

Mt Lofty Golf Estate Pty Ltd
20ADL-0075
8 June 2023

Development Report – Mount Lofty Golf Estate

35 Golflinks Road, Stirling

Development Report

8 June 2023

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We acknowledge the Kaurna People as the Traditional Custodians of the land on which we work and pay respect to their Elders past, present and emerging.

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Glossary and Abbreviations

BAL	Bushfire Attack Level
CT	Certificate of Title
CEMP	Construction Environmental Management Plan
CFS	Country Fire Service
CHMP	Cultural Heritage Management Plan
DP	Deposited Plan
DR	Development Report
EPA	Environmental Protection Authority
EFPA	Environment Food Production Area
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
FTE	Full Time Equivalent
GSP	Gross State Product
GRP	Gross Regional Product
HIS	Heritage Impact Statement
MGCP	Mount George Conservation Park
MLGE	Mount Lofty Golf Estate
TIA	Traffic Impact Assessment
The Code	The Planning and Design Code
The Guidelines	Guidelines for the Preparation of a Development Report, Mount Lofty Golf Estate
The Proponent	Mount Lofty Golf Estate Pty Ltd
The Minister	The Minister for Planning
PDI Act	Planning, Development and Infrastructure Act 2016
SA	South Australia
SAGR	South Australian Government Region
SPC	State Planning Commission
WMP	Waste Management Plan

Summary

On 17 December 2020, the Minister for Planning and Local Government (the Minister) declared the Mount Lofty Golf Estate (the proposed development) to be assessed as a Major Development pursuant to Section 46 of the *Development Act 1993* (the Act). Section 46 of the Act ensures that matters affecting the environment, the community or the economy to a significant extent, are fully examined and taken into account.

The State Planning Commission (SPC) is responsible for setting the level of assessment required (Environmental Impact Statement, Public Environmental Report or Development Report) and provides Guidelines. Impact assessment enables the holistic consideration of proposals that might otherwise be of a nature or scale that is not expected through the regular development assessment process and/or Planning and Design Code.

Due to the nature of the proposed development, the need for a broader assessment and investigation of the following was required:

- Tourist accommodation and associated land uses, including events,
- Bushfire protection requirements,
- Native vegetation clearance and tree removal,,
- The interface with the Mount George Conservation Park,
- The potential impacts on the Mount Lofty Ranges Watershed including water resources such as watercourses, dam, lakes, wetlands and floodplains, and associated water quality,
- The impacts on the surrounding traffic networks during construction and operation, and
- Servicing and infrastructure required for the site.

The proposed development is subject to the processes of a Development Report (DR). A DR was considered appropriate due to the nature and scale of the issues to be investigated. This DR covers both the construction and operation of the development and outlines a suite of management plans which will assist the operator in the on-going management of the facility. This DR is based on the 17 Guidelines prepared by the SPC (**Appendix A**). It provides a statement of the expected environmental, social and economic effects of the proposed development and the extent to which the expected effects of the development are consistent with relevant legislation.

Project Summary

Proponent and Owner:	Mount Lofty Golf Estate Pty Ltd (ACN: 625 359 837)
Property Location:	35 Golflinks Road, Stirling
Site Area:	39.9 hectares
Relevant Authority:	Minister for Planning
Council Area:	Adelaide Hills Council
Development Plan:	Adelaide Hills Council Development Plan
Zone and Policy Area:	Recreation Public Purpose and Policy Area 69 Public Purpose (Recreation & Sports)
Planning and Design Code Zone:	Recreation Zone
Current Land Uses:	Golf course and tourist accommodation
Description of Development:	Tourist accommodation and golf course and associated club facilities (ancillary bar, gymnasium and function rooms), together with landscaping, subdivision, tree and native vegetation removal

The Proposed Development

The proposed development is for tourist accommodation and golf course and associated club facilities (ancillary bar, gymnasium and function rooms), together with landscaping, subdivision, tree and native vegetation removal. The proposed development is summarised as follows:

- Construction of a 3-5 level tourist accommodation building comprising 56 units, 15 two bedroom serviced apartments, 15 three bedroom serviced apartments and 2 penthouse serviced apartments. Together with, back of house, plant storage and maintenance areas, function room, restaurant and external terrace, sports bar, gallery and cafe and wellness centre.
- 17 Private retreats – ‘Pods’ and 1 back of house service Pod.
- Adaptive reuse of the Local Heritage Perfumery building as a retail, cafe and multipurpose function space.
- Golf course facilities building - 2-5 level building comprising function facilities, cart storage and clubhouse, pro-shop, administration areas, gym and change rooms.
- Retention of the 18-hole golf course with improvements.
- Car Parking, access and waste management including a total of 200 car parking spaces in two car parking areas.
- Subdivision of the land (1 into 3) allotments to formalise the areas for tourist accommodation, golf course facilities building and balance of the site for leasing purposes.
- Stormwater detention basin, creek and lake restoration activities including planting natives in the beds, erosion control works and creek crossings.
- Construction of entry wall and new entry signage at the existing Golflinks Road entry.

A whole of site plan is provided overleaf which details the proposed development.

Response to the Guidelines

The following supporting information is appended to the DR, where the information directly responds to the guidelines, the relevant Guideline is also cited.

Table 1 - Technical Appendices in Response to the Guidelines

Appendix	Supporting Information	Guideline #
A	The Guidelines	-
B	Detail Survey - Alexander & Symonds	17
C	Plan of Subdivision - Alexander & Symonds	17
D	Architectural Drawings - RArchitecture	2, 14
E	Landscape Architecture Drawings and Species List - Oxigen	2, 3
F	Economic Analysis - Hudson Howells	1
G	Tree Impact Assessment - Arborman	9
H	Sustainability Strategy Report - DSquared	7
I	Traffic and Access Impact Statement - Cirqa	4, 8
J	Waste Management and Minimisation Plan - Cirqa	15
K	Geotechnical Investigations - FMG	-
L	Architectural Design Statement - RArchitecture	8, 16
M	Environmental Heritage Impact Assessment Report - EBS Ecology	9, 14
N	Cultural Heritage Management Plan - EBS Heritage	6
O	Ecological Flora and Fauna Assessment - EBS Ecology	6, 9, 10
P	Hazard Management Plan - Mount Lofty Golf Estate	8
Q	Bushfire Survival Plan - BSP Design	5
R	Environmental Noise Assessment Report - BESTEC	8
S	Services Infrastructure Summary - LUCID	-
T	Construction Environmental Management Plan - FMG	15, 16
U	Stormwater Management Plan - FMG	11, 12, 13, 16
V	BAL Assessment - BSP Design	5
W	Industry Letters of Support	1

Appendix	Supporting Information	Guideline #
X	Operational Environmental Management Plan - Environmental Projects	15
Y	Bushfire Management Strategy - BSP Design	5
Z	Native Vegetation Clearance Data Report - EBS Ecology	6, 9
AA	Architectural Renders - RArchitecture	2, 16
BB	Heritage Impact Statement - EBS Ecology	14
CC	Certificate of Title	-
DD	Integrated Water Management Plan - FMG	11, 12, 16
EE	Perfumery Landscape Plans - Oxigen	14
FF	Perfumery Detail Survey	14

Conclusion

Given its scale, the proposed development results in positive, neutral and negative impacts. On balance, the proposed development results in neutral to positive environmental, social and economic impact. In summary, the neutral impacts i.e. those which do not result in adverse amenity impact and/or can be managed through avoidance, mitigation and/or control, are:

- Vegetation and tree removal.
- Increased traffic movements to Golflinks Road.
- Increased demand for car parking.
- Increased vehicles using Old Carey Gully Road during construction.
- Increased number of people in High Risk Bushfire Area.
- Visual impacts from the Heysen Trail.

The positive impacts are:

- Improvement to landscape quality.
- Adaptive reuse of a local heritage item.
- Improvement to water quality treatment compared to pre-development.
- Better connectivity to Heysen Trail.
- Internal site upgrades to facilitate better accessibility for service vehicles and fire-fighting vehicles compared to pre-development.
- Increased local employment during construction in the Adelaide Hills
- Increased employment during construction and operation.
- Minimal visual impact from Golflinks Road.
- Retention and improvement to the golf club as an important community asset which has positive social impacts.
- Improved meeting facilities for social and community interaction which has positive social impacts.
- Promotion of golf in the area – a healthy pass-time which has social and economic benefits.
- Positive economic contribution to the Adelaide Hills economy during construction.
- Positive economic contribution to the States economy.
- Positive economic contribution to the Adelaide Hills economy.

The proposed development has demonstrable need in the Adelaide Hills. It is of high quality and design and on balance, the additional investigations sought by SPC have been addressed in this DR. The Minister for Planning can reasonably proceed this application to public exhibition.

1. Introduction

This report follows receipt of the Guidelines for the Major Project Application for a new tourist accommodation development at the Stirling Golf Club (the proposed development). It was declared a Major Project on the 17th December 2020.

The subject land (the land) is located at 35 Golflinks Road, Stirling. The site is an irregular shaped parcel with frontages to Old Carey Gully Road, Rangeview Drive and Golflinks Road. The site comprises a single allotment with a combined area of approximately 39.9 hectares. It is formally described as Allotment 53 in Deposited Plan 59212 contained in Certificate of Title Volume 5891 Folio 805.

It contains an 18-hole golf course and golf clubhouse, car park and a local heritage building.

The Proponent is Mount Lofty Golf Estate Pty Ltd (ACN: 625 359 837).

1.1 Background and Objectives

The Stirling Golf Club was founded by five members of the Royal Adelaide Golf Club in 1925 and was originally named Mount Lofty Golf Estate. The Proponent's vision is to return to the Stirling Golf Club to its original name; the Mt Lofty Golf Estate. The year 2025 marks its 100th year in operation. Completion of the proposed development is sought to align with the club's centenary celebrations.

The project objectives are:

- Minimise impact to existing site topography,
- Preserve and enhance native flora and fauna,
- Preserve and enhance the original publicly accessible golf course,
- Respect Traditional Owners,
- Reflect the history and character of the Adelaide Hills,
- Optimise views,
- Prioritise to sustainable practices by improving the current natural resources at the property to create a unique hospitality experience,
- Showcase local produce,
- Preserve and enhance local amenity, and
- Grow regional tourism and make a positive economic contribution.

1.2 Staging and Timing

The expected date for commencement of construction is end of 2024. The construction program is estimated to take 24 to 30 months. The expected date for operation is 2026. The three stages of construction are:

Stage 1:

- Upgrade access and road from old Carey Gully Road

- Provide new parking for adjacent to perfumery.
- Demolition of existing golf club and accommodation.

Stage 2:

- Site preparation
- Construction of pods and tourist accommodation / new buildings
- Existing access to be used for construction only
- Holes 1 and 2 to be used for construction hubs / parking etc.

Stage 3:

- Construct new function pavilion and refurbish perfumery.
- Upgrade / refurbish golf course.

1.3 The Development Report Process

The State Planning Commission (SPC) is responsible for setting the level of assessment required for this Development Report (DR) through provision of the Guidelines. A DR was considered appropriate due to the nature and scale of the issues to be investigated. This DR is prepared in response to the Guidelines (**Appendix A**).

Pre-lodgement engagement was undertaken with the following agencies:

- Department of Environment and Water (DEW).
- Native Vegetation Council (NVC).
- Country Fire Service (CFS).
- Adelaide Hills Council.
- SA Water.
- Environment Protection Authority (EPA).
- Hill & Fleurieu Landscape Board

The *Development Act 1993* requires that a DR be publicly exhibited for a period of at least 15 business days and for a public meeting to be held during this period.

The Proponent has undertaken targeted engagement with the nearby residents on Golflinks Road through a letterbox drop and door knocking. The Proponent's representative URPS, met with Stirling Golf Club executive members (General Manager, President and Captain) and socialised the proposed development and an engagement process with members and neighbours. This engagement was voluntary and intended to supplement statutory public notification due to commence in mid 2023.

This DR covers both the construction and ongoing operation of the development. A suite of management plans and strategies are also provided in **section 5** of this DR and **Appendices J, N, P, Q, T, U, X and Y** which plan for the operation and on-going management of the Mount Lofty Golf Estate.

2. Need for the Proposed Development

2.1 Proponent Objectives

The Proponent saw a need for the proposed development to achieve the following objectives:

- Create a high amenity 18-hole golf course which attracts local and interstate visitors,
- Provide an attractive location for local and interstate function and conference visitors,
- Respond to local tourism industry demand by providing tourist accommodation with unique value-adds,
- Retain and attract new golf club members,
- Provide high-end tourist accommodation in a unique Adelaide Hills setting,
- Attract local residents and tourists to showcase local produce and promote local history in refurbishment of the Local Heritage, Scent Factory (Perfumery Building).

2.2 A Need for Tourist Accommodation and Unique Tourism Industry Value-Adds

The Proponent engaged with the South Australian Tourism Commission (SATC) to determine if there was a need for the proposed development. The review confirmed that the proposed development would directly respond to three of the six priority areas listed in the *South Australian Visitor Economy Sector Plan 2030* (SATC, 2019) (the Sector Plan) and that there was a need for tourist accommodation in this location. The three relevant priorities of the Sector Plan were:

- Experience & Supply Development
- Industry Capability, and
- Leisure & Business Events.

The Sector Plan noted that “experience development” also includes the ongoing improvements to South Australia’s accommodation supply. South Australia falls behind our competitor states in quality accommodation options and being able to cater to larger groups to accommodate ‘leisure and business’ events. This is a particular challenge in our regions where travellers are increasingly expecting accommodation to include a strong experiential component. The Sector Plan demonstrated that it was essential that accommodation operators deliver superior service and unique value-adds.

The Adelaide Hills region has relatively few large-scale facilities and the proposed development directly addresses this observed shortfall. A key action of the Sector Plan was to upgrade and refresh the quality of accommodation across South Australia to match consumer expectations and create immersive experiential accommodation options.

The Sector Plan set a bold ambition to grow the visitor economy to \$12.8 billion by 2030 and generate an additional 16,000 jobs. The Economic Analysis of the Mount Lofty Golf Estate prepared by BDO EconSearch and Hudson Howells at **Appendix F** summarises the positive contribution that the proposed development will have on the local Adelaide Hills South Australian Government Region (SAGR) economy and for South Australia. The contribution of the proposed development to South Australia’s Tourist Economy is even more prevalent as the State promotes itself post Covid-19.

2.3 Strong Local Industry Support

The proposed development also has strong local industry support as demonstrated in the letters of support provided at **Appendix W** from:

- South Australian Tourism Commission,
- The Stirling Golf Club Members,
- A PGA Golf Professional and Representative of the South Australian Chapter of the PGA, and
- Adelaide Hills Tourism.

These provide support for the potential contribution that the proposed development can have on local golf tourism and visitor accommodation, both for the Adelaide Hills and the State. The need for the proposed development is demonstrably strong from a local industry perspective.

2.4 Environmental, Economic and Social Impacts of the Proposed Development

Given its scale, the proposed development results in positive, neutral and negative impacts. The positive and neutral impacts of the proposed development outweigh the potential negative impacts, and with considered on-going management and mitigation the negative impacts are reduced.

Table 2 provides a summary of the anticipated environmental, economic and social impacts of the proposed development. Each item is briefly explained with additional commentary provided in the following sections of this DR. This DR covers both the construction and ongoing operation. A suite of management plans and strategies are provided in **section 5** and **Appendices J, N, P, Q, T, U, X** and **Y**, which manage the potential negative impacts and provide procedures to avoid and mitigate.

Table 2 - Summary of Impacts

Impact	Environmental / Economic / Social	Positive (+) Negative (-) Neutral (N)	Explanation
Improvement to landscape quality	Environmental	+	Improved habitat for fauna, improved visual quality of site.
Adaptive reuse of a local heritage item	Environmental, Economic, Social	+	The adaptive reuse of the Perfumery will help to preserve and protect it, and the inclusion of a scent garden and orchard will establish a continued connection to its previous use as a local perfumery. Reusing the building will have long term benefits for the community as if the building cannot be incorporated into the golf course redevelopment, it will continue to deteriorate.

Impact	Environmental / Economic / Social	Positive (+) Negative (-) Neutral (N)	Explanation
			The proposed work will not have an adverse impact on the current heritage values of the building but will rather enhance the heritage values (HIS, page 5).
Improvement to water quality	Environmental	+	Improved 'flow on effects' through creek and waterway restoration. Existing lakes improved with planting to embankments and stormwater basin for water quality improvement. Designated crossovers for walkers and golf buggies to reduce potential for golfers to traverse and damage waterways.
Connectivity to Heysen Trail	Environmental	+	Inclusion of a lookout deck connects Heysen Trail and provides views to the golf course and celebrates the architecture of the facility.
Vegetation removal	Environmental	N	A large proportion of the land is subject to a significant environmental benefit (SEB) to offset impacts to biodiversity arising from the development. Payment of \$439,095.19 which includes a \$22,891.21 administration fee into the NV fund is proposed to offset native vegetation removal.
Increased traffic movements to Golflinks Road	Environmental	N	Additional vehicle movements on Golflinks Road are proposed. The Traffic Impact Assessment at Appendix I , finds that "while it is acknowledged that there will be an increase in movements on the adjacent road network as a result of the proposal, it is considered that the traffic impacts will be within acceptable levels and not result in significant impact on other road users in the vicinity of the site".

Impact	Environmental / Economic / Social	Positive (+) Negative (-) Neutral (N)	Explanation
Increased demand for car parking given intensification of land uses.	Environmental	N	Car parking is provided in accordance with likely demand.
Increased vehicles using Old Carey Gully Road during construction.	Environmental	N	Large construction vehicles are diverted away from Golflinks Road to minimise impacts to these residents.
Positive internal site upgrades to facilitate better accessibility for service vehicles and fire-fighting vehicles.	Environmental	N	Internal roads and manoeuvring areas have been designed to accommodate the largest vehicle to frequent the site. Internal roads have been designed to accommodate fire fighting vehicles.
Increased number of people in High Risk Bushfire Area	Environmental	N	The proponent commissioned a bushfire management plan and bushfire survival plan to safeguard patrons in the event of a bushfire.
Increased local employment during construction in the Adelaide Hills	Social, Economic	+	The proposed development will support the employment of 141 Full Time Equivalent (FTE) jobs in the Adelaide Hills SAGR on average over the three years of construction (Appendix F).
Increased employment during construction	Social, Economic	+	The proposed development will support the employment of 240 FTE jobs in the state on average, over the three years of construction. These estimates include the construction of the development and flow-on effects in the broader economy (Appendix F).
Increased employment during operation	Social, Economic	+	Statewide, the development is expected to contribute GSP of \$40.3m, household income of \$16.7m, and support the employment of 261 FTE jobs annually in the South Australian economy by the tenth year of operation. This includes the operation of the estate, associated tourism expenditure at other businesses,

Impact	Environmental / Economic / Social	Positive (+) Negative (-) Neutral (N)	Explanation
			and flow-on effects in the broader economy (Appendix F).
Positive economic contribution to the Adelaide Hills economy during construction	Economic	+	During the construction phase, the development is expected to contribute Gross Regional Product (GRP) of \$41.1m and household income of \$29.3m to the Adelaide Hills economy.
Positive economic contribution to the States economy	Economic	+	Statewide, the development is expected to contribute Gross State Product (GSP) of \$87.1m and household income of \$57.3m to the South Australian economy (Appendix F).
Positive economic contribution to the Adelaide Hills economy	Economic	+	By the tenth year of operation, the development is expected to contribute GRP of \$32.0m, household income of \$12.6m, and support the employment of 225 FTE jobs annually in the Adelaide Hills economy. This includes the operation of the estate, associated tourism expenditure at other businesses, and flow-on effects in the broader economy (Appendix F).
Medium visual impact	Environmental, Social	N	As detailed in the Architectural Design Statement (Appendix L), the visual impacts associated with the proposed development are medium. This level of visual impact is considered appropriate given the scale and context of the proposed development.
Visual impacts from the Heysen Trail	Environmental, Social	N	Particular care was taken to preserve views to Mt George and to position the built form to reduce the impact on views from the Heysen Trail. The choice of materials reflects the desire to blend the building with its surroundings. It is not uncommon that man-made structures are visible from the Heysen Trail, such as the South Eastern Freeway.

Impact	Environmental / Economic / Social	Positive (+) Negative (-) Neutral (N)	Explanation
Retention of the golf club as an important community asset	Social	+	The Stirling Golf Club is an important community asset for recreation and social interaction.
Improved meeting facilities for great social and community interaction	Social	+	The proposed development provides on-going opportunities to meet and congregate at the Golf Club which has a history of hosting local events in the Adelaide Hills in its clubrooms.
Promotion of golf in the area – a healthy pastime	Social, Economic	+	The flow on effects to the economy from having healthy and active people is positive. Further, the social benefits of exercise and recreation promotes healthy living and social interaction especially in an aging demographic.

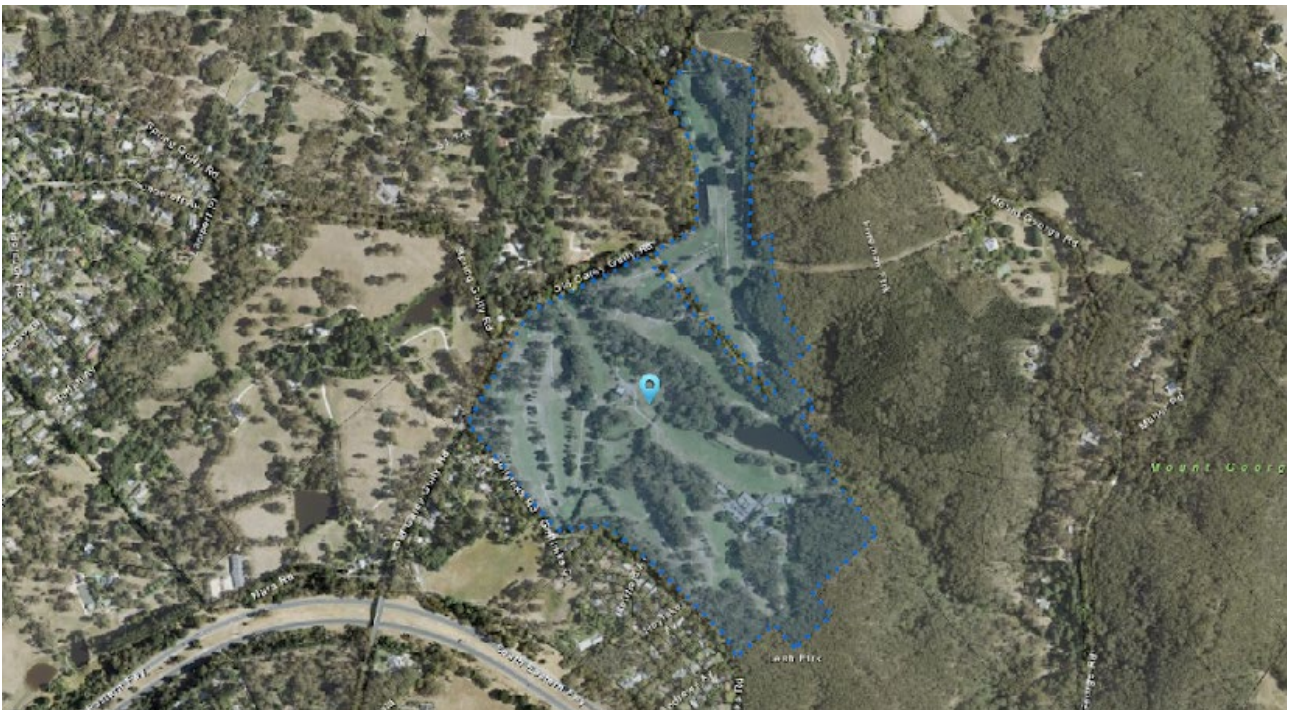
3. Description of the Proposed Development

3.1 The Subject Land

The subject land (the land) is located at 35 Golflinks Road, Stirling, approximately 2.5 kilometres north-east of Stirling post office and approximately 250 metres north of the South Eastern Freeway.

The site is an irregular shaped parcel with frontages to Old Carey Gully Road, Rangeview Drive and Golflinks Road. The site comprises a single allotment with a combined area of approximately 39.9 hectares. It is formally described as Allotment 53 in Deposited Plan 59212 contained in Certificate of Title Volume 5891 Folio 805 (**Appendix CC**). A detail survey of the site is provided at **Appendix B**.

Image 1 - The Land



It includes an 18-hole golf course with associated members facilities, gymnasium, bars and function rooms supported by a commercial kitchen (**Image 2**). The Golf Course and Club Rooms are leased by the Stirling Golf Club. The facility also includes 5 motel-style accommodation rooms (**Image 3**). The Stirling Golf Club hosts functions and weddings (for up to 300 guests) as well as regular events.

The land contains a local heritage place described as a cottage, which was a former Scent Factory (referred to herein as the Perfumery) (**Image 4**).

The land uses occurring on the site are summarised as:

- Tourist accommodation.
- Golf course and associated club facilities (ancillary bar, gymnasium and function rooms).

Image 2 – Existing Clubhouse Buildings



Image 3 – Accommodation Units



Image 4 – The Perfumery



Vehicle access is provided via a primary access point on Golflinks Road (near the southern portion of the site), at which all turning movements are permitted. The site contains an easement for Davenport Road, which is an unsealed track that runs from Carey Gully Road along the Heysen Trail through the site. Maintenance access points are also provided on Carey Gully Road.

The primary parking areas are located to the east and south of the main buildings. A total of 65 parking spaces are provided in these areas. Additional informal parking is also available within the site.

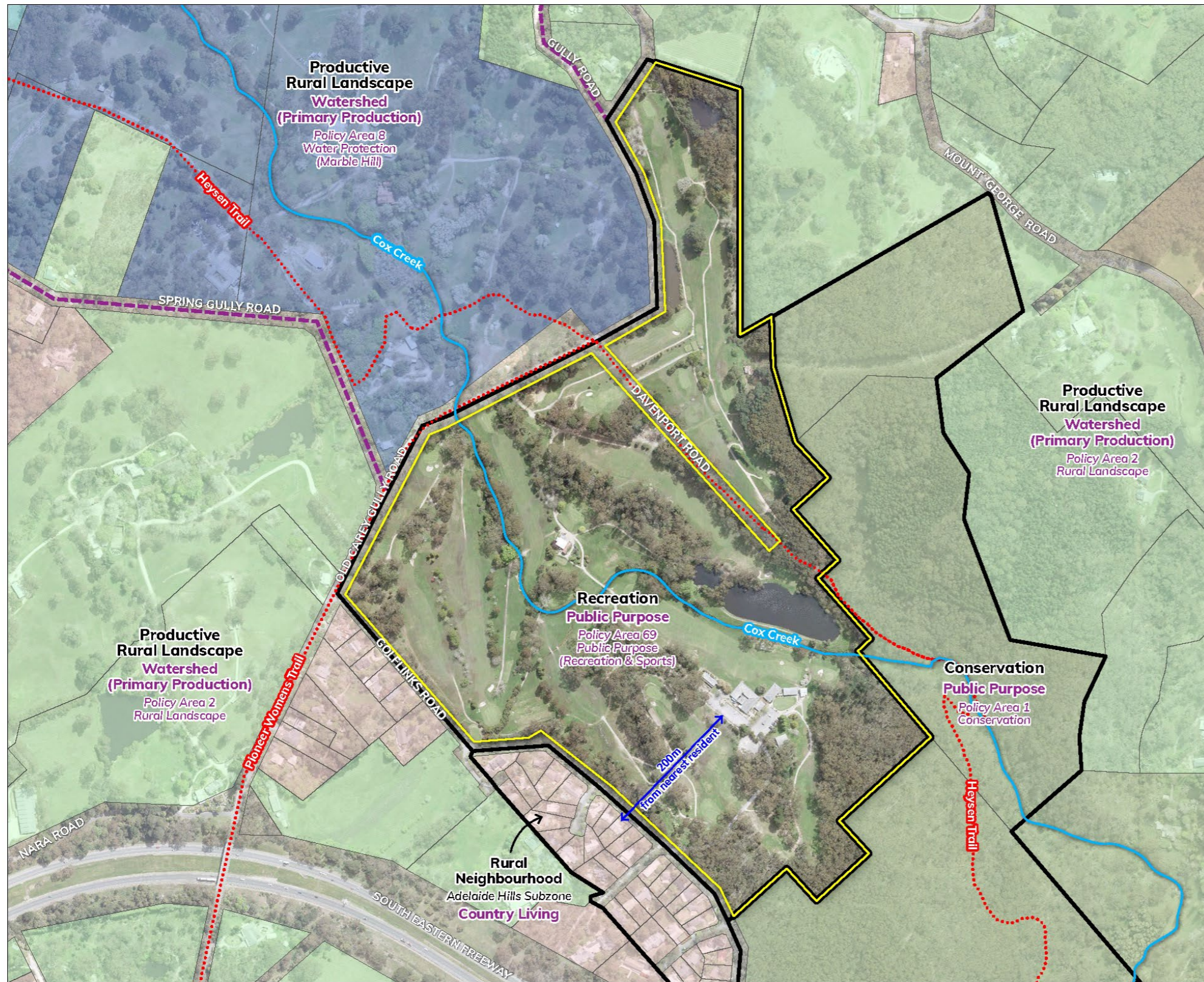
3.2 The Locality

The site is bound by residential properties to the north, Mount George Conservation Park to the east, Golflinks Road to the south and Old Carey Gully Road to the west.

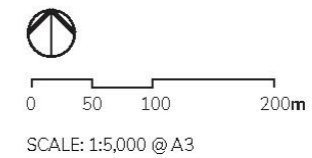
The locality is defined by the presence of Mount George Conservation Park and bisected by Cox Creek. The site is immediately east of the Scouts SA Woodhouse complex. Existing residents live adjacent to the site on Golflinks Road.

The Heysen Trail runs through north-eastern portion of the site between Hole 14 and Hole 16 of the Golf Course.

The Locality is depicted on the Locality Plan overleaf.



- Legend**
- Subject Site
 - Zone Boundary
 - Rec** Planning & Design Code Zone
 - PP** Development Act Zoning / Policy
 - Walking Trail
 - Creek
 - Cadastre
- Land Use**
- Agriculture
 - Horticulture
 - Public Institution
 - Reserve
 - Residential
 - Rural Residential



LOCALITY
Mount Lofty
Golf Course

JOB REF.	20ADL-0075
PREPARED BY.	MP
DATE	05.12.22
REVISION.	1
DATA SOURCE	MetroMap (10.10.22) data.sa.gov.au



1395-002

3.3 Site Selection and Suitability

Three potential locations were investigated as part of the initial site investigations which informed the site's location. Site selection was based on the following criteria:

- topography,
- distance to Mount George Conservation Park,
- availability and proximity to services,
- minimising visual impacts to residents on Golflinks Road,
- minimising impacts to the function of the 18-hole Golf Course,
- minimising the need for removal of trees and vegetation - through application of advice sought from the Native Vegetation Council (NVC),
- minimising cut and fill,
- minimising impacts to people and property in the event of a bushfire - through application of advice sought from the Country Fire Service (CFS).

Image 5 details the three locations investigated to find a suitable site and **Table 3** provides a matrix which measures the suitability of each site location against the site selection criteria. The matrix ranks each of the sites against the criteria to measure suitability. For each criteria the three sites are ranked, 1, 2, or 3 - 3 being the most desirable site, 1 being the least desirable site. The highest cumulative number is the most suitable site.

Image 5 - Site Options

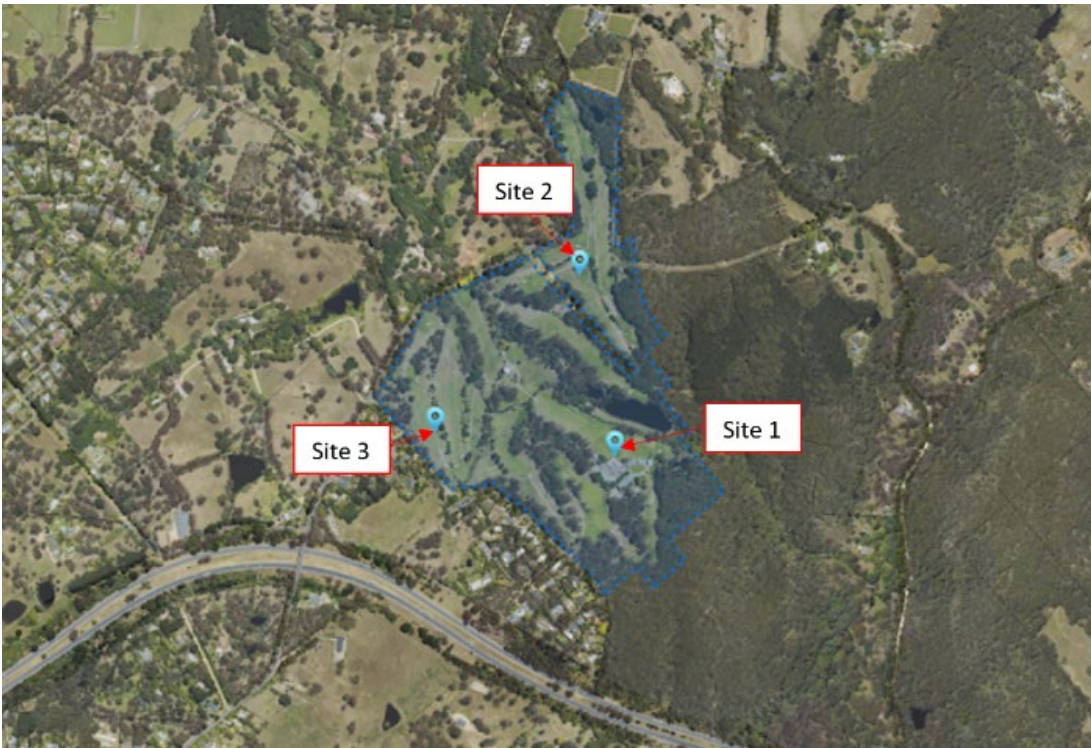


Table 3 - Site Selection and Suitability Matrix

Criteria	Site 1	Site 2	Site 3
Topography	3	1	2
Distance to Mount George Conservation Park	2	3	1
Availability and proximity to services	3	1	2
Minimising visual impacts to nearby residents	3	2	1
Minimising impacts to the function of the 18-hole Golf Course	3	1	2
Minimising the need for removal of trees and vegetation - through application of advice sought from the Native Vegetation Council (NVC)	1	2	3
Minimising cut and fill	3	1	2
Minimising impacts to people and property in the event of a bushfire - through application of advice sought from the Country Fire Service (CFS)	1	3	2
TOTAL	19	14	15

Based on the site selection criteria, Site 1 was found to be the most suitable site for the location of the proposed development. Site 1 performed the best given:

- It utilises the existing 'pad' where the clubrooms are located, which minimises the need for vegetation removal, minimises cut and fill and takes into account the sites unique topography.
- It can connect to existing services (with upgrades).
- Minimises the potential for impacts to views from external vantage points by locating the buildings centrally within the site and at a low point of the site. Added benefit also exists in locating buildings where the general public is already used to seeing buildings in the landscape.
- Minimises impacts to the function of the golf course through utilising the area presently occupied by the existing golf club buildings.
- Is located away from hazardous vegetation in Mount George Conservation Park, which reduces the potential impacts in the event of a bushfire.

Site 1 did not perform as well as the other two sites in terms of tree and vegetation removal and bushfire risk. To reduce the level of clearance, the proposed development was amended. Initially, 20 private Pods were proposed and this has now been reduced to 17 Pods. Utilising the existing footprint of the club rooms assisted in overcoming the site's constraints in terms of vegetation and topography. As detailed in **section 5** of this DR and **Appendix Q, Y and V**, bushfire risk has been mitigated through the proposed clearance of vegetation in the understorey adjacent the Pods. As well as siting the development away from the Mt George Conservation Park. The Bushfire Management Strategy and Bushfire Survival Plan provides guidance on both planning for bushfire events and the processes to be implemented in the event of a bushfire. Likewise, payment of \$439,095.19 which includes a \$22,891.21 administration fee into the NV fund was proposed in **Appendix Z** to offset the loss of native vegetation arising from the proposed development. Taking into account the proposed mitigation, Site 1 was chosen as the most suitable location for the development.

3.4 Nature of the Proposed Development

The nature of the proposed development is refurbishment of an existing golf course together with construction of a 2-5 level building to accommodate tourist accommodation and associated golf club facilities and ancillary shop and function facilities together with cut and fill, landscaping, subdivision, tree and native vegetation removal. More specifically, it includes the following:

- Construction of an integrated 2-5 level tourist accommodation and golf facilities building comprising:
 - tourist accommodation (3-5 levels):
 - 56 tourist accommodation units.
 - 15 x two bedroom serviced apartments.
 - 15 x three bedroom serviced apartments.
 - 2 penthouse serviced apartments.
 - Back of house, plant storage and maintenance areas.
 - A 537m² function room.
 - A 212m² restaurant with 89 m² external terrace.
 - 186m² sports bar.
 - A 189m² gallery and cafe.
 - A 94m² wellness centre with 125m² gym and spa/massage treatment rooms. The wellness centre is not open to the general public.
 - Golf Course Facilities (2-5 levels):
 - Retention of 18-hole golf course with improvements.
 - Refurbished function facilities, cart storage and 138m² clubhouse in new building.
 - New 97m² pro-shop, administration areas, gym and change rooms.
- Construction of Private retreats – 'Pods'
 - 17 x one bedroom units.
 - 1 x back of house Service Pod.
- Adaptive reuse of the existing Perfumery:

- Refurbishment of the existing local heritage place to accommodate a multipurpose space for use as café, retail or functions.
- Extension to the Perfumery to include a covered outdoor dining area.
- Orchard and perfumery garden plantings to reimagine the former use of the building as a “Scent Factory”.
- Car Parking, Access and Waste Management
 - A total of 200 car parking spaces in two car parking areas.
 - Emergency vehicle access via western entry from Golflinks Road.
 - Main access point via Golflinks Road.
 - Designated service bay for waste collection and service vehicles.
 - Porte cochere and valet area for guests and buses.
 - A separate entry from Old Carey Gully Road to provide maintenance vehicle access and public access to the perfumery building.
 - Designated waste storage areas.
- Cut and fill of the land (indicative estimated volumes):
 - Cut: -15,838m³
 - Fill: +3,008m³
 - Net = 12,829m³
- Subdivision – following construction of the proposed development, it is proposed to divide the site into three (3) allotments:
 - Allotment 532, with an approximate area of 9,924m² together with a right of way ‘A’, comprising the tourist accommodation building and pods.
 - Allotment 533, with an approximate area of 5,056m² together with a right of way ‘B’, comprising the golf club and facilities building.
 - Allotment 531, with an approximate area of 38.4 hectares, comprising the balance of the golf course, subject to easements ‘A’ and ‘B’.
- New entry statement signage at the Golflinks Road entry to the site.

3.5 Site Layout Plans

The proposed development is depicted on the following drawings:

- Architectural Drawings – RArchitecture - **Appendix D**
- Landscape Architecture Drawings – Oxigen - **Appendix E**
- Architectural Renders - RArchitecture - **Appendix AA**
- Plan of Subdivision - Alexander & Symonds - **Appendix C**

An extract if each of the above is provided in the following sections, for additional detail refer to each of the relevant Appendices.

Image 6 - Pods, Tourist Accommodation and Facilities Building Layout



Image 7 - Landscape Site Layout



Image 8 - Architectural Renders - Arrival view (Mt George in background)



Image 9 - Architectural Renders - the Pods as viewed from the 18th hole fairway



Image 10 - Architectural Renders - view from 3rd hole of Golf Course (Mt George in background)

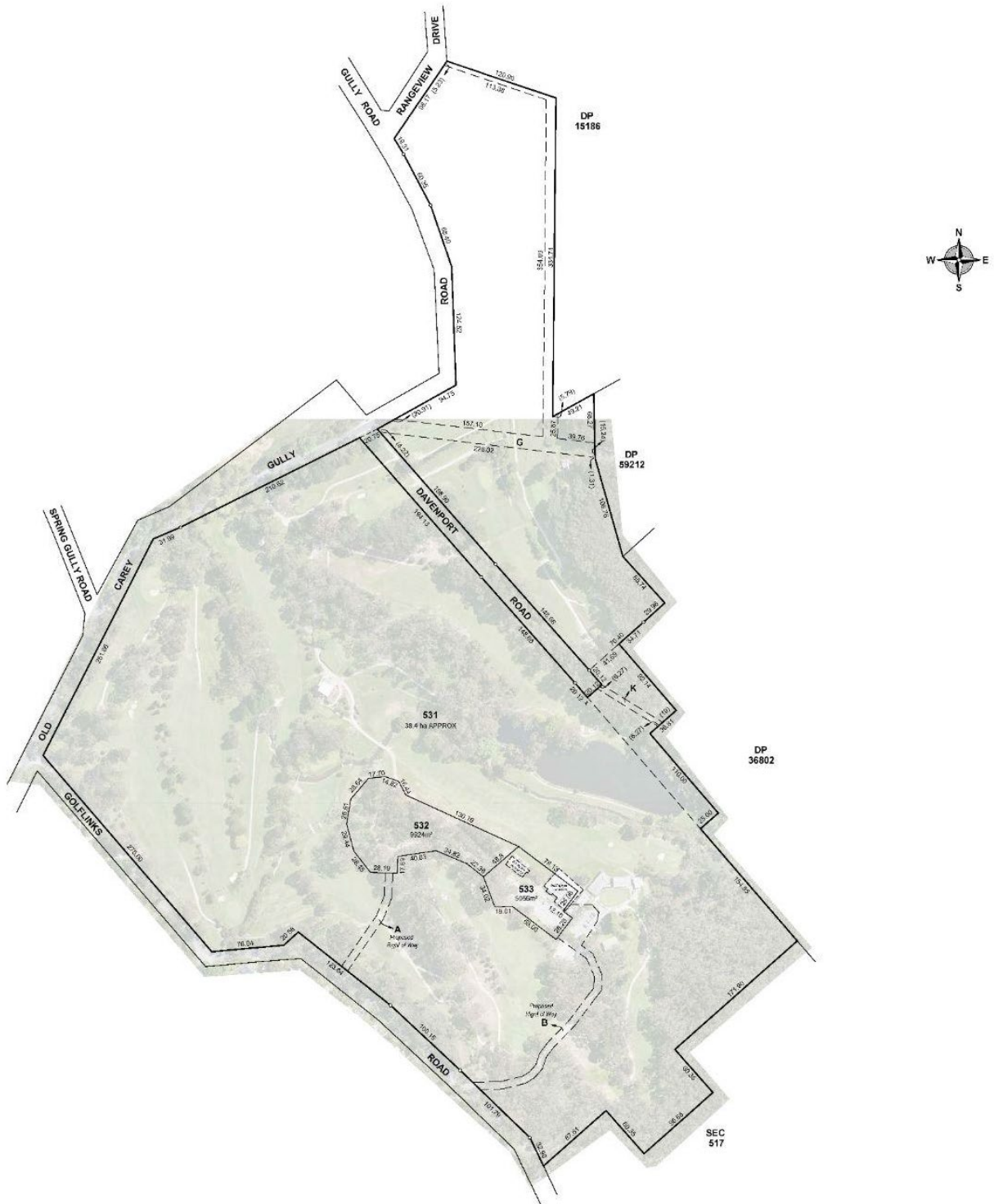


Image 11 - Architectural Renders - View towards proposed development from 18th hole fairway, Perfumery building shown right of image.

Second Image below provides imagery of the Adaptive Reuse of the Perfumery



Image 12 - Extract of Indicative Subdivision Plan



3.6 Sensitive Receivers

The guidelines sought that the nearest sensitive receivers and their distances from various site activities be mapped and provided. A sensitive receiver is defined as:

“A sensitive receptor/receiver is a fixed location such as a house, building, other premises or open area where health, property or amenity are affected by emissions that increase the concentration of the emitted parameter above background levels. Sensitive environments, plants and animals may also be considered as sensitive receptors because vegetation and animals can also be affected by emissions”, (EPA, 2016, Evaluation distances for effective air quality and noise management)

The nearest sensitive receivers are located on Golflinks Road to the east of Muirfield Avenue. These are mapped in the BESTEC Environmental Noise Assessment Report (**Appendix R**). The Locality Plan provided in an earlier section of this DR also details that the nearest sensitive receivers are in excess of 200 metres from the proposed built form.

3.7 Construction and Commissioning Timeframes (Including Staging)

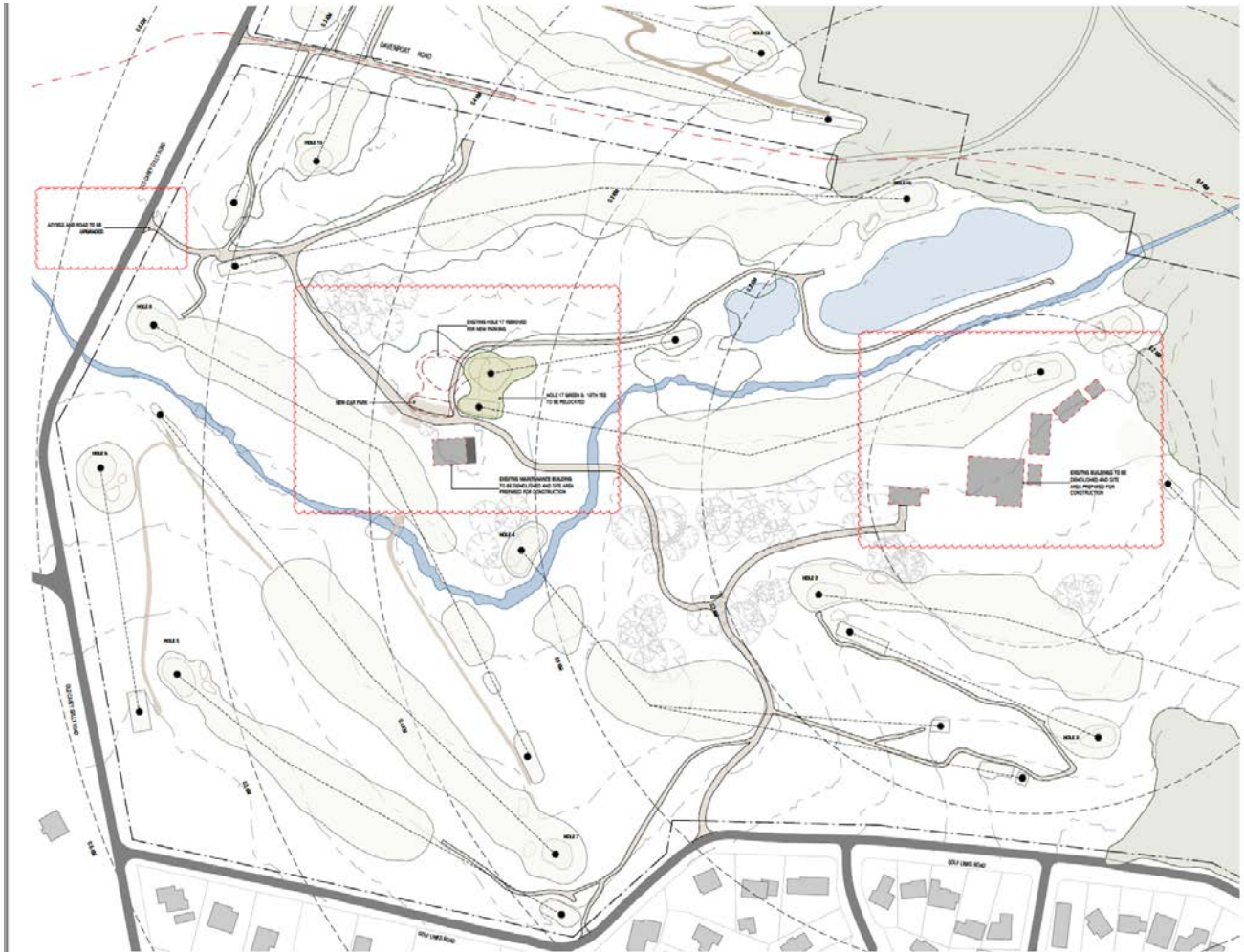
The expected date for commencement of construction is the end of 2024. The construction program is estimated to take 24 to 30 months. The expected date for operation is 2026.

The proposed development is to be constructed across three stages:

Stage 1:

- Upgrade access and road from old Carey Gully Road
- Provide new parking for adjacent to perfumery
- Demolition of existing golf club and accommodation.

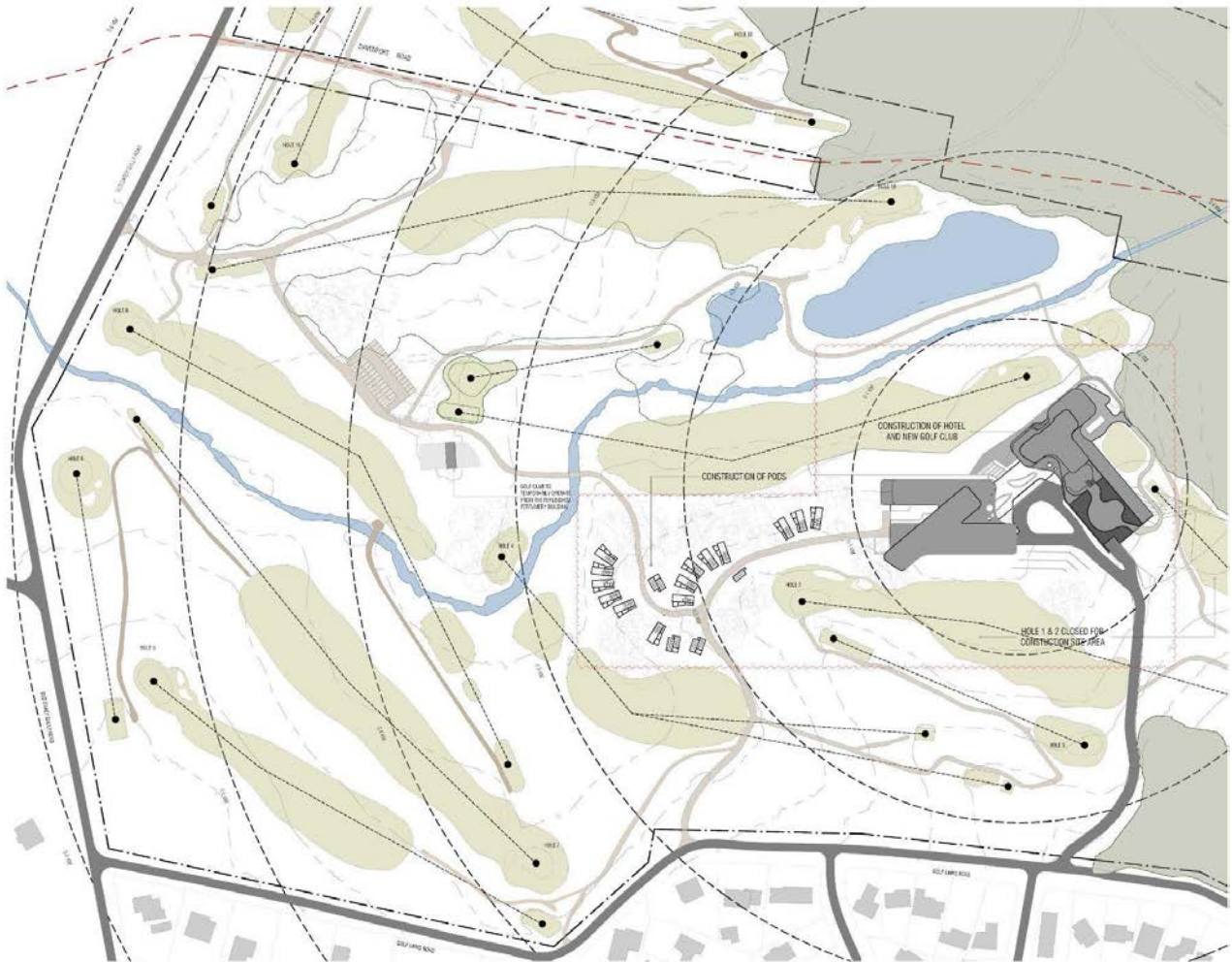
Image 13 - Stage 1



Stage 2:

- Site preparation
- Construction of pods and tourist accommodation / new buildings
- Existing access to be used for construction only
- Holes 1 and 2 to be used for construction hubs / parking etc.

Image 14 - Stage 2



Stage 3:

- Construct new function pavilion and refurbish perfumery.
- Upgrade / refurbish golf course.

Image 15 - Stage 3



A contingency plan for delays in construction is detailed in the Construction Environmental Management Plan (**Appendix T**).

4. Environmental, Social and Economic Assessment

This section provides an assessment of the anticipated environmental, social and economic impacts of the Proposed Development. In reading this section, reference should be had to:

- **Table 1 - Technical Appendices in Response to the Guidelines** in the Summary of this DR as it provides a direct response to each Guideline and references the supporting technical appendices; and
- **Table 2 - Summary of Impacts** - which provides a cumulative summary of the impacts of the proposed development. It also references the assessment hierarchy and colour coding established by the Guidelines which determines the importance and required level of assessment of each potential impact, as follows:

Assessment Level	Explanation of Assessment Level	Guideline Reference
Critical	Where information about the issue is lacking and the response is unclear, the issue is classed as 'critical'.	1-5
Medium	Where work is required to address the issue but the risk is likely to be manageable with additional information then the risk assessment is classed as 'medium'.	6-14
Standard	Where the issue is well known and the response is well understood then the risk assessment is classed as 'standard'	15-17

The above system has been applied in addressing each of the impacts. For each, a summary of the impact is provided with reference to the relevant technical appendix and a comment on the level of impact provided.

4.1 Tourism, Economic Development and Job Creation

Critical

An Economic Analysis of the Mount Lofty Golf Estate prepared by BDO EconSearch and Hudson Howells is provided at **Appendix F**. It summarises the positive contribution that the proposed development will have on the local Adelaide Hills South Australian Government Region (SAGR) economy and for South Australia.

During the construction phase, the development is expected to contribute Gross Regional Product (GRP) of \$41.1m and household income of \$29.3m to the Adelaide Hills economy. Additionally, the proposed development will support the employment of 141 Full Time Equivalent (FTE) jobs in the Adelaide Hills SAGR on average over the three years of construction.

Statewide, the development is expected to contribute Gross State Product (GSP) of \$87.1m and household income of \$57.3m to the South Australian economy. Additionally, the proposed development will support the employment of 240 FTE jobs in the state on average, over the three years of construction. These estimates include the construction of the development and flow-on effects in the broader economy.

By the tenth year of operation, the development is expected to contribute GRP of \$32.0m, household income of \$12.6m, and support the employment of 225 FTE jobs annually in the Adelaide Hills economy. This includes the operation of the estate, associated tourism expenditure at other businesses, and flow-on effects in the broader economy.

Statewide, the development is expected to contribute GSP of \$40.3m, household income of \$16.7m, and support the employment of 261 FTE jobs annually in the South Australian economy by the tenth year of operation. This includes the operation of the estate, associated tourism expenditure at other businesses, and flow-on effects in the broader economy.

The impacts on the local and state economy arising from this project are vast. It will result in a **positive** economic impact.

4.2 Design / Visual Amenity

Critical

The Architectural Design Statement (**Appendix L**) prepared by RArchitecture provides a summary of:

- the design philosophy,
- the evolution of proposed development (including options explored and discounted) from the initial concept to the final design with reference to the Design Review Panel process which the Proponent undertook,
- site access,
- servicing strategy, including emergency access,
- building site selection,
- built form and visual impact,
- materiality,
- landscaping, including proposed development's response to the unique landscape setting and any work in the public realm,
- Environmentally Sustainable Design,
- universal/equitable access,
- adaptive reuse of the Local Heritage Place – the Perfumery.

Reference to the Architectural Design Statement (**Appendix L**) should be had to understand how the design has evolved with regard to the above. The Proponent participated in the State Government led Design Review Panel process which facilitated positive design outcomes.

A visual impact analysis is provided which considers near and distant views. The visual impact analysis finds that the cumulative visual impact of the proposed development is 'medium'. A degree of visual impact is anticipated in a development of this scale. The architectural response sought to minimise visual impacts through:

- choice of materials, the use of timber cladding, curved precast concrete and slate cladding respond to the sites natural surroundings,
- breaking up the building form into two parts to provide visual relief and provide a landscaped backdrop,
- designing with the site's topography to minimise views of the building form from external vantage points.

The approach to avoid and minimise visual impacts through design results in a medium visual impact. This is considered an appropriate level of impact because the siting, design and architecture responds to the scenic, natural and topographic character of the area. The proposed visual impacts are considered **neutral**.

4.3 Landscaping

Critical

The proposed landscape design sought to minimise the impacts of the built form through distinct landscape typologies. These relate to the new tourist accommodation and facilities buildings and nearby areas and the Perfumery Scent Garden.

No additional landscaping is proposed adjacent to the Pods as the understorey and smaller trees are proposed to be removed due to Bushfire hazard. On-going management of the area adjacent to the Pods is to be kept to managed grassland.

Particular care was also taken to preserve views to Mt George and to position the built form to reduce the impact on views from the Heysen Trail. The choice of materials reflects the desire to blend the building with its surroundings. The following extracts from the landscape design strategy detail approach to planting, site design and materiality.

FLEXIBLE OUTDOOR SEATING SPACES



LAWN TERRACES



ROOFTOP GREENING



MOUNDED FEATURE PLANTERS



UPPER LEVEL DECKS + BALCONIES



MEADOW PLANTING

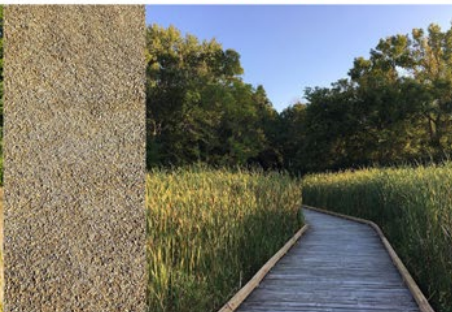


ORNAMENTAL TREES

P2 - SMALL BOARDWALK

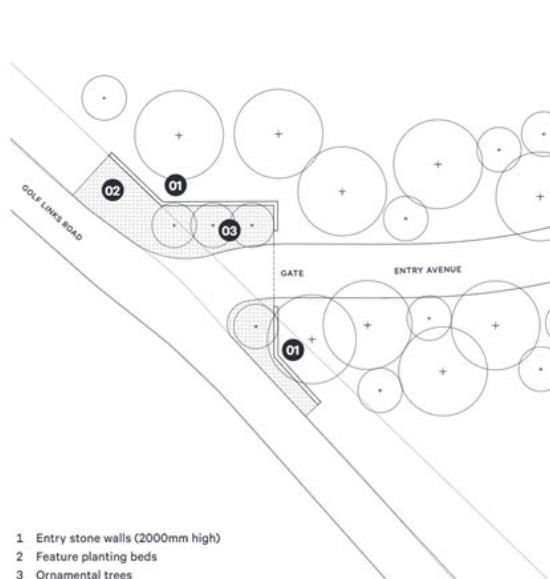


P1 - COMPACTED GRANULITIC PAVING



LOW LEVEL NATIVE GRASSES

Source: Oxigen, 2022



- 1 Entry stone walls (2000mm high)
- 2 Feature planting beds
- 3 Ornamental trees

STONE ENTRY WALL



SIGNAGE AND ACCESS GATE



TREE LINED AVENUE



RE-INSTATED UNDERSTOREY PLANTING

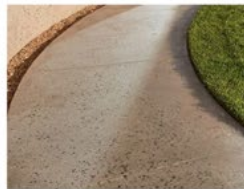
Material and elements play an important role in providing amenity and contributing to visual consistency throughout the key sites.

- Paving and hardscape elements are of enduring quality enable safe movement, are robust and low maintenance.
- Public outdoor spaces are integrated through consistent materials and detailing.
- Locally sourced materials are used where possible.
- Materials are selected for their durability and whole of life costing.



P1 + P2 Stone / Precast pavers

- High quality unit pavers
- Stepping stones (Pods)



P3 - Concrete

- Honed and gritblast non-slip insitu concrete paving
- Used for paths, plazas and thresholds



Hotmix Roads

- Sealed entry roads and carparks
- Kerbless / Flush Kerbs



Corten Steel

- Feature edging



W1 - Gabion Wall - Local Stone

- Large walls where long spans are required.



Compacted Sand / Gravel Paving

- Local compacted sand
- High quality unit pavers
- Used for pedestrianised areas (Pods)



Local Stone

- Feature paving, walls, edging, steps, terraces



Timber

- Class 1 seasoned hardwood or thermally modified timber
- Natural grey finish
- Used for decks, trims and fences

Source: Oxygen, 2022

Integration of the landscape design and architecture, aids in minimising the impact of the proposed development. It does this through softening the appearance of the built form and integrating it with its landscape context. The design achieves this through:

- Lawned terraces.
- Balcony planting.
- Balustrade planting.
- Rooftop 'green roof' sedum gardens.
- Entry and roadside planting.

A site-wide approach to restoring creeks and waterways assists in improving the site's overall ecology and appearance. Integration with the Heysen Trail also sought to showcase the proposed development. The following is proposed:

- Restoration to creek beds with revegetation along creek beds, with designated crossovers for walkers and golf buggies.
- Existing lakes improved with planting to embankments and a small lookout deck integrated along the connection to the Heysen Trail.
- Stormwater basin for water quality improvement.

The proposed stormwater detention basin, creek and lake restoration activities including planting natives in the beds, erosion control works and creek crossings are water affecting activities that require a permit under the Landscapes South Australia Act 2019 obtained from the Hills & Fleurieu Landscape Board. It is anticipated that these activities will have a **positive** environmental outcome that comply with the Hills & Fleurieu Water Affecting Activity Control Policy and Western Mt Lofty Ranges Water Allocation Plan.

4.4 Traffic and Access

Critical

The proposed development results in an increase to the total number of vehicle movements and an increase in car parking demand. Site access and car parking areas have been designed to accommodate all anticipated vehicle types (including fire fighting vehicles) and car parking is provided in accordance with demand. Assessment of both construction and operation traffic has been undertaken. A comprehensive Traffic and Access Impact Statement has been prepared by Cirqa, the key findings of which have been summarised below and an assessment made against the relevant Code provisions.

Operational Phase

Vehicle access to the site will be provided via the existing crossover on Golflinks Road. The internal driveway facilitates access to the various parking areas present on the site and the pick up/drop off area in front of the estate. The entrance has been designed to facilitate the ingress/egress of vehicles in a forward direction. The existing access on Old Carey Gully Road will be improved to facilitate vehicle access to the 'perfumery' building (previously a service vehicle entrance). Additional upgrades to Golflinks Road were recommended by the traffic consultant including, improvements to the shoulder bends to assist with the increase in vehicle movements and load. This would provide some mitigation to residents within the locality.

Performance Outcome 5.1 of the General Development Policies (Transport, Access and Parking) of the Code seeks:

- PO 5.1** **Sufficient on-site vehicle parking and specifically marked accessible car parking places are provided to meet the needs of the development or land use having regard to factors that may support a reduced on-site rate such as:**
- (a) availability of on-street car parking**
 - (b) shared use of other parking areas**
 - (c) in relation to a mixed-use development, where the hours of operation of commercial activities complement the residential use of the site, the provision of vehicle parking may be shared.**
 - (d) the adaptive reuse of a State or Local Heritage Place.**

Via an analysis of the land use, it was determined that the following spaces are required for each period:

- 187 parking spaces during the weekday evening peak.
- 196 spaces during the Saturday lunch period.
- 189 parking spaces during the weekend morning period.

The following car parking arrangement is proposed:

- 200 parking spaces provided with four spaces reserved for people with disabilities.
- Additional three spaces provided within the pick up/drop off area which can also accommodate buses.
- Provision for additional car parking adjacent to the 'perfumery' building.

The proposed number of car parking spaces will accommodate the anticipated demand generated by the development (Cirqa, 2022).

All deliveries, services vehicles and refuse collection will occur via a dedicated service bay (with adequate turn path space) within the eastern tourist accommodation building (refer pg. 8, Cirqa, 2022). This area accommodates a vehicle length of 10.4 metres, facilitating a range of service vehicles.

The pick up/drop off area will facilitate the vehicle movements for large buses and CFS vehicles up to a length of 12.5 metres (refer pg. 9, Cirqa, 2022).

Additional vehicle movements on Golflinks Road are proposed. The Traffic Impact Assessment at **Appendix I**, finds that *"while it is acknowledged that there will be an increase in movements on the adjacent road network as a result of the proposal, it is considered that the traffic impacts will be within acceptable levels and not result in significant impact on other road users in the vicinity of the site"* (Cirqa, 2022).

The traffic, car parking and access impacts associated with the operation of the development have been considered and they result in a **neutral** impact because:

- car parking can be accommodated on site,
- the largest vehicle to frequent the site can be accommodated,
- fire fighting vehicles can be accommodated; and
- whilst there is an increase in vehicle movements to the site, this will occur at a level appropriate to the classification of the external road network and should not cause unreasonable levels of impact.

Construction Phase

It is anticipated that during the construction phase, 20 to 30 staff/trades will be on site each day. This will result in up to 30 to 60 light vehicle movements per day and will be absorbed by the movement systems. Vehicle types associated with the construction of the infrastructure (e.g demolition, earthmoving and material delivery) are anticipated to be undertaken by vehicles with a length of up to 19 metres. These vehicles will be able to enter and exit the site via the Old Carey Gully Road access to mitigate amenity impacts on the sensitive receivers along Golflinks Road. Additional measures of mitigation regarding vehicles during the construction phase is provided at **Appendix T**.

In summary of the traffic, car parking and access arrangements for the proposed development during construction and operation, the following is noted:

- Car parking is provided in accordance with likely demand, (**neutral impact**).
- Internal roads and manoeuvring areas have been designed to accommodate the largest vehicle to frequent the site (**neutral impact**).
- Construction vehicles are diverted away from Golflinks Road to minimise impacts to these residents, (**neutral impact**).
- The increased vehicle movements on the adjacent road network are considered to be “within acceptable levels and not result in significant impact on other road users in the vicinity of the site” (Cirqa, 2022) (**neutral impact**).

4.5 Bushfire

Critical

The proposed development is located in a High Bushfire Risk Area under the Code and is in close proximity to hazardous vegetation including the Mount George Conservation Park. Under the Adelaide Hills Development Plan, the land was also High Bushfire Risk.

Ongoing engagement with the CFS informed the capacity and location of on-site fire water storage, the location of the Pods and the proposed removal of under-storey vegetation. The removal of vegetation was also subject to review by the Native Vegetation Council (NVC) and engagement with NVC was also undertaken to balance the requirements of both agencies.

In the initial concept design, the Pods were located adjacent to the Mt George Conservation Park. Early advice sought from the CFS suggested that this location was not suitable from a bushfire risk perspective. The Proponent took this advice and relocated the Pods. Further, the number of Pods was reduced from 20 to 17.

To reduce impact to the Pods in the event of a bushfire event. All understorey and smaller trees are proposed to be removed, together with 13 trees. The understorey will be managed grassland.

With regard to the tourist accommodation and golf club facilities building, an agreed setback distance of 35 metres and a suitable Bushfire Attack Level (BAL) of 19 was negotiated with the CFS. The setback to Mount George Conservation Park is also proposed to be managed grassland.

A BAL Assessment provided at **Appendix V** provides a technical assessment with regard to bushfire. A Bushfire Survival Plan (**Appendix Q**) and a Bushfire Management Strategy (**Appendix Y**) provide ongoing management of the proposed development with regard to bushfire.

With the design recommendations, the proposed development results in **neutral** environmental impact with regard to bushfire. The increase of patrons in a high bushfire area increases the risk of a **negative** social and economic impact arising from the proposed development. The proposed management strategies outlined in the Bushfire Survival Plan and Bushfire Management Strategy reduce this risk to an acceptable level.

4.6 Conservation

Medium

The Conservation values of the Mount George Conservation Park (MGCP) are not anticipated to be impacted by the proposed development in terms of Aboriginal culture or flora and fauna. Two assessments were undertaken taking into account the requirements of the EPBC Act, These are:

- Cultural Heritage Management Plan (CHMP) (**Appendix N**).
- Ecological Fauna and Flora Assessment was undertaken by EBS Ecology (**Appendix O**).

A Cultural heritage Management Plan (CHMP) to address the impacts of the development on the cultural heritage of First Nations People. The CHMP Framework document sets out in detail how risk will be managed and the controls that will be implemented to ensure that no damage is caused to Aboriginal heritage during the construction and operational phases of the development. The CHMP will assist in conserving Aboriginal culture throughout the project's lifetime.

An Ecological Fauna and Flora Assessment was undertaken by EBS Ecology (**Appendix O**). The Assessment identified that pockets of remnant native vegetation, scattered trees and planted landscaped areas exist on the land. The Mount George Conservation Park (MGCP) is located directly adjacent to the subject land which supports a large assembly of nationally and state significant flora and fauna. No significant habitat loss or displacement was identified in the assessment. The Assessment found "vegetation that remains in the Project Area [post development] is of high habitat value as it provides a corridor for movement to better quality vegetation. Additionally, the remaining remnant scattered trees contain a significant number of hollows, likely to be utilised by less conspicuous or nocturnal species and utilised for nesting, either by birds or other fauna. With reference to the EPBC Act, nationally and state significant flora and fauna will continue to be conserved post-development.

4.7 Environmental Sustainability

Medium

A Sustainability Strategy Report prepared by DSquared is provided at **Appendix H**. It provides Sustainability Strategies and Ecologically Sustainable Design (ESD) initiatives for the proposed development to reduce its impact on the environment in both construction and operation.

The proposed development is targeting a 5-star rating certification from the Green Building Council of Australia. In doing so, a high degree of validity can be prescribed to the above ESD initiatives, ensuring their implementation.

A suite of ESD initiatives have been integrated into the design - these are captured in the following extract from the Sustainability Strategy:



These initiatives align with the Proponent’s objective to:

“prioritise to sustainable practices by improving the current natural resources at the property to create a unique hospitality experience”.

The following passive design principles and climate-responsive techniques are integrated into the design:

- Buildings oriented toward the north which captures free heating from the winter sun with external shade elements and balconies used to provide shade protection from the summer sun, reducing the reliance on active climate control techniques.
- Facade shading elements and glazing specifications have been selected by energy performance modelling and computer simulation techniques.
- A tailored approach has been taken regarding facade glazing. Solar heat gain coefficients have been optimised for each building type to ensure a balance between summer and winter temperature regulating.
- Air leakage pressure testing will be conducted on the external facade to ensure ideal air leakage rates, significantly reducing air conditioning energy consumption.

- Installation of a green roof, facade planters and extensive landscaping will provide a passive cooling effect from water transpiration and act as a barrier.
- Completely electrified energy system with no fossil fuels or natural gas required.
- Installation of 300 solar voltaic panels on the rooftop at 330W per panel, providing 20% of the total energy requirement of the building.

Additional sustainable practices will be incorporated in the hiring of local labour and materials as well as selecting recycled materials and highly efficient water and electrical fittings.

The confluence of these actions and practices will reduce the energy consumption of proposed development by 24% (and the carbon emissions from energy use by 18%) when compared to a reference study from the National Construction Code.

The proposed development results in **positive** environmental impacts with regard to sustainability in the built form. The integrated approach to incorporating these features into the design demonstrates how the Proponent intends to prioritise sustainable practices.

4.8 Land Use

Medium

The land is located in the:

- Public Purpose Zone and the Public Purpose (Recreation and Sports) Policy Area in the Adelaide Hills Development Plan (the Development Plan).
- Recreation Zone under the Code. No Sub-Zones apply to the land.

The Guidelines sought: “*The Development Act 1993 requires the DR to state the consistency of the expected effects of the proposed development: with the relevant Planning and Design Code policy....*”. The Development Act 1993 (and the Development Plan) was in force when the project was declared a Major Project. Since this time, the *Planning, Development and Infrastructure Act, 2016* (and the Code) has been enacted. A complexity exists in the application of legislation in this regard. The weight to be applied given this policy landscape is at the discretion of the Minister of Planning as the Major Development assessment process provides the most rigorous form of impact assessment which is highly interrogated.

Under the Development Plan, the tourist accommodation portion of the development would have been considered a non-complying form of development. A Non-complying form of development underwent a heightened level of assessment. Under the Code, the proposed development would be Performance Assessed and all proposed land uses are envisaged.

The provisions of the Code have been given greater weight in this assessment. Desired Outcome (DO) 1 and PO 1.1 of the Zone seek:

DO 1: Provision of a range of accessible recreational facilities

PO 1.1: Development is associated with or ancillary to the primary purpose of structured, unstructured, active and / or passive recreational facilities.

PO 1.6: Facilities that may attract longer-term stays may include complementary activities associated with the principal recreational use of land, such as tourist accommodation.

(underlining emphasis added)

The proposed development provides structured active recreation facilities, in the golf course and provides complementary tourist accommodation. It is consistent with land use provisions of the Zone.

The primary use of the land is for a 'golf course' which is envisaged in DPF 1.1 of the Zone. DPF 1.1 also lists the following acceptable land uses:

(n) shop ancillary to recreation facility

(v) tourist accommodation ancillary to recreation facility.

Golf courses and recreation facilities are not explicitly defined under the Code however the land has existing use rights as a golf course with ancillary accommodation and ancillary pro-shop, function and restaurant (shop) facilities. The continued use of the land for such purposes is consistent with DO 1, PO 1.1 and PO 1.6, as it principally remains a golf course with ancillary tourist accommodation offering.

The existing land uses will be intensified as part of the proposed development. To determine whether the level of intensification is appropriate, a cumulative impact assessment which takes into account the amenity of neighbouring properties was undertaken. Regard was had to visual, noise, traffic and lighting impacts. A summary of this assessment is provided below:

Visual - As detailed in the visual analysis provided in the Architectural Design Statement (**Appendix L**), the proposed development results in medium visual impact. This is based on an analysis of near and distant views, both internal and external to the site. The visual impact to adjacent land users arising from intensification of the existing land uses results in a **medium visual impact**. The visual impacts associated with the development have minimal impact on adjacent neighbours, with the majority of visual impact affecting users of the Heysen Trail (refer visual impact analysis, in the Architectural Design Statement - **Appendix L**).

Traffic - As detailed in the traffic assessment section of this DR, the proposed development will not result in adverse traffic impacts. Additional vehicle movements on Golflinks Road are proposed. The Traffic Impact Assessment at **Appendix I**, finds that "while it is acknowledged that there will be an increase in movements on the adjacent road network as a result of the proposal, it is considered that the traffic impacts will be within acceptable levels and not result in significant impact on other road users in the vicinity of the site". The traffic impacts arising from the intensification of the existing land uses results in a **neutral** impact to neighbours.

Lighting - The Proponent has not yet designed the lighting system - they are willing to accept a condition of consent which seeks the provision of a lighting plan and demonstrates compliance with the relevant standards in this regard. For the purposes of this assessment - it is assumed that the lighting system could operate within acceptable levels if it is designed to comply with relevant standards. The lighting impacts associated with the proposed development can be managed to result in **neutral** environmental impact.

Noise - A Noise Impact Assessment (NIA) has been provided in **Appendix R**. The NIA utilised a continuous noise survey over a 5-day period with the receiver placed at the boundary of the nearest sensitive receiver. The results of the survey were assessed against the noise criteria in the Planning and Design Code and the SA EPA Environment Protection (Noise) Policy 2007. The report concluded that the predicted noise levels at the nearest sensitive receiver will achieve the relevant criteria sought by the above sources as long as each speaker is limited to 90dBA at a distance of one metre, based on all four speakers used. This is a very high level of volume which would not be utilised during an event and therefore it is considered that there will be no adverse impacts on sensitive receivers as a result of speaker usage.

Additionally, the noise generated from patrons on both the terrace and inside the function hall was found to have no effect on the nearest sensitive receiver, even under worst case meteorological conditions (i.e. sound waves travelling further in lower pressure systems).

With reference to SA Planning and Design Code, nearby residential properties are located in two different land zones – Rural Neighbourhood and Productive Rural Landscape. The closest residents are located on land zoned Rural Neighbourhood. The indicative noise factors are 47dBA and 40dbA (day and night time) as per EPA requirements. The site is in the Recreation Zone where there are no indicative noise factors under EPA requirements. The NIA applied the most conservative case which assumed the same indicative noise factors as per Rural Neighbourhood. It also based the assessment on the measured noise levels at the proposed site. The nominated design criterion for continuous operational noise is achieved with this criteria applied.

Mechanical services are currently being developed and detailed recommendation will be provided once it is sufficiently developed. The NIA provides a note about the mechanical services assessment included in Page 13.

The acoustic impacts arising from the intensification of the existing land uses results in a **neutral** environmental impact to neighbours.

On review of the Code in response to land use and with reference to the impact assessment sought by Guideline 8, the proposed land uses are acceptable. The level of impact arising from the intensification of the existing land uses on the site results in:

- Medium visual impact,
- Neutral lighting impact (subject to further investigation and control to be enforced through conditions of consent),
- Neutral traffic impact,
- Neutral noise impact.

Post development, the proposed level of amenity for neighbours should not be adversely affected in terms of lighting, traffic and noise. A medium visual impact will occur, this is primarily as viewed from the Heysen Trail and not by adjacent landowners.

4.9 Native Vegetation

Medium

Native vegetation is proposed to be removed to facilitate the development. The land is located in the Native Vegetation Overlay and State Significant Native Vegetation Overlay under the Code. A total of 1.758 ha of native vegetation is proposed for clearance, including:

- 0.0.261 ha of VA A1a – *Eucalyptus viminalis* ssp. *viminalis* and *Eucalyptus obliqua* over *Acacia melanoxylon*.
- 1.307 ha of VA A1b – *Eucalyptus viminalis* ssp. *viminalis* and *Eucalyptus obliqua* over *Acacia melanoxylon* and degraded understorey.
- 0.091 ha of VA A1c – *Eucalyptus viminalis* ssp. *viminalis* +- *Eucalyptus obliqua* over exotic understorey.

- 0.013 ha of VA A2 – *Eucalyptus viminalis* ssp. *viminalis* +- *Eucalyptus obliqua* over *Pultenaea daphnoides*.
- 0.144 ha of VA A13 – *Eucalyptus viminalis* ssp. *viminalis* +- *Eucalyptus obliqua* +- *Acacia Melanoxylon* over exotics
- A total of 57 scattered trees are proposed for removal within the Project Area, which includes 6 *Acacia melanoxylon* (Blackwood), 23 *Eucalyptus obliqua* (Messmate Stringybark), one *Eucalyptus viminalis* ssp. *cygnetensis* (Rough-bark Manna Gum) and 27 State Rare *Eucalyptus viminalis* ssp. *viminalis* (Manna Gum) from poor to excellent in health.

The Level of clearance is Level 4.

The following Appendices provide a detailed assessment against the Native Vegetation Act 1991:

- Native Vegetation Data Clearance Report prepared by EBS Ecology (**Appendix Z**).
- Ecology Fauna and Flora Assessment prepared by EBS Ecology (**Appendix O**).

Additional assessment regarding significant and regulated trees proposed to be removed is provided in the Tree Impact Assessment at **Appendix G**.

To offset the loss of native vegetation a payment of \$439,095.19 , which includes a \$22,891.21 administration fee is proposed to be paid into the Native Vegetation fund.

The proposed development results in **neutral** environmental impacts with regard to native vegetation removal given this level of offset. For a full assessment of the issues reference should be had to the EBS Ecology Report referenced above.

4.10 Native Fauna

Medium

A detailed fauna assessment is provided in Native Vegetation Data Clearance Report prepared by EBS Ecology (**Appendix Z**).

A total of 22 fauna species were recorded within the Project Area, 20 were birds and two were mammals. No fauna species listed under the EPBC Act were recorded within the Project Area. One fauna species listed under the NPW Act as Rare was recorded in the Project Area:

- Common Brushtail Possum (*Trichosurus vulpecula*).

This species was observed directly adjacent to the main building of the Golf Club.

One of the species recorded within the Project Area is introduced fauna:

- Common Blackbird (*Turdus merula*).

Fauna species observed during the survey are provided in Appendix 3 of **Appendix Z**.

A range of Nationally threatened fauna species were assessed as likely to occur within the Project Area. A total of 11 State listed fauna species that have records within 5 km of the Project Area were assessed as highly likely / known or likely to occur within the Project Area. Reference should be had to **Appendix Z** for detailed discussion on each of these species.

The potential impacts to flora and fauna were assessed by EBS as:

“The Project Area is largely comprised of pockets of remnant native vegetation, scattered trees and planted (amenity) vegetation associated with the golf course. MGCP is directly adjacent to the Project Area and supports a large assemblage of both nationally and State listed flora and fauna (DEH 2006). Few patches of naturally occurring native or remnant vegetation remain in the landscape, and those that do are generally impacted at some level by weed invasion and lacking an intact understorey. Regardless, vegetation that remains in the Project Area is of high habitat value as it provides a corridor for movement to better quality vegetation. Additionally, the remaining remnant scattered trees contain a significant number of hollows, likely to be utilised by less conspicuous or nocturnal species and utilised for nesting, either by birds or other fauna”.

EBS provided the following recommendations and considerations to protect flora and fauna on site:

- Retain high value vegetation where possible, particularly those areas assessed as having high fauna habitat value (in particular trees/vegetation with a high biodiversity score and trees with hollows) and consider Project design that avoids this constraint.
- Utilise existing disturbed areas including areas defined as exotic vegetation for Project infrastructure where possible. See Appendix 10 for a map and photographs of suggested areas and routes that EBS recommends in order to avoid impact to native vegetation.
- Ensure infrastructure is sufficiently located away from large remnant trees (i.e., a minimum of 10 metres away but preferably outside of the Tree Protection Zone (TPZ) of trees).
- Ensure that the design and construction methods minimise impacts to all vegetation, as much as possible, including impacts to the TPZ of large remnant trees.
- Vegetation clearing required for the Project outside the parameters of maintenance activities would require approval under the Native Vegetation Act 1991 (NV Act). This would require a Clearance Data Report and a Clearing Application lodged with the Native Vegetation Council. The completion of additional field work may also be required.
- If native flora species that provide suitable resting, foraging and breeding areas for some fauna species are impacted by works then a suitably qualified fauna spotter (or the likes) needs to assess the presence of fauna prior to any flora removal.
- Collate additional information to determine if a referral under the EPBC Act (i.e., undertake an EPBC Self-assessment of MNES, conduct targeted threatened species surveys), is required.
- Develop a Construction Environmental Management Plan (CEMP) for the construction phase of the project that includes detailed strategies for the management of native vegetation and fauna. This should include the management of Declared and Environmental weeds across the Project Area to prevent their spread into surrounding areas as well as Phytophthora risk.

With these recommendations in place, the proposed development results in **neutral** environmental impacts with regard to native fauna.

4.11 Flooding and Water Quality

Medium

The proposed development is located within the Mount Lofty Ranges Catchment (Area 2) Overlay, which seeks to ensure that development has a neutral or beneficial effect on the water quality harvested from secondary reservoirs or diversion weir catchments. The Hazards (Flooding – Evidence –Required) Overlay seeks the management of potential flooding of infrastructure and buildings.

The Stormwater Management Plan (**Appendix U**) and Integrated Water Management Plan (**Appendix DD**) provide detail on:

- The effects on water quality and methods for managing this.
- How wastewater and effluent disposal will be managed.
- Minimising erosion to Cox Creek.
- The impacts of surface water to downstream flows and proposed mitigation methods.

Lake and dam levels will be managed through the pumping of stormwater storage ponds throughout the golf course for use as irrigation. Weirs will manage peak levels within the lake which will feed into Cox Creek when required.

Existing drainage pits and pipes will be retained and reused to minimise the construction impact. New stormwater pipework will be laid within the building footprint and collect all rainwater runoff from storm events up to the 10-year ARI level into a below ground drainage pipe. Roof runoff will be collected into downpipes and stored in a retention tank within 100-year ARI overflows connected into the below ground outlet drain.

As the proposed site is located within the Onkaparinga Catchment of the Western Mt Lofty Ranges Prescribed Water Resources Area, the stormwater detention basin constitutes a water affecting activity under the Landscape South Australia Act 2019. It is anticipated that the design of the basin complies with the requirements set out in the Western Mt Lofty Ranges Water Allocation Plan – water storage and diversion structures section specifically.

- Approximately 150m³ detention storage basin with a staged flow control over the outfall to Cox's Creek to limit post-development flow rates to pre-development flow rates. Detention volume will be calculated and adjusted as necessary to ensure peak outflows do not exceed pre-development flow rates for the minor and major storm events respectively.
- Minimum 300mm freeboard from peak 1% AEP storm event basin water level, to emergency overflow weir to Cox Creek.
- Provision of 300mm of extended duration detention depth, sized to capture and treat the 3month ARI (4EY AEP) storm event for all runoff from the ground surface areas of the basin.
- Provision of 200micron stormwater filter baskets within all stormwater inlet pits within the development.
- Basin floor to be planted with effective nutrient removal native vegetation, deep filter media, transition layers and drainage layers in accordance with EPA/Water Sensitive SA best practice guidelines.
- Provision of emergency overflow to Cox creek via a rock lined weir or similar approved to mitigate erosion and protect the existing watercourse in the event of a blockage.

The stormwater management system complies with the South Australian EPA water quality reduction targets of:

- 80% retention of the typical urban annual load for Total Suspended Solids (TSS).
- 60% retention of the typical urban annual load for Total Phosphorus (TP).
- 45% retention of the typical urban annual load for Total Nitrogen (TN).
- 100% retention of the typical urban annual load for Gross Pollutants (litter).

All internal pipe specifications will be determined during the detailed design period of the development, however, minimum requirements to manage a 10% AEP storm event and use of 225 minimum diameter pipes will mitigate potential blockages and downstream flood risks. This will assist in protecting habitable buildings (refer to the stormwater concept within the FMG Stormwater Management Report (**Appendix U**)).

Overland flow paths divert surface water runoff towards the basin through naturally occurring depressions in the topography to minimise the need for excavation.

The Pod's will include individual retention/detention tanks as a self-sufficient unit. Discharge from these pipes will be managed via a main collector pipe or discrete outlets to the bushland surrounding the units, controlled by orifice and erosion protection elements. Post-development runoff will be managed with 1.5m³ stormwater detention volume per Pod.

As a part of the Stormwater Management Report, a Cox Creek drain model was created to predict the impacts of the development on the watercourse. Calculations indicate that the water depth of the watercourse may approach an increase of 2.5 metres with a maximum velocity increase of 5m/s during a 1% AEP major storm event. Rock rip-rap will be placed along the banks of Cox creek to protect the banks from erosion in a 1% AEP overflow event. Undertaking erosion control work within a watercourse requires a permit under the Landscapes South Australia Act 2019 obtained from the Hills & Fleurieu landscape Board. It is anticipated that these works will comply with the requirements set out in the Hills & Fleurieu Water Affecting Activity Control Policy.

Cox Creek is at an elevation of 412m AHD when measured directly downhill from the proposed development. The proposed development will be sited on elevations between 418-420m AHD (6-8 metres above the creek). The potential 2.5 metre increase will not increase the risk of the entrance of flood waters in the proposed development.

The proposed stormwater management system designs for post development peak flow to not exceed pre-development peak flows in an equivalent storm event. This aims to protect patrons as well as minimise erosion and water quality in Cox Creek. The management of pollutants within the stormwater runoff has been considered with high importance and all EPA water quality targets are proposed to be achieved.

Comparing the existing golf course operation and the proposed development, the management of flooding and improvements to water quality, arising from the development are **positive**. The proposed development provides appropriate flood mitigation and improves the quality of water prior to diversion to Cox Creek.

4.12 Surface Water

Medium

The proposed development is located in the Onkaparinga (reservoir) catchment. Cox Creek runs through the site. The proposed development has considered the potential for managing water resources through the Integrated Water Management Plan (IWMP) at **Appendix DD**. It provides the management approach to water supply, rainwater harvesting, stormwater, wastewater, and groundwater resources. The aim of the IWMP is to promote sustainable water use, minimize the impact of development on water resources, and ensure the long-term availability and quality of water resources.

The IWMP is designed to comply with best practice guidelines and requirements, namely the South Australian Environmental Protection Authority (EPA) and the SA Public Health wastewater requirements. Given the technical nature of the proposed surface water management approach the following extract of the IWMP is provided – for further detail reference should be made to the IWMP at **Appendix DD**:

“Under the proposed development, runoff from upstream catchments will be safely routed around the east and west of the proposed building, mimicking existing conditions and protecting the development from inundation. Runoff intercepted by the roof area will be harvested for reuse as outlined within the Water Balance section of this report. Runoff captured at surface level within the hotel will be collected into a minor stormwater pit and pipe network fitted with gross pollutant intercepting baskets, or conveyed via overland flow during a major storm event, towards a stormwater basin located adjacent Cox’s Creek. Within this basin a tertiary level water quality improvement will be achieved through use of a bioretention raingarden capable of treating at least the volume of runoff generated by the 4EY ARI in accordance with the EPA and Water Sensitive SA best practice guidelines.

Stormwater collected into the basin will also be detained to ensure post-development peak runoff does not exceed the pre-development peak runoff figures for the minor and major storm respectively. The detention volume held within this basin during the 1% AEP storm event is estimated to be in the order of 150m³. Should further investigations determine this basin is required to be enlarged, sufficient room exists along the length of Cox’s creek to increase the basin size. The basin is likely to be nominated beyond the 1% AEP flood level, however could be designed to be adequately protected within the floodway if required.

All wastewater infrastructure, general waste infrastructure and equipment storage facilities will be nominated within the footprint of the proposed hotel facility, which will be at or above the minimum FFL of 419.80mAHD, and adequately protected from upstream catchments which will be safely diverted around or away from the building along existing overland flow routes.

The detailed stormwater management plan can be found within Appendix C where further calculations are provided.

A review of SARIG mapping suggests a depth to groundwater in the order of 5-10m throughout the subject site. No works are proposed which will affect groundwater, however groundwater may be encountered during construction depending on proposed footing systems”.

The report concludes that the proposed development can be suitably designed to manage water both on site and within the surrounding catchment to mitigate negative effects on the environment. This was based on consideration to the EPA, SA Health and WSAA code requirements, along with best practices for stormwater management. The resultant impact is considered to be **neutral to positive**, given that within the

stormwater basin, there are water quality improvement mechanisms proposed. Further, that the existing infrastructure which is at the end of its useful life is proposed to be upgraded.

4.13 Heritage – First Nations People

Medium

A Cultural Heritage Management Plan (CHMP) is provided at **Appendix N** to plan for the management of sites and places of Aboriginal heritage should these be encountered during construction and on-going.

The CHMP outlines how risk will be managed and the controls that will be implemented to ensure that no damage is caused to Aboriginal heritage during the construction and operational phases of the development. The methods and procedures outlined in the CHMP are informed by the *Aboriginal Heritage Act 1988 (AH Act)*. The AH Act does not mandate a requirement for a cultural heritage survey where there is a low likelihood of disturbance of Aboriginal heritage. After a review of geotechnical survey data, flora and fauna survey and the arborist survey, it was determined that this was the case for the proposed development. Additionally, there are no Aboriginal places listed within the Australian Heritage Database within or near the subject site.

Mitigative techniques and management controls which will be implemented to avoid and minimise impact to Aboriginal cultural heritage values are as follows:

- Desktop assessment of registered and recorded sites via the Central Archive, including the Register of Aboriginal Sites and Objects, maintained by the Attorney General's Department.
- Utilise previously disturbed areas for infrastructure wherever practicable.
- Induct all staff and contractors on cultural heritage prior to any onsite construction work.
- Undertake a cultural heritage survey with native title claimants, if required.
- Develop and implement a Cultural Heritage Management Plan detailing the procedures for the identification, management and protection of Aboriginal cultural heritage sites including monitoring of ground disturbance activities in agreed locations with relevant traditional owner representatives, if required.

Construction Phase

During the construction phase of the proposed development, Aboriginal heritage protection and management measures include:

- Ongoing heritage inductions to make all project personnel aware of Aboriginal heritage sites and appropriate management procedures in place to avoid impact,
- Monitoring of construction works in higher sensitivity or higher risk locations by Kurna Yerta Aboriginal Corporation (KYAC) and Peramangk Peoples.
- Robust measures and procedures to address site discoveries during construction
- Where sites are identified during construction, Mount Lofty Golf Estate will aim to relocate works to mitigate impact
- If works are unable to be relocated, Mount Lofty Golf Estate will work closely with interested parties and the contractor to find a suitable solution in accordance with the requirements of the AH act.

- At the conclusion of construction Mount Lofty Golf Estate intends to undertake a compliance audit to ensure all heritage management conditions have been met and that the mitigation measures and control operated effectively.

Operational Phase

Ongoing compliance with the AH Act in accordance with the operational heritage management system (and any CHMP) in consultation with the KYAC will be practiced.

The above measures ensure that the project will avoid disturbing or damaging potential items of Aboriginal cultural significance during both the construction and on-going operation phase, and respond appropriately and responsibly in the case of any discovery event.

The CHMP provides the means for managing sites and places of Aboriginal heritage should these be encountered during construction and on-going. With strict compliance to the CHMP, the proposed development should result in **neutral** environmental impact with regard to Aboriginal Heritage. Opening the dialogue between the Proponent and the KYAC is also intended to provide **positive** social impacts.

4.14 Heritage – European

Medium

The site contains a Local Heritage Place ('the Perfumery'). The proposed development includes partial demolition, restoration, conservation, reuse and new built form elements to the Perfumery. A Heritage Impact Assessment (HIA) has been prepared (**Appendix BB**).

The Perfumery is currently used as the site maintenance building and office. It is dilapidated. The intent is to restore the existing building to its original state (or as close as possible) to a Perfumery / retail café space and construct an addition for use as a function space. Its refurbishment includes a new modern structure which sits adjacent to the Perfumery building, providing additional amenity and dining spaces. A Scent Garden adjacent the addition is also proposed. The materiality consists of glass and metal to provide a contrast and clear modern addition to the existing stone Perfumery building.

The HIA details the following with regard to European heritage impact:

- The adaptive reuse of the Perfumery will help to preserve and protect it, and the inclusion of a scent garden and orchard will establish a continued connection to its previous use as a local perfumery.
- Reusing the building will have long term benefits for the community as if the building cannot be incorporated into the golf course redevelopment, it will continue to deteriorate.
- The site of the Perfumery works are not situated on any known or potentially significant archaeological artefacts; however ground disturbance works may uncover artefacts relating to all stages of the development of the project area. This aspect is covered in the Cultural Heritage Management Plan (CHMP) at **Appendix N**. Which provides a procedure for management of uncovered archaeological items.
- The proposed work will not have an adverse impact on the current heritage values of the building but will rather enhance the heritage values (HIS, page 5).

The adaptive reuse of a local heritage item results in **positive** environmental, economic and social benefits.

4.15 Waste Management – Stormwater and Construction and Operational Environmental Management

Standard

This aspect of the proposed development has been addressed through the creation of the following management plans:

- The Waste Minimisation and Management Plan - this plan identifies waste sources during the construction and operation phases and outlines principles, procedures and on-going responsibilities of managing and minimising the waste materials generated by the development.
- The Construction Environmental Management Plan - this plan identifies the environmental protection measures, systems and tools to be implemented during the construction phase of the development.
- The Operational Environmental Management Plan - this plan employs a system for hazard and risk identification training for all staff and construction personnel to ensure deliverance of mitigation measures for the proposed development on-going.

These plans are discussed in detail in the following section of this DR. Adherence to the management measures outlined in these plans is anticipated to result in **neutral** impact.

4.16 Effects on the Physical Environment

Standard

The proposed development results in cut and fill on the land which will alter the land as existing. Plans detailing the extent of cut and fill are at **Appendix U**. These detail that the indicative estimated volumes of cut and fill are:

- Cut: -15,838m³
- Fill: +3,008m³
- Net = 12,829m³

The potential impacts to the natural topography of the land arising from cut and fill are:

- Alterations to surface water runoff - this is addressed in **Appendix U** the Stormwater Water Management Plan. Improvements to stormwater management and quality compared to existing are of note.
- Potential for increased sediment during construction - this is addressed in **Appendix T** the Construction Environmental Management Plan (CEMP). This item will be managed on-going during construction.
- Potential for increased erosion during construction - this is addressed in **Appendix T** the Construction Environmental Management Plan (CEMP). This item will be managed on-going during construction.
- Visual impacts resulting from changes to the landform - this is addressed in **Appendix E** through the provision of soft landscaping and the level of impact quantified in the visual analysis provided in **Appendix L**, the Architectural Design Statement. The visual impacts resulting from an altered land form are screened by the development i.e. basement car parking. The land is already altered to accommodate the golf course. Landscaping treatments and planting assist in reducing the visual impacts to the landscape.

The above impacts have been addressed in the various management plans appended to this DR. The resultant impact from this part of the proposal is considered **neutral**. The proposed development will not have a positive or negative impact on the physical environment in terms of land form.

4.17 Environment Food Production Area

Standard

The site is located within the Environment Food Production Area (EFPA) where productive agricultural land is expected to be retained for such land uses and it is sought that land is not subdivided for residential purposes. The site has an existing non-agricultural land use - The Stirling Golf Course. Future division of the land would not result in additional loss of agricultural land and would not impact the EFPA. No residential land uses are proposed as part of the development. The proposed land division seeks to formalise the tourist accommodation, golf and golf course areas and provide rights of way access. This is proposed for leasing purposes so that each area can be tenanted separately.

The resultant impact from this part of the proposal is **neutral**. It will not have a positive or negative impact on the EFPA.

5. Avoidance, Mitigation, Management and Control of Adverse Effects

This DR is supported by a suite of environmental and operational management plans to assist in the on-going management and mitigation of any potential impacts arising from the development. The management plans provide the means to avoid environmental impact and outline processes and procedures in the event that a risk arises.

The following management plans are appended to this DR:

- Waste Management and Minimisation Plan - **Appendix J**
- Cultural Heritage Management Plan - **Appendix N**
- Hazard Management Plan - **Appendix P**
- Bushfire Survival Plan - **Appendix Q**
- Bushfire Management Strategy - **Appendix Y**
- Construction Environmental Management Plan - **Appendix T**
- Stormwater Management Plan - **Appendix U**
- Operational Environmental Management Plan - **Appendix X**

For each plan, a summary of the approach is provided below. For additional detail, reference should be had to the relevant Appendices.

5.1 Waste Management and Minimisation Plan

The Waste Minimisation and Management Plan (**Appendix J**) details the proposed program for waste minimisation, mitigation and monitoring during the construction and operational phases of the project.

The Waste Minimisation and Management Plan identifies waste sources during the construction and operation phases and outlines principles, procedures and on-going responsibilities of managing and minimising the waste materials generated by the development. These are best reflected by the priority actions identified by the report which seek to:

- Avoid waste.
- Improve resource recovery.
- Increase use of recycled material and build demand and markets for recycled products.
- Better manage material flows to benefit human health and wellbeing, the environment, and the economy.
- Improve information to support innovation, guide investment and enable informed consumer decisions.

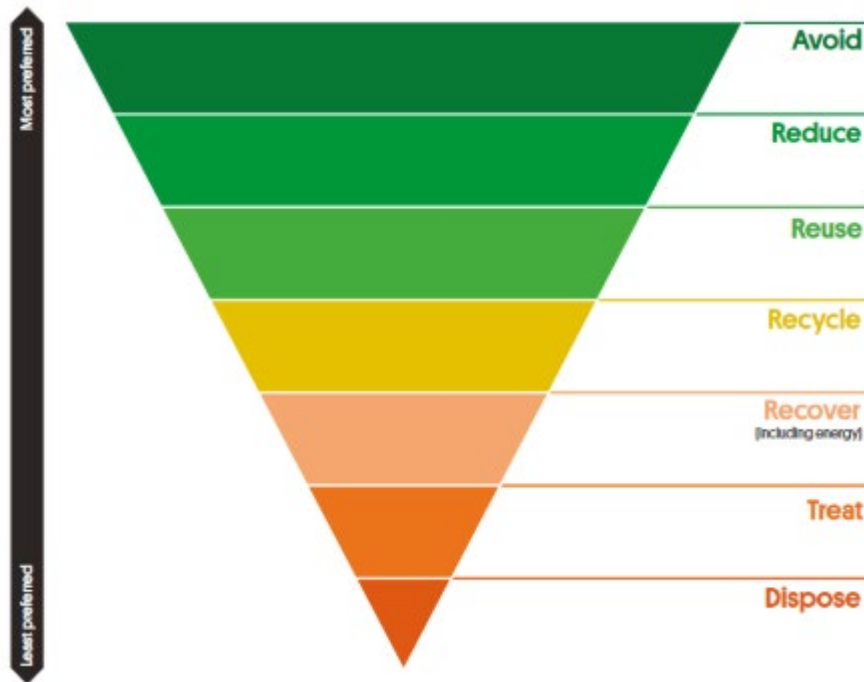


Figure 1 - Waste Management Hierarchy
 (“South Australia Waste Strategy 2020-2025”, 2020)

Specifically, the head contractor and site manager will be responsible for:

- Clearly separating and defining waste materials to facilitate processing or recycling.
- Subcontractor coordination to maximise on-site reuse of waste materials.
- Regular monitoring of on-site activities to ensure every aspect of the WMMP is implemented.

During the operational phase, the building management and maintenance staff will be responsible for:

- Ensuring waste is separated and defined to facilitate appropriate treatment and transportation.
- Ensure waste areas and transfer pathways are inspected and cleaned routinely to minimise contamination and keep hygienic.
- Ensure and uphold suitable waste training for all staff.

The Waste Minimisation and Management Report will be continuously updated and adapted to ensure the efficient collection, storage and collection of waste throughout the duration of the use.

5.2 Cultural Heritage Management Plan

A Cultural Heritage Management Plan (CHMP) has been prepared by EBS Heritage and is provided at **Appendix N**. The report provides an assessment of the impacts of the proposed development on the cultural heritage of First Nations People. The CHMP:

- Demonstrates the commitment by Mount Lofty Golf Estate to consulting and working with the Kaurna Yerta Aboriginal Corporation (KYAC, the registered native title body corporate for the Kaurna people.)

- Outlines how the Proponent will meet its statutory obligations under the Aboriginal Heritage Act 1988 (AH Act) in relation to the management and protection of Aboriginal cultural heritage.
- Demonstrates the measures that will be implemented to manage and protect Aboriginal cultural heritage in the pre-construction, construction and operation phases of the project.
- Demonstrates the cultural heritage stop work/discovery and reporting procedures should Aboriginal heritage be identified during either the construction or operational phases of the project.

5.3 Hazard Management Plan - Mount Lofty Golf Estate

A Hazards Management Plan has been prepared by Mount Lofty Golf Course Estate and is provided at **Appendix P**. The purpose of the Hazards Management Plan is to establish and maintain an effective health and safety management system. The report details a health and safety program which plans for and manages hazards, safety responsibilities and emergencies. The key components of the health and safety programs comprise:

- Training and supervision
- Written work procedures
- Hazard identification systems
- Workplace inspections
- Investigations of incidents and injuries
- Keeping records and monitoring effectiveness.

The on-going health and safety operations of the Mt Lofty Golf Course Estate will be upheld using the risk management process, which is broken down into the following five steps:

- Step 1: Identify the hazards
- Step 2: Assess the risk
- Step 3: Risk priority score and identify the necessary action and response
- Step 4: Control the hazards
- Step 5: Review the process

These processes will ensure that the safety of guests and staff are prioritised as well as creating a well educated culture of hazard management which will have broader benefits within the locality as potential hazards are identified early and managed appropriately.

5.4 Bushfire Survival Plan

A Bushfire Survival Plan has been prepared by BSP Design provided at **Appendix Q**. The Survival Plan is underpinned by the following priorities:

- Priority 1: Protection of Life - Ensures that all people who may be in danger are forewarned and that action is taken to guarantee their safety (including evacuation), before any steps are taken to prevent the spread of fire, secure assets or to fight the fire.

- Priority 2: Prevent Spread of Fire - Once complete evacuation has occurred, trained staff will begin preventing the spread of fire in the event that the Fire Service are unable to attend and a decision has been made to stay and defend.
- Priority 3: Protect Assets - Once all safety measures have been initiated, the protection of the assets of the estate can occur.

The Survival Plan also promotes the *leave early* approach to evacuation despite the buildings within the estate being designed to withstand radiant heat and ember attack. There will be a Chief Warden at the estate at all times during the bushfire season who will coordinate the time to leave early if required.

On days of catastrophic risk, the report promotes the decision to leave at the earliest possible time in order to uphold priority 1.

Designated assembly points will be indicated on Emergency Evacuation Plans that will be displayed throughout main buildings and including within all of the remote accommodation pods.

All staff will be instructed to manage guests under the guidance and instruction of the fire wardens.

The nearest designated safe precinct is the Stirling township, with the next alternative being Mount Barker. Staff and guests will be transported through a mixture of shared and personal transportation.

Additionally, on days of catastrophic risk:

- All staff will be briefed of the predicted fire risk and are able to review the safety plan with a particular emphasis on evacuation procedures and requirements.
- All expected guests will be contacted prior to their arrival to inform them of the fire danger with alternative arrangements for their arrival to be made to suit the fire danger rate of the following three days.
- Staff will inspect all rooms and ensure that windows are fully closed and that all external doors are fully closed.
- The last resort refuge area will be equipped with bottled water supplies and towels which can be used to provide relief from the raised temperatures.
- All fire fighting equipment on site will be checked to ensure its operation and set up on standby for immediate access when required.
- All ground will be checked for potential fuel sources such as leaf litter and cleared.

5.5 Bushfire Management Strategy

A Bushfire Management Strategy (BMS) has been prepared by BSP Design and is provided at **Appendix Y**. The purpose of the BMS is to set guidelines regarding the processes and procedures in the preparation for bushfires, particular responses and the actions required in the recovery following any bushfire event. The BMS is intended to be a fluid document which will be reviewed on a regular basis and amended/upgraded as necessary, particularly prior to any bushfire season. The key objectives of the BMS are as follows:

- **Preparation** - which primarily involves managing fuel loads, vegetation, access tracks, staff resources and any other arrangements to ensure that in the event of a bushfire all resources and services which are required to cope with the effects of an event are efficiently mobilised and deployed.

- **Response** - Encompasses actions taken in anticipation of, during and immediately after an event to ensure that its effects are minimised and that the affected people are given immediate relief and support.
- **Recovery** - is the restoring and improving of livelihoods and health as well as economic, physical, social, cultural and environmental assets and working to avoid and reduce future disaster risk.

These objectives are achieved through the following initiatives:

- Establishment of an Emergency Planning Committee (EPC) who are responsible for the implementation of the strategy and supervising emergency procedures.
- Mitigating the bushfire risk through vegetation management (refer Appendix A of the BMS).
- Asset management and record keeping to ensure all building specifications and materiality is easily accessible and available to all staff and emergency services.
- Implementation of the Buffer Zones (p.12, BMS).

5.6 Construction Environmental Management Plan

A Construction Environmental Management Plan (CEMP) has been prepared by FMG Engineering and is provided at **Appendix T**. The purpose of the report is to identify environmental protection measures, systems and tools to be implemented during the construction phase of the development.

These initiatives are intended to mitigate and minimise adverse environmental impacts as a result of the construction activities associated with the development. They are informed by the Guidelines for Environmental Management of On-Site Remediation (SA EPA, 2019) and the Guidelines prescribed by the SPC for the preparation of this development report. The CEMP is underpinned by the following objectives:

- To employ best management practices to ensure that the construction project meets environmental legislative requirements.
- To employ best environmental management practices to ensure compliance with all planning approvals and environmental authorisations.
- To employ best environmental management practices to minimise noise and vibration impacts.
- To apply best environmental management practice to soil and water quality management.
- To minimise air pollution from construction and associated activities.
- To protect any vegetation adjacent to the construction zone.
- To avoid pollution of the environment caused by fuels, oils or chemicals stored or used on the Project.

The report provides an in-depth analysis of potential risks and the associated mitigative actions which will be employed during the construction phase to achieve the above objectives. It outlines the mandatory training which will be provided in the forms of site induction, environmental management training and 'toolbox' training. The environmental management training will include incident reporting and response procedures to assign responsibility and enforce management of environmental risk.

5.7 Stormwater Management Plan

A Stormwater Management Plan (SMP) has been prepared by FMG Engineering and is provided at **Appendix U**. The installation of a new detention and water quality improvement stormwater basin located adjacent to Cox's Creek will achieve the following performance requirements:

- Approximately 150m³ detention storage with a staged flow control over the outfall to Cox's creek to limit post-development flow rates to pre-development flow rates. Detention volume will be calculated and adjusted as necessary to ensure peak outflows do not exceed pre-development flow rates for the minor and major storm events respectively.
- Minimum 300mm freeboard from peak 1% AEP storm event basin water level, to emergency overflow weir to Cox creek.
- Provision of 300mm of extended duration detention depth, sized to capture and treat the 3mo ARI (4EY AEP) storm event for all runoff from the ground surface areas of the basin.
- Provision of 200micron stormwater filter baskets within all stormwater inlet pits within the development
- Basin floor to be planted with effective nutrient removal native vegetation, deep filter media, transition layers and drainage layers in accordance with EPA/Water Sensitive SA best practice guidelines.
- Provision of emergency overflow to Cox creek via a rock lined weir or similar approved to mitigate erosion and protect the existing watercourse in the event of a blockage.

Additionally, all buildings have been designed so that the finished floor levels are above flood level to restrict the entrance of flood waters in the unlikely event of a flood.

The stormwater management system fully complies with the South Australian EPA water quality reduction targets of:

- 80% retention of the typical urban annual load for Total Suspended Solids (TSS),
- 60% retention of the typical urban annual load for Total Phosphorus (TP),
- 45% retention of the typical urban annual load for Total Nitrogen (TN),
- 100% retention of the typical urban annual load for Gross Pollutants (litter).

As the proposed site is located within the Onkaparinga Catchment of the Western Mt Lofty Ranges Prescribed Water Resources Area, the stormwater detention basin constitutes a water affecting activity under the Landscape South Australia Act 2019. It is anticipated that the design of the basin complies with the requirements set out in the Western Mt Lofty Ranges Water Allocation Plan – water storage and diversion structures section specifically.

5.8 Operational Environmental Management Plan

An Operational Environmental Management Plan has been prepared by Environmental Projects and is provided for at **Appendix X**. The OEMP employs a system for hazard and risk identification training for all staff and construction personnel to ensure deliverance of mitigation measures.

A Key Aspects, Potential Impacts and Risk Analysis matrix has been created (pg. 13, Environmental Projects, 2022) which analyses the potential impacts, receptors, risk categorisation and mitigation measures relating to the following items:

- Soil and groundwater.
- Stormwater, site erosion and sedimentation.
- Asbestos.
- Wind.
- Protection of trees and vegetation.
- Noise and vibrations.

The OEMP provides an integrated approach to the management of the proposed development during the operational phase, its purpose is to capture the management measures outlined in the suite of management plans appended to this DR. The OEMP provides the means to which the on-going performance of the environmental aspects of the proposed development and its environment can be measured, controlled and safeguarded.

6. Conclusion

This DR was required due to the nature of the proposed development, the need for a broader assessment and investigation. Of the 17 Guidelines, 5 were listed as requiring a critical level of assessment, 9 required a medium level of assessment and 3 a standard level of assessment. On balance, the proposed development results in neutral to positive environmental, social and economic impact.

In summary, the neutral impacts i.e. those which do not result in adverse amenity impact and/or can be managed through avoidance, mitigation and/or control, are:

- Vegetation removal.
- Increased traffic movements to Golflinks Road.
- Increased demand for car parking.
- Increased vehicles using Old Carey Gully Road during construction.
- Increased number of people in High Risk Bushfire Area.
- Visual impacts from the Heysen Trail.

The positive impacts are:

- Improvement to landscape quality.
- Adaptive reuse of a local heritage item.
- Improvement to water quality treatment compared to pre-development.
- Better connectivity to Heysen Trail.
- Internal site upgrades to facilitate better accessibility for service vehicles and fire-fighting vehicles compared to pre-development.
- Increased local employment during construction in the Adelaide Hills
- Increased employment during construction.
- Increased employment during operation.
- Minimal visual impact from Golflinks Road.
- Retention and improvement to the golf club as an important community asset which has positive social impacts.
- Improved meeting facilities for great social and community interaction which has positive social impacts.
- Promotion of golf in the area – a healthy pass-time which has social and economic benefits.
- Positive economic contribution to the Adelaide Hills economy during construction.
- Positive economic contribution to the States economy.
- Positive economic contribution to the Adelaide Hills economy.

The proposed development has demonstrable need in the Adelaide Hills. It is of high quality and design and on balance, the additional investigations sought by SPC have been addressed in this DR. The Minister for Planning can reasonably proceed this application to public exhibition.

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- South Australian Tourism Commission (SATC), 2019, *South Australian Visitor Economy Sector Plan 2030*

Appendix A

The Guidelines

Appendix B

Detail Survey - Alexander & Symonds

Appendix C

Plan of Subdivision - Alexander & Symonds

Appendix D

Architectural Drawings – RArchitecture

Appendix E

Landscape Architecture Drawings and Species List – Oxigen

Appendix F

Economic Analysis - Hudson Howells

Appendix G

Tree Impact Assessment - Arborman

Appendix H

Sustainability Strategy Report – Dquared

Appendix I

Traffic and Access Impact Statement – Cirqa

Appendix J

Waste Management and Minimisation Plan – Cirqa

Appendix K

Geotechnical Investigations - FMG

Appendix L

Architectural Design Statement – RArchitecture

Appendix M

Environmental Heritage Impact Assessment Report - EBS Ecology

Appendix N

Cultural Heritage Management Plan - EBS Heritage

Appendix O

Ecological Flora and Fauna Assessment - EBS Ecology

Appendix P

Hazard Management Plan - Mount Lofty Golf Estate

Appendix Q

Bushfire Survival Plan - BSP Design

Appendix R

Environmental Noise Assessment Report – BESTEC

Appendix S

Services Infrastructure Summary – LUCID

Appendix T

Construction Environmental Management Plan – FMG

Appendix U

Stormwater Management Plan – FMG

Appendix V

BAL Assessment - BSP Design

Appendix W

Industry Letters of Support

Appendix X

Operational Environmental Management Plan - Environmental Projects

Appendix Y

Bushfire Management Strategy - BSP Design

Appendix Z

Native Vegetation Clearance Data Report - EBS Ecology

Appendix AA

Architectural Renders – RArchitecture

Appendix BB

Heritage Impact Statement - EBS Ecology

Appendix CC

Certificate of Title

Appendix DD

Integrated Water Management Plan – FMG

Appendix EE

Perfumery Landscape Plans - Oxigen

Appendix FF

Perfumery Detail Survey

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