

Appendix 2: Engagement Outcomes and Responses

Feedback received on Draft Scheme during statutory engagement (via written submission) and Scheme Coordinator response

Feedback received	Response
Draft Scheme detail and structure	
<p>Simplified format Further consideration should be given to remove the repetitiveness of items in the Scheme and simplify the readability.</p>	<p>Noted, refinement of scheme document to be considered in post consultation updated, noting that legislation provides certain requirements for inclusion.</p>
<p>Hierarchy of Reports There are a range of documents that either underpin or constitute the Basic Infrastructure Scheme. Having reviewed these documents, scope for greater clarity exists from a public perspective.</p>	<p>Clarification in final version of scheme for interventions as separate attachment</p>
Project Scope and Costings (general)	
<p>Costing standard The Scheme Outline requires cost estimates to be prepared to a Level 3–4 standard in accordance with DIT EST 600. However, the AECOM Class 5 estimates used in the IFP are only suitable for high-level option comparison and carry an accuracy range of $\pm 50\%$, making them unsuitable for funding decisions. The lack of design detail and high-level costs means that there is potential for scope creep over time, with these costs likely to be the benchmark. Additional work is needed to further test the required infrastructure and associated costings to ensure that the infrastructure upon which the funding is based is fit for purpose, not 'gold plated', cost effective and apportioned appropriately.</p>	<p>The PDI Act stipulates the requirement for the charge to be based on reasonable capital costs of the infrastructure to be provided. What is reasonable isn't defined, and due to the scale and long-term nature of the development, precise costing of all interventions is not currently feasible. With periodic reviews over the life of the scheme, costs (and the charge) can be revisited to provide greater detail as project delivery nears. This is particularly important if full cost recovery is sought. In response for the earlier phases, revised costs for road projects have been provided to level 2 DIT standard and based on more detailed plans. A clear table embedding these costs and the assumptions has been created and inserted into the Scheme. This new table will demonstrate a clearer and more defined calculation of the costs.</p>
<p>Costing methodology AECOM's methodology uses compounding percentage calculations, which significantly inflates costs. Metro has conducted a detailed review of the cost plan calculations. Based on this review and the methodologies outlined in the Mesh IFP and AECOM costing reports, the correct cost—using AECOM and RLB data—should be approximately \$89,000,000, equating to \$7,415 per lot. These adjustments do not reduce the substantial allowances included in AECOM's figures, they simply correct the calculation method.</p>	<p>The compounding approach was adopted to ensure that the final estimate captures all expenses, including the contractor's profit. This method is commonly used in the preparation of Class 5 Estimates, where limited detail is available to support a detailed cost build-up. These allowances can be further defined once a more detailed scope and delivery methodology has been developed. The estimating report further notes that the contingencies applied fall below the recommended ranges outlined in the DIT Estimating Manual for a Level 1 estimate. The Estimators have advised that if the non-compounding method was used and a higher contingency in line with the DIT manual were used the resultant would be cost neutral. The Estimators also advise that were the higher end of the contingency range detailed in the DIT Manual applied, total project costs would in fact increase. However, as outlined above, revised costings have been provided based on a more detailed set of designs. These more detailed costings will be used in the final draft of the scheme.</p>
<p>Identification of beneficiaries Whilst appreciative of the State Gov's \$94m commitment, this funding requires payback through the scheme. The</p>	<p>Not all of the \$94million is being paid back by growth area.</p>

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<p>infrastructure which this funding is to support should be seen as 'good infrastructure' which has broad community benefit. It is therefore imperative that apportioning of costs via the scheme accurately considers all beneficiaries, so as not to unfairly burden landowners/developers within the growth area.</p>	<p>Apportionment of costs to land outside of growth area has occurred through scheme.</p> <p>There is an existing Deed controlled by the TOG which will be used to recoup some of these funds.</p> <p>Further consideration /to apportionment has been considered in the revised scheme.</p>
<p>Apportionment The concept of the apportionment to the growth area in Table 3 is unclear. Should specify whether the apportionment column merely refers to the proportion of the overall cost of the relevant item of work.</p>	<p>Definition added into the draft scheme.</p> <p>Details of apportioned costs provided in 13.1</p>
<p>Local Government contribution Where funding is intended to come from local government sources, it is not apparent from the draft report how the scheme coordinator can require a council to pay for or contribute to such cost.</p>	<p>This is not specifically relevant to the scheme- scheme has to identify where funding is proposed from other sources, but does not have to detail exact arrangement. Detail provided in 13.1</p>
<p>Non-residential charge Page 7 of the Scheme states that non-residential land totals 15.01ha. However, the neighbourhood and local centres have not be included, so contributions from non-residential areas should be a total of 34.9ha.</p> <p>Is the Charge consistent for all dwelling types? For example, units, group, affordable/social housing, land lease communities, retirement villages etc.</p>	<p>The centres are included within residential component of land budget due to potential changes in area and land use mix. The per lot charge is derived from per hectare charge based on assumed density of 17.4 so areas are interchangeable based on same cost recovery. Land budget being updated separately.</p> <p>Covered in details of funding arrangement- per hectare rate for other residential uses.</p>
<p>Roads and Net Developable Area Are there existing public roads / road reserves that are going to be closed and added to the net developable area? If so, how have these been taken into account in the calculations? How will Council be compensated?</p>	<p>Transaction on closed roads would occur as a commercial negotiation in line with current practice and via the Roads (Opening and Closing) Act.</p>
<p>Charge on Kalbeeba land The charge for Kalbeeba is not required. The scheme is not required for infrastructure delivery. This approach conflicts with the principle of equity outlined in the Scheme, which should ensure fair and balanced contributions across all growth areas.</p>	<p>Access to water and sewer provided on understanding that works associated with Concordia would ultimately bring capacity into network to offset capacity provided as part of Phase 0.</p> <p>Accordingly the land is considered to be within the Designated Growth Area and contributes to the overall infrastructure demand and use.</p>
<p>Viability of development with all charges It is unclear what the costs will be on landowners/developers for all Charges combined (Basic, Social, Water/Wastewater, Public Transport) for residential dwellings and non-residential uses. Is it still viable to develop, particularly in Phase 2?</p>	<p>Charge applied over whole of growth area, referral would provide direction to out of sequence development where servicing and capacity can't be provided.</p>
<p>Funding of enabling infrastructure The funding plan states the following: <i>Several large projects are required early to facilitate development and growth of the area. This raises the question as to who funds this catalyst infrastructure, and which entity has the financial ability to forward fund infrastructure even if costs (fully or partially) can be recouped through the proposed Basic Infrastructure Scheme.</i></p> <p>The above is a highly contextual statement which is central to the purpose of a Scheme. The position of Meland is that catalyst infrastructure, particularly infrastructure which has</p>	<p>No legislative requirement that government funds trunk infrastructure.</p> <p>Statement in funding plan can be amended to provide more context "To provide the catalyst needed for the early delivery of housing and to support the private sector in accelerating land creation for residential development, the State Government intends to fund a range of strategic infrastructure projects. These include major intersection improvements and road upgrades along Barossa Valley Way and Cheek Avenue during phases 0 and 1 of the development program. This upfront investment will remove critical barriers to land activation, enabling developers to</p>

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broad benefit beyond the growth area, should ideally be funded by the State, and established as soon as practical.	proceed with confidence and ensuring housing supply can meet demand in a timely manner. The tables below highlight the different funding sources for the first phases.
<p>Phase 2 charge It is considered that the timeframe to provide the funding arrangement and charge beyond Phase 1 is excessive. In addition to providing a mechanism for Phase 2 landowners/developers to commence development should Phase 0 and 1 not undertake development within six months, the trigger point for preparing the funding plan and charge for Phase 2 should enable this to occur earlier than currently anticipated by the scheme.</p> <p>To provide greater certainty for later phases, Phase 2 costings should be prepared within 12 months of scheme adoption, rather than waiting for Phase 1 completion. The Scheme should mandate biennial reviews of cost assumptions to prevent escalation and ensure transparency.</p>	<p>Wording to be amended to note that while charge applies across all of growth area, development outside of phase 0 and 1 unlikely due to access to trunk infrastructure, notably roads, sewer and water which is to be delivered in phases. Works program relating to future phases to be refined and determined at least 24 months prior to completion of Phase 1.</p> <p>With periodic reviews over the life of the scheme, costs (and the charge) can be revisited to provide greater detail as project delivery nears.</p>
All references to monetary figures are assumed to be in 2024/2025 dollars. Does this mean the State Government funding may fall short, without allowance for escalation/inflation?	Detail relating to indexation and review of charging provided in scheme document.
<p>Gawler East Interventions</p>	
<p>Water Sewer and Roads The proposed charges for water, sewer and roads are significantly higher than any forecasts we have undertaken, including a tripling of water and sewer charges compared to the current greenfield rates. Our review of the costs and proposed inclusions (and exclusions) for roads within the Scheme has led to more questions than answers. We are disappointed at the rates proposed to be charged for the road outcomes proposed which are based on extraordinarily high costs, beyond any normal expectations.</p>	Further costings for transport interventions have now been provided. Noting that OOM costs are provided to enable road nuancing including bus lanes/stops, intersections, kerb returns, turn lanes, culvert crossings, road bends, hilly terrain etc and further detail from SIDRA analysis.
<p>Gawler East Road Interventions significant errors have been made in the costing of Gawler East interventions and the assumptions about CGA's contribution.</p> <p>The Funding Plan states that the Gawler East interventions are to be designed and delivered by Town of Gawler however Town of Gawler is not party to the Scheme, so a separate agreement would be required for their delivery. This agreement is yet to be defined and agreed.</p> <p>The State Government may elect to assist the Town of Gawler with the funding of these interventions, but that should be a separate funding arrangement and not be part of the Concordia Scheme.</p>	<p>DHUD has further investigated these interventions and provided further clarity around the proportions. Cheek Avenue still remains as a significant corridor for southern movements from the CGA. A breakdown of the comparison between what was intended to be built and funded through the existing Deed versus what needs to be built and funded through the scheme as a result in the additional traffic uplift.</p> <p>The ultimate delivery of the Cheek Avenue and Barossa Valley Way upgrade projects will be determined post scheme adoption needless to say the existing TOG Deed represents a statutory mechanism to recoup the cost and is considered a low-risk cost recovery mechanism.</p>
<p>Cheek Avenue Interventions Removal of the Gawler East Traffic Interventions from the Scheme as these cannot legally be included. Further our analysis shows that all but one of these interventions requires no financial contribution by the CGA.</p>	<p>The Gawler East traffic interventions are integral to the scheme as there is currently clear evidence that Cheek Avenue is the most suitable route to enable southern traffic movements. The IFP provides further detailed and clear justification for this.</p> <p>Charge relates to infrastructure required to service growth area and traffic reports indicate that external works are</p>

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	required. Projects included as apportioned cost on this basis. Updated justification in scheme to be provided
<p>Cheek Avenue apportionment</p> <p>The intersection treatments adopted in the original Gawler East intersection designs were insufficient for the expected traffic volumes at the time. The CGA does not increase the actual design requirements, which remain the same. However, the costs have increased significantly.</p>	<p>Further detail has been provided on the previous to post assumptions regarding the transport interventions for Cheek Avenue within a revised cost opinion provided by RLB.</p> <p>Updated costings and apportionment provided in scheme document.</p>
<p>Amendment to Interventions</p> <p>An amendment to the road interventions to be included in the Scheme as per Table 3. The charge for the road interventions currently proposed in the Scheme is considered to be unreasonable and poor value for money. However, willing to support this charge if it includes the interventions in submission.</p>	<p>DHUD has had a further, more detailed cost analysis undertaken as well as a review of the proposed interventions. Further analysis has enabled additional projects to be included in the scheme. Further details of this are provided within the revised Scheme documents.</p> <p>Updated detail relating to charge, costings and project list provided in updated scheme document</p>
<p>Timing of delivery</p> <p>The connectivity of Concordia southwards via Cheek Avenue and new road extension to Schomburgk Drive is an essential road infrastructure delivery requirement at the early stage of development.</p> <p>Connection of western Concordia via Harris Road to Cheek Avenue, including a new railway bridge, is listed in the scheme as a lower priority, but should be bought forward to assist with direct convenient linkage to Cheek Avenue / Schomburgk Drive.</p>	<p>Acknowledged that southern connections are important especially in the early phases of the development.</p> <p>It is noted in the Scheme that the Harris Road Connection to Cheek Avenue is a developer direct delivery project and is not considered essential to the overall flow of traffic as there are other future routes available. The costs identified as part of the investigations has highlighted that this connection will require a bridge across the existing Whitelaw Creek together with a railway bridge encompassing a 150m span. The estimated cost of these projects at this point outweighs the importance of this connection as the traffic from this area can use Concordia Road as an access to the south or alternatively the proposed Sturt Highway connection to the north. It is envisaged that this connection could be either a pedestrian bridge or vehicle bridge over the rail and will be subject to further investigation by the developer upon determination of the rail status.</p> <p>No change proposed to construct Harris road connection due to existing construction and feasibility constraints</p>
<p>Gawler Funding and Delivery</p> <p>As a package of works (Fig 1 & 2 in submission), the total build cost for the corridor is \$54M, excluding the Barossa Valley Way upgrades (\$40M). The corridor will need to be project co-ordinated and delivered before phase 1 housing development is progressed in any substantial manner.</p>	<p>Yes this is in line with the phasing identified in the Scheme.</p> <p>Acknowledged. This and the formal mechanism to facilitate the works is to be determined post adoption of the scheme. DHUD acknowledges that there is an agreement in principle for these works to occur and that it will assist to facilitate the outcomes.</p>
<p>State funding for IN-03</p> <p>Council foreshadows that it will need in the near future seek to revisit with DHUD and the Minister the funding of IN-03 as a State owned road asset ie Cheek Ave/Barossa Valley Way junction.</p>	<p>DIT has advised that there is no regulation that triggers IN-03 or any existing transport infrastructure to become a DIT project. DHUD aims to facilitate further discussions with DIT regarding the whole of the transport infrastructure projects.</p> <p>Works are not currently identified in DIT prioritisation or rolling schedules and as such are triggered by scheme as responsible party</p>
<p>Other roads and bridge projects</p>	
<p>Coordination of internal roads</p> <p>Where internal roadways are necessary for the proper development of the whole of the Growth Area then consideration would be given to whether such roadways</p>	<p>Further analysis on Scheme projects has been undertaken resulting in a greater number of internal transport interventions being captured under the scheme charge. Further clarification of this is relayed in the final drafts of the Scheme and IFP.</p>

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<p>form part of the scheme itself, including scheme funding and scheme delivery.</p>	<p>Additional roads included in scheme charge.</p>
<p>Sturt Hwy connection - Commitment to build the Scheme confirms the States' agreement to deliver the connection to the Sturt Highway pending final design and costing, and it is the Scheme Coordinators role to ensure delivery.</p> <p>There are roads included in, and partially funded by, the Scheme which are designed to connect into the Sturt Highway link; therefore, it is essential that this State road is delivered on time.</p> <p>The traffic cases assume connection to the Sturt Highway, but the timing of this infrastructure early in the scheme is critical to overall traffic management.</p>	<p>Noted</p>
<p>Link Road Land Acquisition (State Transport Infrastructure (pg. 30) What is the State Government's intent for "land acquisition" for the Link Road? Further information sought on timing and quantum.</p>	<p>The land budget has a calculation on the quantum of the link road area.</p>
<p>Link Road - to be dual lane and DIT asset Council's position that the Link Road from Sturt Highway to Outer Link Road and Outer Link Road should be delivered and maintained by DIT. Council is identified as the asset owner which is contrary to Council's endorsed position.</p> <p>The indicated outer "Link Road" has numerous questions in terms of its intended construction, spatial "land acquisition" and cost allocation. With consideration of its delivery viability, there is justification for the main boulevard road to be minimum dual lane in each direction at an early stage of development and designated as a road under State Government care and control.</p>	<p>Noted. DIT is the asset owner for the state projects ie link road and sturt highway connection as per tables in scheme. The central road intersecting the site from Barossa Valley way to the northern extent of the Growth Area will be a council owned road and its design will be in line with the transport investigation which envisages a nuanced solution with some sections being two lanes and some sections being 4 lanes and accommodating intersections and bus infrastructure. DIT has advised that there is no regulation that triggers this section of road to become a state-owned road.</p>
<p>Link Road - Contingency if not built What is the contingency if the outer link road is not built, noting the current scheme does not identify the main internal north-south road as an arterial road (RD-06 and RD-09 identified as connector roads) and thus could result in the road width being inadequate if it later needed to be widened.</p>	<p>The proposed internal boulevard collector road could be adjusted to a 4-lane road system to facilitate the increased flows which may be required should the outer link road not be built in line with program.</p> <p>Detail provided on consideration of link road in future with DIT- could be determined at that point</p>
<p>Intersection to be in Scheme The intersection of Harris Road/Springbett Road/Concordia Road will presumably need to be a signalised intersection or roundabout and suggest this should be in the scheme.</p>	<p>This project (IN-07) sits within the scheme as a developer delivered project to enable flexibility for the developer to incorporate the necessary features in line with its Neighbourhood Centre Design.</p>
<p>Sunnydale function Sunnydale is currently serving the local area connectivity with a local connector road level of service and is expected to provide road connection for an increased Concordia generated traffic especially in early stages. The plan highlights early traffic calming and LATM works in early staging. Sunnydale Avenue is not proposed to function as a Major Road Connection into the future. The existing access connection of Sunnydale Avenue to Barossa Valley Way is located within the Town of Gawler area and their ongoing comments and plans concerning this road into the future is consistent with the above.</p> <p>Sunnydale is identified as a collector road on the Concept Plan 161 – Land Use under the Code Amendment but Cheek is not.</p>	<p>Noted. This is currently in line with the proposed scheme.</p> <p>Through the Assessment Improvements Code Amendment, we're seeking to provide a mechanism where the Minister can update a Concept Plan. Therefore, once the Scheme is finalised, we may be able to make some updates to the Concept Plans to ensure consistency with the Scheme, subject to the Minister adopting the Assessment Improvements Code Amendment. Until it's adopted, the above clause is still draft and confidential, not for distribution.</p> <p>Concept plan can be updated post scheme completion</p>

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<p>The current 85th percentile speed on Sunnydale Avenue is 61 km/h despite a sign posted speed limit being 50 km/h. Therefore, the LATM treatments should be geared towards speed reductions through raised devices.</p>	<p>The Scheme currently aligns with this view and we also acknowledge The Town of Gawler aligns with this theme.</p>
<p>Who owns bridge assets? Bridge BR-02 has been identified as Gawler / Barossa maintained asset. Gawler are not equipped to manage substantial bridge assets. Further to this, as this will cross the rail interface, this asset may be better managed by DIT. DHUD staff have confirmed this matter will be further reviewed.</p>	<p>Amended the relevant table to reflect TBD. The asset owner will be determined in line with relevant policy and won't be influenced by the Scheme.</p>
<p>Kalbeeba Road Gawler has been keen to explore the future role of Kalbeeba Rd for north-south traffic movements into Concordia. Council put this into its most recent submission on the Code Amendment. At time of writing, there is no intervention shown for upgrading this road. Kalbeeba Road has not been modelled and is outside the scope of the Scheme at this point. DHUD is asked, however, to further review this issue in coming years once the timing of the freight route to Sturt Highway is confirmed as there remains logic in a direct route from Calton Rd to the Sturt via the perimeter of the Concordia growth area.</p>	<p>The Kalbeeba Link will be the subject of further investigation by DIT as part of its Link Road Connections.</p> <p>Road is not included in current scope. Could be considered further as needed</p>
<p>Role and need for RD-04 Road intervention RD-04 comprises the northern element of Cheek Ave from Barossa Valley Way/Cheek Ave junction to Harris Rd bridge. It is identified as an intervention in phase 2 (widened pavement and kerbing as per p31 of Funding Plan), 100% funded by CGA as a Gawler asset. Indicative timing in the Funding Plan (p31) is 2040. Given the significant upgrades of Cheek Ave south of Barossa Valley Way and Barossa Valley Way itself to Concordia Road, the need for RD-04 is unclear, particularly given a vehicle bridge connection to Harris Road is no longer being considered. It may remain an optional link but is not a priority and probably should sit outside the Scheme. A footway link is the higher priority, being BR-02. DHUD indicate in recent advice to Council staff that the need for RD-04 can be determined at the design of IN-03 and further works. This position is supported.</p>	<p>It is noted in the Scheme that the Harris Road Connection to Cheek Avenue and RD-04 is a developer direct delivery project and is not considered essential to the overall flow of traffic as there are other future routes available. The costs identified as part of the investigations has highlighted that this connection will require a bridge across the existing Whitelaw Creek together with a railway bridge encompassing a 150m span. The estimated cost of these projects at this point outweighs the importance of this connection as the traffic from this area can use Concordia Road as an access to the south or alternatively the proposed Sturt Highway connection to the north. It is envisaged that this connection could be either a pedestrian bridge or vehicle bridge over the rail and will be subject to further investigation by the developer upon determination of the rail status.</p> <p>Disclaimer included to intervention list</p>
<p>Freight Bypass The Scheme contemplates the freight bypass as shown in Fig 1B as State delivered infrastructure. However, the premise that CGA entities have no financial contribution to the freight route is difficult to follow. It could be reasonably argued that the freight route supports the 15 ha employment precinct shown in the masterplan. Further to this, residential properties will benefit in the use of the bypass in both accessing the Sturt Highway and accessing Barossa Valley Way. It also assists in directing 'inappropriate' through movement of freight traffic out of the town centre core area of Concordia. DHUD have advised Council staff that this issue will be further reviewed to determine phase 2 and future interventions, which is supported.</p>	<p>Noted.</p> <p>Scope for further variations to consider contribution towards such infrastructure</p>
<p>Sunnydale / Concordia Road TIS Option 2 (page 18 of scheme)</p>	<p>This intervention is covered as IN-04 and RD05b. The Scheme has proposed a solution that would require upgrading should the rail extend beyond the first railway</p>

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<p>This option has been used for the charge, but appears to make it difficult for rail extension beyond the new Concordia train station back to the southern side of Barossa Valley Way for future extension. This is concerning for aspirations for any future rail extension.</p>	<p>station. The timing of the rail and the ultimate solution is the subject of DITS on going Rail Investigations.</p>
<p>Plan 1, 2, 3 Questions</p> <p>a) Should CU-02 be included in Phase 0?</p> <p>b) Is EM-D6 integral to RD-08 and, if so, should it be included in Phase 1?</p> <p>Seek further information on how the timing/scope of intersections has been defined (e.g. junction of RD-11 and RD-12). Does the first developer to construct RD-11 need to build the first 10-15m of RD-12 at the same time? This is particularly relevant if any intersections align with boundaries for difference landowners/developers.</p>	<p>The culverts are noted in the scheme as direct delivery projects. The location and extent of each will be subject to the developers subdivision designs and ultimate staging.</p> <p>Representations of culverts in scheme to be amended. Included in road delivery costs.</p> <p>As above.</p>
<p>Table 3 and 4 Questions</p> <p>a) Seek clarification of wording (e.g. RD-09 “<i>Construction Creation of a new 23.2m wide corridor and construction of a new connector road...</i>”</p> <p>b) Seek further detail and clarification on scope/extents of infrastructure (e.g. RD-09 to be constructed from Harris Road to ST-05.)</p> <p>c) Suggest including and adding a separate label for the short section of road between the junction of RD-10 and RD-07a and BR-02.</p> <p>d) RD-13 delivery is noted as by ‘developers. To which developer does this refer, as none own this land / existing road reserve?</p> <p>e) Delivery responsibility is not stated for IN-04.</p> <p>f) Seek clarity for BR-02. Is a pedestrian bridge required even if a road bridge is not being provided?</p> <p>g) Some infrastructure appears to be on public land / existing road reserve (e.g. CU-03 & CU-04) and Delivery Responsibility has been assigned to “Developers”. Which developer?</p> <p>h) CU-08 to CU-12 do not appear on any plans and need to be captured.</p> <p>SP-01 is shown on the plans but not mentioned anywhere in the document regarding Charge, Delivery responsibility etc.</p>	<p>Wording around corridor widths in the scheme has been removed as the information has changed. Wider road widths are now envisaged to allow for possible 4 lane roads and better nuancing with bus infrastructure.</p> <p>RD-09 is currently a direct delivery project and its scope will be determined upon the further analysis by the developers on required internal traffic solutions.</p> <p>Noted that the short section of road is part of BR-02.</p> <p>Table 16 of the IFP notes that the delivery trigger is: “Prior to creation of allotments on the northern side of Barossa Valley Way” This has been noted and amended.</p> <p>If a pedestrian connection is required as part of the subdivision design, then a pedestrian bridge will be required.</p> <p>These are stormwater culverts to be delivered by developers as part of their subdivision works and will be handed over to council as per the current process.</p> <p>These were projects associated with the link road and have since been removed from scope to be dealt with at a later date.</p> <p>SP-01 is not a project that sits within the scheme. It will be part of the landscape design proposals presented by the respective developers as part of their wider open space strategy.</p>
<p>Suggested outcomes for other Road interventions (per Project ID)</p> <p>We believe the Scheme should be revised to better reflect: Inclusion of interventions in the Scheme that are critical to the functioning of the areas traffic network.</p> <p>Inclusion of interventions which will prevent fragmented implementation of key routes through the area which could arise due to multiple land ownership.</p> <p>More realistic costings based on current project delivery rates. We acknowledge that these costings will need to be</p>	<p>DHUD has had a further, more detailed cost analysis undertaken as well as a review of the proposed interventions. Further analysis has enabled additional projects to be included in the scheme. Further details of this are provided within the revised Scheme documents.</p> <p>Based on updated costs, charge and scope of projects included within charge have been amended.</p>

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<p>revised over the coming weeks and may result and amendments to our proposed strategy.</p>	
<p>Combined Proposal for projects to be cash flowed by State gov Interventions which we believe can be cash flowed by the State’s contribution of \$94 million. This results in a significant increase in the ability to deliver critical early road infrastructure.</p>	<p>DHUD has had a further, more detailed cost analysis undertaken as well as a review of the proposed interventions. Further analysis has enabled additional projects to be included in the scheme. Further details of this are provided within the revised Scheme documents.</p> <p>There is no change to the Governments funding of \$94million for the Cheek Avenue and Barossa Valley Way interventions as noted in the draft scheme. The southern access route has been deemed as the most suitable route for access to the south of the CGA.</p>
<p>Water</p>	
<p>Wider network modelled - Concordia apportionment SA Water assessment and strategy prepared for the CGA and the wider growth areas appears to have a depth of technical assessment completed. In reviewing the infrastructure proposed its difficult to comment given the wider network that has been modelled and serviced.</p>	<p>The SA Water Capacity and Infrastructure Availability Response APPENDIX G outlines SA Waters position on its assumptions for the Scheme.</p> <p>Given that these costs are apportioned to the CGA, with majority of costs sitting outside of CGA, no changes proposed to the documentation</p>
<p>Scheme charge vs current augmentation charge Similar to the wastewater, a water charge of \$15,000/ lot appears applicable from formalisation of the Scheme, noting the SA Water current augmentation charge is only \$5,120/ lot FY25/26. SA Water states that the enabling works (trunk infrastructure) to service Concordia will also benefit other surrounding areas. In this case there is a disparity between areas which are currently paying \$5,120k per lot (eg. Gawler East) and the CGA at \$15,000 per lot despite them benefitting from the same enabling works.</p>	<p>The SA Water Capacity and Infrastructure Availability Response APPENDIX G outlines SA Waters position on the costing assumptions for the Scheme.</p> <p>The charge is based on detailed analysis of the CGA and is a charge set based on servicing of the growth area. This is separate to the current augmentation charge covered by the section 6. It is noted that as Concordia is not covered in the section 6, to develop outside of the scheme the landowners would need to pay all trunk costs and augmentation charge.</p>
<p>Water Scope SA Water haven’t provided guidance on the ultimate scope of infrastructure required nor that a “worst-case” scenario for trunk infrastructure could be estimated to ensure provision can be made.</p>	<p>The SA Water Capacity and Infrastructure Availability Response APPENDIX G outlines SA Waters position on its assumptions for the Scheme.</p> <p>This detail has been conveyed by SA Water separately that planning for whole of CGA has occurred. Charge applicable to whole of growth area and subject to review as needed</p>
<p>Wastewater</p>	
<p>Unreferenced source SA Water have prepared a technical note capturing the servicing assessment completed and outlined a delivery strategy, in an unreferenced document received October 2025. The document appears to have formed the basis for the Scheme document.</p>	<p>This document was attached to the IFP and titled “The SA Water Capacity and Infrastructure Availability Response” APPENDIX G. This document provides a summary of various tech notes and investigations prepared prior to issue of final, formal advice which is anticipated for public review.</p>
<p>No charge for tankered lots As the developer is responsible for the full cost of tankering, we do not support the application of the \$15,000 charge for the lots which will be tankered.</p>	<p>Charge relates to full provision of infrastructure to service the growth area, irrespective of interim tinkering arrangements. Charge associated with development of treatment facility and as parties will benefit from that, charge is applicable.</p>

Feedback received	Response
<p>Detail of Phase 1 solution</p> <p>There is limited information presented with the Phase 1 solution, a packaged WWTP 1ML/ day plant catering for 2,000 lots is noted for \$176.7M. This equates to \$88,356 per lot for infrastructure that will only last up to 5-10 years as noted by SA Water.</p> <p>The budget costs are very high compared to infrastructure currently being delivered in the state; a local Council is currently delivering an asset for \$15 – 20 million per ML and private operators are presenting more cost-effective solutions regularly.</p>	<p>Comments regarding costs are noted, however government has acknowledged this in setting a charge which does not provide for full cost recovery.</p> <p>Scheme documentation has been amended to acknowledge that which SA Water have been considered in initial considerations, scope for alternate providers exists and is encouraged where provides a contestable solution of appropriate value.</p>
<p>Other solutions to tankering</p> <p>The existing network investigation has identified limited and or no capacity in the existing system, resulting in all initial lots to be tankered to Bolivar WWTP.</p> <p>The developer is responsible for the tankering until December 2029, whereby the Phase 1 Interim WWTP comes online. It should be noted 500 allotments maybe up to 5 to 6 45kL semi tankers per day for a 4-year period.</p> <p>SA Water is supporting a tankering solution on the basis that 20 to 30% of inflows are required for effective operation of a new packaged WWTP. While correct there are short term solutions to bring forward the delivery to avoid tankering. The use of temporary lagoons or redirection wastewater from the adjacent established areas can be considered.</p>	<p>Negotiations relating to tankering are not covered within the ambit of the infrastructure scheme and are subject to separate agreements between developers and SAW. Noted that for new systems and pumping stations tankering is a standard requirement until sufficient capacity of flows is achieved.</p> <p>Servicing solution for Concordia to be refined through design with SA Water and opportunities to explore early funding/delivery options.</p>
<p>Third party solution</p> <p>As drafted, the scheme assumes SA Water will be the wastewater provider.</p> <p>The scheme should formally acknowledge and indeed anticipate the establishment of a private wastewater system to service the whole of the CGA as an alternative to SA Water.</p>	<p>Alternate wording has been provided in scheme to note the opportunity for alternate providers to be considered</p>
Stormwater	
<p>Stormwater management framework</p> <p>Land development and its stormwater management framework in SA is generally a collaborative effort between state and local government and developers. The framework focusses on risk mgmt, and the key objectives of:</p> <ul style="list-style-type: none"> • Flood management • Peak flow management • Stormwater quality management and improvement • Environmental risk management and protection, and • Economic and social wellbeing considerations. <p>This brings together key Government bodies and their associated regulations, which has not occurred to date in relation to the stormwater strategy for the CGA. Therefore, the inclusion of the infrastructure as currently outlined in the Scheme is not considered practical or effective from a technical perspective.</p>	<p>The findings of the SMWS confirmed that stormwater can be managed across the CGA. Given the consolidated landownership at the time of preparing the report whereby 90% of the CGA is controlled by three parties, the detail provided within the SWMS of separate detention requirements enabling stormwater infrastructure to align with land ownership. This provides opportunities for development to proceed with less reliance on construction of offsite, downstream infrastructure, allowing potential development of multiple fronts within the CGA. This also provides opportunities for development proponents to directly deliver their respective stormwater management infrastructure and have regard to the SWMS, council EPA and existing engineering standards.</p> <p>Tonkins SWMS is scoped and designed with regard to DEW Technical reports and standards, The Planning and Design Code, CPAA Design Manual, EPA Victoria Reviews, Gawler and surrounds Stormwater Management Plans and Water Sensitive SA Guidelines.</p>
<p>Reason for including stormwater unclear</p>	<p>The SMWS establishes the foundation for a stormwater management strategy, which can be further expanded into</p>

Feedback received	Response
<p>It is not clear why SW is included in the scheme and is, therefore inappropriate, and may create a barrier and compromise an integrated and well-planned urban development. There are current mechanisms in place that oversee the successful implementation from master planning to construction.</p>	<p>a more detailed and holistic plan for the site. The proposed SMWS provides a pathway to initiate investigations and stakeholder discussions, enabling refinement and improvement of the work undertaken to date.</p>
<p>Implementation of SW strategy Typically land development relies on specific sequencing of stormwater management elements to suit the progressive nature of its implementation. It is therefore a dynamic process and requires flexibility in its implementation and management of the site.</p> <p>Further assessment and optimisation of the strategy should be carried out to better inform the sequencing and implementation of key assets.</p>	<p>We have identified challenges in prescribing the precise location of basins with embankments and determining culvert sizes to manage stormwater flows. In many cases, these facilities were collocated with roadways crossing existing watercourses, enabling the delivery of infrastructure in a way that aligns with the scheme's principles of value for money and minimising adverse impacts on designated growth areas. Recognising that circumstances may change, the scheme will be worded to ensure outcomes continue to deliver best value for infrastructure investment while maintaining an appropriate level of flexibility.</p>
<p>SW strategy too prescriptive The stormwater works that are alluded to in the scheme report are ambiguous. They are unable to be implemented by the Scheme, they cannot be implemented as defined because a final design has not been prepared, and therefore the level of prescription in the Scheme is unwarranted.</p>	<p>We have identified challenges in prescribing the precise location of basins with embankments and determining culvert sizes to manage stormwater flows. In many cases, these facilities were collocated with roadways crossing existing watercourses, enabling the delivery of infrastructure in a way that aligns with the scheme's principles of value for money and minimising adverse impacts on designated growth areas. Recognising that circumstances may change, the scheme will be worded to ensure outcomes continue to deliver best value for infrastructure investment while maintaining an appropriate level of flexibility.</p>
<p>SW strategy not prescriptive enough Following a desktop review of the final Tonkin SMP (2025), the strategy is not considered definitive, nor is it prescriptive in the outline of its strategy. Whilst flood management has been largely addressed using detention dams and culverts, other key objectives that would otherwise provide a holistic and integrated stormwater management outcome has not been addressed. Strategies for dealing with stormwater treatment has not been adequately addressed.</p>	<p>Although the SMWS addresses aspects of stormwater such as water quality, environmental impacts, erosion, and social wellbeing, the guidance remains broad. This provides scope for a more comprehensive SMWS plan to be developed at a detailed stage, which will then be assessed by the relevant referral agencies once further information is available.</p>
<p>DEW and EPA engagement Lack of engagement with key stakeholders including the EPA and the DEW places a risk on the outcomes and the direction the strategy will adopt. In principle approval for the Strategy has not been sought at this stage and this places uncertainty on the Strategy.</p>	<p>The SMWS outlines the basis of a strategy to manage stormwater flows generated by the site to inform the preliminary infrastructure requirements to be included in a scheme. A holistic SMWS will need to be developed with relevant stakeholders to determine the stormwater infrastructure required to service the area.</p>
<p>Barossa Stormwater Management comments Whilst the Final Stormwater Management Strategy appears reasonable in terms of the required deliverable outcomes vs site constraints, there are several items of concern.</p> <ul style="list-style-type: none"> • The stormwater drainage detention system requires that the peak stormwater flow rate discharging from the whole development site post development does not exceed the peak flow rate from the pre-development site. It is noted that the preferred option to achieve this utilises detention 	<p>All works within the watercourse and management of stormwater discharge to the watercourse should be in accordance with the a full developed SWMS.</p> <p>Further to this the introduction of tanks only has a 5% total runoff volume impact on peak flow reduction which could accommodated through detention systems. Rainwater tanks may be able to provide a way to manage the more frequent flows that lead to erosion.</p>

Feedback received	Response
<p>basins and swale infrastructure with additional requirements for rainwater tanks on private allotments. There are significant gaps in the details to achieve the requirement, including notional size of the rainwater tank requirements and whether this varies with respect to the allotment size. The question also remains if non-residential uses also require rainwater tanks to mitigate runoff.</p> <p>Overall, this methodology abrogates significant spatial and infrastructure cost risks to individual allotment owners, and, as such, Council will need implement substantial compliance directive and enforcement.</p> <ul style="list-style-type: none"> • Additionally, it is noted that the whole of development post-development flow volumes will be substantially higher than current pre-development flow volumes and Council will need to be vigilant to the need for appropriate erosion control measures as part of each development stage within existing and proposed watercourses and drainage flow paths. The added responsibility for Council is ongoing operational maintenance requirement by Council to inspect, monitor and address issues such as erosion and the like. <p>The risks are significant due to the steep terrain longitudinal grades, narrow V formation watercourse cross section and soil types.</p> <ul style="list-style-type: none"> • Whilst the stormwater strategy mentions mitigation of the post development peak flows, it makes no mention of addressing equally destructive post development frequent low flows -currently not experienced, which constantly saturates soils, making them easily eroded - similar to the erosion experienced downstream of the Springwood development in Kalbeeba. Further, it may be difficult to require developers to invest in these downstream erosion mitigation measures external to their site, with resulting ongoing high risk to Council. • Given the post-development flows are going to be significantly higher than current pre-development flows, it is prudent for allowance to be made for erosion control in the Infrastructure Scheme. 	<p>Clarity on erosion control measures to be noted in the Scheme and IFP. Increased erosion from development is primarily driven by higher overland flows, concentrated and faster velocities, changes to riparian zones, and alterations to existing watercourses. Managing erosion requires site-specific solutions, ranging from flow-control structures such as check dams or weirs to bank reinforcement using armouring, gabions, or vegetation. Source control can also be achieved during the land development stage, influenced by factors such as allotment layout, pipe gradients, discharge points, and overland flow paths.</p> <p>The SWMS represents a high-level, strategic framework that outlines possible approaches to stormwater management across the Growth Area. While it provides a foundational direction, it is not intended to be exhaustive or final. The SWMS reflects the Government’s commitment to enabling sustainable urban development while ensuring flexibility for site-specific solutions. Ongoing collaboration with relevant authorities, stakeholders, and the community will be essential as individual landowners and developers progress through the subdivision and development approval processes. This approach ensures that stormwater outcomes remain responsive, locally informed, and aligned with broader planning and environmental objectives.</p>
<p>Stormwater off-site works and catchment impacts</p> <p>Focus of engineering design for stormwater hydraulic design relates exclusively to in catchment detention within Concordia. This is set out in the Tonkin report at Appendix G of the documents.</p> <p>The proposed volume and quality management of stormwater is set out in Option 2 (and Option 2A, unclear which is preferred) and involves retention basins, basins, tanks and swales. The modelling of stormwater volume and different mitigation scenarios is set out in Table 1 (Tonkin, 2025, p.47). A few matters of note to consider:</p> <ul style="list-style-type: none"> • It is stated in the Tonkin report (p.47) that post flow runoff will significantly exceed onsite storage and harvesting. Council accepts the comment that excessively large on-site detention would be needed to mitigate runoff further and that this is likely impractical. But the impact is then to be experienced downstream. 	<p>The SWMS represents a high-level, strategic framework that outlines possible approaches to stormwater management across the Growth Area. While it provides a foundational direction, it is not intended to be exhaustive or final. The SWMS reflects the Government’s commitment to enabling sustainable urban development while ensuring flexibility for site-specific solutions. Ongoing collaboration with relevant authorities, stakeholders, and the community will be essential as individual landowners and developers progress through the subdivision and development approval processes. This approach ensures that stormwater outcomes remain responsive, locally informed, and aligned with broader planning and environmental objectives.</p> <p>Stormwater infrastructure shall meet the following requirements:</p>

Feedback received	Response
<ul style="list-style-type: none"> • To get a sense of scale of change modelled, under option 2 post flow rates in Whitelaw Creek and North Para River combined increase from 249 ML/year to over 697 ML /year. There is no off-site contribution to manage these additional flows into a known flood impacted catchment. • It follows that Town of Gawler and other downstream land management authorities will need to work closely with State Government and the Gawler River Flood Management Authority (GRFMA) to model these impacts and determine an optimal solution – flood mitigation, erosion control, upgrades to Murray Road ford etc. • Council has flagged this issue previously. The comments in the Scheme report (p.43) need revisiting that, in essence, the solutions proposed ‘...reduces the need for offsite infrastructure.’ Given the evidence from modelling completed, this statement is not supported. • On a more minor note, the Tonkin report assumes development is to begin in 2030 (p.23, p.56). This timing does not match the latest timing, which is now 2026. Also, the completion date is not 2070 (p.23) but 2057. Staging in table 7.1 (p.58) needs an update. It is unclear how these changes impact, if at all, any recommendations made on stormwater infrastructure delivery. • Finally, the scope to input water into the Gawler Water Reuse Scheme (Bunyip Scheme) will need further attention as further information becomes available at the land division stage as to practicality, cost and other factors. <p>Whilst it is acknowledged that the SWMS represents a high-level, strategic framework that outlines possible approaches to stormwater management across the Growth Area there is room for further clarity on how the above issues can be managed on-ground.</p>	<p>a. ensuring that downstream stormwater infrastructure has sufficient capacity to adequately capture and treat the runoff from the approved division.</p> <p>b. ensuring runoff is maintained at predevelopment levels.</p> <p>c. ensuring groundwater resources are not impacted.</p> <p>d. mitigating flood risk.</p> <p>The water quality of the stormwater runoff from the site should be in accordance with the Environmental Protection (Water Quality) Policy 2015. This should ensure that it achieves the following:</p> <p>a. Reduction mean annual pollutant loads when compared to the unmitigated stormwater runoff.</p> <p>b. be engineered to control erosion and limit sediment movement into natural watercourses</p> <p>All works within the watercourse and management of stormwater discharge to the watercourse should be in accordance with the following documents</p> <ul style="list-style-type: none"> • Microsoft Word - DOCS_AND_FILES-#16324132-v5-Technical_Services_-_EHTM_-_Part_6_-_Water_-_Attachment_6A_-_Protecting_Waterways_ <p>Stormwater Pollution Prevention - Code of Practice for the Building and Construction Industry</p> <ul style="list-style-type: none"> • 922379-GA-WAA-Control-Policy-23082022.pdf
Infrastructure Staging	
<p>Misalignment of Infrastructure Staging and Requirements</p> <p>Proposed timing of IN05 Collector Road as part of Phase 1 does not align with the anticipated staging of the development. Metro development will not reach this point within the proposed timeframe due to SA Water timing (it is more likely to be post 2035). Further the intersection between Concordia Road and IN05 should be included in the Scheme as part of Phase 1.</p>	<p>The intersection in between Concordia Road is not a scheme project it only highlights a possible connection should it be required as part of the developers further transport investigations resulting from the subdivision process.</p> <p>According to SA Waters advice in Appendix G of the IFP, water assets will be available to service stage 1A in December 2029 with sewer tnrking available at that time. Stage 1A can be accessed through the construction of IN-05 and RD08. According to our information stage 1A is controlled by Metro Homes.</p> <p>IN-05 and RD-08 can service Stage 1A according to our mapping however if some realignment of each is required the scheme can accommodate the change.</p> <p>Note above. IN-05 is a scheme project and RD-08 are direct delivery project. IN-05</p> <p>Scheme document update to provide clarity that delivery dates are indicative and subject to change</p>
<p>Staging methodology</p> <p>The staging solely anticipates the development of the Concordia Land Trust and Metro holdings as part of the first 2000 lots. This is clearly disadvantageous to our client. Further, it:</p>	<p>Staging plan was developed on the basis of advice and input from service agencies (including SA Water) on existing connection points and ease of service. Current commencement location based on access to existing and future connection points, road access and direction which</p>

Feedback received	Response
<ul style="list-style-type: none"> • does not support the objective of facilitating a competitive housing market; • does not provide alternate options should either of the two initial beneficiaries not proceed to develop, noting risks of such are high given the cost impositions imposed through the scheme; and • will prevent the urban development of soon to be zoned land for potentially 20 years. <p>Based on the above, the underlying assumptions informing the scheme are considered to be unreasonable and inequitable. More than two development fronts should have been planned for and accommodated, to optimise and fast track the delivery of housing, as a meaningful response to the entrenched housing crisis.</p>	<p>services are to be brought in from. Majority of services enter the growth area from the south, plan looked to leverage potential access points to growth area without prohibitive cost from multiple access points and existing access to south while requiring upgrade, provided a logical opportunity to move traffic to the south and into/past gawler without additional traffic to Murray St</p> <p>Scheme principles based around cost efficiency, value for money etc. provide justification for location of likely commencement for development.</p> <p>Noted that ultimate staging and delivery of land can be expanded as infrastructure becomes available and enabling works come into effect. Nothing in the scheme prohibits consideration to changes in staging or sequencing based on logical rollout and delivery of services and infrastructure.</p> <p>Additional detail provided in scheme document</p>
<p>Request to develop earlier</p> <p>Opportunity to develop early in Phase 2, if not earlier should be available to other landowners/developers not lodge land division applications within six months of scheme approval. Agency infrastructure planning and formal reviews of the scheme should have this position included as an underlying objective/assumption.</p>	<p>Noted. As detailed within the document, opportunities exist for the scheme coordinator to consider alternative or revised staging and access to infrastructure.</p>
<p>Delivery of Infrastructure</p>	
<p>Power to undertake works</p> <p>In the case of delivery by the State the scheme can rely on the terms of sections 187 and 191 of the Act. These would permit the Commissioner of Highways (for example) to undertake the work on behalf of the State or for the CEO to exercise the step in rights in s191.</p> <p>Those provisions do not apply to a local council or to another landowner. Therefore, to the extent that delivery responsibility for some of the works has been assigned to a council, it is unclear what the intention is to ensure delivery, as there is no way for the scheme coordinator to compel the council to undertake the work. The scheme ought to identify how the work would be undertaken to avoid the case where the council simply refused to do it. A form of binding agreement with the council may therefore be necessary.</p>	<p>Noted, amended wording provided in scheme that notes role of scheme coordinator in facilitating infrastructure delivery where required.</p>
<p>Cooperation of other landowners to deliver works</p> <p>Although the table does not identify any other private landowners external to the growth area whose cooperation would be needed for any of these works, two issues ought to be highlighted. Firstly, careful consideration should be given to whether or not agreement is necessary (for example McMillan Parade and Cheek Avenue). Secondly if works will be required on private land or require the cooperation of a private landowner external to the CGA, then some mechanism to compel that cooperation should be identified in the report.</p>	<p>Acquisition processes exist where required for intersections or other roads. Planned road to south (mcmillan) makes use of roads approved under existing masterplans, however noted that scheme coordinator will have a role in facilitating the delivery of infrastructure.</p> <p>Noted that same challenges may exist for delivery of SA Water infrastructure and would be worked through as part of design and tender processes.</p>
<p>Triggers for delivery</p> <p>The trigger for delivery column in Table 3 is somewhat ambiguous. In almost all cases it is a very succinct</p>	<p>Greater clarity to be provided in scheme document relating to triggers and applicable delivery.</p>

Feedback received	Response
<p>indication of timing of certain works but lacks the specificity needed to be brought into effect. For example, the reference to allotments as a trigger does not specify whether those are allotments that have been approved or deposited.</p> <p>The trigger does not consider potential further segregation of landholdings that may occur within the CGA over time as current landowners potentially divest portions of their sites to other development entities.</p> <p>Some triggers contemplate works or events occurring external to the site (e.g. project ID RD09). Consideration should be given to alternate triggers or the way in which external work might be delivered in conjunction with or so as to trigger the relevant work in the CGA.</p> <p>Triggers that simply identify a certain number of allotments make no reference to where those allotments might be delivered (or the extent to which that is important).</p>	
<p>Procurement</p> <p>The lack of clarity as to procurement and delivery highlights the potential for developer competition to adversely affect the orderly delivery of infrastructure which is of benefit to the greater CGA area.</p>	<p>Noted. Scheme document updated to highlight role of scheme coordinator in procuring and delivering required infrastructure.</p>
<p>Developer delivery</p> <p>For those items where 100% apportionment lies within the CGA and delivery responsibility is solely with the developers, some of those items do not identify with great particularity which developer might be responsible for delivery and how that delivery will be arranged.</p>	<p>Clarity to be provided in relation to developer delivered infrastructure, however will largely occur as land is developed which is consistent with standard practices.</p> <p>Captured in updates to delivery triggers referenced above</p>
<p>Allocation of water</p> <p>Regarding the allocation of water, will the Scheme Coordinator facilitate this on a first come first served basis? Will there be a mechanism by which water connection allocation can be reassigned in the event of a developer not progressing?</p> <p><i>5.9.1 & 5.9.2 Phase 0 & Phase 1 Projects (pg 54 - 55)</i></p> <ul style="list-style-type: none"> • It is noted that an equal allocation applies to the first 600 lots. Will an equal allocation also apply to the next 2000 lots? • Will the Scheme Coordinator consider a “use it or lose it” process for allocation of these lots to prevent any developer “squatting” on its allocation to ensure the ultimate goal of delivery of new housing. 	<p>All options will be considered in the operation of the scheme, scope for consideration of conditions, clearance requirements or other triggers to satisfy requirements. Noted that priority will be linked to delivery of housing and that allocation may occur similar to currently operates under housing roadmap.</p> <p>Conditions of clearance could also be used: i.e. requirements to demonstrate a SA Water DAFI at clearance request.</p>
<p>Infrastructure Delivery section in Scheme (page 63)</p> <p>Suggest breaking down “c) Detailed Design” into separate phases to ensure focus on early commencement of detailed design and help identify any scope issues or cost overruns earlier. Phases may include:</p> <ul style="list-style-type: none"> • 30% concept with cost estimate • 70-80% design with cost estimate • 100% design for construction with tender estimate 	<p>Works plan able to be refined based on inputs from process as development occurs.</p> <p>Update to scheme document reference progression of design of infrastructure for phase 0 and 1 post approval</p>
<p>State Social Deed</p>	
<p>Land allocation</p>	<p>Increased land allocation for primary schools was confirmed in a submission from the Dept for Education (DfE) and the Office for Early Childhood Development</p>

Feedback received	Response
<p>The proposal to set aside 5.1 hectares of land for a State Primary School is excessive and unjustified. Allocating this amount of land removes significant development potential and limits choice in the market, ultimately constraining housing supply and affordability. Our assessment indicates that 3.5 hectares is sufficient for a primary school, particularly when shared oval arrangements are considered. This approach is consistent with contemporary planning practices and ensures efficient land use without compromising educational outcomes.</p> <p>Metro maintains that land proposed to be acquired for education is excessive and unjustified and should be reduced to 3.5 hectares.</p>	<p>(OECD) during the Code Amendment consultation. The DfE advice was informed by their own planning practices and data, which includes ensuring sufficient space is available to expand school capacity from 450 students (3.2ha) to 600 students (5.1ha).</p> <p>OECD submission during Code Amendment consultation outlined the requirement (arising from the Royal Commission into early childhood care and education) for public primary schools to also incorporate preschools and long day care centres. This was factored into the amended space allocation for state primary school sites.</p> <p>No evidence has been tabled relating to the assessment that has been undertaken. In this instance, land size is based on indicative education requirements and has opportunities for refinement as development occurs</p>
<p>Private schools</p> <p>How is the reservation of land for state schools to be managed when private schools are also seeking land for provision of services? The AECOM Social Infrastructure Strategy identifies a level of education service provision in total, for both public and private schools, however, the Code plan identifies all of these sites as State schools.</p> <p>The issue for the Concordia community is the provision of a quality education outcome whether by public or private schools (most likely a combination of both). Reservation of specific land parcels for one entity over the longer term provides no guarantee of adequate service delivery.</p>	<p>With regard to scheme land budget reflects a charge on all land uses including private and public schools so charge recovery would be unchanged.</p> <p>Supply of education sites is likely to be informed by demand profiles and supply between different providers.</p>
<p>How is land to be acquired</p> <p>In section 15.2 there is reference to the valuation of land. But it is unclear if and how land will be acquired for infrastructure.</p>	<p>Detail relating to social infrastructure deed sits outside of scheme, can be communicated separately.</p>
<p>Fair compensation</p> <p>The land acquired for public purposes must be purchased at market rates, not based on the current zoning. Applying market rates is critical to maintaining fairness and equity for landowners and developers. Using zoned values significantly undervalues the land, effectively imposing an additional financial burden that is transferred to the home buyer. This practice sets a precedent and could deter investment in future growth areas.</p> <p>The land acquired for public purposes must be purchased at market rates, not based on the current zoning.</p>	<p>Detail relating to acquisition of sites does not form part of scheme and would be part of a separate deed, which is a separate form of agreement.</p> <p>Costings relating to education land is not detailed within the scheme document.</p>
<p>Integration with social infrastructure</p> <p>School land allocation must also be reviewed in conjunction with the broader Social Infrastructure land take. The cumulative impact of these allocations risks undermining the viability of the development. Overestimating land requirements for public facilities creates unnecessary pressure on the remaining developable land, inflating costs and reducing flexibility for future community needs.</p>	<p>Shared use of school grounds and facilities was always envisaged during the social infrastructure investigations, and is supported by Dept. for Education. This maximises the utility of the school sites and reduces the need for additional provision of formal recreation and community spaces.</p> <p>Likely future colocation of facilities is likely to reduce overall quantum of social infrastructure and school land required</p>
<p>Further information request</p> <p>Further insight into the state deed, which is still in negotiation phase with developers, and the impact on the</p>	<p>School site locations were identified during the masterplanning process, which included workshops and input from all stakeholders. Locations based on proximity</p>

Feedback received	Response
<p>Scheme is also welcomed. Regarding state community facilities, in the absence of indicative/conceptual layout of facilities, how were areas determined?</p>	<p>to internal collector road networks and future PT provision, access to centres and connectivity to potential adjoining services and compatible land uses</p> <p>Spatial requirements were informed by the Dept. for Education and Office for Early Childhood Development based on their requirements.</p> <p>As the state deed is still in drafting and negotiation phase, information within it cannot be shared until the process has been finalised.</p>
Planning Referral and Prelim Agreements	
<p>Scope of referral</p> <p>The scope of the referral is, in our view, too broad. It should be narrowed to focus on the imposition of a charge via conditions, and/or where the proposal may compromise the Infrastructure Scheme Works Program.</p>	<p>Scope of referral defined by Planning and Design Code and associated legislation. Policy reflects current scope of referral and no change proposed at this point</p>
<p>Impact on approvals</p> <p>This referral process introduces an unnecessary delay to development approvals. The charge on land (including timing of payment) are already addressed through the Scheme and can be reinforced via standard conditions prescribed in Practice Direction 12 –Conditions.</p>	<p>Suggestion appears to be counter to above point regarding scope of referral. Given infrastructure staging for CGA, nexus between scheme and Dev applications considered appropriate to provider oversight on out of sequence development, infrastructure capacity and to ensure nil impact to infrastructure projects provided for in the scheme.</p> <p>Noted that referrals are a relatively common aspect of greenfield land division.</p>
<p>Referral timeframe</p> <p>While the Overlay creates a nexus between the planning approvals process and the Infrastructure Scheme, if this referral process is to remain, the current timeframe of 30 business days should be reduced to 15 business days. This would better reflect the limited scenarios where development is inconsistent with the Scheme, noting such inconsistencies would already constitute a breach of obligations under the PDI Act and the Basic Infrastructure Scheme.</p>	<p>Unclear how an inconsistency in DA would constitute a breach in obligations under PDI Act but open to continue on specific clause.</p> <p>Referral timeframe to account for potential secondary consultation with infrastructure providers. DHUD able to review performance of timeframes regarding referral following a period of operation of an adopted scheme.</p>
<p>Monitoring and review</p> <p>We seek a commitment from Government that the referral process will be monitored and reported on, and that both its scope and timeframe will be re-evaluated within 12 months of its implementation.</p>	<p>As with all planning instruments, monitoring and review of the referral and scheme will occur. DHUD are not in a position to commit to timeframes of a formal review, noting that evaluation of performance will largely depend on the number of referrals which are processed to inform performance.</p>
<p>More information requested</p> <p>Further discussion is welcomed on the powers of the Scheme Coordinator and the implications on planning assessments.</p>	<p>DHUD are happy to continue discussions with Council regarding operation and practicalities of the referral.</p>
Works In Kind policy	
<p>Integration with scheme</p> <p>It is unclear why the Works-in-Kind Agreements Policy is presented as a separate document rather than being embedded within the Scheme itself. Greater integration would improve clarity and alignment with the Scheme's operational framework.</p>	<p>WIK policy will be included in scheme.</p>
<p>Incentive for WIK</p>	<p>The only way this suggested change works is if the charge is then not adjusted based on the revised cost as the credit</p>

Feedback received	Response
<p>The currently policy statement which provides for a credit of the actual cost of works rather than the budgeted costs is considered inappropriate as it provides a disincentive to undertake the works in the most cost-effective manner.</p>	<p>would exist and would need to potentially be paid back out of the scheme (as below).</p> <p>Discussions to date have detailed an appetite for charge to be reduced based on increased certainty relating to costing, with delivery being a natural extension to this certainty.</p> <p>Policy also provides for cost overrun protections to parties where cost is higher.</p> <p>Not recommended for change at this point, able to be considered following operation in practice for review</p>
<p>Reimbursement and offsets</p> <p>We seek guidance on how the policy will operate in scenarios where there are insufficient funds within the Scheme to reimburse the developer, or there is insufficient land available to offset the credit.</p>	<p>This is detailed in full within clause 12 of the policy.</p> <p>In short, repayment occurs based on capacity of fund. It is not the role of the scheme to reimburse out of sequence development ahead of funding other infrastructure projects which may be required for Growth area. Repayment would occur in stages to not impact fund (12.6) payment arrangements to be negotiated where cannot immediately provided (12.9)</p>
<p>Clause 12.1 – Interpretation needed</p> <p>The meaning and implications of Clause 12.1 are unclear. We request further explanation to illustrate its application.</p>	<p>Site is developed, obligations of charge are discharged.</p> <p>Wording clarified</p>
<p>Step 3 – Formal Agreement (Page 7)</p> <p>The reference to Council in this step appears inconsistent with the broader Scheme governance. We suggest this be amended to Scheme Coordinator, in line with other sections of the policy.</p>	<p>Noted, wording update</p>
<p>Compensation and repayment terms</p> <p>Upon acceptance of a WIK application or agreement, it would be preferable for the Scheme Coordinator to also confirm:</p> <ul style="list-style-type: none"> – The method of compensation in relation to the Charge on Land. – The repayment terms, as outlined under Clause 12.5. 	<p>Covered under part 8 of template agreement, noting that final determination of repayment terms may not be possible until delivery pending timing of construction, cost of intervention and potential fund at time for completion</p>
<p>Works Program policy</p>	
<p>Additional out-of-sequence works principle</p> <p>Recommend that an additional principle be included under Clause 5.3 to ensure broader impacts are considered:</p> <p><i>Out-of-sequence works should not result in financial impacts or delays to scheduled/planned infrastructure works for other parties. However, such works may be considered where they improve the efficiency of infrastructure delivery and reduce overall cost.</i></p>	<p>Comments noted, additional clause which takes reference from this comment has been included in the draft policy</p>
<p>Unsatisfactory mechanism to alter staging</p> <p>The scheme does not provide a satisfactory mechanism for developers/landowners to accelerate or change the staging.</p>	<p>Comments noted, additional clause which takes reference from this comment has been included in the draft policy</p>
<p>Appendix D – Works Program (scheme page 72-73)</p> <ul style="list-style-type: none"> • Suggest a higher level of detail (i.e. months or quarters) for Phase 0 and Phase 1 timeframes. • Should expand the program for Phase 0 and Phase 1 timeframe to show timeframes for Investigations, Design, Procurement and Construction. 	<p>As a public facing document, high level detail provided to avoid need to constantly update document based on changes in delivery and design timing. As consultants are engaged, greater level of detail would be available to stakeholder</p>

Feedback received	Response
<p>Investigations/designs</p> <p>It is strongly recommended that early investigations/design of all basic infrastructure to at least a 30% concept design phase (with P90 costings) is completed to identify issues and potential more efficient solutions much earlier. This is particularly relevant in undulating terrain where road design can have broader impacts on the surrounding terrain, extent of earthworks etc.</p> <p>This will also help with Works-In-Kind proposals and prevent any sacrificial works / overbuild.</p>	<p>Comments noted,</p> <p>Additional drafting included in scheme document to reflect the refinement of design associated with phase 0 and phase 1 projects</p>
<p>Reviews and Variations policy</p>	
<p>Approval of variations</p> <p>The policy should clearly state that all variations to the Scheme must be approved by the Minister. We support that the Policy includes specific criteria for when a change is considered “<i>significant</i>”. This enhances the transparency and enables consistency in decision-making.</p>	<p>This is a requirement of Act, clarification has been provided in variation document to specify approval issued by Minister</p>
<p>Minor variations</p> <p>We assume that administrative or minor variations to the Scheme are delegated from the Minister to the Scheme Coordinator. This section may need to be checked for alignment with the PDI Act.</p>	<p>Policy identifies that all variations are approved by Minister. No delegation regarding ultimate approval</p>
<p>Review principles</p> <p>Clause 4.4 outlines principles for reviewing the infrastructure charge. While these principles paraphrase section 166(2) of the Act, they are not entirely consistent.</p>	<p>166 (2)(d) identifies that a funding arrangement should recognise the ‘need to provide value for money’ so drafting is aligned with legislation.</p> <p>Clarification text included in policy</p>
<p>Ability to Influence/Vary Schemes</p> <p>Developers will be reliant on the Coordinator’s decisions, with limited mechanisms built into the scheme to challenge staging or scope determinations. This leaves developers/landowners with limited influence once the scheme is adopted.</p> <p>Developers/landowners may propose an amendment to the scheme, but only once per year and with the Minister’s approval. The Minister retains discretion to vary schemes at any time. In this context, developers face rigid amendment opportunities, while government has flexibility.</p>	<p>Wording amended pre consultation to allow for multiple amendments, no restriction on ‘once per year’ provisions relating to variations are provided under PDI Act. Potential for consideration as part of future regulatory works, however provisions of Act relating to variations are fixed at this point.</p>
<p>Multiple Amendments</p> <p>Provisions should allow multiple amendment requests where material circumstances change. Mechanisms to equalise costs and opportunities across all contributors must be embedded to prevent permanent disadvantage to any developer/landowner.</p>	<p>No limitation in drafting on number of amendment requests, multiple amendments able to be considered in parallel cost equalisation provided through ability for Works in kind to be recognised through updates to the charge</p>
<p>Governance and Legislation changes</p>	
<p>Introduction of Primary Schemes</p> <p>Confirmation of whether there is an intention to build primary infrastructure into the Scheme at a later date.</p>	<p>No current proposal for a primary infrastructure scheme at Concordia is proposed as there is an expectation of deeds being signed prior to the removal of the holding overlay</p>
<p>Governance transparency</p> <p>The Scheme Co-ordinator should be required to publish all staging decisions and reasons for resequencing refusals.</p>	<p>This is covered by the existing variations policy which notes all decisions will be published on the PlanSA Website.</p>
<p>Working group to progress scheme</p>	<p>Noted.</p>

Feedback received	Response
<p>We continue to progress the scheme through a formal Scheme Working Group that comprises representatives from core landowners, DIT and SA Water. The Working Group should be Chaired by the Scheme Coordinator. The Work Plan for the Group should include: – Negotiations to deliver a private sewer solution</p> <ul style="list-style-type: none"> – Design development of infrastructure interventions – Revised costings of these interventions. 	<p>Not related to formal scheme document, however intended that DHUD will convene a working group to progress various aspects</p>
<p>Appeals</p> <p>Developers/landowners should have the right to appeal staging or cost allocation disputes to an independent panel or the SPC.</p>	<p>Variations are determined by minister, any review against a decision could be raised to the minister. No role for SPC in scheme decision making, nor does SPC have technical oversight of such matters.</p> <p>Clarification of dispute resolution pathway- SC-CE- MO has been provided in variation pathway</p>
<p>Ongoing monitoring</p> <p>Formal review processes that enable inputs to the scheme as well as the structure around them are important. Lessons learnt throughout the process should be workshopped with a commitment to ensure improvements of the Scheme and the establishment of new schemes. Such may require further and ongoing review and update of the PDI Act and associated Regulations.</p>	<p>Noted.</p> <p>Future reform and update likely to be investigated.</p>
<p>Alignment with Code Amendment</p>	
<p>Impacts of amendments to Concept Plan on Infrastructure demand</p> <p>The Mesh Masterplan does not align with the approved Concept Plan. Changes made following public engagement on the Concept Plan relate to reduction in Employment Zone, introduction of a potential future health facility, change and increase in size and extent of the Neighbourhood Activity Centre and other matters as raised in the Concordia Code Amendment Instructions.</p>	<p>Land budget updated based on additional and changes to land uses.</p> <p>Expected Nil impact to land budget, as contributions from different land uses would be equal to comparable residential land uses or otherwise.</p> <p>Concept plan able to be updated based on final outputs.</p>
<p>Updates to Land Budget Plan needed</p> <p>The Mesh Master Plan and Land Budget Plan needs to be updated to reflect the final version of the Code Amendment Land Use Plan.</p> <ul style="list-style-type: none"> • Reduction in size of Employment Zone • Increase in size of public school land • Introduction of buffer areas 	<p>Land budget plan being updated in final version to reflect other documentation</p>
<p>Lifting of Overlay</p> <p>Will the Coordinated Development Overlay be partially lifted and thereby still be applied over areas to which Phase 2 of the Scheme relates, until such time as this is resolved?</p>	<p>The intention is to recommend lifting the entire 'Holding' Overlay at once deeds and scheme are resolved. Obtaining CSO advice of Phase 2 funding arrangement</p> <p><i>Part 1 of the Code: The Overlay may be spatially removed from land where the Minister is satisfied that:</i></p> <ul style="list-style-type: none"> a) a scheme under Part 13 of the Act has been adopted or an agreement is in place for the provision of all necessary essential infrastructure to support development of the growth area, and b) there are no other relevant restrictions to urban development proceeding

Feedback received	Response
	Detail relating to overlay not relevant to scheme documents and would not be referenced
<p>Clarity on Park n Ride, bus stations</p> <p>Clarification is sought on all future State funded infrastructure, including rail upgrade, railway station as per Concept Plan 161, park and ride, bus stations and health precincts. We seek confirmation of the timing of investment, as these are currently not mentioned in relation to the scheme, though impact the scheme considerably.</p>	<p>This infrastructure sits outside of scope for a basic infrastructure scheme and would be considered by DIT based on numerous factors, not least potential health precinct.</p> <p>Infrastructure included in future scheme phases detailed in scheme document</p>
<p>SAPN Easement</p> <p>The additional SAPN easement that is understood to be needed immediately west of the ElectraNet easement is not shown on any of the plans nor the Concept Plan under the Concordia Code Amendment. This will impact the land budget and available size of schools and open space areas.</p>	<p>The easement mentioned by SAPN is an easement that is still in planning and there is the possibility that it could be synergised with the existing ENET easement. As its not a known fixed or existing element we cannot assume it will exist. Potential for easement to be located in future road corridors.</p>
<p>Passenger rail upgrade</p> <p>Rail upgrades proposed to Concordia materially impacts Gawler both on Murray Street and Edith Street. The Funding Plan document (p.15) makes the point that an efficient public transport solution is needed in Concordia within either phase 0 or phase 1, that is within the first 2600 lots being delivered (pre 2036). But there is no information provided in the documentation as to how this will be delivered.</p>	<p>Rail provision sits outside of basic infrastructure scheme.</p> <p>Work being progressed separately by DIT to consider rail provision, will likely be impacted by future health precinct if proceeds</p>
<p>Increased land take</p> <p>The state school land take has increased by 11.5ha (9.5ha of which is located on CLT land) from the draft Code Amendment without consultation and the Scheme Coordinator has powers to direct outcomes for that land in accordance with Concept Plan 161.</p>	<p>Increased land allocation for secondary schools was confirmed in a submission from the Dept for Education (DfE) during the Code Amendment consultation. The DfE advice was informed by their own planning practices and data, which includes ensuring sufficient space is available to expand school capacity to 1800 students.</p> <p>Land preservation within CGA has previously been provided for and reflected In updated land budget</p>
<p>Procedural fairness</p> <p>Concern the current approach to provision of State social infrastructure effectively uses the planning system to facilitate the acquisition of land for state ownership, outside the control of the landowner, through a Code Amendment initiated by the CE. This appears inconsistent with the principles of procedural fairness that Government is obliged to uphold.</p>	<p>Social infrastructure outcomes are being progressed via a separate deed and are outside of scope for the basic infrastructure scheme.</p> <p>Comments are noted and negotiations relating to Social deed will likely address aspects</p>
<p>Disproportional impact on CLT holdings</p> <p>Of the total 633ha CLT land holding, approximately 208 ha is identified for non-residential/commercial land uses (open space, community, public schools, roads, services, drainage, and hospital (note DHUD has not included the hospital in its current land budget) which is 33% of total land area. CLT also accommodate the 15ha of Employment Zone land bringing the non-residential/commercial land to 35%.</p>	<p>In considering this, believe we should detail existing impacts to CLT land due to easements, river and other areas which are not developable.</p> <p>Scheme does not talk to social infrastructure or provision of land, covered by a separate process.</p> <p>Coordination of land for education purposes being considered separately</p>

Feedback received	Response
<p>Shared path network</p> <p>No allowance made for the shared path network within the Scheme. It is presumed this will be an obligation for each developer as part of their land division and infrastructure works.</p> <p>On the map at Figure 1B intervention SP-01 is shown. This appears to be a pedestrian trail within Light Council area, generally parallel to North Para River. It is not costed nor specified in detail in the plans provided. Is there further information on this intervention that DHUD can provide, specifically how it connects with the overall network?</p>	<p>Agreed and Noted. The SP is not part of the components that make up a Basic Infrastructure Scheme.</p> <p>The SP-01 is contained within land under the control of the Barossa Council. Further details on the path network and its connections to other areas will be undertaken throughout the subdivision process.</p>
<p>Absence of information on biolinks on North Para River/Whitelaw Creek and pedestrian and cycle trails</p> <p>These linkages are not addressed in detail in the basic infrastructure scheme. Whilst the basic scheme does identify key roads, within which it would be expected cycleway and pedestrian links would be delivered, the level of detail needed will require further consideration at the land division stage. DHUD staff advise that cycle paths are social infrastructure are picked up in the code policy.</p>	<p>The level of detail needed will require further consideration at the land division stage and the buffers are incorporated into the code policy to inform future planning applications.</p>
<p>Minor edits</p>	
<p>Scheme Tables 5 & 6, 'Delivery Responsibility' column should be added to be consistent with other sections.</p>	<p>Noted</p>
<p>Scheme Appendices in the main document including the detailed program of works provided in Appendix D is blurred and not readable.</p>	<p>Noted</p>
<p>Table 3 includes projects RD05b, RD06, RD13, and IN04 in Phase 1 but in Figure 13 they are shown as being included in Phase 0.</p>	<p>Noted</p>
<p>Table 20 Parcel Specific Land Budget – note that CLT does not own Parcel 19.</p>	<p>Noted</p>
<p>Page 21, para 4 of Funding Plan refers to Section 5.3.1 but there is no such section</p>	<p>Noted</p>
<p>Query whether the word “after” should be amended to “before” on page 5 that notes the Funding Agreement and Charge for development beyond Phase 1 “must occur no later than 24 months after the completion of Phase 1, or upon the creation of the 1800th allotment within the CGA – whichever comes first.”</p>	<p>Noted. Suggested wording change</p>
<p>Table 3 (pg. 31-40)</p> <ul style="list-style-type: none"> • Delivery Responsibility for IN-04 is undefined. • Is the “100% apportionment” to CGA for SW-03 and SS-02 consistent with Table 5 (pg. 44) which states “Contribution via Charge on Land, State”? 	<p>Noted, IN-04 is Developer responsibility</p> <p>Noted SA Water apportionment- Amendments made but further consideration needed.</p>
<p>Appendix H</p> <ul style="list-style-type: none"> • Legibility is an issue. • Difficult to read (too small) but would appear to be same information shown in Appendix D – Works Program of the Concordia Basis Infrastructure Scheme 	<p>Works Program legibility noted in document but when you open the separate Appendix its legible. Fix document to read tables and appendices as A3 landscape.</p>
<p>Figure 1 (p.7) of the document ‘Draft Concordia Basic Infrastructure Scheme’</p>	<p>Noted and correct, table to be amended or heading of table to be amended.</p>

Feedback received	Response
<p>quoting the \$728M is only a figure for phases 0 and 1. It does not include phase 2 works which are yet to be determined.</p> <ul style="list-style-type: none">• Table 12 (p.52) in the title refers to phase 1 costs but the actual table includes phase 0 costs.	
<p>Some interventions have no clear champion eg IN-04 in the Funding Plan (p35).</p>	<p>Noted and to be corrected in tables</p>