



Port Augusta
CITY COUNCIL



Port Pirie
Regional Council



UNEARTH
WHYALLA

AGENDA

UPPER SPENCER GULF REGIONAL ASSESSMENT PANEL

**Civic Conference Room, Whyalla City Council,
21 Grundel St, Whyalla Norrie,
Wednesday 29 January 2025,
commencing at 5.30pm.**



Port Augusta
CITY COUNCIL



**UNEARTH
WHYALLA**

AGENDA

UPPER SPENCER GULF REGIONAL ASSESSMENT PANEL

Notice is hereby given that a meeting of the Upper Spencer Gulf Regional Assessment Panel will be held on Wednesday 29 January 2025, Civic Conference Room, Whyalla City Council Building, 21 Grundle Street, Whyalla Norrie, commencing at 5.30pm.

Jodie Perone
ASSESSMENT MANAGER
23 January 2025

1. **Welcome – Stewart Payne, Presiding Member**

2. **Present**

3. **Apologies**

Nil

4. **Confirmation of Minutes**

That the minutes of meeting held on 17 September 2024 be received and adopted.

5. **Business Arising from the Previous Minutes**

6. **Conflict of Interest Declarations**

7. Officer Reports

7.1 Development Application 24023329

Page 3

RV park with 28 sites with a limited stay up to 48 hours; 18618 Augusta Hwy
Winninowie SA 5700

7.1.1 One (1) representor wishes to be heard.

8. Other business

9. Close

DEVELOPMENT NO.:	24023329
APPLICANT:	Nathan Mahoney
ADDRESS:	18618 AUGUSTA HWY WINNINOWIE SA 5700
NATURE OF DEVELOPMENT:	The proposal involves a change of land use to caravan and tourist park for RV's comprising 28 sites, internal access roads and limited stay up to 48 hours in conjunction with an existing residence, associated water storage tanks for potable water and firefighting purposes, and sillage point for disposal of effluent.
ZONING INFORMATION:	Zones: • Rural Overlays: • Hazards (Bushfire - Regional) • Hazards (Flooding - Evidence Required) • Key Outback and Rural Routes • Key Railway Crossings • Native Vegetation • Water Resources Technical Numeric Variations (TNVs): • Minimum Site Area (Minimum site area is 40 ha) • Minimum Dwelling Allotment Size (Minimum dwelling allotment size is 20 ha)
LODGEMENT DATE:	11 Sept 2024
RELEVANT AUTHORITY:	Regional assessment panel/Assessment manager at Upper Spencer Gulf Regional Assessment Panel
PLANNING & DESIGN CODE VERSION:	P&D Code (in effect) Version 2024.16 29/8/2024
CATEGORY OF DEVELOPMENT:	Code Assessed - Performance Assessed
NOTIFICATION:	Yes – Caravan and Tourist Park not listed under Table 5 - Procedural Matters (PM) - Notification
RECOMMENDING OFFICER:	Sampurna Sikdar (Planning Officer) – Endorsed by Henri Mueller (Manager Growth and Regulatory)
REFERRALS STATUTORY:	Commissioner of Highways Native Vegetation Council
REFERRALS NON-STATUTORY:	Janine Hugo Isireli Koyamaibole

ATTACHMENTS:

ATTACHMENT 1: Subject Land Map

ATTACHMENT 2: Zoning Map

ATTACHMENT 3: Application Documents - Plans

ATTACHMENT 4: Representations

ATTACHMENT 5: Response to Representations

ATTACHMENT 6: Internal Referral Advice

DETAILED DESCRIPTION OF PROPOSAL:

The proposed development is for a caravan and tourist park comprising 28 caravan sites located at the southern end of the 22-hectare property. The park will exclusively accommodate self-sufficient caravans and RVs, as it will only feature limited amenities such as potable water points, designated dump stations for caravans and RVs, 20,000 litre water tanks with firefighting fittings.

BACKGROUND:

The proposed caravan park will feature 28 caravan sites with limited facilities, including three potable water points, one Ezy Dump station, a 22,000-liter water tank equipped with firefighting fittings. The park will exclusively accommodate self-sufficient caravans and RVs. Additionally, the applicant plans to plant 100 Quandong trees and eventually offer visitors guided tours of the plantation through bush track.

The caravan park is proposed at the southern end of the property, with access from Horrocks Pass Road. The landowner's residence is located at the northern end of the property, with current access via Augusta Highway. This access will be permanently closed once the Horrocks Pass Road access becomes operational, as directed by the Department of Infrastructure and Transportation (DIT).

To encourage turnover and support diversification, the applicant proposes limiting each visitor's stay to a maximum of 48 hours.

SUBJECT LAND & LOCALITY:





Figure 1 - Aerial photograph of site



Figure 2 – Front view of the property from Horrocks Pass Road

Site Description: The site is located within the Rural Zone, spanning approximately 22 hectares with dimensions of approximately 1.3 km by 0.14 km. The terrain is relatively flat, with a slight incline of 1.4% along the shorter side.

The surrounding area primarily consists of low-density residential properties, mostly vacant plots, and the Port Augusta Wind Farm. The nearest residence is approximately 1.5 km from the proposed caravan park. On the subject land, a detached dwelling is situated at the northern end of the property, with access directly from Augusta Highway. The proposed caravan park is located at the southern end, with planned access from Horrocks Pass Road.

The broader locality is characterized by predominantly vacant rural lands, with wind turbines surrounding the site from the northwest to the eastern side of the property.

Location reference: 18618 Augusta Hwy Winninowie SA 5700

Title ref.: CT 6183/913 **Plan Parcel:** F199723 QP92 **Council:** Port Augusta City Council

CONSENT TYPE REQUIRED:

Planning Consent

CATEGORY OF DEVELOPMENT:

- **PER ELEMENT:**
Other - Commercial/Industrial - Caravan and Tourist Park: Code Assessed - Performance Assessed
- **OVERALL APPLICATION CATEGORY:**
Code Assessed - Performance Assessed
- **REASON**
P&D Code; The proposed development is not categorised under Table 1 or 2 in Rural Zone.

PUBLIC NOTIFICATION

- **REASON**

Caravan Park is not exempt from public notification in Rural Zone

- **LIST OF REPRESENTATIONS**

Date received	Given Name	Address	Email	Phone	Represented by	Wish to be heard
13 Nov 2024	Mica Balela	GPO Box 1047, Adelaide SA 5001	mica.balela@sa.gov.au	0421033144	-	No
13 Nov 2024	Kate Cornelsen	1 Jervois Street, Port Augusta SA 5700	Kate.Cornelsen2@sa.gov.au	0884299666	SA Arid Lands Landscape Board representative	Yes

AGENCY REFERRALS

- **Commissioner of Highways**

No objection, with comments

- **Native Vegetation Council**

No objection, with comments

INTERNAL REFERRALS

- Janine Hugo – *Strategic Project Engineer*

Please see attachment 5

- Isireli Koyamaibole – *Environmental and Health Officer*

The current wastewater application is no longer valid, as it is over two years old. A new application must be submitted to SA Health, as the equivalent population (EP) exceeds 40.

PLANNING ASSESSMENT

The application has been assessed against the relevant provisions of the Planning & Design Code:

Land Use

The Rural Zone seeks:

PO 1.1 The productive value of rural land for a range of primary production activities and associated value adding, processing, warehousing and distribution is supported, protected and maintained.

The proposed development is designed to accommodate self-contained vehicles for up to 48 hours, with plans to plant 100 Quandong trees for future production. However, as the Quandong trees have not yet been planted and would require several years to establish as a viable production enterprise, the development cannot currently be considered as incorporating an associated primary production activity. Therefore, it does not meet the requirements of PO 1.1.

Siting and Design

The Rural Zone seeks:

PO 2.1 Development is provided with suitable vehicle access.

The proposed development is provided with bitumen Road for all vehicle access.

PO 2.2 Buildings are generally located on flat land to minimise cut and fill and the associated visual impacts.

The proposed development will primarily involve construction work, including the creation of a concrete base for the water tank (with a depth of 75-100 mm) and the installation of bitumen access roads around the site. Given the relatively flat nature of the site, the need for significant cut and fill will be minimal.

Shops, Tourism and Function Venues

PO 6.3 Tourist accommodation is associated with the primary use of the land for primary production or primary production related value adding industry to enhance and provide authentic visitor experiences.

The proposed development, categorized as a Caravan and Tourist Park, does not currently have any association with primary production or value-adding industries. While the proposal includes plans to plant 100 Quandong trees for jam and syrup production and to offer guided tours of the plantation, it is important to note that Quandong plants typically take 4 to 6 years to produce fruit. This timeline depends on factors such as soil quality, climate, growing conditions, and the presence of a suitable host plant, as Quandongs are semi-parasitic.

Additionally, the applicant has reported a failed attempt to germinate 100 Quandong seeds on the site. Consequently, the establishment of a functional Quandong plantation capable of contributing to primary production is unlikely to occur within the validity period (3 years) of the Development Approval. Furthermore, no details have been provided of the extent and processing of the quandong plantation.

Given these facts, until the Quandong plantation reaches maturity and contributes to production, the caravan park will not be associated with any operational primary production activity. Therefore, the proposal does not satisfy PO 6.3, which requires an ongoing primary production activity to establish a clear association with the development.

Tourism Development

PO 1.1 Tourism development complements and contributes to local, natural, cultural or historical context where:

- 1. it supports immersive natural experiences*
- 2. it showcases South Australia's landscapes and produce*
- 3. its events and functions are connected to local food, wine and nature.*

PO 1.2 Tourism development comprising multiple accommodation units (including any facilities and activities for use by guests and visitors) is clustered to minimise environmental and contextual impact.

PO 2.1 Potential conflicts between long-term residents and short-term tourists are minimised through suitable siting and design measures.

PO 2.2 Occupants are provided privacy and amenity through landscaping and fencing.

PO 2.3 Communal open space and centrally located recreation facilities are provided for guests and visitors.

PO 2.4 Perimeter landscaping is used to enhance the amenity of the locality.

PO 2.5 Amenity blocks (showers, toilets, laundry and kitchen facilities) are sufficient to serve the full occupancy of the development.

PO 2.6 Long-term occupation does not displace tourist accommodation, particularly in important tourist destinations such as coastal and riverine locations.

The proposed development will cater exclusively to tourists with self-sufficient caravans or RVs, as the facility does not include amenities such as toilet blocks, showers, or kitchens. It will provide only potable water points, designated dump stations for caravans and RVs, 20,000 litre water tanks with firefighting fittings.

The site is surrounded by existing natural vegetation, with plans to enhance the area by planting additional native trees and shrubs. These will provide shade, privacy, and effective screening from the adjacent highway.

The nearest residence is located approximately 1.5 kilometres from the proposed caravan and tourist park.

Transport, Access and Parking

PO 8.1 Internal Road and vehicle parking areas are surfaced to prevent dust becoming a nuisance to park residents and occupants.

PO 8.2 Traffic circulation and movement within the park is pedestrian friendly and promotes low speed vehicle movement.

Parks with 100 sites or less - a minimum of 1 space per 10 sites to be used for accommodation.

The internal road within the park will be constructed with a bitumen surface and designed to include 12 separate parking spaces, exceeding the required minimum of 3. To ensure pedestrian safety, the speed limit on the internal road will be restricted to 10 km/h.

Landscaping

PO 3.1 Soft landscaping and tree planting is incorporated to:

- 1. minimise heat absorption and reflection*
- 2. maximise shade and shelter*
- 3. maximise stormwater infiltration*
- 4. enhance the appearance of land and streetscapes*
- 5. contribute to biodiversity.*

PO 3.2 Soft landscaping and tree planting maximises the use of locally indigenous plant species, incorporates plant species best suited to current and future climate conditions and avoids pest plant and weed species.

The site will preserve its existing vegetation outside the dedicated development area and incorporate additional native tree species, including *Pittosporum angustifolium*, *Eremophila longifolia*, and *Dodonaea viscosa* ssp. These trees will be strategically planted throughout the dedicated development area, as well as at each caravan site, to provide shade and shelter. This approach will enhance the visual appeal of the land while contributing to biodiversity.

On-site Waste Treatment Systems

PO 6.1 Dedicated on-site effluent disposal areas do not include any areas to be used for, or could be reasonably foreseen to be used for, private open space, driveways or car parking.

The proposed wastewater system is designed to be positioned on the western side of the site, near Augusta Highway, ensuring it is set apart from the caravan sites and driveways.

Fences and Walls

PO 9.1 Fences, walls and retaining walls are of sufficient height to maintain privacy and security without unreasonably impacting the visual amenity and adjoining land's access to sunlight or the amenity of public places.

The existing boundary wire face is at most 1m high and all the caravan sites and driveways are setback 40m away, ensuring privacy and security.

Site Contamination

PO 1.1 Ensure land is suitable for use when land use changes to a more sensitive use.

The existing land use of the property is residential, with a proposal to convert a portion of it to a less sensitive land use, specifically for Tourist Accommodation/Caravan and Tourist Park purposes.

OVERLAY

Hazards (Bushfire - Regional) Overlay

PO 5.3 Development does not rely on fire tracks as means of evacuation or access for fire-fighting purposes unless there are no safe alternatives available.

The proposed development includes a 40-meter asset protection zone, with a railway line serving as a natural fire barrier along the eastern side of the site. The park design further enhances fire safety by incorporating internal roads around its perimeter, providing additional protective barriers. Additionally, the park will feature 22,000-liter water tanks specifically dedicated to firefighting purposes.

Key Outback and Rural Routes Overlay

PO 1.1 Access is designed to allow safe entry and exit to and from a site to meet the needs of development and minimise traffic flow interference associated with access movements along adjacent State maintained roads.

PO 2.1 Sufficient accessible on-site queuing adjacent to access points is provided to meet the needs of development so that all vehicle queues can be contained fully within the boundaries of the development site to minimise interruption of the functional performance of the road and maintain safe vehicle movements.

PO 3.1 Existing access points designed to accommodate the type and volume of traffic likely to be generated by development.

PO 5.1 Access points are located and designed to accommodate sight lines that enable drivers and pedestrians to navigate potential conflict points with roads in a controlled and safe manner.

It is important to highlight that the existing access was originally approved for the residential dwelling, not for a caravan park. While the access way complies with the necessary requirements, a separate Section 221 application must be submitted to the Council (as advised by Manager of Technical Services) for approval due to the change in land use. The original approval was granted based on residential needs, which differ from the requirements of a commercial caravan park.

The access to and from the site is unobstructed, ensuring clear sightlines. Additionally, the application has been referred to the Department of Infrastructure and Transportation, which has raised no objections, subject to a few conditions and advisory notes as follows:

The proposed development must comply with several conditions by DIT, including ensuring access to and from the site is in accordance with the approved site plan and sealed from Horrocks Pass Road. All roadworks required for safe access must meet relevant standards, with associated costs borne by the applicant. The redundant crossover on Augusta Highway must be closed and reinstated to Council standards. Vehicles must enter and exit the site in a forward direction, and stormwater must be managed on-site without affecting the adjacent road network. Any infrastructure damaged during construction must be reinstated, and further development will require a comprehensive traffic and parking assessment.

Key Railway Crossings Overlay

PO 1.1 Site access does not interfere or impact on the safe operation of a railway crossing.

The railway crossing is approximately 102 meters from the access point, which is close to the recommended distance of 110 meters for a road with an 80 km/h speed limit.

Native Vegetation Overlay

PO 1.1 Development avoids, or where it cannot be practically avoided, minimises the clearance of native vegetation taking into account the siting of buildings, access points, bushfire protection measures and building maintenance.

PO 1.2 Native vegetation clearance in association with development avoids the following:

1. significant wildlife habitat and movement corridors
2. rare, vulnerable or endangered plants species
3. native vegetation that is significant because it is located in an area which has been extensively cleared
4. native vegetation that is growing in, or in association with, a wetland environment.
- 5.

PO 1.4 Development restores and enhances biodiversity and habitat values through revegetation using locally indigenous plant species.

As part of the proposal, the applicant plans to offset the cleared vegetation by planting a variety of native tree species, including *Pittosporum angustifolium*, *Eremophila longifolia*, and *Dodonaea viscosa* ssp, around the cleared area.

The application was referred to the Native Vegetation Council due to the applicant's proposal to remove existing native vegetation. While the council did not object to the proposal, they have included several conditions and advisory notes summarised as follows:

Clearance areas must be marked to prevent damage to surrounding native vegetation. Retained vegetation and trees near construction zones require protection in line with AS 4970-2009 standards. Materials like soil and cleared vegetation must not be stockpiled under trees or on native understorey outside approved areas. Similarly, construction vehicles and equipment must be kept away from native vegetation beyond designated zones. All activities must adhere to the Native Vegetation Act 1991 as outlined in Decision Notification 2024/2018/660.

Water Resources Overlay

The proposed development is situated approximately 25 meters from the watercourse. However, portions of the caravan site may be susceptible to inundation during a flood, as it lies within the High-Water Mark.

Advice from Council's development Engineer suggest that as the RV Park will not include any habitable buildings or structures and will consist only of vacant spaces for caravans and RVs, hence vehicles can readily relocate and vacate the area in the event of flooding. Therefore, the proposal is considered acceptable within the High-Water Mark.

CONCLUSION

The proposed development entails a caravan and tourist park with 28 sites, located within the Rural Zone and is a performance assessed category of development which required public consultation. Two representations were received and both representors have expressed a wish to address the panel.

The proposal has dual frontage to Augusta Highway and Horrocks Pass Road and was referred to the Commissioner of highways and the Native Vegetation Council for comment. Both DIT and Native Vegetation Council supported the proposal subject to conditions.

However, this type of development is deemed unsuitable for the site for the following reasons:

The proposed development does not align with the requirements for associated primary production as outlined in DO 1 and PO 6.3 of the Planning and Design Code which states:

DO 1A zone supporting the economic prosperity of South Australia primarily through the production, processing; storage and distribution of primary produce, forestry and the generation of energy from renewable sources

PO 6.3 Tourist accommodation is associated with the primary use of the land for primary production or primary production related value adding industry to enhance and provide authentic visitor experiences.

While the applicant has indicated plans to plant 100 Quandong trees after receiving consent, this is not currently established. The proposed Quandong plantation is intended to support activities such as guided tours along bush tracks, using the fruit for jam and syrup production, and repurposing the seeds for jewellery-making. However, the applicant has acknowledged previous unsuccessful attempts to establish Quandong plantations on the site, raising concerns about the viability of this proposal.

The proposed development is therefore considered seriously at variance with the relevant Desired Outcomes and Performance Outcomes of the Planning and Design Code, pursuant to Section 107(2)(c) of the Planning, Development and Infrastructure Act 2016.

RECOMMENDATION

It is recommended that the Upper Spencer Gulf Regional Assessment Panel resolve that:

1. The proposed development is considered seriously at variance with the relevant Desired Outcomes and Performance Outcomes of the Planning and Design Code pursuant to section 107(2)(c) of the *Planning, Development and Infrastructure Act 2016*.
2. Development Application Number 24023329, by Nathan Mahoney be refused Planning Consent for the following reasons:

The proposed development of a Caravan/Recreational Vehicle Park is based on a tenuous connection to a yet to be established quandong farm and future tourist park and therefore would be seriously at variance with Performance Outcome (PO) 1.1 and 6.3 of the Planning and Design Code provisions for the Rural Zone.

PO 1.1 The productive value of rural land for a range of primary production activities and associated value adding, processing, warehousing and distribution is supported, protected and maintained.

PO 6.3 Tourist accommodation is associated with the primary use of the land for primary production or primary production related value adding industry to enhance and provide authentic visitor experiences.

OFFICER MAKING RECOMMENDATION

Name: Sampurna Sikdar
Title: Planning Officer
Date: 17/01/2025

ENDORSED BY

Name: Henri Mueller
Title: Manager Growth and Regulatory Services
Date: 17/01/2025

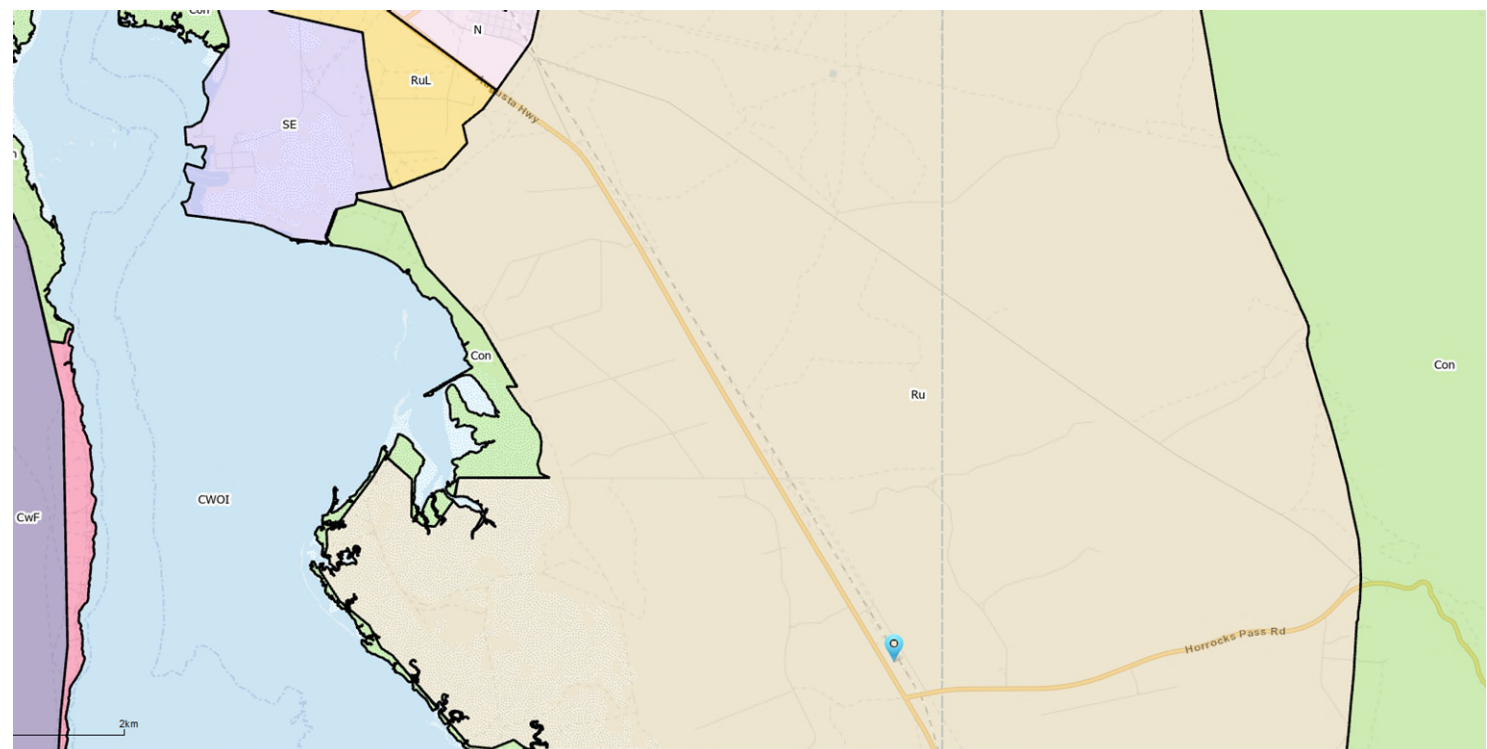
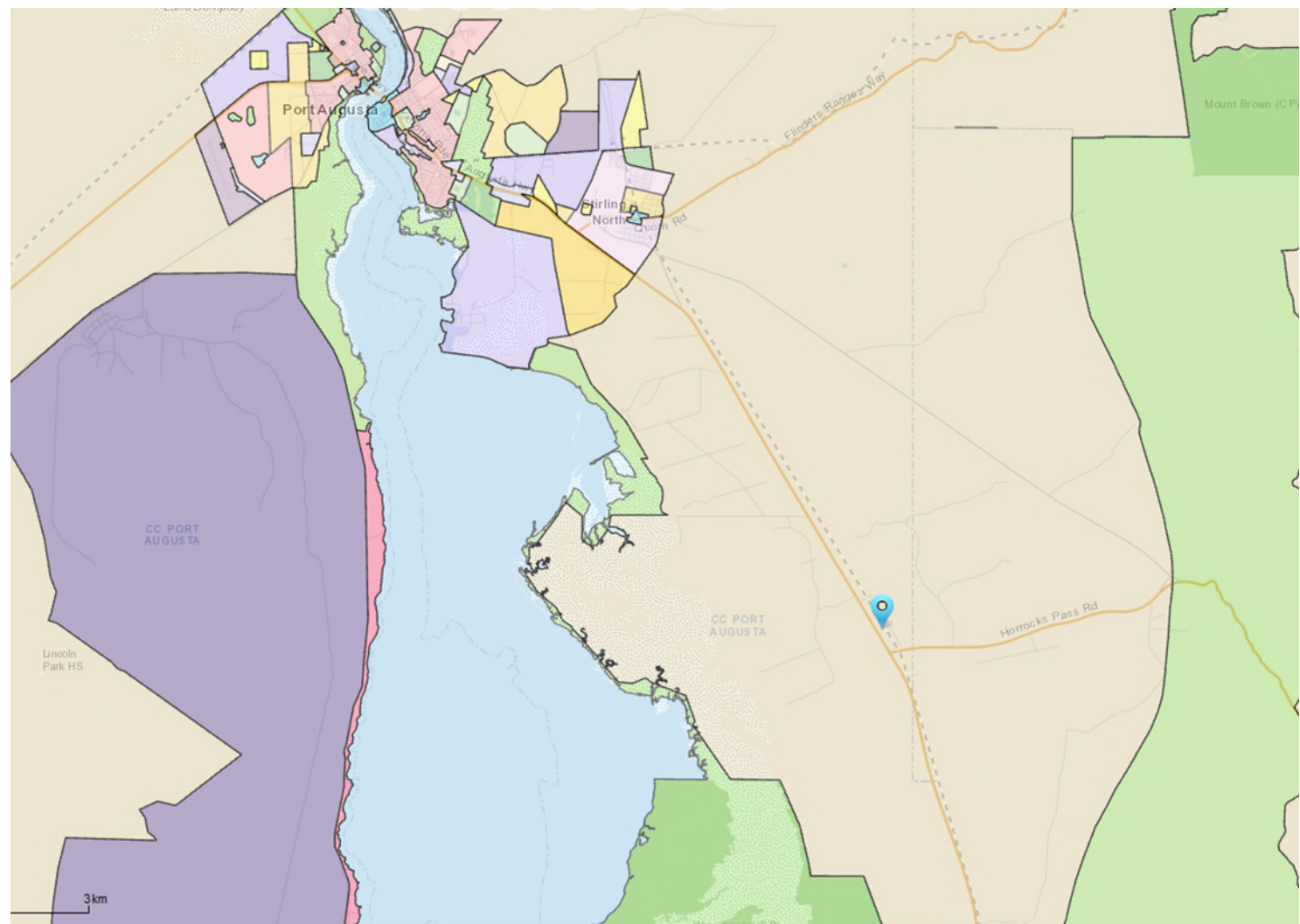
DECISION AUTHORITY

Relevant Authority: Assessment manager at Upper Spencer Gulf Regional Assessment Panel

ATTACHMENT 1: Subject Land Map



ATTACHMENT 2: Zoning Map



ATTACHMENT 3: Application Documents - Plans



LANDSCAPE LEGEND



1.02 NATIVE APRICOT
PITTOSPORUM
ANGUSTIFOLIUM
HEIGHT: 10m



1.01 LONG-LEAF EMUBUSH
EREMOPHILA LONGIFOLIA
HEIGHT: 8m



1.03 NARROW-LEAF HOP-BUSH
DADONAEA VISCOSA SSP.
ANGUSTISSIMA
HEIGHT: 4m

LEGEND

1 LANDSCAPING

1.01 LONG-LEAF EMUBUSH
EREMOPHILA LONGIFOLIA
HEIGHT: 8m

1.02 NATIVE APRICOT PITTOSPORUM
ANGUSTIFOLIUM HEIGHT: 10m

1.03 NARROW-LEAF HOP-BUSH
DADONAEA VISCOSA SSP. ANGUSTISSIMA
HEIGHT: 4m



PART SITE PLAN
1:500

LANDSCAPE LEGEND



1.02 NATIVE APRICOT
PITTOSPORUM
ANGUSTIFOLIUM
HEIGHT: 10m



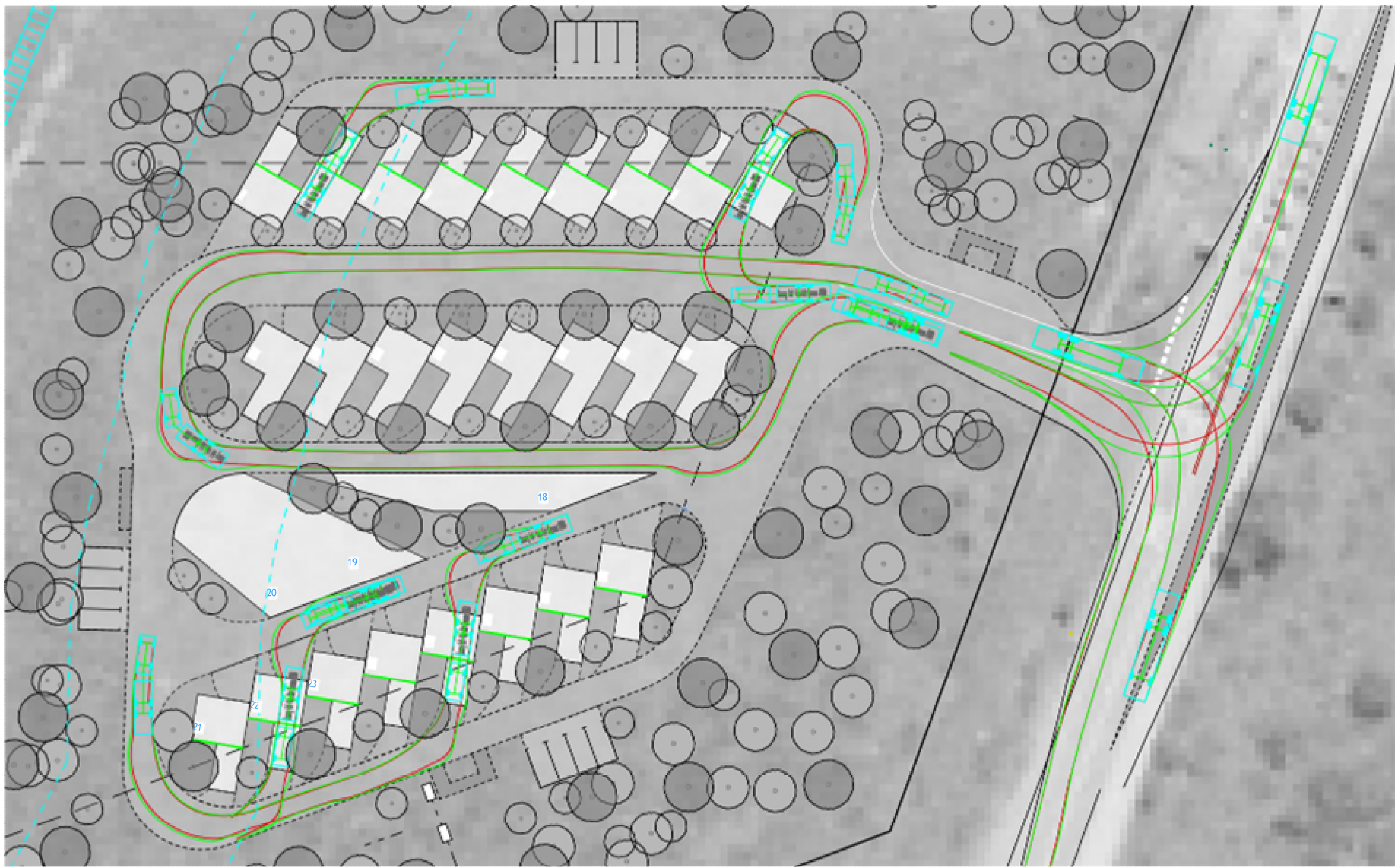
1.01 LONG-LEAF EMUBUSH
EREMOPHILA LONGIFOLIA
HEIGHT: 8m



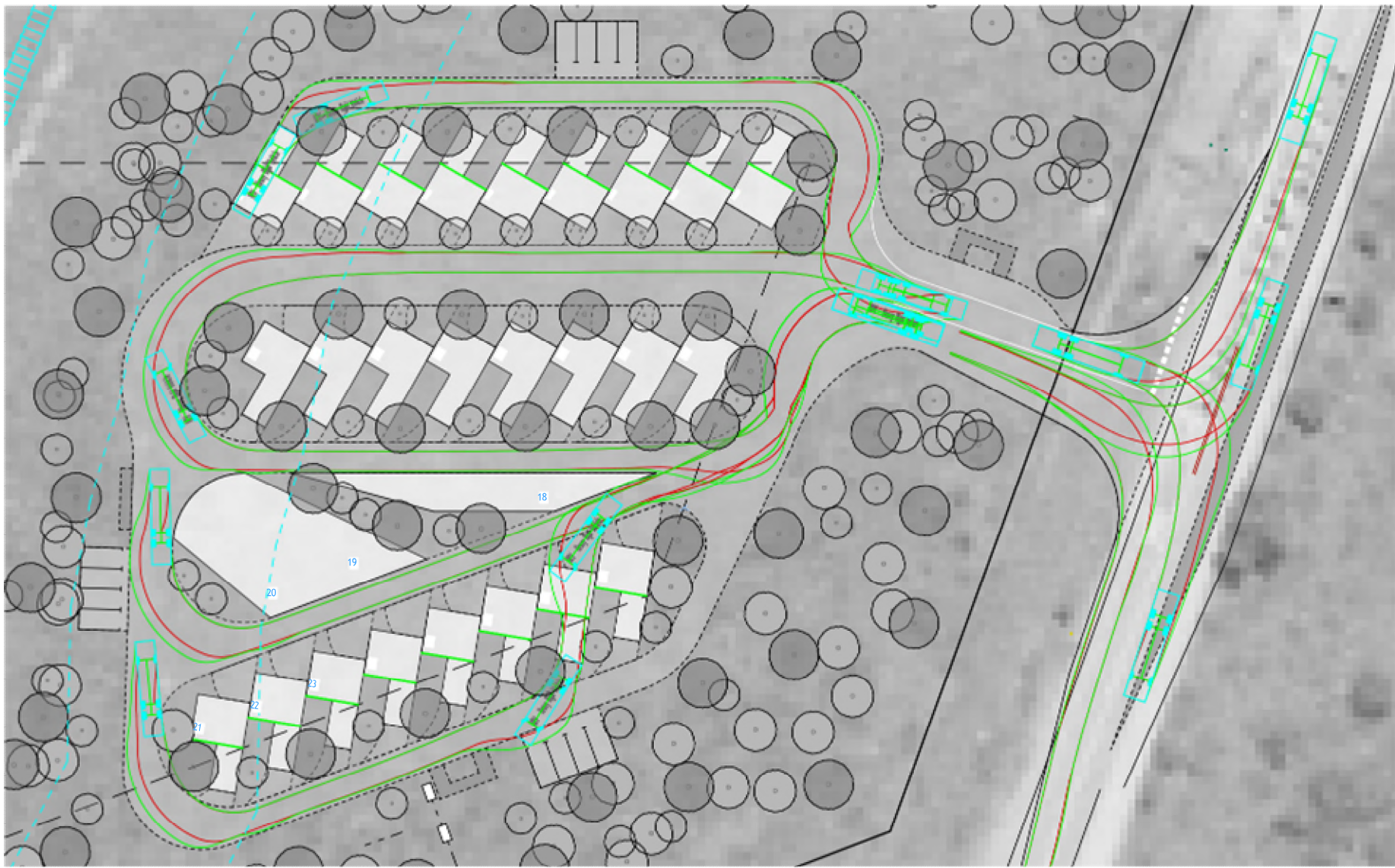
1.03 NARROW-LEAF HOP-BUSH
DADONAEA VISCOSA SSP.
ANGUSTISSIMA
HEIGHT: 4m

LEGEND

- 0 LEGEND
- E DUMP EZY
- F SOAKAGE TRENCHES
- REFER WASTEWATER DESIGN FOR
- DETAIL H WHEEL STOP
- GREEN LINE DENOTE CONCRETE SLEEPER IN GROUND INDICATING CAMP AREA / VEHICLE AREA
- I FHR
- FIRE HOSE REEL
- J POTABLE WATER POINT FIRE HOSE REEL
- K CAR PARKS
- 2,7 WIDE x5400 DEEP, ALL WEATHER GRAVEL
- L ALL WEATHER ACCESS ROAD
- 1 LANDSCAPING
- 1.01 LONG-LEAF EMUBUSH
EREMOPHILA LONGIFOLIA
HEIGHT: 8m
- 1.02 NATIVE APRICOT
PITTOSPORUM ANGUSTIFOLIUM
HEIGHT: 10m
- 1.03 NARROW-LEAF HOP-BUSH
DADONAEA VISCOSA SSP. ANGUSTISSIMA
HEIGHT: 4m



VEHICLE TURNING CAR + CARAVAN
1:500



SITE - VEHICLE TURNING 12 HRV
1:500

ATTACHMENT 4: Representations

Details of Representations

Application Summary

Application ID	24023329
Proposal	The proposal involves development of an RV park with 38 sites with a limited stay upto 48 hours. This will enable the tourists to visit the native Quandong trees, via a bush track.
Location	18618 AUGUSTA HWY WINNINOWIE SA 5700

Representations

Representor 1 - Kate Cornelsen

Name	Kate Cornelsen
Address	1 Jervois Street PORT AUGUSTA SA, 5700 Australia
Submission Date	13/11/2024 01:16 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
Reasons Please see attached letter of representation on behalf of the SA Arid Lands Landscape Board.	



SA Arid Lands Landscape Board

1 Jervois Street
Port Augusta SA 5700

PO Box 297
Port Augusta SA 5700

Tel 08 8429 9666

ABN 69 489 027 866

www.landscape.sa.gov.au/saal

Attn: Sampurna Sikdar
Port Augusta City Council
4 Mackay Street
Port Augusta SA 5700

Dear Port Augusta City Council,

The South Australian Arid Lands Landscape Board (SAALLB) has taken the opportunity to review and provide comments on the proposed development of an RV park in Winninowie, recently released for public consultation (Plan SA ID 24023329).

The proposed development area is within the SA Arid Lands region. Supporting sustainable development and land management that protects the region's biodiversity is a priority for the Board.

The proposed development area is adjacent to one of the largest known populations of the Waterhouse's Hairstreak butterfly (*Jalmenus lithochroa*). The butterfly is currently undergoing a conservation status assessment with the draft recommendation suggesting that the species should be listed as "Critically Endangered" under the EPBC Act 1999. Due to the risk of illegal collection, information on the exact location of this species is sensitive and has not been shared publicly. The species relies on extremely localised sites consisting of chenopod shrublands and/or grasslands with emergent *Acacia victoriae* and attendant ant species for its survival. The species exhibits high site fidelity with populations persisting at sites for decades and colonisation of surrounding habitats occurs infrequent. At the Winninowie location, the chenopod (saltbush) shrublands with emergent *Acacia victoriae* on the roadsides provides critical habitat for the species in the immediate area. Consequently, the proposed development area, and native vegetation clearances required, is likely to unfavourably impact this species.

The proposed development area represents a significant patch of intact remnant vegetation surrounded by large tracts of grazing land. Clearance of native vegetation for this development will impact the quality and extent of this remanent habitat. We suggest moving the development area to a location where there is likely to be fewer impacts to native species and welcome the opportunity to discuss potential alternate sites. For investigations into other roadside areas where similar vegetation associations occur, it is recommended that adequate searches are undertaken to ensure the area is well clear of any other Waterhouse Hairstreak populations.

For further information regarding this matter, please contact the SA Arid Lands Landscape Board office on SAALLandscapeBoard@sa.gov.au or (08) 8429 9666.

Yours sincerely

Jodie Gregg-Smith
General Manager, SA Arid Lands Landscape Board

Representations

Representor 2 - Mica Balela

Name	Mica Balela
Address	GPO Box 1047 ADELAIDE SA, 5001 Australia
Submission Date	13/11/2024 03:20 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons Please see attached letter	

13 November 2024

Attention: Stewart Payne
Independent Presiding Member
Upper Spencer Gulf Regional Assessment Panel

81-95 Waymouth St
Adelaide SA 5000
GPO Box 1047
Adelaide SA 5001 Australia

P: +61 (08) 7424 5760
E: dew.greenadelaide@sa.gov.au

www.greenadelaide.sa.gov.au

Dear Mr Payne

The Green Adelaide Landscape Board (Green Adelaide) appreciates the opportunity to review the proposed RV park in Winninowie, recently released as a notified development for public consultation (Application ID 24023329). While the proposed development is situated within the South Australian Arid Lands Landscape Board (SAALLB) region, Green Adelaide has been in consultation with SAALLB and is supportive of their concurrent submission.

Protecting and improving biodiversity is a key priority for Green Adelaide. Recent assessments of the status of butterfly species in South Australia identified Waterhouse's Hairstreak (*Jalmenus lithocroa*) as meeting criterion for *Environment Protection and Biodiversity Conservation Act 1999* listing as "Critically Endangered" and as a priority species for conservation. This species occurs only in South Australia and unfortunately has not been seen on the Adelaide Plains since 1962; it has only been recorded in three locations within the last ten years despite extensive searching.

The proposed development is adjacent to the largest known remaining population of Waterhouse's Hairstreak, the protection of which is critical for both the extant population and for future efforts to reintroduce this species into other areas, including back into the Green Adelaide Region. Green Adelaide has had a focus of rewilding the region, with Waterhouse's Hairstreak already a priority for reintroduction works. Without the protection of such sites, recovery efforts in other parts of the species former range (such as Green Adelaide) are not possible.

The proposed development will have direct impacts on the intact remnant vegetation at the proposed site. However, the incidental impacts of the proposed development will likely extend well beyond the RV park development footprint. We are concerned these will cause irreversible damage and greatly impact the survival of Waterhouse's Hairstreak.

Green Adelaide recommends that the habitat requirements of this important species are taken into consideration and together with the SAALLB, we are willing to be involved in further conversations regarding this matter.

For further information please contact Jason van Weenen, Team Leader Urban Biodiversity, Green Adelaide at Jason.vanweenen@sa.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Stuart Collard".

Stuart Collard
Manager, Landscape Operations

Attn: Sampurna Sikdar
Port Augusta City Council
4 Mackay Street
Port Augusta SA 5700

Dear Port Augusta City Council

Re Plan SA ID 2402332G

Please find attached a copy of the Native Vegetation Clearance Winninowie Park Data Report (Clearance under Section 28 of the Native Vegetation Act 1991 that was completed on 27 June 2022 and Prepared by Matt Launer from BlackOak Environmental Pty Ltd.

This Document (and we have highlighted the relevant parts) shows that we have endeavoured to complete in every way our Due Diligence in relation to this project - it also shows that we are prepared to do everything in our power to support the Environment.

The report on page 22 states that 22.99ha of the entire property contains Native Vegetation So, we believe that the clearing of the 1.59ha For the RV Park would have no significant effect on the surrounding environment and on page 23 of the report that is clearly recognized. See para below

“Provide a key finding on whether any or all of the area of impact could be considered as substantially intact. The area of impact is not considered as being substantially intact due to the altered density and diversity of flora species in comparison to original (pre-European) vegetation of that community. This is predominantly a result of historical grazing (over-utilised) and introduction of seven introduced flora species.”

In the report at 4.4: Principles of Clearance

Principle 1b significance as habitat for wildlife - No Threat.

Principle 1e it is significant as a remnant of vegetation in an area which has been extensively cleared.

This is At variance, however it is also necessary to consider the factor of the Quality of the remnant

“If the vegetation is in poor to very poor condition, is continuing to degrade and its long term (next 20 to 50 years) persistence is unlikely, then it may be reduced to ‘At variance’. The proposed development will result in the clearance of 1.59 ha of Maireana pyramidata Low Shrubland in poor to moderate condition. There is approximately 6,283 ha of native vegetation within a 5 km radius of the Project area. The Maireana pyramidata Low Shrubland on undulating plain is the most common vegetation association/landform within proximity of Port Augusta (Personal observation)”.

4.5 Address the Mitigation Hierarchy

Avoidance - as stated in the report it was decided early in the development of the plan to avoid any development within the minor ephemeral drainage line supporting vegetation.

Minimization: the report states As discussed above, the location of the proposed RV Park is considered most suitable in terms of vegetation structure and condition. The native vegetation is very homogenous across the entire property,

Rehabilitation or restoration has at least one significant and positive outcome

The clearance of 1.59 ha of Maireana pyramidata Low Shrubland is considered permanent and therefore rehabilitation or restoration is not practicable. The declared weed, Cenchrus ciliaris (Buffel Grass) will need to be managed within and closely surrounding the Project area. The management will likely need to be ongoing given the large infestations within the roadside vegetation of the Augusta Highway. *The removal of Cenchrus ciliaris from the Project area will enhance the existing vegetation.*

Offset - here you can see that the Project Owner was considering every possible way to ensure that the environment was cared for.

“any adverse impact on native vegetation that cannot be avoided or further minimized should be offset by the achievement of a significant environmental benefit that outweighs that impact. The owner is proposing to pay into the Native Vegetation Fund. The total payment required is :7,155.c8 which includes an SEB payment of :c,782.c4 and an administration fee of :373.05.”

Having seen that the the Native Vegetation Clearance Winninowie Park Data Report (Clearance under Section 28 of the Native Vegetation Act 1991 that was completed on 27 June 2022 and Prepared by Matt Launer from BlackOak Environmental Pty Ltd. clearly shows that everything has been done to mitigate any possible adverse effects to the environment I would like to address the two opposing positions.

First the Letter of the South Australian Arid Lands Landscape Board. Re the population of the Waterhouse’s Hairstreak butterfly (Jalmenus lithochroa). Jodie Gregg-Smith writes that the development is “**adjacent**” - it really is impossible to relate to such a term in relation to distance from anything and we suspect that such an ambiguous term has been deliberately used to confuse matters. We all want to work towards saving the environment - terms like that are “heart pullers” and of no assistance to anyone - especially developers.

Jodie Gregg-Smith goes on to write about a “Draft recommendation” and a “suggestion”. Drafts can and should be written many times over - the Suggestion and the recommendation may not even be in the “Final” Report. Development should not be curtailed because of a “draft” that may be years from actualization.

Then Ms Gregg-Smith writes “The species relies on extremely localised sites consisting of chenopod shrublands and/or grasslands with emergent Acacia victoriae and attendant ant species for its survival. This is again emotional writing and not at all specific - the word “Chenopod” is the family name for saltbush and not even a specific saltbush - That vegetation type is relatively common within the mid-north region of SA, particularly Port Augusta and Whyalla. Our report actually lists all of the saltbush growing on our property. Our report also lists the grasses on the property and Acacia victoriae is not there - and Ms Gregg-Smith in her letter states that it is an emergent roadside growth - so not endemic to the area. However - as the “roadside” grasses are what is required for the Waterhouse’s Hairstreak butterfly (Jalmenus lithochroa). It seems a far stretch to expect the RV Park to have any effect on their habitat. Another report done for the Windfarms Port Augusta Renewable Energy Park also has no reference to the Waterhouse Hairstreak Butterfly

http://epbcnotices.environment.gov.au/_entity/annotation/b84e0c42-fe96-e511-b7fa-005056ba00a8/a71d58ad-4cba-48b6-8dab-f3091fc31cd5?t=1732161122308

The Second opponents letter from Green Adelaide by Stuart Collard is really just a supporting letter restating the same information as the South Australian Arid Lands Landscape Board - with extra pieces of information. There are 3 known sites for the Butterfly, and they want to re-introduce it to the Adelaide region. Mr Collard also states that without protecting the “unknown/adjacent” site it is “not possible” to relocate the species to other sites. This seems to us to be an exaggeration and worse a negative comment on the skills of the scientists who do this sort of work.

We also note that at the time of the clearance proposal the Waterhouse’s Hairstreak butterfly (*Jalmenus lithochroa*) was not listed under the NPW Act or EPBC Act.

To enable us to move forward, as there is no data available on existing ‘nearby or adjacent to’ populations. Can the department please provide location data and vegetation communities of existing populations for risk assessment? We really need to know what ‘adjacent to;’ means.

We also need specific information for the location data, preferred habitat, any survey effort to date in the region and the preferred survey methodology including timing.

I am happy to work with everyone to get a satisfactory outcome to these concerns.

Sincerely

A handwritten signature in black ink, appearing to read 'Nathan Mahoney', with a stylized flourish extending to the right.

Nathan Mahoney

ATTACHMENT 5: Internal Referral Advice



INFRASTRUCTURE File Note - Internal Referrals from Planning

File No:	SR25/92	Date:	16/1/2025
Application ID:	ID 24023329		
Assessment Status:	Planning Consent		
Planning Officer	Sampurna Sikdar		
Nature of Development	The proposal involves development of an RV park with 28 sites with a limited stay upto 48 hours. This will enable the tourists to visit the native Quandong trees, via a bush track.		
Elements	Other - Commercial/Industrial		
Referral Type	Traffic and Stormwater		
Development Location:	18618 AUGUSTA HWY WINNINOWIE SA 5700		
Infrastructure Forms and Guides	Please refer to relevant Infrastructure Forms and Guides in links at end of document below.		

RESPONSE NOTES

Janine Hugo – Strategic Project

Engineer Civil:



Draft SMP 1% Annual Exceedance Probability (AEP)

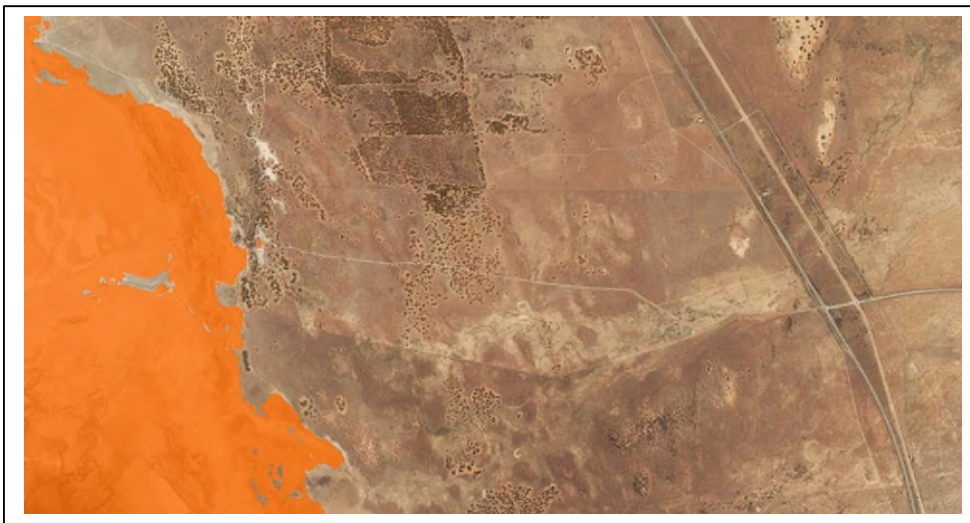
Above site map shows watercourse adjacent park, which will impact access to adjacent parking sites during periods of flooding.

- Finished Floor Level FFL to be 300mm above for Habitable buildings and 150mm above for non-habitable: **NOT APPLICABLE – RV CAMPER SITE, WHICH ARE RAISED ABOVE GROUND LEVEL DUE TO WHEELBASE, NO HABITABLE BUILDINGS TO BE INSTALLED COMPLIANT**

RESPONSE NOTES

b. Coastal Flood Hazard due to: **NIL SHOWN ON BELOW MAPS**

- Storm Surge 1% AEP for 2020 and 2050 events



1% Annual Exceedance Probability (AEP) Storm Surge

2020

2050

2100

(MHWS) 1% AEP for 2020 and 2050 events

- Mean High Water Springs



Mean High Water Springs (MHWS)

2020

2050

2100

c. **Construction Environmental Management Plan CEMP required to ensure adequate controls are put in place for dust, noise and construction traffic control during the construction phase**

- All roadworks shall be in accordance with IPWEA Infrastructure Guidelines SA.
- Driveways must be clear of stobies/light poles by minimum of 1.0m
- All new driveways and inverts across verge require Section 221 approval

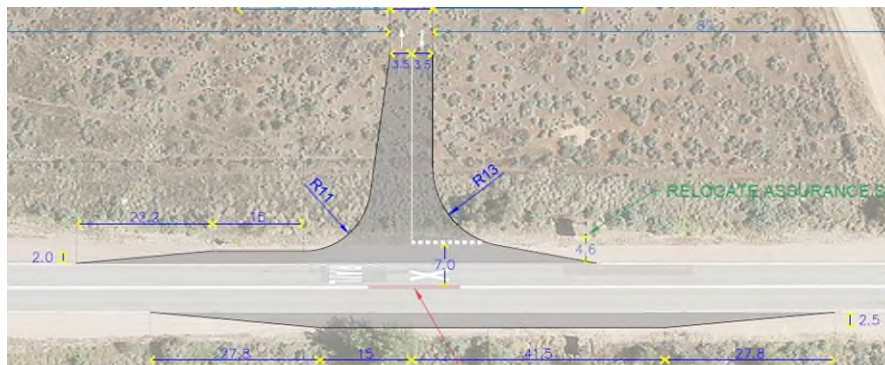
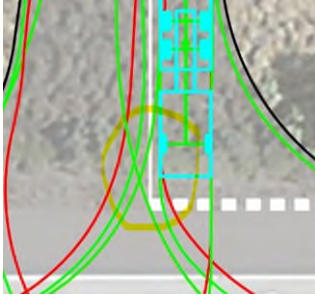
Stormwater:

- Stormwater overflow onto council property Post Development not greater than Pre-Development
- AEP requirements for low points where there is no overflow path and overflow may flood properties for minor and major systems;
Minor System: 1%AEP (underground)
Major System: 1% AEP (overland flow when minor system is exceeded)
- Any stormwater detention/retention basins designed to capture sites post development overflows must be located within the developed land and this is a private asset and its maintenance is the responsibility of the landowner.
- NO Stormwater overflow onto adjoining properties

RESPONSE NOTES

Traffic:

- AADT of 157 provided with 3.5m carriageway both sides (7m roadway) acceptable for access roadway
- Intersection turning movements have been assessed using 12.5m HRV and 19m AV vehicles, which fall within road envelope. Slight overlap of AV coming from property turning right onto Horricks Pass, where it cuts centreline and giveaway bar.
- Access roads (including as emergency access) require minimum construction with 150mm compacted quarry material (50mm base material and 100mm of sheeted surface), for two-way access a 7m crowned roadway would be required.
- Further information is required showing construction details of the entranceway. Minimum surface treatment of 40mm Asphaltic Concrete (Hotmix) surface required on area shaded area shown below to property boundary and 150mm compacted (96% MMDD) fine crushed rock



Street Lighting:

- All Street Lighting to comply with SA Power Networks Technical requirement
- Public Lighting to be included both for roads PR/V and carpark PC as per AS/NZS1158.
 - PR4 as minimum (factor in crime rates for area)
 - Collector Street Level 1 – V4
 - Collector Street Level 2 – V3
 - Lights to be StreetLED 3 Aeroscreen in type
- General Lighting to comply with AS/NZS1680.
- Emergency lighting to comply with AS2293.

Relevant PACC Forms/Guides:

Section 221 form:

https://www.portaugusta.sa.gov.au/data/assets/pdf_file/0019/223561/Port-Augusta-City-Council-Section-221-Form-Application-to-Undertake-Works-on-Council-Land.pdf

Driveway Guide: Concrete Driveway & Paving Fact Sheet

https://www.portaugusta.sa.gov.au/data/assets/pdf_file/0027/223983/AR21-13812-Port-Augusta-City-Council-Section-221-Driveway-Fact-Sheet.pdf

Stormwater Guide: Stormwater Fact Sheet

https://www.portaugusta.sa.gov.au/data/assets/pdf_file/0015/224025/AR21-13962-Port-Augusta-City-Council-Section-221-Stormwater-Fact-Sheet.pdf