



NOTICE

of

COUNCIL ASSESSMENT PANEL MEETING

Pursuant to the provisions of Section 82 of the Planning, Development and Infrastructure Act 2016

TO BE HELD IN

**COUNCIL CHAMBERS
PLAYFORD CIVIC CENTRE
10 PLAYFORD BOULEVARD, ELIZABETH**

MEMBERS MAY PARTICIPATE BY ELECTRONIC MEANS

ON

THURSDAY, 18 SEPTEMBER 2025 AT 6:00 PM

THIS MEETING WILL ALSO BE VIEWABLE AT
<https://www.youtube.com/user/CityOfPlayford>

A handwritten signature in black ink, appearing to read "Matt Dineen".

**MATT DINEEN
SENIOR MANAGER DEVELOPMENT SERVICES**

Issue Date: Thursday, 11 September 2025

MEMBERSHIP

MR GEOFF PARSONS – PRESIDING MEMBER

Mr Aaron Curtis

Ms Cherie Gill (Deputy)

Mr Paul Mickan

Ms Misty Norris

Ms Tanya Smiljanic (Deputy)

Mr Adam Squires

**City of Playford
Council Assessment Panel Meeting**

AGENDA

THURSDAY, 18 SEPTEMBER 2025 AT 6:00 PM

ACKNOWLEDGEMENT OF COUNTRY

We would like to acknowledge that this land we meet on today is the traditional land of the Kaurna people, and that we respect their spiritual relationship with their country. The City of Playford would also like to pay respects to Elders past, present and emerging.

1 ATTENDANCE RECORD

1.1 Present

1.2 Apologies

Mr Paul Mickan

1.3 Not Present

2 CONFIRMATION OF MINUTES

RECOMMENDATION

The Minutes of the Council Assessment Panel Meeting held 21 August 2025 be confirmed as a true and accurate record of proceedings.

3 APPLICATIONS WITHDRAWN

4 DECLARATIONS OF INTEREST

5 APPLICATIONS FOR CONSIDERATION – PERSONS WISHING TO BE HEARD

Nil

6 APPLICATIONS FOR CONSIDERATION – NO PERSONS TO BE HEARD

6.1 25027178 - Allotment 144 John Rice Avenue, Elizabeth South - Variation to
24022584 - Land Division (1 into 4) and Tree Damaging Activity (Attachments)6

Representors: N/A

Applicant: City of Playford

- 6.2 25005488: 17 Stebonheath Rd, Edinburgh North - Child care facility with associated car parking, landscaping and illuminated signage including a pylon sign to 4.6m height (Attachments).....47

Representors: Nil
Applicant: Leyton Property Pty Ltd

7 APPLICATIONS FOR CONSIDERATION - CATEGORY 1

Nil

8 OUTSTANDING MATTERS – APPEALS AND DEFERRED ITEMS

Nil

9 OTHER BUSINESS

9.1 STAFF REPORTS

Nil

10 CONFIDENTIAL MATTERS

OUTSTANDING MATTERS – APPEALS AND DEFERRED ITEMS

- 10.1 Warehouse and light industry development with advertisement and associated detention basin, car parking, landscaping and regulated and significant tree removals (Attachments)168

Representors: Nil
Applicant: Zuppa Group c/ Future Urban

11 POLICY DISCUSSION FORUM

Nil

12 CLOSURE

APPLICATIONS FOR CONSIDERATION

**APPLICATIONS FOR
CONSIDERATION – NO PERSONS
TO BE HEARD**

6.1 25027178 - ALLOTMENT 144 JOHN RICE AVENUE, ELIZABETH SOUTH - VARIATION TO 24022584 - LAND DIVISION (1 INTO 4) AND TREE DAMAGING ACTIVITY

Author:	Andrew Humby, Consultant Planner
Proposal:	Variation to DA 24022584 comprising changes to Land Division Consent Conditions 2 - 4
Development Number:	25027178
Date of Lodgement:	2 September 2025
Owner:	City of Playford
Applicant:	City of Playford c/- Future Urban
Location:	Allotment 144 John Rice Avenue, Elizabeth South
Zone:	Strategic Innovation Zone, Activity Node Sub Zone
Classification:	Performance Assessed
Public Notification Category:	No
Representation Received:	N/A
Request for Additional Information Made?	No
Recommendation:	To Grant Planning Consent
Attachments:	<div><div>1 ↓ Application Documents</div><div>2 ↓ 20 February 2025 - Council Assessment Panel - Meeting Minutes</div><div>3 ↓ 20 February 2025 - Council Assessment Panel - Report</div></div>

1. The Subject Land

The subject land is identified as Allotment 144 of Filed Plan 130753 within Certificate of Title Volume 6203 Folio 773.

The subject land is located on the north-eastern corner of the intersection of John Rice Avenue and Philip Highway. The subject land contains covers an area of approximately 3 hectares and contains frontages to John Rice Avenue, Philip Highway, Mark Road and Coglin Road.

John Rice Avenue and Philip Highway are both classified as State maintained roads and are managed by the Department for Infrastructure and Transport (DIT). The subject land is currently undeveloped, with no buildings or structures present. The land is however covered with extensive vegetation, including numerous Regulated and Significant Trees.

2. The Locality

The locality is characterised by a mix of land uses and large areas of vegetated open space, with the multi-lane road network (John Rice Avenue and Philip Highway) and notable barrier between differing land uses.

A notable feature to the west of Philip Highway is the former Holden site and a more recently constructed petrol filling station on the intersection of Philip Highway and John Rice Avenue.

To the immediate south is a wide-open space reserve abutting John Rice Avenue, with residential allotments, located within the General Neighbourhood Zone, of a consistent size and configuration located further to the south. The General Neighbourhood Zone extends north of John Rice Avenue to include a triangular section that adjoins the subject land to its east.

The ACH Healthia Aged Care and Retirement Living Complex is located to the north of the subject land. Orientated towards Mark Road, the built form comprises of single-storey independent living dwellings and a two-storey main building setback from the street behind visitor car parking.

To the north of the subject land, a mix of land uses are located within the Employment Zone, including a place of worship, equipment hire depot (service trade premise), transport logistics, recycling depot and other light industrial activities.

2.1 Locality Plan



2.2 Zoning

The subject land is located within the Strategic Innovation Zone (the Zone) and Activity Node Subzone (the Subzone) as identified in the *Planning and Design Code* (the Code).

The following Overlays and Technical and Numerical Variations (TNVs) also apply.

Overlays:

- Airport Building Heights (Regulated) Overlay – All structures over 45 metres

- Affordable Housing Overlay
- Building Near Airfields Overlay
- Defence Aviation Area Overlay – All structures over 90 metres
- Hazards (Flooding – General) Overlay
- Noise and Air Emissions Overlay
- Prescribed Wells Area Overlay
- Regulated and Significant Tree Overlay
- Traffic Generating Development Overlay
- Urban Transport Routes Overlay.

TNVs:

- Concept Plan 81 – Edinburgh Defence Airfield Lighting Constraints
- Interface Height.

3. Background

The Council Assessment Panel (CAP) at its meeting of 20 February 2025 resolved to grant planning and land division consent for land division (1 allotment into 4) and tree damaging activity at Allotment 144 John Rice Avenue, Elizabeth South subject to a reserved matter and number of conditions (DA 24022584).

See Attachment 2 and 3 for Agenda Report and Minutes (for full agenda item, please review full agenda on the CAP page – <http://www.playford.sa.gov.au/council/council-and-committees/current-committees/council-assessment-panel>).

Council staff have considered this variation request and resolved that the variation is not minor and is to be assessed as a variation to the original application.

Separate to this approval, Council has entered into a number of contracts with various private entities to develop the subject land in a manner to achieve the outcomes of the 'Playford Health & Wellbeing Precinct Master Plan'.

4. The Proposal

The Applicant is seeking a variation to Land Division Conditions 2, 3, and 4 of Development Application DA 24022584. Conditions further discussed in Section 7.1.

It is proposed that these conditions, which relate to the design and construction of access points, creation of easements and the installation of essential services, be amended to allow the CAP to accept a legally binding agreement in lieu of physical completion prior to clearance.

This amendment would enable clearance to be issued under Section 138 of the *Planning, Development and Infrastructure Act 2016* (the PDI Act), based on a legally enforceable commitment rather than the completed delivery of easements and associated infrastructure.

The legally binding agreement may take the form of either existing sales contracts or a formal agreement with a third party that commits to the provision of the required access infrastructure and services.

5. Procedural Matters

5.1 Classification

Section 128 of the PDI Act establishes that a person may seek the variation of a development authorisation, including variations to conditions of approval.

A variation application may only be made if the relevant authorisation is still operative and cannot be used to extend the period for which the authorisation remains operative.

As Planning and Land Division Consent was granted on 25 February 2025, the authorisation is operative until 25 February 2028 (3 years). Until this time, the Applicant is entitled to seek approval of a variation request.

The variation proposal has been assessed using the Performance Assessment pathway in accordance with Section 106 of the PDI Act.

5.2 Public Notification

Under Section 107(6) of the PDI Act, all classes of performance assessed development require public notification unless excluded by Table 5 of the Procedural Matters Section of the relevant Zone of the Code.

Table 5 of the Zone identifies development types excluded from public notification. In this instance, 'Land Division' is listed as an exempt form of development and therefore does not require public notification.

5.3 Statutory Referrals

Given the variation only impacts conditions imposed by the CAP, no statutory referral comments were received for the proposed variation.

6. Key Issues

The following matter is considered pertinent in reaching a recommendation for the proposal:

- Whether the proposed variation provides sufficient certainty regarding the delivery of infrastructure and services.

7. Planning Assessment

7.1 Infrastructure

The provision of infrastructure was a key consideration during the CAPs original assessment of the land division at its meeting on 20 February 2025.

As a result, three (3) land division consent conditions were imposed:

Condition 2:

Prior to clearance under Section 138 of the Act access points shall be installed on John Rice Avenue, Phillip Highway and Coglin Road at Rights of Way identified as 'B' and 'C' in accordance with the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24. The works shall be designed and constructed in accordance with recognised engineering practice and shall be to the satisfaction of the Council.

Condition 3:

Prior to clearance under Section 138 of the Act all necessary electrical supply, water supply and sewerage services shall be installed on the land in accordance with recognised engineering practice and shall be to the satisfaction of the Council.

Condition 4:

Prior to clearance under Section 138 of the Act adequate provision shall be made for the creation of appropriate easements for the purposes of access, drainage, electricity supply, water supply and sewerage services as reflected in the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24.

The Applicant now seeks for the variation to conditions 2, 3 and 4. The proposed variation would allow for the option that prior to clearance under Section 138 of the PDI Act either:

- The works for all conditions have been undertaken and completed in accordance with the identified plans or in accordance with engineering practices;
- or
- A legally binding agreement has been executed for the completion of these works.

As outlined, these conditions relate to the physical delivery of access points, services, and easements prior to Section 138 clearance. The variation proposes that the CAP could instead accept a legally binding agreement, which may take the form of an existing sales contract or third-party agreement committing to infrastructure delivery.

In this case, existing sales contracts between Council and purchasers include binding obligations for Council to undertake and complete infrastructure works. These works include internal access roads and the provision of water, sewer, and electricity services:

- Lots 1 and 2: Infrastructure will be delivered by SA Health and DIT, as part of the construction of the Drug and Alcohol Services South Australia (DASSA) facility proposed for Lot 2.
- Lots 3 and 4: A sales contract has been executed with the future landowners. The CAP granted planning consent for a childcare centre on Lot 4 on 17 July 2025. This contract similarly commits to infrastructure delivery.

These contractual arrangements provide a clear and enforceable mechanism for ensuring infrastructure is delivered as required, supporting the proposed variation to the original conditions.

Council's City Property staff have requested the opportunity to appear before the CAP to discuss the specific details of the sales contracts. Given the commercial-in-confidence

nature of these agreements, it is recommended that this discussion be held under the CAP's confidentiality provisions.

It is expected that these discussions will provide further detail on the binding arrangements in place and reinforce the level of certainty regarding the timely provision of easements and associated infrastructure.

Please find the below proposed changes in wording for conditions 2 and 3 (highlighted below). No further change to condition 4 is recommended and is discussed further below:

Condition 2

*Prior to clearance under Section 138 of the Act access points shall be installed, **or a legally binding agreement has been executed for works to be completed**, on John Rice Avenue, Phillip Highway and Coglin Road at Rights of Way identified as 'B' and 'C' in accordance with the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24. The works shall be designed and constructed in accordance with recognised engineering practice and shall be to the satisfaction of the Council.*

Condition 3

*Prior to clearance under Section 138 of the Act **all necessary electrical supply, water supply and sewerage services shall be installed, or a legally binding agreement has been executed for works to be completed**, on the land in accordance with recognised engineering practice and shall be to the satisfaction of the Council.*

Condition 4 – amendment not required

Prior to clearance under Section 138 of the Act adequate provision, shall be made for the creation of appropriate easements for the purposes of access, drainage, electricity supply, water supply and sewerage services as reflected in the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24.

This condition requires that, prior to clearance, adequate provision is made for the creation of appropriate easements for access, drainage, electricity supply, water supply and sewerage services. It is considered that no amendment to this condition is necessary, as the requirement for adequate provision is already addressed in the approved plan of division.

Notwithstanding this, an overhead powerline currently traverses through proposed Allotment 1, outside of any proposed future easements. As part of the proposed land division, provisions have been made for this powerline to be relocated underground (with the associated easement provided), and this work would ordinarily have been required to occur prior to clearance. However, the overhead powerline may remain following clearance under Section 138 of the PDI Act (refer to allowance in the proposed amendment to condition 3).

Given the proposed variation, it is recommended that an easement for the overhead powerlines be retained as part of this variation. The Applicant has been made aware of this requirement and amended plans will be forthcoming. This matter may be addressed by the CAP through an amendment to the condition once the amended plans are received, or alternatively as a reserved matter

8. Conclusion

The City of Playford (c/- Future Urban) seeks Planning and Land Division Consent to vary conditions 2 and 3 of Development Application 24022584.

The variation proposes amendments of these conditions allowing the CAP to rely on binding agreements in lieu of physical completion of infrastructure prior to issuing Section 138 clearance under the PDI Act.

The variation is supported by existing contracts that provide legally enforceable commitments to deliver the required infrastructure and services. These arrangements, in the view of Council staff, provide sufficient certainty that infrastructure will be delivered appropriately.

On balance, the proposed variation is not considered to be seriously at variance with the relevant provisions of the Code. Instead, the binding arrangements proposed as an alternative continue to satisfy the key policy objectives of the Zone and the Subzone and broader infrastructure provisions.

It is therefore recommended that varied Planning and Land Division Consent be granted, subject to the Reserved Matters and Conditions outlined below.

9. Recommendation

STAFF RECOMMENDATION

It is therefore recommended that the Council Assessment Panel:

1. DETERMINES that the proposed Variation is not seriously at variance with the provisions of the *Planning and Design Code*
2. GRANTS Planning and Land Division Consent of Development Application 25027178 to amend Development Application ID. 24022584 and retention of the following Reserved Matters and Conditions:

Reserved Matters:

Pursuant to Section 102(3) of the *Planning, Development and Infrastructure Act 2016* (the PDI Act), the following matters shall be reserved for further assessment to the satisfaction of the Council Assessment Panel, and sub-delegated to the Assessment Manager, for determination prior to the granting of Development Approval:

1. The Applicant shall submit an updated Plan of Division which has an amended Right of Way 'B' to facilitate the augmentation of access in Allotment 1 and 2 prepared in consultation with the Department for Infrastructure and Transport.

Conditions:

Planning Consent

1. The development must be undertaken, completed and maintained in accordance with the plan(s) and information detailed in this Application except where varied by any condition(s) listed below.
2. All regulated and significant trees not authorised under this consent for removal and impacted via Tree Protection Zone (TPZ) encroachments, must ensure protection measures are undertaken in line with the Tree Protection measures listed within the submitted Arborist Report. Further to this, to ensure all trees remain viable post development, any TPZ encroachment over 10% must be undertaken utilising non-destructive methods of excavation (hydrovac, hand dig). Any roots over 30mm diameter that are found within the excavation areas and require removing will need to be recorded in location and photos taken, this information will need to be submitted to the City of Playford Arborist to ensure tree viability and safety of community.

Land Division Consent:

1. Payment of an amount calculated in accordance with the *Planning, Development and Infrastructure (Fees, Charges and Contributions) Regulations 2019* be made into the City of Playford Urban Tree Fund in lieu of planting replacement trees. Payment must be made prior to clearance under Section 138 of the PDI Act.
2. Prior to clearance under Section 138 of the PDI Act access points shall be installed, or a legally binding agreement has been executed for works to be completed, on John Rice Avenue, Philip Highway and Coglein Road at Rights of Way identified as 'B' and 'C' in accordance with the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24.

The works shall be designed and constructed in accordance with recognised engineering practice and shall be to the satisfaction of the Council.

3. Prior to clearance under Section 138 of the PDI Act all necessary electrical supply, water supply and sewerage services shall be installed, or a legally binding agreement has been executed for works to be completed, on the land in accordance with recognised engineering practice and shall be to the satisfaction of the Council.
4. Prior to clearance under Section 138 of the PDI Act adequate provision, shall be made for the creation of appropriate easements for the purposes of access, drainage, electricity supply, water supply and sewerage services as reflected in the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24.

Conditions imposed by South Australian Water Corporation under Section 122 of the PDI Act:

5. This development is within a current Augmentation Charge Area and SA Water Gazetted Augmentation charges shall be paid by the developer.
6. If a connection/s off an existing main is required, the connection/s to your development will be a standard or a non-standard cost. This will be determined by an investigation where appropriate.
7. SA Water has water/wastewater network assets within close proximity to the location of this development. An investigation, if required, will be undertaken following the provision of the development details to enable a servicing strategy to be provided. Augmentation infrastructure works may need to be undertaken by the Developer and/or SA Water to enable servicing of this development. SA Water may contribute to the cost of these works.

SA Water Gazetted Augmentation Charges, Connection and Extension fees and Capacity Upgrade fees and charges shall be paid by the developer.

SA Water may contribute to any material upsizing requirements.

Conditions imposed by State Planning Commission Planning Services under Section 122 of the PDI Act:

8. A final plan complying with the requirements for plans set out in the Manual of Survey Practice Volume 1 (Plan Presentation and Guidelines) issued by the Registrar General to be lodged with the State Planning Commission for Land Division Certificate purposes.
9. Payment of \$26,121.00 into the Planning and Development Fund (3 allotments at \$8707.00 per allotment). This payment will not become payable until the Certificate of Approval application under Section 138 has been lodged. At that time the Land Division Registration fee (currently \$1154.00), will also become payable. The total of the two fees must be paid in a single payment. Payment may be made via credit card (Visa or MasterCard) online at plan.sa.gov.au, over the phone on 7133 3028, or cheques may be made payable to the State Planning Commission, marked "Not Negotiable" and sent to GPO Box 1815, Adelaide 5001.

Conditions imposed by State Planning Commission Commissioner of Highways under Section 122 of the PDI Act:

10. Access to/from John Rice Avenue and Philip Highway shall be gained via suitably designed Rights of Way 'B' and 'C' as shown on Mosel Surveyors, Plan of Division, Reference A21008P1.8, Revision 1.8 dated 25/3/24. The access points shall be limited to left turn in and left turn out only.
11. Solid median shall be installed on John Rice Avenue at Rights of Way 'B' and 'C' to physically restrict movements to left in and left out only. These treatments shall be designed to cater for the largest vehicles expected to access the site and allow for B-Double (26.0m length) movements along John Rice Avenue. A channelised left turn (AUL) shall also be installed at Right of Way 'B'. To accommodate these works the northern kerb line of John Rice Avenue shall be suitably widened. The road works shall be undertaken as shown on Frank Siow & Associates, Concept Plan, Drawing No. PL-241219, sheets 1, 2 and 3 in correspondence dated 19 December 2024 and to DIT satisfaction.

The works shall be designed and constructed in accordance with the relevant Austroads Guides, Australian Standards and the DIT Master Specifications with all associated costs (including and not limited to project management and any necessary road lighting, signage and drainage upgrades) to be borne by the Applicant. All works shall be completed by 12 months following issuing of the titles.

Note: The Applicant shall contact Mr Narendra Patel, Senior Network Integrity Engineer, Network Management Services on telephone 08 7133 3208, mobile 0400 436 745 or via email: narendra.patel@sa.gov.au to progress this. The Applicant shall enter into a Developer Agreement with the DIT to undertake and complete this work.

12. Any land required from the subject site for the construction of the access roads, median treatments, left turn lanes, corner cut offs, corner radius, footpaths/pedestrian ramps, etc shall be dedicated to road at no cost to the DIT.
13. All vehicles shall enter and exit the site in a forward direction.
14. Any infrastructure within the road reserve (including stobie pole/s, street light/s, directional sign/s, etc) that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the Applicant.
15. All off-street parking and vehicle manoeuvring areas shall be designed in accordance with AS/NZS 2890.1:2004, AS/NZS 2890.6:2009 and AS2890.2:2018. Additionally, clear sightlines, as shown in Figure 3.3 'Minimum Sight Lines for Pedestrian Safety' in AS/NZS 2890.1:2004, shall be provided at the property line to ensure adequate visibility between vehicles leaving the site and pedestrians on the adjacent footpath.
16. A final stormwater management plan shall be developed in conjunction with the DIT. All drainage infrastructure is to be to the satisfaction of Council and the DIT.
17. Stormwater run-off shall be collected on-site and discharged without impacting the safety or integrity of John Rice Avenue, Philip Highway, Mark Road and Coglin Road. Any alterations to the road drainage infrastructure required to facilitate this shall be at the Applicant's expense.

Advisory Notes:

Advisory Notes imposed by State Planning Commission Planning Services under Section 122 of the PDI Act:

1. Under Part 20A of the *Telecommunications Act 1997 (Cth)*, developers are required to install fibre-ready facilities (e.g. pit and pipe) in their developments, unless the development qualifies for an exemption. Developers can face penalties if they sell or lease building lots or units in new developments without fibre-ready facilities installed.

Under the Commonwealth's Telecommunications in New Developments Policy, developers are also expected to contract a telecommunications carrier (being any statutory infrastructure provider (SIP) or NBN Co as the default SIP) to provide services in their development. Carriers should install fixed-line network infrastructure in new developments, unless that is not commercially feasible, in which case they should use fixed-wireless or satellite technologies.

Further details of these requirements can be found at:

www.infrastructure.gov.au/departments/media/publications/telecommunications-new-developments

Advisory Notes imposed by Commissioner of Highways under Section 122 of the PDI Act:

2. Any further increase in traffic generation associated with development of Lots 1, 3 and 4 will need to be supported by a comprehensive traffic and parking assessment.
3. The Applicant shall notify DIT's Traffic Management Centre (TMC) – Roadworks on 1800 434 058 or email dit.roadworks@sa.gov.au to gain approval for any road works, or the implementation of a traffic management plan during the construction and or utility provision, tree removal, etc for the subject development. Before any construction/roads works the contractor(s) shall complete a 'Notification of Works' form via the following link:

https://www.dit.sa.gov.au/contractor_documents/works_on_roads_by_other_organisations.

Christopher Webber

From: Edi Bergamin <EBergamin@playford.sa.gov.au>
Sent: Friday, 8 August 2025 5:44 PM
To: Leif Burdon; Andrew Humby
Cc: Matt Dineen; Paul Alberton; Michelle Parker; Joanne Cross
Subject: 250808_Lot 144 John Rice Ave - Application for DNF Variation for DA 24022584
Attachments: DecisionNotificationForm-Application24022584-10542152.pdf

Importance: High

Hello Leif, Andrew,

In reference to the attached Decision Notification Form for DA 24022584, I hereby submit an application for a variation to the following land division consent conditions 2-4 for consideration at the earliest CAP meeting;

Land Division Consent**Condition 1**

Payment of an amount calculated in accordance with the *Planning, Development and Infrastructure (Fees, Charges and Contributions) Regulations 2019* be made into the City of Playford Urban Tree Fund in lieu of planting replacement trees. Payment must be made prior to clearance under Section 138 of the Act.

Condition 2

Prior to clearance under Section 138 of the Act access points shall be installed on John Rice Avenue, Phillip Highway and Coglein Road at Rights of Way identified as 'B' and 'C' in accordance with the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24. The works shall be designed and constructed in accordance with recognised engineering practice and shall be to the satisfaction of the Council.

Condition 3

Prior to clearance under Section 138 of the Act all necessary electrical supply, water supply and sewerage services shall be installed on the land in accordance with recognised engineering practice and shall be to the satisfaction of the Council.

Condition 4

Prior to clearance under Section 138 of the Act adequate provision shall be made for the creation of appropriate easements for the purposes of access, drainage, electricity supply, water supply and sewerage services as reflected in the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24.

Variation request : As discussed previously, the requirement to design and construct the access points (Condition 2) and the installation of the services (Condition 3) should be amended to allow Council to accept a binding agreement as an alternative. As a consequence, issue clearance under Section 138 of the PDI Act.

The binding agreement could be the current sales contracts or an agreement with a third party committing to the construction of the access points and services. The current sales contracts between Council and the purchasers requires Council to deliver the infrastructure works which consists of the internal access roads and the services (water, sewer & electricity).

Whereas for Lot 1&2 , SA Health/DIT will construct the infrastructure works in conjunction with the construction of the DASSA building project for Lot 2

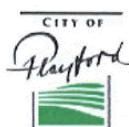
The current contract status of the four(4) allotments is summarised as follows;

Lot Number	Proponent	Contract status/description as of July 2025
1	None	Select Tender process in progress
2	SA Health	SA Health will acquire Lot 2 via compulsory acquisition for a proposed DASSA facility. SA Health/DIT will deliver the infrastructure works for lot 1&2. Agreement currently been drafted.
3	Dr Cugati	Sales contract executed
4	Sarah/Accord	Sales contract executed Planning Application approved at CAP meeting 17 July 2025 for Childcare Centre (Stage 1)

In summary, can you confirm the variation will be submitted for consideration by CAP and at which meeting.

If you require further information or clarification, please contact me.

Regards,



Edi Bergamin

Program Manager - Repurposing Assets

(08) 8256 0111

EBergamin@playford.sa.gov.au

12 Bishopstone Road, Davoren Park, SA 5113

playford.sa.gov.au



Don't forget to register
your pet before 31 August
dogsandcatsonline.com.au
Update your details here too!



We acknowledge that we work on Kurna Country and pay our respects to the Kurna people and their ongoing spiritual connection to country.



MINUTES

of

COUNCIL ASSESSMENT PANEL MEETING

Pursuant to the provisions of Section 82 of the Planning, Development and Infrastructure Act 2016

HELD IN

**COUNCIL CHAMBERS
PLAYFORD CIVIC CENTRE
10 PLAYFORD BOULEVARD, ELIZABETH**

ON

**THURSDAY, 20 FEBRUARY 2025
AT 6:00 PM**

The meeting commenced at 6:00pm.

1 ATTENDANCE RECORD

1.1 Present

MR GEOFF PARSONS – PRESIDING MEMBER

Mr Aaron Curtis
Mr Adam Squires

Mr Paul Mickan

Ms Misty Norris

Also in attendance for the meeting:

Assessment Manager
Manager Planning Services
Consultant Planner
Governance Support
ICT Support Officer
Minute Taker

Mr Matt Dineen
Mr Leif Burdon
Mr Andrew Humby
Ms Kiraly Gosnell
Ms Helen Pocius
Mrs Skye Nitschke

1.2 Apologies

Nil

1.3 Not Present

Nil

2 CONFIRMATION OF MINUTES

PANEL RESOLUTION

CAP573

The Minutes of the Council Assessment Panel Meeting held 19 December 2024 be confirmed as a true and accurate record of proceedings.

CARRIED

3 APPLICATIONS WITHDRAWN

Nil

4 DECLARATIONS OF INTEREST

Ms Norris declared a material conflict of interest in item 6.1 due to previous Council considerations on this matter and will withdraw from the meeting.

Cr Norris withdrew from the meeting at 6:04 pm in response to her declared conflict of interest.

5 APPLICATIONS FOR CONSIDERATION – PERSONS WISHING TO BE HEARD

Nil

6 APPLICATIONS FOR CONSIDERATION – NO PERSONS TO BE HEARD

6.1 24022584 - ALLOTMENT 144 JOHN RICE AVENUE, ELIZABETH SOUTH - LAND DIVISION (1 INTO 4) AND TREE DAMAGING ACTIVITY

Representors: N/A

Applicant: City of Playford c/- Future Urban

PANEL RESOLUTION

CAP574

It is therefore recommended that the Council Assessment Panel:

1. DETERMINES that the proposed development is not seriously at variance with the provisions of the Planning and Design Code.
2. GRANTS Planning and Land Division Consent to the application by the City of Playford C/- Future Urban for a Land Division (1 allotment into 4) and Tree Damaging Activity at Allotment 144 John Rice Avenue, Elizabeth South as detailed in Development Application ID. 24022584 subject to the following reserved matter conditions:

Reserved Matter

Pursuant to Section 102(3) of the *Planning, Development and Infrastructure Act 2016* (the Act), the following matter shall be reserved for further assessment to the satisfaction of the Council Assessment Panel, and sub-delegated to the Assessment Manager, for determination prior to the granting of Development Approval:

1. The applicant shall submit an updated Plan of Division which has an amended Right of Way B to facilitate the augmentation of access in lot 1 and 2 prepared in consultation with the Department of Infrastructure and Transport.

Planning Consent Conditions

1. The development must be undertaken, completed and maintained in accordance with the plan(s) and information detailed in this Application except where varied by any condition(s) listed below.
2. All regulated and significant trees not authorised under this consent for removal and impacted via TPZ encroachments, must ensure protection measures are undertaken in line with the Tree Protection measures listed within the submitted Arborist Report. Further to this, to ensure all trees remain viable post development, any TPZ encroachment over 10% must be undertaken utilising non-destructive methods of excavation (hydrovac, hand dig). Any roots over 30mm diameter that are found within the excavation areas and require removing will need to be recorded in location and photos taken, this information will need to be submitted to City of Playford Arborist to ensure tree viability and safety of community.

Land Division Consent Conditions

1. Payment of an amount calculated in accordance with the *Planning, Development and Infrastructure (Fees, Charges and Contributions) Regulations 2019* be made into the City of Playford Urban Tree Fund in lieu of planting replacement trees. Payment must be made prior to clearance under Section 138 of the Act.
2. Prior to clearance under Section 138 of the Act access points shall be installed on John Rice Avenue, Phillip Highway and Coglin Road at Rights of Way identified as 'B' and 'C' in accordance with the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24. The works shall be designed and constructed in accordance with recognised engineering practice and shall be to the satisfaction of the Council.
3. Prior to clearance under Section 138 of the Act all necessary electrical supply, water supply and sewerage services shall be installed on the land in accordance with recognised engineering practice and shall be to the satisfaction of the Council.

4. Prior to clearance under Section 138 of the Act adequate provision shall be made for the creation of appropriate easements for the purposes of access, drainage, electricity supply, water supply and sewerage services as reflected in the approved plan of division prepared by Mosel Surveyors, Ref. A21008P1.8, Revision 1.8 Dated 25/03/24.

Conditions imposed by South Australian Water Corporation under Section 122 of the Act

5. This development is within a current Augmentation Charge area and SA Water Gazetted Augmentation charges shall be paid by the developer.
6. If a connection/s off an existing main is required, the connection/s to your development will be a standard or a non-standard costs. This will be determined by an investigation where appropriate.
7. SA Water has water/wastewater network assets within close proximity to the location of this development.

An investigation, if required, will be undertaken following the provision of the development details to enable a servicing strategy to be provided. Augmentation infrastructure works may need to be undertaken by the Developer and/or SA Water to enable servicing of this development. SA Water may contribute to the cost of these works.

SA Water Gazetted Augmentation Charges, Connection and Extension Fees and Capacity Upgrade fees and charges shall be paid by the developer.

SA Water may contribute to any material upsizing requirements.

Conditions imposed by SPC Planning Services under Section 122 of the Act

8. A final plan complying with the requirements for plans set out in the Manual of Survey Practice Volume 1 (Plan Presentation and Guidelines) issued by the Registrar General to be lodged with the State Planning Commission for Land Division Certificate purposes.
9. Payment of \$26,121.00 into the Planning and Development Fund (3 allotment/s @ \$8707.00/allotment). This payment will not become payable until the Certificate of Approval application under Section 138 has been lodged. At that time the Land Division Registration fee (currently \$1154.00), will also become payable. The total of the two fees must be paid in a single payment. Payment may be made via credit card (Visa or MasterCard) online at plan.sa.gov.au, over the phone on 7133 3028, or cheques may be made payable to the State Planning Commission, marked "Not Negotiable" and sent to GPO Box 1815, Adelaide 5001.

Conditions imposed by Commissioner of Highways under Section 122 of the Act

10. Access to/from John Rice Avenue and Philip Highway shall be gained via suitably designed Rights of Way 'B' and 'C' as shown on Mosel Surveyors, Plan of Division, Reference A21008P1.8, Revision 1.8 dated 25/3/24. The access points shall be limited to left turn in and left turn out only.
11. Solid median shall be installed on John Rice Avenue at Rights of Way 'B' and 'C' to physically restrict movements to left in and left out only. These treatments shall be designed to cater for the largest vehicles expected to access the site and allow for B-Double (26.0m length) movements along John Rice Avenue. A channelised left turn (AUL) shall also be installed at Right of Way 'B'. To accommodate these works the northern kerb line of John Rice Avenue shall be suitably widened. The road works shall be undertaken as shown on Frank Siow & Associates, Concept Plan, Drawing No. PL-241219, sheets 1, 2 and 3 in correspondence dated 19 December 2024 and to DIT satisfaction.

The works shall be designed and constructed in accordance with the relevant Austroads Guides, Australian Standards and DIT Master Specifications with all associated costs (including and not limited to project management and any necessary road lighting, signage and drainage upgrades) to be borne by the applicant. All works shall be completed by 12 months following issuing of the titles.

Note: The applicant shall contact Mr Narendra Patel, Senior Network Integrity Engineer, Network Management Services on telephone 08 7133 3208, mobile 0400 436 745 or via email: narendra.patel@sa.gov.au to progress this. The applicant shall enter into a Developer Agreement with DIT to undertake and complete this work.

12. Any land required from the subject site for the construction of the access roads, median treatments, left turn lanes, corner cut offs, corner radius, footpaths/pedestrian ramps, etc shall be dedicated to road at no cost to DIT.
13. All vehicles shall enter and exit the site in a forward direction.
14. Any infrastructure within the road reserve (including stobie pole/s, street light/s, directional sign/s, etc) that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the applicant.
15. All off-street parking and vehicle manoeuvring areas shall be designed in accordance with AS/NZS 2890.1:2004, AS/NZS 2890.6:2009 and AS2890.2:2018. Additionally, clear sightlines, as shown in Figure 3.3 'Minimum Sight Lines for Pedestrian Safety' in AS/NZS 2890.1:2004, shall be provided at the property line to ensure adequate visibility between vehicles leaving the site and pedestrians on the adjacent footpath.
16. A final stormwater management plan shall be developed in conjunction with DIT. All drainage infrastructure is to be to the satisfaction of Council and DIT.
17. Stormwater run-off shall be collected on-site and discharged without impacting the safety or integrity of John Rice Avenue, Philip Highway, Mark Road and Coglein Road. Any alterations to the road drainage infrastructure required to facilitate this shall be at the applicant's expense.

ADVISORY NOTES

Land Division Consent

Advisory Notes imposed by SPC Planning Services under Section 122 of the Act

1. Under Part 20A of the *Telecommunications Act 1997 (Cth)*, developers are required to install fibre-ready facilities (e.g. pit and pipe) in their developments, unless the development qualifies for an exemption. Developers can face penalties if they sell or lease building lots or units in new developments without fibre-ready facilities installed.

Under the Commonwealth's Telecommunications in New Developments Policy, developers are also expected to contract a telecommunications carrier (being any statutory infrastructure provider (SIP) or NBN Co as the default SIP) to provide services in their development. Carriers should install fixed-line network infrastructure in new developments, unless that is not commercially feasible, in which case they should use fixed-wireless or satellite technologies.

Further details of these requirements can be found at:

www.infrastructure.gov.au/department/media/publications/telecommunications-new-developments

Advisory Notes imposed by Commissioner of Highways under Section 122 of the Act

2. Any further increase in traffic generation associated with development of Lots 1, 3 and 4 will need to be supported by a comprehensive traffic and parking assessment.
3. The applicant shall notify DIT's Traffic Management Centre (TMC) – Roadworks on 1800 434058 or email dit.roadworks@sa.gov.au to gain approval for any road works, or the implementation of a traffic management plan during the construction and or utility provision, tree removal, etc for the subject development. Before any construction/roads works the contractor(s) shall complete a 'Notification of Works' form via the following link:
https://www.dit.sa.gov.au/contractor_documents/works_on_roads_by_other_organisations

CARRIED UNANIMOUSLY

7 APPLICATIONS FOR CONSIDERATION - CATEGORY 1

Nil

8 OUTSTANDING MATTERS – APPEALS AND DEFERRED ITEMS

Nil

9 OTHER BUSINESS

9.1 STAFF REPORTS

Nil

10 CONFIDENTIAL MATTERS

Nil

11 POLICY DISCUSSION FORUM

Nil

12 CLOSURE

The meeting closed at 6:54 pm.



NOTICE

of

COUNCIL ASSESSMENT PANEL MEETING

Pursuant to the provisions of Section 82 of the Planning, Development and Infrastructure Act 2016

TO BE HELD IN

**COUNCIL CHAMBERS
PLAYFORD CIVIC CENTRE
10 PLAYFORD BOULEVARD, ELIZABETH**

MEMBERS MAY PARTICIPATE BY ELECTRONIC MEANS

ON

THURSDAY, 20 FEBRUARY 2025 AT 6:00 PM

THIS MEETING WILL ALSO BE VIEWABLE AT
<https://www.youtube.com/user/CityOfPlayford>

A handwritten signature in black ink, appearing to read "Matt Dineen".

MATT DINEEN
SENIOR MANAGER DEVELOPMENT SERVICES
Issue Date: Thursday, 13 February 2025

MEMBERSHIP

MR GEOFF PARSONS – PRESIDING MEMBER

Mr Aaron Curtis
Ms Misty Norris

Ms Cherie Gill (Deputy)
Ms Tanya Smiljanic (Deputy)

Mr Paul Mickan
Mr Adam Squires

**City of Playford
Council Assessment Panel Meeting**

AGENDA

THURSDAY, 20 FEBRUARY 2025 AT 6:00 PM

ACKNOWLEDGEMENT OF COUNTRY

We would like to acknowledge that this land we meet on today is the traditional land of the Kaurna people, and that we respect their spiritual relationship with their country. The City of Playford would also like to pay respects to Elders past, present and emerging.

1 ATTENDANCE RECORD

- 1.1 Present
- 1.2 Apologies
- 1.3 Not Present

2 CONFIRMATION OF MINUTES

RECOMMENDATION

The Minutes of the Council Assessment Panel Meeting held 19 December 2024 be confirmed as a true and accurate record of proceedings.

3 APPLICATIONS WITHDRAWN

4 DECLARATIONS OF INTEREST

5 APPLICATIONS FOR CONSIDERATION – PERSONS WISHING TO BE HEARD

Nil

6 APPLICATIONS FOR CONSIDERATION – NO PERSONS TO BE HEARD

- 6.1 24022584 - Allotment 144 John Rice Avenue, Elizabeth South - Land Division (1 into 4) and Tree Damaging Activity (Attachments)6

Representors: N/A

Applicant: City of Playford c/- Future Urban

7 APPLICATIONS FOR CONSIDERATION - CATEGORY 1

Nil

8 OUTSTANDING MATTERS – APPEALS AND DEFERRED ITEMS

Nil

9 OTHER BUSINESS

9.1 STAFF REPORTS

Nil

10 CONFIDENTIAL MATTERS

Nil

11 POLICY DISCUSSION FORUM

Nil

12 CLOSURE

APPLICATIONS FOR CONSIDERATION

APPLICATIONS FOR CONSIDERATION – NO PERSONS TO BE HEARD

6.1 24022584 - ALLOTMENT 144 JOHN RICE AVENUE, ELIZABETH SOUTH - LAND DIVISION (1 INTO 4) AND TREE DAMAGING ACTIVITY

Snapshot

Author:	Andrew Humby, Consultant Planner
Proposal:	Land Division (1 into 4) and Tree Damaging Activity
Development Number:	24022584
Date of Lodgement:	17 September 2024
Owner:	City of Playford
Applicant:	City of Playford c/- Future Urban
Location:	Allotment 144 John Rice Avenue, Elizabeth South
Zone:	Strategic Innovation Zone
Subzone:	Activity Node Sub Zone
Classification:	Performance Assessed
Public Notification Category:	No
Representation Received:	N/A
Request for Additional Information Made?	Yes
Recommendation:	To Grant Planning and Land Division Consent subject to a reserved matter and conditions
Attachments:	<div> <div>1. 1.</div> <div>Cover Letter</div> </div> <div> <div>2. 2.</div> <div>Plan of Division</div> </div> <div> <div>3. 3.</div> <div>Tree Survey Plan and Tree Removal Plan</div> </div> <div> <div>4. 4.</div> <div>Civil Works and Grading Plan</div> </div> <div> <div>5. 5.</div> <div>Stormwater Management Plan</div> </div> <div> <div>6. 6.</div> <div>Prelim Infrastructure Assessment</div> </div> <div> <div>7. 7.</div> <div>Traffic and Parking Assessment</div> </div> <div> <div>8. 8.</div> <div>Development Impact (Arborist) Report</div> </div> <div> <div>9. 9.</div> <div>DIT referral comments</div> </div> <div> <div>10. 10.</div> <div>Delegate Letter</div> </div>

1. The Subject Land

The subject land is identified as Allotment 144 of Filed Plan 130753 within Certificate of Title Volume 6203 Folio 773.

The subject land is located on the north-eastern corner of the intersection of John Rice Avenue and Philip Highway. The subject land covers an area of approximately three (3) hectares and contains frontages to the following roads:

- John Rice Avenue – 278 metres (approximately)

- Philip Highway – 138 metres (approximately)
- Mark Road – 100 metres (approximately)
- Coglin Road – 64 metres (approximately).

John Rice Avenue and Philip Highway are both classified as State Maintained Roads and are managed by the Department for Infrastructure and Transport (DIT).

The subject land is currently undeveloped, with no buildings or structures present. The land is however covered with extensive vegetation, including 28 Significant trees and 89 Regulated trees.

There are also no existing vehicle access points along any of the four (4) road frontages.

The land is relatively flat, with a gentle slope descending toward the northern and western boundaries.

No Land Management Agreements, easements or encumbrances are registered on the Certificate of Title. However, it is known that existing electricity infrastructure, including overhead power lines and a disused underground pilot cable are found within the subject land.

2. The Locality

The locality is characterised by a mix of land uses and large areas of vegetated open space, with the multi-lane road network (John Rice Avenue and Philip Highway) and notable barrier between differing land uses.

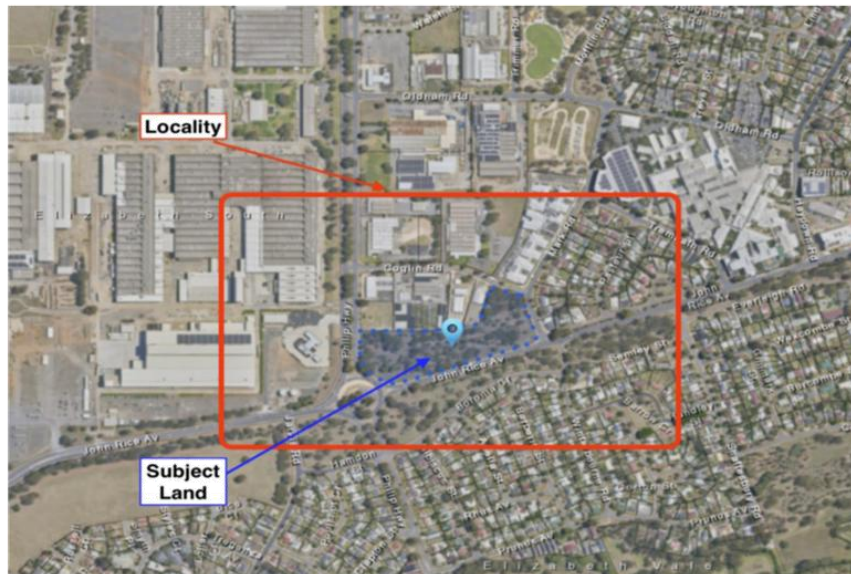
A notable feature to the west of Philip Highway is the former Holden's site and a more recently constructed petrol filling station on the intersection of Philip Highway and John Rice Avenue.

To the immediate south is a wide-open space reserve abutting John Rice Avenue, with residential allotments, located within the General Neighbourhood Zone, of a consistent size and configuration located further to the south. The General Neighbourhood Zone extends north of John Rice Avenue to include a triangular section that adjoins the subject land to its east.

The ACH Healthia Aged Care and Retirement Living Complex is located to the north of the subject land. Orientated towards Mark Road, the built form comprises single storey independent living dwellings and a two-storey main building setback from the street behind visitor car parking.

To the north of the subject land, a mix of land uses are located within the Employment Zone, including a place of worship, equipment hire depot (service trade premise), transport logistics, recycling depot and other light industrial activities.

2.1 Locality Plan



2.2 Zoning

The subject land is located with the Strategic Innovation Zone (the Zone) and Activity Node Subzone (the Subzone) as identified in the Planning and Design Code (the Code).

The following Overlays and Technical and Numerical Variations (TNVs) also apply:

- Airport Building Heights (Regulated) Overlay – All structures over 45 metres
- Affordable Housing Overlay
- Building Near Airfields Overlay
- Defence Aviation Area Overlay – All structures over 90 metres
- Hazards (Flooding – General) Overlay
- Noise and Air Emissions Overlay
- Prescribed Wells Area Overlay
- Regulated and Significant Tree Overlay
- Traffic Generating Development Overlay
- Urban Transport Routes Overlay
- Concept Plan 81 – Edinburgh Defence Airfield Lighting Constraints
- Interface Height.

2.3 Zone Map



3. Background

In 2011, the City of Playford, in collaboration with SA Health, recognised the need to plan for the future health needs of the region. This led to the preparation of the 'Playford Health & Wellbeing Precinct Master Plan' (Master Plan) for the precinct, which identified opportunities to create complementary health and wellbeing services surrounding the Lyell McEwin Hospital.

The Master Plan envisioned the integration of public and private healthcare facilities, allied health services, tertiary education and research institutions, and residential accommodation to support a thriving health-focused community. This approach sought to not only meet immediate healthcare demands but also to establish the region as a leader in health innovation, research, and education.

To enable the delivery of this vision, two (2) Development Plan Amendments (DPAs) were introduced: The Lyell McEwin and Allied Health Precinct DPA in November 2013 and Playford Health Precinct DPA in April 2020. These DPAs rezoned additional land surrounding the Lyell McEwin Hospital to support the expansion of health services, including private hospitals, consulting rooms, research centres, and educational facilities. This rezoning, now reflected in the Code under the Zone, established the framework for long-term growth and investment in the precinct.

As part of this strategy, the City of Playford has worked to unlock key Council-owned sites within the precinct to attract private and state investment. Apart from the recent State Government funded development within the Lyell McEwin Hospital site, such as the Emergency Department expansion, additional 48 hospital beds and multi-deck car park, several notable developments have occurred:

- Fluid Solar House: A state-of-the-art facility combining innovative renewable energy technologies, commercial office space and consulting rooms
- Elizabeth Vale Centre Northwest Development: A mixed-use facility support healthcare and related services in close proximity to the Lyell McEwin Hospital
- ACH Healthia: An aged care complex that also serves as a university training centre, fostering collaboration between healthcare delivery and tertiary education
- Mofflin Reserve: The redevelopment of the local park to service the Health Precinct and surrounding residential areas. The cost of the redevelopment was approximately \$4.6 million.

In addition, the community land status previously applying to Allotment 144 was revoked in late 2017 to facilitate its future development. As required by the *Local Government Act 1999*, the City of Playford engaged extensively with the broader community to ensure alignment with the long-term goals of the Master Plan. This consultation reaffirmed the commitment to developing the land in a manner consistent with the precinct's vision.

More recently, in early 2023, planning consultants engaged by Council to assist with this development application formally wrote to the Minister for Planning, requesting that the development proposal be referred to the State Planning Commission for assessment. This request was made due to a perceived conflict of interest, as Council holds the dual role as both the landowner and applicant.

In response, the Delegate of the Minister for Planning wrote to Council on 8 February 2023, advising that the independent Council Assessment Panel is well positioned to appropriately assess and determine the merits of the proposal. This advice confirmed that the assessment could proceed in accordance with the requirements set out in the *Planning, Development and Infrastructure Act 2016* (the Act) and the *Planning, Development and Infrastructure (General) Regulations 2017*.

While the Council's Assessment Manager normally holds the delegation to consider development proposals of this nature, additional steps have been taken to ensure transparency and maintain public confidence in the planning process. Given the Council's dual role, the proposal has been referred to the Playford's Council Assessment Panel for its consideration and determination.

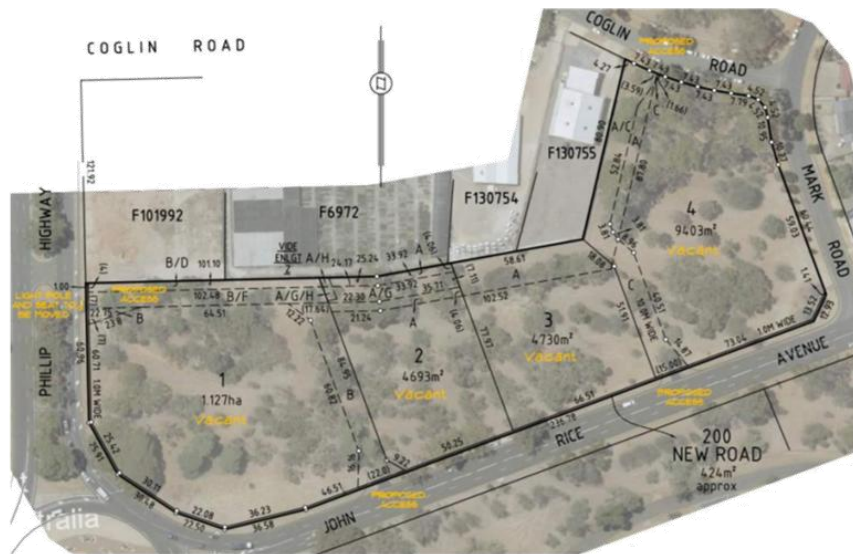
4. The Proposal

The City of Playford seeks Planning and Land Division Consent for a land division that divides one (1) existing allotment into four (4). To facilitate the creation of the proposed allotments and the required vehicular access and service infrastructure (sewer, water, stormwater, and electricity) the removal of 11 significant trees and 22 regulated trees are proposed to be removed.

The proposed land division will include:

- Allotment 1 - 1.127 hectares with access provided via a shared right of way with Lot 2, connecting to John Rice Avenue and Philip Highway
- Allotment 2 – 4,693m² with access provided via a shared right of way with Lot 1, connecting to John Rice Avenue and Philip Highway
- Allotment 3 – 4,730m² with access provided via a shared right of way with Lot 4 connecting to John Rice Avenue and Coglein Road

- Allotment 4 – 9,403m² with access provided via a shared right of way with Lot 3 connecting to John Rice Avenue and Coglein Road.



Extract of Plan of Division

The proposed allotments are designed to accommodate a variety of uses, including allied health (consulting rooms), office, and commercial activities, consistent with the objectives of the Zone and the Subzone.

Access to John Rice Avenue and Philip Highway (State-maintained Roads) has been planned as left-in, left-out only, in consultation with the DIT. The shared driveways and access points have been designed to accommodate the movements of 19-metre semi-trailers.

An Infrastructure Assessment proposes that most utility services (water, stormwater, sewer, and electricity) will be located in easements located at the rear of the allotments. Existing overhead powerlines are to be removed and redirected underground, with stormwater to be disposed via existing drainage network on Mark Road or Coglein Road.

A Stormwater Manager Report has also been provided which outlines how stormwater, detention, flooding, and water sensitive urban design can be managed once all the proposed allotments are fully developed.

To facilitate the creation of the proposed allotments along with the required vehicular access and service infrastructure the removal of 11 significant trees and 22 regulated trees are proposed. The applicant has chosen to pay into Council's Urban Tree Fund rather than progress the replanting of trees on the subject land.

This application does not propose the removal of the balance of regulated and significant trees that are located on the subject land. Rather, these trees are to be considered via future applications once the future land uses/built form outcomes are known.

A copy of the proposal plans and supporting documentation are contained in the Attachments.

5. Procedural Matters

5.1 Classification

The proposed development involves the division of land to create additional allotments along with tree damaging activity. The proposal is considered to fit the 'Land Division' and 'Tree Damaging Activity' definitions as detailed in Part 7 of the Code.

The above elements are not classified as an Accepted, Deemed-to-Satisfy or Restricted development within the relevant Tables of the Zone. The proposed development is therefore a Code Assessed - Performance Assessed development pursuant to Sections 105(b) and 107 of the Act, requiring an on-merit assessment against the relevant provisions of the Code.

5.2 Public Notification

All classes of performance assessed development require public notification unless, pursuant to Section 107(6) of the Act, the class of development is excluded from notification by the Code in Table 5 – Procedural Matters (PM) - Notification of the relevant Zone.

Table 5 of the Zone includes references to land uses that are exempt from public notification. In this instance, 'Land Division' and 'Tree Damaging Activity' are both listed as land uses that are exempt, thus not requiring any form of public notification.

5.3 Statutory Referrals

As required under the procedural matters of the Urban Transport Routes Overlay, a referral to the Commissioner of Highways (via DIT) was necessary due to the proposal involving the creation of a new access or junction onto a State-maintained Road.

During the assessment process, DIT provided clarification regarding the modelling and data submitted. In response, additional supporting documentation was supplied. Council's engineers have assisted through the assessment process meeting with the DIT to review traffic management and access arrangements. A number of amendments to the proposed access arrangements were requested to improve traffic safety to DIT's requirements.



To address an outstanding matter per the above Concept Plan, Council staff recommended incorporating a Reserved Matter to ensure the documentation of a channelised left-turn lane on the Plan of Division.

Following a further review of this information, DIT confirmed its support for the proposed access arrangements, subject to the inclusion of specific Conditions of Approval and the use of the recommended Reserved Matter.

In addition, standard referrals to SA Water and the State Planning Commission (Planning Services) were required as part of the land division process. Both agencies issued standard Conditions of Approval.

5.4 Internal Referrals

An internal referral was undertaken by Council's Tree Services team to review the proposed removal of significant and regulated trees.

The following comments were received:

- Tree Services would accept the removal of the proposed trees for this development and will work with our property team to ensure tree offset/mitigation for the removed trees in line with Council and State targets on tree canopy
- All other trees to be impacted via Tree Protection Zone encroachments, works must be undertaken abiding to the Tree Protection measures listed within the submitted Arborist Report. Further to this, to ensure all trees remain viable post development, any Tree Protection Zone encroachment over 10% must be undertaken utilising non-destructive methods of excavation (hydrovac, hand dig). Any roots over 30mm diameter that are found within the excavation areas and require removing will need to be recorded in location and photos taken, this information will need to be submitted to City of Playford Arborist to ensure tree viability and safety of community.

6. Key Issues

The following matters are considered pertinent in reaching a recommendation for the proposal:

- Whether the proposal is an appropriate form of development in the Zone
- Whether the removal of various Regulated and Significant trees is appropriate to enable development outcomes
- Whether the proposal is consistent with the general policies of the Code.

7. Planning Assessment

7.1 Desired Outcome and Land Use

The Zone is guided by a singular Desired Outcome, which promotes a diverse range of health, education, and research activities, complemented by compatible land uses such as housing, accommodation, tourism, hospitality, recreation, and retail.

Performance Outcome (PO) 1.1 of the Zone expands on this objective by supporting 'development that is associated with or ancillary to the provision of health and education services and the conduct of research.' The corresponding Designated Performance Feature (DPF) 1.1 further specifies a broad range of land uses that align with these objectives.

While 'land division' is not explicitly identified in DPF 1.1, the proposal seeks to create four (4) appropriately sized allotments, ranging from 4,693m² to 1.127 hectares, providing opportunities for a range of development outcomes that align with the intent of the Zone.

Within the Zone, the only land division-specific policy (PO 4.1) states:

PO 4.1 Land division and site amalgamation facilitates integration of buildings, vehicle parking areas, access points and landscaping.	DTS/DPF 4.1 None are applicable.
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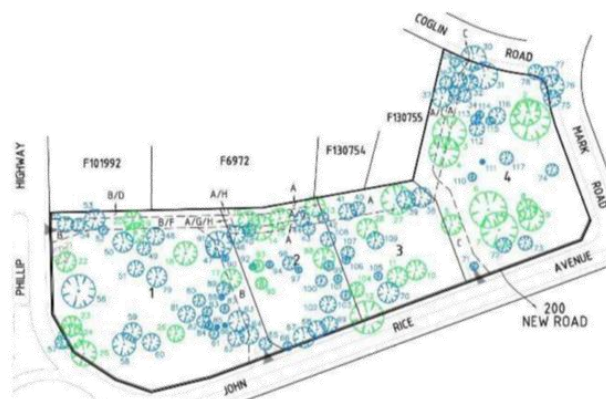
As there is no associated DPF for this outcome, assessment must consider whether the proposed land division achieves the policy's intent.

In this case, the proposed allotment sizes and configuration have been designed to support an integrated and shared access arrangement, ensuring future land uses can function effectively within the Zone. The application has demonstrated that these shared access arrangements provide safe and convenient access to each allotment, taking into account their proximity to adjoining State-maintained roads and the anticipated traffic types and volumes associated with future development.

The proposal allotments are therefore considered to be consistent with the intent of the Zone.

7.2 Regulated and Significant Tree Removal

As illustrated in the extract of the submitted Tree Survey Plan, the subject land contains large areas of vegetation that includes 28 Significant trees (one (1) is identified as dead) and 89 Regulated trees (eight (8) are Aleppo Pines that are exempt).



Extract of Tree Survey Plan

To facilitate the creation of the proposed allotments and the required vehicular access and service infrastructure (sewer, water, stormwater and electricity) the removal of 11 Significant trees and 22 Regulated trees are proposed. As illustrated in the Tree Removal Plan shown below, the majority of trees to be removed are located along the northern boundary where the proposed road and easements are to be constructed:



Extract of Tree Removal Plan

Project Green, qualified arborists provided a comprehensive assessment on all existing regulated and significant trees throughout the site. Their assessment also identified the impacts of the proposed civil works and service infrastructure on trees subject to encroachments. FMG Engineering have also reviewed Project Green's recommendations, particularly the ability to use hydro-vac for the installation of services, which identified that this method was not a practical solution for all trees.

The Code contains various policies within the Regulated and Significant Tree Overlay that provide guidance whether a Significant or Regulated tree is worthy of retention or can be removed in the interest of facilitating an appropriate development.

The majority of the Significant trees affected by the proposed civil works and service infrastructure are Sugar Gums (*Eucalyptus cladocalyx*). Of these, two (2) are classified as being in 'poor' condition, six (6) in 'fair' condition and four (4) in 'good' condition. While Sugar Gums are indigenous to South Australia, Project Green has advised that they are not native to the local area.

The affected Regulated trees comprise a more diverse range of species, with Lemon-Scented Gums, Swamp Mallets and Aleppo Pines (an 'exempt' species) being the most prevalent. The majority of these trees are in a 'good' condition, however they are predominantly multi-stemmed varieties that qualify as Regulated based on their combined trunk circumference rather than their ecological or local significance.

To assist in determining if the trees could be adequately protected, Project Green calculated the Tree Protection Zone for each tree as a means of protecting them throughout the development process. The inclusion of Tree Protection Zones around each tree affected by the proposed civil works and service infrastructure would result in the majority of the subject land being considered unsuitable for urban development.

The removal of these trees is however considered to be essential to facilitate the delivery of necessary civil works and service infrastructure, ensuring the site can be developed in accordance with the intent of the Zone. The various FMG Engineering reports considered the most suitable location for essential infrastructure and road configuration, confirming that the chosen area to the north of the site is the ideal design option. Although this results in tree damaging activity, the consideration of other design options aligns with the intent of PO 1.4 of the Regulated and Significant Tree Overlay, that seeks to balance development outcomes with environmental considerations.

<p>PO 1.4 A tree-damaging activity in connection with other development satisfies all the following:</p> <ul style="list-style-type: none"> a) it accommodates the reasonable development of land in accordance with the relevant zone or subzone where such development might not otherwise be possible b) in the case of a significant tree, all reasonable development options and design solutions have been considered to prevent substantial tree-damaging activity occurring. 	<p>DTS/DPF 1.4 None are applicable</p>
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To compensate for the removal of 11 Significant trees and 22 Regulated trees, the applicant has agreed to a payment into the City of Playford Urban Tree Fund based upon the fee structure of the PDI Regulations – in the order of \$39,500. This Fund ensures that contributions are allocated for future tree planting initiatives.

Since 2011, Council has consistently outlined its long-term intent to develop the subject land as part of its Masterplan and Code Amendments, which focused on providing land for allied health and wellbeing services surrounding the Lyell McEwin Hospital precinct. Council reaffirmed this commitment to develop the land in 2017 through the community land revocation process, recognising that tree removals would be expected to facilitate the long term planned development.

It is important to note that at the outset of this master-planned project, only 28 trees on the subject land were classified as Regulated or Significant. However, on May 16, 2024, changes to the legislation expanded the definition, leading to an additional 89 trees now being designated as Regulated.

It is acknowledged that numerous other Regulated and Significant trees are located throughout the subject land. Many of these trees are positioned centrally within the proposed allotments and are likely to be impacted by future development. However, given the unknown design and layout of future development on each proposed allotment, any further tree removals will be assessed as part of subsequent land use applications to ensure they are directly related to future development needs of each site.

A review of the submitted Tree Survey Plan has identified clusters of trees positioned near allotment boundaries, presenting opportunities for retention without significantly constraining future development. In particular:

- Allotment 1 - features a cluster of trees (Trees 23, 24, 25, and 57) at the corner of Philip Highway and John Rice Avenue that are notable features when viewed from the adjoining roundabout
- Allotment 2 - contains three (3) trees (Trees 67, 68, and 69) along the John Rice Avenue frontage, as well as additional trees (Trees 103 and 108) near the proposed side boundary
- Allotment 3 - contains the largest tree on the subject land (Tree 12, with a 4.3m circumference), which is a prominent feature along the John Rice Avenue footpath. Additional trees (Trees 104 and 106) are also located along the proposed side boundary
- Allotment 4 - contains a cluster of four (4) trees (Trees 75, 76, 77, and 78) at the intersection of Mark road and Coglein Road, contributing to the streetscape character. Another group of trees (Trees 30, 31, 32, 33 and 34) are located adjacent the proposed road entrance off Coglein Road.

Given that many of the more notable clusters or prominent trees are located on John Rice Avenue, Mark Road and Coglein Road frontages, this provides increased opportunities for their retention as part of future development proposals. This provides in part, increased adherence to PO 3.1 of the Regulated and Significant Tree Overlay that encourages an allotment configuration that enables the retention of trees as 'far as reasonably possible' in subsequent development.

Council's Tree Services team have been engaged throughout this assessment process. Although the removal of trees is not actively encouraged, they acknowledge the necessity of removing the proposed Regulated and Significant trees. The contribution to Council's Urban Tree Fund is supported as an effective means of mitigating the loss of existing trees through an offset scheme.

Additionally, a Condition of Approval has been proposed to ensure that all trees not identified for removal, but which may have their Tree Protection Zone encroached during construction of the proposed easement and road access, are suitably protected.

In summary, the proposal seeks to strike a balance between necessary tree removals and strategic retention opportunities, ensuring the delivery of the Zone while preserving key landscape features where practicable. As such, it is considered that the proposed division, despite resulting in some tree damaging activity, represents an appropriate design and configuration to accommodate the reasonable development of the land.

7.3 Land Division General Policies

The Land Division General Development Policies provide a framework to ensure that allotments are appropriately designed for their intended use, facilitate the efficient provision of infrastructure, and allocate sufficient land for the retention of existing vegetation where possible.

As outlined in this report, the proposed land division will create four (4) allotments (one (1) existing allotment into four (4) allotments), each of a substantial size to support a range of development outcomes aligned with the intent of the Zone. This division is consistent with PO 1.1, 2.3, 2.4 and 3.1, ensuring that future development supports the intended strategic objectives of the area.

Vehicular access to the proposed Allotments will be obtained from John Rice Avenue and Philip Highway, both State maintained roads. The shared driveways and access points are designed to accommodate 19-metre semi-trailers, ensuring consistency with PO 3.1, 3.2, 3.4, 3.6, 3.7 and 3.8.

Infrastructure, as detailed further in this report, are designed within dedicated easements to support the anticipated land uses. These infrastructure provisions align with PO 2.4, 2.5 and 4.1, ensuring orderly and efficient service delivery.

While the retention of vegetation is a key consideration, some existing vegetation will need to be removed to facilitate shared driveways and infrastructure easements. The location of these easements and access roads has been carefully selected to balance development objectives with landscape preservation, ensuring the best possible outcome within the Zone. Other significant vegetation clusters will be retained where feasible.

7.4 Infrastructure

The Code provisions relating to infrastructure are directed at ensuring adequate water, stormwater, power and waste management services are provided in an orderly and cost-effective manner.

An Infrastructure Assessment proposes that most utility services (water, stormwater, sewer, and electricity) will be located in easements located at the rear of the allotments. Existing overhead powerlines are to be removed and redirected underground as they currently constrain future development on proposed Allotment one (1), with stormwater to be disposed via an existing drainage network on Mark Road or Coglein Road.

A Stormwater Management Report has also been provided that outlines how stormwater, detention, flooding, and water sensitive urban design can be managed once all of the proposed allotments are fully developed.

The infrastructure and stormwater proposals have been undertaken by FMG Engineering (FMG) in accordance with Council's land division and stormwater guidelines. Council's engineers have also provided input into the design of the infrastructure and road upgrades as part of the assessment process.

FMG's infrastructure assessments have also considered the potential civil works and grading requirements to ensure minimal gradient across each allotment, that seeks to minimise excessive cut or fill.

The resulting infrastructure and services upgrades are considered to achieve PO 2.1, 2.4, 2.5, 4.1, 4.2, 7.1, 7.2 of the Land Division General Policies and PO 5.2 of the Infrastructure and Renewable Energy Facilities General Policies, ensuring an orderly and efficient delivery of necessary.

Required streetscape upgrades to external verges, including Mark Road, Coglein Road and John Rice Avenue are being resolved through contractual requirements on future owners, with implementation to be resolved through the resulting application process.

7.5 Interface between Land Uses

The Interface between Land Uses General Development policies are designed to mitigate adverse effects on or from adjoining and nearby land uses.

The proposed allotments are designed to support a mix of uses, including allied health (consulting rooms), office, and commercial activities, consistent with the objectives of the Zone and the Subzone.

The proposed land uses are anticipated to have minimal impact on adjacent industrial and commercial land uses located to the west, north, and northwest. To the south, existing residential allotments are located more than 60 metres away, with John Rice Avenue and landscaped open space serving as a buffer to minimise any potential impacts.

To the east, five (5) dwellings fronting Mark Road and an aged care complex to the northeast are in proximity to the subject land. However, proposed Allotment four (4), which has a substantial area of 9,403m², provides an opportunity for increased built-form separation from these dwellings. Depending on the future land uses for this allotment, acoustic reports may be required to ensure compliance with relevant noise standards and minimize any potential disturbances.

The Zone and the Subzone provisions, coupled with the proposed allotment sizes, will support appropriate design outcomes that align with the Desired Outcomes and Performance Outcomes of the Interface Between Land Uses General Development Policies. The proposed division has been designed to ensure that land use transitions are managed effectively while maintaining the integrity of both existing and future development within the area.

7.6 Site Contamination

The proposal land division seeks to create four (4) allotments that will accommodate larger floor plate land uses that are consistent with the intent of the Zone – namely allied health (consulting rooms), office, and commercial activities. Such land uses are not considered to meet the definition of a 'sensitive use' (Schedule 8 2A(1)(b) of the *Planning, Development and Infrastructure (General) Regulations 2017* and Practice Direction 14) and does not require any detailed site contamination investigations at this stage.

It is acknowledged that Council have been in discussions with a number of future purchasers of the proposed allotments, however future land uses have yet to be clearly confirmed. It is considered that more detailed site contamination assessments can be undertaken once formalised land use applications are submitted, if required.

As such, no further review of site contamination is required as part of this proposal.

8. Conclusion

The City of Playford C/- Future Urban seeks Planning and Land Division Consent for a land division (one (1) allotment into four (4)) and tree damaging activity at Allotment 144 John Rice Avenue, Elizabeth South.

The proposed land division seeks to create four (4) allotments that are considered to be an appropriately sized and shaped to accommodate the range of allied health, office, and commercial uses envisaged in the Zone and Subzone. The land division has been designed with an integrated and shared access arrangement, ensuring the efficient operation of each allotment, without compromising the operation of adjoining State-maintained roads.

It is acknowledged that the proposal seeks the removal of several regulated and significant trees to facilitate future development. However, this is considered appropriate within the Regulated and Significant Tree Overlay, as the positioning of most trees would restrict reasonable development in line with the Zone and Subzone's objectives. The applicant has chosen to pay into the City of Playford Urban Tree Fund that will enable future tree plantings within the Council area.

From an infrastructure and servicing perspective, supporting documentation confirms that the proposal supports the orderly and economic provision of essential services, aligning with various Land Division policies of the Code. Each allotment is of a suitable size and configuration to incorporate stormwater treatment devices, accommodate adequate detention capacity, and effectively manage flooding risks.

On balance, the proposed development is not considered to be 'seriously at variance' with the relevant provisions of the Code. Rather, the proposal warrants Planning and Land Division Consent subject to the conditions listed below.

9. Recommendation

STAFF RECOMMENDATION

It is therefore recommended that the Council Assessment Panel:

1. DETERMINES that the proposed development is not seriously at variance with the provisions of the Planning and Design Code
2. GRANTS Planning and Land Division Consent to the application by the City of Playford C/- Future Urban for a Land Division (1 allotment into 4) and Tree Damaging Activity at Allotment 144 John Rice Avenue, Elizabeth South as detailed in Development Application ID. 24022584 subject to the following reserved matter conditions:

Reserved Matter

Pursuant to Section 102(3) of the *Planning, Development and Infrastructure Act 2016* (the Act), the following matter shall be reserved for further assessment to the satisfaction of the Council Assessment Panel, and sub-delegated to the Assessment Manager, for determination prior to the granting of Development Approval:

1. The applicant shall submit an updated Plan of Division which has an amended Right of Way B to facilitate the augmentation of access in lot 1 and 2 prepared in consultation with the Department of Infrastructure and Transport

Planning Consent Conditions

1. The development must be undertaken, completed and maintained in accordance with the plan(s) and information detailed in this Application except where varied by any condition(s) listed below.
2. All other trees (that are not identified to be removed) to be impacted via TPZ encroachments, works must be undertaken abiding to the Tree Protection measures listed within the submitted Arborist Report. Further to this, to ensure all trees remain viable post development, any TPZ encroachment over 10% must be undertaken utilising non-destructive methods of excavation (hydrovac, hand dig). Any roots over 30mm diameter that are found within the excavation areas and require removing will need to be recorded in location and photos taken, this information will need to be submitted to City of Playford Arborist to ensure tree viability and safety of community.

Land Division Consent Conditions

1. Payment of an amount calculated in accordance with the *Planning, Development and Infrastructure (Fees, Charges and Contributions) Regulations 2019* be made into the City of Playford Urban Tree Fund in lieu of planting replacement trees. Payment must be made prior to clearance under Section 138 of the Act.

Conditions imposed by South Australian Water Corporation under Section 122 of the Act

1. This development is within a current Augmentation Charge area and SA Water Gazetted Augmentation charges shall be paid by the developer.

2. If a connection/s off an existing main is required, the connection/s to your development will be a standard or a non-standard costs. This will be determined by an investigation where appropriate.

3. SA Water has water/wastewater network assets within close proximity to the location of this development.

An investigation, if required, will be undertaken following the provision of the development details to enable a servicing strategy to be provided. Augmentation infrastructure works may need to be undertaken by the Developer and/or SA Water to enable servicing of this development. SA Water may contribute to the cost of these works.

SA Water Gazetted Augmentation Charges, Connection and Extension Fees and Capacity Upgrade fees and charges shall be paid by the developer.

SA Water may contribute to any material upsizing requirements.

Conditions imposed by SPC Planning Services under Section 122 of the Act

4. A final plan complying with the requirements for plans set out in the Manual of Survey Practice Volume 1 (Plan Presentation and Guidelines) issued by the Registrar General to be lodged with the State Planning Commission for Land Division Certificate purposes.
5. Payment of \$26,121.00 into the Planning and Development Fund (3 allotment/s @ \$8707.00/allotment). This payment will not become payable until the Certificate of Approval application under Section 138 has been lodged. At that time the Land Division Registration fee (currently \$1154.00), will also become payable. The total of the two fees must be paid in a single payment. Payment may be made via credit card (Visa or MasterCard) online at plan.sa.gov.au, over the phone on 7133 3028, or cheques may be made payable to the State Planning Commission, marked "Not Negotiable" and sent to GPO Box 1815, Adelaide 5001

ADVISORY NOTES

Land Division Consent

Advisory Notes imposed by SPC Planning Services under Section 122 of the Act

Under Part 20A of the *Telecommunications Act 1997* (Cth), developers are required to install fibre-ready facilities (e.g. pit and pipe) in their developments, unless the development qualifies for an exemption. Developers can face penalties if they sell or lease building lots or units in new developments without fibre-ready facilities installed.

Under the Commonwealth's Telecommunications in New Developments Policy, developers are also expected to contract a telecommunications carrier (being any statutory infrastructure provider (SIP) or NBN Co as the default SIP) to provide services in their development. Carriers should install fixed-line network infrastructure in new developments, unless that is not commercially feasible, in which case they should use fixed-wireless or satellite technologies.

Further details of these requirements can be found at:
www.infrastructure.gov.au/department/media/publications/telecommunications-new-developments

6.2 25005488: 17 STEBONHEATH RD, EDINBURGH NORTH - CHILD CARE FACILITY WITH ASSOCIATED CAR PARKING, LANDSCAPING AND ILLUMINATED SIGNAGE INCLUDING A PYLON SIGN TO 4.6M HEIGHT

Author:	Andrew Simons / Leif Burdon
Proposal:	Child care facility with associated car parking, landscaping and illuminated signage including a pylon sign to 4.6m height
Development Number:	25005488
Date of Lodgement:	28 February 2025
Owner:	Brave Wholesalers Pty Ltd
Applicant:	Leyton Property Pty Ltd
Location:	17 Stebonheath Road, Edinburgh North
Zone:	Strategic Employment Zone
Classification:	Performance Assessed
Public Notification Category:	Notification required
Representation Received:	No
Request for Additional Information Made?	Yes
Recommendation:	To Grant Planning Consent

Attachments:	1. Development Application Snapshot 2. Architectural Documents 3. Siteworks Plan 4. Planning Report 5. Acoustic Report 6. Traffic Report 7. Preliminary Site Investigation 8. Referral Responses
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1. The Subject Land

The land on which the proposal would be constructed is comprised of two (2) generally square allotments that together form an area of land totalling approximately 16.4 hectares. The land has a frontage to Womma Road of approximately 280m and a secondary frontage to Stebonheath Road of approximately 570m. Womma Road is a State maintained road and falls under the jurisdiction of the Department for Infrastructure and Transport (DIT). A large, single-laned roundabout is located at the intersection of the two (2) roads. Womma Road forms a key east-west connection within the City of Playford providing connection to and from the Northern Expressway to Main North Road.

The land currently accommodates a large transport distribution centre (Drakes) on the southern-most portion and a shop in the form of a takeaway restaurant (McDonald's) in the eastern-most corner (see Figure 1, below).

The remainder of the overall land is vacant aside from several stobie poles. The relevant topological features being three (3) large trees near the Womma Road frontage, and a large drainage swale running along the inside of the western boundary.



Figure 1: Aerial photograph showing the land outlined in blue

It is important to note that the land on which the development is proposed to be established is different from the defined site of the development. This is isolated exclusively to the portion of the land adjacent the northern corner of the land, and facing the Womma Road frontage (see Figure 2, below). The site of the development measures approximately 67m in depth, taken from the Womma Road frontage and approximately 51m in width. It is considered to include a portion of the site defined under application 24042350 as it is proposed to utilise a manoeuvring area and access point that is also proposed under that application.



Figure 2: Location of the site of development, highlighted in red

2. The Locality

The locality for the proposed development is considered to comprise of four (4) distinct quadrants, conveniently dissected by Stebonheath Road and Womma Road (see Figure 3, below).

The south-west consists of the aforementioned distribution centre with a considerable stretch of vacant land between this centre and the site. Further to the west is a currently vacant employment lands estate that has been recently subdivided, with roads constructed, for the purposes of employment type land uses, which could include warehousing, industry and other uses of that general nature. On the northern side of Womma Road is the Eyre residential estate, comprised primarily of single-storey detached dwellings on moderately sized allotments contained within the Master Planned Neighbourhood Zone. This extends eastward across Stebonheath Road, where there is a Reserve of approximately 2.5 hectares and 65m width that acts as a buffer between Stebonheath Road and the existing older housing stock to the east. This housing is also primarily single storey detached dwellings, with a mix of slightly larger allotments along with dwellings on smaller subdivided allotments.

To the south-east are land uses that are generally industrial and commercial in nature. With examples such as retail fuel outlets, warehousing, vehicle wrecking yards, and other general manufacturing.

There is a substantial setback between these land uses and Stebonheath Road, to accommodate a drainage channel that runs from north to south, including within the reserve previously mentioned. There are several pylon signs located along the southern side of Womma Road that are associated with the McDonald's and the retail fuel outlet, as well as another on the eastern side of Stebonheath Road, also associated with the retail fuel outlet. The heights of these signs are 8.5m, 10m and 7.2m, respectively.

2.1 Locality Plan



2.2 Zoning

The subject land is located entirely within the Strategic Employment Zone (the Zone) as identified in the *Planning and Design Code* (the Code). The following Overlays and Technical and Numerical Variations (TNV) also apply:

Overlays:

- Building Near Airfields
- Defence Aviation Area
- Future Road Widening
- Hazards (Flooding)
- Hazards (Bushfire - Urban Interface)
- Hazards (Flooding – General)
- Major Urban Transport Routes (MUTR)
- Prescribed Wells Area
- Regulated and Significant Tree
- Traffic Generating Development
- Water Resources.

Technical Numeric Variations (TNVs):

- Concept Plan (Concept Plan 81 – Edinburgh Defence Airfield Lighting Constraints).

2.3 Zone Map

Figure 4: Zoning map

3. Background

The Application before the Council Assessment Panel (the Cap) was previously scheduled for deliberation at the meeting 17 July 2025, but the item was withdrawn from the agenda at the request of the Applicant in order to address some of the matters that led to a recommendation of refusal. The Applicant has subsequently provided an amended site plan delineating acoustic treatments to increase the protection of the amenity of the potential occupants, as well as an acoustic assessment report examining the likely impacts of surrounding existing land uses and those desired in the Strategic Employment Zone.

The proposed development is closely associated with Application ID 24042350, which was granted development authorisation at the Cap meeting on 17 July 2025. This application was for the construction of three (3) shops (restaurants, with dine-in and takeaway) and one (1) shop (general retail) with associated signage, landscaping, parking and manoeuvring areas and earthworks. The access points authorised in that application would also service the land use in the application before the CAP, but as they were not approved at the time of the application's lodgement, a single access point and driveway are shown on the site plans (Attachment 2) so that in the event the other application was not proceeded with, this proposal would still have access via an access point authorised in the same application.

4. The Proposal

The proposal is for the construction of a child care facility with associated advertising in the form of signage on the fascia of the proposed building and a 4.6m high free-standing sign adjacent the Womma Road frontage. The child care facility is proposed to have a capacity of

119 children and would be supported by up to 25 staff at any one time. The hours of operation for the proposed facility would be 6:30am to 6:30pm, Monday to Friday, with the facility being closed on weekends.

The application also proposes a new access point to Womma Road, together with a new driveway and manoeuvring areas, 28 parking spaces, landscaping and pedestrian paths.

5. Procedural Matters

5.1 Classification

As none of the elements of the proposal can be considered Accepted, Deemed to Satisfy or Restricted, the application is therefore a Performance Assessed form of development, pursuant to Sections 105(b) and 107(1) of the *Planning, Development and Infrastructure Act 2016* (the Act).

5.2 Public Notification

Strategic Employment Zone Table 5 lists all forms of development that are exempt from requiring public notification in accordance with Section 107(6) of the Act. A child care facility is not listed as a class of development that is exempt from notification, and it is considered that the proposed development is not minor in nature. As such, public notification is required.

Public notification was undertaken in accordance with *Practice Direction 3*, running from 11 March 2025 until 31 March 2025. No representations were received during the notification period, valid or otherwise.

5.3 Statutory Referrals

Due to the proposal including a new access point on a state maintained road within the Urban Transport Routes Overlay, the application required formal referral to the Commission of Highways (via DIT) in accordance with Section 122(1)(a) of the Act. The response provided by the DIT is discussed further in this report.

Due to the proposal being for a new land use on a site that had the potential to be contaminated by a Class 1 or 2 activity (as defined in *Practice Direction 19*), the application required referral to the Environment Protection Authority (EPA) in accordance with Section 122(1)(a) of the Act. The response provided by the EPA is discussed further in this report.

5.4 Internal Referrals

Internal referrals were undertaken by Council's engineers to review the parking management, access, manoeuvring and stormwater impacts of the proposed development.

Council's internal stakeholders, comprising of a Stormwater Engineer and Traffic Engineer have reviewed the information and have confirmed that the details and information provided is sufficient to align with relevant Council policies and standards. Matters relating to traffic and access are addressed in further detail within the body of the report.

6. Key Issues

The following matters are considered pertinent in reaching a recommendation for the proposal:

- Whether the proposed land use is acceptable in the proposed location and the Zone, generally; and
- Whether the proposed land use unduly impedes the use of other land within the Zone or impacts upon sensitive land uses in the adjacent neighbourhood type zone; and
- Whether the proposal appropriately addresses the potential impacts and protects future occupants of the facility; and
- Whether the proposed access and parking arrangements and pedestrian movements are acceptable; and
- Whether the proposal is consistent with the relevant general provisions of the Code.

7. Planning Assessment

7.1 Land Use

The Desired Outcomes (DO) for the Zone emphasise an importance for providing opportunities for a wide range of industrial and employment generating land uses.

DO 1 states the following:

A range of industrial, logistical, warehousing, storage, research and training land uses together with compatible business activities generating wealth and employment for the state.

Further to this, DO 2 states:

Employment-generating uses are arranged to:

- support the efficient movement of goods and materials on land in the vicinity of major transport infrastructure such as ports and intermodal freight facilities*
- maintain access to waterfront areas for uses that benefit from direct water access including harbour facilities, port related industry and warehousing, ship building and related support industries*
- create new and enhance existing business clusters*
- support opportunities for the convenient co-location of rural related industries and allied businesses that may detract from scenic rural landscapes*
- be compatible with its location and setting to manage adverse impacts on the amenity of land in adjacent zones.*

Strategic Employment Zone Performance Outcome (PO) 1.1 further emphasises that land uses should meet the following:

Development primarily for a range of higher-impacting land uses including general industry, warehouse, transport distribution and the like is supplemented by other compatible development so as not to unduly impede the use of land in other

ownership in the zone for employment-generating land uses, particularly those parts of the zone unaffected by an interface with another zone that would be sensitive to impact-generating uses.

Further to this, Zone PO 1.2 states:

Development on land adjacent to another zone which is used for residential purposes [should] incorporate a range of low-impact, non-residential uses to mitigate adverse amenity and safety impacts on the adjoining zone.

It is not considered that a child care facility is a land use that is a higher impacting land use as suggested in Zone PO 1.1. Particularly as it is not in the realm of industry, warehousing or transport distribution. It is also not listed in Zone Designated Performance Feature (DPF) 1.1 as one of the land uses that would be most likely to satisfy PO 1.1. However, as per Part 1 of the Code, a DPF is only one way to satisfy a PO and the fact that it is not a use that is listed in the DPF is not necessarily fatal to the application.

Furthermore, Zone PO 1.2 specifically recommends low-impact, non-residential land uses on sites that are at the edge of the Zone and are adjacent to neighbourhood type zones. This is applicable in this case as the land is adjacent the Master Planned Neighbourhood Zone. Again, a child care facility is not listed in the associated DPF 1.2, which instead recommends uses such as consulting rooms, light industry, offices and warehouses as uses that should be located there. This is also not considered to be fatal to the proposal for the same reasons stated above and the merits of the proposal in regard to PO 1.2 instead rest upon an assessment of the impacts of the proposal on nearby sensitive receivers in the adjoining zone.

Zone PO 1.1 also mentions that other land uses may be located in the Zone that supplement those recommended higher-impacting land uses with compatible development, so as to not unduly impede employment generating land uses. If it were found that the proposed child care facility was a land use that was compatible and did not unduly impede employment generating land uses then it could reasonably be said that the PO 1.1 could be satisfied.

To be compatible is taken to be the ability to exist together in harmony, which is the contextual definition applied in the case of *Palumbo Building Pty Ltd V City of Salisbury [2013] SAERDC 33 (25 June 2013)*. It is considered that the question as to whether the land use would impede employment generating land use also contributes to the determination as to whether it is compatible or not. An assessment of the likely impacts of existing land uses upon the proposed land uses and vice versa is therefore required, together with an assessment of the impacts of the proposed child care facility on the nearby residential areas. These impacts will be discussed below.

Should the proposed child care facility, a sensitive receiver, be unable to demonstrate a compatibility with existing and future land uses, then it is considered that the land use is not suitable in the Zone.

7.2 Amenity and Interface

The assessment as to whether the land use is appropriate in the proposed location depends largely on an assessment of the potential impacts of land uses in the Zone upon the proposed child care facility.

Then an assessment as to whether a child care facility would unduly impede the use of other land in the Zone for employment generating land uses. This would then determine whether the land use was compatible and therefore whether Zone PO 1.1 was satisfied. Following this, an assessment of the impacts of the proposed child care facility upon the residential land uses to the north would determine whether Zone PO 1.2 was satisfied.

Under the Code, child care facilities and dwellings are defined as sensitive receivers (Part 8 – Administrative Terms and Definitions). Interface between Land Uses (IBLU) PO 1.1 states:

Sensitive receivers [should be] designed and sited to protect residents and occupants from adverse impacts generated by lawfully existing land uses (or lawfully approved land uses) and land uses desired in the zone.

As per Zone PO 1.1, the desired land uses in the Zone are higher-impacting land uses, including 'general industry, warehouse, transport distribution and the like'. It is considered that these types of land uses would have a high potential to impact upon children attending the proposed child care facility, primarily in the form of noise, vibration or air quality.

It is noted that there is a 25m wide drainage swale on the western side of the development site that would act as a buffer between the proposal and the employment lands estate to the west. It is also noted that the allotments nearest Womma Road within that estate would also need to consider Zone PO 1.2, such that they should also be lower impacting land uses as they too would be adjacent the Master Planned Neighbourhood Zone. This means that there would likely be some separation between the proposed child care facility and potentially impacting development that may come about in the future, but it does not guarantee it. As this would depend upon the land uses and intensity of future proposals and the assessment of their impacts.

Returning to IBLU PO 1.1, the Applicant has provided an acoustic assessment undertaken by Echo Acoustic Consulting that examines the likely impacts of noise from surrounding existing and potential land uses upon the occupiers of the proposed child care facility (see Attachment 5). The acoustic assessment also proposes design treatments to protect the occupants (staff and children) from potential adverse impacts. The proposal is located on the same land as a large distribution centre, which would have heavy vehicles moving in and out with great frequency as well as forklifts and other service vehicles. The acoustic assessment concludes that provided the suggested acoustic measures are incorporated into the proposal the *Environment Protection (Commercial and Industrial Noise) Policy 2023* (the Policy), which sets noise level criteria at sensitive receivers, would be satisfied. These measures include the construction of a 2.4m high acoustic fence (0.35mm thick panels with sealed, airtight gaps) on the southern boundary and a 1.8m high acoustic fence to the eastern boundary. The acoustic assessment used the assumption that only warehouses would be developed on the land to the west, on the opposite side of the swale. This was considered to be inadequate as warehouses were only one type of land use was desired in the Zone (per Strategic Employment Zone DPF 1.1). Therefore, it was not initially considered that the acoustic assessment adequately demonstrated that IBLU PO 1.1 was satisfied.

In response to this, an updated acoustic assessment was provided that examined the potential scenario where a wrecking yard was located on the allotment nearest the site on the opposite side of the swale. Additionally, the Applicant has provided anecdotal advice from the landowner, Drakes Supermarket Group, indicating that the land to the south of the subject site is likely to be utilised for the future expansion of existing operations (refer to Attachment 4 – Planning Report). It was concluded in the acoustic report that provided all suggested acoustic treatments were employed, the noise levels at the sensitive receiver could be kept to a level that satisfied the Policy.

These additional treatments include 6.38mm laminate glazing to all external windows and glass doors, airtight seals to all windows and glass doors, and a 1.8m high acoustic fence to the western boundary as well. It is considered that with all of these measures in place, the likely impacts upon the sensitive receiver would be adequately managed, and so IBLU PO 1.1 is reasonably satisfied.

It is considered unlikely that a child care facility would have impacts upon land in other ownership in the Strategic Employment Zone, as the noise from children is not considered to trouble higher-impacting land uses that would generate their own noise. In this sense, it is not considered that the proposal would compromise the operation of those land uses, which Zone PO 1.1 seeks. However, it could potentially fetter the ability of some land uses that would be envisaged from being established there as any new land use would have to satisfy IBLU 1.2, which reads:

Development adjacent to a site containing a sensitive receiver (or lawfully approved sensitive receiver) or zone primarily intended to accommodate sensitive receivers [should be] designed to minimise adverse impacts.

As a child care facility is a sensitive receiver, new potentially higher-impacting development would need to be designed to minimise impacts upon a land use that, it could be said is not specifically envisaged. It is considered that this would be a potential impediment to employment generating land uses. It is not considered though, that the methods by which such land uses would need to employ in order to reduce these adverse impacts could render them unfeasible. Particularly taking the context of the site into account and the likely separation distances that would be in place. IBLU 4.1 states:

Development that emits noise (other than music) [should] not unreasonably impact the amenity of sensitive receivers (or lawfully approved sensitive receivers).

The associated DPF 4.1 calls for development to satisfy the relevant criteria of the Policy. The Policy sets an indicative noise level in decibels that noise should be limited to at the receiver. It does not however, specify what this level should be for a child care facility within the Zone due to it not being an expected use. The acoustic assessment has considered the extension of a sensitive receiver location further south into the Strategic Employment Zone lands. There is no quantitative measure to which future development should adhere to in regard to noise levels at the child care facility. This does not preclude future development from needing to be designed to minimise adverse impacts, but it may justify a lower standard in impact attenuation. This being said though, the methods available to reduce potential impacts are readily available and can often be retrofitted to existing designs. Methods such as sealed walls, air gaps between solid walls, the relocation of noise-generating activities to the portion of the site away from the sensitive receiver, exhaust treatments are noise absorbent materials are all considered to be able to be reasonably implemented.

It is therefore considered that while it could be reasonably said that the proposal could impede future employment generating land use by requiring them to be more carefully designed, it is not to a level that is considered to be unduly. This is considered to particularly be the case if the acoustic treatments outlined in the acoustic assessment were employed, and the Applicant has provided updated site plans that delineate these. It is therefore considered that the proposal is a reasonably compatible form of development with the higher-impacting land uses envisaged in the Zone. As such, Zone PO 1.1 is considered to be satisfied.

Turning now to Zone PO 1.2, which is an assessment of the impacts of the proposed land use on the adjacent neighbourhood zone. The most likely of these impacts would be as a result of noise from children, passenger vehicles and service vehicle attendance, as well as general impacts to traffic management along Womma Road. The potential traffic impacts will be discussed later in this report.

The proposed hours of operation for the child care facility are 6:30am to 6:30pm, Monday to Friday and closed on weekends. Deliveries and waste collection to occur between 7:00am and 7:00pm on weekdays. There is approximately 65m between the nearest sensitive receiver and the closest proposed outdoor play area. Between these points is a proposed parking area, Womma Road, a large road reserve, and another local road (Hume Circuit). This separation is considered to be large enough that any

noise from children is unlikely to result in unreasonable loss of acoustic amenity by the residential land uses. This is particularly true as the noise created by vehicles travelling on Womma Road, which is an arterial road, would be louder and nearer to these residential land uses than any noise from a child care facility. It is not considered that the noise from waste collection vehicles or from passenger vehicles accessing the site would be greater than the Womma Road traffic either. As such it is considered that the proposed land use would not result in adverse impacts to the adjacent neighbourhood type zone and Zone PO 1.2 is satisfied.

Overall, the proposed land use is unlikely to result in impacts to envisaged and existing land uses in either zone and is moderately compatible with the higher impacting land uses expected in the Zone and so is acceptable.

7.3 Out of Activity Centre Development

Aside from the above, the subject land is also located outside of an Activity Centre, as defined in the Code. Figure 5 (below) shows the location of Activity Centres within the area, with the major centres being Elizabeth Shopping Centre and Munno Para Shopping City.

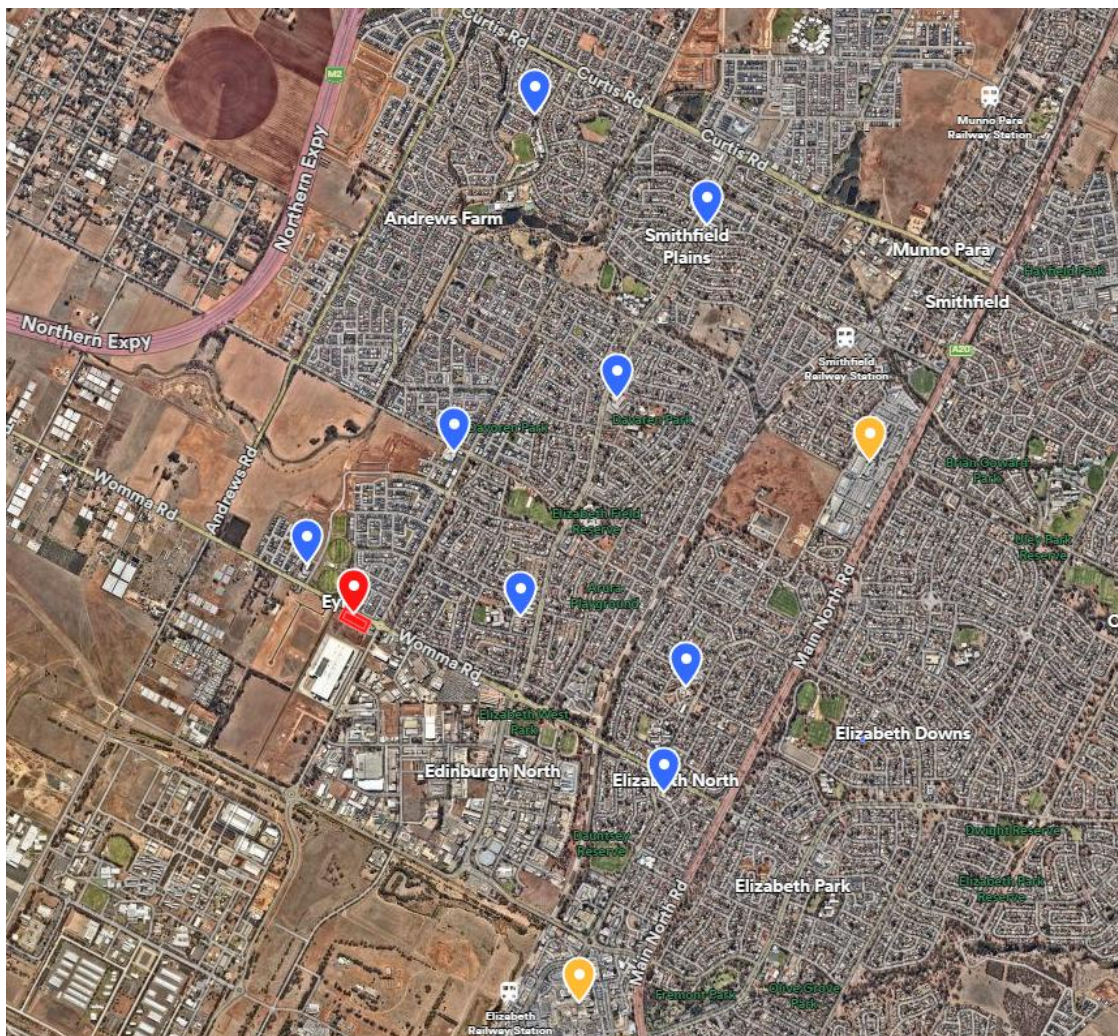


Figure 5: Location of all Activity Centres border by Curtis Road and Main North Road, with the subject site shown in Red, major centres in Yellow and other centres in Blue

Out of Activity Centre Development (OACD) PO 1.1 states the following:

Non-residential development outside Activity Centres [should be] of a scale and type that does not diminish the role of Activity Centres:

- a) *as primary locations for shopping, administrative, cultural, entertainment and community services*
- b) *as a focus for regular social and business gatherings*
- c) *in contributing to or maintaining a pattern of development that supports equitable community access to services and facilities.*

Further, Out of Activity Centre Development PO 1.2 states:

Out-of-activity centre non-residential development complements Activity Centres through the provision of services and facilities:

- a) *that support the needs of local residents and workers, particularly in underserved locations*
- b) *at the edge of Activities Centres where they cannot readily be accommodated within an existing Activity Centre to expand the range of services on offer and support the role of the Activity Centre.*

It is considered that the proposed land use is not one that would facilitate social or business gatherings as the intention is for parents to drop off their children and move away from the site relatively quickly.

As such is it not considered to be a location that encourages shopping or entertainment activities. It would also be an additional service for workers in the area with children needing care during working hours and so overall the proposal is considered to satisfy OACD PO 1.1 and 1.2, and the role of Activity Centres in the area should not be unreasonably compromised.

7.4 Built Form, Visual Appearance and Landscaping

Zone PO 3.1 requests that:

Development includes distinctive building, landscape and streetscape design to achieve high visual and environmental amenity particularly along arterial roads, zone boundaries and public open spaces.

Also, as the land is located on a boundary with a neighbourhood-type zone, PO 3.2 is also applicable;

Building facades facing a boundary of a zone primarily intended to accommodate sensitive receivers, a public road, or public open space incorporate design elements to add visual interest by considering the following:

- a) *using a variety of building finishes*
- b) *avoiding elevations that consist solely of metal cladding*
- c) *using materials with a low reflectivity*
- d) *using techniques to add visual interest and reduce large expanses of blank walls including modulation and incorporation of offices and showrooms along elevations visible to a public road.*

The design of the proposed building is considered to be relatively contemporary and is similar in architectural style to other such facilities constructed within the northern suburbs. There is not a great amount of modulation or articulation in the facade of the

building, but there is a variety of building materials shown as well as various textures and a large porch structure over the front entrance. These techniques are considered to be sufficient as to adequately avoid large expanses of blank walls, and there is sufficient visual interest when viewed from the Womma Road frontage. As such, it is considered that Zone PO 3.2 is satisfied, and the proposal demonstrates satisfactory visual amenity in regard to its built form.

In regard to landscaping, Zone PO 5.1 requests that:

Landscaping is provided along public roads and thoroughfares and zone boundaries to enhance the visual appearance of development and soften the impact of large buildings when viewed from public spaces and adjacent land outside the zone.

The Applicant has provided a landscaping plan that shows a variety of ground cover, shrubs and small bushes, which is considered to be a suitable treatment that would adequately enhance the visual appearance of the site. The landscaping plan reflects a site layout for a previous iteration of the proposed land use though and does not accurately reflect the areas that would need to be landscaped in the event the current proposal was granted Consent.

The Applicant has requested that the provision of an updated landscaping plan be a Reserved Matter. It is considered that this would be acceptable as the area to be landscaped would be in front of the development relative to the arterial road and residential area. Therefore, as long as appropriate plantings were maintained in the updated design, it is considered that Zone PO 5.1 would be reasonably satisfied, and subsequently, Zone PO 3.1 would also be satisfied.

Zone PO 3.3 states:

Buildings [should be] set back from the primary street boundary to contribute to a consistent streetscape.

The associated DPF 3.3 recommends a minimum setback of 8m in cases where there are no buildings on abutting sites and the proposed building is less than 6m high, which is applicable in this case as the overall height is proposed to be 5m. The building is proposed to have a setback to the Womma Road frontage of 26m, which greatly exceeds the recommended minimum. The nearest existing building that also has a frontage to the southern side of Womma Road is the McDonalds, which has a front setback of approximately 20m. As such it is considered that the proposed setback would result in a consistent streetscape and Zone PO 3.3 is satisfied.

Zone PO 4.1 recommends that:

Buildings mitigate visual impacts of building massing on residential development within a neighbourhood-type zone.

The building is proposed to be single storey in nature and so should have very little visual dominance within the locality when considering the significant separation from the nearby residential land uses. The associated DPF 4.1 outlines a 45-degree plane within which the buildings should be contained (see Figure 6, below). The proposal comfortably fits within this and so meet the DPF and satisfies PO 4.1.

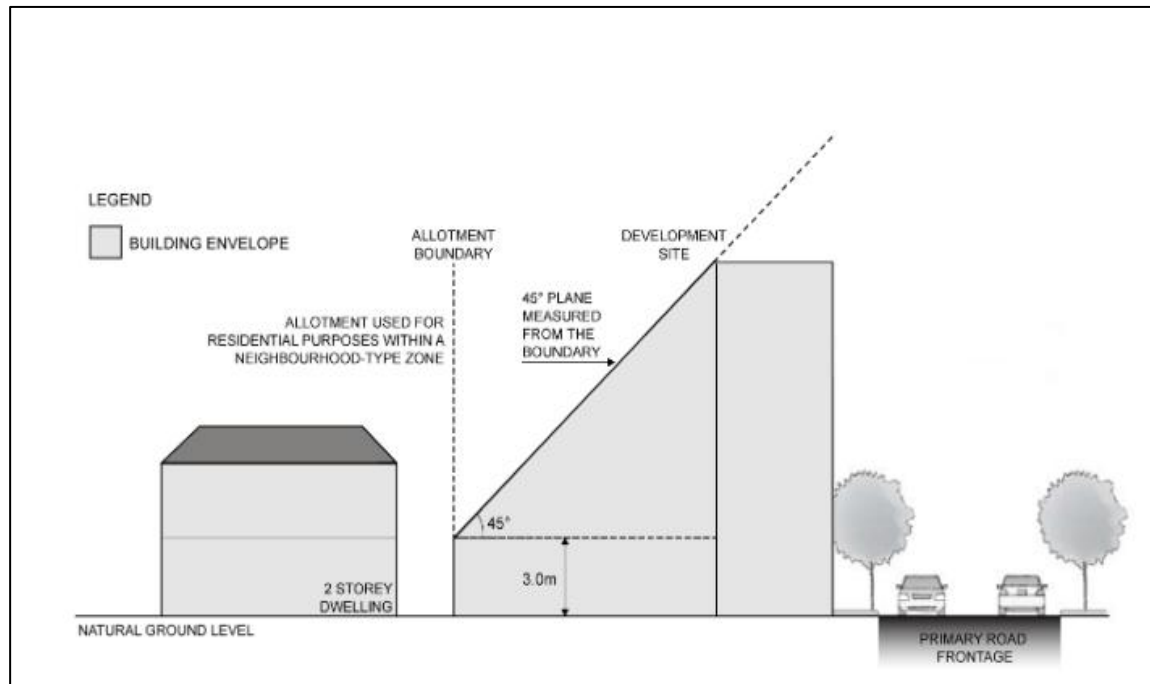


Figure 6: Diagram showing 45-degree plane

Overall, the visual appearance, built form and setbacks of the proposed building is considered to be acceptable within the locality.

7.5 Parking, Access and Pedestrian Movement

Transport Access and Parking (TAP) PO 5.1 recommends the following:

Sufficient on-site vehicle parking and specifically marked accessible car parking places [should be] 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.*

As a guide, the associated DPF 5.1 recommends that parking be provided at a rate outlined in Transport Access and Parking Table 1. For child care facilities, a parking rate of 0.25 spaces per child is recommended, or one (1) space per four (4) children. As the capacity of the child care facility is proposed to be 119 children, 30 parking spaces should be provided on site. The proposal includes provision for 28 parking spaces, resulting in a shortfall of two (2) spaces. However, advice provided by the Applicant's traffic consultant (see Attachment 6) indicates that a more accurate rate based on previous facilities is one (1) space per 4.2 children, which would result in a theoretical parking demand of 28.33 spaces, or 29 when rounded up to the nearest whole number, which would still lead to a shortfall of one (1) space.

The proposal does not involve a Heritage Place and is not part of a mixed-use development involving residential land uses and so PO 5.1 c) and d) are not considered applicable justifications for a reduced parking rate.

It is also unlikely for on-street parking to be available on Womma Road due to the works that would be required as a result of any road widening and to accommodate the proposed access point as well as those of the proposed development on the adjoining site (under application 24042350). However, there is a high likelihood that the proposed land use would utilise shared access arrangements with the other development proposed on the adjoining site and so there would be opportunities for shared use of parking areas to accommodate for a shortfall of one (1) space.

TAP PO 6.4 states that:

Pedestrian linkages between parking areas and the development [should be] provided and [should be] safe and convenient.

Pedestrian pathways are proposed between this development and the adjoining proposal (application 24042350) such that there should be reasonably convenient movement between the two (2) in the event that the use of other parking areas was required. Further, the proposal indicates the location of a shared path in the road widening area, which connects to the one indicated under the other development application and would be delivered in collaboration with the DIT. Inside the site itself, the pedestrian movements are reasonably safe and convenient. Overall, it is considered that there would be sufficient provision of parking and adequate pedestrian linkages through the overall development.

The proposal would involve the construction of a new access point on to Womma Road, which is a State maintained road, and the site is within the Major Urban Transport Routes (MUTR) Overlay. For these reasons, the application was referred to the Commissioner for Highways via the DIT for direction.

The provisions of the MUTR Overlay call for access points to be designed to facilitate safe entry and exit (PO 1.1), avoid queuing on main roads (PO 1.1, 2.1) and be able to accommodate the expected demand (PO 3.1). DIT reviewed the design of the proposed access point and determined that it was sufficient to accommodate the expected vehicle movements and subsequently resolved to support the proposed development, subject to eight (8) conditions. The Applicant agreed to the conditions directed by DIT and also to work with DIT for the delivery of the shared path across the front of this site and that of application 24042350. The application was also reviewed by Council's Traffic Engineers, who did not raise any concerns over the designs of the access point or manoeuvring areas. It was noted that the initial waste collection area would have resulted in the waste collection vehicle blocking the parking area, which would have greatly increased the potential of vehicles queuing on Womma Road. The application was subsequently amended to have the bins wheeled to the shared driveway south of the entrance to the facility car park and collected there, which is considered to be appropriate.

It is therefore considered that the access point and manoeuvring areas are designed appropriately and the relevant provisions of the MUTR Overlay are satisfied.

7.6 Advertisements

The application proposes signage in association with the proposed land use in the form of illuminated fascia signs and a free-standing blade sign near the front of the site. The free-standing sign would have a height of 4.6m above ground and is not proposed to be internally illuminated. Zone PO 7.1 recommends that:

Freestanding advertisements do not create a visually dominant element within the locality.

The associated DPF 7.1 recommends that freestanding advertisements be no higher than 6m above ground and have a face that does not exceed 8m².

As the proposed sign would have a height of 4.6m and an advertisement area of approximately 6.4m², it comfortably meets this DPF. It is also lower than the associated building and would be much lower than the existing signage in the locality and those proposed under the other development application (24042350). The existing free-standing signs associated with the McDonald's and the retail fuel outlet are 8.5m and 10m high respectively, while those proposed under application 24042350 would also be 8.5m high. There are also large stobie poles that run along the front of the Womma Road frontage that are much taller than any of the signage in the area and those proposed and would be more visually dominant. The sign proposed under this application would be located 7.8m from the front boundary of the site and given this and its height compared to other advertisements and structures in the locality is not considered to create a visually dominant element and so Zone PO 7.1 is satisfied.

The signage proposed on the fascia of the building do not project outside of the extremities of the building and so are considered to maintain an orderly appearance. Advertisements PO 1.1 recommends that advertisements be compatible and integrated with their associated building and it is considered that the proposal satisfies this. Overall, the proposed advertisements and signage are considered to be acceptable within the locality and the site generally.

7.7 Site Contamination

Site Contamination PO 1.1 states:

Ensure land is suitable for use when land use changes to a more sensitive use.

The application is for a more sensitive land use as defined in *Practice Direction 14* due to the fact that the land is currently vacant.

As such, a Preliminary Site Investigation as provided by the Applicant that identified that the potential for site contamination existed as a result of a Class 1 or 2 activity (see Attachment 7). These activities were identified as historical horticultural uses on the land itself and a service station on adjacent land. The application therefore required referral to the EPA. The EPA determined that it had been demonstrated through the submission of a Construction Environmental Management Plan (CEMP) that the land could be made suitable for the intended use and so supported the proposed development with one condition. As such, it is considered that the proposal satisfies Site Contamination PO 1.1.

8. Conclusion

The merits of the proposal to construct a child care facility with associated advertisements is considered to be finely balanced and ultimately comes down to whether the land use is compatible with the envisaged higher-impacting land uses of the Zone. The proposal would not prejudice nearby Activity Centres and is unlikely to result in adverse impacts to the adjacent residential land uses, nor would it unduly impede upon employment generating land uses that might be established in the vicinity.

It has been sufficiently demonstrated that land uses envisaged in the Zone would likely not result in unreasonable impacts to the amenity of the proposed sensitive receiver provided the suitable acoustic treatments are incorporated. As such, it can reasonably be said that the proposal is compatible and therefore is a land use that is acceptable in the proposed location. Therefore, based on an on-balance assessment of the proposal against the relevant Provisions of the Code, the proposal exhibits sufficient merit to warrant Planning Consent, subject to conditions.

9. Recommendation

STAFF RECOMMENDATION

It is therefore recommended that the Council Assessment Panel:

1. DETERMINES that the proposed development is not seriously at variance with the policies in the *Planning and Design Code*; and
2. GRANTS Planning Consent to the application by Leyton Property Pty Ltd for a child care facility with associated car parking, landscaping and illuminated signage including a pylon sign to 4.6m height, at 17 Stebonheath Road, Edinburgh North, as detailed in application ID 25005488, with the following conditions:

Conditions:

1. The development shall be undertaken, completed and maintained in accordance with the plan(s) and information detailed in this Application except where varied by any condition(s) listed below:
2. The hours of operation of the land use approved herein shall not exceed the hours of 6:30am to 7:00pm on weekdays and the land use shall not be in operation on weekends.
3. The premises shall be kept tidy and all buildings, fences, landscaping and paved or sealed surfaces shall be maintained in good condition at all times.
4. All off-street carparking spaces shall be linemarked, in accordance with the approved plans and Australian Standards AS 2890.1:2004 and 1742.2.2009. The linemarking, signposting and directional arrows shall be maintained to a clear and visible standard at all times.
5. A 150mm kerb shall be constructed to separate carparking spaces and driveways from landscaping areas and other open portions of the subject land.
6. All planting and landscaping identified on the plans submitted with the application shall be completed in the first planting season concurrent with or following commencement of the land uses approved herein. Such planting and landscaping shall not be removed nor the branches of any tree lopped and any plants which become diseased, or die shall be replaced by suitable species.
7. No more than 119 children and 25 staff shall be present on the premises at any one time.
8. Prior to the first operation of the land use, all acoustic treatments delineated on the site plan approved herein and all recommendations set out in the Environmental Noise Assessment prepared by Echo Acoustic Consulting, dated 27 August 2025, Ref. 749-4, shall be in place.

Commissioner of Highways Conditions:

9. All access to/from the development shall be gained in accordance with the Site and Floor Plan produced by BELL Architecture, Drawing No. DD0002, Rev. D, Dated 26.02.2025.
10. The access to Womma Road shall be in accordance with DA 2402350. All works associated with the access points shall be completed prior to the operation of the development.

11. In the event that Womma Road is widened and the operation of the access to the subject development from the main internal circulation aisle shall be reviewed to ensure that vehicles turning right into the subject development do not affect the free flow of traffic into the site. This may require the restriction of right turns into the subject development from the main internal circulation aisle.
12. The first two car parking spaces adjacent to the access to the main internal circulation aisle shall be limited to staff parking only. These spaces shall be signed/linemarked to reinforce their operation.
13. Any infrastructure within the road reserve that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the Applicant.
14. All parking shall be designed and constructed in accordance with AS/NZS 2890.1:2004 and AS/NZS 2890.6:2022 with all commercial vehicle facilities being designed in accordance with AS2890.2-2018.
15. Prior to commencement of construction a final stormwater management plan (including DRAINS modelling) shall be developed in conjunction with DIT and Council and be in accordance with DIT Master Specification RD-DK-D1 Road Drainage Design and other relevant guidelines. The point/s of discharge shall be confirmed and the pre and post development peak discharge to any DIT infrastructure is to be confirmed during detailed design. All drainage infrastructure is to be to the satisfaction of DIT and Council.
16. No stormwater from this development is permitted to discharge on-surface to Womma Road. In addition, any existing drainage of the road shall be accommodated by the development and any alterations to road drainage infrastructure as a result of this development shall be at the expense of the developer.

Environment Protection Authority Conditions:

16. A Certificate of Occupancy must not be granted in relation to a building on the relevant site until a statement of site suitability (in the form described by Practice Direction 14: Site Contamination Assessment 2021) is issued by a site contamination consultant certifying the land is suitable for the proposed use.

Development Locations

Location 1

Location reference

17 STEBONHEATH RD EDINBURGH NORTH SA 5113

Title Ref

CT 6246/490

Plan Parcel

D124140 AL204

Additional Location Information**Council**

CITY OF PLAYFORD

Zone Overlays

Zones

- Strategic Employment

Sub-zones

(None)

Overlays

- Building Near Airfields
- Defence Aviation Area
- Future Road Widening
- Hazards (Flooding)
- Hazards (Bushfire - Urban Interface)
- Hazards (Flooding - General)
- Major Urban Transport Routes
- Prescribed Wells Area
- Regulated and Significant Tree
- Traffic Generating Development
- Water Resources

Variations

- Concept Plan (Concept Plan 81 - Edinburgh Defence Airfield Lighting Constraints)

Application Contacts

Applicant(s)

Stakeholder info

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Contact

Stakeholder info

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Invoice Contact

Stakeholder info

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5000
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hamish@leytonproperty.com.au

Land owners

Stakeholder info

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Torrensville
SA
5031
Tel. 0417 846 687
hamish@leytonproperty.com.au

Nature Of Development

Nature of development

Construction of a Child Care Facility with associated car parking, landscaping and signage.

Development Details

Current Use

Vacant

Proposed Use

Child Care Facility

Development Cost

\$1,200,000.00

Proposed Development Details

Construction of a Child Care Facility with associated car parking, landscaping and signage.

Element Details

You have selected the following elements

Child Care Facility - \$0.00

Regulated and Significant Trees

Does the application include any works that will result in damage (includes impacts to roots and pruning) or removal to regulated or significant tree(s)?

No

Septic/Sewer information submitted by applicant

Does this development require a new septic system or amendment to an existing septic system? i.e. septic tank and / or wastewater disposal area?

No

Certificate of Title information submitted by applicant

Does the Certificate of Title (CT) have one or more constraints registered over the property?

Unsure

Consent Details

Consent list:

- Planning Consent
- Building Consent

Have any of the required consents for this development already been granted using a different system?

No

Planning Consent

Apply Now?

Yes

Who should assess your planning consent?

Assessment panel/Assessment manager at City of Playford

If public notification is required for your planning consent, who would you like to erect the public notification sign on the land?

Relevant Authority

Building Consent

Do you wish to have your building consent assessed in multiple stages?

No

Apply Now?

No

Consent Order

Recommended order of consent assessments

1. Planning Consent

Do you have a pre-lodgement agreement?

No

Declarations

Electricity Declaration

In accordance with the requirements under Clause 6(1) of Schedule 8 of the Planning, Development and Infrastructure (General) Regulations 2017, the proposed development will involve the construction of a building which would, if constructed in accordance with the plans submitted, not be contrary to the regulations prescribed for the purposes of section 86 of the Electricity Act 1996.

Submission Declaration

All documents attached to this application have been uploaded with the permission of the relevant rights holders. It has been acknowledged that copies of this application and supporting documentation may be provided to interested persons in accordance with the Act and Regulations.

Documents

Document	Document Type	Date Created
250226_Lodgement Pack.pdf	All application documentation	27 Feb 2025 11:03 AM
LWC GK- 16 PSI_ Steboneath Road Edinburgh North_ FR002 comp.pdf	All application documentation	27 Feb 2025 11:03 AM
Appendix I_ Aerial imagery.pdf	All application documentation	27 Feb 2025 11:03 AM
LWC GK- 16 PSI_ Appendix K.pdf	All application documentation	27 Feb 2025 11:03 AM

Application Created User and Date/Time

Created User

epn.withersg@sa.gov.au

Created Date/Time

27 Feb 2025 11:03 AM

FOR APPROVAL

ISSUE	DATE	DESCRIPTION	ISSUED BY
1	01.09.2024	PROPOSED AMENDMENT	WKL
2	27.08.2023	FENCE TYPES	WKL
3	06.09.2023	PROPOSED AMENDMENTS	WKL
4	18.06.2023	FOOTPATH ADDED	WKL
5	19.05.2023	DRIVEWAY CHANGES	WKL
6	05.04.2023	DRIVEWAY LOCATION & DETAIL	WKL
7	24.02.2023	WOMMA ROAD SIGNAGE	WKL
8	05.02.2023	CONCRETE FENCE ON HIGHWAY	WKL

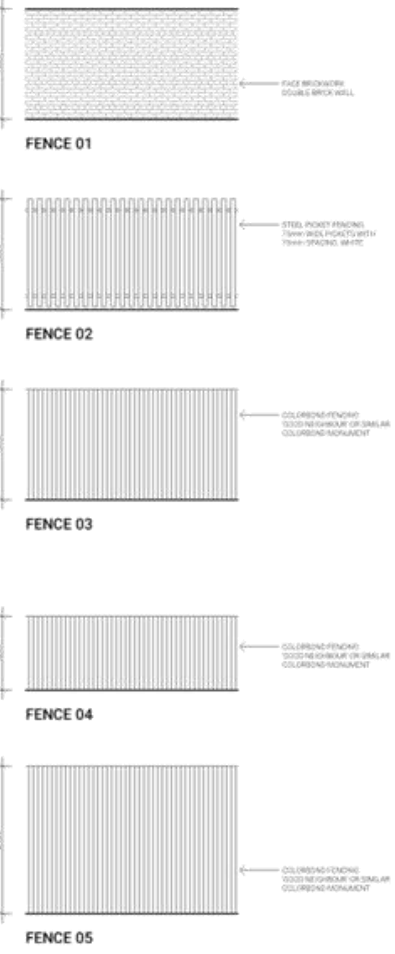


CLIENT
LEYTON PROPERTY

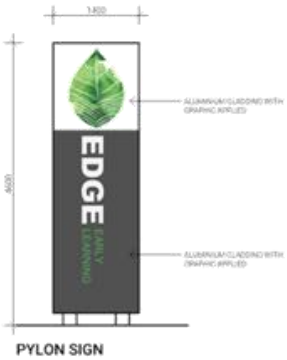
ARCHITECT
BELL Architecture
Level 1, 14 Esplanade Place, Adelaide 5000 PO Box 1039 Rundle Mall SA 5000 P +61 8 8273 3870



JOB TITLE WOMMA ROAD DEVELOPMENT		CLIENT LEYTON PROPERTY	
DRAWING SCALE: @ A1 As indicated		DRAWING NO DD0002	
DRAWN BY WK		CHECKED BY WK	
JOB NO A240125		REVISION J	



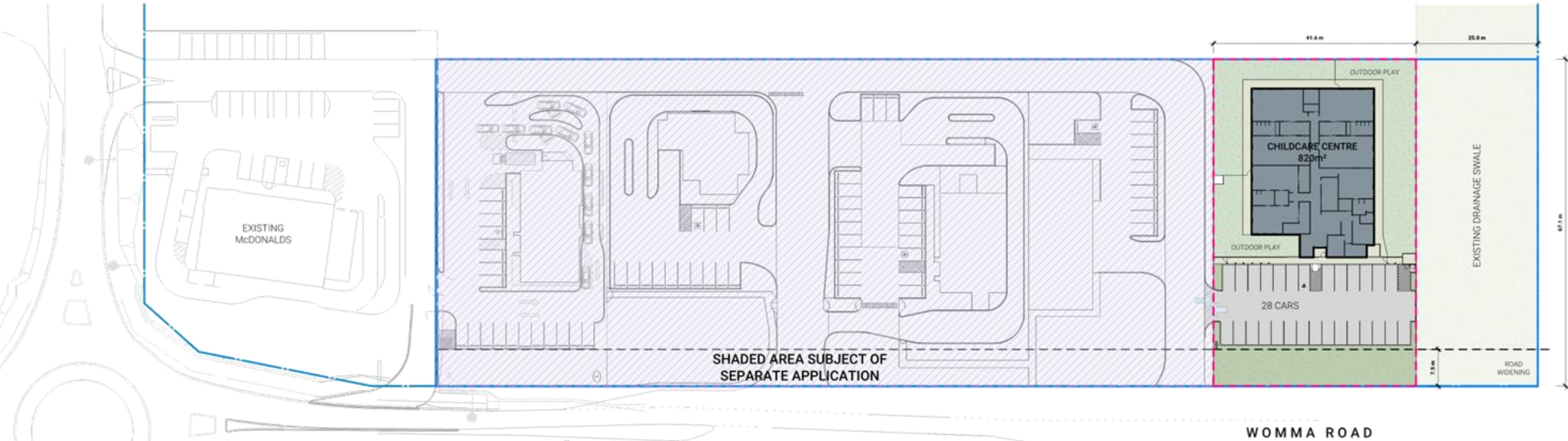
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PYLON SIGN
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PROPOSED CHILDCARE CENTRE

WOMMA ROAD, EDINBURGH NORTH
PLANNING APPLICATION DOCUMENTATION
FEBRUARY 2025



DA-MASTERPLAN
1:400@A1



ARTISTS IMPRESSION

- PROPOSED SITE LEGEND
- OVERALL SITE BOUNDARY
 - CHILDCARE CENTRE SITE 2794m²
 - SHARED DRIVEWAY
 - CARPARKS
 - LANDSCAPE AREAS
 - FOOTPATHS

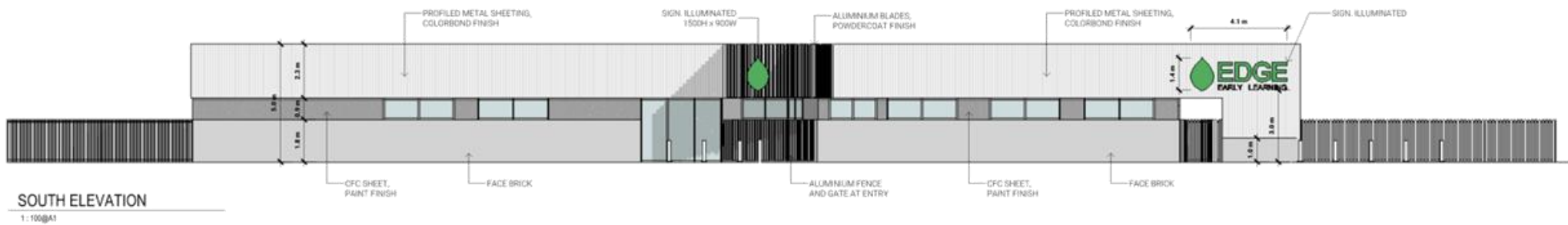
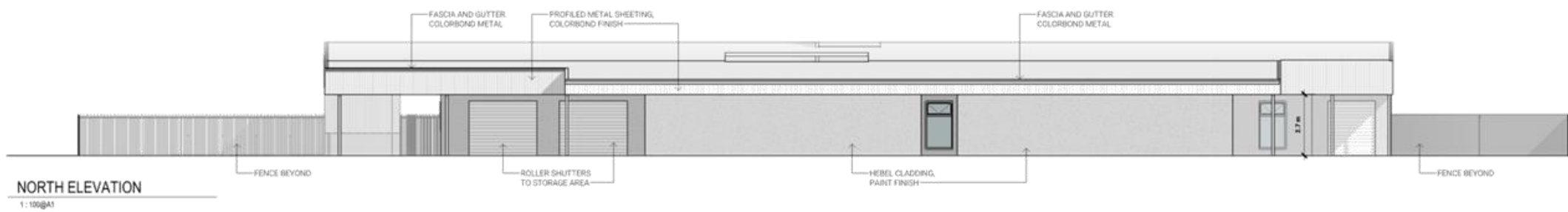
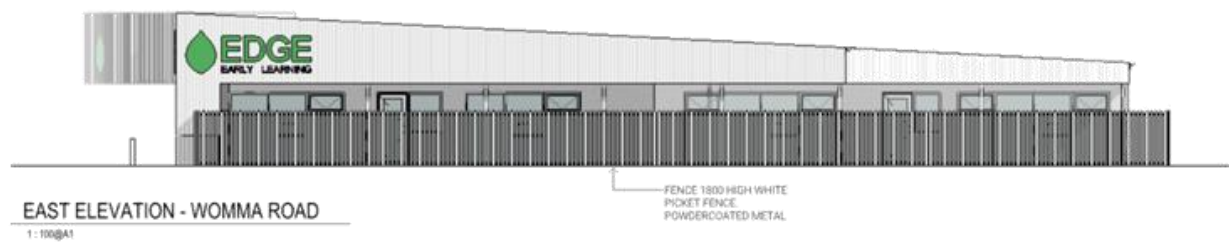
FOR APPROVAL			
NO	DATE	DESCRIPTION	ISSUED BY
01	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
02	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
03	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
04	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
05	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
06	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
07	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
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18	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
19	10/02/2025	FOR PRELIMINARY APPROVAL	WJ
20	10/02/2025	FOR PRELIMINARY APPROVAL	WJ



CLIENT
LEYTON PROPERTY

ARCHITECT
BELL Architecture
Level 1, 14 Edinburgh Place, Adelaide 5000 PO Box 1039 Rundle Mall SA 5000 P 461 8 8373 3870

JOB TITLE				DRAWING TITLE			
WOMMA ROAD DEVELOPMENT				CHILDCARE - MASTERPLAN			
0m 8m 15m 24m 32m 40m							
JOB NO	DRAWING SCALE @ A1	DRAWN BY	CHECK BY	DRAWING NO	REVISION		
A240125	As indicated	WK	WK	DD0001	D		

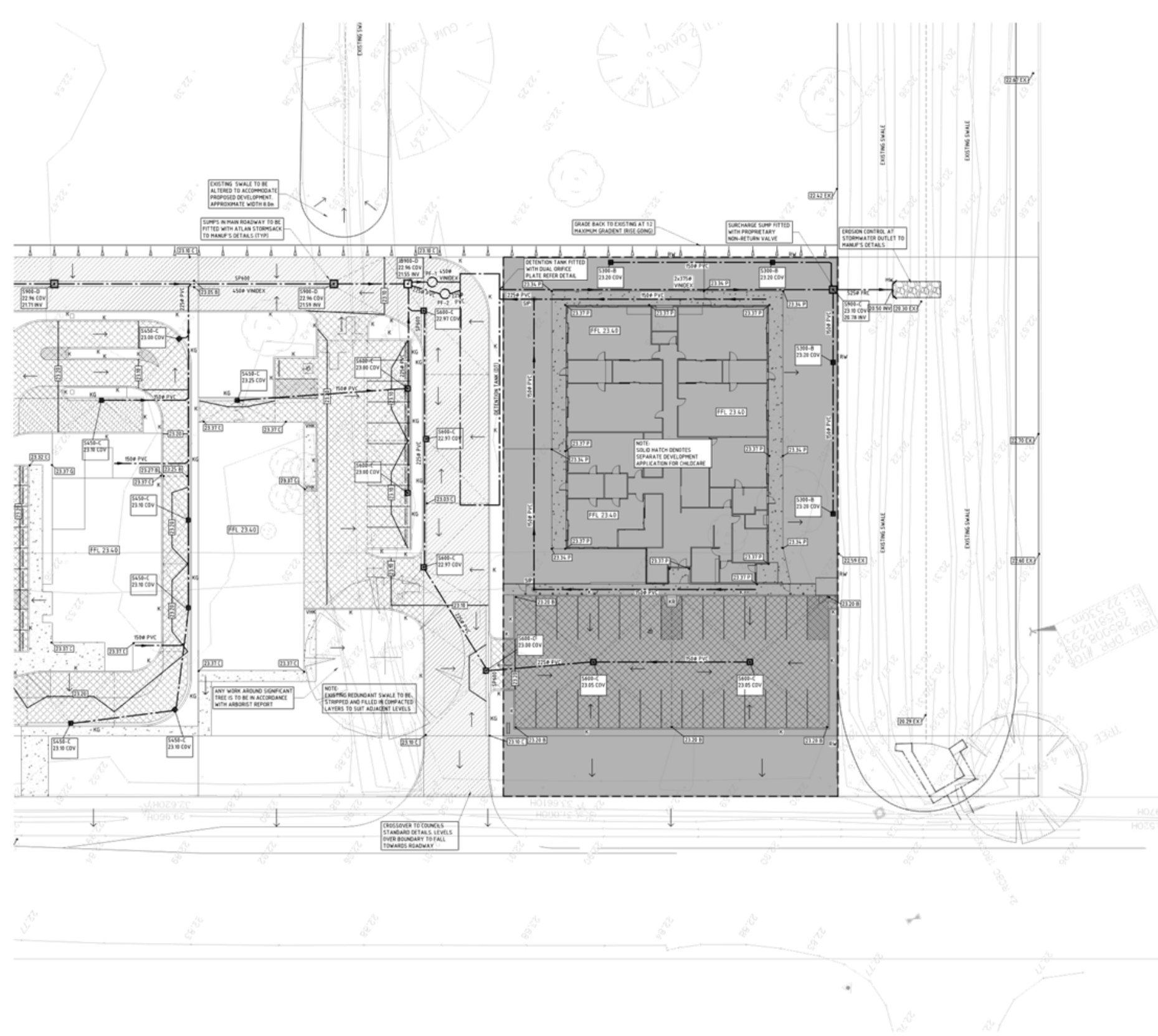


FOR APPROVAL			
ISSUE	DATE	DESCRIPTION	REVISION
1	10/10/2024	CLIENT APPLICATION/ASSESSMENT	1

CLIENT
LEYTON PROPERTY

ARCHITECT
BELL Architecture
Level 1, 141 Esplanade Place, Adelaide 5000 PO Box 1039 Pundah Maf SA 5000 P 461 8 8373 3870

JOB TITLE WOMMA ROAD DEVELOPMENT				DRAWING TITLE ELEVATIONS	
0m 2m 4m 6m 8m 10m					
JOB NO A240125	DRAWING SCALE @ A1 1 : 100	DRAWN BY WK	CHECKED BY WK	DRAWING NO DD0003	REVISION A



- LEGEND**
- SEWER GRADE STORMWATER PIPE SIZE AND TYPE AS NOTED
 - S400-X 180 SQUARE GRATED SUMP GRATE CLASS AS NOTED
 - S400-X 180 SQUARE JUNCTION BOX COVER CLASS AS NOTED
 - S400-X 400 SQUARE GRATED SUMP GRATE CLASS AS NOTED
 - S400-X 400 SQUARE GRATED SUMP GRATE CLASS AS NOTED
 - DP DOWNPIPE ALL DOWNPIPES FOR SEALED SYSTEM ARE TO BE PVC
 - SP SITE INSPECTION POINT
 - PP-1 ATLAN VORTEXFORM SVLOS (OR EQUIVALENT) INSTALLED STRICTLY IN ACCORDANCE WITH THE MANUP'S REQUIREMENTS
 - PP-2 ATLAN FLOWPIT (OR EQUIVALENT) INSTALLED STRICTLY IN ACCORDANCE WITH THE MANUP'S REQUIREMENTS
 - HW PRECAST CONCRETE HEADWALL
 - DESIGN LEVEL: CONCRETE, GRASS, SAND, GRAVEL, COV, WATER, EX - TO MATCH EXISTING LEVEL
 - CONTOUR LINE
 - DIRECTION OF SURFACE FALL
 - GRADE LINE
 - SP400 400 WIDE CONCRETE SPREAD DRAIN
 - RW RETAINING WALL TO FUTURE DETAILS
 - DT 180 DIA. MODULA BOX CULVERT DETENTION TANK STRICTLY IN ACCORDANCE WITH MANUP'S DETAIL. MINIMUMS: MINIMUM 1.0M DEEP. PROVIDE INSPECTION OPENING STRICTLY IN ACCORDANCE WITH MANUP'S DETAIL. PROVIDE BREAKTHRU VALVES TO ENSURE ADEQUATE VENTING OF AIR WITHIN TANK.
 - 150 THICK CONCRETE SLAB WITH 50/50 MESH TOP & BOTTOM IN25 CONCRETE ON 150 THICK COMPACTED QUARRY RUBBLE (PMD/2000)
 - 150 THICK CONCRETE SLAB WITH 50/50 MESH TOP IN25 CONCRETE PROVIDE TYPICAL CONTROL JOINTS AT 3.0M MAX. C/C
 - 35MM THICK HOTROL BITUMEN ON 100 THICK FINE CRUSHED ROCK (PMD/2000) / PMD/1000 ON 150 THICK COMPACTED QUARRY RUBBLE (PMD/2000)
 - 150 THICK CONCRETE SLAB WITH 50/50 MESH TOP IN25 CONCRETE ON 150 THICK COMPACTED QUARRY RUBBLE (PMD/2000)

NOTE:
DRAWINGS SHALL BE READ IN CONJUNCTION WITH ALL OTHER CONSULTANTS' DRAWINGS AS A PACKAGE. REFER TO ARCHITECT'S DRAWINGS FOR ALL SETOUT DIMENSIONS.
ALL LEVELS SHALL BE CONFIRMED ON SITE PRIOR TO CONSTRUCTION. SHOULD ANY DISCREPANCY OCCUR THE CONTRACTOR SHALL CONTACT THIS OFFICE IMMEDIATELY FOR FURTHER INSTRUCTION.

CONTRACTORS NOTES:
COVER LEVELS GIVEN FOR PITS ARE NOMINAL ONLY. COVER LEVELS SHALL MATCH FINISHED PAVING LEVELS.
WHERE EXISTING SERVICE COVERS ARE FOUND WITHIN THE SCOPE OF THE NEW WORKS, THE CONTRACTOR MUST ALLOW TO ADJUST THE COVERS TO SUIT THE PROPOSED FINISHED SURFACE LEVEL.
THE CONTRACTOR IS RESPONSIBLE FOR CHECKING LOCATION OF ALL UNDERGROUND SERVICES PRIOR TO COMMENCING ANY EXCAVATION WORK. ANY DAMAGE CAUSED TO ANY SERVICES SHALL BE REPORTED IMMEDIATELY TO THE SUPERINTENDENT & SHALL BE REPAIRED BY THE APPROPRIATE AUTHORITIES. ALL COSTS ASSOCIATED WITH REPAIRS SHALL BE AT THE CONTRACTOR'S EXPENSE. PHONE DIAL BEFORE YOU DIG OTHER FOR ASSETANCE.
WHERE PROPRIETARY ITEMS ARE SPECIFIED, ALTERNATE EQUIVALENT PRODUCTS MAY BE ADOPTED WITH THE PRIOR WRITTEN APPROVAL OF THIS OFFICE.



structural • civil • engineers

Date	Revision	Issue
11/02/2021	ISSUED FOR PLANNING APPROVAL	C
16/02/2021	ISSUED FOR PLANNING APPROVAL	B
16/02/2021	ISSUED FOR PLANNING APPROVAL	A



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Designed	SR	Drawn	SR
Approved		Date	DEC 24
Civil		Sheet	2 of 3

Project
**PROPOSED DEVELOPMENT
CNR STEBBONHEATH ROAD
AND WOMMA ROAD
EDINBURGH NORTH**

Client
LEYTON PROPERTY

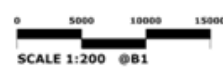
Drawing Title
**SITE LEVELS AND
DRAINAGE LAYOUT**

Drawing Number
24184-C02

Scale
1:200

Issue
C

PRELIMINARY



24ADL-1040
20 JUNE 2025

17 Stebonheath Rd, Edinburgh North

Child Care Facility



LEYTON PROPERTY GROUP



17 Stebonheath Rd, Edinburgh North

20 June 2025

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V1	09/12/24	M. Asser	C. Jurek	Initiation of report
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V3	17/06/25	M. Asser	M. King	Updated report



We acknowledge the Kurna 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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Executive Summary

Applicant:	Leyton Property Group
Property Location:	17 Stebonheath Road, Edinburgh North
Site Area:	2,785m ²
Council and Relevant Authority:	City of Playford
Planning and Design Code:	29 May 2025 – Version no. 2025.10
Zone:	Strategic Employment Zone
Overlays:	<ul style="list-style-type: none">• Building Near Airfields• Defence Aviation Area – All Structures over 15 metres• Future Road Widening• Hazards (Flooding)• Hazards (Bushfire – Urban Interface)• Hazards (Flooding – General)• Major Urban Transport Routes• Prescribed Wells Area• Regulated and Significant Tree• Traffic Generating Development• Water Resources
Concept Plan:	Concept Plan 81 – Edinburgh Defence Airfield Lighting Constraints
Current Land Uses:	Vacant
Description of Development:	Construction of a Child Care Facility with associated car parking, landscaping and illuminated signage.

1. Introduction

Leyton Property Group (the Applicant) has engaged URPS to provide this planning report in support of the proposed development at 17 Stebonheath Road, Edinburgh North.

The report provides an overview of the subject site and locality, details of the proposed development and an assessment against the relevant provisions of the Planning and Design Code (the Code).

The report is accompanied by:

- Development plans prepared by Bell Architecture.
- Civil and Stormwater Management Plan prepared by PT Design.
- Preliminary site investigations report prepared by LBW Co.
- Traffic and Parking Report prepared by MFY Pty Ltd.

2. Site and Locality

2.1 Subject Site

The subject site forms part of Lot 204 D142140 which is identified as 17 Stebonheath Road, Edinburgh North (CT6246/490 or Lot 204 D142140).

Lot 204 has a total area of approximately 8.2 hectares, while the site of the development comprises an area of approximately 2,785m² adjacent to the boundary with Womma Road.

Lot 204 is a square shaped allotment on the western side of the intersection of Womma Road and Stebonheath Road. The southern portion of the lot has been developed as part of Drakes Distribution Centre and includes a warehouse and associated car parking area. The north-eastern corner of Lot 204 has also recently been developed with a dine-in and drive-through takeaway restaurant (McDonalds) and car parking area accessible from Stebonheath Road.

The subject site is the northern-most portion of Lot 204. The site has a 41.6m frontage to Womma Road and a depth of 67.1m (see **Figure 1** below). There is a 12.6m-wide drainage reserve along the north-western boundary.

The subject site is generally flat with minimal vegetation. There are no Regulated or Significant trees within the subject site area.



Figure 1 – Aerial image showing subject site boundary

2.2 Locality

The subject site is positioned at the interface between residential and industrial zoned land. Land south of Womma Road is in the Strategic Employment Zone, while land to the north of Womma Road is in the Master Planned Neighbourhood Zone and subject to the Emerging Activity Centre Subzone (see **Figure 2** below).

As a result, the locality features two distinct characters – residential character to the north of Womma Road and an industrial character with emerging retail/commercial character to the south of Womma Road.

To the north-west of the site along Womma Road, works are being undertaken for the approved industrial land division. It is anticipated that this land will be developed with warehouses and similar commercial or industrial land uses into the future.

Land to the north of Womma Road is in the Master Planned Neighbourhood Zone. Residential development and associated public open space (Eyre Sports Park) has been established in the past decade, identified as the suburb of Eyre. The residential neighbourhood is accessible via Stebonheath Road and Edward John Parade which is adjacent to the subject site.

The Stebonheath Road and Womma Road intersection features a large roundabout with commercial uses on the southern corners (McDonalds and Liberty fuel outlet). Allotments to the east of this intersection feature well-established residential development within the suburb of Davoren Park.

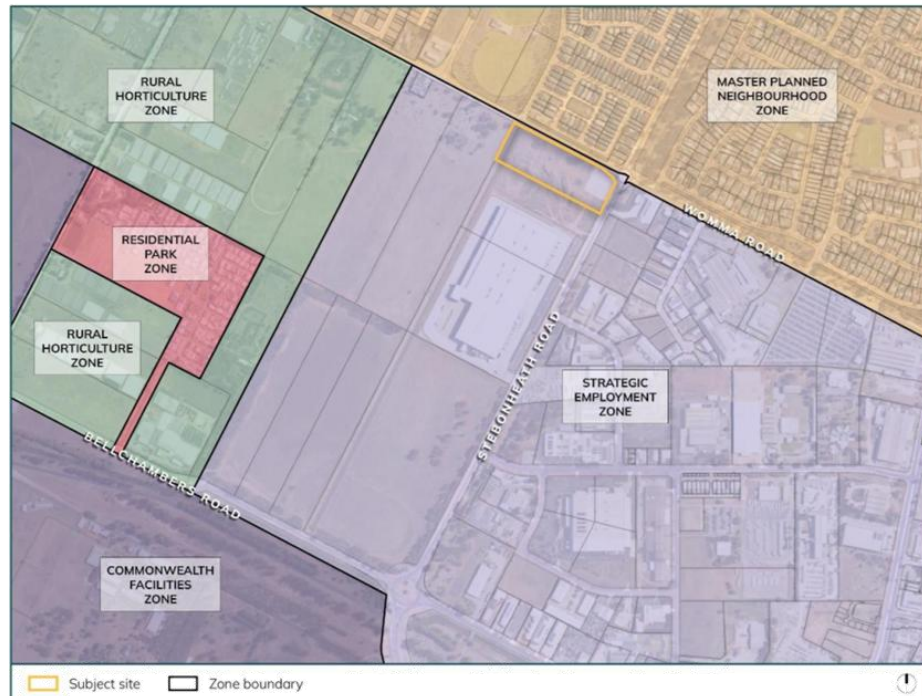


Figure 2 – Site location and Zone map

3. Proposed Development

3.1 Development Summary

The proposal seeks to construct a single-storey child care facility, see **Figure 3** below.

The facility will have a capacity of 119 children and 25 staff.

The child care facility will operate between 6.30am to 6.30pm Monday to Friday.

Part 7 of the Code provides the following definition:

Term	Definition
Child care facility	<i>Means a place primarily for the care or instruction of children of less than primary school age, children with special needs or out-of-school-hours care (including vacation care) and not resident on the site.</i>

The development will comprise the following:

- A single-storey building featuring seven indoor activity rooms, a staff room, administration areas and amenities.
- Three outdoor play areas.
- 28 at grade car parking spaces including one accessible space.
- Screened waste collection area.
- Signage including 4.6m pylon sign.
- Landscaping within the outdoor play areas, car parking area and frontage to Womma Road.
- Access to the facility will be via an approved access point via Womma Road.



Figure 3 – Proposed development site layout

4. Procedural Matters

4.1 Planning and Design Code

The site is in the Strategic Employment Zone.

The following Overlays in the Code apply to the site:

- Building Near Airfields
- Defence Aviation Area – All Structures over 15 metres
- Future Road Widening
- Hazards (Flooding)
- Hazards (Bushfire – Urban Interface)
- Hazards (Flooding – General)
- Major Urban Transport Routes
- Prescribed Wells Area
- Regulated and Significant Tree
- Traffic Generating Development
- Water Resources

The site is also subject to Concept Plan 81 – Edinburgh Defence Airfield Light Constraints identified within Part 12 – Concept Plans, Playford of the Code.

4.2 Assessment Pathway

The proposed development of a child care facility is not prescribed as “accepted”, “deemed to satisfy” or “restricted” development in the Strategic Employment Zone.

This means it is a “performance assessed” development pursuant to Section 170(1) the Act and it will be assessed on its merits against the relevant provisions of the Code.

4.3 Notification

Table 5 of the Strategic Employment Zone identifies classes of development that are excluded from notification.

No exemption is prescribed for the use and development of a child care facility. The application will therefore require public notification.

4.4 Referrals

4.4.1 Commissioner of Highways

The site is in the Future Road Widening Overlay. The Overlay provides that an application must be referred to the Commissioner of Highways where it involves development within, or which may encroach within, a Future Road Widening Area.

The application does not include building work within the 6m Consent Area established by the Overlay.

The site is also in the Major Urban Transport Routes Overlay. The Overlay provides that an application must be referred to the Commissioner of Highways where it changes the nature, volume or frequency of vehicular movements through an existing access.

The application does not propose a new access point to Womma Road, however the development would result in increased traffic movements and volumes through this access point.

For these reasons the application will be referred to the Commissioner of Highways.

4.4.2 Environmental Protection Authority

Practice Direction 14 (PD14) – Site Contamination Assessment 2021 provides Table 1 – Land Use Sensitivity Hierarchy Table to identify relevant levels of land use sensitivity. A child care facility is best described as an Educational premises class 1 use listed as Item 1 in the table. This is also identified as a sensitive use by PD14.

The site is vacant and has no current land use. PD14 guides that in these circumstances the proposed use will be taken to be a more sensitive use.

Part 9.1 (Part 9 – Referrals) of the Code establishes that a referral to the Environmental Protection Authority (EPA) for a change in use to a more sensitive use is only required where site contamination exists or may exist as a result of one of the following:

- Class 1 activity (including where a class 1 activity exists or previously existed on adjacent land).
- Class 2 activity and the proposed use is a sensitive use.

Educational premises class 1 uses are a sensitive use and a Preliminary Site Investigation (PSI) conducted by Land & Water Consulting (LWC) identified historical Class 1 activities on adjacent land.

This means the application will be referred to the EPA in accordance with the referral requirement of Part 9.1 of the Code.

5. Planning Assessment

The key planning considerations associated with the proposed development are:

- Land Use.
- Interface between Land Uses.
- Built Form and Character.
 - Façade Design and Detailing.
 - Building Setbacks.
- Advertising Signage.
- Proximity to Defence Aviation.
- Landscaping.
- Site Contamination.
- Stormwater Management and Flooding.
- Traffic, Access and Parking.
- Waste Management.

5.1 Land Use

The Strategic Employment Zone seeks:

- PO 1.1** *Development primarily for a range of higher-impacting land uses including general industry, warehouse, transport distribution and the like is supplemented by other compatible development so as not to unduly impede the use of land in other ownership in the zone for employment-generating land uses, particularly those parts of the zone unaffected by an interface with another zone that would be sensitive to impact-generating uses.*
- PO 1.2** *Development on land adjacent to another zone which is used for residential purposes incorporates a range of low-impact, non-residential uses to mitigate adverse amenity and safety impacts on the adjoining zone.*
- DPF 1.2** *Development involving any of the following uses on a site adjacent land in another zone used for or expected to be primarily used for residential purposes:*
- (a) *Bulky goods outlet*
 - (b) *Consulting room*
 - (c) *Indoor recreation facility*
 - (d) *Light industry*
 - (e) *Motor repair station*
 - (f) *Office*
 - (g) *Place of worship*

- (h) *Research facility*
 - (i) *Service trade premises*
 - (j) *Store*
 - (k) *Training facility*
 - (l) *Warehouse.*
- (Underlining added)

The primary role of the Zone is to provide a range of higher-impacting land uses including general industry, warehouse, transport distribution.

PO 1.1 advises however that this is to be “*supplemented by other compatible development so as to not impede the use of the land in other ownership....particularly those parts of the Zone unaffected by an interface with another Zone ...*”

The subject site has an interface with residential development in the Master Planned Neighbourhood Zone to the north of the site. This means the site is *affected* by the interface and development must be compatible with the sensitivity level of the other Zone. The provision of a child care facility on this land will provide a compatible relationship with this adjacent residential development while also providing an important and necessary service to the local community.

In other words, the adjacent residential land uses influence the suitability of land uses at the subject site as guided by the list contained within DPF 1.2. And while not directly anticipated, a child care facility is not unlike the many land uses guided in DPF 1.2, which include a place of worship, indoor recreation facility or training facility, a consulting room, and an office.

In our view, such a use is a suitably low-impact development that will not detract from the amenity of dwellings adjacent and will not cause adverse amenity and safety impacts to the dwellings in the Master Planned Neighbourhood Zone. Further, a child care use achieves the fundamental ‘Land Use and Intensity’ performance outcomes in PO 1.1 and 1.2 being a non-residential use that is low impact and compatible with adjacent residential dwellings (and in turn services their needs for child care facilities).

Further, development of this child care facility will occupy a minor 2,785m² or 0.058% of land within the Strategic Employment Zone. The scale and location of such development ensures it will not preclude development of “higher-impacting land uses” sought for the remaining portions of the Strategic Employment Zone, particularly those areas unaffected by an interface with another Zone.

5.2 Interface between Land Uses

The General Land Use Compatibility assessment provisions in the Interface between Land Use General Development Policy seeks:

- PO 1.1** *Sensitive receivers are designed and sited to protect residents and occupants from adverse impacts generated by lawfully existing land uses (or lawfully approved land uses) and land uses desired in the zone.*

A child care facility is defined as a sensitive receiver in the Code. Child care facilities of the standard proposed are commonly designed to ensure appropriate design quality and noise attenuation measures. This is standard practice.

The site's context also protects occupants of the child care facility because:

- Existing land uses within the Zone include existing retail (McDonald's) and warehousing (Drakes Distribution Centre), see **Figure 4** below. These uses will not compromise the on-going operation of the proposed facility, nor is the child care facility likely to compromise their operations.

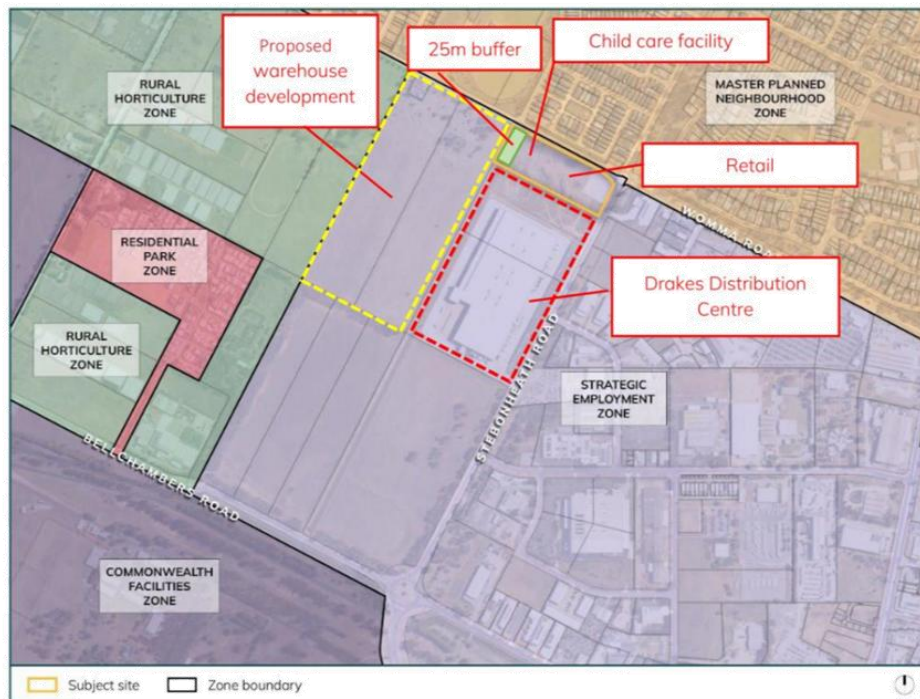


Figure 4 – Site location, zoning and surrounding land uses

- The child care facility is separated from undeveloped land within the Strategic Employment Zone by a 25 metre wide drainage swale. This provides a generous buffer to the neighbouring site to the north-west.
- While there are no existing land uses on land to the north-west of the site, we understand recent land division will support future development of warehouses (subject to development approval).

Beyond this, any lawful future land uses will also be informed by PO 1.2. Meaning any development on neighbouring land in the Strategic Employment Zone will need to be *“low-impact, non-residential uses*

to mitigate adverse amenity and safety impacts on the adjoining zone" to satisfy PO 1.2. This is to protect the adjacent residential land uses, but will also provide a highly moderated level of potential impact to the proposed child-care development.

Desired land uses which satisfy PO 1.2 will not pose undue impacts to the occupants of the child-care facility, nor will the child-care facility jeopardise land uses desired by the Zone. This is because they too will be low-impact uses which mitigate amenity and safety impacts to the Master Planned Neighbourhood Zone.

- The child care facility land use is acceptable given the site's context at the interface of the Master Planned Neighbourhood Zone and the wider Strategic Employment Zone and provides a comfortable land use transition between the residential neighbourhood on the northern side of Womma Road.
- The Strategic Employment Zone is almost wholly developed in this location, with most remaining lots located more than 480 metres to the south of the site - confirming that the opportunity to disrupt the Strategic Employment operations in the future is minimal.

The development of the proposed child care facility at the interface between land uses is appropriate on the basis of this context. Moreover, it's existence will not prejudice the operation of existing or envisaged future uses.

5.3 Built Form and Character

5.3.1 Façade Design and Detailing

The Strategic Employment Zone seeks:

- PO 3.1** *Development includes distinctive building, landscape and streetscape design to achieve high visual and environmental amenity particularly along arterial roads, zone boundaries and public open spaces.*
- PO 3.2** *Building facades facing a boundary of a zone primarily intended to accommodate sensitive receivers, a public road, or public open space incorporate design elements to add visual interest by considering the following:*
- (a) *using a variety of building finishes*
 - (b) *avoiding elevations that consist solely of metal cladding*
 - (c) *using materials with a low reflectivity*
 - (d) *using techniques to add visual interest and reduce large expanses of blank walls including modulation and incorporation of offices and showrooms along elevations visible to a public road.*

The development provides a generous setback to Womma Road, achieved through a 7.5m road widening buffer area and siting the car park to the front of the building. This provides high visual and environmental amenity to satisfy PO 3.1.

The building design and detailing is contextually appropriate and satisfies PO 3.2 because:

- The building facades feature varied materials and forms to create visual interest when viewed from Womma Road.

- The building height and low-pitched roof form reference the residential character to the north of the site.
- External materials also reference the residential interface, introducing texture through the use of brick and narrow profile cladding.

5.3.2 Building Setbacks

The Strategic Employment Zone seeks:

PO 3.3 *Buildings are set back from the primary street boundary to contribute to a consistent streetscape.*

PO 3.5 *Buildings are sited to accommodate vehicle access to the rear of a site for deliveries, maintenance and emergency purposes.*

In addition, the Future Road Widening Overlay seeks:

PO 1.1 *Development does not compromise or is located and designed to minimise its impact on future road widening requirements.*

DPF 1.1 *Development does not involve building work, or building work is located wholly outside the land subject to the 6m Consent Area, the C Type Requirement or the Strip Requirement of the Metropolitan Adelaide Road Widening Plan.*

No consistent street setback pattern is observed along the southern side of Womma Road due to the limited extent of buildings.

Land to the east is subject to a current planning application (by the same proponent) which seeks development setbacks of between 15.6m to 39.6m from Womma Road. This application has taken reference from the McDonalds, further east of the site, which is setback a minimum of 17.9m from Womma Road.

Dwellings on the northern side of Womma Road are setback between 13 and 21 metres and are separated from Womma Road by local roads.

The child care facility is proposed to be setback 26.4m from the Womma Road boundary. Separation is also provided by the car parking area to the front of the building. This contributes positively to the nature of the Womma Road streetscape (to satisfy PO 3.3).

The proposal does not include development within the 6m consent area to satisfy the provisions of the Future Road Widening Overlay.

5.4 Advertising Signage

The Zone provides the following provisions relevant to advertisements:

PO 7.1 *Freestanding advertisements do not create a visually dominant element within the locality.*

DPF 7.1 *Freestanding advertisements:*

- do not exceed 6m in height*
- do not have a sign face exceeding 8m² per side.*

The Advertisements General Development Policy also provides provisions relevant to this application. Due to the large number of provisions in this section, they have not been reproduced here. They are considered in the below assessment nevertheless.

The development includes the following non-illuminated signage:

- A 4.6m high pylon sign setback 7.5m from the Womma Road boundary.
- A 3.37m x 1.15m wall sign on the front façade.

The proposed advertising signage satisfies the relevant provisions of the Code because:

- Signage has been limited to two signs and the varied style and siting means signage is not visually dominant.
- The pylon sign is setback 7.5m from the Womma Road boundary and is less than 6m in height to satisfy DPF 7.1.
- The primary wall sign has been integrated with the design of the building and is positioned above the entrance.

5.5 Proximity to Defence Aviation

5.5.1 Building Height

The Defence Aviation Area Overlay seeks:

PO 1.1 *Building height does not pose a hazard to the operations of Defence Aviation Areas.*

DPF 1.1 *Building height does not exceed the relevant height specified by the Defence Aviation Area Overlay.*

The subject site is specified as within the 'All Structures over 15 metres' layer of the overlay.

The Building Near Airfields Overlay also includes the following provisions:

PO 1.3 *Buildings are adequately separated from runways and other take-off and landing facilities within certified or registered aerodromes to minimise the potential for building-generated turbulence and windshear that may pose a safety hazard to aircraft flight movement.*

DPF 1.3 *The distance from any part of a runway centreline to the closest point of the building is not less than 35 times the building height.*

The development has a maximum building height of 4.65m. This satisfies PO and DPF 1.1 listed above.

The proposed development is sited a minimum of 3.24km from the runway centreline. This is almost 700 times the maximum height of the proposed buildings. As such, the development satisfies PO 1.3 and DPF 1.3 and is adequately separated from the Edinburgh RAAF Air Base runway.

5.5.2 Lighting

The Building Near Airfields Overlay provides the following policy provision:

PO 1.1 Outdoor lighting associated with a non-residential use does not pose a hazard to commercial or military aircraft operations.

DPF 1.1 Development:

(a) primarily or wholly for residential purposes

(b) for non-residential purposes that does not incorporate outdoor floodlighting.

(Underlining added)

The site is subject to Concept Plan 81 – Edinburgh Defence Airfield Lighting Constraints. This concept plan establishes constraints for the amount of upward light emitted from sites within proximity to the Edinburgh RAAF Air Base runways.

The subject site is not identified within Zone A-D on the Concept Plan. Instead it falls within the Controlled Light Installation Area (6km buffer from runways). This establishes a maximum intensity of light source measured at 3 degrees above the horizontal.

The development will not include outdoor floodlighting to satisfy DPF 1.1 above.

Consent conditions could be included to confirm lighting requirements for the site should Council require.

5.6 Landscaping

The Strategic Employment Zone seeks:

PO 5.1 Landscaping is provided along public roads and thoroughfares and zone boundaries to enhance the visual appearance of development and soften the impact of large buildings when viewed from public spaces and adjacent land outside the zone.

Notably, DPF 5.1 excludes any land required for road widening purposes.

PO 5.2 Development incorporates areas for landscaping to enhance the overall amenity of the site and locality.

DPF 5.2 Landscape areas comprise:

(a) not less than 10 percent of the site

(b) a dimension of at least 1.5m.

PO 5.3 Landscape areas incorporate a range of plant species of varying heights at maturity, including tree species with a canopy above clear stems, to complement the scale of relevant buildings.

The 7.5 metre-wide road widening area along Womma Road is free from development. This area will instead feature a mix of shrubs and ground covers to improve the visual appearance along Womma Road to satisfy Zone PO 5.1.

In addition to the 312m² area along the road frontage, landscaped areas are provided around the perimeter of the car parking. With This provides that landscaped areas comprise over 10% of the site area to satisfy PO and DPF 5.2.

5.7 Site Contamination

The development will introduce a more sensitive land use (Educational premises class 1).

A preliminary site investigation (PSI) has been prepared by Land & Water Consulting (LWC). The PSI concluded that site contamination may exist within proximity of the site. A Construction Environment Management Plan (CEMP) has also been prepared by LWC.

LWC consider the site suitable for the proposed land use subject to compliance with the CEMP.

5.8 Stormwater Management and Flooding

5.8.1 Stormwater Management

PT Design has prepared a Site Levels and Drainage Plan for the site. This details the proposed on-site stormwater management for the development.

The site will drain to a detention tank and discharge beyond the site into the existing swale to the west of the development site.

PT Design have included detention calculations and have provided stormwater detention systems to Council's recommendations.

5.8.2 Flooding

While there are portions of the broader subject land (Lot 204) that are in the Hazards (Flooding) and Hazards (Flooding – General) Overlays, each of these Overlays do not apply to the subject site under consideration for this application. As such, there is no requirement to consider the provisions of either Overlay for this application.

5.9 Traffic, Access and Parking

A Traffic and Parking Report dated 3 April 2025 has been prepared by MFY Pty Ltd. The report confirms the development satisfies the relevant provisions of the Code because:

- Vehicle access to the site is provided via an approved access point to Womma Road.
- Access points, car parking spaces, drive-through facilities and loading areas have been designed to allow adequate movement and manoeuvrability within the site.
- The site has been designed such that all vehicles can enter and exit in a forward direction.
- The development application includes the construction of an internal driveway, as shown on the site plan prepared by Bell Architecture. This ensures the development can be constructed and suitability accessed independently and does not rely on the completion of development of adjacent land. Council may also seek to include conditions of consent requiring that the Womma Road access be constructed prior to occupation.

- Refuse collection vehicles can enter and exit the site in a forward direction and do not interfere with internal road movements or car parking spaces.
- The child care facility is serviced by 28 on-site car parking spaces. Parking surveys undertaken for the Australian Childcare Alliance South Australia identified a maximum peak parking demand rate of one space per 4.2 children. This equates to a maximum demand of 28 parking spaces for the development.

In contrast, the Code seeks one space per 4 children or 29.75 spaces for the subject development. MFY have provided survey data that supports the proposed on-site parking provision of 28 spaces. In any case, there is sufficient space for at least two kerbside parking spaces along the 8.1m internal access road adjacent to the child care facility to satisfy the Code parking space requirement.

5.10 Waste Management

The Building Near Airfields Overlay includes the following provision:

PO 1.2 *Development likely to attract or result in the congregation of wildlife is adequately separated from airfields to minimise the potential for aircraft wildlife strike.*

In addition, the following provision in the Design General Development Policies guides the management of waste on site:

PO 1.5 *The negative visual impact of outdoor storage, waste management, loading and service areas is minimised by integrating them into the building design and screening them from public view (such as fencing, landscaping and built form) taking into account the form of development contemplated in the relevant zone.*

The development is supported by a bin storage area directly adjacent to the building. This bin storage area has been screened from public view with 1.8m screening integrated with the facilities boundary fencing.

Private waste collection is proposed and will occur within the hours set by the *Local Nuisance and Litter Control Act 2016* (between 7am and 7pm, or 9am and 7pm on Sundays and public holidays).

Waste collection will safely occur from the internal driveway car park as detailed in MFY's Traffic and Parking Report.

6. Conclusion

The proposed development satisfies the relevant Planning and Design Code policies because:

- The proposed development of a child care facility is an acceptable land use in this port of the Zone because:
 - It occurs in a part of the Zone where low impact uses are envisaged.
 - It will have no adverse impact on the amenity and safety of any residential land in the locality.
 - It will not limit the existing or future development on adjacent land given the nature of those uses and provision of a 25 metre buffer to the north-west.
 - It will occupy 0.058% of land within the Strategic Employment Zone, meaning it will not preclude development of “higher-impacting land uses” sought for the remaining portions of the Strategic Employment Zone outside of the Zone interface.
- The single-storey building and landscaped frontage to Womma Road provides high visual and environmental amenity along the state maintained road and residential interface.
- The building design references the adjacent residential dwellings through its building height, roof form and external materials.
- Advertising signage has been limited in size, type and number across the site.
- While the site is in proximity to the Edinburgh RAAF Air Base, building heights and outdoor lighting do not pose hazards to aviation operations.
- The development provides sufficient landscape areas within the site, including landscaping along the Womma Road frontage to improve the streetscape.
- The development provides sufficient off-street parking, vehicular access and waste management strategies.

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Drakes.

22 July 2025

Ms Matilda Asser
Consultant
URPS
27 Halifax Street
ADELAIDE SA 5000

**DEVELOPMENT APPLICATION FOR CHILD CARE FACILITY
PART OF ALLOTMENT 204 D 124140**

Dear Matilda,

I write on behalf of Brave Wholesalers Pty Ltd, which is part of the Drakes Supermarkets Group (collectively 'Drakes'). Drakes is the owner of Lot 204 D124140 (CT6246/490) and Lot 314 F162663 (CT6246/941). These allotments are identified as 17 Stebonheath Road, Edinburgh North.

A portion of Lot 204 is the subject of a development application for the proposed Child Care Facility (DA 25005488). Drakes is also a joint venture partner with Leyton Property in the development of this Child Care Facility and the associated retail development under DA 24042350.

You advised that the Council has expressed concern regarding the potential impact of future development on the subject portion of Allotment 204, due to the Child Care Facility's classification as a sensitive land use by the EPA. I understand that you are obtaining advice from an experienced acoustic engineer, who is assessing how the child care facility can be protected from existing and future industrial uses within the Strategic Employment Zone.

As part of that assessment, your acoustic engineer has enquired about the likely future use of the undeveloped portion of Allotment 204 (between Drakes existing distribution facility and land subject of DA 24042350 and DA 25005488. This was also a question raised by the Council Assessment Panel.

I can confirm the following:

- Drakes currently operates a warehouse/distribution facility at 17 Stebonheath Road, which was completed in or about 2019. The facility extends across both Allotments 204 and 314.
- The land within Lot 204, subject to DA 24042350 and DA 25005488, is separated from the distribution facility by an approximately 105 metre-wide portion of undeveloped land. As such, this undeveloped land also forms part of Lot 204.

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Drakes.

- This undeveloped land is a strategic, long-term asset for Drakes. We do not intend to divest it.
- It is Drakes' intention to use this undeveloped land for similar warehouse/distribution activities in the future, supporting or extending the existing distribution facility (subject to relevant approvals).
- Any future operations on this undeveloped portion of land are therefore expected to generate noise primarily from forklifts and vehicular movements. It is likely to comprise hardstand areas, adjacent to the existing enclosed distribution building. Accordingly, active vehicle and forklift movements will be well separated from the Child Care Facility site.

I trust this information assists with your discussions with Council. Please do not hesitate to contact me should you have any further queries.

Yours faithfully,

Bob Soang
General Manager
Drakes Supermarkets

PHONE: 0418 821 565
EMAIL: bob.soang@drakes.com.au



27 August 2025
Reference ID: 749-4

URPS
Matilda Asser
masser@urps.com.au
0421 231 499

Echo Acoustics Pty Ltd
72-76 Edmund Avenue
Unley SA 5061
ABN 88 656 927 641

**Child Care Facility at 17 Stebonheath Road, Edinburgh North
Environmental Noise Assessment**

Dear Matilda,

The proposed Child Care Facility at 17 Stebonheath Road, Edinburgh North, as detailed in Development Application ID 25005488 (the **development**) is in a Strategic Employment Zone of the *Planning and Design Code* (the **Code**).

Such a development is defined as a sensitive receiver in the Code. Echo has been asked to consider whether the development would:

1. be adversely affected by envisaged land uses in the Strategic Employment Zone
2. (unreasonably) constrain envisaged land uses in the Strategic Employment Zone.

The existing and anticipated land uses are as generally depicted in Figure 1 and include the Drakes distribution centre to the south, proposed warehouses to the west (subject to future development application) and retail to the east (approved). Figure 1 also depicts the development (labelled as child care facility) and other zones including the Master Planned Neighbourhood Zone to the north and Residential Park Zone to the southwest.

Figure 1 Envisaged Land Uses and Zones



Source URPS 17 Stebonheath Road, Edinburgh North Report reference 24ADL-1040 V3

Assessment Background

In a general sense, the Code seeks that sensitive receivers are protected from adverse impacts generated by existing and envisaged land uses.

The *Environment Protection (Commercial and Industrial Noise) Policy 2023* (the **Policy**) provides "legislative noise levels" which seek to protect against unreasonable impacts at sensitive receivers.

The Policy's noise levels are adjusted according to the land use promoted in the zone. Importantly, the noise levels are significantly higher for a sensitive receiver in a Strategic Employment Zone than a sensitive receiver in a Master Planned Neighbourhood Zone.

In the circumstances of the land in this locality near a residential area, the Policy approach is such that a land use in the Strategic Employment Zone is likely to be more constrained by dwellings in the Master Planned Neighbourhood Zone.

Notwithstanding the above, this environmental noise assessment (the **assessment**) determines the likely noise levels at the development from envisaged land uses in the Strategic Employment Zone and provides recommendations to ensure compliance with the Policy.

The following Code and Policy framework is relevant to the assessment.

The Planning and Design Code

The development and surrounding land to the south of Womma Road is located within a Strategic Employment Zone of the *Planning and Design Code Version 2025.10 dated 29 May 2025* (the **Code**). The land to the north of the development is located within a Master Planned Neighbourhood Zone of the Code. The provisions that are considered most relevant to the assessment are provided below (*emphasis added*):

Strategic Employment Zone (Part 2 – Zones and Sub Zones)

Performance Outcome PO 1.1

Development primarily for a range of higher-impacting land uses including general industry, warehouse, transport distribution and the like is supplemented by other compatible development so *as not to unduly impede the use of land in other ownership in the zone* for employment-generating land uses, particularly those parts of the zone unaffected by an interface with another zone that would be sensitive to impact-generating uses.

Performance Outcome PO 1.2

Development on land adjacent to another zone which is used for residential purposes incorporates a range of low-impact, non-residential uses to *mitigate adverse amenity* and safety impacts on the adjoining zone.

Interface between Land Uses (Part 4 – General Development Policies)

Desired Outcome DO 1

Development is located and designed to *mitigate adverse effects* on or from neighbouring and proximate land uses.

Performance Outcome PO 1.1

Sensitive receivers are designed and sited to protect residents and occupants from *adverse impacts generated by lawfully existing land uses* (or lawfully approved land uses) *and land uses desired in the zone*.

The Policy

Strategic Employment Zone PO 1.1 and interface between land uses DO 1 and PO 1.1 seeks that the development does not (unreasonably) impede the land uses in the Strategic Employment Zone, and to be designed and sited to protect against adverse impacts.

The Policy is an objective instrument under the *Environment Protection Act 1993* (the **EP Act**). The EP Act seeks that noise does not unreasonably interfere with the enjoyment of an area.

The Policy provides an objective approach to satisfy the EP Act. The EP Act aligns with the intent of the relevant desired outcomes and performance outcomes of the Code (and is referenced as a Deemed-To-Satisfy provision in the interface section of the Code) such that the Code is also considered to be satisfied through compliance with the Policy.

In addition to satisfying the Code, no enforcement action against the noise generating activity can be taken under the EP Act where the Policy is achieved. That is, if the Policy is achieved at a sensitive receiver located adjacent a noise generating land use, then the Policy 'protects' that adjacent land use against an unreasonable constraint of its operations.

The Policy establishes indicative noise levels that apply at a sensitive receiver for both the day (7.00am to 10.00pm) and night (10.00pm to 7.00am the following day).

The indicative noise levels vary according to the principal land uses promoted in the zones where the future land use and sensitive receiver are located. Where new land uses are introduced, the Policy criteria at a sensitive receiver are the indicative noise levels (as determined by the Policy) minus 5 dB(A).

In this circumstance, the Policy nominates an equivalent¹ noise level (**L_{Aeq}**) of 60 dB(A) during both the day and night for new land uses in the Strategic Employment Zone when assessed at the development (the **noise criterion**).

¹ An equivalent noise level is the energy averaged noise level over a period.



It is noted in a Strategic Employment Zone near a Master Planned Neighbourhood Zone land uses including but not limited to the following are identified:

- Bulky goods outlet
- Consulting room
- Indoor recreation facility
- Light industry
- Motor repair station
- Office
- Place of worship
- Research facility
- Service trade premises
- Store
- Training facility
- Warehouse.

For comparison, the noise criteria at sensitive receivers in the Master Planned Neighbourhood Zone and Residential Park Zone from envisaged land uses in the Strategic Employment Zone are as follows:

- An L_{Aeq} of 52 dB(A) during the day
- An L_{Aeq} of 45 dB(A) during the night
- A maximum noise level (L_{Amax}) of 60 dB(A) during the night

The above noise levels are more restrictive than the noise criterion applicable to sensitive receivers in the Strategic Employment Zone, and any new land uses in the Strategic Employment Zone will need to be designed to satisfy the Policy at the dwellings in the Master Planned Neighbourhood Zone and other surrounding zones (such as the Residential Park Zone to the southwest).

Put another way, the Code and the Policy require that envisaged land uses in the Strategic Employment Zone account for the lower noise levels in the adjacent residential zones. Given that the development is located on the boundary of the Master Planned Neighbourhood Zone, land uses within or adjacent to the interface will be heavily restricted by the residential area. This is guided by the Code in PO 1.2 and list of anticipated land uses in the corresponding DPF 1.2 as summarised above.



Noise Predictions

Noise predictions have been made to determine the likely noise levels at the development from the envisaged land uses in the Strategic Employment Zone.

Noise Assessment Inputs

The noise predictions have been based on the following envisaged land uses:

1. Service trade premises immediately to the east of the development (understood to be the most intensive use of the land that could potentially occur)
2. Extension of the existing Drakes warehouse/distribution facility to the immediate south of the development (understood to be the most likely use of the land based on advice from Drakes, letter dated 22 July 2025)
3. A warehouse facility to the west of the development on the opposite side of the drainage swale (understood to be the most likely use of the land).

Operational Assumptions

The predicted noise levels at the development have been based on the following concurrent activity at each of the above envisaged land uses:

1. Service trade premises (to the east) with:
 - continuous tyre changing and automotive maintenance activities within the building at a sound pressure level of 76 dB(A) with doors open
 - one heavy rigid vehicle truck movement in and out of the premises with a sound power level of 96 dB(A)
 - five passenger vehicle movements in and out of the premises with a sound power level of 81 dB(A) per arrival or departure
 - Continuous operation of mechanical plant with a combined sound power level of 88 dB(A).
2. Extension of the existing Drakes warehouse/distribution facility (to the south) with:
 - two refrigerated truck movements in and out of the facility, each with a sound power level of 100 dB(A) per arrival or departure
 - continuous operation of a refrigerated truck with a sound power level of 92 dB(A)
 - one forklift continuously loading and unloading trucks, each with a sound power level of 96 dB(A)
3. A warehouse facility (to the west) with
 - two truck movements in and out of the facility, each with a sound power level of 100 dB(A) per arrival or departure
 - one forklift continuously loading and unloading trucks, each with a sound power level of 96 dB(A)



27 August 2025
Reference ID: 749-4

By achieving the noise criterion, the development will be provided with reasonable acoustic amenity for its occupants and the envisaged land uses will not be unreasonably constrained.

Further Noise Reduction Measures

Whilst not required to satisfy the noise criterion, the following measures could also be considered to minimise noise at, and within, the development:

- a 1.8m high fence along the western side of the development to mirror that on the eastern side
- 6.38mm laminated glazing to all external windows and glass doors
- airtight seals to all external windows and glass doors.

These further noise reduction measures provide a level of (acoustic amenity) protection which is above and beyond that required under the Policy.

It is important to note that the above assessment does not account for any noise reduction measures that would typically be incorporated at the envisaged land uses when considered against the broader Code requirements (such as fencing on that land). That is, in the process of designing an envisaged land use to achieve the Code, particularly at dwellings in the Master Planned Neighbourhood Zone, that land use will incorporate its own noise reduction measures, the (positive) effect of which have not been accounted for in the above assessment.

More Intensive Land Uses

Echo has been asked to consider the implications of a scrap metal yard with external processing in the closest allotment to the southwest of the development on the opposite side of the drainage swale.

The predicted noise levels at the development have been based on the following concurrent activity:

- use of an excavator to compress scrap metal in a hook-lift bin, with a sound power level of 107 dB(A)
- bins being manoeuvred and transferred by a forklift and tipped into a larger metal hook-lift bin, with a sound power level of 102 dB(A)
- a 12.5m long heavy rigid vehicle (truck) movement in and out of the facility for the collection of a hook-lift bin with a sound power level of 97 dB(A) per arrival/departure (vehicle manoeuvring, opening, and closing doors and loading)
- a forklift unloading/loading a truck or manoeuvring, with a sound power level of 97 dB(A)
- manual unloading of scrap metal into storage bins for 5 minutes, with a sound power level of 96 dB(A).

The noise to the development has been predicted using the noise calculation method provided by the Standard in combination with the above operational assumptions. The predicted noise levels include an 8 dB(A) adjustment (penalty) due to the "annoying" characteristics associated with scrap metal handling.

The noise predictions indicate that the external Policy noise level of 60 dB(A) can be easily achieved in the Outdoor Play 01 of the development (which is the closest outdoor play area to an activity to the south west) subject to the full extent of the noise reduction measures in Figure 2 and the further noise reduction measures being implemented.



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Reference ID: 749-4

The noise predictions are based on the scrap metal yard incorporating boundary fencing to ensure compliance with the Policy at dwellings in the Master Planned Neighbourhood Zone; noting that the noise predictions confirmed that the dwellings in the Master Planned Neighbourhood Zone would constrain the scrap metal yard significantly more than the development.

Conclusion

The noise levels at the development from envisaged land uses in the Strategic Employment Zone have been assessed against the Policy.

Where the Policy is achieved, the development will be provided with reasonable acoustic amenity for its occupants and the envisaged land uses will not be unreasonably constrained.

The implementation of the recommended noise reduction measures identified in this assessment will ensure the Policy is achieved for the development from envisaged land uses in the Strategic Employment Zone. While not required to satisfy the Policy, it is understood that the "further noise reduction measures" as identified above will also be implemented to provide additional noise reduction at the development.

Consideration of a scrap metal yard in the closest allotment to the southwest of the development in the Strategic Employment Zone has also been made. The noise predictions indicate that the Policy can be achieved in the closest outdoor play area with the full extent of the noise reduction measures and the further noise reduction measures being implemented, and with the scrap metal yard incorporating boundary fencing to ensure compliance with the Policy at dwellings in the Master Planned Neighbourhood Zone.

Based on the above, it is considered that the development satisfies all the relevant *Planning and Design Code* provisions.

Please do not hesitate to call me if you have any questions.

Sincerely

A handwritten signature in blue ink, appearing to read 'Jason Turner', is written over a light blue rectangular background.

Jason Turner

Director

Email JasonTurner@echoacoustics.com.au

Mobile 0410 920 122

Frequently Asked Questions

Could a more intensive use than warehousing be accommodated to the immediate southwest of the development?

A more intensive land use than warehousing, such as a scrap metal yard, could be accommodated to the southwest of the development as detailed in the assessment above.

Is vibration an issue?

Vibration generated by an activity such as the crushing of vehicles will generally only be felt within close proximity and therefore it is the noise levels generated by the activity which typically need to be addressed at an interface. In this circumstance, with a buffer distance of 25m to the west of the development from the drainage swale and with the location of the Master Planned Neighbourhood Zone, if the noise impacts are adequately addressed then any vibration impacts will be inherently addressed.

Will the occupants of the child care centre be protected from noise impacts?

Where the Policy is achieved, the development will be provided with reasonable acoustic amenity for its occupants. The noise criterion established by the Policy is similar to noise levels experienced in many other publicly accessible locations and child care centres on major roads.

Will the child care centre create future land use conflict?

With the implementation of the 'further noise reduction measures' in this report, the child care centre will be provided with reasonable acoustic amenity for its occupants and the envisaged land uses in the Strategic Employment Zone will not be unreasonably constrained. As such, the child care centre will not serve so as to inhibit future land uses and accordingly will not result in unreasonable future land use conflict.

Will the proposed measures ensure that the development of a future envisaged land use is not required to provide onerous acoustic treatment on their land?

With the implementation of the 'further noise reduction measures' in this report, the envisaged land uses in the Strategic Employment Zone will not need to incorporate onerous acoustic treatment on their land. Indeed, the assessment has been conducted without any acoustic treatments being included at the envisaged land uses. A more intensive land use such as a scrap metal yard to the immediate southwest of the development will need to incorporate boundary fencing to ensure compliance with the Policy at dwellings in the Master Planned Neighbourhood Zone. With this boundary fencing in place, the Policy will be easily achieved at the development.

Could a more intensive land use further into the Strategic Employment Zone create future land use conflict with the child care centre?

The noise levels generated by an intensive land use which is a large distance from both the child care centre and a dwelling in the Master Planned Neighbourhood Zone will be similar at both locations. The Policy establishes lower allowable noise levels in the Master Planned Neighbourhood Zone and so compliance will be harder to achieve in this zone than at the child care centre.

MLM/24-0263

3 April 2025

Ms Matilda Asser
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MFY Pty Ltd

ABN 79 102 630 759

Dear Matilda,

PROPOSED CHILD CARE CENTRE, WOMMA ROAD, EDINBURGH NORTH

We refer to the proposed development of a child care centre at the corner of Womma Road and Stebonheath Road in Edinburgh North. As requested we have reviewed the plan with respect to traffic and parking matters. The assessment has been based on BELL Architects' Site Plan A240125 DD0002 Revision D, dated 26 February 2025.

1 SUBJECT SITE

The subject site has frontage to Womma Road and is located at the western extent of a proposed integrated development site, the balance of which is a separate application which includes three quick service restaurants and a retail development. An additional quick service restaurant has been constructed at the eastern extent of the site (by others).

Access for the integrated development is to be provided as follows:

- a constructed access on Stebonheath Road;
- an approved left-in only access on Womma Road;
- a proposed access point on Womma Road central to the development site allowing all turning movements; and
- a proposed left-in/left-out access point in Womma Road adjacent the proposed child care site

Figure 1 identifies the broader development site.

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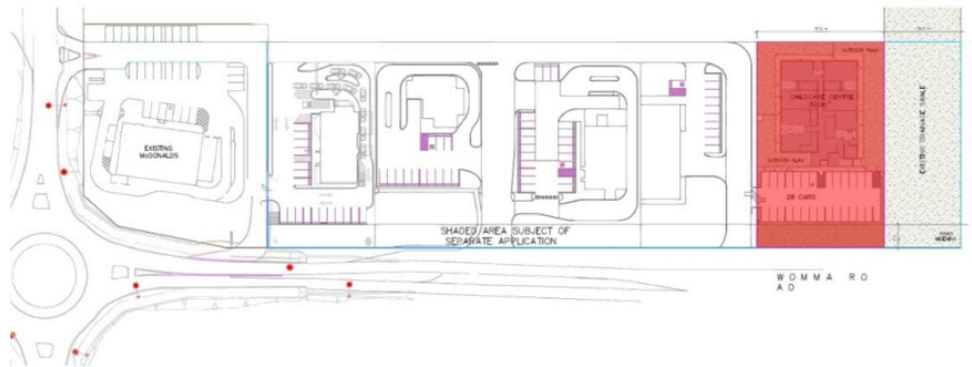


Figure 1: Development site

Womma Road is an arterial road within the care and control of the Commissioner of Highways which has an Annual Average Daily Traffic (AADT) volume in the order of 16,600 vehicles and a posted speed limit of 60 km/h. It has a two-lane carriageway with a painted median which opens to provide a channelised right turn lane at its intersection with Edward John Parade opposite the western extent of the subject site. The site is also subject to a 7.5 m future road widening requirement.

2 PROPOSAL

The proposal is for the development of a child care centre which will accommodate up to 119 children.

2.1 ACCESS

Access for the subject development will be provided via a connection to the access driveway located within the adjacent (mixed use) development site. The access has been located such as to ensure that egress movements will be functional following the widening of Womma Road, as illustrated in Figure 2.

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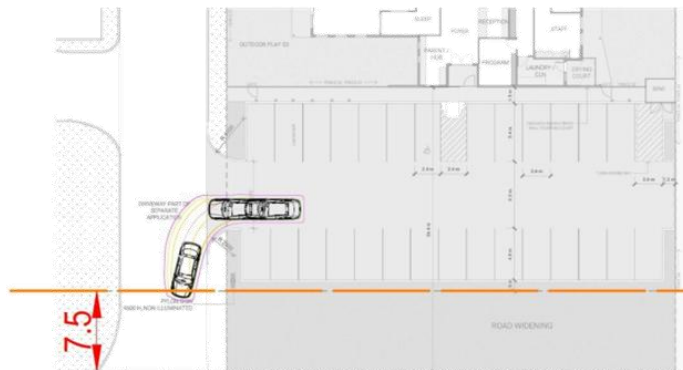


Figure 2: Egress movements following road widening

The connection will cater for simultaneous movements, as illustrated in Figure 3.

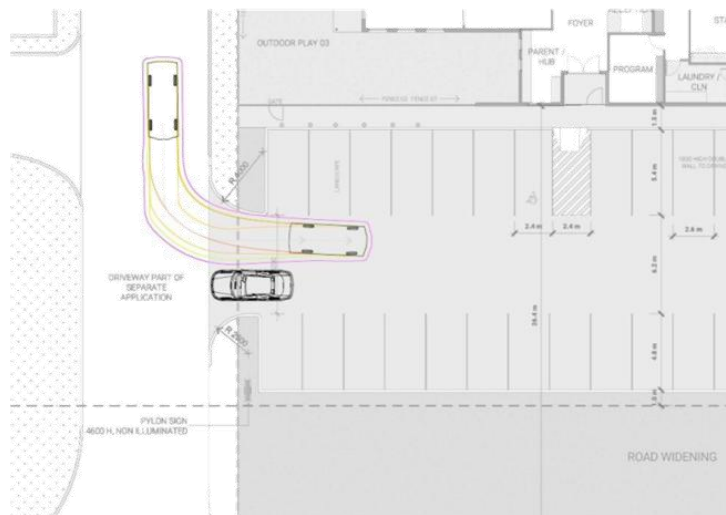


Figure 3: Simultaneous movements at internal access point

2.2 CAR PARK

The proposed car park will be designed in accordance with the Australian/New Zealand Standard *Parking facilities Part 1: Off-street car parking (AS/NZS 2890.1:2004)*, in that:

- parking spaces will be 2.6 m wide;
- parking spaces will be 5.4 m long or 4.8 m long with a 600 mmm overhang;
- the parking aisle will be 6.2 wide; and

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- the dead-end aisle will be extended by 1.0 m and will include a turnaround bay

One parking space will be designated for use by people with a disability and will be provided in accordance with the Australian Standard *Parking facilities Part 6: Off-street parking for people with disabilities (AS 2890.6:2022)* in that the space will be 2.4 m wide and 5.4 m long, with a similarly sized adjacent shared area.

2.3 REFUSE COLLECTION

Refuse collection for the development is proposed via the adjacent access driveway with bins being wheeled to the driveway via the proposed footpath along the frontage of the building. The collection would be infrequent and would not adversely impact traffic movements on the driveway. The largest waste collection vehicle which could be utilised to service the proposed child care centre would be approximately 10.4m in length. Given that the southern aisle of the adjacent development site has been designed to accommodate the turning movements of a Heavy Rigid Vehicle (HRV), the waste collection vehicle will be readily able to access the aisle. Figure 4 illustrates where a refuse collection vehicle would stop to collect waste.



Figure 4: Position of waste collection vehicle when collecting waste from child care centre

Use of the adjacent aisle is beneficial in that parking spaces would neither be obstructed or required to turn a vehicle and hence there can be flexibility with collection time. Collection would be limited to up two trucks on any day (but would typically be one movement approximately three times per week). Drivers in the aisle would be able to pass a parked truck for the short collection period as illustrated in Figure 5.

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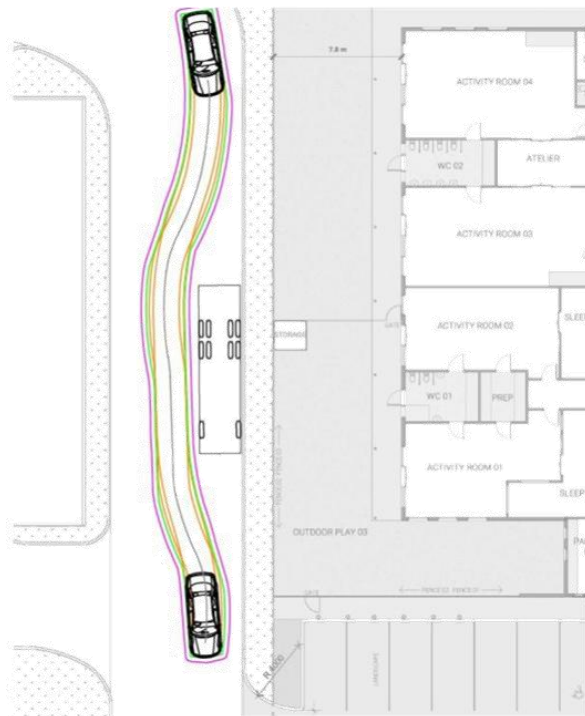


Figure 5: Vehicle passing parked refuse collection vehicle

3 PARKING ASSESSMENT

The Planning and Design Code (PDC) identifies a parking provision requirement of 0.25 parking spaces per child for a child care centre which equates to requirement of 30 spaces for the subject development.

However, parking surveys undertaken at a number of childcare centres for the Australian Childcare Alliance South Australia identified a maximum peak parking demand rate of one space per 4.2 children. This equates to a demand for 28 parking spaces for the subject development. The proposed car park will provide 28 spaces and will therefore accommodate the anticipated peak parking demand.

In any event, should there be a short period when the additional two spaces would be required, the peak demand period for the child care centre will not coincide with the adjacent integrated development. Further, it is anticipated that there will be some shared use where patrons of the child care centre will visit the facilities within the mixed use site and hence could park in spaces within the adjacent tenancies.

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4 TRAFFIC ASSESSMENT

The NSW *Guide to Transport Impact Assessment* identifies the following peak hour traffic generation rates for long day child care centres:

- 0.69 trips per licenced place in the network AM peak hour; and
- 0.33 trips per licenced place in the network PM peak hour

Based on the above rates, the proposed child care centre is forecast to generate in the order of 80 trips in the am peak hour and 40 trips in the pm peak hour.

The forecast volume associated with the subject development equates to approximately 5% of the existing hourly volume on Womma Road, which is the typical daily fluctuation in traffic volume on arterial roads. Accordingly, the development traffic will not have an appreciable impact on the nature and function of Womma Road.

Notwithstanding this, detailed analysis of the capacity at the proposed Womma Road access points is being undertaken in conjunction with the adjacent development proposal and has considered the total forecast volume for the integrated development site. This assessment will inform the design and capacity requirements for the access points.

5 SUMMARY

The proposed child care centre will be integrated with the adjacent development site, with shared access via Womma Road. Access for the development will be via the access driveways developed within the adjacent development and will cater for all vehicles to enter and exit the site in a forward direction. The car park will be designed in accordance with the relevant Australian Standards and will cater for the forecast peak parking demand. Traffic generated by the development will distribute between the several access points provided in the broader development site and will be readily accommodated on Womma Road.

Yours sincerely,

MFY PTY LTD

A handwritten signature in black ink, appearing to read 'Melissa Mellen'.

MELISSA MELLEN

Director



2010 NATIONAL WINNER
2010 TELSTRA SOUTH AUSTRALIAN
BUSINESS WOMAN OF THE YEAR



Preliminary Site Investigation







317 Stebonheath Road, Edinburgh North,
South Australia

Leyton Property Pty. Ltd.

January 2025



Document Status

Version	Doc type	Reviewed by	Approved by	Date issued
DR001	Draft report	Dr James Fox 	Dr James Fox 	8 November 2024
FR001	Final report	Dr James Fox 	Dr James Fox 	11 December 2024
FR002	Final report	Dr James Fox 	Dr James Fox 	10 January 2025

Project Details

Project Name	317 Stebonheath Road, Edinburgh North, South Australia
Client	Leyton Property Pty. Ltd.
LWC Project Manager	Dr James Fox
LWC Project Director	Ms Emily Picken
Authors	Charlotte Way
File Reference	LWC GK-16 PSI_Stebonheath Road Edinburgh North_FR002

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EXECUTIVE SUMMARY

Background

Land and Water Consulting (LWC) was engaged by Leyton Property Pty Ltd to undertake a Preliminary Site Investigation (PSI) of the property located 317 (17) Stebonheath Road, Edinburgh North, South Australia (the Site). Site locality and boundary plans are attached as Figures 1 and 2, respectively.

The Site has historically been used for agricultural purposes including cattle grazing and cropping. The Site is largely vacant with groundcover consisting of low grasses and weeds. The Site is fenced with a gated gravel driveway for access, and primarily flat except for a drainage swale along the western boundary. Tree-lined sections on the eastern and northern boundaries feature Eucalyptus and She-oak trees. A *McDonald's* is situated at the north-eastern corner of the site, and a *Drakes Distribution Centre* on the southern portion.

It is understood that Leyton Property plan to develop the Site for mixed sensitive (childcare centre) and commercial (fast-food and retail) use. Preliminary development plans are included as Appendix A.

In accordance with Table 1 of *State Planning Commission Practice Direction 14 (Site Contamination Assessment 2021)* ("Practice Direction 14"), the most recent use of the Site aligns with Item 6: *Primary Production (agriculture, including horticulture and intensive animal keeping)*, and the most sensitive proposed use aligns with Item 1: *Educational premises class 1 (pre-school or primary school premises)* which constitutes both a more sensitive land use under Practice Direction 14 and a sensitive land use under the *Environment Protection Act 1993*.

Objective

The objective of the PSI was to identify potential sources of contamination and associated contaminants of potential concern arising from current and historical activities undertaken on the Site, and/or within its immediate vicinity, that may give rise to site contamination (as defined in Section 5B of the *Environment Protection 1993*), with respect to the proposed future use of the Site for mixed sensitive and commercial purposes. A PSI report was completed by LWC in 2017 for the Site however State Planning Commission Practice Direction 14 (Site Contamination Assessment) states that a PSI has a currency of five years. Therefore the PSI is particularly required to cover the period 2017 to date, as well as collate previous findings.

Site History

Originally owned by a farmer and his wife since at least 1903, the Site changed ownership among various private individuals and companies. It has been in the control of the Government of South Australia since 1970, (South Australian Housing Trust then to South Australian Urban Projects Authority in 1996 which became the Land Management Corporation in 1998, and which itself became the Urban Renewal Authority in 2000. In 2020, the property was acquired by its current owners, Brave Wholesalers Pty. Ltd.

A review of aerial imagery indicates that the Site remained largely undeveloped over time, and anecdotal information from Tierra Environmental (2008) states that the Site was used for agricultural activities such as cropping and cattle grazing. A drainage swale was excavated along the western site boundary between 2011 and 2013, and 2 large stockpiles of the excavated material was stored along the western portion of the Site.

A PSI report was completed by LWC in 2018, which noted the large soil stockpiles, patches of surface waste and fragments of potential asbestos containing material (PACM). Following the PSI, the PACM was manually removed from the Site and a subsequent site inspection found no remaining visible PACM.

During 2018, the property to the south and a portion of the Site underwent clearing, and the *Drakes Distribution Centre* was constructed. During this period four large soil stockpiles were transported to the Site. These stockpiles were observed during the 2024 Site inspection, along with several smaller stockpiles containing bitumen, crushed concrete, bricks, rubber, and piping, likely transported in late 2023. This may coincide with



the construction of the *McDonalds* on the Site's north-eastern corner but may also have come from another source. Illegal dumping and litter was prevalent across the site, including various household items as well as construction and demolition debris.

The land surrounding the Site has been developed for commercial, residential, recreational and agricultural land uses.

Potentially Contaminating Activities (PCAs)

On-site

With reference to Schedule 3 of the *Environment Protection Regulations 2023* and/or Schedule 1 of Practice Direction 14, the following PCAs have, or may have, historically occurred on the Site:

- Although the Site was used for historical agricultural activities (i.e. livestock grazing and horticulture), this is only classified as a Class 2 PCA under Practice Direction 14 if it involved certain (specific) activities (i.e. burial of animals or parts of animals, burial of waste or other matter, irrigation using wastewater and/or intensive application or administration of a listed substance to animals, plants, land or water), none of which have been identified as occurring on the Site.
- Whole or part/s of the Site: *Importation of soil or fill material* (not classed as a PCA under Practice Direction 14).

In addition to the above, the following activities of potential interest have, or may have, occurred on the Site:

- use of asbestos containing building materials; and/or
- possible use of weedicides in unpaved areas.

A Construction Environmental Management Plan has been prepared for the Site and this would be sufficient to manage any unexpected finds and to manage and potential environmental issues encountered during development to a mixed sensitive/commercial land use.

Off-site

For the purposes of Practice Direction 14, which specifies that only Class 1 activities undertaken within 60 m of the Site need to be considered, the following PCAs have been identified:

- *Liberty Oil Edinburgh*- current service station located at 107-109 Womma Road (22 m east of the Site) – however this is a relatively new service station that was commissioned in 2021 and therefore we consider that this Class 1 PCA is unlikely to represent a source of contamination affecting the Site.
- *Esso Elizabeth West/ Mobil* – a former service station located at Lot 321 Womma Road between 1962 and 1999 (21 m north-east of the Site). This land was audited and is now residential land known as 19 and 21 Encounter Avenue, thus extremely unlikely to be an off-site source of contamination.

Potential Risks to Human Health and the Environment

With respect to the proposed future development/use of the Site for mixed sensitive purposes, the preliminary Conceptual Site Model (CSM) identified potentially complete exposure pathways and linkages associated with the current service station at 107-109 Womma Road, as well as historical activities and contamination identified at Lot 321 Womma Road (now 19 and 21 Encounter Avenue), as follows:

- Future users of the Site (workers and visitors): inhalation of soil vapour (potentially generated from impacted soil and/or groundwater, if present).



- Future on-site construction/maintenance workers: Dermal contact with and/or incidental ingestion of groundwater and inhalation of soil vapour (generated from impacted soil and/or groundwater – if present).
- The uppermost groundwater aquifer beneath the Site: Possible lateral migration of contaminants from off-site source/s

Site Contamination for the Purposes of Practice Direction 14

For the purposes of Schedule 2 of Practice Direction 14, site contamination (as defined in Section 5B of the *Environment Protection Act 1993*) **may exist** with respect to the proposed mixed sensitive/commercial land use – i.e. with respect to the historical Class 1 PCA located 21 m north and current Class 1 PCA located 22 m east, though these are considered to be trivial and unlikely to represent a significant potential of significant harm to future use/users of the Site.

Additionally, it is noted that the proposed sensitive development (childcare centre) is to be located on the north-western corner of the Site, approximately 160 m from historical Class 1 PCA and 220 m from current Class 1 PCA (at its closest point).

A Construction Environmental Management Plan has been prepared for the Site and this would be sufficient to manage any unexpected finds and to manage and potential environmental issues encountered during development to a mixed sensitive/commercial land use.

A Summary of Practice Direction 14 outcomes is summarised in the table below

Practice Direction 14 Schedule 2 Summary to Assist with Referral Determination

Trigger for Referral to the Environment Protection Authority	Yes	No	Detail
Class 1 Potentially Contaminating Activity (PCA) on site		✓	
Class 1 PCA offsite but within 60 m of the site	✓		<p><i>Liberty Oil Edinburgh</i>- current service station located at 107-109 Womma Road (22 m east of the Site) – however this is a relatively new service station that was commissioned in 2021 and therefore we consider that this Class 1 PCA is unlikely to represent a source of contamination affecting the Site.</p> <p><i>Esso Elizabeth West/ Mobil</i> – a former service station located at Lot 321 Womma Road between 1962 and 1999 (21 m north-east of the Site). This land was audited and is now residential land known as 19 and 21 Encounter Avenue, thus extremely unlikely to be an offsite source of contamination.</p>
Class 2 PCA on site and proposed use is a sensitive use	✓		<p>Although the Site was used for historical agricultural activities (i.e. livestock grazing and horticulture), this is only classified as a Class 2 PCA if it involved certain (specific) activities (i.e. burial of animals or parts of animals, burial of waste or other matter, irrigation using wastewater and/or intensive application or administration of a listed substance to animals, plants, land or water), none of which have been identified as occurring on the Site.</p>



Section 83A on site		✓	
Section 83A within 60 m of the Site	✓		Trace concentrations of trichloroethene, tetrachloroethene, chloroform, bromodichloromethane, & 1,2-dichloropropane were recorded in three on-site groundwater wells at the site of a former service station (Lot 321 Womma Road). The Site was audited in 2018 and is now residential land, thus extremely unlikely to be an offsite source of contamination.
Site is within a Groundwater Prohibition Area		✓	
Site is included within a notated Site Contamination Audit Report		✓	
Based on the above responses, Site contamination is:			
Likely to exist at the Site		✓	
May exist at the Site	✓		With respect to the historical Class 1 PCA located 21 m north and current Class 1 PCA located 22 m east, though these are considered to be trivial and unlikely to represent a significant potential of significant harm to future use/users of the Site under a mixed sensitive/commercial land use.
Unlikely to exist at the Site		✓	



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1 INTRODUCTION

1.1 OVERVIEW

Land and Water Consulting (LWC) was engaged by Leyton Property Pty Ltd to undertake (update) a Preliminary Site Investigation (PSI) of the property located 317 (17) Stebonheath Road, Edinburgh North, South Australia (the Site). Site locality and boundary plans are attached as Figures 1 and 2, respectively.

A PSI report was completed by LWC in 2017 for the Site however State Planning Commission Practice Direction 14 (Site Contamination Assessment) states that a PSI has a currency of five years. Therefore, the PSI is particularly required to cover the period 2017 to date, as well as collate previous findings.

The Site has historically been used for agricultural purposes including cattle grazing and cropping. The Site is largely vacant with groundcover consisting of low grasses and weeds. The site is fenced with a gated gravel driveway for access, and primarily flat except for a drainage swale along the western boundary. Tree-lined sections on the eastern and northern boundaries feature Eucalyptus and She-oak trees. A *McDonald's* is situated at the north-eastern corner of the site, and a *Drakes Distribution Centre* on the southern portion.

It is understood that Leyton Property plan to develop the Site for mixed sensitive (childcare centre) and commercial (fast-food and retail) use. Preliminary development plans are included as Appendix A.

In accordance with Table 1 of *State Planning Commission Practice Direction 14 (Site Contamination Assessment 2021)* ("Practice Direction 14"), the most recent use of the Site aligns with Item 6: *Primary Production (agriculture, including horticulture and intensive animal keeping)*, and the most sensitive proposed use aligns with Item 1: *Educational premises class 1 (pre-school or primary school premises)* which constitutes both a more sensitive land use under Practice Direction 14 and a sensitive land use under the *Environment Protection Act 1993*.

1.2 OBJECTIVE

The objective of the PSI was to identify possible sources of contamination and associated contaminants of potential concern (COPC) arising from current and historical activities undertaken on the Site, and/or within its immediate vicinity, that may give rise to site contamination¹, with respect to its proposed mixed sensitive/commercial development/use.

A PSI report was completed by LWC in 2017 for the Site however State Planning Commission Practice Direction 14 (Site Contamination Assessment) states that a PSI has a currency of five years. Therefore the PSI is particularly required to cover the period 2017 to date, as well as collate previous findings.

The objectives of this assessment also accord with Practice Direction 14 which states that a PSI under the relevant regulations must be sufficient to:

- a) identify potential on-site and off-site sources of contamination (known as potentially contaminating activities – PCAs); and

¹ where site contamination is defined in Section 5B of the *Environment Protection 1993* – refer to Appendix B



- b) determine potential chemical substances of concern; and
- c) identify areas of potential contamination; and
- d) identify potentially affected media (being soil, water and/or vapour).

Practice Direction 14 also states that a PSI report must be sufficient to provide an assessment of whether site contamination *exists, may exist* or is *unlikely to exist*.

1.3 SCOPE OF WORKS

The PSI was prepared with reference to:

- Schedule B(2) 'Guidelines on Site Characterisation' outlined in the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (ASC NEPM, 1999) and
- SA EPA (2019) – *Guidelines for the Assessment and Remediation of Site Contamination*.

The scope of works was as follows:

- review of current and previous Certificates of Title (CT) to assess ownership and former use/s of the Site;
- review of information obtained under Section 7 of the *Land and Business (Sale and Conveyancing) Act 1994*, from the South Australian Environment Protection Authority (SA EPA) for the Site's CT;
- review of historical maps and surveys of the Site, historical business directories and other relevant records (where available);
- review of Department for Environment and Water (DEW) groundwater bore data within a 2 km radius of the Site;
- compilation of details of the topography, hydrology, geology and hydrogeology for the Site and surrounds;
- review of current and historical uses of the Site through inspection of aerial photographs (at a minimum of 10 year intervals);
- inspection of the Site by LWC personnel;
- identification of the class/es of activities that are confirmed, or suspected, to have occurred on the Site, with reference to Schedule 1 of Practice Direction 14;
- identification of the class/es of activities that are confirmed, or suspected, to have occurred within 60 m of the Site, with reference to Schedule 1 of Practice Direction 14; and
- preparation of a report that documents the following:
 - the outcomes of the PSI – including a statement of whether site contamination (subject to Section 5B of the *Environment Protection Act 1993*) is likely, may or is unlikely to exist – i.e. given the proposed land use and aligned with Practice Direction 14 requirements;
 - a completed Schedule 2 of Practice Direction 14; and
 - any additional recommendations (as considered necessary).



2 SITE DETAILS

2.1 SITE IDENTIFICATION

A summary of Site particulars is presented as Table 2-1.

Table 2-1 Summary of Site Particulars

Site Address	17 Stebonheath Road, Edinburgh North, South Australia 5113
Certificate of Title (CT)	Portion of Volume 6246 Folio 490 Copies of the current and former CT are provided in Appendix C.
Property Description	Allotment 204 Deposited Plan 124140 In the Area Named Edinburgh North Hundred of Munno Para
Area of Site	Approximately 7 hectares
Local Government Authority	City of Playford
Zoning	Strategic Employment (SE) (refer to Appendix D – including the South Australian Property and Planning Atlas (SAPPA) reports)
Current Site Use	Northern portion is vacant – southern portion comprises of part of <i>Drakes Distribution Centre</i> , and the north-eastern corner features <i>McDonald's Edinburgh North</i> .
Ownership	Brave Wholesalers Pty. Ltd.
Proposed Land Use	Mixed sensitive (childcare centre) and commercial (fast-food and retail)

2.2 SITE SETTING

The current surrounding land uses are detailed in Table 2-2.

Table 2-2 Surrounding Land Uses

Boundary	Description of Surrounding Land Use
North	Womma Road, beyond which is residential properties. <i>Eyre Sports Park</i> to the north-west. X-Convenience Service Station ~230 m north west
East	Stebonheath Road beyond which is a commercial/ industrial land use and/ or vacant land. Identified businesses located directly beyond Stebonheath Road include: <ul style="list-style-type: none"> <i>Liberty Oil Edinburgh</i> service station approximately 22 m east Warehouse- recently built and for lease <i>Allingtons Outpost Distribution Centre</i>- Country, western and workwear company
South	<i>Drakes Distribution Centre</i> , beyond which is vacant land (possibly agricultural)
West	Vacant land (possibly historically agricultural) – appears to be under development.



3 REGIONAL SETTING

3.1 TOPOGRAPHY & HYDROLOGY

As shown in Appendix E, the Site is relatively flat and located at an elevation of approximately 24 m Australian Height Datum (AHD). The land surrounding the Site is generally flat.

The closest freshwater bodies to the Site are as follows:

- a swale adjacent site that runs parallel to the western Site boundary;
- a drainage channel approximately 40 m east, which flows to a creek located approximately 900 m south;
- An unnamed tributary of Smith creek located approximately 700 m to north-west.

The closest marine water body (Gulf St Vincent) is located over 12 km to the west.

3.2 GEOLOGY

The Department of Environment, Water and Natural Resources (DEWNR) surface geological map (1:100,000), as included in Appendix F, indicates that the Site is underlain by undifferentiated quaternary sediments, whereas the Atlas of Australian Soils indicates that the soils are classified as calcarosols and chromosols (refer to Table 3-1).

As also included in Appendix F, the CSIRO Atlas of Australian Acid Sulfate Soils indicates that there is an extremely low probability of occurrence (1-5%) of acid sulfate soils at the Site, with the potential for occurrences in small, localised areas.

Table 3-1 Surface Geology & Soil Type

Map Unit Code	Name	Description	Province	Age
Geology:				
Qa	Quaternary alluvial/fluvial sediments	Undifferentiated Quaternary alluvial/fluvial sediments	Unknown	Pleistocene-Holocene
Soil:				
La1	Calcarosol	Plain with tracts of dunes: plains of dark highly calcareous loamy earths with shallow forms of hard alkaline red soils and small areas of cracking brown clays interspersed with dune tracts of brown calcareous earths and brown sands.		
O1	Chromosol	Outwash plains: hard alkaline red soils, small areas cracking clay soils, also hard alkaline yellow mottled soils, minor various alluvial soils (unclassified) in the stream valleys.		

3.3 HYDROGEOLOGY

A porous, extensive high productivity groundwater aquifer is expected to be present beneath the Site (refer to Appendix G).



With reference to Location SA MapViewer, the minimum depth to the uppermost aquifer within the vicinity of the Site is expected to be between 5 and 10 m below ground level (BGL), with a salinity of between about 3,000 and 14,000 mg/L total dissolved solids (TDS).

A search of the DEW (2024) *WaterConnect* database identified the following (refer to Appendix G):

- A total of 292 registered bores are located within a 2 km radius of the Site, the recorded depths of which range from approximately 3.66 to 180 m BGL.
- Five bores are listed as on-site, with 2 operational irrigation/ stock bores (6628-2692, 6628-2693), 2 investigation bores (6628-31520, 6628-31521) and one collapsed bore (6628-2695) with SWLs ranging from 5.49 to 8.37 m BGL, salinity values ranging from 4,182 to 6,430 mg/L.
- Listed uses for operational bores within the 2 km buffer zone include domestic, irrigation, stock, recreational, environmental, observation/ investigation/ monitoring, construction materials and seismic purposes. The recorded SWLs range from 1.6 to 42 m BGL and salinity values range from about 820 to 21,388 mg/L TDS.
- Of the registered bores, 116 are listed as abandoned, backfilled, capped, collapsed, dry, not located or not operational.

3.4 GROUNDWATER ENVIRONMENTAL VALUE ASSESSMENT

3.4.1 Overview

When determining whether there is actual or potential harm to water that is not trivial, environmental values of water need to be considered, as prescribed in *Environment Protection (Water Quality) Policy 2015* (WQEPP). SA EPA (2019) acknowledges the importance of being clear on the approach to make determinations of 'actual or potential harm to water that is not trivial' and has developed a process to simplify making determinations of environmental values of groundwater at a site (Figure 3-1). For conservatism, where multiple environmental values of groundwater are identified, the most sensitive environmental value is considered.



Figure 3-1 Process to Determine Environmental Values of Groundwater at a Site

3.4.2 Step 1: Determination of Protected Environmental Values using the WQEPP

As detailed in Figure 3-2, the first step in determining the environmental values of groundwater at a Site involves an initial assessment of salinity (measured as mg/L TDS in the analytical laboratory and/or calculated from field electrical conductivity (EC) readings), so as to apply Clause 3 of Schedule 1 of the WQEPP, as shown in Table 3-2.

Based on the available registered bore data (refer to Section 3.4), the salinity of groundwater in wells installed to a maximum depth of about 180 m BGL have been recorded as ranging from 820 to 21,388 mg/L TDS – the



following environmental values (for groundwater with salinity values of <1,200 mg/L TDS²) are therefore considered to be potentially relevant:

- drinking water for human consumption (potable);
- primary industry- irrigation and general use;
- primary industries – livestock drinking water; and
- primary industries – freshwater aquaculture and human consumption of aquatic foods.

Environmental value	Notes
Drinking water - human	Determination is based on TDS ranges shown in clause 3, Schedule 1 of the WQEPP: <ul style="list-style-type: none"> • selection of the most conservative salinity level • salinity measured by an accredited analytical laboratory and reported in TDS mg/L
Primary industry – irrigation and general use	
Primary industry – livestock drinking water	
Primary industry - aquaculture	

Figure 3-2 Table 1 of SA EPA (2019): Application of the WQEPP to Determine Protected Environmental Values of Groundwater

Table 3-2 Summary of Environmental Values of Underground Waters as per the WQEPP

Salinity levels of underground waters	Aquatic ecosystem	Recreation and aesthetics	Drinking water for human consumption	Primary industries—irrigation and general water uses	Primary industries—livestock drinking water	Primary industries—aquaculture and human consumption of aquatic foods
Background TDS <1,200 mg/L	N/A	N/A	Yes	Yes	Yes	Yes
Background TDS level ≥1,200 mg/L, but <3,000 mg/L	N/A	N/A	N/A	Yes	Yes	Yes
Background TDS level ≥3,000 mg/L, but <13,000 mg/L	N/A	N/A	N/A	N/A	Yes	Yes

3.4.3 Step 2: Application of a Buffer Distance for Protection of Surface Waters

Step 2 addresses the application of a buffer distance for the protection of surface waters. Table 2 of SA EPA (2019) has been devised to offer a practical approach for the consideration of surface water impacts when determining of the environmental values of groundwater.

² i.e. based on the most conservative values



Some chemical substances are highly mobile when present as a dissolved phase and can migrate in groundwater over large distances (aerially) and depths (vertically). As detailed in Figure 3-3, the SA EPA recommends that a 2 km radius be set to establish a 'buffer distance' around the Site in order to make adequate determinations of the environmental value of groundwater with respect to relevant surface water receptors.

Based on the closest surface water receptors (refer to Section 3.1), potentially relevant environmental values are as follows:

- protection of aquatic ecosystems (freshwater); and
- recreational (non-domestic).

Environmental value	Notes
Aquatic ecosystems (fresh)	The environmental value is determined based on proximity to the nearest surface water body as the receptor, where the 'buffer distance' is represented by a 2-km radius of the site.
Aquatic ecosystems (marine)	
Recreational (non-domestic)	

Figure 3-3 Table 2 of SA EPA (2019): Application of a Buffer Distance for Protection of Surface Waters

3.4.4 Step 3: Review of Available Groundwater Data Using WaterConnect

Using the 2 km buffer distance established in Step 2, registered bore users are identified via the *WaterConnect* database as detailed in Figure 3-4.

As discussed in Section 3.3, operational groundwater bores have been installed for domestic, irrigation, stock, recreational, environmental, observation/ investigation/ monitoring purposes within 2 km of the Site.



Registered use ⁴⁵	Notes
Domestic (DOM)	The environmental value of groundwater should be determined based on registered groundwater wells (bore) for extractive uses, where the status is either active or unknown. Information and data from abandoned or decommissioned bores is not recommended.
Town water supply (TWS)	DOM registered bores can be used as a potable water supply by residential properties. Drinking water would be the applicable environmental value for domestic registered bores.
Recreational/aesthetics (IRR)	TWS bores are likely to be used for potable water supply. Drinking water would be the applicable environmental value for town water supply registered bores.
Industrial (IND) (IRR)	Monitoring and investigation registered bores have no environmental value that requires protection; rather, the data associated with these registered bores may be useful in determining the environmental values of groundwater ie by using salinity information.

Figure 3-4 Table 3 of SA EPA (2019): Application of WaterConnect (Groundwater Data) to Determine Environmental Values of Groundwater

3.4.5 Step 4: Actual or Potential Harm to Water That is Not Trivial – Application of EPA Recognised Criteria

Step 4 involves the identification of relevant environmental values of groundwater (based on the preceding steps) and the application of SA EPA recognised criteria – an assessment of the potential environmental values is provided in Table 3-3.

Table 3-3 Summary of Groundwater Environmental Values and Likelihood of Such Use

Environmental Values	Likelihood of Realising Environmental Values (Current & Realistic Future Potential)	
	On-Site	Off-Site
Potable	UNLIKELY: There are no existing domestic bores on the Site and, given the presence of a reticulated water supply as well as the proposed development, groundwater would not be expected to be used for potable purposes.	LIKELY: The <i>WaterConnect</i> groundwater database indicates that the groundwater in the area is currently accessed for domestic use. Additionally, the observed range of groundwater TDS values within the 2 km buffer zone indicates its potential suitability for potable use (i.e. at the lower end of the identified salinity range).
Recreation and Aesthetics	UNLIKELY: There are no existing recreational bores on the Site and, given the presence of a reticulated water supply as well as the proposed development, groundwater would not be expected to be used for recreational purposes.	LIKELY: The <i>WaterConnect</i> groundwater database indicates that the groundwater in the area is currently accessed for domestic recreational use. Additionally, the observed range of groundwater TDS values within the 2 km buffer zone indicates its potential suitability for this purpose.
Aquatic Ecosystems (Freshwater)	NONE: No surface water bodies are located on the Site.	POTENTIAL: There are surface waterbodies within a 2 km radius of the site that may represent a groundwater receiving environment.



Environmental Values	Likelihood of Realising Environmental Values (Current & Realistic Future Potential)	
	On-Site	Off-Site
Aquatic Ecosystems (Marine water)		NONE: No marine ecosystems are located within a 2 km radius of the Site.
(Primary industries) — irrigation and general water uses	UNLIKELY: There are two existing irrigation/stock watering bores on the Site (on the north-eastern portion) that are listed as operational on Water Connect. Given the presence of a reticulated water supply as well as the proposed development, it is considered unlikely groundwater would be used for irrigation purposes.	LIKELY: The <i>WaterConnect</i> groundwater database indicates that the groundwater in the area is currently accessed for irrigation. Additionally, the observed range of groundwater TDS values within the 2 km buffer zone indicates its potential suitability for this purpose (i.e. at the lower end of the identified salinity range).
(Primary industries) — livestock drinking water	UNLIKELY: There are two existing irrigation/stock watering bores on the Site (on the north-eastern portion) that are listed as operational on Water Connect. Given the presence of a reticulated water supply as well as the proposed development, it is considered unlikely groundwater would be extracted for livestock watering purposes.	LIKELY: The <i>WaterConnect</i> groundwater database indicates that groundwater in the area is currently accessed for stock watering purposes. Additionally, the observed range of groundwater TDS values in the 2 km buffer zone indicates its potential suitability for this purpose (i.e. at the lower end of the identified salinity range).
(Primary industries) Aquaculture and Human Consumption of Aquatic Foods	NONE: There is no indication that groundwater-supported aquaculture activities have been, or will be, undertaken on the Site.	NONE: No known commercial aquaculture activities, involving either surface water or groundwater, have been identified within 2 km of the Site.
<u>Environmental Values not prescribed in WQEPP but included for completeness of assessment</u>		
Human Health in Non-Use Scenarios (i.e. vapour flux) if volatiles present	UNKNOWN As no site assessment has been undertaken, the presence of volatile contaminants in the subsurface is unknown	KNOWN Off-site sources of groundwater volatile contamination were identified 21 m north-east of the Site (Lot 321 Womma Road), located at a former service station. Trace concentrations of: trichloroethene, tetrachloroethene, chloroform, bromodichloromethane, & 1,2-dichloropropane were recorded in three on-site groundwater wells. Further discussion in Section 5.2 of this report. Additionally a current <i>Liberty Oil</i> service station is located 22 m east of the Site.

3.4.6 Summary of Environmental Values Assessment

According to the four-step process adopted to determine environmental values of groundwater, the following are considered to be potentially relevant with respect to area surrounding the Site:

- potable;
- recreation (non-domestic) and aesthetics;
- freshwater ecosystem protection;
- irrigation; and
- livestock drinking water.



4 SITE HISTORY ASSESSMENT

4.1 CERTIFICATES OF TITLE

A review of information obtained via the South Australian Integrated Land Information System (SAILIS) website regarding historical Site ownership indicates the following (refer also to Appendix C)

- The earliest CT records indicate that the Site was owned by a farmer and his wife from at least 1903.
- A portion of the Site was transferred to a private individual in 1965, with his occupation listed as Railway Driver.
- The Site then changed hands between multiple property developers, including the South Australian Housing trust in 1970, South Australian Urban Projects Authority in 1996 and then Land Management Corporation in 1998 (name change to Urban Renewal Authority in 2000).
- The Site was transferred to its current owners (Brave Wholesalers Pty. Ltd.) in 2020.

4.2 HISTORICAL BUSINESS DIRECTORIES

As presented in Appendix H, the following historical business directory reviews were undertaken for the Site and surrounding area:

- all businesses listed within selected Sands & McDougall and Universal Business Directories (UBD) directories for the period 1910 to 1991 within a 100 m radius around the Site – including both premise or road intersection matches and road or area matches³; and
- dry cleaners, motor garages & service stations within selected Sands & McDougall and UBD directories for the period 1930 to 1991 within a 500 m radius around the Site – including both premise or road intersection matches and road or area matches⁴.

Although the majority of the surrounding historical (and current) businesses are commercial/retail, those that may have hosted activities considered capable of causing site contamination are summarised in Tables 4-1 and 4-2, noting that the road/area match distances listed are not accurate (just estimations) as the actual location could be anywhere along the identified road.

Table 4-1 Historical Business Listings – Road or Area Matches

Business Activity	Business Name – Address	Year	Distance (m)
Motor Accessories &/Or Spare Parts - Manufacturers &/Or Whole Salers	Aunger Accessories Pty Ltd, Womma Rd, Elizabeth West, 5113	1984-1991	11*
Ceramics Manufacturers &/or Suppliers	ERA Ceramics & Moulds, Kingstag Crescent, Elizabeth West. 5113.	1991	11**

Notes:

*Aunger was an Australian automotive accessory manufacturer and distributor. The address of the manufacturing warehouses is not available online, however a review of aerial imagery during this period does not indicate the presence of a manufacturing warehouse along Womma Road and is therefore unlikely to have been located within close vicinity to the site.

³ Note that little reliance is attached to the road or area match distances provided by Lotsearch as these are often contradicted by the premise match database search results (where available).



** Although no information is publicly available about the nature of this business, a review of aerial imagery from this period does not indicate any the presence of any buildings along Kingstag Crescent (within >100 m from the Site).

Table 4-2 Historical Motor Garage & Service Station Listings – Road or Intersection Matches

Business Name Address	Year	Distance (m)
Eso Elizabeth West Service Centre, Womma Rd, Elizabeth West. 5113	1973-91	11*
Howard C E, Womma road, Elizabeth West	1973	11**

Notes:

*actual historical location was at Lot 321 on the corner of Womma Road and Stebonheath Road, approximately 21 north-east of the Site.

** Although no information is publicly available about the nature or specific location of this business, a review of historical aerial imagery does not indicate the presence of a petrol station along Womma Road (within close vicinity of the Site).

4.3 AERIAL IMAGERY

A review of historical aerial photographs for the period 1935 to 2024 was undertaken – observations are presented in Table 4-4 whereas the aerial images are provided in Appendix I.

Table 4-3 Interpretation of Aerial Imagery

Date	Quality / Format	Observations – On-site	Observations – Off-site
1935-36	Poor/ Black and white	Site is vacant and appears to be used for agricultural purposes. Scattered trees are present.	Surrounding land appears to be used for agricultural purposes with a number of assumed land boundaries nearby. A number of structures (assumed to be homesteads) appear to be present to the west of the Site Edinburgh RAAF base further to the south of the Site (blurred part of the image).
1949	Poor/ Black and white	Generally consistent with the previous image.	Generally consistent with the previous stage although it appears that there has been some vegetation clearance on the property to the immediate south of the Site.
1957	Fair/ Black and white	Generally consistent with the previous image.	Generally consistent with the previous image.
1968-69	Fair/ Black and white	Land use appears to be generally consistent with the previous aerial image, although it appears the majority of scattered trees in the northern portion of the Site and larger trees planted through the central and southern portion of the Site have been removed A light-coloured feature is present in the northeastern corner of the Site which may be a structure. Lighter patches across the site indicate potential variations in vegetation cover/ earthmoving.	Immediately surrounding land use appears to be generally consistent with the previous image. A road appears to be established to the east of the Site (currently known as Stebonheath road – unclear if bituminised). Lighter/ darker patches on the land to the north of the site may indicate earthmoving/ development. Some residential development appears to be present north-east of the Site. Several structures are present to the north and west of the site. These are assumed to be used for horticultural purposes (potential greenhouses given their size). The structure to the west of the site appears to have expanded.



Date	Quality / Format	Observations – On-site	Observations – Off-site
1979	Good/ Black and white	Land use appears to be generally consistent with the previous aerial image, although the light-coloured feature identified in the previous image is no longer visible.	Immediately surrounding land use appears to be generally consistent with the previous image. Development of the current day industrial area appears to have commenced to the east of the Site.
1986-89	Good/ Colour	Land use appears to be generally consistent with the previous aerial image. Trees appear to have been planted around the northern and eastern site boundaries. Additional smaller trees appear to have been planted through the central portion of the Site.	Surrounding land use appears to be generally consistent with the previous aerial image. Further development of the current day industrial area appears to have taken place since the previous aerial image.
1997-99	Good/ Colour	Generally consistent with the previous image.	Generally consistent with the previous image, although new commercial buildings and car parks have been established on the properties to the west, east and south-east of the Site. Stebonheath Road appears to be bituminised.
2003	Good/ Colour	Generally consistent with the previous image.	Generally consistent with the previous image, although the bike tracks to the south of the Site appear to have been removed.
2014	Good/ Colour	Land use appears to be generally consistent with the previous aerial image. The swale/ open drain appears to be under construction/ constructed along the western Site boundary. Two large stockpiles of the excavated material are present parallel to the swale. This is considered to align with the government application to alter the site boundary.	Surrounding land use appears to be generally consistent with the previous aerial image. Additional commercial/ industrial structures and buildings have been developed to the south-east of the Site. The areas north of Womma Road are undergoing residential development, including the construction of new streets.
January 2017	Nearmaps – Very Good/ Colour	Generally consistent with the previous image.	Generally consistent with the previous image, although there has been some further residential development to the north, and commercial development to the east of the Site,
August 2018	Nearmaps – Very Good/ Colour	The southern portion of the Site has undergone clearing and leveling for the construction of the <i>Drakes Distribution Centre</i> . The stockpiles previously present along the western site boundary have been moved. There are now four large stockpiles present on the centre of the Site. It appears that the driveway currently present along the eastern boundary has been constructed.	Generally consistent with the previous image, although the property to the south has also been cleared for the <i>Drakes Distribution Centre</i> .
April 2019	Nearmaps – Very Good/ Colour	The large stockpiles appear to have been moved around the Site, and several small stockpiles of various materials are present through the centre and along the western boundary of the Site. The <i>Drakes</i>	Generally consistent with the previous image.



Date	Quality / Format	Observations – On-site	Observations – Off-site
		<i>Distribution Centre</i> is under construction, and the southern portion of the Site is being used for parking.	
February 2020	Nearmaps – Very Good/ Colour	It appears that the Drakes Distribution Centre has finished construction, and the small stockpiles of various materials have been removed from the Site.	Generally consistent with the previous image, although the property to the immediate east of the Site has been demolished.
February 2021	Nearmaps – Very Good/ Colour	Generally consistent with the previous image.	Generally consistent with the previous image, although a <i>Liberty Oil</i> service station has been constructed 22 m east of the site.
December 2021	Nearmaps – Very Good/ Colour	Generally consistent with the previous image, although many of the trees present along the northern and eastern boundaries have been cleared. Additionally, the concrete foundations for the McDonalds have been laid on the north-eastern corner of the Site and the gravel driveway (from eastern site entrance) has been extended towards it. It appears that three stockpiles of woodchips have been transported to the south-eastern portion of the Site.	Generally consistent with the previous image, although several stockpiles of various materials are being stored on the vacant property to the east.
March 2022	Nearmaps – Very Good/ Colour	Generally consistent with the previous image, although it appears that trees have been re-planted along the eastern and northern site boundaries.	Generally consistent with the previous image.
February 2023	Nearmaps – Very Good/ Colour	Generally consistent with the previous image.	Generally consistent with the previous image, although a portion of the vacant land to the east of the site is undergoing clearing/leveling.
August 2023	Nearmaps – Very Good/ Colour	Generally consistent with the previous image, although the McDonalds has finished construction. Some land to the west of the McDonalds has been cleared. A few smaller stockpiles are now present along the southern edge of the large stockpiles.	Generally consistent with the previous image, although there are several more stockpiles of black and grey material present on the vacant property to the east of the Site.
March 2024	Nearmaps – Very Good/ Colour	Generally consistent with the previous image, although several more stockpiles have been transported to the Site.	Generally consistent with the previous image, although a warehouse is being constructed on the property to the east of the Site.
2024	Good/ Colour	Generally consistent with the previous image.	Generally consistent with the previous image although a road has been constructed on the vacant land to the west of the Site. Additionally, the warehouse to the east of the Site has finished construction.



4.4 HISTORICAL MAPS

A review of historical maps from the period 1937 to 1982 was undertaken – observations are presented in Table 4-5 whereas the maps are included in Appendix J.

Table 4-4 Review of Historical Maps

Date	Observations – On-site	Observations – Off-site
1937	The Site is part of a much larger vacant allotment. A windmill is marked along the northern site boundary, and vegetation is marked along the eastern boundary.	The surrounding area is divided into large allotments, with main roads (including Stebonheath and Womma Road) marked. Windmills and scattered vegetation is marked in the surrounding area. Main roads are marked in the areas to the north, west and east of the site. The suburb of Penfield is lies to the east.
1982	No site features are marked.	Much of the area to the north-east has been developed into Elizabeth North, with residential blocks, reserves, and a railway marked. Mini bike tracks are marked approximately 600 m south of the site. Several buildings are marked the south and north-west of the site. Quarries are marked in the area to the west of the site (>1 km away). Drainage channels area marked approximately 900 m north and south of the Site.

4.5 PREVIOUS INVESTIGATIONS (ON-SITE)

following reports were reviewed during the preparation of this PSI (refer to Appendix K):

- Tierra Environmental (2008) *Phase 1 Environmental Site Assessment Report – Penfield Industrial Land, Stebonheath Road, Playford* Prepared for the Land Management Corporation on 16 September 2008
- Land and Water Consulting (2018) *Preliminary Site Investigation- 317 Stebonheath Road, Edinburgh North, South Australia* Prepared for Renewal SA on 13 February 2018

Tierra Environmental (2008)

The report included a site history and a limited soil investigation for a large section of land bounded by Womma Road, Stebonheath Road, Bellchambers Road and vacant land to the west of the Site. The assessment area included the Site. The findings of the report that are relevant to the Site are summarised as follows:

- A stockpile of scrap metals and an old, decommissioned windmill was present adjacent Womma Road.
- A backfilled groundwater well was present in the north-eastern corner of the Site and was observed to be filled with soil, plastic, metal and green waste. Note that this well was identified in the DEWNR WaterConnect database search and by LWC during the recent site inspection.
- Tin sheds (identified as a livestock shelters) were observed in the north-western portion of the Site adjacent the drain. the area was also observed to contain some scrap metal, tyres, bricks and animal faeces.
- The then current lease holder of the site (farmer) was interviewed and advised that the larger site area (including the Site) had been used for cropping and grazing purposes.



- Based on the then available information, it was considered unlikely that potentially significant contamination existed across the Site with respect to future use of the Site for commercial/ industrial purposes.
- A limited soil investigation was undertaken in 2008 as part of the phase 1 report. The recovered soils comprised brown sandy clay and brown gravelly clayey sand material. Soil samples were collected at 10cm below the ground surface at two locations. The reported analytical results with comparison to current ASC NEPM (1999, as amended 2013) relevant human health and ecological protection guideline criteria for commercial/industrial land use are presented in Appendix K (note that historical results were compared against the NEPM (1999) criteria). Soil sample PEN4 was analysed for metals only and sample PEN5 was analysed for metals, cyanide, total recoverable hydrocarbons (TRH), monocyclic aromatic hydrocarbons (MAHs), organochlorine and organo-phosphorous pesticides (OCPs and OPPs), phenols and polychlorinated biphenols (PCBs). The reported concentrations were below laboratory limits of reporting and/ or relevant guideline criteria, where available.

Land and Water Consulting (2018)

This report included a site history review and site inspection for 317 Stebonheath Road, Edinburgh North (assessment area included the current Site (CT 5806/266) and the allotment to the south (CT 5797/995) which currently features the *Drakes Distribution Centre*. The findings of the report that are relevant to the Site are summarised as follows:

- A large swale/ open drain was present to the west of the Site. It appeared that the soil excavated during the construction of the swale was deposited on Site and was present as two piles along the western Site boundary.
- No soil staining or unexpected soils were observed however general rubbish was observed across the Site, concentrated along the site boundaries along the main roads.
- During the site inspection, some potentially asbestos containing material (PACM) was observed (predominantly on the south-western portion of the Site). The material comprised of pipes and large fragments.
- There were no signs of previous excavation works completed on-site, no surface water and no unusual odours. No existing or remanent building structures were observed on site.
- Potential activities undertaken at the Site which have the potential to contaminate (as per Schedule 3 of the EP Regulations, 2009) were considered to comprise of:
 - Agricultural activities;
 - Fill or soil importation; and
 - Asbestos (potential) and general waste dumping.
- Other Issues of Environmental Interest (IEI) included the potential impacts to soil based on the uncontrolled dumping of materials/ wastes was observed on Site.
- It was recommended that the PACM observed near the south-west and north-west portions of the Site be confirmed and all asbestos containing material removed from the Site by an appropriately experienced and/ or licenced contractor.
- Following the submission of the PSI, the identified PACM was recovered manually by field staff on the 19th and 20th of April 2018. 9.8 kg of PACM and one soil sample (taken from beneath a PACM fragment) was collected and sent to a NATA accredited laboratory for testing. The material was considered to be bonded asbestos material, in good condition and not easily crushed by hand. The laboratory results did not indicate any traces of asbestos fibres in the soil sample. A final site walkover was conducted across the entirety of the Site and no visual pieces of PACM were identified.



4.6 SITE HISTORY SUMMARY

A review of aerial imagery indicates that the Site remained largely undeveloped over time, and anecdotal information from Tierra Environmental (2008) states that the Site was used for agricultural activities such as cropping and cattle grazing. A drainage swale was excavated along the western site boundary between 2011 and 2013, and 2 large stockpiles of the excavated material was stored along the western portion of the Site.

A PSI report was completed by LWC in February 2018, which noted the large soil stockpiles, patches of surface waste and fragments of PACM. Following the PSI, the PACM was manually removed from the Site and a subsequent site inspection found no remaining visible PACM.

Around August 2018, the property to the south and a portion of the Site underwent clearing/leveling, and the *Drakes Distribution Centre* was constructed. During this period the stockpiles (of swale material) were moved, and 4 large stockpiles were now visible across the centre of the Site. It is expected that these stockpiles contain the swale material, and soil from the levelling of the Site. Aerial imagery indicates that the stockpiles moved locations around the Site between 2018 and 2019, however they don't appear to have been significantly changed. These stockpiles were observed during the 2024 Site inspection and appeared to comprise of gravelly clayey sand material.

Several smaller stockpiles containing bitumen, crushed concrete, bricks, rubber, and piping were transported to the Site between late 2023 and early 2024. This may coincide with the construction of the *McDonalds* on the Site's north-eastern corner (built between late 2021- 2023) but may also have come from another source.



5 REGULATORY RECORDS

5.1 SA EPA SECTION 7 RECORDS

The SA EPA records relevant to Section 7 of the *Land and Business (Sale and Conveyancing) Act 1994* were reviewed for information regarding the following:

- environmental performance agreements, protection orders, clean-up orders or clean-up authorisations;
- environmental assessment reports held by the SA EPA that had been prepared by or on behalf of an owner or occupier of the land, by the SA EPA, or by an Environmental Auditor (Contaminated Land);
- whether the Site is/was licensed by the EPA to operate as a waste depot;
- whether the Site is/was issued with a licence by the SA EPA to produce waste of a prescribed kind or to carry out an activity that produces a listed waste on the land; and
- records on the Public Register of waste being deposited on the land between 1 January 1983 and 30 April 1995.

The Section 7 records for the site (refer to Appendix L) indicate that, as of 4 November 2024, no such records exist for the Site.

5.2 SA EPA SITE CONTAMINATION INDEX

A review of the SA EPA site contamination index for records relevant to the Site and a 1 km buffer zone (Appendix L) indicated that there are no records associated with the Site itself. Notifications relating to off-site properties are summarised in Table 5-1, with additional information obtained from the SA EPA Public Register for properties within 150 m of the Site provided in Table 5-2 and Appendix M.

Table 5-1 SA EPA Site Contamination Index – 500 m radius

Notification No.	Type	Site Address	Activity	Distance (m)	Direction
61935 - 001	Audit report	Lot 321 Womma Road Eyre SA 5121	Service stations	21	North-east
61935	Audit Notification		Service stations		
61966 - 01	S83A Notification		Listed Substances (storage); Service stations		
61863	109 Nortification		Service stations		
61901 - 01	S83A Notification	16 Hewittson Road Edinburgh North SA 5113	Listed Substances (storage)	336	South-east
61901 - 02			Not recorded		
61355 - 11	S83A Notification	Various Road Verges PENFIELD SA 5121	Defence works; Fire stations; Fire training areas	360	North-west
61355 - 07	S83A Notification	Lot 802 Northwater Way, Burton & various road reserves EDINBURGH SA 5111	Defence works; Fire stations; Fire training areas	410	West
61355 - 04	S83A Notification	Lot 3001 West Avenue, Edinburgh; Lot 2 Waterloo Corner Road, Burton; Lot 102			



Notification No.	Type	Site Address	Activity	Distance (m)	Direction
		East Aenue, Edinburgh SA 5111			
61355 - 05	S83A Notification	Portion of Various Allotments EDINBURGH SA 5111			
61355 - 06	S83A Notification	Portion of Various Allotments and Road Verges EDINBURGH SA 5111			
17036	109 Notification	12 Hewittson Road EDINBURGH NORTH SA 5113	Not recorded	463	South-east
61542 - 01	S83A Notification		Listed Substances (storage)		

Table 5-2 SA EPA Public Register Information

Notification No	Address (distance from Site)	References	Information
61863 109 Notification	Lot 321 Womma Road Eyre SA 5121 21 m north east	Arris Pty Ltd (2015)	<p>This report states that the site operated as a Mobil Service Station from 1965 to 1999 and was sold to a property group in 2002.</p> <p><u>PPK Environment and Infrastructure (1999)</u> Past records indicated that soil testing and decommissioning was undertaken by PPK Environment and Infrastructure in 1999 (although no copies of the final assessment could be obtained from the council- only laboratory reports, facsimiles and statutory declarations). The decommissioning works included the submission of >30 soil samples to a NATA accredited laboratory. Arris' review of this laboratory data found exceedances of commercial/industrial criteria for TRH fractions, Xylenes and Toluene. Following this assessment 47.24 tonnes of low level contaminated soil material was excavated and removed to the Cleanaway Southern Waste Disposal depot on the 11th December 1999. An estimated 200 tonnes of clean fill was brought to the site.</p> <p>The City of Playford requested validation sampling and assessment be undertaken prior to any residential development.</p> <p>Validation sampling and assessment of potentially contaminated soil was undertaken in 2015 by Arris. 25 soil bores were extended from 1-4 m BGL, with greater depths targeting the former UST locations. The results suggested that no detectable hydrocarbons were present in site soils and the only lead in soil present was extremely low level and considered to be background concentrations. It was considered unlikely to have on Site implications.</p>
61935 Audit Notification	Lot 321 Womma Road Eyre SA 5121 21 m north east	BlueSphere Environmental Pty Ltd	An Audit was commenced on the 17 th of January 2018 following a draft DSI report from 2017 that identified TCE in groundwater samples from two on-site wells. The owner planned on developing the allotment for residential land use.
61966 - 01 S83A Notification	Lot 321 Womma Road Eyre SA 5121	LBW co Pty Ltd	<p>Section 83A notification (61966 – 01) was lodged for the Site on the 4th of April 2018 following an environmental site assessment.</p> <ul style="list-style-type: none"> Trace concentrations of trichloroethene, tetrachloroethene, chloroform, bromodichloromethane, & 1,2-dichloropropane were recorded in three on-site groundwater wells.



Notification No	Address (distance from Site)	References	Information
	21 m north east		<ul style="list-style-type: none"> The lateral extent of the plume was estimated to be >40m x 30 m on-site, with off-site impacts unknown. Vertical extent the plume was approximately 8.3- 8.5 m BGL, impacting the Q1 aquifer/ perched aquifer.
61935 - 001 Audit report	Lot 321 Womma Road Eyre SA 5121 21 m north-east	BlueSphere Environmental Pty Ltd	<ul style="list-style-type: none"> 3 groundwater wells were installed targeting a former wash bay, UST area and one up-hydraulic gradient. Two groundwater monitoring events were undertaken in November 2017 and March 2018. Interpreted groundwater elevation data by LBWco suggested that groundwater beneath the Site was flowing in a general westerly direction No hydrocarbon odours, sheens or apparent measurable thickness of light non-aqueous phase liquid (LNAPL) was observed Results from the March monitoring event resulted in the Section 82A notification. <p>The auditor did not consider the site to be a source of the trace concentrations of TCE, PCE, chloroform, 1,2-dichloropropane and bromodichloromethane. It was considered to be related to hydraulically up-gradient groundwater quality and unknown off-Site sources. It was stated that the groundwater contamination did not have any adverse impacts on the land use being considered at the Site, and provided that groundwater is not extracted for use, the risks to human health or the environment are negligible. Remediation was not deemed necessary to render the Site suitable for sensitive residential use or range of uses</p> <p>The auditor stated that the extent of the impacts (and associated risk) of the chlorinated hydrocarbons has not been fully assessed with regard to off-site. It was recommended the EPA consider further measures to ensure the nature and extent of the chlorinated hydrocarbons in groundwater in the surrounding area is fully assessed.</p>

5.3 SA EPA ENVIRONMENT PROTECTION AND CLEAN UP ORDERS

As listed in Appendix L and Table 5-3, three SA EPA Environment Protection or Clean Up Orders have been issued for properties located within 1 km of the Site – none of these are close enough to the Site to be considered a potential contamination issue.

Table 5-3 SA EPA Environment Protection and Clean Up Orders

Record No.	Record Type	Status	Entity	Site Address	Activity	Distance (m)	Direction
12623	Environment Protection Order	Issued	Exide Australia Pty Ltd	Barfield Road, Elizabeth West SA 5113	Reported visible emissions into the atmosphere from the site.	982	South-east
34570	Environment Protection Order	Closed	Marshall Power Australia Pty Ltd	43 Barfield Crescent, Edinburgh North SA 5113	Discharge of acids and/or acidic solutions into the public stormwater system.	982	South-east



Record No.	Record Type	Status	Entity	Site Address	Activity	Distance (m)	Direction
27150	Environment Protection Order	Issued	Chautagne Pty. Ltd.	Peachey Road, Elizabeth West SA 5112	Caused or permitted the receipt, storage and disposal of waste at the site, without an environmental authorization (license).	989	South-east

5.4 SA EPA AUTHORISATIONS AND APPLICATIONS

As shown in Appendix L, a total of thirty-eight SA EPA authorisation and application records have been listed for properties located within 1 km of the Site, with eleven located within 500 m of the Site (as summarised in Table 5-4).

The *Liberty Oil Edinburgh*, located 22 m east of the site lodged a licence application in 2020, and was issued on January 2023 (Appendix M).

Table 5-4 SA EPA Authorisations and Applications- 500 m radius

Record No.	Record Type	Status	Entity	Site Address	Activity	Distance (m)	Direction
LSL968 KB0U	Licence	Authorisation Updated	Liberty Oil Convenience Pty Ltd	109 Womma Road, Edinburgh North SA 5113	Petrol stations	22	East
50841	Licence application	Issued					
ENL0A 4YWR	Licence	Authorisation Updated	Andrash Womma Rd Pty Ltd	Allotment 8006, Womma Road, Eyre SA 5121	Petrol stations	230	North-west
51225	Licence	Issued					
1409	Licence application	Authorisation Updated	Century Products (S.A.) Proprietary Limited	95 Womma Road, Edinburgh North SA 5113	Abrasive blasting, Activity producing listed waste	242	East
51931	Licence	Issued			Concrete batching works		
15872	Licence	Issued	Hallett Concrete Pty. Ltd.				
414	Licence	Surrendered	Avery Dennison Materials Pty Ltd	Allotment 2, Hewittson Road, Elizabeth West SA	Activities producing listed wastes, Chemical storage and warehousing facilities, Fuel burning comprising the burning of fuel to stove enamel or to bake or dry substances releasing dust or air impurities	336	South-east
ENL48 R5HCU J	Licence application	Authorisation Updated	Joyce Foam Pty Ltd	12 Hewittson Road, Edinburgh North SA 5113	Chemical storage and warehousing facilities, Chemical works (organic)	463	South-east
51682	Licence	Issued					
15699	Licence	Surrendered			Activities producing listed wastes		



5.5 SA EPA ASSESSMENT AREAS AND GROUNDWATER PROHIBITION AREAS

As shown in Appendix L and summarised in Table 5-5, there are two SA EPA Assessment Areas or Groundwater Prohibition Areas located within 1 km of the Site.

Table 5-5 EPA Groundwater Prohibition Areas

Site Name	Distance (m)	Direction
Edinburgh Stage 1	859	South-west
Elizabeth South	861	South

5.6 WASTE MANAGEMENT FACILITIES

As detailed in Appendix N and Tables 5-6 and 5-7, there are multiple national waste management facilities or EPA approved container collection depots located within 1 km of the Site— none of which are close enough to the Site to be considered a potential contamination issue.

Table 5-6 Waste Management Facilities

Name	Address	Facility Type	Status	Distance (m)	Direction
Anglicare	Allotment 24 (Fp 130716) Ridgeway Road, Edinburgh North	E-Waste Drop-Off Facility	Operational	509	South
Foamex Sa	15 Peachey Road, Gepps Cross	Plastics Reprocessing Facility	Operational	772	South-East
Playford Transfer Station	Andrews Road, Penfield	Transfer Station	Operational	875	West
Edinburgh North Resource Recovery Centre	5 Bellchambers Road, Edinburgh North	Transfer Station	Operational	930	South-East
Scout Recycling Edinburgh North		Container Deposit Scheme Drop-Off Facility	Operational		
Nawma Material Recovery Facility		Transfer Station	-		
Exide Technologies	Peachey Rd, Edinburgh North	Metals Recovery Facility	Operational	982	South-East

Table 5-7 EPA Approved Container Collection Depot

Name	Address	Distance (m)	Direction
Scout Recycling Edinburgh North	5 Bellchambers Road, Edinburgh North	509	South



5.7 NATIONAL LIQUID FUEL FACILITIES

As detailed in Appendix N and Table 5-8, there is one national liquid fuel facility located within 1 km of the Site – not located close enough to the Site to be considered a potential contamination issue.

Table 5-8 National Liquid Fuel Facilities

Name	Address	Class	Status	Distance (m)	Direction
BP On The Run Davoren Park	41 Peachy Road	Petrol Station	Operational	887	East

5.8 HERITAGE

As shown in Appendix O, there are no National, SA Heritage Places or Aboriginal Land heritage listings located within 1 km of the Site. There is one Commonwealth Heritage record within 1 km of the Site as summarised in Table 5-9.

Table 5-9 Commonwealth Heritage List

Heritage Number	Location	Class	Name	Distance (m)	Direction
105326	Commercial Rd, Salisbury SA	Historic	Salisbury Explosives Factory (former)	908	South-west

5.9 PFAS INVESTIGATION AND MANAGEMENT PROGRAMS

As shown in Appendix P and Table 5-10, there is one Defence PFAS Investigation and Management Program Sites located within 1 km of the Site.

Table 5-10 Defence PFAS Investigation & Management Program Investigation Sites

Site Name	Address	Distance (m)	Direction
RAAF Base Edinburgh	Edinburgh, South Australia	487	South-west

5.10 DEFENCE CONTAMINATION INVESTIGATION PROGRAM

Although no National Unexploded Ordnance (UXO) records are located within 1 km of the Site, a property to the north-east is listed on the Defence 3 Year Regional Contamination Investigation Programs database, with respect to the RAAF base (refer to Appendix P and Table 5-11) – this is not located close enough to the Site to be considered a potential contamination issue.

Table 5-11 Defence 3 Year Regional Contamination Investigation Program (RCIP)

Base Name	Known Contamination	Distance (m)	Direction
RAAF Base Edinburgh	Yes	859	South-west



5.11 NATURAL HAZARDS

A review of the Bushfire and Prescribed Burns History Database was undertaken for an approximate 1 km radius around the Site, with two bushfire overlay records identified, as detailed Table 5-12 and Appendix Q. There are no records for actual bushfires or prescribed burns.

Flooding overlays located within 1 km of the Site are detailed in Table 5-13 and Appendix Q.

Table 5-12 Bushfire Overlays

Name	Description	Distance (m)	Direction
Bushfire – Urban Interface	This overlay seeks to ensure urban neighbourhoods adjoining bushfire risk areas allow access through to bushfire risk areas, are designed to protect life and property from the threat of bushfire and facilitate evacuation	On-site	
Bushfire – General	This overlay seeks to ensure development responds to the general level of bushfire risk by siting and designed buildings to mitigate threat and impact of bushfires on life and property and facilitate access for emergency services	286	West

Table 5-13 Flooding Overlays

Name	Description	Distance (m)	Direction
Hazards (Flooding)	The Hazards (Flooding) Overlay seeks to minimise flood hazard risk to people, property, infrastructure and the environment.	On-site	
Hazards (Flooding - General)	The Hazards (Flooding - General) Overlay seeks to minimise impacts of general flood risk through appropriate siting and design of development.	On-site	

5.12 ECOLOGICAL CONSTRAINTS

As shown in Appendix R, no native vegetation records are listed within 1 km of the Site.

A review of the Groundwater Dependent Ecosystems (GDE) Atlas database did not identify any potential GDE or Inflow Dependent Ecosystems (IDE), within a 1 km radius of the Site (refer to Appendix R).

No Ramsar wetlands are located within 1 km of the Site.

5.13 HISTORICAL MINES AND MINERAL DEPOSITS

As shown in Appendix S, there are no historical mines or mineral deposits identified within 1 km of the Site.

5.14 SUMMARY OF REGULATORY RECORDS

The regulatory records are no different to the records obtained during the previous site assessment completed in 2018 (i.e no further regulatory records of consequence, excluding records associated with Lot 321 Womma Road- discussed in Section 5.2 and 8.5).



6 SITE INSPECTION

6.1 SITE OBSERVATIONS

A Site inspection was undertaken by LWC personnel on 31 October 2024 – photographs taken during the Site inspection are provided in Appendix T, whereas the Site layout is shown in Figure 2 (attached). Key observations are provided in the following sections.

- The Site was fenced with an access gate and gravel driveway along the eastern boundary opening into the Site (Plate 1-3). Scattered rubbish was present along the eastern fence line comprising of soft plastics, Styrofoam and cardboard (Plate 4)
- The Site was generally flat with a grassy/ weed groundcover (Plate 5-7). A swale/ open drain is present along the western Site boundary (Plate 8).
- Extending north of the entrance gate onto the Site was a tree section comprising of Eucalyptus and She-oak trees to 2.5 m tall (Plate 9). Stumps of mature trees were present along the eastern boundary line. The tree section was littered with rubbish including glass bottles, wooden pallets, corrugated iron sheeting and plastic waste (Plate 10-12).
- Three stockpiles of wood chips were present along the south-eastern/ eastern portion of the site (Plate 13-15). Small soil stockpiles appearing to comprise of gravelly material with with brick fragments, soft plastics and organic material was present adjacent to the tree area (Plate 16-18). Patches concrete was present on the ground amongst the stockpiles (Plate 19)
- 4 large soil stockpiles (up to 6 m tall) were present on the central portion of the Site. The stockpiles appeared to comprise of clayey sandy material (Plates 20-22). A review of aerial imagery (Section 4.3) indicates this soil was stockpiled on the Site sometime during 2018, during the clearing and construction of the *Drakes Distribution Centre* that is present south of the Site. Additionally, two stockpiles identified in the previous site inspection (January 2018), comprising of soil removed during the construction of the adjacent swale was moved during this period, and may be present within the current stockpiles.
- Several smaller stockpiles of various materials were present along the eastern and southern edge of the large stockpiles. The majority of the stockpiles comprised of gravelly soil containing foreign materials including bitumen/ road base, crushed concrete, bricks, concrete, rubber and piping (Plates 23-30). A review of aerial imagery indicates these smaller stockpiles were likely transported to the Site in late 2023. This was shortly after the construction of the *McDonald's* that is present on the north-eastern corner but may have come from another source.
- A patch of illegal dumping was present along the southern site boundary with waste including clothing, soft and hard plastic, a wooden door, foam, broken glass, metal, tyres, hose, bricks and an empty L.P gas cylinder (Plate 31).
- Illegal dumping was also present along the northern side of the central soil stockpiles, with waste including broken flat screen TVs, demolition waste, ceramic tile, wooden planks, carpet, cardboard boxes, foam mattress and bed frame, hard and soft plastic, record player, corn oil drum, tree stumps and soil (Plate 32-33).
- *McDonalds Edinburgh* is present on the north-eastern corner of the Site (Plate 34).
- Eucalyptus and She-oak trees line the northern Site boundary (Plate 35-37). An old windmill frame and discarded waste material were found in the northern portion of the Site within the tree line. Waste



material included wire fencing, wood, corrugated iron, hose, rusted metal, twine, bricks, glass, bottles and hard and soft plastic (Plate 38-40)

- Multiple soil stockpiles were present along the south-western site boundary. The material appeared to comprise of gravelly clayey sand (Plate 41-42).
- Dumping was present along the western portion of the site with waste including a bookshelf, plastic waste, wire fencing, twine, empty bleach container, other containers and paint cans (Plate). The paint can was leaky and odourous (Plate 43-46)

6.2 SURROUNDING LAND USES

As detailed in Section 2.2, the observed surrounding land use was as follows:

- North – Womma Road, beyond which was residential land use (Plate 47). *Eyre Sports Park* and *AV Jennings* (property developers) to the north-west. A reserve with a drainage channel to the north-east (Plate 48- 49). An *X-Convenience* service station is present to the north-west, although it is located 230 m from the Site.
- East – Stebonheath Road, beyond which was a commercial/industrial precinct with some areas of vacant land. Business located directly beyond Stebonheath Road were identified to include:
 - *Liberty Oil Edinburgh*- 22 m east (Plate 50)
 - Warehouse- recently built and for lease (Plate 51)
 - *Allingtons Outpost Distribution Centre*- Country, western and workwear company (Plate 52)
- South- *Drakes Distribution Centre*, beyond which is vacant land (Plate 53).
- West – Drainage swale and vacant land (potentially used for agricultural purposes) (Plate 54).



7 SITE HISTORY

7.1 SUMMARY

Originally owned by a farmer and his wife since at least 1903, the Site changed ownership among various private individuals and companies. It passed through the hands of multiple property developers, including the South Australian Housing Trust in 1970, the South Australian Urban Projects Authority in 1996, and then the Land Management Corporation in 1998, which became the Urban Renewal Authority in 2000. In 2020, the property was acquired by its current owners, Brave Wholesalers Pty. Ltd.

A review of aerial imagery indicates that the Site remained largely undeveloped over time, and anecdotal information from Tierra Environmental (2008) states that the Site was used for agricultural activities such as cropping and cattle grazing. A drainage swale was excavated along the western site boundary between 2011 and 2013, and 2 large stockpiles of the excavated material was stored along the western portion of the Site.

A PSI report was completed by LWC in 2018, which noted the large soil stockpiles, patches of surface waste and fragments of PACM. Following the PSI, the PACM was manually removed from the Site and a subsequent site inspection found no remaining visible PACM.

During 2018, the property to the south and a portion of the Site underwent clearing, and the *Drakes Distribution Centre* was constructed. During this period 4 large soil stockpiles were transported to the Site. These stockpiles were observed during the 2024 Site inspection, along with several smaller stockpiles containing bitumen, crushed concrete, bricks, rubber, and piping, likely transported in late 2023. This may coincide with the construction of the *McDonalds* on the Site's north-eastern corner but may also have come from another source. Illegal dumping and litter was prevalent across the Site, including various household items as well as construction and demolition debris.

The land surrounding the Site has been developed for commercial, residential, recreational and agricultural land uses.

7.2 POTENTIALLY CONTAMINATING ACTIVITIES

7.2.1 On-site

With reference to Schedule 3 of the *Environment Protection Regulations 2023* and/or Schedule 1 of Practice Direction 14, the following PCAs have, or may have, historically occurred on the Site:

- although the Site was used for historical *agricultural activities* (i.e. livestock grazing and horticulture), this is only classified as a Class 2 PCA under Practice Direction 14 if it involved certain (specific) activities (i.e. burial of animals or parts of animals, burial of waste or other matter, irrigation using wastewater and/or intensive application or administration of a listed substance to animals, plants, land or water), none of which have been identified as occurring on the Site.
- part/s of the Site: *Importation of soil or fill material* (not classed as a PCA under Practice Direction 14)- with respect to several stockpiles present at the site.

In addition to the above, the following activities of potential interest have, or may have, occurred on the Site:

- use of asbestos containing building materials; and/or
- possible use of weedicides in unpaved areas.



A Construction Environmental Management Plan has been prepared for the Site and this would be sufficient to manage any unexpected finds in relation to the stockpiles or contents thereof, and to manage any potential environmental issues encountered during development to mixed sensitive/commercial land use.

7.2.2 Off-site

With respect to off-site PCAs, a 60 m buffer zone has been applied around the Site to meet the definition of 'adjacent land' provided in the *Planning, Development, and Infrastructure Act 2016*.

Although various commercial entities have been present in the surrounding area over time, the only potential PCA identified within 60 m of the Site is as follows:

- *Liberty Oil Edinburgh*- current service station located at 107-109 Womma Road (22 m east of the Site) – however this is a relatively new service station that was commissioned in 2021 and therefore we consider that this Class 1 PCA is unlikely to represent a source of contamination affecting the Site.
- *Eso Elizabeth West/ Mobil* – a former service station located at Lot 321 Womma Road between 1962 and 1999 (21 m north-east of the Site). This land was audited and is now residential land known as 19 and 21 Encounter Avenue, thus extremely unlikely to be an offsite source of contamination.



8 PRELIMINARY CONCEPTUAL SITE MODEL (CSM)

8.1 CONTEXT

As per the ASC NEPM (1999) and Part 5 of Practice Direction 14 (*Guidance associated with referral to EPA*), the development of a CSM is an essential part of the site assessment process.

8.2 POTENTIAL SOURCES

On-Site

With reference to Schedule 3 of the *Environment Protection Regulations 2023* and/or Schedule 1 of Practice Direction 14, the following PCAs have, or may have, historically occurred on the Site:

- although the Site was used for historical *agricultural activities* (i.e. livestock grazing and horticulture), this is only classified as a Class 2 PCA under Practice Direction 14 if it involved certain (specific) activities (i.e. burial of animals or parts of animals, burial of waste or other matter, irrigation using wastewater and/or intensive application or administration of a listed substance to animals, plants, land or water), none of which have been identified as occurring on the Site.
- part/s of the Site: *Importation of soil or fill material* (not classed as a PCA under Practice Direction 14) with respect to several stockpiles present at the site. The large stockpiles appeared to comprise of clayey sand material and the smaller stockpiles comprised of various gravelly material, containing foreign objects such as bitumen/ road base, crushed concrete, bricks, concrete, rubber and piping.

In addition to the above, the following activities of potential interest have, or may have, occurred on the Site:

- use of asbestos containing building materials- PACM was observed at the Site (and adjacent property to the south) by LWC personnel whilst conducting a Site inspection in 2018 (As detailed in Section 4.5). The PACM was manually removed from the surface of the Site in April 2018, and a final site walkover did not identify any visual pieces of PACM. No sub-surface asbestos investigation was commissioned nor was the Site inspected by SafeWork South Australia Asbestos Inspector or a clearance certificate issued. No PACM was observed during the Site inspection conducted by LWC personnel in 2024. It is also noted that the majority of the PACM was located on the property to the south of the Site (currently the *Drakes Distribution Centre*).
- possible use of weedicides in unpaved areas.

Off-Site

With respect to off-site PCAs, a 60 m buffer zone has been applied around the Site to meet the definition of 'adjacent land' provided in the *Planning, Development, and Infrastructure Act 2016*.

Although various commercial entities have been present in the surrounding area over time, the only potential PCAs identified within 60 m of the Site are as follows:

- *Liberty Oil Edinburgh*- current service station located at 107-109 Womma Road (22 m east of the Site) – however this is a relatively new service station that was commissioned in 2021 and therefore we consider that this Class 1 PCA is unlikely to represent a source of contamination affecting the Site.



- *Esso Elizabeth West/ Mobil* – a former service station located at Lot 321 Womma Road between 1962 and 1999 (21 m north-east of the Site). This land was audited and is now residential land known as 19 and 21 Encounter Avenue, thus extremely unlikely to be an offsite source of contamination.

8.3 POTENTIAL RECEPTORS

The following potential receptors are based on the proposed redevelopment of the Site for mixed sensitive/commercial use:

- future users of the Site (workers and visitors);
- future on-and off-site construction/maintenance workers;
- on-site terrestrial ecosystems; and
- the uppermost groundwater aquifer beneath the Site

Since no significant potential sources of contamination have been identified on the Site it is considered unlikely to represent a source of off-site impact, off-site receptors are not considered relevant.

8.4 POTENTIAL TRANSPORT MECHANISMS & EXPOSURE PATHWAYS

Contaminant transport mechanisms can include the following:

- leaching of chemical substances from soil to groundwater;
- lateral migration of chemical substances in groundwater and discharge to surface water;
- generation of dust containing chemical substances from disturbance of exposed surface soils; and
- upward migration of vapour to indoor/outdoor air from soil and/or groundwater containing chemical substances.

The potential exposure pathways linking sources to future receptors are consistent with those pathways used to derive the ASC NEPM (1999) human and ecological investigation/screening levels and include the following:

Human exposure pathways:

- dermal contact with soil, groundwater and/or surface water containing chemical substances;
- incidental or purposeful (i.e. pica behaviour by young children) ingestion of soil containing chemical substances;
- incidental or purposeful ingestion of groundwater containing chemical substances;
- incidental ingestion/inhalation of dust containing chemical substances; and
- inhalation of volatile chemical substances (as soil vapour) from soil and/or groundwater containing chemical substances.

Ecological exposure pathways:

- direct contact with soil, groundwater and/or surface water containing chemical substances (terrestrial, aquatic and avian fauna); and



- translocation of chemical substances from impacted soil and/or groundwater via plant roots (flora).

8.5 LINKAGES

A risk may only eventuate where all three elements of the CSM are present – i.e. a source, a valid receptor and a pathway connecting the source to the receptor. Where these three elements are present, a complete exposure pathway or 'linkage' is formed. Potential linkages are listed in Table 8-1.

Table 8-1 Identification and Discussion of Potential Linkages

Potential Source/s	Receptor	Pathway	Potentially complete?	Linkage
Off-site current and former service Stations	Future users of the Site	Dermal contact with and/or incidental ingestion of impacted soils Inhalation of dust generated from impacted soils	UNLIKELY Significant surface or near surface soil impacts are not likely to be present in association with an offsite source. <ul style="list-style-type: none"> <i>Liberty Oil Edinburgh</i>- current service station located at 107-109 Womma Road (22 m east of the Site) – however this is a relatively new service station that was commissioned in 2021 and therefore we consider that this Class 1 PCA is unlikely to represent a source of contamination affecting the Site. <i>Esso Elizabeth West/ Mobil</i> – a former service station located at Lot 321 Womma Road between 1962 and 1999 (21 m north-east of the Site). This land was audited and is now residential land known as 19 and 21 Encounter Avenue, thus extremely unlikely to be an offsite source contamination. 	L1
		Dermal contact with and/or incidental ingestion of impacted groundwater	UNLIKELY Refer above rationale	L2
		Inhalation of soil vapour (generated from impacted groundwater)	UNLIKELY Refer above rationale	L3
Off-site service station	Future construction/ maintenance workers	Dermal contact with and/or incidental ingestion of impacted soils	UNLIKELY Refer above rationale	L4



Potential Source/s	Receptor	Pathway	Potentially complete?	Linkage
		Inhalation of dust generated from impacted soils		
		Dermal contact with and/or incidental ingestion of groundwater	UNLIKELY Refer above rationale	L5
		Inhalation of soil vapour (generated from impacted groundwater)		
Off-site service station	Terrestrial ecosystems – fauna and flora	Direct contact with impacted soils Translocation of chemical substances into plants via roots	UNLIKELY Refer above rationale	L6
Off-site service station	The uppermost groundwater aquifer beneath the Site	Lateral migration of contaminants from off-site source/s	UNLIKELY Refer above rationale	L7



9 CONCLUSIONS & RECOMMENDATIONS

9.1 GENERAL CONCLUSIONS

The following conclusions are based on the results of the recent PSI undertaken for the Site, taking into account its proposed development for mixed sensitive/commercial use:

- Originally owned by a farmer and his wife since at least 1903, the Site changed ownership over the years among various private individuals and companies. It passed through the hands of multiple property developers, including the South Australian Housing Trust in 1970, the South Australian Urban Projects Authority in 1996, and then the Land Management Corporation in 1998, which became the Urban Renewal Authority in 2000. In 2020, the property was acquired by its current owners, Brave Wholesalers Pty. Ltd.
- A review of aerial imagery indicates that the Site remained largely undeveloped over time, and anecdotal information from Tierra Environmental (2008) states that the Site was used for agricultural activities such as cropping and cattle grazing. The Site is largely vacant with groundcover consisting of low grasses and weeds. The Site is fenced with a gated gravel driveway for access, and primarily flat. Tree-lined sections on the eastern and northern boundaries feature Eucalyptus and She-oak trees.
- A drainage swale was excavated along the western site boundary between 2011 and 2013, and 2 large stockpiles of the excavated material was stored along the western portion of the Site.
- A PSI report was completed by LWC in 2018, which noted the large soil stockpiles, patches of surface waste and fragments of PACM. Following the PSI, the PACM was manually removed from the Site and a subsequent site inspection found no remaining visible PACM.
- During 2018, the property to the south and a portion of the Site underwent clearing, and the Drakes Distribution Centre was constructed. During this period 4 large soil stockpiles were transported to the Site. These stockpiles were observed during the 2024 Site inspection, along with several smaller stockpiles containing bitumen, crushed concrete, bricks, rubber, and piping, likely transported in late 2023. This may coincide with the construction of the McDonalds on the Site's north-eastern corner but may also have come from another source.
- Illegal dumping and litter were prevalent across the Site, with discarded items including household waste such as broken televisions, furniture, carpets, clothing, foam mattresses, a bed frame, and cardboard boxes. Construction and demolition debris, including ceramic tiles, wooden planks, bricks, and corrugated iron are scattered throughout. Other waste includes hard and soft plastics, glass bottles, broken glass, a wooden door, metal, tyres, hoses, wire fencing, a bleach container, empty paint cans, an L.P. gas cylinder, and an old corn oil drum. It is noted that a paint can was leaky and odorous.
- The land surrounding the Site has been developed for commercial, residential, recreational and agricultural land uses.
- With reference to Schedule 3 of the *Environment Protection Regulations 2023* and/or Schedule 1 of Practice Direction 14, the following PCAs have, or may have, historically occurred on the Site:
 - Although the Site was used for historical agricultural activities (i.e. livestock grazing and horticulture), this is only classified as a Class 2 PCA under Practice Direction 14 if it involved certain (specific) activities (i.e. burial of animals or parts of animals, burial of waste or other matter, irrigation using wastewater and/or intensive application or administration of a listed substance to animals, plants, land or water), none of which have been identified as occurring on the Site.



- whole or part/s of the Site: *Importation of soil or fill material* (not classed as a PCA under Practice Direction 14). A Construction Environmental Management Plan has been prepared for the Site and this would be sufficient to manage any unexpected finds in relation to the stockpiles or contents thereof, and to manage and potential environmental issues encountered during development to commercial land use.
- In addition to the above, the following activities of potential interest have, or may have, occurred on the Site:
 - use of asbestos containing building materials; and/or
 - possible use of weedicides in unpaved areas.
- For the purposes of Practice Direction 14, which specifies that only Class 1 activities undertaken within 60 m of the Site need to be considered, the following PCAs have been identified.
 - *Liberty Oil Edinburgh*- current service station located at 107-109 Womma Road (22 m east of the Site) – however this is a relatively new service station that was commissioned in 2021 and therefore we consider that this Class 1 PCA is unlikely to represent a source of contamination affecting the Site.
 - *Esso Elizabeth West/ Mobil* – a former service station located at Lot 321 Womma Road between 1962 and 1999 (21 m north-east of the Site). This land was audited and is now residential land known as 19 and 21 Encounter Avenue, thus extremely unlikely to be an offsite source of contamination.

With respect to the proposed future development/use of the Site for mixed sensitive (childcare centre) and commercial (fast-food and retail) purposes, the preliminary Conceptual Site Model (CSM) did not identify potentially complete exposure pathways and linkages.

9.1 SITE CONTAMINATION FOR THE PURPOSES OF PRACTICE DIRECTION 14

For the purposes of Schedule 2 of Practice Direction 14, site contamination (as defined in Section 5B of the *Environment Protection Act 1993*) **may exist** with respect to the proposed commercial land use – i.e. with respect to the historical Class 1 PCA located 21 m north and current Class 1 PCA located 22 m east, though these are considered to be trivial and unlikely to represent a significant potential of significant harm to future use/ users of the Site.

Additionally, it is noted that the proposed sensitive development (childcare centre) is to be located on the north-western corner of the Site, approximately 160 m from historical Class 1 PCA and 220 m from current Class 1 PCA (at its closest point).

A Construction Environmental Management Plan has been prepared for the Site and this would be sufficient to manage any unexpected finds and to manage and potential environmental issues encountered during development to mixed sensitive/commercial land use.

Please refer to the Statement of Limitations associated with this report, as presented in Appendix V.



A Summary of Practice Direction 14 outcomes is summarised in Table 9-1

Table 9-1 Practice Direction 14 Schedule 2 Summary to Assist with Referral Determination

Trigger for Referral to the Environment Protection Authority	Yes	No	Detail
Class 1 Potentially Contaminating Activity (PCA) on site		✓	
Class 1 PCA offsite but within 60 m of the site	✓		<p><i>Liberty Oil Edinburgh</i>- current service station located at 107-109 Womma Road (22 m east of the Site) – however this is a relatively new service station that was commissioned in 2021 and therefore we consider that this Class 1 PCA is unlikely to represent a source of contamination affecting the Site.</p> <p><i>Esso Elizabeth West/ Mobil</i> – a former service station located at Lot 321 Womma Road between 1962 and 1999 (21 m north-east of the Site). This land was audited and is now residential land known as 19 and 21 Encounter Avenue, thus extremely unlikely to be an offsite source of contamination.</p>
Class 2 PCA on site and proposed use is a sensitive use	✓		Although the Site was used for historical agricultural activities (i.e. livestock grazing and horticulture), this is only classified as a Class 2 PCA if it involved certain (specific) activities (i.e. burial of animals or parts of animals, burial of waste or other matter, irrigation using wastewater and/or intensive application or administration of a listed substance to animals, plants, land or water), none of which have been identified as occurring on the Site.
Section 83A on site		✓	
Section 83A within 60 m of the Site	✓		Trace concentrations of trichloroethene, tetrachloroethene, chloroform, bromodichloromethane, & 1,2-dichloropropane were recorded in three on-site groundwater wells at the site of a former service station (Lot 321 Womma Road). The Site was audited in 2018 and is now residential land, thus extremely unlikely to be an offsite source of contamination.
Site is within a Groundwater Prohibition Area		✓	
Site is included within a Notated Site Contamination Audit Report		✓	
Based on the above responses, Site contamination is:			



Likely to exist at the Site		✓	
May exist at the Site	✓		With respect to the historical Class 1 PCA located 21 m north and current Class 1 PCA located 22 m east, though these are considered to be trivial and unlikely to represent a significant potential of significant harm to future use/ users of the Site.
Unlikely to exist at the Site		✓	

A completed Practice Direction Schedule 2 document is included in Appendix U.



10 REFERENCES

CSIRO Australian Soil Resource Information System (ASRIS) website:

<http://www.asris.csiro.au/mapping/viewer.htm>.

Department for Environment and Water (2024) WaterConnect database:

<https://www.waterconnect.sa.gov.au/Systems/GD/Pages/Default.aspx>.

Development Act 1993.

Environment Protection Act 1993.

Environment Protection Regulations 2023.

Environment Protection (Water Quality) Policy 2015.

Land and Business (Sale and Conveyancing) Act 1994.

Land Services SA South Australian Integrated Land Information System (SAILIS) website:

<https://sailis.lssa.com.au/home>.

Location SA MapViewer: <http://location.sa.gov.au/viewer/>.

National Environment Protection (Assessment of Site Contamination) Measure 1999 (amended in 2013).

Planning, Development and Infrastructure Act 2016.

Planning, Development and Infrastructure (General) Regulations 2017

SA EPA Site Contamination Index: https://www.epa.sa.gov.au/public_register/site_contamination_index.

SA EPA (2019) *Guidelines for the Assessment and Remediation of Site Contamination*.

South Australian Property and Planning Atlas website: <https://sappa.plan.sa.gov.au/>.

State Planning Commission (2021) *Practice Direction 14 (Site Contamination Assessment 2021, amended in 2023).*

Refer also to Appendix W for a list of the databases accessed by Lotsearch.

OFFICIAL



Environment Protection Authority
GPO Box 2607 Adelaide SA 5001
211 Victoria Square Adelaide SA 5000
T (08) 8204 2004
Country areas 1800 623 445

EPA Reference: PDI 1176

15 May 2025

City of Playford
12 Bishopstone Road
DAVOREN PARK SA 5113
asimons@playford.sa.gov.au

Dear Andrew Simons

EPA Development Application Referral Response

Development Application Number	25005488
Applicant	Leyton Property Pty Ltd c/- URPS
Location	17 Stebonheath Rd, Edinburgh North SA 5113 (CT 6246/490)
Proposal	Child care facility with associated car parking, landscaping and illuminated signage including a pylon sign to 4.6m height

This development application ('DA') was referred to the Environment Protection Authority ('EPA') by the Assessment Panel at City of Playford in accordance with section 122 of the *Planning, Development and Infrastructure Act 2016*, Schedule 9(3)(9A) of the *Planning, Development and Infrastructure (General) Regulations 2017* and Part 9.1 of the *Planning and Design Code*.

The following response is provided in accordance with section 122(5)(b)(ii) of the *Planning, Development and Infrastructure Act*.

PROPOSAL

This DA proposes a change in the use of land to a more sensitive use as determined by the relevant authority after consideration of the Land Use Sensitivity Hierarchy of the [State Planning Commission Practice Direction 14 \(Site Contamination Assessment\) 2021](#) ('Practice Direction 14').

The EPA notes that the subject site is currently vacant and has been used historically for agricultural purposes. The DA proposes the construction of a childcare facility with associated carparking and landscaping.

The Site Contamination Declaration Form ('SCDF') submitted with the DA (prepared by James Fox of Land and Water Consulting and dated 10 January 2025) identifies site contamination exists or may exist as a result of the following potentially contaminating activities ('PCAs'):

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- Onsite:
 - Historical agricultural activities (Class 2 PCA), and
- On adjacent land:
 - Service stations (Class 1 PCA).

SITE CONTAMINATION ASSESSMENT

The purpose of this referral is to ensure that an appropriate and proportionate assessment of site contamination occurs to ensure land is suitable, or can be made suitable, for the proposed use. Through the referral, the EPA provides direction to the relevant authority on whether they must consider the advice of either a site contamination consultant or a site contamination auditor regarding site suitability.

The EPA's [Site contamination referral decision-making framework](#) describes how the EPA makes decisions on referred DAs and outlines the preconditions which must exist for a site contamination audit ('audit').

The EPA has undertaken a review of the following site contamination information provided with the DA:

- *Preliminary Site Investigation, 317 Stenbonheath Road, Edinburgh North, South Australia* dated 10 January 2025, prepared by Land & Water Consulting ('the PSI report'), and
- *Construction Environmental Management Plan, 17 Stebonheath Road, Edinburgh North* dated 13 November 2024, prepared by Land & Water Consulting ('the CEMP report').

The following report was subsequently provided in response to the EPA's request for further information and has also been reviewed:

- *Preliminary Site Investigation and Limited Soil Investigation, 317 Stenbonheath Road, Edinburgh North, South Australia*, dated 7 April 2025, prepared by Land & Water Consulting ('the updated PSI report').

The EPA has reviewed and considered the above reports taking into account the relevant guidance provided in the *National Environment Protection (Assessment of site contamination) Measure 1999* and the EPA's [Guidelines for the assessment and remediation of site contamination \(2019\)](#). The EPA has also considered other information considered to be directly relevant to the application and proposed change in land use.

The EPA notes the following in relation to the reviewed information:

- The updated PSI report indicates that all analysed concentrations of chemical substances were below the adopted criteria for assessing potential risk to human health or the environment under the proposed sensitive land use scenario.
- The conceptual site model ('CSM') in the updated PSI report identifies no complete source-pathway-receptor linkages, based on the proposed use.
- A Construction Environmental Management Plan ('CEMP') has been prepared for the site and appears sufficient to manage any unexpected finds and to manage and potential environmental issues encountered during development.

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The EPA notes that the pre-conditions for an audit do not exist, taking into account:

- site contamination is not considered to exist
- realistic human health exposure pathways have not been identified based on the proposed land use, and
- remediation is not, or does not remain, necessary to mitigate exposure risk based on the proposed land use.

CONCLUSION

Based on the information submitted with the DA and the information held by the EPA, the EPA is satisfied that the site could be made suitable for the proposed use subject to the directed conditions below. Further, a site contamination consultant is the most appropriate site contamination professional to determine site suitability.

DIRECTION

The relevant authority is directed to attach the following condition to any approval:

1. A certificate of occupancy must not be granted in relation to a building on the relevant site until a statement of site suitability (in the form described by *Practice Direction 14: Site Contamination Assessment 2021*) is issued by a site contamination consultant certifying the land is suitable for the proposed use.

The following note provides important information in relation to the development and is requested to be included in any approval:

- The applicant/owner/operator is reminded of the general environmental duty, as required by section 25 of the *Environment Protection Act 1993*, to take all reasonable and practicable measures to ensure that activities on the site and associated with the site (including during construction) do not pollute the environment in a way which causes or may cause environmental harm.

If you have any questions about this response, please contact Alexandra Margetts on (08) 8204 2129 or email alexandra.margetts@sa.gov.au.

Yours faithfully

Melissa Chrystal
Delegate
ENVIRONMENT PROTECTION AUTHORITY

Referral Snapshot

Development Application number:
25005488

Consent:
Planning Consent

Relevant authority:
Assessment Panel at City of Playford

Consent type for distribution:

Referral body:
Commissioner of Highways

Response type:
Schedule 9 (3)(7) Development Affecting Transport Routes and Corridors

Referral type:
Direction

Response date:
18 Jun 2025

Advice:
With comments, conditions and/or notes

Condition 1
All access to/from the development shall be gained in accordance with the Site and Floor Plan produced by BELL Architecture, Drawing No. DD0002, Rev. D, Dated 26.02.2025.

Condition 2
The access to Womma Road shall be in accordance with DA 2402350. All works associated with the access points shall be completed prior to the operation of the development.

Condition 3

In the event that Womma Road is widened and the operation of the access to the subject development from the main internal circulation aisle shall be reviewed to ensure that vehicles turning right into the subject development do not affect the free flow of traffic into the site. This may require the restriction of right turns into the subject development from the main internal circulation aisle.

Condition 4

The first two car parking spaces adjacent to the access to the main internal circulation aisle shall be limited to staff parking only. These spaces shall be signed/linemarked to reinforce their operation.

Condition 5

Any infrastructure within the road reserve that is demolished, altered, removed or damaged during the construction of the project shall be reinstated to the satisfaction of the relevant asset owner, with all costs being borne by the applicant.

Condition 6

All parking shall be designed and constructed in accordance with AS/NZS 2890.1:2004 and AS/NZS 2890.6:2022 with all commercial vehicle facilities being designed in accordance with AS2890.2-2018.

Condition 7

Prior to commencement of construction a final stormwater management plan (including DRAINS modelling) shall be developed in conjunction with DIT and Council and be in accordance with DIT Master Specification RD-DK-D1 Road Drainage Design and other relevant guidelines. The point/s of discharge shall be confirmed and the pre and post development peak discharge to any DIT infrastructure is to be confirmed during detailed design. All drainage infrastructure is to be to the satisfaction of DIT and Council.

Condition 8

No stormwater from this development is permitted to discharge on-surface to Womma Road. In addition, any existing drainage of the road shall be accommodated by the development and any alterations to road drainage infrastructure as a result of this development shall be at the expense of the developer.

Advisory Note 1

The Metropolitan Adelaide Road Widening Plan shows that a strip of land 7.45 metres in width may be required from the Womma Road frontage of the site for possible future road purposes. The consent of the Commissioner of Highways under the Metropolitan Adelaide Road Widening Plan Act 1972 is

required to all new building works located on or within 6 metres of the possible requirement.

The attached consent form should be completed by the applicant and returned to DIT (dit.landusecoordination@sa.gov.au), together with a copy of the Decision Notification Form and the approved site plan/s.

Advisory Note 2

Should traffic flows on Womma Road be impacted during the construction phase of the development, the applicant is required to obtain approval from DIT's Traffic Management Centre - Roadworks (TMC) for the implementation of a traffic management plan. Before any construction works the contractor(s) will be required to complete a 'Notification of Works' form via the following link:

https://www.dit.sa.gov.au/contractor_documents/works_on_roads_by_other_organisations

OUTSTANDING MATTERS – APPEALS AND DEFERRED ITEMS

10.1 WAREHOUSE AND LIGHT INDUSTRY DEVELOPMENT WITH ADVERTISEMENT AND ASSOCIATED DETENTION BASIN, CAR PARKING, LANDSCAPING AND REGULATED AND SIGNIFICANT TREE REMOVALS

Contact Person: Rhiya Singh

Why is this matter before the Council Assessment Panel?

Outstanding Matters – Appeals and Deferred Items

Purpose

For the Council Assessment Panel to make a determination on whether to deal with this matter in confidence.

A. PANEL TO MOVE MOTION TO GO INTO CONFIDENCE

STAFF RECOMMENDATION

Pursuant to Part 3, 13(2)(a)(vi) & (ix) of the *Planning, Development and Infrastructure (General) Regulations 2017*, provision is made for the exclusion of the public from the meeting in such situations, with the exception of:

- Assessment Manager
- Manager Planning Services
- Principal Planner – Major Projects
- Senior Development Officer – Planning
- Development Officer – Planning
- Governance Support
- ICT Support
- Minute Taker

in order to consider in confidence agenda item 10.1 under Part 3, 13(2)(a) of the *Planning, Development and Infrastructure (General) Regulations 2017* on the basis that:

- (vi) information the disclosure of which could reasonably be expected to prejudice the maintenance of law, including by affecting (or potentially affecting) the prevention, detection or investigation of a criminal offence, or the right to a fair trial
- (ix) information relating to actual litigation, or litigation that the assessment panel believes on reasonable grounds will take place

This matter is confidential because this agenda item relates to an ongoing appeal between the appellant and the Council Assessment Panel. As an ongoing appeal, this is a confidential matter between parties and the public discussion of such matters has the potential to impact the appellants right to a fair trial and relates to ongoing litigation.

On the basis of this information, the principle that meetings should be conducted in a place open to the public has been outweighed in this instance; the Panel consider it necessary to consider this matter in confidence.

Section B below to be discussed in the confidential section of the agenda once the meeting moves into confidence for each item.

B. The Matters as per item 10.1

C. PANEL TO DECIDE HOW LONG ITEM 10.1 IS TO BE KEPT IN CONFIDENCE**Purpose**

To resolve how long agenda item 10.1 is to be kept confidential.

STAFF RECOMMENDATION

Pursuant to Part 3, 14(4) of the *Planning, Development and Infrastructure (General) Regulations 2017*, the Panel orders that the following aspects of Item 10.1 be kept confidential, in accordance with Panel's reasons to deal with this item in confidence pursuant to Part 3, 13(2)(a)(vi) & (ix) of the *Planning, Development and Infrastructure (General) Regulations 2017*:

- Report for Item 10.1
- Attachments for Item 10.1
- Minutes for Item 10.1

other than where required to be released in the management of the Environment Resources and Development Court proceedings, at the discretion of the Assessment Manager.