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15 August 2023

The Honourable Nick Champion MP
Minister for Planning
Attention Robert Kleeman
Manager Crown and Impact Assessment
Planning and Land Use Services
Department for Trade and Investment
GPO Box 1815
ADELAIDE SA 5001

By E-mail: Robert.Kleeman@sa.gov.au

Dear Hon Nick Champion MP

**Mount Lofty Golf Resort – Major Development Project -35 Golflinks Road Stirling
Council Submission on Development Report**

I refer to the Major Development proposal by Mount Lofty Golf Estate Pty Ltd to redevelop the existing golf course and buildings (the development) at 35 Golflinks Road Stirling, and the release of the Development Report for public comment.

The Adelaide Hills Council Assessment Panel considered the development proposal by Mount Lofty Golf Estate at the meeting held on 9 August 2023. The Panel acknowledge the staff report submitted and endorse the suggested further information and, report conditions in the event that planning consent is granted to the development (refer Attachment).

However the Panel also expressed significant concerns with elements of the proposal and the impact of the development on the community. The Adelaide Hills Council Assessment Panel resolved to lodge a separate submission to the Council in relation to the development as part of the public consultation process.

In particular Adelaide Hills Council Assessment Panel wishes to convey the following concerns in relation to the development:

1. The scale of the native vegetation clearance is unacceptable and intolerable. The scale of the SEB is an indication of how significant the level of clearance actually is. The payment of the Significant Environmental Benefit (SEB) levy does not adequately offset the native vegetation loss and its impacts in the locality. The extensive removal of the native vegetation will result in a negative environmental outcome with significant impacts on local biodiversity and diminished habitat for fauna in close proximity to the Mount George Conservation Park.
2. The design of the development does not have due regard for the advice of EBS Ecological Flora & Fauna Assessment Report (EBS Report) and the Arborman Tree Solutions Arboricultural Impact Assessment and Development Impact Report. In particular, the Development Report misinterprets the commentary in Section 7.5 of the EBS report. This appears to be a statement of existing conditions and therefore implies that development needs to consider these aspects to avoid an impact. The placement of the “pod” tourist accommodation in the centre of native

vegetation seems to unnecessarily facilitate the removal of native vegetation. Redesign to reduce vegetation clearance, reduce the number of “pod” tourist accommodation units, or removal of the “pod” tourist accommodation element altogether, would improve development outcomes and the ecological footprint of the development.

3. The existing conditions of Golflinks Road and the intersection of Golflinks and Old Carey Gully Roads present impacts for the safe movement of traffic (vehicular and cycle) and pedestrians in the locality should the development be approved with no upgrade of existing infrastructure. As stated by Council Engineering, Golflinks Road is not considered suitable as the location for the main traffic entrance given the increased number of vehicles, current sightlines and current road widths which are limited by topography and native vegetation. There is additional concern for the safety of road users in the event of fire evacuation. Prior to a decision on the development it is paramount that an Infrastructure Agreement for infrastructure upgrades is negotiated and entered into with the Council. As an Infrastructure Agreement is with the developer there is a further need for this to be secured by a Land Management Agreement registered over the land in the event the land is on-sold.
4. It has not been demonstrated what impacts there will be for the upgrade of the Council’s CWMS system and the existing pumping station on Golflinks Road. The infrastructure upgrade proposal shall be negotiated and agreed to by Adelaide Hills Council with all infrastructure upgrade costs borne by the applicant.
5. There is no formal assessment undertaken of the impacts to trees and native vegetation in the road reserve from the location of underground service provision and supporting infrastructure for the development. This is extremely important to avoid impacts upon the rare *Eucalyptus dalrympleana* – Candlebark trees that exist along the road verge.

The Adelaide Hills Council Assessment Panel does not support the development in its current form and urges the Applicant to have serious regard for the concerns expressed by the Panel prior to formulating the Response to Submissions.

If you wish to discuss this submission further please do not hesitate to contact me or the Assessment Manager, Deryn Atkinson on 8408 0522 or via e-mail at datkinson@ahc.sa.gov.au

Yours sincerely



Geoff Parsons
Presiding Member
Adelaide Hills Council Assessment Panel.

cc: Gabrielle.McMahon@sa.gov.au
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