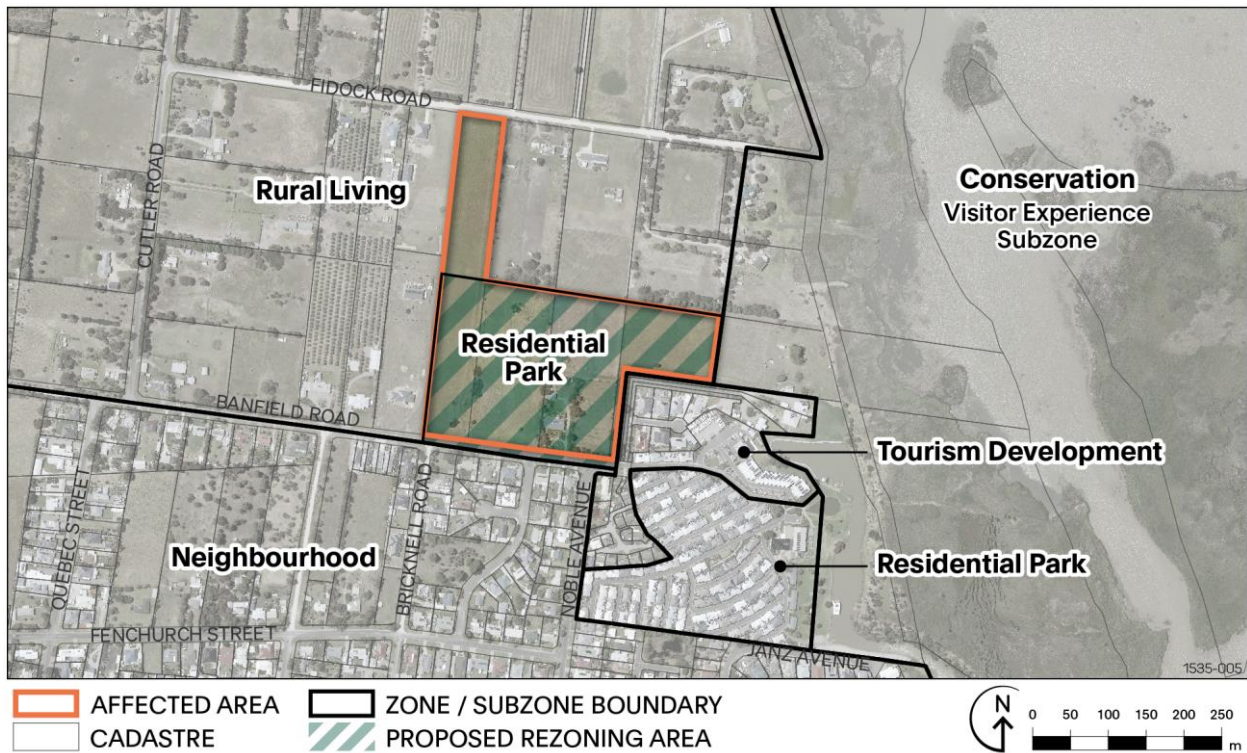


Figure 3-6 Proposed Rezoning

Why the Residential Park Zone?

As illustrated in **Figure 3.6**, the 'Residential Park Zone' will apply to portion of to the Affected Area, adjacent the Tourism Development Zone and Residential Park Zone to the southeast, comprising the existing Lakeside Goolwa Residential Park. The 'Tourism Development Zone' envisages tourist accommodation and a range of complementary entertainment, recreation and service activities catering to the needs and enjoyment of travellers. The 'Residential Park Zone' envisages accommodation in the form of caravan and camping sites, cabins, and transportable dwellings, with associated small-scale services and facilities.

The 'Residential Park Zone' was selected to facilitate future expansion of the Lakeside Goolwa facility, which is at capacity, and is experiencing substantial demand generated by new residents looking to reside within the community, combined with existing residents of Goolwa seeking to downsize. 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 Residential Park.

Refer to **Section 5.6** regarding further discussion of the investigations undertaken that have assessed the suitability of the land for the proposed zoning.

Desired Land Uses

The 'Residential Park Zone' contemplates the following desired outcome:

- DO 1:** *Affordable living, short term accommodation and associated small-scale services and facilities are provided in an open landscaped setting.*

Performance Outcome 1.1 suggests that land within the 'Residential Park Zone' will be used to accommodate:

PO 1.1: *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 corresponding Designated Performance Feature (DPF 1.1), provides the following examples of contemplated land uses for the Zone:

DTS/DPF 1.1: *Development comprises one or more of the following:*

- | | |
|---|---------------------------------|
| a) <i>Amenity block</i> | f) <i>Outbuilding</i> |
| b) <i>Caravan permanently fixed to land</i> | g) <i>Residential Park</i> |
| c) <i>Community facility</i> | h) <i>Shop</i> |
| d) <i>Detached dwelling</i> | i) <i>Office</i> |
| e) <i>Indoor recreation facility</i> | j) <i>Tourist accommodation</i> |

Within the 'Residential Park Zone', the proposed 'residential park' development should be low-rise and of an appropriate scale to maintain an open landscaped character and setting. The following Performance Outcomes provide further guidance on the form and type of developments contemplated for this zone:

PO 1.2: *Permanent buildings are consistent with the primary role of the park and maintain an open landscaped character by being limited to:*

- a) *a dwelling (manager's house)*
- b) *shop or office (in association with and ancillary to a residential park)*
- c) *community or recreational facilities*
- d) *toilets/amenities.*

PO 1.3: *Facilities to support the needs and enjoyment of visitors and occupants (such as shower, toilet and laundry facilities, recreation areas including tennis court, basketball court, playground, swimming pool/spa and the like) are provided at a scale suitable to maintain the open natural character of the area and ancillary to the primary role of the park.*

Site Dimensions, Built Form and Character

The following Performance Outcomes provide guidance on the site dimensions, built form, and character of development established within the 'Residential Park Zone':

PO 2.1: *No additional allotment(s) are created wholly or partly within the zone except where a lease or license agreement is made, granted or accepted under the Residential Parks Act 2007.*

PO 2.2: *Each caravan, cabin and dwelling is provided with adequate space for the occupants' exclusive use to enhance the amenity for travellers.*

PO 3.1: *Landscaping is used to define spaces, reinforce internal networks, screen utility areas and enhance the visual amenity of the area.*

PO 3.2: *Buildings and structures incorporate a small setback from internal roads to ensure safe internal movement.*

PO 3.3: *Buildings and structures are sufficiently set back from any public road to minimise impacts on the streetscape.*

PO 3.4: *Buildings and structures are set back from the park boundary to minimise impacts on neighbouring properties.*

The density of future developments will be managed by the site area and setbacks prescribed by the Zone, and also by the minimum requirements prescribed to by the 'Design – General Development Policies'.

Site Area and Setbacks

The 'Residential Park Zone' prescribes setbacks and site area:

DTS/DPF 2.2: *Caravan, cabin and dwelling sites are not less than 100m² in area.*

DTS/DPF 3.2: *Buildings and structures are set back at least 1m from any internal road.*

DTS/DPF 3.3: *Buildings and structure are set back at least 6m from a public road.*

DTS/DPF 3.4: *Building and structures are set back at least 2m from the park boundary.*

Overlays to be applied to the Affected Areas

Table 3-1 provides a summary of the Overlays to be applied to the Affected Area. An explanation of each overlay, together with a summary of the proposed overlay changes is also provided **Attachments B & C**.

Table 3-1 Proposed Overlays for Affected Area

Proposed Overlays	Summary of Changes
Airport Building Heights (Aircraft Landing Area)	Retain existing overlay
Building Near Airfields	Retain existing overlay
Hazards (Bushfire – Medium Risk)	Retain existing overlay
Hazards (Bushfire – Urban Interface)	Retain existing overlay
Hazards (Flooding – Evidence Required)	Retain existing overlay
Murray-Darling Basin	Retain existing overlay
Native Vegetation	Retain existing overlay

Proposed Overlays	Summary of Changes
River Murray Flood Plain Protection Area	Retain existing overlay

The Code Amendment does not proposed any changes to the application of existing overlays, and does not introduce any overlays to be applied to the Affected Area.

Technical and Numerical Variations

Section 66(4) of the *Planning Development and Infrastructure Act 2016* (the 'Act') provides that the Code may include provisions that provide for the adaptation of the rules that apply to account for local variations in appropriate circumstances (referred to within the Code as 'Technical and Numerical Variations (TNV's)').

The Code Amendment proposes to remove the existing minimum site area TNV that applies to the Affected Area, as it is not aligned with the desired outcomes of the Residential Park Zone.

4. WHAT ARE THE NEXT STEPS IN THE CODE AMENDMENT

4.1. Engagement

Engagement on the Code Amendment must occur in accordance with the Community Engagement Charter principles, which require that:

- a) *engagement is genuine*
- b) *engagement is inclusive and respectful*
- c) *engagement is fit for purpose*
- d) *engagement is informed and transparent*
- e) *engagement processes are reviewed and improved.*

An Engagement Plan has been prepared for this Code Amendment to ensure that engagement will be conducted and measured against the principles of the Charter. Further information on the Community Engagement Charter can be accessed via Plan SA at www.plan.sa.gov.au/en/charter.

Engagement will be undertaken over a 6-week period, commencing on 23 May 2024 and concluding on 4 July 2024. A summary of the engagement activities proposed for this Code Amendment is provided below:

- The following stakeholders will receive direct correspondence (letter or email) inviting them to provide feedback on the draft Code Amendment:
 - Adjacent landowner/occupiers, including existing Lakeside Goolwa residents;
 - Non-adjacent landowners/occupiers who may be specifically impacted by the proposed rezoning;
 - Aboriginal Groups/organisations/Traditional Owners, including:
 - » Ngarrindjeri Aboriginal Corporation (RNTBC)
 - » Ngarrindjeri Regional Authority Incorporated
 - » Ramindjeri Cultural Heritage Association Incorporated (RCHAI)
 - » Ramindjeri Heritage Association Incorporated
 - Alexandrina Council;
 - Key government agencies including:
 - » Department for Trade and Investment – Planning and Land Use Services (DTI-PLUS);
 - » Department for Infrastructure and Transport (DIT);
 - » South Australian Country Fire Service (CFS);

- » Department for Environment and Water, including Green Adelaide (DEW);
- » Native Vegetation Council;
- » Environment Protection Authority (EPA);
- » Affordable Housing Unit of the SA Housing Authority; and
- » Office for Ageing Well, SA Health;
- Utility providers including SA Power Networks, ElectraNet, APA Group, SA Water, Epic Energy, NBN, Telstra, and other telecommunications providers;
- State Member of Parliament for Finniss, David Basham MP;
- Federal Member of Parliament for Mayo, Rebecca Sharkey MP;
- Local Government Association;
- Southern and Hills Regional Local Government Association; and
- Regional Development Australia – Adelaide Hills, Fleurieu and Kangaroo Island.
- The wider community will be invited to provide feedback on the proposed Code Amendment. Consultation and engagement with the community will occur in the following ways:
 - Signage installed on-site by the first day of the consultation period;
 - Publication of the proposed Code Amendment will be placed on the SA Planning Portal;
 - Preparing and sending letters to key stakeholders and letter box dropping to residents and businesses in the primary and secondary catchment areas;
- Specific engagement activities that will occur throughout the consultation period will include:
 - Two (2) community drop-in sessions during the consultation period;
 - Preparation of consultation material including fact sheets, FAQs, and background information;
 - Inviting the opportunity to undertake a briefing to Alexandrina Council Elected Members and staff; and
 - Preparing an online survey to gather feedback on the Amendment.

The community drop-in sessions will be held at the existing Lakeside Goolwa site. Details of the dates and times of these sessions will be published on the Plan SA website. Registrations of interest in attending sessions can be emailed to engagement@ekistics.com.au.

4.2. How can I have my say on the Code Amendment?

There are several ways in which you can provide feedback on the Code Amendment. This includes:

Online: via the Plan SA website https://plan.sa.gov.au/have_your_say/code_amendments



Email: engagement@ekistics.com.au – Attention to **Lakeside Goolwa Code Amendment**

Post: Ekistics Planning and Design Pty Ltd, Level 3, 431 King William Street, Adelaide SA 5000 – Attention to Lakeside Goolwa Code Amendment

4.3. What changes to the Code Amendment can my feedback influence?

Aspects of the project which stakeholders and the community **can** influence are:

- Appropriateness of applying the **Residential Park Zone** over the Affected Area;
- Application of Overlays to the Affected Area; and
- Whether the investigations associated with the Code Amendment have appropriately addressed the following key issues:
 - Traffic and access impacts including distribution and volume of traffic within the surrounding road network;
 - Stormwater and flooding impacts;
 - Flora and fauna impacts;
 - Infrastructure and servicing capacity and augmentation capability;
 - Residential growth and land supply analysis;
 - Environmental considerations; and
 - Any other matters that may require further consideration/investigation before finalisation of the Code Amendment process.

Aspects of the project which stakeholders and the community **cannot** influence are:

- The geographic extent of the Code Amendment proposal;
- The policies and wording contained in the General Modules of the Planning and Design Code; and
- The policies and wording contained in the Zones, Subzones and Overlays of the Planning and Design Code.

4.4. What will happen with my feedback?

As the Designated Entity for the proposed Code Amendment, Goolwa Tourist Resort Pty Ltd is committed to undertaking consultation in accordance with the principles of the Community Engagement Charter and is genuinely open to considering the issues raised by people in the community.

All formal submissions will be considered by Goolwa Tourist Report Pty Ltd when determining whether the proposed Amendment is suitable and whether any changes should be made.



Each submission will be entered into a register and you will receive an email acknowledging receipt of your submission. Your submission will be published on the PlanSA portal. Personal addresses, email and phone numbers will not be published, however company details will be.

Goolwa Tourist Resort Pty Ltd will consider the feedback received in finalising the Code Amendment and will prepare an Engagement Report which will outline what was heard during consultation and how the proposed Code Amendment was changed in response to submissions.

The Engagement Report will be forwarded to the Minister, and then published on the PlanSA portal.

4.5. Decision on the Code Amendment

Once the Engagement Report is provided to the Minister, the Commission may provide further advice to the Minister, at the Minister's request, if the Code Amendment is considered significant.

The Minister will then either adopt the Code Amendment (with or without changes) or determine that the Code Amendment should not proceed. The Minister's decision will then be published on the PlanSA portal.

If adopted, the Code Amendment will be referred to the Environment Resources and Development Committee of Parliament (ERDC) for their review. The Commission will also provide the Committee with a report on the Code Amendment, including the engagement undertaken on the Code Amendment and its compliance with the Community Engagement Charter.

5. ANALYSIS

This section summarises the investigations that have been undertaken to support the Code Amendment and includes an analysis of the proposed rezoning against strategic planning instruments and policies.

5.1. Strategic Planning Outcomes

The key strategic planning outcomes for this Code Amendment are summarised below and have been informed by the technical investigations discussed in **Section 5.6**.

The proposed rezoning of portion of the Affected Area to the Residential Park Zone represents a logical opportunity for a co-ordinated and well-designed master planned development delivering additional affordable residential accommodation in the Goolwa area.

Strategic advantages and outcomes in relation to the proposed rezoning include:

5.1.1. Strategic Outcome 1: Seeks to address an existing demand for affordable retirement and lifestyle housing

The Code Amendment presents an opportunity to rezone the Affected Area to support the efficient delivery of additional housing stock for persons aged over 50, in a location which has an older population profile, an identified demand for additional housing stock and is in a location that will benefit from the connection with the adjoining existing Goolwa Lakeside facility.

The Code Amendment presents an opportunity to deliver 170-200 new living units that will support housing choice and affordability.

5.1.2. Strategic Outcome 2: Preservation of conservation areas

The Code Amendment is responsive to its location adjacent to the RAMSAR listed wetland of international significance by not proposing any policy change to the area to the east of the Affected Area within the existing Conservation Zone and therefore excluding this portion of the land from the rezoning. The potential exists to utilise the Conservation Zone for passive recreational activities such as bird watching and boardwalks that could become a significant environmental asset to the Residential Park.

Based on the investigations undertaken, existing Code policies relating to flooding and bushfire will provide a robust assessment framework.

Future development of the Affected Area will provide opportunities to revegetate or facilitate natural regeneration across the site that has been largely cleared of vegetation, particularly the fringing wetland at the eastern boundary of the site.

5.1.3. Strategic Outcome 3: Implement a Policy Framework that Manages Interface and Off-Site Impacts to the Locality

The Code Amendment does not propose to rezone the sections of land to the west of the Affected Area located within the Conservation Zone, or narrow section of the land fronting Fidock Road where it would be more difficult to mitigate potential impacts on adjoining land.

5.1.4. Strategic Outcome 4: Efficient Use of Existing Infrastructure and Utilities

Investigations have confirmed that the Affected Area is well served by existing utilities including water, sewer, electricity and communications infrastructure.

Future development of the Affected Area does not require significant extensions to civil infrastructure and can be appropriately serviced via existing infrastructure located within close proximity.

5.1.5. Strategic Outcome 5: Facilitates an expanded Residential Park in an accessible location

There is ample spare capacity within the existing road network to accommodate the predicted traffic volumes, without requiring significant road or intersection upgrades.

5.2. Consistency with the State Planning Policies

State Planning Policies define South Australia's planning priorities, goals and interests. They are the overarching umbrella policies that define the state's interests in land use. There are 16 State Planning Policies and six special legislative State Planning Policies.

These policies are given effect through the Code, with referral powers assigned to relevant Government Agencies (for example, the Environmental Protection Agency for contaminated land). The Code (including any Code Amendments) must comply with any principle prescribed by a State Planning Policy.

This Code Amendment is considered to be consistent with the State Planning Policies as shown in **Attachment D**.

5.3. Consistency with the Regional Plan

5.3.1. 30 Year Plan for Greater Adelaide

The directions set out in Regional Plans provide the long-term vision and set the spatial patterns for future development within a region. This can include land use integration, transport infrastructure and the public realm.

The Commission has identified that the existing volumes of the South Australian Planning Strategy, prepared under the *Development Act 1993*, will apply until such time as the new Regional Plans are prepared and adopted. Refer to the PlanSA portal for more information on the Commission's program for implementing Regional Plans throughout South Australia.

Where there is conflict between a Regional Plan and the State Planning Policies, the State Planning Policies will prevail.

The *30-Year Plan for Greater Adelaide* ('30YPGA') is relevant for this Code Amendment.

This Code Amendment is considered to be consistent with the 30YPGA as shown in **Attachment D**.

5.3.2. Greater Adelaide Regional Plan - Discussion Paper

The Greater Adelaide Regional Plan (GARP) will replace the 30YPGA, and will include how and where Greater Adelaide will accommodate future population growth, in a 30 year timeframe. The State Planning Commission released a Discussion Paper for the GARP for consultation, which has now concluded and the feedback received is being reviewed. The Code Amendment is consistent with the GARP Discussion Paper, as it provides additional land for housing in a location identified for future housing growth.

This Code Amendment is considered support the future policy directions outlined in the GARP Discussion Paper as shown in **Attachment D**.

5.4. Consistency with other key policy documents

This Code Amendment also aligns with the following key policy documents, as discussed below.

5.4.1. Alexandrina Council – Strategic Management Plan (A2040)

The proposal is aimed at enabling the expansion of the existing adjacent Residential Park, which will support the creation of an urban village supporting active lifestyles, while maintaining existing high value environmental attributes, in a location that is connected to existing infrastructure and services within the Goolwa township.

The Code Amendment is considered to support the delivery of the Strategic Plan key indicators as shown in **Attachment D**.

5.4.2. Alexandrina Council – Goolwa (and Surrounds) Growth Concept Plan (TBC)

Alexandrina Council is planning for growth in and around Goolwa and is preparing a 'Goolwa Growth Concept Plan', with a number of options put forward for consultation in late 2023. At the time of preparation of this Code Amendment, Council had not resolved to endorse any of the proposed Concept Plans.

5.4.3. Alexandrina Council – Economic Development Strategy 2022-2027

The Code Amendment will support and facilitate the expansion of an existing business (a Residential Park), encouraging investment in the region and enabling population growth (aimed at the largest cohort in the local area) that will in turn support local businesses within the Goolwa township.

The Code Amendment is considered to support the four key action areas of the Strategy as shown in **Attachment D**.

5.4.4. Southern and Hills Local Government Association Regional Health and Wellbeing Plan 2022-2027

The Code Amendment aligns with the Plan's vision for "healthy, liveable, connected and resilient communities" as the Code Amendment will enable 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 resident health and wellbeing and fosters community.

The Code Amendment is considered to support the Regional Health and Wellbeing Plan as shown in **Attachment D**.

5.5. Infrastructure Planning

Infrastructure and servicing requirements for the Affected Area have been reviewed as part of the Civil Infrastructure Investigations Report prepared by Greenhill Engineers ('BSE') as contained within **Attachment I**.

Table 5-1 below addresses the infrastructure planning requirements for this Code Amendment.

Table 5-1 Infrastructure Planning Analysis

Infrastructure	Relevant Authority	Response / Comment
Stormwater	Alexandrina Council	<p>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.</p> <p>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.</p> <p>The inclusion of rainwater tanks incorporated into a development of the subject site will enable capture and reuse of stormwater on-site, and contribute to meeting the WSUD outcomes, as well as reducing potable water demand.</p> <p>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.</p> <p>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</p>
Road Infrastructure	Alexandrina Council	<p>Empirical Traffic Advisory (see Appendix H) have undertaken an assessment of the potential impact of future development of the Affected Area envisaged by the Code Amendment on the local road network. As detailed in Section 5.6.4, it is anticipated that</p>



Infrastructure	Relevant Authority	Response / Comment
		<p>future development will generate up to 420 vehicles per day and 80 trips per hour during the peak hour which will be distributed mainly between Banfield Road and Noble Avenue.</p> <p>ETA have advised that this volume of traffic will have a very minor impact on the traffic volumes on the local road network, with no changes or upgrades to the local roads, including to existing intersections which can remain in their existing form (unsignalised), with no upgrades required as a result of the proposed rezoning.</p>
Sewer	Alexandrina Council	<p>There is an existing wastewater management scheme under the care and control of Alexandrina Council that services properties in the area including the existing Banfield Road area and the Lakeside Goolwa Residential Park.</p> <p>From enquiry with Alexandrina Council, it is understood that the existing vacuum sewer system is expected to have adequate capacity to service a development of the site, albeit this will be confirmed via detailed hydraulic report in any future development application(s). There is the potential that upgrade or augmentation works may be required to the existing wastewater system, and as mentioned, this will be assessed and detailed during the future development application phase.</p>
Potable Water	SA Water	<p>There is an existing SA Water 100mm diameter potable water main network in Banfield Road and adjoining roads. The existing network is connected to larger SA Water potable water mains (200m diameter and 150mm diameter) in Fenchurch Street.</p> <p>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. This can occur as part of the future development application process.</p>



Infrastructure	Relevant Authority	Response / Comment
Electrical Supply	SA Power Networks (SAPN)	<p>There is an existing 11KV high voltage (HV) overhead and underground power line in Banfield Road and Fidock Road.</p> <p>Based on preliminary investigations undertaken it would appear the existing HV network will allow connection with an extension of the existing high voltage network required to serve the subject site, most likely including a HV tie between Banfield Road and Fidock Road power lines.</p>
Telecommunications	Telstra and NBN	<p>There is existing telecommunications infrastructure along Fidock Road and Banfield Road. This should enable telecommunications connections to the Affected Area, subject to assessment and meeting with the requirements of the service provider.</p>
Gas Supply	APA Group	<p>There is no existing gas infrastructure serving Goolwa North.</p>

5.6. Investigations

The extent of investigations that have been undertaken as part of the Code Amendment process have been agreed by the Minister in the Proposal to Initiate.

Pursuant to section 73(5) of the Act, the Minister approved initiation of the Code Amendment subject to the following conditions:

- Prior to approval 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 consultation.
- The scope of the proposed Code Amendment does not include that portion of land within the Conservation Zone.

The following investigations have been undertaken to inform this Code Amendment:

- Population Profile Analysis;
- Land Supply and Growth Analysis;
- Flora and Fauna Analysis;
- Bushfire Management Analysis;
- Traffic and Access Analysis;
- Infrastructure and Servicing Analysis;
- Preliminary Site Investigation (Site Contamination); and
- Cultural Heritage Investigations;

Investigations have also been informed by an assumed yield of between 170-200 dwellings, in a similar form and density to the existing neighbouring Lakeside Goolwa site. This yield accounts for the provision of shared recreational and leisure facilities that are typical of a Residential Park living format.

We note that the investigations undertaken to inform the amendment were undertaken across the whole of the landholdings and for robustness, included the portion of land within the Conservation Zone. In particular in relation to flora and fauna, cultural heritage, site contamination and bushfire investigations.

The outcomes of the investigations are addressed below:

5.6.1. Population Profile

Goolwa (as per the 2021 Census Area – Goolwa Urban Centre and Locality) had a population of 8,756 persons in 2021. The median age of the population was 63 years, which is significantly older than the median age of 41 years across South Australia.

Figure 5.1 illustrates the high proportion of the population in the over 50s age cohorts in the Goolwa census area in comparison to South Australia and Australia.

Age All people	Goolwa	%	South Australia	%	Australia	%
Median age	63	N/A	41	N/A	38	N/A
0-4 years	236	2.7	94,232	5.3	1,463,817	5.8
5-9 years	281	3.2	103,750	5.8	1,586,138	6.2
10-14 years	341	3.9	105,159	5.9	1,588,051	6.2
15-19 years	312	3.6	99,152	5.6	1,457,812	5.7
20-24 years	204	2.3	109,174	6.1	1,579,539	6.2
25-29 years	239	2.7	117,195	6.6	1,771,676	7.0
30-34 years	275	3.1	118,095	6.6	1,853,085	7.3
35-39 years	277	3.2	118,993	6.7	1,838,822	7.2
40-44 years	337	3.8	107,667	6.0	1,648,843	6.5
45-49 years	396	4.5	109,716	6.2	1,635,963	6.4
50-54 years	416	4.8	114,921	6.5	1,610,944	6.3
55-59 years	575	6.6	114,300	6.4	1,541,911	6.1
60-64 years	789	9.0	112,846	6.3	1,468,097	5.8
65-69 years	1,041	11.9	102,304	5.7	1,298,460	5.1
70-74 years	1,168	13.3	94,040	5.3	1,160,768	4.6
75-79 years	863	9.9	66,986	3.8	821,920	3.2
80-84 years	569	6.5	45,666	2.6	554,598	2.2
85 years and over	435	5.0	47,325	2.7	542,342	2.1

More information on [Age \(AGEP\)](#)

Table based on place of usual residence

Figure 5-1 - Goolwa Population - Age Profile (Source: Census 2021)

Other key population characteristics of the Goolwa community are:

- All age cohorts up to 50 years being a lower proportion than the South Australian average;
- A higher proportion of married/separated/divorced/widowed (79.2%) than the South Australian average (64.6%);
- Low workforce participation (35.4% in Goolwa compared to 60% in South Australia) which is consistent with the older age profile;
- A significantly higher proportion of households comprising a couple without children (66.4% in Goolwa compared to 41% in South Australia);
- Dwelling types (number of bedrooms) being similar to that across South Australia, but with a higher proportion of dwellings being separate houses (88.9% in Goolwa compared with 78% in South Australia); and
- English, Australian, Scottish, Irish and German are identified as the most common ancestries, with English & Australian comprising 87.5% of the Goolwa population (compared to 70.5% across South Australia)

Policy Response to Population Profile Analysis

The proposed rezoning to Residential Park Zone is aimed at facilitating new housing for person aged over 50 years, responding to the older population profile and demand for retirement and lifestyle housing.

5.6.2. Land Supply and Growth

Prepared by the South Australian Government (PlanSA), the Land Supply Report for Greater Adelaide Residential ('LSR 2021') was published on 2 June 2021 and presents the findings of investigations performed on the following:

- Urban development trends;
- Population growth and projections;
- Land supply and demand analysis; and
- Housing construction and activity.

The LSR 2021 is an evidence-based report which is intended to inform strategic decision making, including for Code Amendments for the rezoning and release of land for future residential development. The Study Area for the LSR 2021 is divided into a number of regions, with the Affected Area located within 'Fleurieu Peninsula' region, comprising land within the Alexandrina Council.

For the Fleurieu Peninsula, the LSR 2021 estimates the following dwelling projections for two growth rate scenarios between the period 2020 to 2030:

- Medium growth rate scenario: 8,300 dwellings; and
- High growth rate scenario: 13,600 dwellings.

The above-mentioned growth rate scenarios are informed by population projections of +17,000 people (medium growth scenario) and +28,400 people (high growth scenario) between 2020 to 2030. These projections are consistent with the forecast growth identified in the Greater Adelaide Regional Plan Discussion Paper, see Section 5.3.2 above.

We note, that the LSR has not specifically considered Residential Parks.

On 27 July 2023 an updated Land Supply Report for Greater Adelaide Residential ('LSR 2022') was published by the South Australian Government (PlanSA). In the LSR 2022, the Affected Area is identified as being an 'established urban area' and is considered to be a strategic infill site with an area of approx. 7,264m².

The Affected Area has the capacity to contribute approximately 170-200 new residential homes to supply within the region aimed at an age cohort that comprises the highest proportion of the population in this location.

Policy Response to Land Supply and Growth Investigations

The proposed Residential Park Zone will provide additional land supply for around 170-200 new homes.

5.6.3. Suitability of the Residential Park Zone

The Designated Entity has explored the suitability of applying the 'Residential Park Zone' over the Affected Area, taking into consideration the locality, the existing land use of the Affected Area and intended future outcomes. As summarised below, following investigations the Designated Entity has determined to not seek any change of zoning to the northern portion of the western land parcel within the Affected Area (CT5693/461) based on assessment of its suitability to be developed in the future uses consistent with the Residential Park Zone

The Desired Outcome for the 'Residential Park Zone' is listed below:

DO1 *Affordable living, short term accommodation and associated small-scale services and facilities are provided in an open landscaped setting.*

Performance Outcome 1.1 suggests that land within the 'Residential Park Zone' *will be used 'for 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 corresponding Designated Performance Feature (DPF 1.1) identifies land uses that are considered appropriate for the Zone:

DTS/DPF 1.1: *Development comprises one or more of the following:*

- » *Amenity block*
- » *Caravan permanently fixed to land*
- » *Community facility*
- » *Detached dwelling*
- » *Indoor recreation facility*
- » *Outbuilding*
- » *Residential Park*
- » *Shop*
- » *Office*
- » *Tourist accommodation*

As set out in the 'Guide to the Planning and Design Code, June 2022', the 'Residential Park Zone' is intended to be applied to areas subject to the *Residential Parks Act, 2007*. Part 7 of the Planning and Design Code defines a '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. It is the Designated Entity's intention to expand the existing 'Residential Park' facility to the Affected Area as the existing facility is at capacity and the operator is experiencing substantial demand for additional accommodation.

Performance Outcome 2.1 of the 'Residential Park Zone' seeks that *'no additional allotment(s) are created wholly or partly within the zone except where a lease or license agreement is made, granted or accepted under the Residential Parks Act, 2007'*. This policy outcome has the effect of limiting the range of residential development types that are appropriate within the Zone, such as limiting subdivision into individual dwelling allotments not related to a 'Residential Park' type of residential living.

The corresponding site dimensions and built-form and character performance outcomes support development for a 'Residential Park' and include policy guidance to ensure a robust assessment of the spatial layout and achievement of an appropriate level of amenity and quality of living environment.

The Affected Area is well positioned adjacent to the existing Residential Park and Tourism Development Zone, accordingly the extension of the 'Residential Park Zone' to the Affected Area is a logical expansion that will facilitate additional living opportunities for affordable retirement and lifestyle accommodation for over 50s.

Northern portion of CT5693/461

The section of the CT5693/461 (refer to Figure 3.2 above) has an east-west dimension of just under 60 metres and north-south dimension of around 215 metres. These dimensions would make it difficult to construct new housing with an efficient layout that can also provide satisfactory interfaces with the adjacent properties within the Rural Living either side of the Affected Area.

On this basis, the Designated Entity is not seeking to rezone this section of the Affected Area as part of this Code Amendment.

Policy Response to Suitability of the Residential Park Zone Investigations

Accordingly, the Code Amendment for the 'Residential Park Zone' is preferred in this instance, providing a policy framework that will facilitate the redevelopment of the Affected Area in a manner that will suit a 'Residential Park' style of living with a dwelling type, scale and density that is suitable within the locality

5.6.4. Traffic and Access

Empirical Traffic Advisory (ETA) has prepared a Transport Impact Assessment considering the proposed Code Amendment (see **Appendix H**).

The ETA assessment has considered the anticipated transport implications of the proposed Code amendment including consideration of:

- Anticipated uses in the Affected Area – being approximately 170-200 dwellings for senior living in a similar form and density to the existing neighbouring Lakeside Goolwa 'Residential Park' site;
- Existing traffic and parking conditions surrounding the Affected Area;
- Traffic demands of the anticipated uses;
- Possible access arrangements for the Affected Area;
- Transport impact of the intended Policy on the surrounding road network; and
- Suitability of the policy framework to cater for anticipated uses.

Traffic Generation

ETA have undertaken traffic surveys (in December 2023) to estimate daily traffic volumes in the surrounding road network. The estimated daily traffic volumes are shown in **Figure 5.2** below:



Figure 5-2 - Existing Traffic Volumes (Source: ETA Traffic Survey, Dec 2023)

ETA have identified that based on the anticipated maximum of 200 new dwellings, the traffic generation would be 420 vehicles per day and 80 trips per hour during the peak hour (using the NSW Roads and Maritimes Services 'Guide to Traffic Generating Developments' (2002 Road Traffic Authority as updated), and 'Updated Traffic Surveys' (2013). Predicted increased in daily traffic volumes in surrounding streets is illustrated in **Figure 5.3** below.

All streets will remain well below 1,000 vehicles per day except for Liverpool Road which is a main collector road for the area and is already above 1,000 vehicles per day. Given the existing residential park traffic patterns where the daily vehicle trips are spread throughout the day, and do not typically occur in the road network peak periods (i.e. 8-9am and 5-6pm), the predicted traffic volumes will not be noticeable within the existing traffic using the streets.

The existing and predicted low traffic volumes will not require any upgrades from the existing capacity available in the road network, or at any of the existing intersections which can remain in existing form (unsignalised). There is ample spare capacity within the existing road network to accommodate the predicted traffic volumes.



Figure 5-3 - Predicted Traffic Volumes

Cycling

ETA have identified that there are no dedicated cycle lanes within the local road network. Given the low volume of traffic on the road network, ETA have advised that cyclists can use the local road network as required. The Encounter Bikeway includes a shared path adjacent to Liverpool Road, that commences at the intersection with Howell Street, adjacent to the Goolwa North public boat ramp, 600m south of the Affected Area. The Encounter Bikeway is a 30km long on-road and shared path trail that links the coastal towns of Goolwa, Port Elliot, Middleton and Victor Harbor, providing a recreational route for cyclists and walkers that will be easily accessible to residents of the future Residential Park.

Pedestrians

ETA have identified that a footpath exists on the southern side of Banfield Road to the west of Noble Avenue up to Saratoga Drive. No other footpaths are located in the general vicinity.

It is understood that a footpath network for pedestrians and cyclists could be developed to link to the existing Lakeside Goolwa residential park, via a route to the east along the creek frontage. This would enable safe access between the sites without the need to use public roads.

Parking

ETA have reviewed the likely parking requirements for the anticipated uses against the relevant code policies in Part 4 – General Development Policies section of the Code and have not found any specific policies which would be problematic for the anticipated uses in the Affected Area. ETA have identified that given the size and layout of the Affected Area, it is likely that these policies can generally be satisfied with development in the Affected Area and the parking rates in the Code will be suitable for consideration of the anticipated uses in the Affected Area.

Summary of Findings

The ETA assessment has concluded that:

- Access is envisaged directly to Banfield Road, with emergency access from Fidock Road;
- Traffic surveys of the existing road network indicates there is ample spare capacity in the road network and intersections for traffic associated with the Affected Area.
- The anticipated uses in the Affected Area will generate up to 420 vehicles per day which will be distributed between Banfield Road and Noble Avenue. This will have a very minor impact on traffic volumes on the local road network, with no changes or upgrades to the local roads required as a result of rezoning.
- A review of the Planning and Design Code policies relevant to the likely zoning has not found any specific policies which would be problematic for the anticipated uses in the Affected Area.
- Given the size and configuration of the Affected Area, it is likely that these policies can generally be satisfied with development in the Affected Area.
- Overall, the development that will be facilitated by the proposed rezoning will have only a very minor impact on traffic volumes on the adjacent road network.

Policy Response to Traffic & Access Investigations

Based on the investigations undertaken, it has been found that the proposed Code Policies (including the proposed Residential Park Zone, current Overlays and current General Development Policies) are sufficient to allow an adequate assessment of traffic and parking matters for a future development proposal on the Affected Area

5.6.5. Bushfire

Grant Fleming Environmental (GF Environmental) has completed a Bushfire Development Assessment (BDA) (included as **Appendix G**) of the proposal to rezone the land from 'Rural Living' Zone to 'Residential Park' Zone. The report assesses the proposed rezoning in the context of the requirements of the Hazards (Bushfire – Medium Risk) Overlay under the P&D Code of the PDI Act and Government of South Australia (2020) *Ministerial Building Standard MBS 008*.

A preliminary risk assessment identified the presence of Classified Vegetation - Grassland (G) in accordance with AS3959:2018 located within 100 m surrounding the site with the exception of the land to the south of Banfield Road that is an established residential area. The Grassland (G) to the west of the site included the presence of olive orchards that increases the flammability. There is no separation distance from the Classified Vegetation along the western and northern perimeter.

Figure 5.4 below identifies the calculated Building Attack Level (BAL) for the Affected Area. A BAL is a method for rating the intensity of a location's exposure to bushfire. The GF Environment Report identifies that along the northern and western boundaries a BAL-FZ applies. The report identifies that the BAL can be reduced from BAL-FZ (which is the highest level of bushfire exposure) to BAL19 with the application of a 15m Vegetation Management Zone, as shown on **Figure 5.5**. An additional 2m of separation would then reduce the BAL to 12.5.

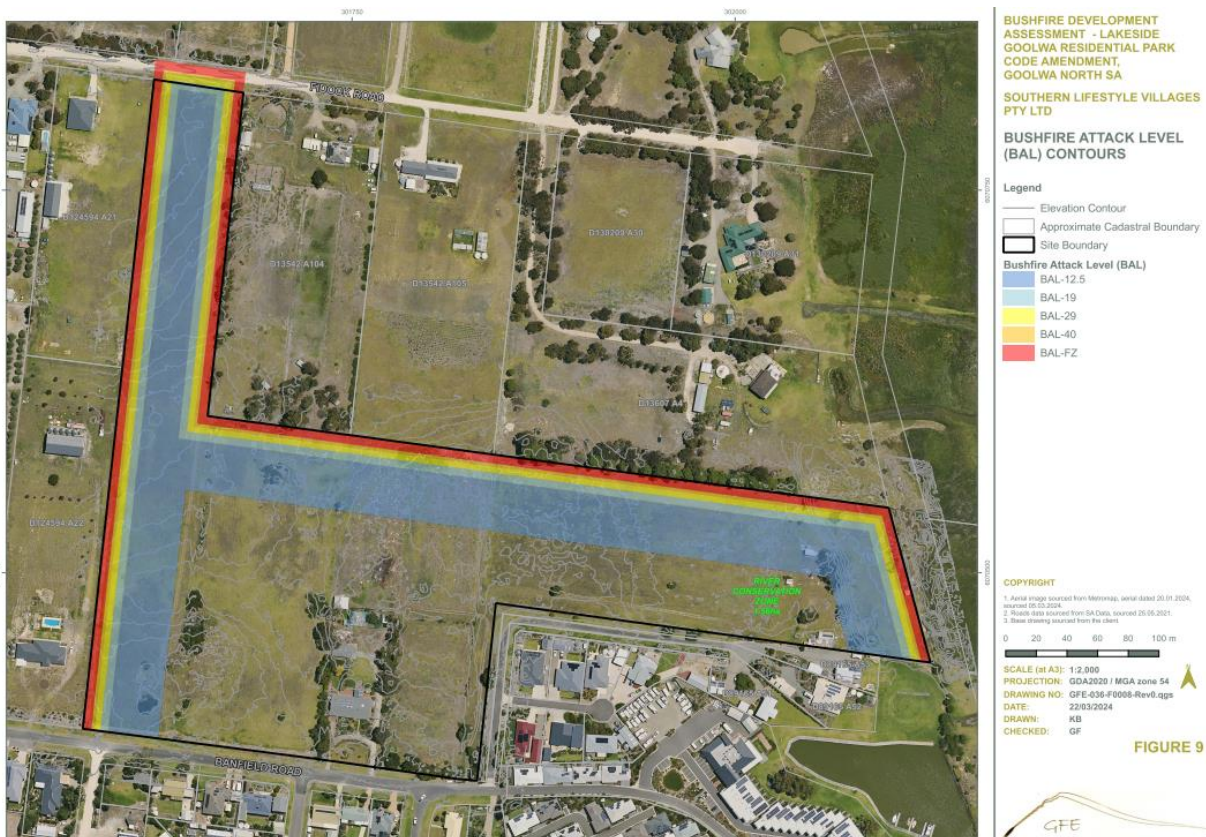


Figure 5-4 - Bushfire Attack Level (BAL)



Figure 5-5 - Fire Management Zones

GF Environmental has made a number of recommendations in relation to the Code Amendment and for future development as a Residential Park with regard to bushfire safety and preparedness. How the recommendations have informed the Code Amendment is outlined in Table 5.2 below:

Table 5-2 – GF Environmental recommendations

	Recommendation	Code Amendment Response
1	<p>Remove the piled flammable material from the site or if this is not practicable break up the mounded material into smaller polies following CFS guideline.</p> <p>Request Goolwa CFS attendance when the piled material is to be burnt due to inherent risk.</p>	<p>This is a site management obligation on the landowner that is separate to the Code Amendment process.</p> <p>It is noted that it is common approach to maintain vegetation across a property of this nature, as evident across the locality – with the material only being in located for a short duration at the time of inspection by GE Environmental.</p>
2	<p>Future development is to design the access network to incorporate perimeter access, that is, position access between Ground leases and Classified Vegetation.</p> <p>Future development is to design the access network to enable continuous forward movement for emergency service vehicles.</p> <p>Future development is to design any no-through access within the Residential Park with an acceptable turning treatment.</p> <p>Future development is to design access or fire break (pathway with VMZ) between any reserves and Ground lease.</p>	<p>The Affected Area is of adequate size and dimensions to enable these future design requirements to be met.</p> <p>The Code Amendment does not propose to rezone to northern section of CT5693/461 which extends to Fidock Road, where the ability for future development to provide an appropriately designed access network and separation distances along boundaries (as per Recommendation 3 below) would likely be compromised.</p>
3	<p>Design the Residential Park to establish a minimum separation distance of 15m along the western, north-western, northern, north-eastern perimeters in order to achieve a BAL rating of BAL 19 or BAL 12.5.</p>	<p>Noted. Any future development will be subject to planning and building requirements that meet the current bushfire restrictions at the time, as informed by future specialist bushfire advice.</p>
4	<p>Establish a 5m wide fire break (bare earth) along the southern perimeter (Banfield Road) and extend it around the existing residence while the residence remains.</p>	<p>The Code Amendment supports this outcome.</p>
5	<p>Establish a 30m Asset Protection Zone or other mechanism along the eastern perimeter (Currency Creek) with the Conservation Zone to be managed as a Bushfire Buffer Zone.</p>	<p>The Code Amendment does not propose to rezone or amend any applicable policies (including any Bushfire Overlays within the Code) and the Affected Area does not include the portion of land within the Conservation Zone.</p>

	Recommendation	Code Amendment Response
6	Establish a 15m Asset Protection Zone along the western, north-western, northern, north-eastern perimeters with grass to ≤ 10 cm height for the duration of the Fire Danger Season. (Grassland Fuel Hazard Score at 70% cured should be ≤10, Table 2).	The Code Amendment supports this outcome being achieved in future development. The portion of the Affected Area proposed to be rezoned to the Residential Park Zone could meet these requirements as part of a future development.

Policy Response to Bushfire Management Investigations

The Code Amendment does not propose to rezone the northern section of the land that extends to Fidock Road. The Bushfire Assessment identifies that due to the dimensions of this section of the Affected Area, the opportunity for future development for purposes of housing associated with the Residential Park may be compromised by the required setbacks to provide an acceptable BAL for future development (until such time that surrounding land is rezoned and developed for housing i.e. redevelopment of existing rural living allotments for urban development)

5.6.6. Interface Management

As part of preliminary consultation with Alexandrina Council, the following comments were provided for consideration as part of the investigations relevant to interface matters:

“The Affected Area lies between two areas that currently accommodate vastly different densities of development, with the Rural Living Zone to the North-west and the Residential Park Zone to the south-east. Careful consideration must be given to whether the density of development that could result from the proposed Code Amendment is appropriate and whether or not it would bring rise to interface issues. An increased density of development may have serious implications beyond the site in relation to biodiversity values, hydrology and function of the nearby coastal setting. Any development of the Affected Area would need to consider large buffers between that and the adjoining Conservation Zone.”

The Affected Area is currently zoned Rural Living Zone and shares a boundary with the Conservation Zone, Tourism Development Zone and Neighbourhood Zone. For parts of the Affected Area where this Code Amendment does not propose any change in zoning, the policy guiding interface considerations for future development remains the same.

The Code Amendment will change this arrangement such that the Rural Living Zone would share a boundary with the Residential Park Zone rather than the Tourism Development Zone. Both Zones seek a similar style and form of development.

The land adjoining the northern boundary of the Affected Area contains rural living allotments where the dwellings are located approximately 170 metres from the boundary. To the west, the existing allotments are occupied by dwellings and associated outbuildings.

The Code contains a number of existing policies in the General Development Policies module that seeks that new development mitigates adverse effects on or from neighbouring and proximate land uses. The key policies include:

- Residential Park Zone:
 - PO3.3 – Setbacks from public roads

- PO3.4 – Setbacks from neighbouring properties
- GDP Module: Design in Urban Areas:
 - DO1 Desired Outcome
 - PO1.1 & 1.2 General Land Use Compatibility
 - PO6.1 Light Spill
 - PO9.1 – 9.7 Interface with Rural Activities which seek:
 - » New sensitive receivers (e.g. housing in a Residential Park) do not prejudice the continued operation from lawfully existing (or approved) horticultural and farming activities (PO 9.1);
 - » Setbacks and vegetation plantings along allotments boundaries to mitigate the potential impacts of spray drifts and other impacts associated with agricultural and horticultural activities (PO 9.6);
 - » Urban development not prejudice agricultural and horticultural activities through appropriate separation and design techniques (PO 9.7).

Given the land uses and layout of adjoining properties, these policies are considered sufficient to provide a satisfactory interface for future development with adjoining land.

Policy Response to Interface Management Investigations

The proposed Code Amendment includes sufficient policies to enable a robust assessment of interface impacts on land adjoining the Affected Area as part of future development applications.

5.6.7. Flora & Fauna

Grant Fleming Environmental (GF Environmental) has prepared a Flora and Fauna Assessment (included as **Appendix F**) with the purpose of identifying if native vegetation is present on the site and if any threatened species of flora and fauna at the state or national level are likely to be present.

The GF Environmental Report presents the findings of a desktop review of literature and databases and a site assessment of flora and fauna conducted on 21 December 2023. Prior to European settlement the site would have supported an *Allocasuarina 42erticillate* (Drooping Sheoak) Low Woodland. No native vegetation associations were found to exist at the site and while some native species were present, they did not meet the threshold to be designated native vegetation under the *Native Vegetation Act, 1991 (SA)*. Scattered native trees at the site were determined to have been planted and are therefore not afforded protection under the *Native Vegetation Act, 1991*. No threatened plant species were observed at the site and are considered unlikely to occur given vegetation clearance and the prolonged level of disturbance associated with cropping at the site. Three species listed as Weeds of National Significance namely; **Lycium ferocissimum* (African Boxthorn), **Asparagus asparagoides* (Bridal Veil Creeper) and **Tamarix aphylla* (Tamarisk) were present at the site. Numerous plant species were found to have spread into the paddock from the garden surrounding the residence at 6-8 Banfield Road.

No threatened fauna were located at the site, although it is considered that *Calyptorhynchus funereus* (Yellow-tailed Black Cockatoo) listed as Vulnerable under the *National Parks & Wildlife Act, 1972 (SA)* are likely to forage amongst the pine trees located on the adjoining property. Two immature *Elanus axillaris* (Black-shouldered Kites) were observed using the trees near the eastern residence and retention of these trees is recommended to support these birds within the conservation zone.

Of the species listed within the EPBC Act MNES search of the buffered site those that may utilize the *Phragmites australis* (Common Reed) fringing wetland may forage along the far eastern edge of the site. Listed species with the potential to occur at the site include *Botaurus poiciloptilus* (Australasian Bittern), *Gallinago hardwickii* (Latham's Snipe), *Rostratula australis* (Australian Painted Snipe), *Ardea intermedia plumifera* (Plumed Egret) and *Egretta garzetta nigripes* (Little Egret). The site itself does not offer primary habitat for these species.

The opportunity exists to facilitate revegetation or to allow natural regeneration of the fringing wetland plant community adjacent to the eastern boundary of the site that is a RAMSAR listed wetland of international significance.

The potential exists to utilise the conservation zone for passive recreational activities such as bird watching and this could include construction of a hide and associated boardwalk. The conservation zone could become a significant environmental asset to the Residential Park and landscaping should consider creating habitat for woodland birds by incorporating constituent native plant species of the pre-European settlement *Allocasuarina verticillata* (Drooping Sheoak) Low Woodland.

The GF Environment Report offers the following recommendations:

- Implement pest and weed control measures across the site;
- Remove the pile of vegetation cuttings and waste material as soon as practicable as it may present as a fire hazard and likely harbors pests;
- Revegetate or facilitate natural regeneration of the fringing wetland at the eastern boundary of the site;
- Incorporate *Allocasuarina verticillata* (Drooping Sheoak) Low Woodland constituent native plant species to create habitat for Woodland birds within the conservation zone and site landscaping.
- Retain existing trees near the residence at eastern end of the site to support the pair of immature *Elanus axillaris* (Black-shouldered Kites)

Policy Response to Flora & Fauna Investigations

The rezoning has excluded land to the east of the Affected Area located within Conservation Zone, which supports the protection of existing and opportunities for revegetation and regeneration of native vegetation fringing the wetland.

Other recommendations relating to implementing pest and weed control management measures, removing waste material and recommendations on future landscape selection are outside planning controls.

The Code Amendment retains the existing application of the Native Vegetation Overlay for future development on the Affected Area.

5.6.8. Services and Infrastructure

As part of the 'Proposal to Initiate' stage of the Code Amendment, the Minister approved the initiation of the Code Amendment subject to the following condition:

"Prior to approval 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."

Greenhill Engineers Pty Ltd have undertaken infrastructure and stormwater management investigations with their report included as **Appendix I** and summarised in Section 5.5 above.

In summary, the investigations have generally found that:

- Connection to existing services infrastructure is available with further investigation required to confirm services infrastructure network capacity, and any augmentation requirements that may be required. This can occur at the time of development application.
- Stormwater runoff from future development of the Affected Area will require stormwater drainage and stormwater management systems to enable stormwater runoff to be retained and detained on-site, with stormwater outflow from the majority of the Affected Area to be directed to the existing Lakeside Goolwa site and Marina. A combination of underground stormwater drainage pit and pipe systems, vegetated swales, bioretention basin/s, a stormwater pond system or wetland, will be required to meet with recommended urban 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.

Policy Response to Services and Infrastructure Investigations

The Affected Area has access to existing services infrastructure that will, or can be augmented, to service the likely future development of the Affected Area.

5.6.9. Aboriginal Sites & Objects

As part of the investigations (refer to **Attachment E**), an Aboriginal Heritage Sites and Objects Report from the 'Heritage Information Team, Aboriginal Affairs & Reconciliation' has been obtained.

The Report has identified the following for each land parcel within the Affected Area:

Land Parcel	Registered Aboriginal Sites or Objects								
4 Banfield Road, Goolwa North (CT Ref: 6095/954)	<p>Has the following entry at this location:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #004a33; color: white;">Map Number</th> <th style="background-color: #004a33; color: white;">Site Number</th> <th style="background-color: #004a33; color: white;">Site Type</th> <th style="background-color: #004a33; color: white;">Site Status</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">6626</td> <td style="text-align: center;">4727</td> <td style="text-align: center;">Cultural</td> <td style="text-align: center;">Registered</td> </tr> </tbody> </table> <p>The approximate site entry location (hashed green) is identified in relation to the 4 Banfield Road on the map below:</p>	Map Number	Site Number	Site Type	Site Status	6626	4727	Cultural	Registered
Map Number	Site Number	Site Type	Site Status						
6626	4727	Cultural	Registered						

Land Parcel	Registered Aboriginal Sites or Objects
-------------	--

Reference Number: 6061
 Buffer Distance (m): 0



The site is identified as “*Meeting of the Waters*” and is described as a cultural site which includes the Goolwa Channel and pre-barrage, tidal reaches of the Finnis River and Currency Creek, extends to the Murray Mouth and entrances to Lake Alexandrina and the Coorong. The Report advises that sites or objects may exist in the proposed development area, even though the Register does not identify them.

The report identifies that land within 200 metres of a watercourse (for example the River Murray and its overflow areas) in particular, may contain Aboriginal sites or objects.

6 Banfield Road, Goolwa North (CT Ref: 5062/315)	No entries for this location
12 Banfield Road, Goolwa North (CT Ref: 5692/583)	No entries for this location
16 Banfield Road, Goolwa North (CT Ref: 5693/461)	No entries for this location

In relation to 4 Banfield Road, Goolwa North, the Code Amendment does not propose to rezone the eastern portion of the land that currently zoned ‘Conservation Zone’, which extends by a distance of approximately between 130-160 metres from the identified watercourse. Noting the advice above that land within 200 metres of a watercourse in particular may contain Aboriginal sites or objects, that means an area extending approximately a depth of 40-70 metres from the boundary of the Conservation

Zone is proposed to be rezoned to Residential Park Zone. This area has been cleared of vegetation and used for farming and agriculture.

Rezoning of this land does not alter the obligations that may arise should any Aboriginal sites or objects be identified in the future. The Designated Entity understands that although the Register does not identify any known sites or objects, they may exist within the Affected Area and are protected under the *Aboriginal Heritage Act, 1988*.

Policy Response to Aboriginal Heritage Investigations

The findings of the Aboriginal heritage search and investigations do not preclude the rezoning of the Affected Area to the Residential Park Zone.

5.6.10. Environmental (Site Contamination)

Toby Carter Consulting has prepared a Preliminary Site Investigation (PSI) considering the proposed Code Amendment seeking to change the zoning of the Affected Area to allow for future residential development. The report from Toby Carter Consulting is included as **Appendix J**. We note the report includes the whole of the parcel of land at 4 Banfield Road, despite the portion of land within the Conservation Zone being excluded from the rezoning and outside of the Affected Area.

The investigations have identified that the history of the Affected Area is relatively well understood. The Affected Area is likely to have been vacant land and/or potentially used for broadacre agriculture or grazing of livestock until the late 1970s. A portion of the Affected Area was used for the growing of fruit or olive trees from this time potentially until 2010. Since 2010 the Affected Area appears to have been vacant (with the exception of the residential dwellings) There is no evidence to suggest that any activities have historically occurred at the Affected Area that would warrant consideration as a Class 2 Agricultural activity as described in Schedule 1 of *Practice Direction 14: Site Contamination Assessment*. No current Potentially Contaminating Activities (PCAs), listed in Schedule 1 of *Practice Direction 14: Site Contamination Assessment* have been observed at the Affected Area.

For the area surrounding the Affected Area (and within 200m), the investigations have observed the area to have been largely vacant land and/or potentially used for broadacre agriculture or grazing of livestock, similar to the Affected Area. This has included the occasional growing of olive or fruit trees from the 1970s. Residential development commenced in the surrounding area in the 1970s and this has continued to the current day, with denser housing to the south of the Affected Area. In particular, no PCAs listed in Schedule 1 of the Practice Direction were identified on adjacent land (i.e. within 60 m) or within 200 m of the Affected Area.

The Preliminary Conceptual Site Model has not highlighted contamination risks at the Affected Area that are unmanageable and in turn, that are significant enough that the Affected Area cannot be made suitable for residential development in the context of the proposed Policy.

The following conclusions are made by Toby Carty Consulting with respect to the suitability of the future use of the Affected Area for residential purposes and the likelihood of site contamination:

“While the PSI has highlighted prior activities at the Affected Area (agricultural use) that represent potentially contaminating activities (PCAs), these PCAs are considered to be of low risk with respect to contamination.

With the above in mind, the land is considered suitable for a Code Amendment that supports the proposed Residential Park policy and associated uses”.

“In light of conclusions regarding suitability of the Affected Area for the proposed Code Amendment and that contamination will be considered in accordance with the above referenced ‘formalised process’ at Development Application stage, no further contamination investigations are proposed in support of the Code Amendment.”

Policy Response to Site Contamination Investigations

The Affected Area is suitable for purposes of the Residential Park Zone and intended future development.

5.6.11. Recommended Policy Changes

Following is a list of the recommended policy changes which are proposed in response to the investigation undertaken in support of this Code Amendment:

- Rezone portion of the Affected Area from **Rural Living Zone** to **Residential Park Zone** (excluding the 1.2 ha section of the Affected Area with frontage to Fidock Road).
- Removal of existing ‘Minimum Site Area’: TNV as it is associated with the Rural Living Zone.

6. REFERENCES

Strategic Documents

- Attorney Generals Department, 2023, Land Supply Report for Greater Adelaide: Residential, website: https://plan.sa.gov.au/state_snapshot/land_supply/urban-infill-land-supply, published by the Government of South Australia;
- State Planning Commission, 2023, Greater Adelaide Regional Plan: Discussion Plan, website: <https://plan.sa.gov.au/regional-planning-program/about-the-greater-adelaide-regional-plan>, published by the Government of South Australia;
- Attorney Generals Department, 2021, Land Supply Report for Greater Adelaide: Growth management program, website: Land supply reports for greater Adelaide, published the Government of South Australia;
- Attorney General's Department, 2017, The 30-Year Plan For Greater Adelaide (2017 Update), website: <https://livingadelaide.sa.gov.au/>, published by the Government of South Australia;
- Department for Trade & Investment, Plan SA, Guide to the Planning and Design Code, June 2022, published by the Government of South Australia
- State Planning Commission, 23 May 2019, State Planning Policies for South Australia, website link: https://plan.sa.gov.au/resources/planning/state_planning_policies, Published by the Government of South Australia;
- Alexandrina Council, Strategic Management Plan, Alexandrina 2040, website link: https://www.alexandrina.sa.gov.au/_data/assets/pdf_file/0037/848773/A2040_Narrative.pdf
- Alexandrina Council, 2021, Economic Development Strategy 2022-2027, website link: https://www.alexandrina.sa.gov.au/_data/assets/pdf_file/0033/1078089/Economic_Development_Strategy_v6_WEB.pdf
- Southern & Hills Local Government Association, 2022, Regional Public Health and Wellbeing Plan 2022-2027 , website link: <https://www.lga.sa.gov.au/southern-and-hills-lga/reports-and-publications/regional-public-health>
- Alexandrina Council, 2022, Community Wellbeing Action Plan, website link: https://www.alexandrina.sa.gov.au/_data/assets/pdf_file/0019/1226134/Community_Wellbeing_Plan_v9_WEB.pdf
- [State-wide Bushfire Hazards Overlay Code Amendment - for consultation \(plan.sa.gov.au\)](#)

Technical Reports and Investigations

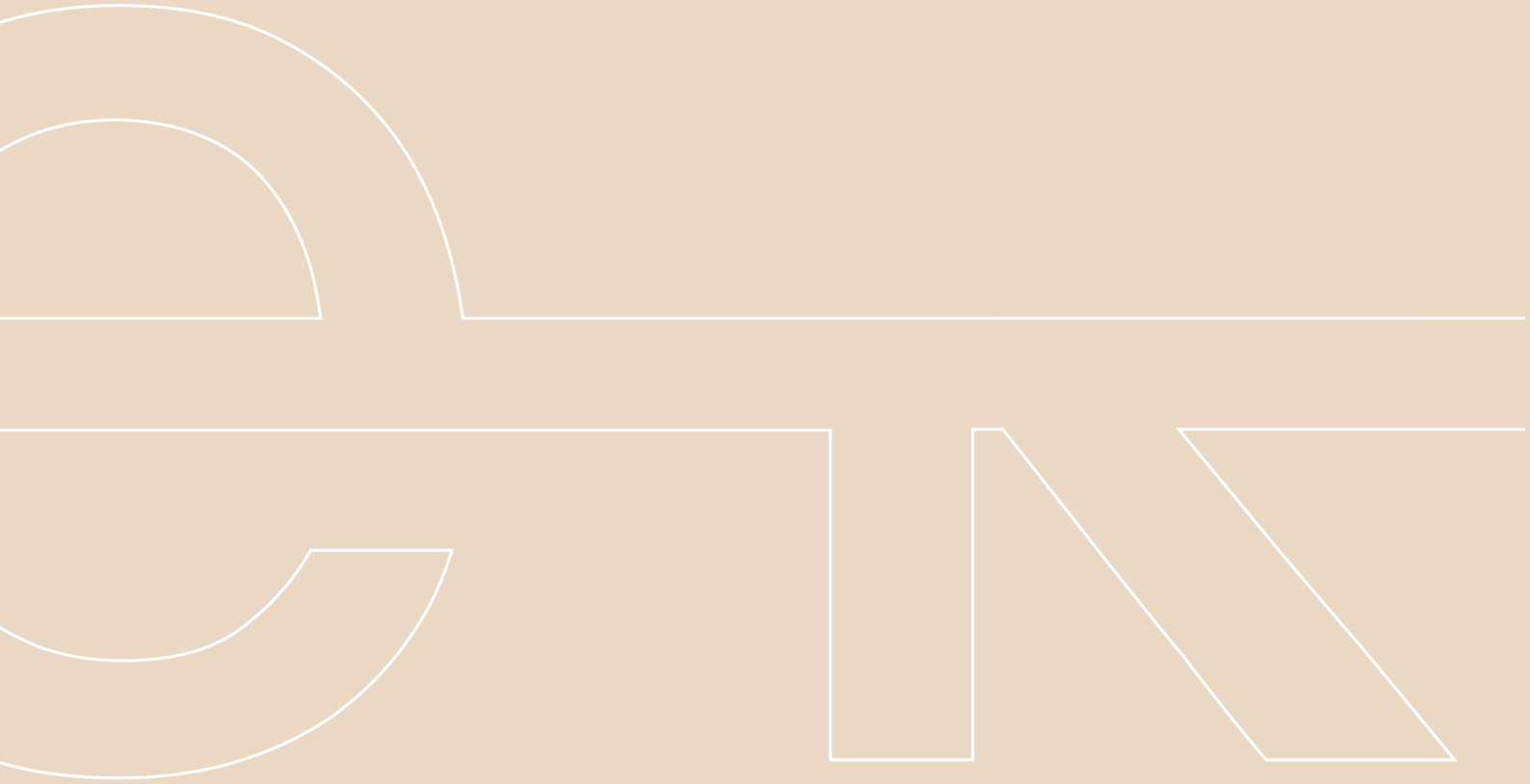
- Greenhill Engineering, 30 April 2024, Services Infrastructure and Stormwater Management Investigations
- Empirical Traffic Advisory, 12 February 2024, Transport Impact Assessment, Lakeside Goolwa Code Amendment, 4-16 Banfield Road, Goolwa North Published by: Empirical Traffic Advisory, Adelaide, SA;
- Grant Fleming Environmental, 16 April 2024, Bushfire Development Assessment – Lakeside Goolwa, Goolwa North.
- Grant Fleming Environmental, 17 March 2024, Flora & Fauna Assessment – Lakeside Goolwa Residential Park Expansion, Goolwa North
- Toby Carter Consulting, 11 January 2024, Preliminary Site Investigation for Code Amendment. Published by: Toby Carter Consulting, SA, Adelaide; and

- Heritage Information Team, Aboriginal Affairs & Reconciliation, 26 October 2023, Aboriginal Heritage Sites report. Published by: The Heritage Information Team, Aboriginal Affairs & Reconciliation (Government of South Australia).

A large, decorative white line graphic is positioned on the left side of the page. It starts with a semi-circle at the top, followed by a horizontal line, then a vertical line, and finally a series of geometric shapes including a trapezoid and a parallelogram, all connected by a continuous white line.

ATTACHMENT A

Map of Affected Area



A large, decorative white line graphic is positioned on the left side of the page. It starts with a semi-circle at the top, followed by a horizontal line, then a vertical line, and finally a series of diagonal lines forming a stylized 'N' shape.

ATTACHMENT B
Current and Proposed
Policy

A large, white, stylized graphic element consisting of several connected shapes: a semi-circle on the left, a horizontal line extending to the right, a vertical line, a trapezoid, and another semi-circle on the far left. This graphic is positioned behind the title text.

ATTACHMENT C
Current and Proposed
Mapping

A large, white, stylized graphic element consisting of a horizontal line that curves upwards on the left, then continues horizontally, then drops vertically, then rises diagonally, and finally drops vertically again on the right. This graphic is positioned behind the title text.

ATTACHMENT D
Strategic Planning
Outcomes

A large, decorative white line graphic that starts as a semi-circle on the left, transitions into a horizontal line, and then forms a series of geometric shapes including a semi-circle, a vertical rectangle, and a trapezoid on the right side.


ATTACHMENT E
Investigation –
Aboriginal Heritage Sites
and Objects

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ATTACHMENT F
Investigation – Flora &
Fauna

A large, white, stylized graphic element is positioned on the left side of the page. It features a semi-circle at the top, a horizontal line extending to the right, and a large, open 'U' shape below it. To the right of the 'U' shape, there is a vertical line, followed by a diagonal line sloping down to the right, and finally a horizontal line at the bottom right.


ATTACHMENT G
Investigation – Bushfire

A large, white, stylized graphic element on the left side of the page, resembling a partial 'S' or a series of connected curves and straight lines.

ATTACHMENT H
Investigation – Traffic &
Access

A large, white, stylized graphic element on the left side of the page. It consists of several connected shapes: a semi-circle at the top, a horizontal line, a vertical line, a trapezoid, and another semi-circle at the bottom, all connected by thin white lines.

ATTACHMENT I
Investigation – Services
Infrastructure &
Stormwater
Management

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ATTACHMENT J

Investigation - Site Contamination