

COUNCIL ASSESSMENT PANEL MEETING

9 August 2023

AGENDA – 9.1

Applicant: The Mount Lofty Golf Estate Pty Ltd	Landowner: The Mount Lofty Golf Estate Pty Ltd
Agent: Matthew King-URPS	Originating Officers: Doug Samardzija & James Booker
Development Application:	21/444/473
Application Description: Redevelopment of the Stirling Golf Club – which includes: <ul style="list-style-type: none"> a) the construction of tourist accommodation in a new hotel building and private retreats (pods); b) new clubhouse facility and pro-shop, administration areas and change rooms; c) retention and improvements to the 18-hole golf course; d) conservation works and adaptive reuse of a local heritage place to accommodate a multipurpose café, retail and function space; e) car parking in the order of 200 spaces in two parking areas; f) tree removal (including native vegetation) and associated landscaping; and g) subdivision of the one allotment into 3 allotments 	
Subject Land: Lot:53 DP:59212 CT:5891/805	General Location: 35 Golflinks Road Stirling Attachment – Locality Plan
Assessment: GUIDELINES set by State Planning Commission, March 2022	Zone/Policy Area: Recreation Zone under the PDI Act Public Purpose Zone and Recreation and Sports Policy Area under the Development Act 1993.
Form of Development: Major Development	Site Area: 39.9 hectares
Public Notice: Formal public consultation occurs between 05 July 2023 and 16 August 2023. Notice was published in both The Mount Barker Courier and The Advertiser on 05 July 2023.	Representations Received: N/A Representations to be Heard: N/A

1. EXECUTIVE SUMMARY

The application involves the redevelopment of the Stirling Golf Club – which includes:

- a) the construction of tourist accommodation in a new hotel building and private retreats (pods);
- b) new clubhouse facility and pro-shop, administration areas and change rooms;
- c) retention and improvements to the 18-hole golf course;
- d) conservation works and adaptive reuse of a local heritage place to accommodate a multipurpose café, retail and function space;
- e) car parking in the order of 200 spaces in two parking areas;
- f) tree removal (including native vegetation) and associated landscaping; and
- g) sub-division of the one allotment into 3 allotments.

The subject land is located within the Recreation Zone as identified in the Planning and Design Code. It was previously located within the Public Purpose Zone and Recreation and Sports Policy Area as identified in the revoked Adelaide Hills Development Plan. On 17 December 2020, the Minister for Planning and Local Government declared that the proposed development is to be assessed as a Major Development pursuant to Section 46 of the *Development Act 1993*.

The Major Development assessment pathway is considered the most rigorous level of development assessment in South Australia and is reserved for major projects of economic, social or environmental importance to the State. Major Developments cannot be properly considered under existing assessment pathways (such as an assessment under the Development Plan or the Planning and Design Code), due to the nature, scale and extent of their potential impacts; where the effects of those impacts are unknown or more uncertain, or in situations where the environment is considered sensitive. The State Planning Commission (SPC) is responsible for setting the level of assessment required with the potential for it to fall within 3 different categories. These categories are Environmental Impact Statement (EIS), Public Environmental Report (PER) or Development Report (DR). In this instance SPC determined that the proposal's best fit was within the Development Report assessment pathway due to nature and scale of the issues which needed to be considered.

The Department for Trade and Investment - Planning and Land Use Services have advised that the public consultation period for the development is between 5th of July 2023 and 16 August 2023. Adelaide Hills Council has also been invited to provide comments on the Development Report (DR) Pursuant to Section 46D(5)(a) of the *Development Act 1993* and Section 63E(b) of the *Development Regulations 2008*, with comments due within the same timeframe allowed for notification.

Council's administration has undertaken a thorough review of the documentation provided and formally consulted with all the relevant departments and stakeholders within Council. The report below has been structured to provide commentary on the following matters:

- General description of the proposal.
- Description of the subject land and the locality.
- Planning commentary which includes outlining the role of planning policies in the process, describing the relevant zoning policies under the revoked Adelaide Hills Council Development Plan and the current Planning and Design Code policies, including relevant policies of the Recreation Zone.
- Detailed review and comments/concerns from relevant Council Departments which include Open Space Team, Community Waste Management, Economic Development/Community Capacity, Local Heritage, Community & Cultural Development, Engineering Department and Sports and Recreation.
- A list of matters still to be adequately addressed and recommended conditions that relevant department deemed appropriate should the proposal be approved.

2. DESCRIPTION OF THE PROPOSAL

The purpose of this application is construction of a 5 level tourist accommodation (hotel) building comprising 56 hotel suites, 15 two bedroom serviced apartments, 15 three bedroom serviced apartments and 2 penthouse serviced apartments, 17 private retreats (pods), 5 level golf course and guest facilities building (ancillary bar, gymnasium, multipurpose function rooms, restaurant, café and wellness centre), together with associated car parking, landscaping, subdivision of land (1 into 3), tree and native vegetation removal & retention of the 18-hole golf course with improvements.

A more detailed breakdown of the proposal includes:

- Construction of tourist accommodation (hotel) building ranging between 3 and 5 storeys in height and comprising 56 hotel suites, 15 two-bedroom serviced apartments, 15 three bedroom serviced apartments and 2 penthouse serviced apartments with back-of-house, plant storage and maintenance areas, function room, restaurant and external terrace, sports bar, gallery, café and wellness centre and associated carparking.
- 17 private retreats (pods) and 1 back of house service pod.
- Adaptive reuse of the Local Heritage Perfumery building as a retail, café and multipurpose function space.
- Construction of golf course facility building ranging between 2 and 5 storey in height and comprising function facilities, cart storage and clubhouse, pro-shop, administrative area, gym and change rooms and associated carparking.
- Two large on-site carparking areas incorporated within the two buildings to provide a combined 200 parking spaces.
- Retention of the 18-hole golf course with improvements and reconfigurations.
- Stormwater detention basin, creek, and lake restoration activities.
- Construction of entry wall and new entry signage at the existing Golflinks Road entry.
- Subdivision of existing allotment 53 of 39.9 hectares into 3 allotments for the development as follows:
 - Proposed allotment 531 of 38.4 hectares will contain the 18-hole golf course,
 - Proposed allotment 532 of 9924m² will contain the tourist accommodation building and pods and
 - Proposed allotment 533 of 5056m² will contain the golf club and associated facilities.
 - Subdivision is proposed to occur as a very last stage of the proposal once all the construction work has been completed.
- Native Vegetation removal

3. THE SUBJECT LAND AND PHYSICAL CHARACTERISTICS

The subject land is an undulating irregular shaped allotment of approximately 39.9 hectares identified as 35 Golflinks Road, Stirling or Allotment 53 in Deposited Plan 59212 contained in Certificate of Title Volume 5891 Folio 805.

The site has multiple road frontages which include Old Carey Gully Road, Golflinks Road, Range View Drive as well as the unmade Davenport Road, all of which are under care and control of the Council. The primary access to the site is gained via the eastern portion of Golflinks Road near the intersection with Hoylake Avenue.

The site currently features an 18-hole golf course with associated Stirling Golf Club facilities and car parking and a five room motel. The site also includes a local heritage listed place described as the cottage and previously used as the Scent Factory. Cox Creek runs west to east through the middle of the property. Additionally, the allotment accommodates a large dam and a dense cover of native vegetation. Part of the allotment, along with the unmade Davenport Road also forms part of the Heysen Trail.

The land is located approximately 2.5km north-east of the township of Stirling.

The land has an Open Space Proclamation registered on the Title to preserve the land as open space and to prohibit the land being divided into allotments for any purpose not in keeping with its character as an open space. The proclamation was made by the Governor of South Australia on 10 July 1975 under section 61 part VI of the revoked *Planning and Development Act 1967*. Even though the Proclamation predates current legislation it remains in force under legislative transitional provisions. Pursuant to S61(2) of the revoked *Planning and Development Act 1967* the owner of land can make application to vary or revoke the existing Proclamation. There is a separate defined statutory process to vary or revoke an open space proclamation and State Assessment staff advise it is a matter for the Minister for Planning to consider and action subject to Cabinet and Executive Council deliberations but only once there is a decision on the proposal.

Statement Assessment staff have advised that the Proclamation was noted at the time the major development declaration was made, but it was considered it did not prevent the major development assessment being undertaken, nor a decision being made on the proposal. Furthermore, they advise that many golf courses in the 1960s and 1970s have this Proclamation but no new proclamations have been made since 1980. It is understood that one of the main purposes of the proclamations on private land and the restriction of further sub-division was for the assessment of rates and taxes that are based upon land valuation. There is a layer in SAPPA to map their locations to assist with the assessment of facilities as they are redeveloped.

4. THE LOCALITY

The locality is defined by a mixture of allotment sizes and patterns with varying land uses. Both the immediate and the wider locality are separated into three different zones all with varying envisaged uses. Immediately to the south of the subject land along Golflinks Road and Old Carey Gully Road is a cluster of residential allotments ranging in size between 800m² and 7000m². These allotments are in a Rural Neighbourhood Zone under the current Planning and Design Code (formerly known as the Country Living Zone under the revoked Adelaide Hills Council Development Plan). This zone predominantly anticipates residential uses. Immediately to the west and the north are allotments in the Productive Rural Landscape Zone (formerly known as the Watershed Primary Production Zone). These allotments vary in sizes and uses but are predominantly used for either rural residential or primary production related activities. That being said, the allotment immediately to the north and directly on the opposite side of Old Carey Gully Road contains the Scouts SA Woodhouse complex. All the land immediately to the east of the subject land is Council owned land which forms part of the Mount George Conservation Park and is located in the Recreation Zone (formerly known as the Public Purpose Zone). All of these properties are

predominantly serviced by low volume Council owned roads, constructed and maintained at a standard appropriate for the rural living zone and its uses.

The immediate locality is also defined by natural features which include water courses and dense native vegetation, located on private allotments as well as Council road reserves and within the Mount George Conservation Park.

Within the wider locality to the west and south-west of the subject land is the suburb of Crafers. Immediately to the south adjacent to the freeway is the suburb of Stirling. The majority of the properties in these areas are of residential nature with a mix of commercial uses predominantly in town centres and along the main streets of Crafers and Stirling. Further north of the subject land is the suburb of Piccadilly whilst to the east is the suburb of Mount George. The majority of these properties are used for rural residential or primary production related activities.

Other notable elements of the locality include the small cluster of local and state heritage listed buildings on allotments immediately opposite the subject land on Old Carey Gully Road as well as the South Eastern Freeway, which is approximately 375m south of the subject land.

5. PLANNING OVERVIEW

5.1 The role of planning policies in the process:

The *Development Act 1993* requires the DR to state the consistency of the expected impacts of the proposed development with the relevant Planning Policy and specific assessment guidelines endorsed by the independent State Planning Commission (SPC). As a point of clarification, it's important to outline that at the time when the proposal was declared Major Development by the Minister, the *Development Act 1993* and Adelaide Hills Council Development Plan were in effect. Since then, the *Planning, Development and Infrastructure Act 2016* as well as the Planning and Design Code came into effect.

To provide context of the locality and what is envisaged, the below commentary provides a summary and a breakdown of the zoning policies under the revoked Adelaide Hills Council Development Plan as well as the current Planning and Design Code for clarity on what the zoning used to envisage under the previous planning system and how those policies transferred across into current system.

5.2 Policy and zone intent under revoked Adelaide Hills Council Development Plan:

Under the revoked Adelaide Hills Council Development Plan the subject land was located in a Public Purpose Zone and within the Recreation and Sport Policy Area. In the order of hierarchy for assessment the policy area provisions were of higher priority than the zone provisions, and provided more specific policies for that particular locality whilst, the zone policies considered a wider locality. In this instance, the policy area objectives were seeking to accommodate development for a range of sporting, recreational, entertainment, cultural and exhibition events and associated spectator facilities with car parking within a landscaped setting. A multipurpose sporting facility was envisaged for the policy area, which minimised impacts on nearby residents and the locality.

Some of the envisaged uses for the Policy Area included childcare facilities, clubrooms associated with sporting facilities, facilities for the use of tourists and visitors, indoor and outdoor recreation facility, shop associated with the community club or services, spectator and administrative facilities ancillary to recreation development, and playground along with a range of other uses

associated with community or recreational facilities. Notably the Policy Area excluded tourist accommodation as an envisaged land use.

All the provisions of the policy area associated with uses envisaged encourages these to be primarily for public and private recreational and community purposes. High emphasis is placed on active multipurpose recreational activities with associated spectator facilities. All structures designed for those uses were required to exhibit a standard of design which would enhance the visual attractiveness of the zone whilst ensuring the preservation of native fauna habitats. Buildings were generally envisaged to a height of 6m whilst buildings associated with active indoor recreational activities were anticipated to the height of 10m. Although the buildings proposed do not include active indoor recreational uses, the 10m provision could be used as a guide. The proposed building has a maximum height of 20.9m, well above the 10m provision for the Policy Area. Despite this, the development provides generous setbacks, is located on the footprint of existing buildings and includes significant variation of building height which adds visual interest.

The Public Purpose Zone envisaged development being primarily for public use or in the case of private, being of social benefit to the community, whilst being sensitive to the natural environment. Development was generally sought to be integrated in function whilst also being of a scale compatible with existing buildings and the surrounding area whilst exhibiting high architectural standard with associated landscaping to enhance the amenity of the locality. The general uses envisaged included education facilities, community centres, recreation reserves, conservation park tourist facilities, research facilities as well as facilities for the aged within certain parts of the zone.

From a built form perspective, the Zone provisions envisaged development designed in such a way that it was of a scale and situated in a location which was unobtrusive and did not detract from the natural character. To achieve this, it was anticipated that buildings were located below the ridge line and within a valley, were set well back from public roads and clustered where possible to ensure that the majority of the site remained open in appearance. To further reduce the mass of buildings, incorporation of variations in wall and roof lines and external materials of natural colours to blend in with the natural and rural landscape were sought. High emphasis was also placed on conserving natural features and on the inclusion of appropriate landscaping in the design. As the proposed built form has generous set-backs provided, it is considered that the general intent of the Appearance of Land and Buildings section of the zone is achieved.

It is also noted that the design of the buildings have been assisted by advice provided by the Government Architect.

5.3 Policy and zone intent under the current Planning and Design Code:

Under the Planning and Design Code the subject land is located within the Recreation Zone. The intent of the Zone is very similar to that of the Recreation and Sport Policy Area of the Development Plan described above. The Desired Outcome of the Recreation Zone simply seeks a provision of a range of accessible recreational facilities. This is further summarised by the first Zone Performance Outcome which seeks development that is associated with or ancillary to the primary purpose of structured, unstructured, active and or passive recreational facilities with the corresponding Designated Performance Feature providing a list of specific envisaged uses that fall within the sphere of recreational uses.

From a land use perspective, it is evident from other policies in the zone that it is envisaged for properties to be used for a variety of different recreational purposes with emphasis also put on allowing uses which could be subordinate to the principle recreational purpose(s). These uses range from a restaurant, office and tourist accommodation whilst also encouraging complementary activities such as horse breeding and keeping, sales and training activities as well as storage and maintenance of racing vehicles associated with motorsport racing which is also one of the envisaged uses which fall under the ambit of recreation facilities.

From a built form perspective, the zoning provides lot more flexibility for building heights than what was envisaged under the Development Plan, especially for larger allotment sites such as the subject land. The Recreation Zone does not provide guidance on building height, nor does it provide a Technical and Numeric Variation (TNV) in relation to building height.

5.4 Development in reference to Recreation Zone under Planning and Design Code:

As outlined in the above paragraph, the Desired Outcome of the Recreation Zone in the Planning and Design Code seeks a range of accessible recreational facilities. The existing use of the land is predominantly an 18-hole golf course with associated golf club facilities all which fit in the ambit of recreational use of land. The proposed development is seeking to continue the use of the land by retaining and upgrading the 18-hole golf course including its reconfiguration. The proposal also involves further intensification through construction of a golf course facility ranging from 2 to 5 storeys in height and comprising function facilities, cart storage and clubhouse, pro-shop, administrative area, gym and change rooms. It is therefore considered that this proposed element of the development fits within the Desired Outcome of the Zone.

As outlined in the description of the proposal, there are a number of different elements to this project. Apart from the continued and increased recreational use, the construction of a large tourist accommodation facility with added function room, restaurant, sports bar, café, wellness centre along with the adaptive reuse of an existing Local Heritage building as a separate multipurpose café and function space are additional uses proposed in association with the recreational facility. Performance Outcome 1.1 in the Zone seeks development which is associated with or ancillary to the primary purpose of the structured, unstructured, active and/or passive recreational facilities. The corresponding DPF provides a broad list of some of those envisaged uses with tourist accommodation and shops both specifically listed. Whilst not all the proposed uses such as a function venue is listed, it is not uncommon for those activities to be associated with large scale tourist accommodation use or a recreational facility. On balance, the proposal satisfies the intent of the Performance Outcome 1.1 by providing integrated and compatible recreational and commercial land uses, albeit at a large scale.

As mentioned earlier in the report, the proposal will include extensive building work. The two largest proposed buildings are the golf club facility building and the tourist accommodation (hotel) building. The tourist accommodation facility is a stepped design ranging between 3 and 5 storeys in scale with a combined overall height of 20.9m. The building features accommodation rooms, with back-of-house, plant storage and maintenance areas, function room, restaurant and external terrace, sports bar, gallery, café, wellness centre and associated carparking with a combined floor area of 11,024m². The golf club facilities building is similar in nature and design ranging from 2 to 5 storey in scale with a combined overall height of 20.2m. It features function facilities, cart storage and clubhouse, pro-shop, an administrative area, gym, change rooms and associated carparking, with a total combined floor area of 8839m². The two buildings combined have a total proposed floor area of 19863m².

Both buildings are proposed to be nestled within the allotment and clustered primarily in the area where the existing clubrooms and associated facilities are located. The structures are proposed to be well separated from all allotment boundaries with the setback from Golflinks Road in the order of 180m. Whilst numerically the buildings appear large in bulk and scale, they will not present significant visual impacts from public realm or any of the neighbouring properties. Additionally, the proposed tourist pods and café within the Local Heritage Place are of a small scale and will have no visibility from outside of the site. Considering the levels of the land where the buildings are proposed relative to Golflinks Road, the distance of the buildings from the boundaries and vegetation cover, the overall bulk and scale of the buildings will present minimal visual amenity impacts for the locality. The proposed development is therefore considered to satisfy the built form requirements envisaged for the Zone. Additionally, the design adequately addresses the mass and scale of the buildings from an interface perspective with nearby residential properties in the adjacent Rural Neighbourhood Zone.

6. REFERRAL RESPONSES FROM COUNCIL DEPARTMENTS

6.1 Open Space Team:

Council's Open Space Team have reviewed the relevant documents, inspected the locality, and provided detailed comments in relation to the project. The Open Space team have identified a list of concerns with the proposal and have also advised that the level of information provided is lacking and does not adequately address impacts on vegetation. Below is a summary of the comments provided along with the list of recommendations.

6.1.1 Commentary:

- The landscape drawings only provide approximate locations of the proposed vehicle crossovers to Council roads. No measurements or formal design specifications have been provided that enable impacts to the existing vegetation within the road reserves to be fully established.
- Based upon the approximate vehicle crossover locations provided, minimal impacts to Council managed vegetation of value appear likely in the following locations:
 - Existing Old Carey Gully Road crossover (north of hole 8)
 - New western crossover location on Golf Links Road
 - Existing eastern main entry crossover location on Golf Links Road
- A variety of Council managed mature native trees are situated to either side of the central, new proposed vehicle crossover location on Golf Links Road. Careful consideration is required to ensure the design of this crossover does not adversely impact tree health or sustainability.
- The scope of the Arboriculture report only provides information regarding recommendations to tree management directly around the building works within the centre of the Golf Links itself. While the report is comprehensive, and controls recommended are sufficient to ensure trees are substantially maintained. The scope of the report is constrained to the main development site.
- No formal assessment appears to have been undertaken of development impacts to trees throughout the remainder of the impacted land parcel or within the impacted road reserve areas.
- No information has been provided regarding the required underground service provisions that would likely need to traverse through the road reserves or other area of private land.

- The road verge reflects native tree species of note *Eucalyptus dalrympleana* - Candlebark (Conservation Status - Rare), the understory unfortunately is degraded with notable weed infestation in several places.
- At a landscape scale the loss of the trees would contribute to environmental amenity loss and diminish ecological habitat value, which is obviously a concern, particularly clearance into the adjoining Mount George Conservation Park.
- Post development, what steps or measures are going to be taken to ensure the clearances are to specified standard? Is there a level of subsequent monitoring and evaluation? The Mount Lofty Golf Estate road reserve offers a level of scrutiny with blackberry clearly evident in several places.
- With a development complete, long-term changes in the environment are often found in the edge effect clearances. Council has specific concerns around any weed incursion into the cleared zones adjacent Mount George.
- Whilst the native vegetation offset is noted. What portion of this fund is attributed to the long-term ecological management of the surrounding natural environment? This is in addition to any NRM Levy payment.
- Golflinks Road has a potential listing under the Native Vegetation Marker System (NVMS), based on the Candle barks present. Currently this is heavily dependent on controlling the Blackberry along this road reserve which from observation occurs from within the Mount Lofty Golf Estate property.

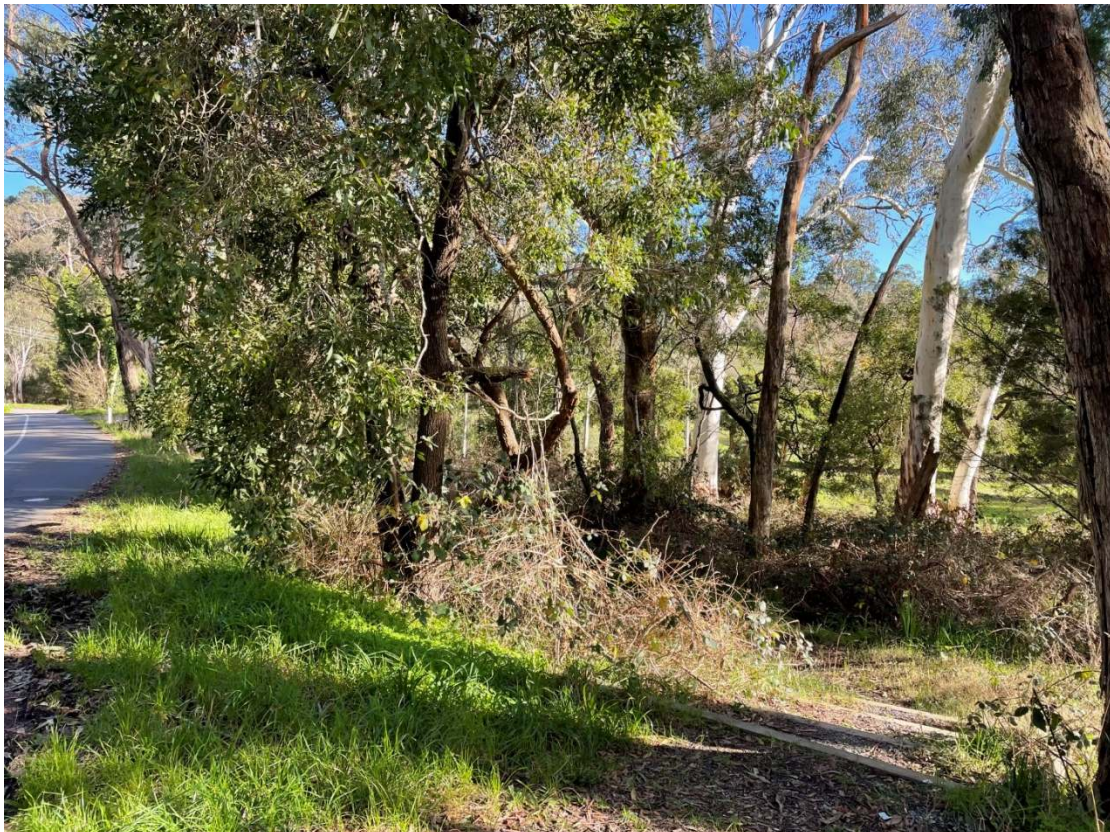
6.1.2 Recommendations:

The following recommendation have been proposed by Council's Open Space Team. These recommendations have also been adopted into recommended conditions:

- Council requires that a suitably qualified project arborist must be employed by the applicant to oversee the development activities throughout the duration of the project and to provided periodical reports to Council's development assessment team regarding compliance checks undertaken after installation of tree protection zones prior to commencement of any work, during demolition and bulk earthworks, driveway construction, construction of footings, superstructure , installation of underground services and at completion.
- Council requires that all tree protection zone guidelines are enforced as per the recommendations of the report.
- Consideration should also be given, and advice received regarding the impacts to neighbouring vegetation directly surrounding the areas of mass tree clearance.
- Council requests for applicant to demonstrate through the provision of an Arboriculture impact assessment report that the location of supporting infrastructure has been established with intent to minimise impacts to vegetation to the lowest possible level.
- Tree management advice should be provided around the following new or modified assets to ensure the placement and installation methods used do not adversely impact upon tree health or compromise tree sustainability through the development actions:
 - All buildings / Structures / outbuildings
 - Upgraded or new roadways
 - Upgraded or new walking paths
 - New fencing locations
 - Other supporting infrastructure (such as light poles)
 - Vehicle road reserve cross-overs locations
 - Main service provision of underground infrastructure to the buildings

- Underground service provision in between all accommodation and supporting infrastructure required as part of this development
- The road reserve and primarily the Mount Lofty Golf Estate boundary has several weeds species (in large numbers), clearly visible mainly Blackberry, Gorse, Ivy and Broom. The real concern is the land to be cleared along the perimeter, Mount George Conservation Park in particular. In time this boundary is likely to reflect the scenario already in place along the Council property. Council considers that this should be recorded and the fence line is inspected for several years post development ensuring weed incursion is controlled. Otherwise, the weed and ecological risk to surrounding properties from the Mount Lofty Golf Estate could be a future problem based on the evidence. Council considers that this requires a long-term bond with a management plan and reporting.











6.2 Trails:

Council advises that the Pioneer Women's trail and Heysen trail bisect the site using the Davenport Road reserve. Upon inspection it is evident that these trails use the corridor and as such should remain untouched as part of the development. However, if they were to be altered, then consultation with Council and the community groups that plan these trails (National Trust of SA and Friends of Heysen Trail, respectively) should be undertaken.

From traffic management and information provided demonstrates management within the site, and briefly describe access required from local roads and the impact this may have. Consideration must be given to the opportunities that exist in providing safer pedestrian access to and from the site for people moving from the south and the north via the local road networks. Should any work outside of the site be proposed that impacts Golflinks or Old Carey Gully Road a shared path should be considered to allow for safe and unrestricted shared travel for pedestrians and cyclists wishing to use the site. Alternatively, the developer may consider the use of their land for community access (shared use path) should road widening not allow for additional pedestrian/cycle infrastructure. This will also benefit the broader trail linkages that exist within the locality – existing local trails, the Heysen, Pioneer Women's and connection to Mount George Conservation Park.

6.3 Community Wastewater Management System (CWMS):

Council's current CWMS pump station located at Golflinks Rd, Stirling will need to be upgraded to accommodate the wastewater produced by the Mount Lofty Golf Estate development. The works to upgrade the station will need to include the following:

- Installation of a balance tank is on the subject site for collection of waste-water before entering Councils CWMS pump station. This will ensure that the wastewater enters in a controlled manner.
- Upgrade of pump capacity.
- Emergency storage capacity to increase.
- Back up diesel generator in case of power failure.
- Any trade waste generated will need to be managed onsite before entry into CWMS infrastructure.

The developer is also advised that they will need to seek approval from SA Water to dispose of the extra wastewater generated by the development into the Heathfield WWTP and will be responsible for all augmentation costs.

As a different approach, it is also advised for the developer to consider an alternate wastewater disposal method such as an indirect SA Water sewer connection from the proposed development along Old Carey Gully Rd to the SA Water Heathfield WWTP. There is an existing SA Water pressure sewer line that connects Woodhouse on Spring Gully Rd to the Heathfield WWTP.



6.4 Economic Development/Community Capacity:

Council understands that Economic Impact was a requirement of the Guidelines developed for this development. This analysis was undertaken by BDO who have the experience and expertise to undertake the economic impact analysis.

While the purpose of economic impact analysis is to quantify and describe the pertinent impacts such as the number of jobs or the amount of income generated, they do not in themselves indicate the magnitude of the benefits and costs and whether the project is desirable from a public viewpoint. In fact, even a negative event such as a bushfire will provide a positive economic impact using the approach taken in this assessment. Economic impact analysis is therefore an attempt to predict, but not evaluate the full effects of the project.

It is therefore considered that a Benefit Cost Analysis would have provided a far more systematic assessment of the development where every potential cost and benefit associated with a project would have been considered and even the less-than-obvious factors like indirect or intangible costs be uncovered. For example, as mentioned elsewhere, Council considers that there are significant native vegetation impacts associated with this development. A Benefit Cost Analysis would have enabled these impacts to be costed and compared with the expected benefits of the development.

Consistent with Treasurer's Instructions 17, Council encourages the State Planning Commission to seriously consider this approach for future Major Development assessments.

6.5 Local Heritage:

Council's Local Heritage advisory reviewed the proposal and consider the direct works to the local heritage place (LHP) and the design of the new five storey buildings. The comments are summarised below:

6.5.1 Works to a local heritage listed places:

Generally, the proposed works are supported, as they will see the refurbishment of the heritage building, and removal of non-significant later additions to the stone structure. The following aspects of the proposed works to the LHP should be reviewed and amended:

- Existing stone walls should NOT be sandblasted, this will damage the stone and mortar. If the walls require cleaning this should be done with low pressure water and stiff bristle brush. Organic growth can be removed with a weak biocide, applied and removed in accordance with the supplier's recommendations, and paint can be stripped with a chemical stripper such as 'Peelaway'.
- A moisture barrier should be provided between the stone walls and the new polished concrete floor internally.
- The roof can be replaced in either a red Colorbond to reference the original roof colour; alternately a galvanised sheet metal would be an appropriate material.

The proposed steel and glazed doors to the main entry to the proposed gift shop are acceptable to provide some visual connection with the inside of the building, however it would be preferred if all other doors and windows are retained as timber framed glazed windows, which better reflects the construction methodology of the original building.

The proposed redesign for the grounds of the heritage place includes a new modern glass, sandstone and metal building situated adjacent to the local heritage place. This is a contemporary design and is located at some distance from the LHP. No heritage issues with the proposed new building and associated landscape and paving works, however it is recommended the black roof be substituted for a lighter colour, as typically black or very dark roofs are not supported in a heritage context.

6.5.2 Comment on design of new facilities:

Whilst located at some distance from the Local Heritage Place, we provide the following comments on the design of the main structures proposed as part of the development:

- The Hotel and Facilities Buildings are located well within the golf club site, and will not be highly visible from adjacent roads.
- The scale of the development is extensive, with the both the Facilities and Hotel Buildings rising to 5 storeys from ground, albeit cut into the slope of the ground so that they primarily read as 3 to 4 storeys.
- The form of the buildings is also very contemporary, with flat roofs, strong vertical and horizontal articulation of building materials, and curved corners.
- Car parking appears to be largely contained within the building footprints, which is contributing to the scale of the buildings.
- The proposed material palette appears very stark, with concrete, metal cladding and glass in dark and grey tones – this could potentially be reviewed to better reflect the natural setting of the surrounding area.

6.6 Community & Cultural Development:

- Developer needs to be aware of their obligations under the Aboriginal Heritage Act whilst undertaking development works. Council is satisfied that this has been thoroughly addressed in the Cultural Heritage Management Plan provided as part of the submission documents.
- Council considers that there is an opportunity to recognise First Nations and add value to the visitor experience.
- Council considers that there is opportunity to engage with Adelaide Hills artists through the gallery/café.

6.7 Engineering Department:

Adelaide Hills Council was consulted at the start of the year by The Department for Trade and Investment - Planning and Land Use Services to provide preliminary comments on the draft Development Report and the level of information that was provided. At that time Council's Engineer Department provided clear feedback raising concerns, queries, and comments in relation to the proposal and the level of information. At that time, it was expected that this feedback would be considered by the applicant and addressed in the finalised submission. However, after reviewing the finalised documents as part of the formal referral process, Council's Engineer Department have advised that the original comments provided have not been addressed at all and as such are reiterating the same comments as originally provided. Additionally, given that the original comments have not been addressed, Council is of the opinion that it has not been afforded the opportunity to provide clear and most accurate feedback on the proposal and therefore reaffirms its concerns.

Accordingly, the following comments were provided:

- Applicant proposes some upgrades to Golflinks Rd, but does not provide detail of what is proposed.
- Applicant claims increase in operational traffic on Golflinks Rd is within acceptable levels, but doesn't clearly articulate what is considered acceptable for Golflinks Rd specifically.
- Applicant's updated traffic report details acceptable level of service for traffic volumes at key intersections, but does not address pavement strength or road geometry and their ability to cope with the increase in large and heavy vehicles accessing the site.
- Applicant proposes additional formal accesses off Golflinks and Carey Gully Rd, but does not provide detail of what is proposed at those locations.
- Applicant proposes to manage the majority of waste water onsite, and acknowledges that some 'augmentation' (upgrade) of the Golflinks Rd pump station may be required, the details of which are yet to be confirmed.

Council considers Golflinks Rd to be a minor local, low volume road, constructed and maintained at a standard appropriate for the rural living zone it is located in. It is not suitable to service a major commercial development of this nature. The developer needs to upgrade Golflinks Rd to meet an appropriate standard for an urban road, which would include at a minimum road widening and edge treatment. The design and construction of this upgrade must be undertaken to Council's satisfaction, and an Infrastructure Agreement including bond needs to be entered into. The developer's Arboriculture Pre Development Impact Assessment Report needs to be extended to cover roadside vegetation impacted by the road upgrade to ensure development generated by road construction does not adversely impact tree health or sustainability. These concerns also relate to the intersection of Golflinks Rd and Old Carey Gully Rd and the required upgrades in this location.

Council would like to advise that it supports the use of access from Old Carey Gully Road during the construction process. Additionally, the measures implemented to improve water quality and water course health is positive and would support Council's Aldgate, Bridgewater, Crafers and Stirling Stormwater Management Plan.

Council would also like to reaffirm that it is not satisfied with the level of information provided. Additionally, the developer is advised that Council will not approve any works on Council owned land or to Council owned infrastructure without first receiving appropriate details which are to Councils satisfaction.

6.8 Sports and Recreation:

- Golf is an important recreational activity in the Adelaide Hills region, & Council is therefore supportive of improvements proposed from a recreational perspective that will improve the quality & accessibility of the activity.
- Refurbishments to changerooms, (that we assume will provide, more accessible and equitable provision) are a welcome addition.
- Space for the community to gather is also an important consideration, so we are pleased to see that refurbishments to the clubhouse have also been included.

7. CONCLUSION

Council is aware of the positive economic impact such a development would have on the region and are supportive of such a proposal in principle. The upgrade of this facility is welcomed and will provide much needed recreation and accommodation options in the region.

Despite the benefits of such a proposal, Council is concerned of the lack of clarity supplied in the assessment documents. Further details allowing Council staff to review matters including but not limited to road upgrades, waste management and biodiversity impact would have been beneficial in order for staff to provide more informed comments.

In particular, Golflinks Road is currently a minor local road which is suited to the current intensity of the golf course. Council hold substantial concerns regarding increased traffic flows on Golflinks Road and hold the view that significant upgrades are required to this road should the development proceed. Upgrades to this road need to be reviewed including impacts that a road upgrade will have to vegetation on the road verge and impacts to Community Wastewater Management System infrastructure.

The extent of vegetation removal, details of off-site public road upgrades, waste management and impact upon the existing Community Wastewater Management System are serious concerns that require further investigation.

Should the application be successful, Council invites further discussion with the applicant in order to resolve the infrastructure issues that this proposal presents.

8. RECOMMENDED CONDITIONS

Should this development be granted consent, the Council Assessment Panel recommends the following conditions:

- 1) Site work and building work shall be carried out only between the hours of 7.00am to 5.00pm Monday to Saturday. No works are permitted on Sundays other than those necessary for dust control, emergency works or works that cannot be carried out at any other time without causing unnecessary disruption, as may be approved by Council on written application as per EPA requirements for work of this nature.**
- 2) Prior to Building Consent being issued, a Construction Environment Management Plan (CEMP) including a Soil, Erosion and Drainage Management Plan (SEDMP) must be prepared and submitted to Council with the civil design drawings submission for Council approval. The CEMP and SEDMP shall be implemented prior to construction commencing to prevent soil sediment and pollutants leaving the site or entering watercourses during development of the site. The CEMP should also include details of underground service connections on site and within road reserves.**

NOTE: The EPA Guideline Construction environmental management plans (CEMP) and Code of Practice for the building and construction industry provides useful information on the preparation of CEMPs and SEDMPs.

- 3) As-built" drawings of the approved and installed infrastructure shall be submitted to the Council along with certification from a professional engineer that the works for that stage have been completed in accordance with the approved design.**

- 4) All trenches or excavation are to be reinstated to the satisfaction of Council. All excavation, trenching of underground services and reinstatement in existing road pavements and verge areas shall be done to satisfaction of Council.
- 5) All approved works and infrastructure required for construction shall be constructed for the relevant stage to the satisfaction of the Council. All costs for the construction of all approved infrastructure shall be borne by the owner/applicant. Following agreement by Council that Practical Completion has been achieved the developer shall be responsible for all maintenance for a period of 12 months or such other period of time as agreed.
- 6) An asset register of the infrastructure constructed on Council land shall be provided in digital format to the satisfaction of Council.
- 7) Any costs associated with any vegetation clearance within Council Land including costs associated with Native Vegetation Significant Environmental Benefit payments is to be the responsibility of the applicant.
- 8) Proposed new (or modifications to existing) vehicle driveway connection points to Golflinks Rd and Old Carey Gully Road needs to be designed and constructed to meet relevant Australian Standards and to Council's satisfaction. The design needs to be approved by Council before any construction at the site is permitted to occur (NB especially as one proposed connection seems unlikely to meet relevant standards for sight distance).
- 9) The applicant shall provide an expanded Arboriculture Pre-development Impact Assessment report detailing tree management advice for any tree including impacted trees within the road verg (outside of the provided reports geographical area of scope) that could be impacted directly or indirectly by this development. Tree management advice should be provided around the following new or modified assets:

All buildings / Structures / outbuildings, upgraded or new roadways, upgraded or new walking paths, new fencing locations, other supporting infrastructure (such as light poles), vehicle road reserve cross-overs locations, main service provision of underground infrastructure to the buildings and underground service provision in between all dwellings and supporting infrastructure required as part of this development.
- 10) Prior to any civil works or earthworks commencing on-site, tree protection zone (TPZ) measure shall be implemented in accordance with the recommendations stipulated in the Arboricultural Impact Assessment and Development Impact Report prepared by Arborman Tree Solutions. The works in relation to the tree(s), outlined in the Arborist's Report are to be undertaken simultaneously with any building works on the site.
- 11) All works are required to be supervised by the suitably qualified project arborist throughout the duration of the project. If any tree roots are discovered during the works, the project arborist is to assess and address accordingly.

NOTE MANDATORY NOTIFICATION: Provide at least 48hours notice for Council to be present at excavation in tree protection zones of any Council owned trees.

- 12) The vegetation along the fence line of the Mount Lofty Golf Estate and in particular along Mount George shall be recorded and inspected for at least 3 years post development ensuring weed incursion is controlled. A long-term bond with a management plan and reporting shall be undertaken.**
- 13) Council shall be provided with reporting updates at each stage of construction.**
- 14) Existing stone walls of the Local Heritage Place should NOT be sandblasted, this will damage the stone and mortar. If the walls require cleaning this should be done with low pressure water and stiff bristle brush. Organic growth can be removed with a weak biocide, applied and removed in accordance with the supplier's recommendations, and paint can be stripped with a chemical stripper such as 'Peelaway'.**
- 15) In regards to the Local Heritage Place, a moisture barrier should be provided between the stone walls and the new polished concrete floor internally.**
- 16) The roof of the Local Heritage Place shall be replaced in either a red Colorbond to reference the original roof colour; or alternately galvanised sheet metal.**

9. ATTACHMENTS

Locality Plan
Development Report
Development Report Guidelines
Detail Survey
Plan of Sub Division
Architectural Drawings
Landscape Plan
Economic Analysis
Tree Impact Assessment
Sustainability Strategy Report
Traffic and Access Impact Statement
Waste Management and Minimisation Plan
Geotechnical Investigations
Design Statement
Environmental Heritage Impact Assessment Report
Cultural Heritage Management Plan Framework
Ecological Flora and Fauna Assessment
Hazard Management Plan
Bushfire Survival Plan
Environmental Noise Assessment Report
Services Infrastructure Summary
Construction Environmental Management Plan
Stormwater Management Plan
Bushfire Attack Level (BAL) Assessment
Letters of Support
Operational Environment Management Plan

Bushfire Management Strategy
Native Vegetation Clearance Data Report
Renders of the Proposed Development
Heritage Impact Statement
Certificate of Title
Integrated Water Management Plan
Perfumery Landscape Plans
Perfumery Detail Survey
Local Heritage Comments

Respectfully submitted

Concurrence

James Booker
Team Leader Statutory Planner

Deryn Atkinson
Assessment Manager