



Government
of South Australia

The Hon Stephan Knoll MP
Member for Schubert

FOI Ref: SKNOLL182262

Ms Anne Highet
PO BOX 7126
ADELAIDE SA 5001

Dear Ms Highet

On 17 January 2020, the Office of the Minister for Transport, Infrastructure and Local Government, Minister for Planning received your initial application made pursuant to the *Freedom of Information Act 1991* (the Act) for access to:

"Submission made by Town of Gawler to Minister of Planning in response to the Concordia - Business Case to Support Precinct Declaration (Concordia Land Management, Dec 2018) released for consultation pursuant to Urban Renewal Act 1995 section 7 (H)(3) on 27 October 2019. Submission is likely to be dated between 18-20 December 2019."

Your application for internal review was received on 18 February 2020.

A search of documents held by the Office of the Minister for Transport, Infrastructure and Local Government, Minister for Planning was undertaken. I wish to advise that one document has been identified within the scope of your request.

I have determined to release Document 1.

Attached is an explanation of the provisions of the Act which details your rights to review and appeal this determination, and the process to be followed.

If you have any questions in relation to the matter, please contact the Freedom of Information Officer on telephone (08) 7109 4830 or via email at ministerknoll@sa.gov.au.

Yours sincerely

HON STEPHAN KNOLL MP
PRINCIPAL OFFICER
MINISTER FOR TRANSPORT, INFRASTRUCTURE AND LOCAL GOVERNMENT
MINISTER FOR PLANNING

5/3 /2020

Encl:
Your rights to review and appeal this determination
Schedule of documents

Minister for Transport, Infrastructure and Local Government
Minister for Planning

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SCHEDULE OF DOCUMENTS – FREEDOM OF INFORMATION INTERNAL REVIEW
NUMBER – SKNOLL182262

Document Number	Description	Date	Release Determination	Schedule Clause
1	Email with attachment	18/12/19	Release	

DPTI:Minister Knoll

From: David Petruzzella <David.Petruzzella@gawler.sa.gov.au>
Sent: Wednesday, 18 December 2019 4:14 PM
To: DPTI:Minister Knoll; Allen, Anita (DPTI)
Cc: Henry Inat; Ryan Viney; Jane Strange
Subject: Concordia - Business Case - Town of Gawler Feedback - Attention Anita Allen
Attachments: Signed Letter to Minister Knol~ Business Case - December 2019.pdf

Dear Minister Knoll

Please find attached Council's feedback in relation to the business case lodged by Concordia Land Management.

A hardcopy has also been sent today via post.

Kind Regards

David Petruzzella | Strategic Planner
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Contact: Mr. Viney

Ref: KR:dp
CC16/1342



18 December 2019

Stephan Knoll MP
Minister for Transport, Infrastructure and Local Government
Minister for Planning
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Dear Minister Knoll

Re: Concordia - Business Case to Support Declaration

Thank you for the opportunity to provide feedback with regard to the Business Case lodged by Concordia Land Management (CLM), which is seeking support for the establishment of a Precinct Authority pursuant to the *Urban Renewal Act 1995*.

Due to the scale and proximity of the proposed development at Concordia, the Town of Gawler (Council) has a strong interest in its development. Once urbanised and as stated in the supporting material, Concordia will form a natural extension to Gawler and is anticipated to ultimately double our current population. Residents will likely identify themselves as part of the Gawler community and, as a result, Council wishes to ensure that we are appropriately represented throughout this process.

Council wishes to state that it is not fundamentally opposed to the notion of a Precinct Authority, which in this instance, is proposed to be the establishment of a corporation pursuant to Section 8(1)(a) of the *Urban Renewal Act 1995* to guide the future development of Concordia. However, there are a number of concerns which Council has in terms of the model being presented. Furthermore Council is seeking clarification as to which section of the *Urban Renewal Act 1995* has satisfied the Minister to enable this application for a Precinct Authority.

Key Points:

- Proposed governance model
- Role of authority
- The roles of the panels
- Reporting structure
- Funding
- Service provision arrangement
- Ongoing management

Please find below Council's response with respect to the Business Case:

Proposed Governance Model

Concordia is one of the most significant (unzoned) metropolitan fringe/township growth areas defined in the 30 Year Plan for Greater Adelaide 2017. This growth area is approximately 978 hectares in size and is anticipated to yield up to 10,500 allotments and a population of approximately 23,000 people. As stated above the Concordia development will form a natural extension of our township and its community will become part of Gawler. The development will leverage off the facilities and amenities currently available in Gawler as it grows and it is the desire of Council to see a truly integrated development transpire, which in fact seeks to strengthen the Town of Gawler rather than simply being tacked on. As a result and as previously communicated, Council believes that it should have greater representation at all levels of governance.

Authority Composition

At present CLM are proposing a three (3) member board including a chairperson, comprising persons with demonstrated skills and experience in urban development, local government, finance, engineering, governance, planning, law, asset management, major projects and property economics.

In terms of a quorum the business case states the following, "A quorum will be half the members rounded down to the nearest number plus one". In essence this means that a quorum can be achieved with two members.

A three member board appears to be the preferred approach for CLM as they advocate the most efficient and effective authorities to be ones that can regularly attain a quorum.

It is the understanding of Council that through previous deliberations between CLM and the Barossa Council, the Barossa Council are opposed to this approach and have proposed a five member board. CLM have previously reiterated that they are open to the authority comprising five members however, they have flagged concern with the potential costs involved.

Council agrees with the Barossa Council on this matter and considers a five (5) member board to be more appropriate. This is due to following:

1. Efficiencies in terms of achieving a quorum are unlikely to be effected.
2. The additional costs involved with a five member board are irrelevant in a project which is proposing to contribute \$9.4 billion in Gross State Product.
3. A five member board will provide a greater knowledge base which will benefit the project.
4. A five member board provides greater assurance in terms of transparency.
5. In terms of achieving a quorum, if the same approach were adopted where "A quorum will be half the members rounded down to the nearest number plus one" this would equal three. This is considered more appropriate and balanced than a quorum of two.

Authority members are to be appointed by the Governor and it is proposed that the Minister, the proponent and the Barossa Council will all be afforded the opportunity to provide a short list (no more than three) of nominees for consideration. It is disappointing that there remains no mention of the Town of Gawler in this process. Council is requesting that the Town of Gawler be afforded the same opportunity to provide a short list to the Governor for consideration. Furthermore, Council considers it appropriate for each of the

authorities nominating a short list of candidates to be guaranteed at least one nominee (providing they meet the relevant criteria) to represent their local community's interests.

Furthermore Council considers it appropriate that the membership of the Precinct Authority be constituted by the chairs of each of the Advisory Panels. This will seek to ensure that an integrated governance focus to the Authorities performance is achieved.

Role of Authority

Council appreciates that the authority requires a level of autonomy to efficiently operate. The business case is proposing that the authority will have a number of powers under multiple pieces of legislation including the *Development Act 1993*, *Local Government Act 1999*, *Urban Renewal Act 1995* and the *Planning, Development and Infrastructure Act 2016*. These powers include the ability to grant development consent, land division consent, the issuing of clearance under Section 51 of the *Development Act 1993* and the power to impose rates or charges under numerous acts with the power to require Council to collect the rate on behalf of the Precinct Authority.

In relation to powers which permit a Precinct Authority to impose and recover a rate, levy or charge, Council wishes to stress that rates can be a contentious issue and something which a Council always seeks to work in the community's best interest. The notion of an independent authority imposing separate charges could raise concerns within the community, this is something which requires serious consideration. Furthermore it is noted that separate rates are subject to review every 12 months and through this process can be answerable to challenges. In the instance that the rate is successfully challenged this may leave the Authority with inadequate resources to provide appropriate infrastructure. For this reason it is recommended that a series of Deeds with associated Land Management Agreements be pursued with the beneficiaries of the proposed development, detailing the financial contributions to be made for the provision of critical infrastructure prior to any rezoning occurring.

In addition it would be disappointing if landowners within the Concordia Growth Area who do not wish to develop their land or perhaps postpone the development of their land, be pressured or forced to sell their land to avoid paying a separate rate. This is something which the Town of Gawler sought to avoid through the application of a separate rate across the Gawler East Development Area, as it only comes into effect if and when a landowner chooses to develop their land. A similar approach should be considered by the Precinct Authority.

Preparation of Precinct Master Plan and Precinct Implementation Plan

The *Urban Renewal Act 1995* requires that the Precinct Authority must take reasonable steps to consult with each Council having a direct interest in the matter, as well as report to the Minister on matters raised throughout the consultation period. Council is not assured that this process will provide the opportunity for the Council to provide meaningful input into the master planning process.

This matter was also raised by the Barossa Council as a key issue, stating "it is essential that the full Council has the opportunity to be informed/veto through critical hold points in the process.

As stated above it is the desire of Council to see a truly integrated development transpire, which in fact seeks to strengthen the Town of Gawler rather than simply being tacked

on. Council has a significant knowledge base and understanding of our township and genuinely believe that our input will be beneficial to not only the authority but more importantly the eventual community that will Concordia home.

Council requests the opportunity to provide meaningful input throughout the development of the master plan and precinct implementation plan.

Council considers it appropriate that formal adoption of the master plan and precinct implementation plan should require Council endorsement prior to submission to the Minister for housing and Urban Development. This ought to be included into the Memorandum of Understanding which the Town of Gawler should also be a party to.

Design Review Panel (Legislated)

Pursuant to the *Urban Renewal Act 1995* a Design Review Panel must be established. The Business Case is proposing that the panel is to comprise three members plus a chair person. Within the draft terms of reference it states 'the Barossa Council may send an observer to Panel meetings'. It is disappointing and unsatisfactory that the Town of Gawler has not been considered in this instance. Furthermore Council is of the opinion that the proposed membership numbers be expanded to include a representative from the Town of Gawler, likely to be in the form of a senior member of staff with experience in large scale land divisions or possibly an independent representative. It is not envisaged that Council staff members would be paid for attendance and involvement at panel meetings unlike independent members.

Community Reference Panel (Legislated)

The Community Reference Panel is proposed to be the primary point of contact for public consultation for the duration of the preparation of the Precinct Master Plan. If the plan is required to be amended the panel is to be reconstituted with the option to maintain previous members or recruit new members. The stakeholder list is not considered to be totally comprehensive and a suggestion would be the inclusion of sporting and recreational clubs/groups. The development of the Precinct Master Plan is anticipated to be a relatively small part of the overall process. It is likely that the Community Reference Panel could have a much larger role to play throughout the life of this development particularly with regard to larger infrastructure projects. Ongoing consultation with the community is always considered to be beneficial as projects such as these are fluid and evolving. Additionally Council requests that the Town of Gawler is guaranteed at least one member sit on this panel. Council has significant experience in consulting with the local community and believes that we can be an asset to this panel.

Infrastructure Panel

It is encouraging to see that Council representatives from both the Town of Gawler and the Barossa Council are proposed to make up this five member panel. The business case does however state that "It is anticipated that each Council representative will attend as required i.e. as infrastructure has implications for that Council either short or long term." The business case goes on to state "A quorum will include at least one representative each from the relevant Council and the Authority". This essentially means that if infrastructure is not deemed to be of any significance to one of the Councils, they are not required to form a quorum.

This is potentially problematic from the Town of Gawler's perspective due to Council's desire to see the Concordia Growth Area formally become part of the Town of Gawler. Via this potential consolidation Council is aiming to help create a strong collective community to ensure a culturally, economically and environmentally sustainable future.

As a result and due to the fact that this land along with numerous assets which are yet to be constructed may eventually come under the care and control of the Town of Gawler or create an ensuing impact upon the existing infrastructure network, Council believes that it is appropriate for representatives from both Councils to be required in order to achieve a quorum. In addition Council wishes to stress the importance of the proposed chair being a true independent member.

Furthermore and as specified in the *Development Act 1993*, where land is to be vested in a council area, the council must consent to the vesting. Council would not want to see this requirement evaded through the establishment of a Precinct Authority and the powers afforded to the authority through the Urban Renewal Act.

Land Owners Reference Panel

It is noted in the draft terms of reference that the Barossa Council may send an observer to panel meetings. In light of the information discussed above pertinent to Council's boundary change proposal, the Town of Gawler should also be afforded the same opportunity to have an observer to Land Owners Reference Panel meetings.

Reporting Structure

The reporting structure proposed illustrates four panels feeding advice to the precinct Chief Executive who then is responsible for liaising with and informing the Precinct Authority. The Chief Executive also has the opportunity to seek direct advice from specialist consultants.

There doesn't appear to be any opportunity for the review/reference panels to report to the Precinct Authority nor does there appear to be any link between advice being sought from specialist consultants and this information being reviewed by the proposed panels. A peer review process can provide enormous benefit as it will aid in assessing the validity of such work and promote transparency. Transparency in this regard is considered crucial in promoting that the additional advice being sought is considered in an open and honest manner.

Below a modified reporting structure has been developed, it is different to the model proposed by CLM in two key ways, these being:

1. As well as liaising with the Chief Executive, each reference/review panel also reports directly to the Precinct Authority.
2. Any specialist advice contracted by the Precinct Chief Executive is to be considered and reviewed by the reference/review panels.

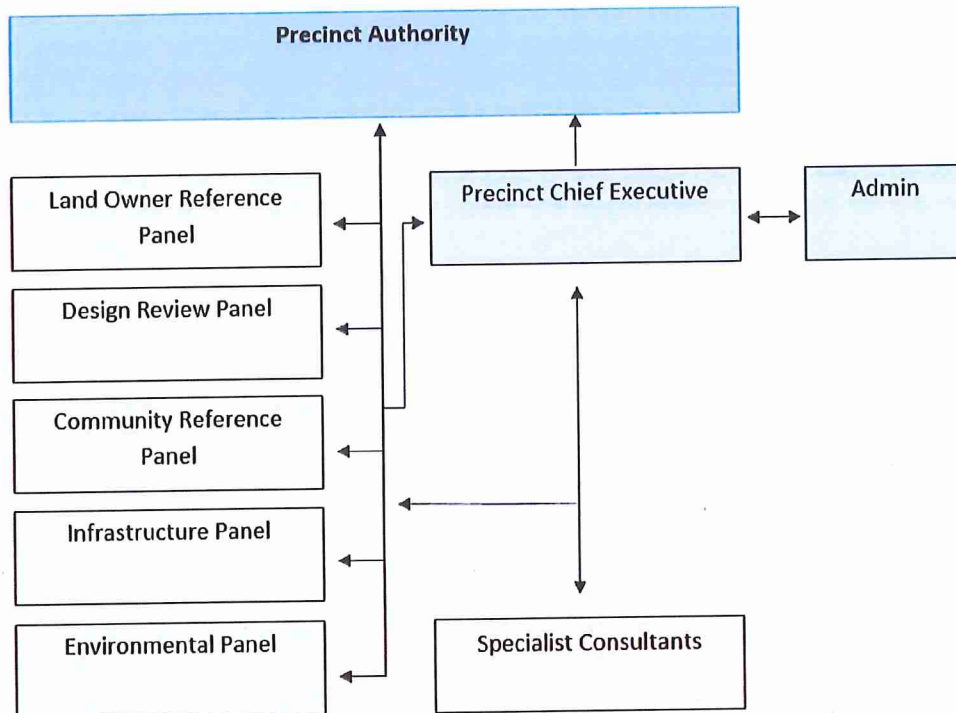


Figure 1: Suggested Reporting Structure

As illustrated in Figure 1 Council are of the opinion that the reporting structure proposed by CLM should be expanded to include an Environmental Panel. A development of this scale will create numerous environmental impacts throughout its lifetime and ongoing existence. An Environmental Panel will be able to assist in providing independent and professional advice on all environmental matters and guide the authority in making informed decisions.

Funding

The Business Case states that CLM may possibly provide the Precinct Authority with a loan to support the administration and for the preparation of a Master Plan as well as an Implementation Plan, with the costs to be recovered at a later date once development commences.

Council is opposed to the notion of CLM providing financial aid in the form of a loan to the Authority. For the proposed Precinct Authority to be perceived as totally independent and working in the best interest of the community, funding should be attained from an independent source with appropriate payback mechanisms established. The State Government may be a suitable financier if an appropriate payback scheme can be established.

Service Provision Arrangement

The Business Case is proposing to seek the approval of the Governor to facilitate the relevant Council setting and collecting a separate rate on behalf of the Authority. The Authority is proposed to manage the money raised for the provision and maintenance of

infrastructure as well as for the operation of the Precinct Authority. The Business Case also proposes that the administration costs to be carried by the relevant Council in collecting the rate will be later off-set by the Authority, in accordance with Section 7K(5)(c) of the *Urban Renewal Act 1995*.

Section 26 (Dividends) of the *Urban Renewal Act 1995* indicates that a statutory corporation (as proposed by CLM in their Draft Corporation Charter) may need to provide an annual dividend each financial year to the Minister. The Section further provides that if the Minister receives a dividend from the statutory corporation then the Minister may, in consultation with the Treasurer, either allocate that amount, or a part of the amount, in a manner determined by the Minister or pay that amount, or a part of that amount, for the credit of the Consolidated Account.

Council is of the view any such Dividend payment payable to the Minister should not be funded by the application of a Separate Rate, given that the funds generated from a Separate Rate can only be allocated towards the activity for which they are intended.

Ongoing Management

The Business Case proposes that once the development is completed, the authority will be dissolved and its role will be resumed by the relevant Council. This includes Council taking over ownership and maintenance of infrastructure and other functions. This is envisaged to occur in a staged manner and is a common approach to Greenfield development, in particular in instances where Councils have acted as the relevant authority and worked alongside developers throughout the development process.

In order for this approach to still function in this context, it is **critical** that Council is adequately represented on the proposed panels (as discussed above) and that the panel's recommendations are given appropriate consideration and weight by the Precinct Authority. As stated above, it is integral that any infrastructure to be built and subsequently vested into Council ownership at a future point is **consented to by that Council**. As taking on the care and control of assets, if not well designed and constructed or considered could impose a significant liability on a Council's financial sustainability in the future.

The Business Case also flags the possibility of the establishment of a separate rate for the ongoing maintenance of facilities across the growth area. It would be disappointing if the incoming community were to be imposed with a separate levy for ongoing maintenance.

Additional Commentary – Appendices & Tables

The timeframe afforded to Council to provide comment has not permitted a detailed analysis of the business cases' supporting appendices. Council's focus in this instance has been largely in relation to the proposed governance arrangements associated with the business case, however high level analyses has been undertaken and provided below for consideration.

Economic Analysis

The modelling conducted by PwC provides high-level economic benefits that will be directly attributable to the proposed Concordia project. The methodology and assumptions used to generate the benefits have been developed by the Centre of Policy

Studies at Victoria University. As stated within the CLM Business Case, this model does have wide use in Australia and has been peer reviewed thus providing greater credibility.

As with all types of analytics, the choice of methodology will influence the outcome so there would be models that would present lesser economic benefits but equally there would be models that would present greater economic benefits. Of note is that the figures being reported are quoted as 2017-18 dollars but need to be read as a total over the entire project life of 30 years. The model does not provide for movements in the value of the dollar therefore it does not account for potential changes to cost of living over this time period so the total benefits need to be understood to exclude such movements.

The study also assesses what it claims to be the broader economic impacts of Concordia. The estimation in this regard is reportedly based on analysis of Australian cities with a population in the vicinity of 50,000. What is not provided in the report is detail regarding which specific cities were used for this analysis. Economic activity can substantially vary State-to-State and Region-to-Region. Stating that output per capita for Gawler could be increased \$2.3 billion based on the data showing other, similar sized cities having 90% more output than Gawler currently has may be overstating the realistic improvement achievable in Gawler. Without knowing what cities the data comes from it is hard to assess whether they are comparable to Gawler. It is unclear whether these cities have the same industries as Gawler and/or whether they have similar regional constructs. The industry examples provided are aligned with Gawler's main industries being retail and health, however, as Gawler is a service centre for the wider region, comparisons to service industries would have been valuable.

The PwC report also states that the economic modelling has focused on results from South Australia as a whole. It has not drilled down to more localised regional impacts (i.e. Gawler and Barossa) which is disappointing as it would be beneficial to better understand the impacts at a local level.

The fact that the methodology and assumptions used to generate the benefits are reasonable and come from an authentic, peer reviewed model provides Council with some assurance of their validity. Whilst some of the assumptions would benefit from greater interrogation and more localised interpretation, Council administration do not see any obvious issues with the economic benefits supplied by PwC within the CLM Business Case.

Open Space, Recreation and Community Facility Provision

In terms of open space, the Business Case includes for provision of local, neighbourhood, ancillary and linear spaces (categorisation aligns with the Barossa, Light and Lower North Region Open Space, Recreation and Public Realm Strategy), however no district open space appear to be planned for. This assumes that there will be a reliance on access to existing (Gawler) district parks, with the Business Case stating "the western side of Concordia will have access to existing district parks" and indicating there will be no development of new district parks. In a development of this scale this would be unacceptable. There are no quantities incorporated in regard to open space opportunities and therefore Council is unable to provide feedback in this regard.

In regards to recreation and community facilities the following commentary is provided:

- Tennis is identified as being linked to a regional precinct in Gawler – given the current footprint there will be some challenges in regard to achieving this.

- There are two to four Soccer precincts currently proposed, this is very low given the population threshold and the upsurge in participation for this sport.
- There is a lack of non-traditional sport and recreational opportunities identified.
- Exploring the opportunity for the development of an indoor aquatic centre is highlighted – this could be an opportunity to work in collaboration with the Town of Gawler, this further highlights the benefits of appropriate representation from Councils on the proposed panels.
- Additional work in this space needs to ensure that consideration is given to existing recreation infrastructure in surrounding areas not be solely based on population thresholds.
- School provision is also based on population projections and needs to also take existing provisions into consideration.
- A regional hospital is being proposed however there is not detail in regards to whether this will be delivered publically or privately.
- There is a significant reliance on schools for the provision of community infrastructure. It would be beneficial to see any plan also incorporate stand-alone community infrastructure to aid in meeting the deficiencies which can be created by shared facilities.

Infrastructure Analysis - Infrastructure Charges

- Infrastructure Panel requested to be autonomous/independent to the Developer with Chair selected by the State Government.
- Infrastructure charges require further consideration. There are proposed costings for external infrastructure interventions, however there is no cost analysis provided to underpin the infrastructure quantum. Nominally \$16M allocated to Local Government but no information pertaining as to how this has been derived.
- Council request a methodology be provided to support the proposed infrastructure charges between State Government, Local Government and the Developer.
- Council request consideration be given to the methodology approach followed to develop the Gawler East Development Zone infrastructure charges, including population requirements and related traffic trip distribution.
- The infrastructure charges methodology used for Gawler East apportioned costs based on the extent Council would have contributed to the required intervention irrespective of the development. This essentially resulted in the Council funding improvements which would have been necessary for nominal population growth or asset management (i.e. base case cost scenario) where Council would have contributed to renewal irrespective of the development.
- The North East Connector road is unlikely to meet any of natural growth triggers (i.e. arterial road connections required solely for nominal growth) and trigger for its delivery would be based on the Concordia development.
- There is likely to be additional transport interventions required to facilitate orderly development of external infrastructure particularly relating to the North East Connector Road interfaces with roads under the care and control of Local Government and State Government.
- Some of the traffic interventions listed in the GTA Report, Table 8.1, are not consistent in the business case document provided and are planned for delivery as part of other draft Deeds in Gawler East (i.e. Intersection of Cheek Avenue and Calton Road) and not consistent with the Gawler Growth Area Transport Framework document (i.e. grade separation of north east connector over Sturt Highway as opposed to the proposed at-grade intersection by Concordia). Council request a review of all proposed infrastructure interventions is required in

the future which will likely include stormwater, walking and cycling, rail and road upgrades external to the Concordia site.

Transport Infrastructure - Roads & Traffic

- Information on the number of future dwellings to be consistent and confirmed.
- The trip generation rates assumed in future traffic modelling should be agreed with the Town of Gawler and the Barossa Council relative to assessment of impacts and traffic interventions and long term growth in the region. These rates underpin all the traffic infrastructure considerations and are crucial to be agreed upfront.
- Traffic modelling should also be consistent with previous traffic modelling trip generation rates undertaken by Tonkin Consulting as part of the Gawler East Link Road Project including trip generation for Cheek Avenue / Sunnydale Ave and other surrounding roads. It is noted 30% of trips are assumed to be internal to the site, which is considered conservative however consistent with the draft Gawler Traffic and Transport Management Plan. Of the 70% external trips proposed, it will be critical to determine the amount of traffic that will access Murray Street to mitigate impacts to the Gawler township, however this impact is not mentioned in the GTA Report. It is expected to be in the order of 20% of external traffic based on the draft Gawler Traffic and Transport Management Plan as a result of Concordia.
- The extension of the Gawler East Link Road through to Tiver Road is likely to be triggered from the Concordia Development. Reference should be made to Council's draft Traffic and Transport Management Plan. Additional traffic on the Gawler East Link Road from Concordia would trigger this extension to occur based on a major collector standard.
- Confirmation and update of the traffic modelling percentage trip distribution splits are required to confirm future external traffic interventions. The traffic analysis provided assumes percentage trip distribution splits that are not consistent with previous traffic modelling trip distribution splits underpinning the Gawler East Traffic Interventions.
- The Concordia road hierarchy should be aligned to direct traffic to Cheek Ave (preferred major collector) as opposed to Sunnydale Ave. It is noted Sunnydale Avenue is not proposed as a traffic intervention for upgrade in the Concordia documentation, however the main entrance to the site / shopping precinct is directly adjacent Sunnydale Ave. It should be noted the upgrade of Cheek Avenue between Lyndoch Road and Calton Road is planned to be undertaken as a traffic intervention for the Gawler East development zones.
- The upgrade of Sunnydale Avenue is not listed as an external traffic intervention in the Concordia documentation with no upgrade proposed. Confirmation is required on whether this road requires upgrade to collector standard as a result of Concordia traffic analysis.
- A Staging Plan should be provided which would then be aligned to the triggers for required infrastructure delivery. Council agree with the early delivery of the North Connector Road however prefer staging from the north to access the Sturt Highway as opposed to the south of the development site (i.e. Barossa Valley Highway). It is noted Concordia propose to commence stages from the south adjacent Barossa Valley Highway, which would have an immediate impact on external infrastructure and the GTA Report traffic analysis Figure 7.3 shows that the northern connection is not proposed until 50% development of Concordia. The impact of this additional traffic directed to Barossa Valley Highway should be considered further in the GTA traffic analysis.

- A peer review of the Concordia traffic analysis has not been undertaken to this point however should be undertaken by Council at the relevant juncture.
- The road reserve widths only (i.e. not road pavement widths) in the proposed cross-sections in the GTA report are generally consistent with Council's requirements for previous developments in the Town of Gawler, however these will require further consideration as part of more detailed traffic analysis for each road in the future.
- The North East Link Road should be considered as a State Government asset connecting two regional arterial roads (Sturt Hwy and Barossa Valley Way), will be a Freight Route, and will carry significant traffic volumes beyond a local road classification.
- It is noted some traffic Interventions are not included in the Concordia documentation provided, however should be considered as likely traffic interventions are:
 - o Sunnydale Ave upgrade
 - o Intersection upgrade of Barossa Valley Highway and the Northern Connector Road
 - o Intersection upgrade to Calton Road and new proposed connecting road
 - o Calton Road upgrades (if the proposed new road intersection is proposed to be delivered by Concordia).
 - o South / Eastern development traffic distribution not shown and interventions considered (i.e. Calton Rd upgrades).
 - o Council's preference to direct traffic to Barossa Valley Highway than Calton Road due to downgrading of Calton Road (east of Balmoral Road) as part of the Gawler East Link Road to a lower road classification.
- Council's preference would be to direct traffic to Barossa Valley Highway from the Concordia area south of Barossa Valley Highway so vehicles can utilise a future planned upgrade to a major collector standard of Cheek Avenue in the future rather than Calton Road.

Concordia Railway Station

- A rail station and bus routes are identified for future feasibility and if provided may change the traffic movements. This is a large unknown including how they are funded both in capital and ongoing operation.
- The grade separation of any future rail line with Murray Street will require further consideration and analysis, however in principle the separation to vehicles on Murray Street is preferred by Council for long term safe and convenient movement of rail services, vehicles and pedestrians.
- There are also expected to be impacts to existing car parking infrastructure in the Town of Gawler as a result of the Concordia development and there is already limited park and ride facilities in the Gawler Town Centre precinct. Additional park and ride facilities should be considered as part of any rail upgrades into Concordia.

Walking & Cycling

- The GTA Report provides a copy of the Gawler Growth Areas Transport Framework that shows walking and cycling infrastructure upgrades external to the Concordia site. Council consider the walking and cycling shared path connection through the ElectraNet easement between Calton Road and Lyndoch Road should be considered in the Concordia transport interventions for delivery to

facilitate connectivity of the development to existing surrounding suburbs and proposed new train station in Concordia. This walking and cycling intervention is currently not mentioned in the Concordia documentation.

- There are no proposed transport connections to the north and east of the development site to access the North East Connector Road. This should be reviewed for improved connectivity of the future community to access the Sturt Highway and Barossa Valley Highway.
- There are no proposed walking and cycling connections to the north, east and west sides of the development. The west side of the development should have pedestrian bridge connections over the North Para River to connect the community to the existing suburbs of Willaston / Hewett, connecting with the existing shared path network on the river corridor
- It is noted a shared path is proposed along the existing rail line. This is supported in principle for connectivity to surrounding suburbs and promotes intermodal transport opportunities to access the proposed new railway station and town precinct location.

Stormwater Infrastructure

- The principles of stormwater detention are supported to reduce the impact of increased runoff on downstream development, road infrastructure and river corridors.
- Detention would be required to limit post development flow to pre development flows for all storm events and this detail should be considered further as part of the planning and design of Concordia (including the height of Murray Road ford that should not be impacted by the development in terms of increased frequency of flooding).
- The draft Gawler and Surrounds Stormwater Management Plan should be referenced for the likely impervious area expected for the detailed modelling of stormwater detention basins and water quality infrastructure in the future.
- Most of the watercourses within the development have previously been classified in the draft Gawler and Surrounds Stormwater Management Plan as very low to low erosion potential (refer extract below, by Eco Management Services, undertaken as part of the Gawler and Surrounds SMP project). However, the lower reaches have been classified as moderate to high erosion risk, due to the steeper grades involved. These have the potential to erode, if not managed properly.
- There are significant erosion problems within the lower reaches of the watercourse that will serve the majority of the development. This is within the Town of Gawler area, and may become a maintenance burden, given the likely large increase in the frequency and volume of flows that will be generated by the catchment.
- External watercourse upgrades will be required to improve resilience to additional runoff generated by Concordia, including those in the Town of Gawler.
- Whilst not mentioned in the WGA report, consideration should be given to the co-location and integration of stormwater management and open space reserve areas in the planning and design of the Concordia development and the rationalisation of the number of detention basins and water quality treatment infrastructure.
- Council supports the proposed integration of recycled water into the stormwater management associated with the Concordia development.
- Existing watercourses should be protected and enhanced with revegetation and weed management to promote biodiversity.

- Council supports the future inclusion of water sensitive urban design into the planning and design of stormwater infrastructure and co-location opportunities with open space and streetscapes.
- The intent for offline detention infrastructure outside of existing watercourse environments is supported, noting the co-location with open space areas is promoted.
- Main watercourses are being retained within the development as green corridors that are likely to have instream treatments to manage water quality and erosion risks.
- Potential for significant sediment generation during construction that will need careful management during construction. Risk exacerbated by steep grades in some areas. This will end up in the Gawler River if not managed correctly requiring maintenance.
- More detailed investigations and modelling will be required to understand the full impact of the stormwater from the development on the North Para River, Gawler River and the Town of Gawler. The impact of climate change over the life of the development should be considered.

Public Lighting

- Council supports the proposed LED lighting as part of the Concordia development to promote sustainable energy use and public safety through CPTED principles.
- Public lighting should be considered as part of all future internal and external infrastructure interventions.

Environment

- Reference to the Town of Gawler Biodiversity Management Plan should also be considered as part of the planning and design of Concordia and it is likely a vegetation or biodiversity management plan will be required by Concordia in the future to ensure protection and enhancement of the existing environment and watercourses both internal and external to the development.
- Greater consideration of Climate Change should be made, specifically about how this proposed development can be designed to mitigate and adapt to the changing climate as well as the introduction of appropriate targets to minimise its carbon emissions.

The impact of Concordia upon Gawler will be significant and Residents will likely identify themselves as part of the Gawler community. Council is supportive of the development and wishes to see a well-planned and high quality development transpire to strengthen greater Gawler.

Through this response the Council have sought to stress the importance of the proposed process being fair, transparent and for the relevant Councils to be appropriately represented to ensure our feedback is given due consideration.

If you require any additional information concerning this letter, please contact Ryan Viney, Manager Development, Environment and Regulatory Services on 8522 9271 or via e-mail ryan.viney@gawler.sa.gov.au.

A handwritten signature in black ink, appearing to read 'K Redman', followed by a long horizontal flourish.

Yours faithfully

Karen Redman
Mayor

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