

11 November 2025

Mr Iain McPhillips
Scheme Coordinator – Concordia Infrastructure Scheme
Department for Housing and Urban Development

By email: [REDACTED]

Dear Mr Iain McPhillips,

Re: Consultation on the draft Concordia Basic Infrastructure Scheme

I write in response to your letter dated 16 October 2025 regarding consultation on the draft Concordia Basic Infrastructure Scheme (the 'Scheme').

Thank you for the opportunity to provide feedback on the Scheme and associated documentation as outlined in your letter.

Please find attached a summary of feedback as endorsed by Council on 18 November 2025. The scheme documentation and the return feedback have all been considered and compiled in confidence.

It is recognised that an extraordinary amount of effort has gone into the preparation of the documents provided for consultation. The upfront commitment of infrastructure investment by the State Government is positively noted.

The complexity, technical nature and volume of information provided for review in the time allocated, in many instances as a first-time review, has been challenging. I would suggest further coordinated and integrated engagement with all key stakeholders, to resolve the matters raised, would be useful.

Should you have any queries or wish to discuss the attached feedback, please contact Natasha Weedon – Senior Strategy Advisor at [REDACTED] and Aaron Curtis – Senior Manager Development Services at [REDACTED].

We look forward to feedback and resolution on the matters raised in the attached feedback summary (Attachment 1) working with you on the development of the Concordia Growth Area and delivery of the requisite infrastructure for the viability and prosperity of this future Barossa community.

Sincerely

[REDACTED]
Mr Martin McCarthy
Chief Executive Officer, The Barossa Council



The Barossa Council

Basic Infrastructure Scheme

Summary of feedback from The Barossa Council

Date: 20 November 2025

Introduction

The State Government has prepared a Basic Infrastructure Delivery Scheme (Scheme) in accordance with Part 13 of the Planning, Development and Infrastructure Act 2016 (the Act) and associated documents. Comments provided below relate to the documents listed, noting commentary has not been made on some documentation. It is noted that the quantum and complexity of information provided on consultation, and the timeframe allowed, has made a review challenging. In the absence of earlier engagement, further time and integrated discussions with developer, landholder and infrastructure groups would be useful.

General comments

Misalignment with Concept Plan

- The Basic Infrastructure Scheme and supporting funding plan is heavily informed by the May 2025 Mesh Masterplan, including the allocation of land area for specified uses, dwelling yields, general layout and resulting infrastructure requirements. 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.
- Council queries the impacts of the deviation on land budget and associated costs, which has informed other planning processes relating to the Concept Plan, such as the local social infrastructure deed.

Law, other agreements and policy

- Further information sought on the "Primary Scheme" in relation to the Statutes Amendment (Planning, Infrastructure and Other Matters) Bill 2025 and the implications for the deeds being negotiated for Concordia Growth Area at a state and local level.
- 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?
- Further discussion is welcomed on the powers of the Scheme Coordinator and the implications on planning assessments.
- Further insight into the state deed, which is still in negotiation phase with developers, and the impact on the Scheme is also welcomed.

State infrastructure

- Whilst not within the definition of Basic Infrastructure under the Act, 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.

- Regarding state community facilities, in the absence of indicative/conceptual layout of facilities, how were areas determined?
- The finalisation of a health precinct will have significant implications for the transport network. In the absence of confirmation of the health precinct, capacity within the transport system is required.

Water

- 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?

Transport

- 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.
- It is Council's position that the Link Road from Sturt Highway to Outer Link Road and Outer Link Road should be delivered and maintained by the Department for Infrastructure and Transport.
- 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.
- In the absence of this, at the point of duplication, this cost should be borne by the developers and/or Department for Infrastructure and Transport (DIT) and the asset managed ongoing by DIT.
- 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. The Barossa Council is identified as the asset owner which is contrary to Council's endorsed position that this road should be a boulevard and owned by DIT.
- The intersection of Harris Road/Springbett Road/Concordia Road is not identified as an intersection for inclusion in the scheme. Presume this will need to be a signalised intersection or roundabout and suggest this should be in the scheme.
- A main street is identified on the main north-south connector road (RD-09) which must be corrected and must instead come off one of the intersecting roads.
- 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.
- Sunnydale Avenue 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 Local Rara Traffic management (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.
- Sunnydale Avenue is identified as a collector road on the Approved Concept Plan 161 – Land Use under the Concordia Code Amendment but Cheek Avenue is not.

- 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.
- It is noted that there is no Over Size / Over Mass (OSOM) truck connectivity south of Concordia, with all large truck activity connecting to Adelaide and southern Barossa region via existing Sturt Highway / Gomersal Road connections.
- The Scheme Coordinator will need to monitor construction staging and connectivity links to ensure developers deliver the necessary staged links for the area, including more costly junctions and intersections external to their respective development sites.
- No allowance made for the shared path network within the Infrastructure Scheme. It is presumed this will be an obligation for each developer as part of their land division and infrastructure works.

Other infrastructure

- The additional South Australian Power Network 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.

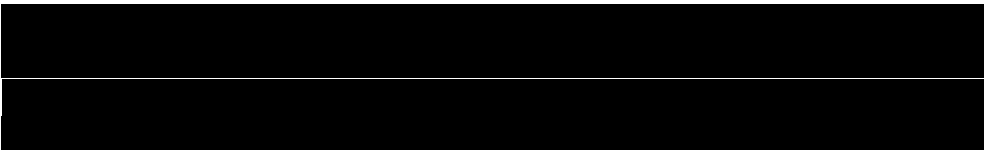
Document: Concordia Basic Infrastructure Scheme (dated 13 October 2025)

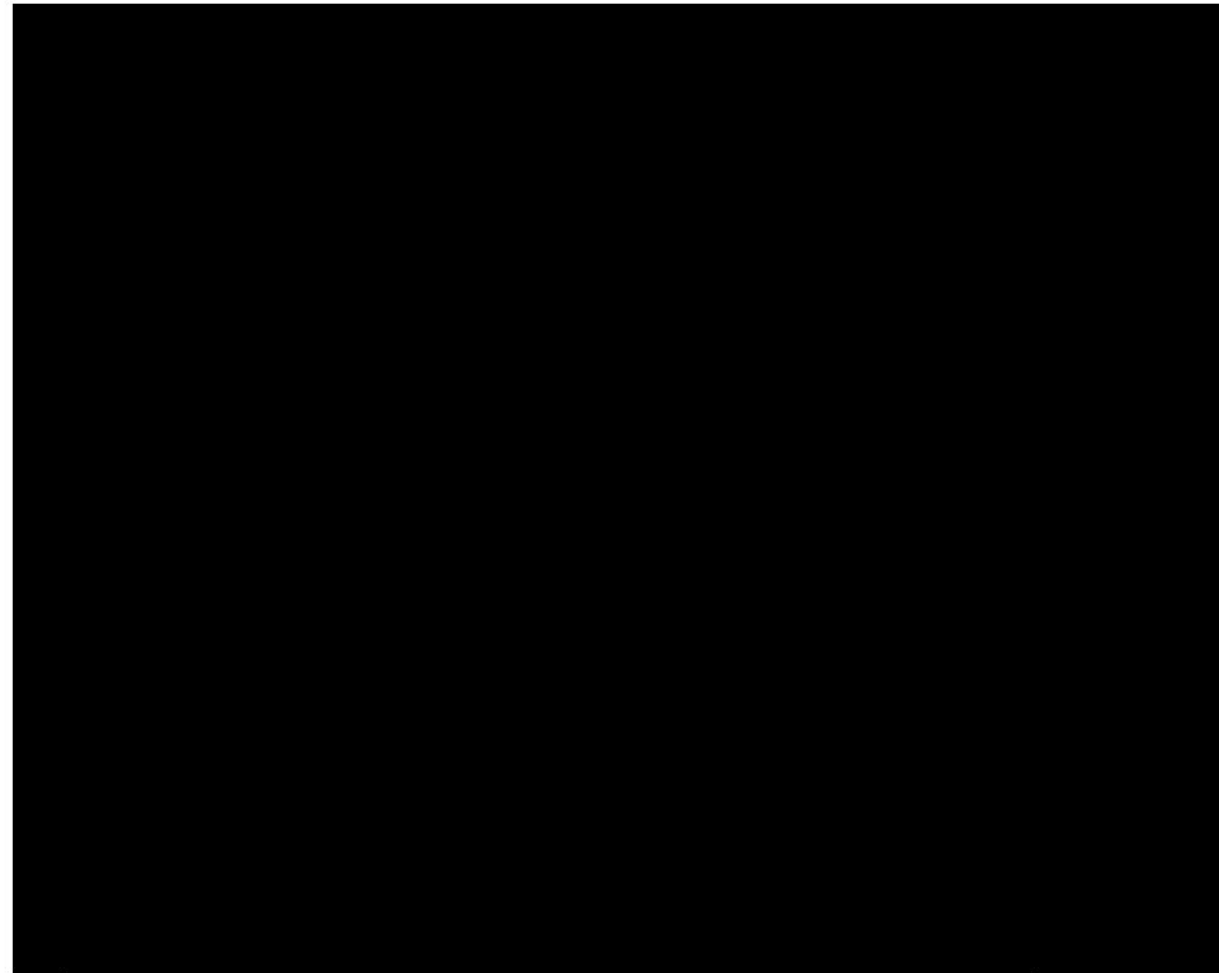
Detailed comments

Executive Summary (page 5)

- The Charge, as outlined in Scheme Funding Arrangement, relates only to infrastructure to be delivered in Phase 0 and Phase 1 of the CGA and the cost share components of the central road network. It is noted that the Charge is still to be resolved for Phase 2. This does not yet provide any certainty for developers/landowners for development beyond the 2600th lot. Council is concerned that this may impact future delivery beyond 2600 lots.
- 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."

Figure 1 (page 7)

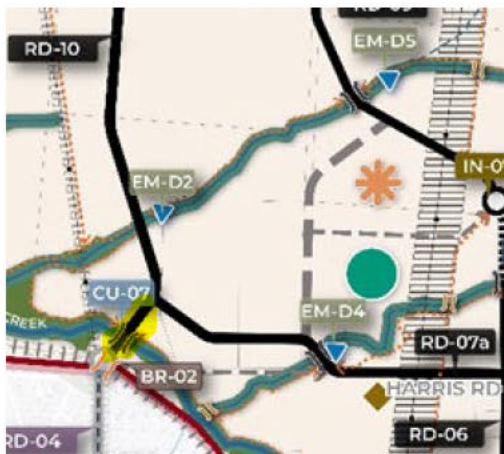
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- Are there existing public roads / road reserves that are going to be closed and added to the net developable area? If so, how have these been taken into account in the calculations? How will Council be compensated?

Figure 2 (page 8)

- Two "possible Connector Roads" are noted. Are these roads optional (i.e. replacing other connector roads), likely or unlikely? If required, are they to be solely delivered by the relevant developer at their expense or is some cost-sharing with a Charge appropriate?
- Query if IN-05 requires signalling at this junction?
- Seek detail on definition of 'stop/start' points (e.g. RD-10, RD-11, RD-08). There seems to be a gap for the short section of road between the junction of RD-10 and RD-07a and BR-02. This requires another label (e.g. RD-10a)



Refer image above: See yellow highlight

Plan 1 (page 9)

- Should CU-02 be included in Phase 0?

Plan 2 (page 10)

- Is EM-D6 integral to RD-08 and, if so, should it be included in Phase 1?

Plan 3 (page 11)

- 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 different landowners/developers.

Table 3 and Table 4 (pages 26-36)

- Seek clarification of wording (e.g. RD-09 "~~Construction~~ Creation of a new 23.2m wide corridor and construction of a new connector road...")
- Seek further detail and clarification on scope/extent of infrastructure (e.g. RD-09 to be constructed from Harris Road to ST-05.)
- 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.
- RD-13 delivery is noted as by 'developers'. To which developer does this refer, as none own this land / existing road reserve?
- Delivery responsibility is not stated for IN-04.
- Seek clarity for BR-02. Is a pedestrian bridge required even if a road bridge is not being provided?
- 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?
- CU-08 to CU-12 do not appear on any plans and need to be captured.
- SP-01 is shown on the plans but not mentioned anywhere in the document regarding Charge, Delivery responsibility etc.

17 Infrastructure Delivery (page 63)

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:

- 30% concept with cost estimate
- 70-80% design with cost estimate
- 100% design for construction with tender estimate

Appendix D – Works Program (page 72-73)

- 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.

Document: Concordia Infrastructure Funding Plan (15 October 2025)

General feedback

- It is unclear what the estimated proposed total charge will be on landowners/developers for all Charges (Basic, Social, Water/Wastewater,

Public Transport) for residential dwellings and non-residential uses. Is it still viable to develop, particularly in Phase 2?

3.3.1 Transport Infrastructure (pg. 18)

- Noted that the Sunnydale / Concordia Road TIS Option 2 is “preferred” and has been used for the Charge.
- Option 2 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.

3.3.3 Stormwater Management (pg. 22-23)

Whilst the Concordia Growth Area Final Stormwater Management Strategy appears reasonable in terms of the required deliverable outcomes vs site constraints, there are several items of concern.

- 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 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. 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.
- 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. The risks are significant due to the steep terrain longitudinal grades, narrow V formation watercourse cross section and soil types.
- 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. This has been noted in our previous feedback during the investigative phase led by State Government.

3.3.5 Water & Wastewater (pg. 24-25)

- It is noted that 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.
- It is noted that SA Water have not provided guidance on the ultimate scope and extent of proposed wastewater treatment and treated wastewater disposal infrastructure required for the development. Council believe that it would be feasible to calculate a projected scenario including space required for plant footprint and trunk infrastructure, which could be costed

and constructed in stages to manage uncertainty and avoid upfront capital expenditure.

5.1 Transport Infrastructure (pg. 28-29)

- Is the Cheek Avenue connection to Concordia for vehicles an essential requirement or optional at the developer's discretion?

5.1.1 Internal Collector Roads, Intersections and Bridges Infrastructure (pg. 29)

- Suggest close attention will be required by the Scheme Coordinator to monitor interactions of developers in delivery of these internal collector roads between landowners, particularly junctions/intersections.

5.4 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.

Table 3 (pg. 31-40)

- 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*"?

5.9.1 & 5.9.2 Phase 0 & Phase 1 Projects (pg 54 - 55)

- It is noted that an equal allocation applies to the first 600 lots. Will an equal allocation also apply to the next 2000 lots? Please refer to earlier comments on water allocation.
- 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.

Appendix H

- 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 (13 Oct 2025) document. See comments on that document.

Document: Draft Scheme Policy 3 – Works Program

General comments

- 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. This will also help with Works-In-Kind proposals and prevent any sacrificial works / overbuild.
- 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?

Other

- Further information sought on state school sizes (5.4ha each) in terms of layout and inclusions, and co-location preference.
- Metropolitan Fire Service (MF) site (0.7ha) is not shown on the Concept Plan. Where is it expected to be located? This question has also been put to Planning and Land Use Services.

Land Budget

It is noted that there are discrepancies between the Scheme and the current land budgets through the negotiation of a social infrastructure deed with landholders. Council seeks correction to align with agreed position with developers.

Sites	Budget Plan Allocations	Draft Deed Allocations	Difference	Rationale
Area 1	9.19	12.56	-3.37	Larger land area required to accommodate all sporting and recreation facilities and manage topography.
Area 2	8	8.54	-0.54	Larger land area required to accommodate all sporting and recreation facilities and manage topography.
Area 3	8.15	9.51	-1.36	Larger land area required to accommodate all sporting and recreation facilities and manage topography.
Area 4	7.13	6.66	0.47	Smaller land area required to accommodate allocated sporting and recreation facilities.
District Park	3	3.82	-0.82	Larger land area required to accommodate shared courts and skating facilities.
Community Centres	2.68	1	1.68	Less area required as centres consolidated within sport and recreation areas, with only one standalone community hub.
Totals	38.15	42.09	-3.94	

Other deviations noted:

- Land budget assumes 18.43 (total) passive open space allocation within transmission line corridor. Council has a position of not accepting land under powerlines towards the open space contribution calculation.
- Areas allocated for schools are far less than prescribed in the Code Amendment Concept Plan. Please review.
- The land budget does not calculate the impact of buffers along either Barossa Valley Way or the connector/ring road. Please review.

20 November 2025

Mr Iain McPhillips
Scheme Coordinator
Concordia Infrastructure Scheme
Department for Housing and Urban Development
GPO Box 1475
ADELAIDE SA 5001

Town of Gawler Administration Centre
43 High Street
Gawler East SA 5118
PO Box 130
Gawler SA 5118
Phone: (08) 8522 9211
council@gawler.sa.gov.au
gawler.sa.gov.au

Dear Iain,

Feedback on Concordia Basic Infrastructure Scheme

I am writing to provide the Town of Gawler's submission on the draft Concordia Basic Infrastructure Scheme (this letter). It is noted that the closing date for submissions was 23 November 2025, but as the Council meeting is scheduled for 25 November, we appreciate the Department for Housing and Urban Development (DHUD) willingness to accept our submission.

Council wants to start by acknowledging the work undertaken by DHUD, in collaboration with The Barossa Council, Town of Gawler, developers within Concordia and all other stakeholders. It is a complex undertaking to complete structure plans, code amendments, co-ordination of agencies and develop a blueprint for funding essential infrastructure. At a broad level, the strong alignment between Town of Gawler's strategic and infrastructure planning with that shown in the Concordia Basic Infrastructure Scheme is acknowledged and supported.

Whilst there remain a range of issues to still resolve, Council, recognise that these issues either sit outside the scope of the Concordia Basic Infrastructure Scheme - such as rail upgrades or the proposed medical precinct, a relatively recent addition to the structure plan. Other matters will be dealt with separately as future information comes to hand. In this category are such matters as the design and funding model for Sturt Highway connection, now identified as a State delivered project, specific water and sewer interventions in proposed phase 2 and the freight route to Sturt Highway.

Council's submission notes that as a 'live' Scheme, with mechanisms for review, there will always be infrastructure elements which at any point in time have more design input and funding resolutions than other aspects and that these will be resolved appropriately to equitably and timely fund essential infrastructure.

Submission:

On the basis that the Town of Gawler supports the Basic Infrastructure Scheme as a whole, the following matters are identified for DHUD review and consideration to further strengthen future infrastructure delivery:

1. Hierarchy of reports and infrastructure commitment clarity: There are a range of documents released by DHUD that either underpin or constitute the Basic Infrastructure Scheme. Having reviewed these documents, scope for greater clarity exists from a public perspective. For instance, the document 'Concordia Basic Infrastructure Scheme' has maps for phase 0-2. But these relate to substantially roads, intersections and bridges. There are no maps in this document that relate to SA Water initiatives with sewer and water infrastructure (they are in Appendix G). The same is evident with the Funding Plan document which also has no maps relating to water or wastewater interventions.

Ideally these water and sewer interventions should be addressed in the main documents, if possible. It is suggested the details from Appendix G for instance should be visible in these key reports including the proposed package treatment plant in phase 1. Whilst it is accepted that the funding plan tables for each phase explains the interventions such as tables 10-12 in the Funding Plan, the lack of visual representation in the key maps could be enhanced. As a guide, the DHUD slide pack used in Council workshops more clearly explains the interventions proposed in a visual form.

2. Co-ordinated delivery of infrastructure – A substantial package of road upgrades is proposed within the Town of Gawler – see Figure 1 and Figure 2. This approach is supported, noting that it reflects (a) the supplementary modelling and design work of AECOM; (b) the updated funding/cost plan at 5% design level provided by RLB; and (c) addresses the latest road design thinking by SPIIRE for the southern end of the Cheek Avenue corridor.

[REDACTED]

[REDACTED] The corridor will need to be project co-ordinated and delivered before phase 1 housing development is progressed in any substantial manner. Whilst it may sit outside the Basic Infrastructure Scheme, there needs to be an acknowledgment that even with the funding Council has committed in principle (together with funding by other parties under the Gawler East Separate Rate), Council cannot fund or deliver a project of a similar quantum/scale to the Schomburgk Drive project recently delivered by the Department of Infrastructure and Transport (DIT). Realistically, the Cheek Avenue corridor project, developed in parallel with phase 1 works on Barossa Valley Way, co-ordinated via DHUD/DIT is a more practicable and effective solution.

[REDACTED]

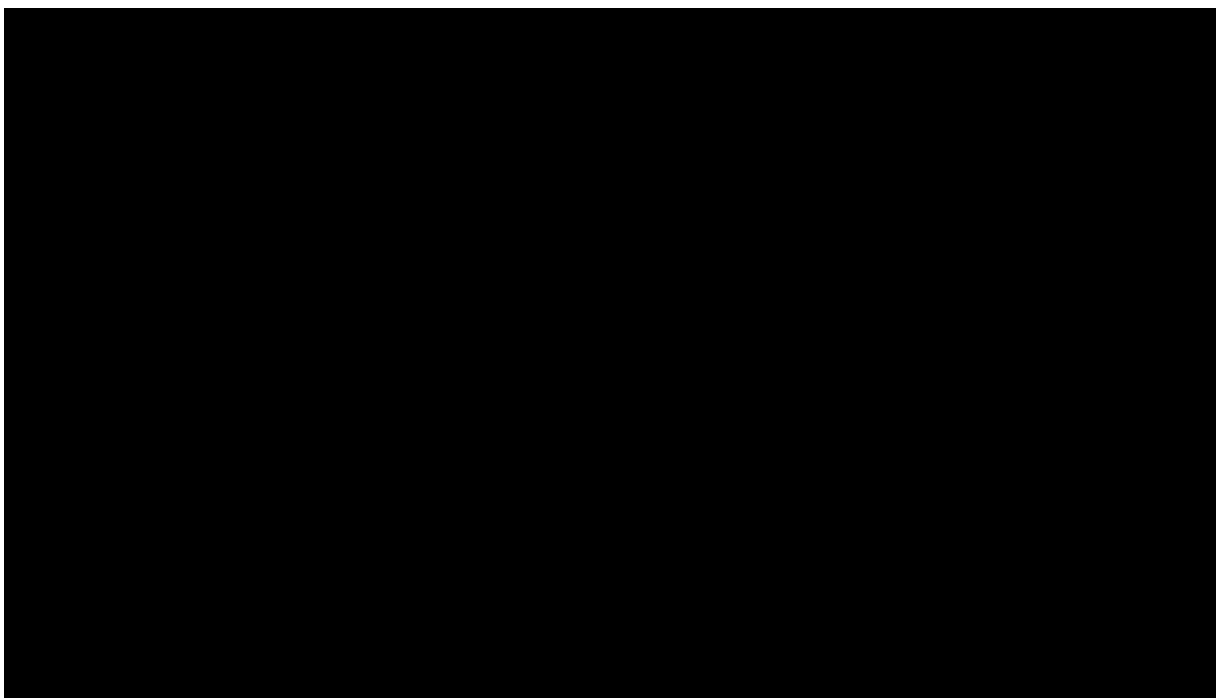
[REDACTED]

[REDACTED] A separate Deed would be required between Council and DIT, similar to the mechanism in place on Schomburgk Drive, with DIT to recoup money from CGA parties and Council to update its Gawler East separate rate and long term financial plan against agreed timing/lot triggers.

Separately, Council foreshadows that it will need in the near future seek to revisit with DHUD and the Planning Minister the funding of IN-03 as a State owned road asset ie Cheek Avenue/Barossa Valley Way junction. At present, approximately 84 % of traffic either enters

or departs onto the state road network (Barossa Valley Way). While CGA has some responsibility to the delivery of Cheek Avenue / Barossa Valley Way, the Department for Infrastructure and Transport (DIT) also have a crucial role, not only as the end asset owner but supporting both current and future regional traffic.

Council recognises that it has a funding obligation as set out in the current Gawler East separate rate, amongst other stakeholders, to assist with these works. But equally, as Concordia is a State priority under the housing road map, such a significant project should attract State Government funding commitment as a funding partner – as opposed to being a financial lender for forward delivered capital works.



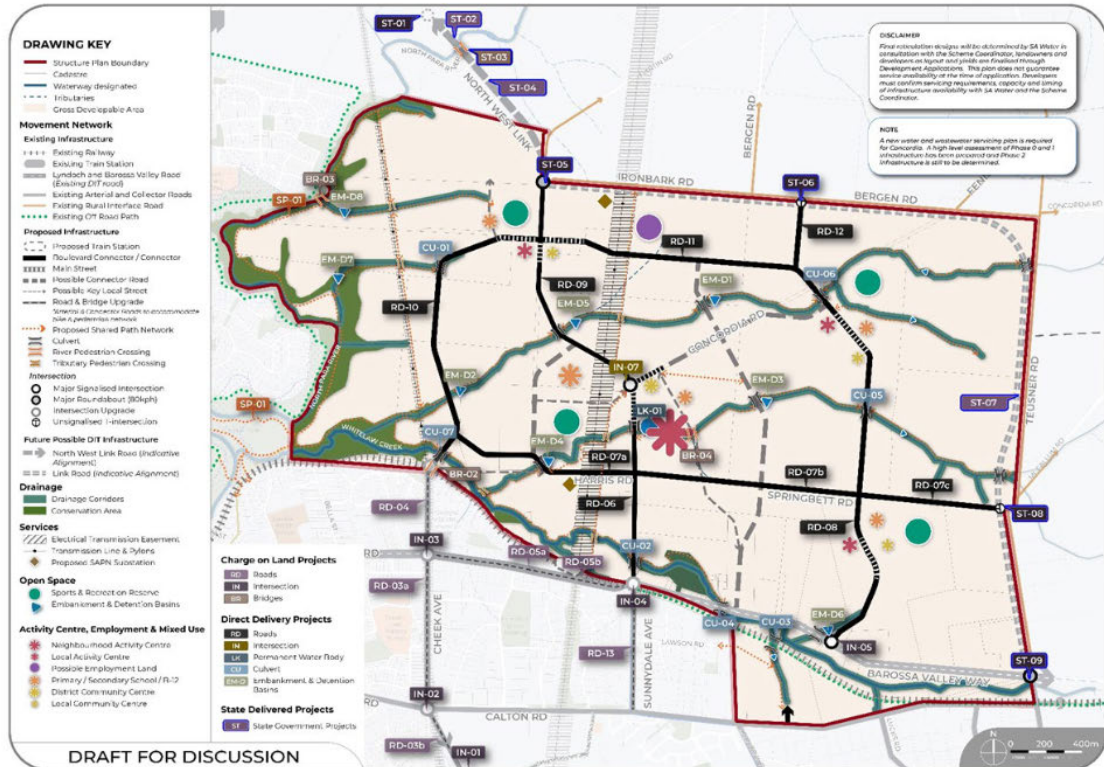


Figure 2: Cheek Avenue interventions (DHUD – Basic Infrastructure Scheme, 2025, p. 8)

3. Sturt Highway Bypass – Interventions ST-01 through to ST-09 (Sturt Highway Bypass) do not have a delivery trigger other than being in phase 2 – so around 2036 at this stage. A lack of timing on this intervention creates a greater safety risk and further detracts from the amenity of Murray Street, as this would remain the only viable entry to Lyndoch Road from the Sturt Highway for some time. Once the Cheek Avenue corridor and Barossa Valley Way upgrades are completed in phase 1, there may be some merit in revisiting signage and way-finding to encourage this movement as opposed to movements through Murray Street. Council has recently invested in and installed improved way finding on Potts Road and Schomburgk Drive to support the growth areas.
4. Funding the Freight bypass - The Basic Infrastructure Scheme contemplates the freight bypass as shown in Figure 1B as State delivered infrastructure. This position is not contested as there are regional benefits in this approach.

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.

5. Stormwater off-site works and catchment impacts - The focus of the engineering design for Concordia stormwater hydraulic design relates exclusively to in-catchment detention within Concordia. This is set out in the Tonkin report at Appendix G of the exhibition documents. 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.

Scenario/Option	Average annual runoff volume (ML/year) *		
	Whitelaw Creek	North Para River	Concordia Total
Pre-Dev	226	23	249
Post-Dev (unmitigated)	1369	223	1592
Option 1	503 (-63%)	135(-39%)	638 (-60%)
Option 2	639 (-53%)	147 (-34%)	785 (-51%)
Option 2A	569 (-58%)	129 (-43%)	697 (-56%)
Option 3	475 (-65%)	95 (-57%)	569 (-64%)

* Values in brackets represent the percentage reduction of runoff volume achieved relative to the post-development (unmitigated) scenario

Table 1: Summary of average annual runoff volume discharged for various scenarios/options (Tonkin, 2025, p.47)

Based on the information provided, there are a few matters of note to consider:

- It is stated in the Tonkin report (p.47) that post flow runoff will significantly exceed on-site 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.
- 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 Basic Infrastructure 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.

Whilst it is acknowledged that the Storm Water Management Strategy (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.

6. The funding model for infrastructure –What is proposed is broadly supported. Nonetheless, it is a complex model as it entails landowner charges, State forward funding for some infrastructure across three local government areas (Light, Barossa, Gawler) and includes unknown elements such as phase 2 costings, cost of Sturt Highway etc. Some clarity is therefore useful, noting the following:

- [REDACTED]
- Table 12 (p.52) in the title refers to phase 1 costs but the actual table includes phase 0 costs.
- It has been mentioned in briefings about network upgrades for sewer and water costed by SA Water extend beyond just benefits to Concordia. Documentation reviewed provides limited explanation of the nature of these upgrades. Council would be keen to have a clearer explanation of what these network upgrades from SA Water likely entail as it may materially impact (likely positively) planning by Town of Gawler and its neighbour councils such as Light Regional Council.

The Scheme identifies the below in section 7 Water Supply, with key areas within Gawler highlighted in yellow:

*“Enabling works (trunk infrastructure as identified in **Table 5**) to service the CGA will be sized to also benefit other surrounding growth areas. Advice provided by SA Water as the service Authority for the provision of this infrastructure indicates that the CGA is a beneficiary of this investment in the order of approximately 20% of the water capacity provided by this infrastructure. Accordingly, the apportioned costs have been applied against the total costs as this infrastructure will benefit other growth areas including:*

- **Kudla**
- *Blakeview*
- **Gawler East**
- *Roseworthy”*

Further discussions with SA Water post Scheme adoption will provide further clarity on how these network improvements will occur.

7. Exclusions from Basic Infrastructure Scheme - There are a range of infrastructure exclusions, that go beyond what a basic infrastructure scheme can deliver – hence not shown in the Scheme. These include, in no particular order:
- The medical centre precinct shown on the structure plan;
 - Concordia train station and line upgrades;
 - rail plus pass loops and Murray St treatment;
 - pedestrian and bicycle linkages;
 - Biolink commitments on North Para River and Whitelaw Creek; and
 - social infrastructure.

It might be useful to have a chart or table which shows clearly how each type of required infrastructure is delivered, by when and by what funding mechanism eg schemes, deeds or other. Presumably utilities are funded under a business case eg gas, communications etc? This could be more clearly stated in 4.2 of the Concordia Basic Infrastructure Scheme – draft for Consultation perhaps. There is probably better coverage of this issue in section 4 of the Funding Plan.

8. Intervention champions - Some interventions have no clear champion eg IN-04 in the Funding Plan (p35). This is the Barossa Valley Way/Concordia Rd intersection. The Infrastructure Funding Plan (IFP) at figure 12 and table 10 says it is to be delivered under the scheme and can be works in kind (WIK). This just needs updating, so one table matches another.
9. Passenger rail upgrades – Passenger rail network 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.

DHUD are in a difficult situation modelling needs without relevant agency input on a timeline on rail corridor upgrades. But the absence of clear timelines will likely impact journey to work results and local traffic volumes if car ownership levels are high in Concordia. How is this to be resolved?

It is a reasonable expectation that this information be provided without delay to assist DHUD in administering the Scheme, assist Town of Gawler with its Town Centre Structure Plan (currently underway) and provide greater confidence on the State commitment to public transport in Concordia.

10. Sunnydale Avenue upgrades - Due to location relative to the Concordia Road entrance, Sunnydale Avenue will experience more traffic than it does today. The basic infrastructure scheme proposes this only be catered for in phase 0 before the Cheek Avenue corridor is upgraded. The approach is pragmatic and broadly accepted.

[REDACTED]

[REDACTED] 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. In this context, the absence of a roundabout on the junction of Sunnydale Avenue and Calton Road, as foreshadowed by AECOM as critical for priority through movement, is also supported. Sunnydale Avenue should be managed as a local road only and major works which would expand this function and facilitate more traffic volume should not be encouraged. It is not a priority volume traffic route.

[REDACTED]

[REDACTED] The actual cost difference quoted is understated, as the Sunnydale option as shown is likely even more expensive, since it does not include:

- the costs for upgrades of Calton Road from Sunnydale Avenue junction with Calton Rd to Mullamar Way roundabout.
- The costs for any upgrade of the Mullamar Way roundabout.
- The costs for upgrading Mullamar Way to the intersection with Schomburgk Drive.
- The potential/likely need to acquire land and impact buildings within the Springwood Shopping Centre to achieve priority turn movements.

[REDACTED]

11. Who owns bridge assets? – Bridge BR-02 has been identified as Town of Gawler / Barossa Council maintained asset. The Town of 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.

12. The Infrastructure Funding Plan needs clarification - On p17 of the Funding Plan it states in paragraph 5 the original scope of Council planning and interventions for the Cheek Avenue corridor, as below:

The original scope of Cheek Avenue upgrades by Council are understood to be in planning, with Council anticipating delivery of these works in coming years in line with the development of the CGA. The Town of Gawler has included these works in its existing programme and has committed to managing the design, construction, and project oversight as soon as practicable, providing an opportunity for the increased scope of infrastructure to service the CGA to be included within these works. It is understood that works for the southern portion known as McMillan Parade (referred to as projects IN-01-IN-02 and RD-03b in this document) have already been designed.

The first sentence should read ‘...in line with the development of Gawler East’, not CGA. Accommodating the traffic impacts of Gawler East on the network was the reason behind the original scope of Cheek Avenue works, as set out in the Gawler East Separate Rate and associated Deed. What has happened in the last 12-18 months is modelling the additional costs of servicing Concordia via the same road network. This nuance needs to be reflected in the documentation. On the whole, the documentation provided by DHUD does this well, the Funding Plan at p17 just needs more clarity.

13. Future of Kalbeeba Road – It is noted that Town of Gawler has been keen to explore the future role of Kalbeeba Road 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.

As stated earlier in this submission, Council broadly support the notion of distributed traffic flow and limited/managed increase on Sunnysdale Avenue, with priority being Cheek Avenue Corridor. Kalbeeba Road has not been modelled by DHUD 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 Road to the Sturt via the perimeter of the Concordia growth area.

14. Intervention SP-01 – 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?

Advice received indicates SP-01 is a social infrastructure element that could not be covered as a scheme project within the scheme. It has been dealt with in the Code Amendment and noted on the Code Concept Plan 161. That advice highlights the complexity of select infrastructure items being under the basic infrastructure scheme, other elements being outside the scheme and the challenge in determining whether Town of Gawler feedback on links and trails is being addressed.

15. Role and need for RD-04: Road intervention RD-04 comprises the northern element of Cheek Avenue from Barossa Valley Way/Cheek Avenue 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 Concordia Growth Area as a Town of Gawler asset. Indicative timing in the Funding Plan (p31) is 2040. Given the significant upgrades of Cheek Avenue 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 Basic 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.

16. Absence of information on biolinks on North Para River/Whitelaw Creek and pedestrian and cycle trails: 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.

Likewise, biolinks on North Para River and Whitelaw Creek were identified for further attention in the Council submission on the Concordia Code Amendment. It is recognised that additional screening and landscaping is proposed on Barossa Valley Way but there is an absence of detail on what is proposed. Again, 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.

Overview and Conclusion

The Town of Gawler acknowledges the efforts of DHUD in preparing the draft Basic Infrastructure Scheme and note that it is the first such scheme prepared in South Australia. As such, it will be an evolving Scheme, subject to ongoing monitoring.

Council is particularly pleased that the underpinning strategic work undertaken by the Town of Gawler has been a direct input to the process and that, moreover, the background studies within Concordia have involved ongoing discussions with Council staff. Funding of off-site road interventions in phase 1 of the project is a case in point of what co-ordinated planning can achieve between local and State government.

With respect to the Cheek Avenue corridor and its costings to deliver as a set of traffic interventions, it is acknowledged that more detailed civil design of proposed interventions in recent months has provided greater clarity on project delivery costs. These same design assumptions have now been input into the pre-Concordia design costings to establish the net additional costs imposed by the release of Concordia on the local road system. On the basis that there are consistent assumptions on

unit rates and quantities for different road design solutions, the final costs for each phase 1 intervention can now be completed prior to adoption of the basic infrastructure scheme. To this end, Council staff will work through these issues at an officer level with DHUD in coming weeks, consistent with the basic infrastructure scheme including user pays principles, transparency and nexus between demand and supply of capital works.

Some important issues remain to be resolved in the short to medium term. These relate to (amongst other matters):

- the timing and funding model for the Sturt Highway connection;
- rail upgrades to Concordia and how this limits impact on Murray Street, Gawler;
- off-site stormwater management within North Para River, Whitelaw Creek and downstream into Gawler River including the optimal methods to provide a catchment solution (land division process, via GRFMA or via State Government co-ordination); and
- further articulating what SA Water enabling infrastructure can achieve more widely in the catchment to bring other growth fronts to market consistent with the housing road map.

We look forward to seeing the Scheme finalised and working through outstanding issues as well as the next steps, noting that the experiences at Concordia will inform future planning and agency co-ordination as planning for Kudla Structure Plan commences.

If you have any questions in relation to this submission, please contact Council's Executive Manager Development and Compliance Andrew Goodsell on [REDACTED].

Yours sincerely

[REDACTED]

Chris Cowley
Chief Executive Officer

Direct line: [REDACTED]
Email: [REDACTED]

-----Original Message-----

From: Clay Donlon [REDACTED]

Sent: Friday, 21 November 2025 4:26 PM

To: DHUD:GIC Unit <dhud.gicunit@sa.gov.au>

Subject: : Request for Clarification and Updates – Concordia Development Impacts on Our Property

Hello,

Following our review of the Concordia Development documentation in relation to our 3.88 Hectare property, which includes approximately 460 metres of Whitelaw Creek and an unnamed tributary, we would like to raise several matters that require clarification, correction, or further discussion. We respectfully request an update on the following points:

1. Incorrect Classification of Conservation Reserve

The Concordia Infrastructure Funding document lists 2.3 hectares of pre-existing Conservation Reserve on our property. This is incorrect. We have previously confirmed with Council and the relevant State Government departments that no such designation exists on our land.

We request that the Concordia Growth Area Property Specific Land Use Budget be amended to reflect this and classify the area as new, not existing.

2. Increased Water Flow and Hydrological Impact

The Tonkin Final Stormwater Strategy (15 April 2025) indicates that Option 3 would result in more than double the current annual water runoff into Whitelaw Creek and the unnamed tributary running into the middle of our property.

We are still awaiting advice on how the increased water flow and the resulting hydrological impacts on our property will be managed long-term.

3. Biodiversity and Restoration Report Inconsistencies

The Concordia Biodiversity Survey Restoration Report references our land as the “Harnett property” (after the previous owner) and identifies it as a priority for restoration work. However, it has been excluded from the Whitelaw Creek restoration budget and downgraded to low importance in more recent reporting.

We seek clarification on the intended ongoing strategy for restoration and management of this section of the creek, especially given the anticipated increase in water flow.

4. Open Space Requirements

We understand from the reports that a development creating 20 or more allotments must provide 12.5% open space. The mapping for our property appears to already allocate significant areas as open space. We request confirmation as to whether this is the case and how this aligns with open-space contribution requirements.

5. Unnamed Tributary – New Drainage Corridor

A section of the unnamed tributary on our land has been designated as a new drainage corridor and marked as land required for this purpose. We ask at what stage this matter will be formally discussed with us and what process will be followed.

6. Omission of Dwelling and Structures on Future Urban Report Map

The Future Urban Report map does not show our dwelling or existing structures. We seek clarification on whether this omission is influencing the low level of consultation or consideration given to our property in the growth area planning.

7. Lack of Consultation Regarding Significant Impacts

While we understand that our property is small in the overall scale of the development, it is significant to us. To date, we have not been consulted about major proposed changes to our land.

We request clear advice on when formal engagement with us will occur, and how our input will be incorporated into future planning decisions.

We would appreciate written responses to the above points, as well as an indication of the appropriate contacts for ongoing discussions.

Thank you for your attention to these matters. We look forward to working collaboratively to ensure accurate planning and fair outcomes for all parties involved.

Kind regards,

Clay and Lisa Donlon



URPS

Adelaide
27 Halifax Street
Adelaide SA 5000
08 8333 7999

urps.com.au

ADL | MEL | PER

26 November 2025

Iain McPhillips
Executive Director
Department for Housing and Urban Development



Dear Iain

Infrastructure Delivery Schemes Submission

Thank you for the opportunity to comment on the following documents that collectively make up the Infrastructure Scheme framework:

- Concordia Basic Infrastructure Scheme Draft for Consultation (13 October 2025)
- Concordia Infrastructure Funding Plan (15 October 2025)
- Draft Basic Infrastructure Scheme – Planning Referrals and Preliminary Agreements
- Draft Basic Infrastructure Scheme – Works-in-kind Agreements
- Draft Basic Infrastructure Scheme – Works Program
- Draft Basic Infrastructure Scheme – Reviews and Variations.

Firstly, we acknowledge that this Infrastructure Scheme is the first of its kind in South Australia and sets an important benchmark for future schemes. For this reason, it is critical that any procedures, and the charge applied to land is fair, equitable, and underpinned by robust evidence.

Secondly, as a guiding principle for future success, we believe collaboration with all stakeholders is essential to maximise benefits for all parties, including the future community that will ultimately benefit from the development.

The model of participation and open dialogue adopted throughout this process has been a positive aspect of the project, and we strongly support ongoing engagement during refinement and implementation.

The cashflow provided by Government for infrastructure is welcome and demonstrates a strong commitment to support the development of Concordia. This is a key benefit of the Infrastructure Scheme.

Our Position

Metro Homes does not support the Concordia Infrastructure Funding Plan in its current form. We believe the infrastructure charge is overly inflated, however, we are prepared to accept it for now in the interest of keeping this project moving and provided the scope of infrastructure identified in the funding plan is expanded.

Metro Homes and Concordia Lands Trust (CLT) have jointly developed an alternative funding plan that both parties agree upon. This plan maintains the proposed land charge but delivers significantly greater value. It is informed by network analysis, end-user needs, and expert cost estimates, including substantial contingencies. This approach ensures infrastructure delivery supports project feasibility while remaining within the proposed charge.


[REDACTED]


While we acknowledge the urgency to progress the Scheme, it is essential that the infrastructure to be delivered is resolved prior to adoption. We therefore ask that Government give careful consideration to our proposed Plan, which is fairer and more reasonable than the current proposal.

[REDACTED]

Submission Summary:

- **Timing of cost releases:** The timeframes associated with the release of costings have placed all entities under considerable pressure. However, CLT and Metro have collaborated to develop a comprehensive plan that takes a sensible approach to infrastructure delivery.
- **Costing rigour:** Order of Magnitude costings presented in the Mesh Infrastructure Funding Plan (IFP) have not been appropriately prepared in accordance with the Basic Infrastructure Scheme Outline. As a result, the costings are significantly inflating the infrastructure charge on land for what is being delivered, to the extent that project feasibility is materially impacted. This raises serious concerns about the methodology used to establish the charge on land, which is addressed through our Proposal.

- 
- **Misalignment of infrastructure staging:** The proposed timing for the construction of IN05 Collector Road as part of Phase 1 does not align with the anticipated staging of the development. Metro Homes' development will not reach this point within the proposed timeframe due to SA Water timing.
 - **Education facilities:** The proposal to set aside 5.1 ha of land for a State Primary School is excessive and removes land and choice from the market. Our assessment is that 3.5 ha should be sufficient for a primary school, with shared oval arrangements. This must be reviewed in conjunction with the Social Infrastructure land take requirements. Market rates need to be applied to the land acquired. There needs to be flexibility for the provision of a private school should this opportunity arise.

- 
- **Future charge:** The Scheme supports infrastructure delivery for up to 2,000 allotments or until 2036. While the charge for Phase 1 is defined, the charge for subsequent years (Phase 2) is yet to be determined. The Scheme states that this should be resolved no later than 24 months after the completion of Phase 1, or at the completion of 1800 allotments. This Charge should be set now to provide certainty that water will be supplied to Phase 2.
 - **Waste water:** The Scheme should be amended to confirm that Waste Water can be serviced through a private scheme.

Infrastructure Charging

Charge on Land and Capital Costs

Metro Homes and CLT have worked collaboratively to prepare a Funding Plan for Transport Infrastructure projects. This is described in the attachments which include:

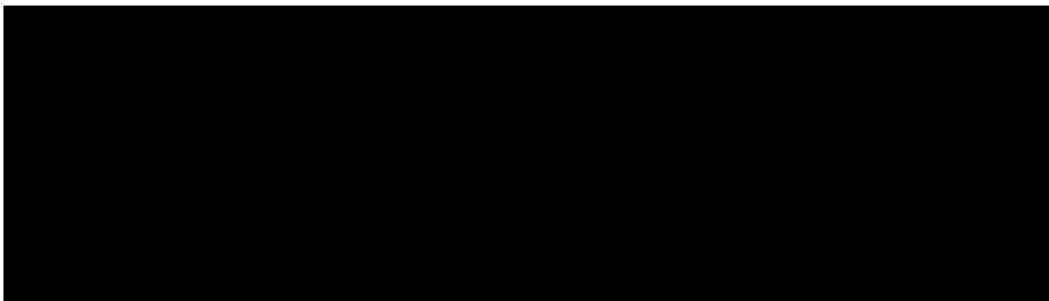
- **Transport Projects:** Funding map and table, including transport projects description, liable parties, cost apportionment and justification.
- **State Government Cashflow:** Funding map and supporting table which identifies description, cost, and cost justification.

Metro Homes notes the principles outlined in the *Planning, Development and Infrastructure Act 2016* regarding the imposition of charges under Subdivision 7.

A key principle is that any charge should be limited to recovering the *reasonable capital* costs of basic or primary infrastructure. Our review of the costings has identified significant allocations for design, project management, and contingencies within the funding plan. This new Proposal reflects sound planning, fairness, and efficiency, aligning with the objectives of the Scheme and the expectations of stakeholders.

Key points to note:

- **Inappropriate costing standard:** The Basic 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.
- **Insufficient design detail:** DIT EST 600 specifies that Level 3–4 estimates should be based on 5–30% design completion. The referenced costings lack sufficient design detail and scope definition, limiting the ability to critically assess the estimates and leaving them open to long-term interpretation (e.g. designing to a budget rather than to infrastructure requirements). 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.



- **Cheek Avenue apportionment:** The analysis by Metro Homes suggest that the intersection treatments adopted in the original Gawler East intersection designs were insufficient for the expected traffic volumes at the time. The Concordia Growth Area (CGA), does not increase the actual design requirements, which remain the same. However, the costs have increased significantly (summarised below).

Works	Key Issues
Cheek Avenue works (RD03a and RD03b)	<ul style="list-style-type: none"> • Correspondence with DHUD and our review of AECOM traffic reports and the Mesh IFP indicate that the CGA is expected to cover costs for any increase in road cross sections due to traffic generated by the area. • However, RLB costing confirms there is no additional quantity of road works required compared to Gawler East. • The higher costs applied to CGA are instead due to added elements, increased rates, and higher contingencies/overheads. Costs have been calculated as a straight difference between May and October RLB costings rather than based on actual additional road work required under the funding plan.
Cheek Avenue roundabouts (IN01, IN02)	<ul style="list-style-type: none"> • The Gawler East scope was costed at a much lower design level compared to the CGA option prepared by AECOM. AECOM reports note that both IN01 and IN02 for Gawler East were based on undersized roundabouts that would not likely meet authority requirements for large vehicle movements. Importantly, adding CGA traffic does not change the need for a roundabout designed for large vehicles, as roundabout sizing is determined by movement paths rather than traffic volumes—an increase in traffic does not require a larger diameter roundabout.
Cheek Avenue/Barossa Valley Way signals (IN03)	<ul style="list-style-type: none"> • RLB costed a pictorial concept of a roundabout for the Gawler East cost in October 2025. AECOM costed a signals option in October 2025 based on a concept drawing. • Costs attributed to CGA have been based on the simple cost difference between RLB and AECOM costing. Due to the significant difference in costing methodology between AECOM and RLB, the costs cannot be compared and should not be utilised to calculate a charge. A more appropriate way would be to have both options costed by either AECOM or RLB.

Works	Key Issues
<ul style="list-style-type: none"> AECOM costing 	<ul style="list-style-type: none"> All other elements costed by AECOM have been calculated using a compounding method, which contradicts their own report stating that “Specific Allowances”, “Special Provisions” and “Client Costs” should be based on a percentage of construction costs. For RD05b (Barossa Valley Side Roads), AECOM’s costing lacked clarity on the actual works included, while Metro’s suggested costing simply applied the stated percentages to AECOM’s construction cost in line with their methodology. Additionally, some on-cost items in AECOM’s estimates were applied incorrectly, such as DIT overhead charges for works not on DIT roads.
DHUD Costing (RD-07b, RD07c, RD-09)	<ul style="list-style-type: none"> New internal collector roads appear to have been costed by DHUD, as noted in AECOM’s reports, but no evidence of these costs has been provided, so they have not been assessed. The applied rates are excessive (over \$30,000 per metre for a collector road) so we have benchmarked these against current construction rates and included significant contingencies to estimate expected costs.

- Contingency application issues:** Contingencies have been applied incorrectly within the “Special Provisions” section, contrary to the methodology outlined in DIT EST 600. This misapplication affects the integrity of the total project cost.
- Poor presentation and documentation:** The cost estimates are difficult to interpret due to inconsistent project naming, illegible formatting, and lack of supporting documentation (e.g. drawings or aerial images).

Request:

Expand the transport interventions as provided in the attachments.

Disproportionate Charge and Beneficiaries - Kalbeeba

Metro Homes is being charged excessively for Kalbeeba, where 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.

While the proposed charge could be justified if the scope were expanded to include additional infrastructure requirements, under the current scope it is not reasonable.

The Scheme Outline includes some principles to guide the Infrastructure Scheme. Most notable to Metro Homes is equity:

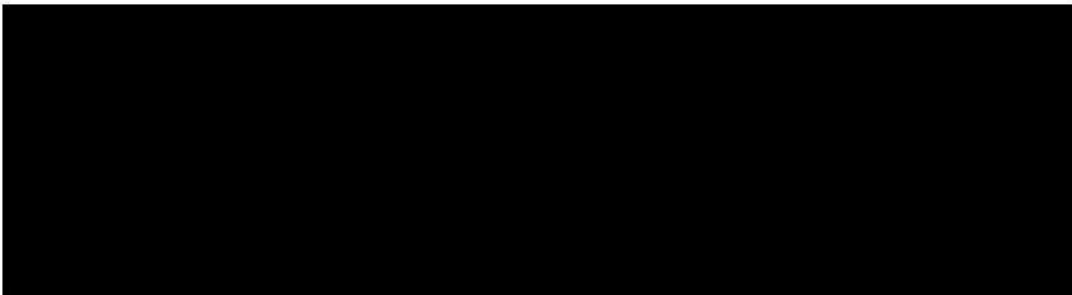
"Infrastructure should be properly scoped and costed, with the apportioned contribution relative to benefit."

"The Scheme will enable infrastructure requirements to be detailed and costed, with the apportioned contribution able to be shared between parties that benefit from the Code Amendment. The analysis underpinning the scheme will demonstrate that the Scheme is able to cover costs arising from development. These investigations will ensure that infrastructure costs will be shared proportionally to asset owners whose assets require upgrade."

Our immediate focus is on delivering the Kalbeeba site, which has the potential to bring over 300 dwellings to market within 3–4 years, subject to market response. Given its readiness for development, we believe the holding Overlay within the Planning and Design Code could be **removed without delay** and the charge removed from this land.

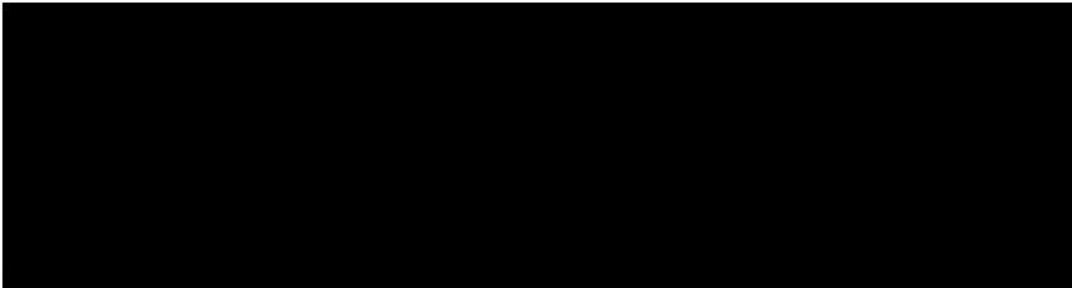
The Kalbeeba site should not contribute the full costs to the BIS for the following reasons:

- **Physical separation from CGA:** The site is divided from the Concordia Growth Area by a major road and rail corridor, meaning residents will not access or benefit from infrastructure to the north.



- **Existing road access:** The site is already accessible via Calton Road (south), eliminating dependency on Barossa Valley Way or Department of Infrastructure and Transport road infrastructure. There is no benefit in upgrades to Sunnydale Ave, or Cheek Avenue (or other roads North of the Barossa Valley Way).
- **No identified benefit:** Transport investigations to date do not identify Kalbeeba as a beneficiary of proposed upgrades, yet costs have been unfairly attributed to the site without corresponding benefit.

- **Early delivery potential:** With capacity to deliver over 300 dwellings within 3–4 years, the site is suitable for early release and should not be delayed or burdened by broader infrastructure cost-sharing.



Education Facilities

Metro Homes has significant concerns regarding the proposed allocation of 5.1 hectares for a State Primary School within the Concordia Scheme. This requirement is excessive, removes valuable land from the market, and limits flexibility for future educational needs. Our position is that a more balanced and evidence-based approach is required to ensure efficient land use, fair compensation, and community choice.

- **Land allocation:** 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.
- **Integration with social infrastructure:** This requirement 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.
- **Fair compensation:** 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.

Request:

Metro Homes maintains that land proposed to be acquired for education is excessive and unjustified and should be reduced to 3.5 hectares.

The land acquired for public purposes must be purchased at market rates, not based on the current zoning.

Misalignment of Infrastructure Staging and Requirements

The proposed timing for the construction of IN05 Collector Road as part of Phase 1 does not align with the anticipated staging of the development. Metro Homes' 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 (see Figure 1).

Metro Homes raises the following concerns:

- RD08 and IN05 will not be constructed in Phase 1 due to no SA Water supply in this location post 2035 (refer to Table 18: Phase 1 Infrastructure Projects).
- A new intersection should be included in the scheme (IN-Metro) to be 100% apportioned to the Concordia Growth Area, and a new road be included as Direct Delivery to replace RD08.
- IN05 should remain in the Scheme with 100% apportioned to the Concordia Growth Area but at a time post 2035. RD08 should also be post 2035.

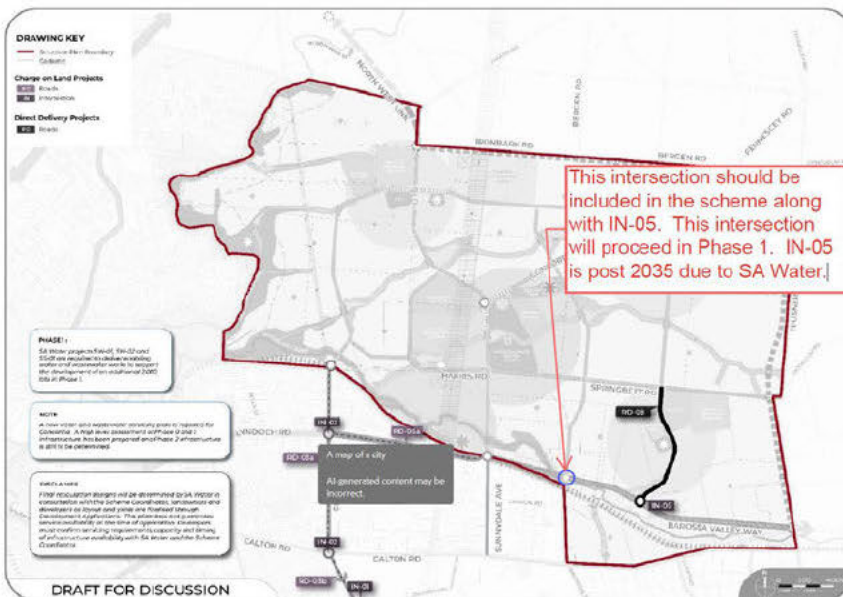


Figure 1 Staging misalignment

Basic Infrastructure Scheme Policies

We understand that the policies have evolved from the Standard Operating Provisions, which we provided feedback on 10 September 2025. These policies have been prepared to provide consistency in the operation of the scheme and assist with the interpretation of legislative steps.

Firstly, we think these Policies are guidelines as they are not statutory instruments as we interpret them.

Planning Referrals and Preliminary Agreements

Metro Homes notes the introduction of a new referral process within the Infrastructure Coordination Overlay of the Planning and Design Code.

This Overlay includes provisions requiring infrastructure to be delivered in accordance with the relevant Concept Plan and references the applicable Infrastructure Scheme. A referral is now required to the Scheme Coordinator for the following purposes:

To provide direction to the relevant authority in relation to:

- a) whether development is consistent with the provision of infrastructure associated with the relevant infrastructure delivery scheme*
- b) whether development compromises or conflicts with the provision of infrastructure provided for under an infrastructure delivery scheme*
- c) infrastructure capacity and servicing associated with a development within the scheme area*
- d) whether contributions or other conditions are required in accordance with the relevant infrastructure delivery scheme.*

The referral requirements are to be read with the Draft Basic Infrastructure Scheme Referrals and Preliminary Agreements Policy, which outlines the Scheme Coordinator's role in managing development referrals and preliminary agreements under sections 122 and 123 of the PDI Act.

Metro Homes raises the following concerns:

- **Scope of referral:** 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.
- **Impact on approvals:** 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.

- **Referral timeframe:** 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.
- **Monitoring and review:** 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.

Works-in-kind Agreements

Metro Homes acknowledges the intent of the Works-in-Kind Agreements Policy, which provides a framework for delivering infrastructure through in-kind contributions as an alternative to monetary payments.

Metro Homes raises the following concerns/questions:

- **Integration with the scheme:** 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.
- **Reimbursement and offsets:** 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.
- **Clause 12.1 – Interpretation needed:** The meaning and implications of Clause 12.1 are unclear. We request further explanation to illustrate its application.
- **Step 3 – Formal Agreement (Page 7):** 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.
- **Compensation and repayment terms:** Upon acceptance of a Works-in-Kind application or agreement, it would be preferable for the Scheme Coordinator to also confirm:
 - The method of compensation in relation to the Charge on Land.
 - The repayment terms, as outlined under Clause 12.5.

Works Program

Metro Homes understands that this policy outlines the considerations and procedures for scheduling Scheme Infrastructure Projects under a Works Program approved as part of a Basic Infrastructure Scheme.

We support the intent of the policy to guide infrastructure delivery in a coordinated and transparent manner. In relation to out-of-sequence works, we recommend that an additional principle be included under Clause 5.3 to ensure broader impacts are considered:

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.

This addition would help ensure that flexibility in delivery does not come at the expense of other stakeholders or the integrity of the broader Works Program.

Reviews and Variations Policy

Metro Homes appreciates the intent of the Reviews and Variations Policy to enable periodic review and refinement of the Basic Infrastructure Scheme. We acknowledge that the Minister may vary the outline of a Scheme, with the process for doing so set out under the Planning, Development and Infrastructure Act 2016.

Key issues:

- **Approval of variations:** 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 “*significant*”. This enhances the transparency and enables consistency in decision-making.
- **Minor variations:** 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.
- **Clause 4.4 – Review principles:** 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. For example, the inclusion of “*Value for Money*” introduces ambiguity, as the Act limits the charge to the recovery of reasonable capital costs associated with the Basic Infrastructure Scheme. We recommend that the policy be revised to ensure full alignment with the legislative framework.

Ongoing Legislative Changes


- We note that the concept of a primary infrastructure scheme has now been introduced into the *Planning, Development and Infrastructure Act 2016*. The Act has also been altered to enable Deeds to essentially be dissolved following the introduction of a Scheme.
- Under the Act, *primary infrastructure* includes basic infrastructure, open space (such as parks, playgrounds, nature reserves, and pedestrian/cycling paths), local community sporting or recreation facilities, and multi-use community buildings such as libraries.
- Given this expanded definition, we seek confirmation as to whether the Social Infrastructure Deed currently under negotiation with Barossa Council is intended to be superseded by these new provisions.
- While we are assuming that such a transition cannot occur through a variation to the current scheme, and would require a new process, we are uncertain about what the Government's intent is in relation to Concordia.

Conclusion

Metro Homes supports the Funding Plan and proposed charge, provided the expanded scope from our funding model is included and SA Water charges for Kalbeeba are amended. The current limited scope risks creating an inflated charge that does not reflect project needs. Including the expanded scope makes the charge fair and transparent, ensuring infrastructure delivery supports feasibility while maximizing value without unnecessary cost escalation.

Our recommendation is that the following occur:

- The transport infrastructure scope be revised to include the additional scope identified, while maintaining the charge.

- 
- The Scheme be clear that wastewater solutions can be delivered through a private provider.
 - The land acquired for education is should be reduced to 3.5 hectares.
 - The land acquired for public purposes must be purchased at market rates, not based on the current zoning.
 - 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
- Design development of infrastructure interventions
- Revised costings of these interventions

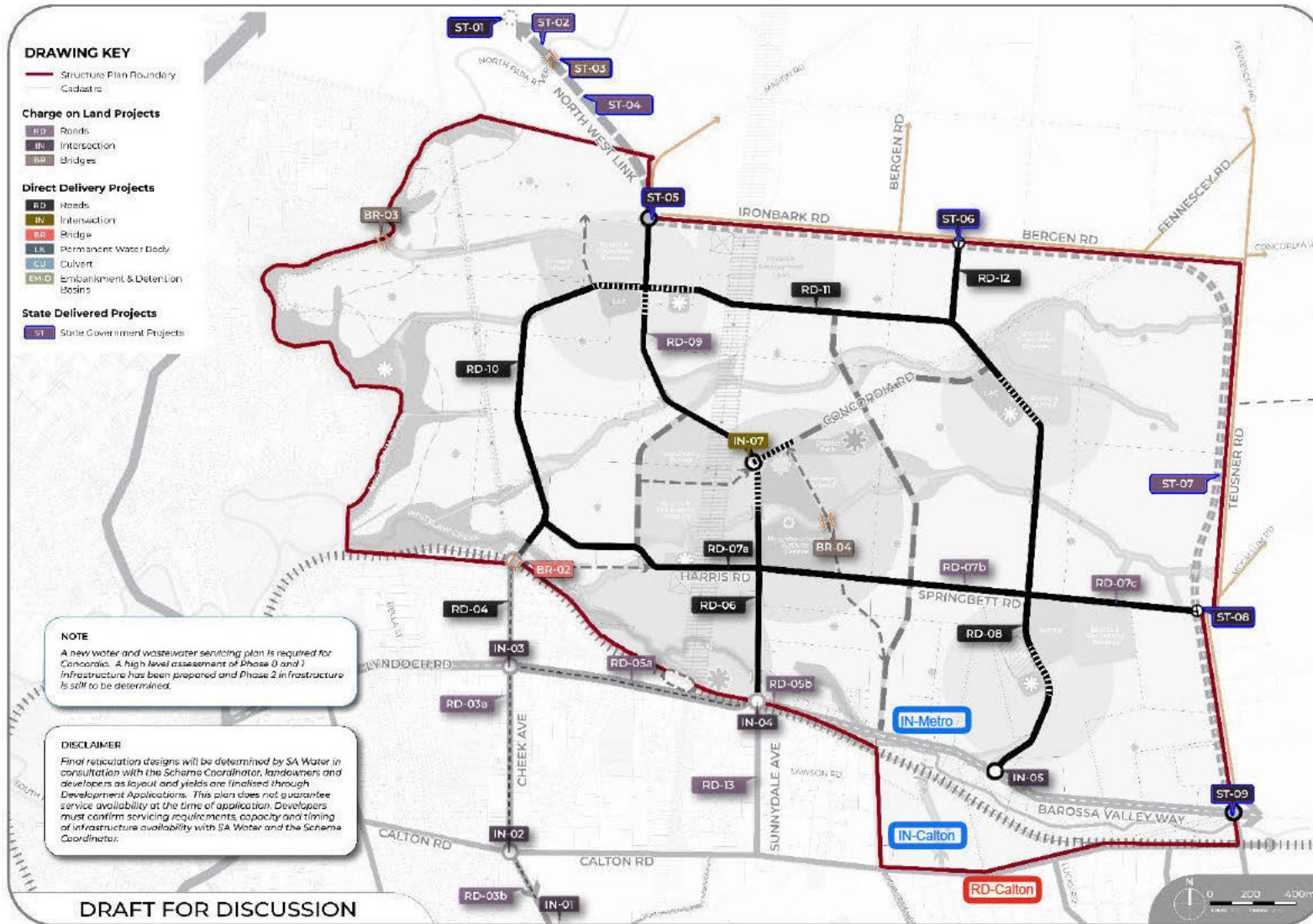
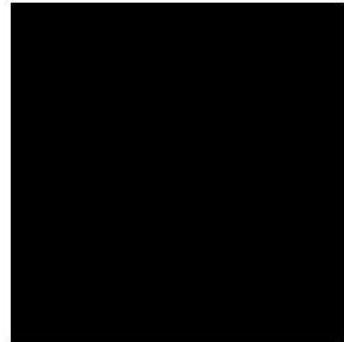
We thank you for the opportunity to work with you on finalising the scheme. If you would like any additional information, please contact me on [REDACTED] or [REDACTED]

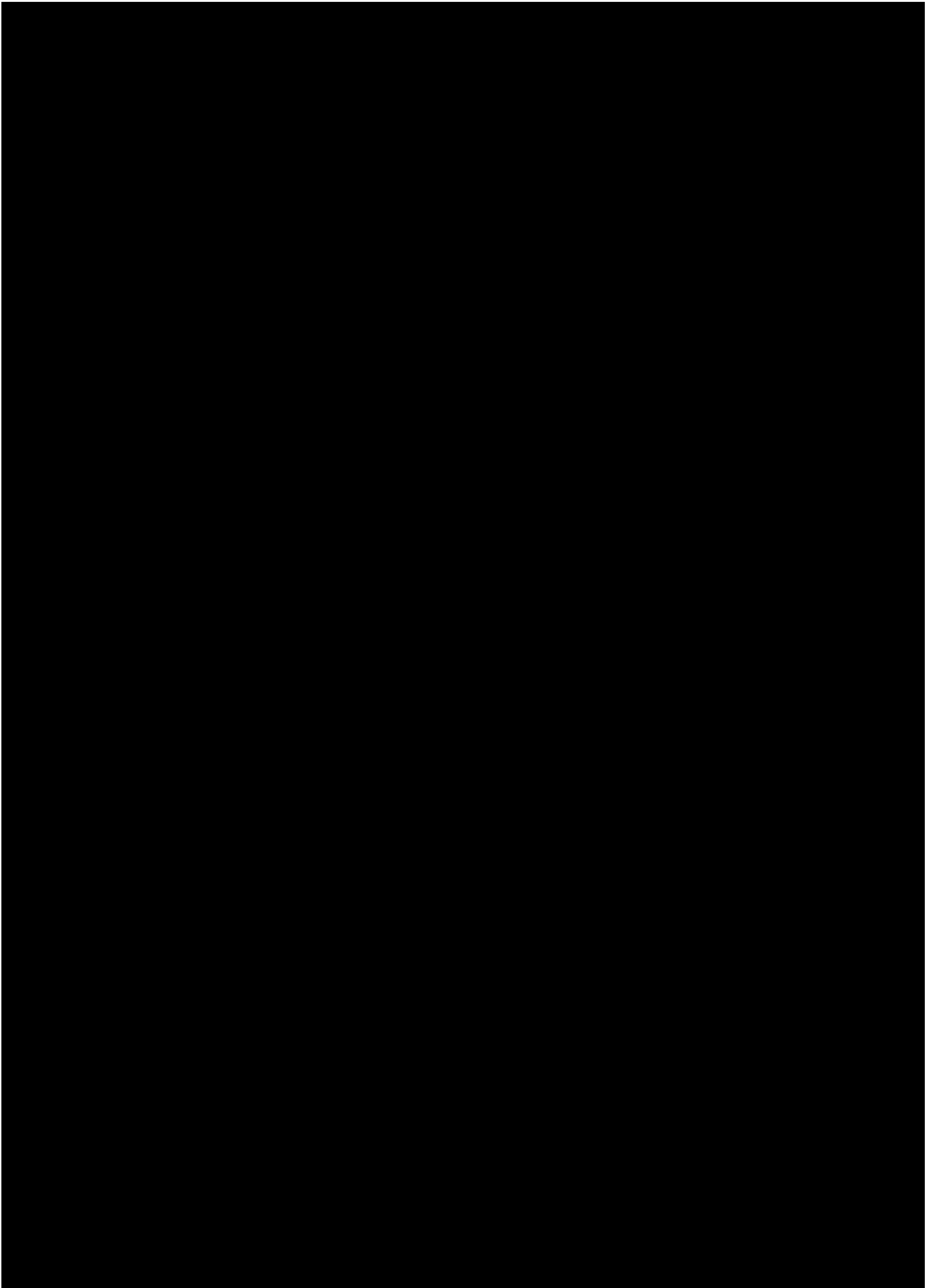
Yours sincerely



Anita Allen
Associate Director

Figure 9: Proposed Concordia Basic Infrastructure Scheme Projects SCHEME PROPOSAL





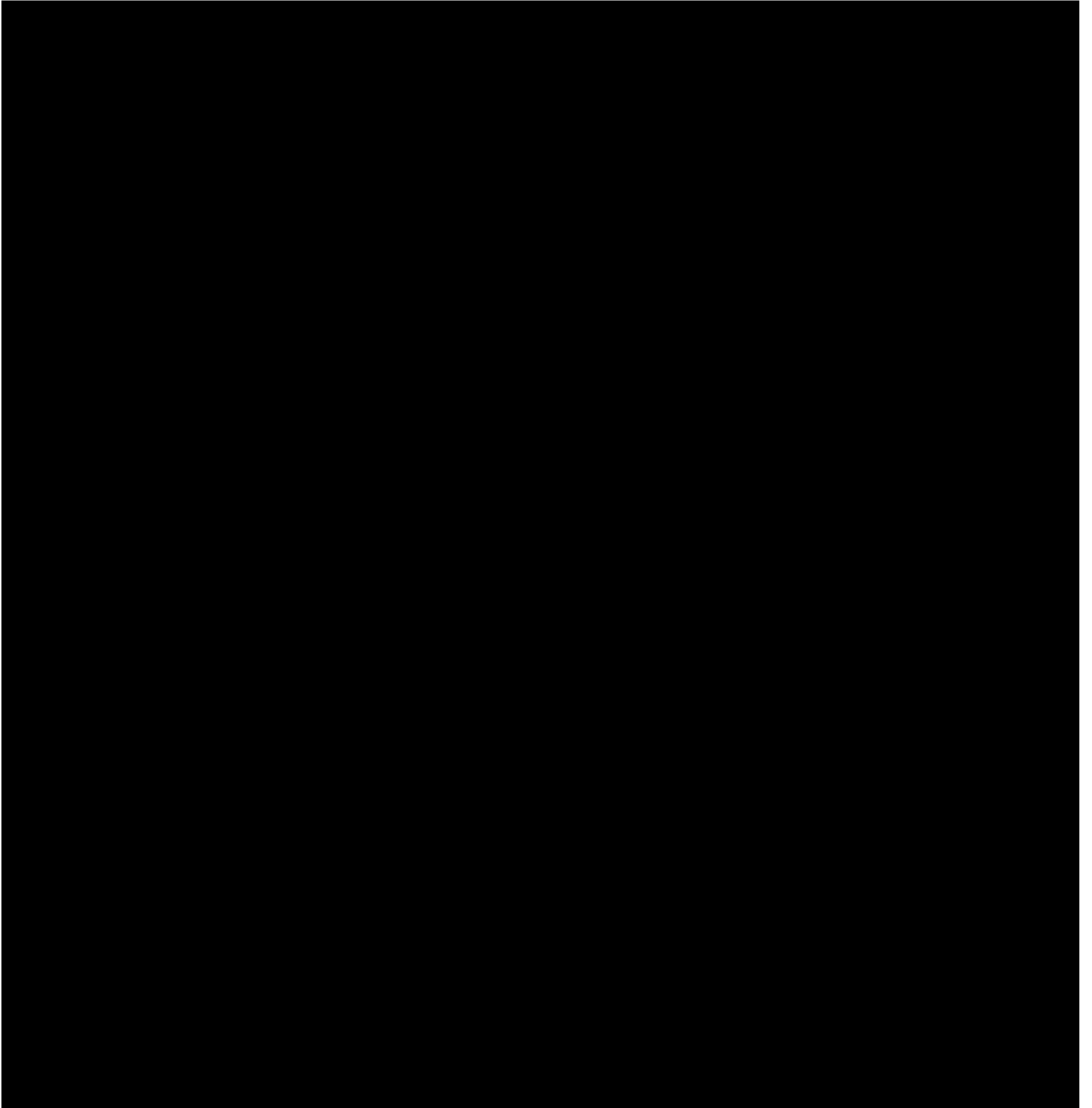
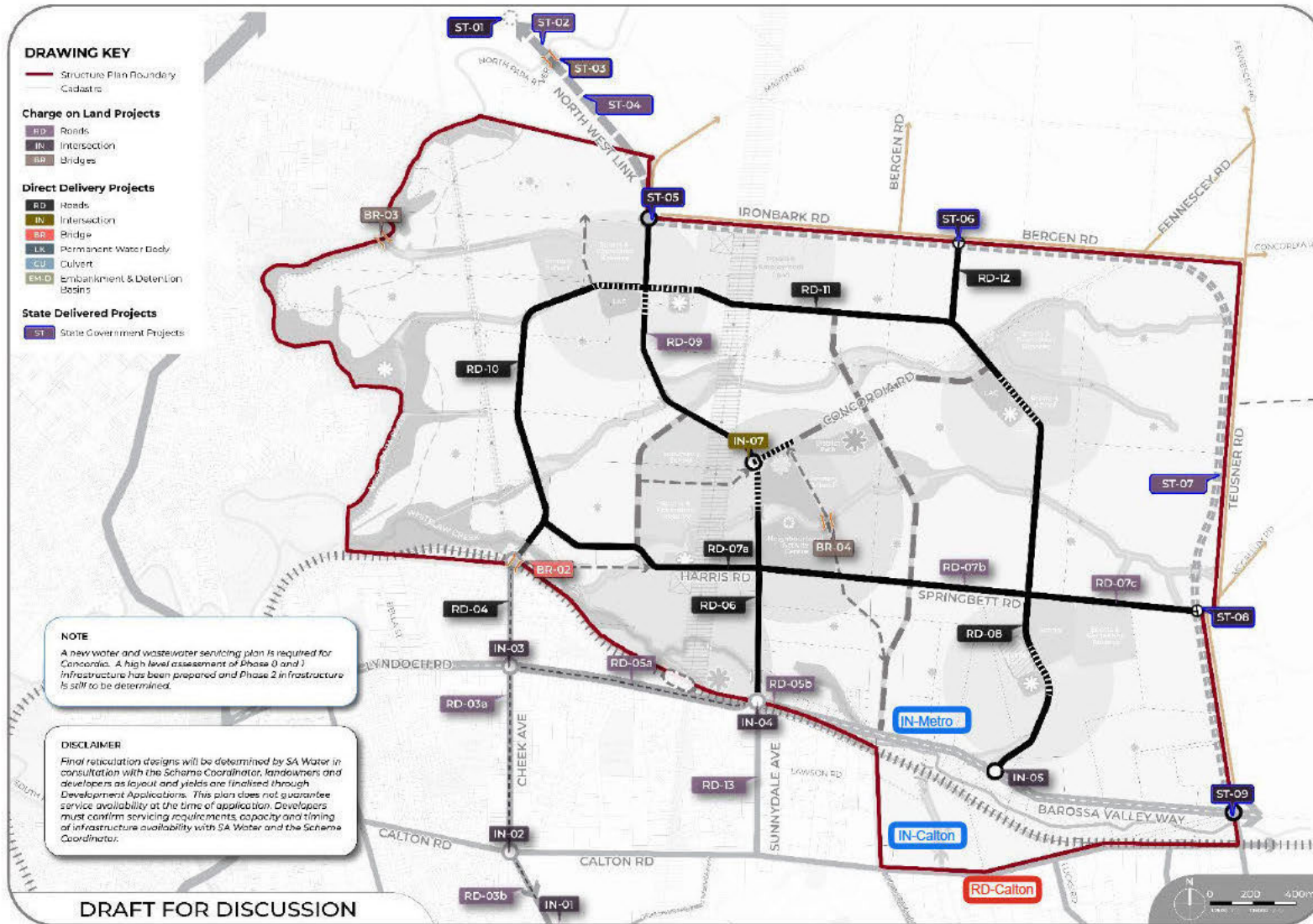
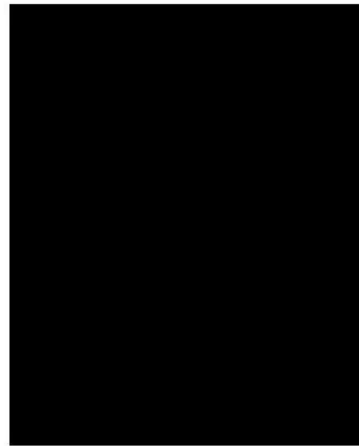
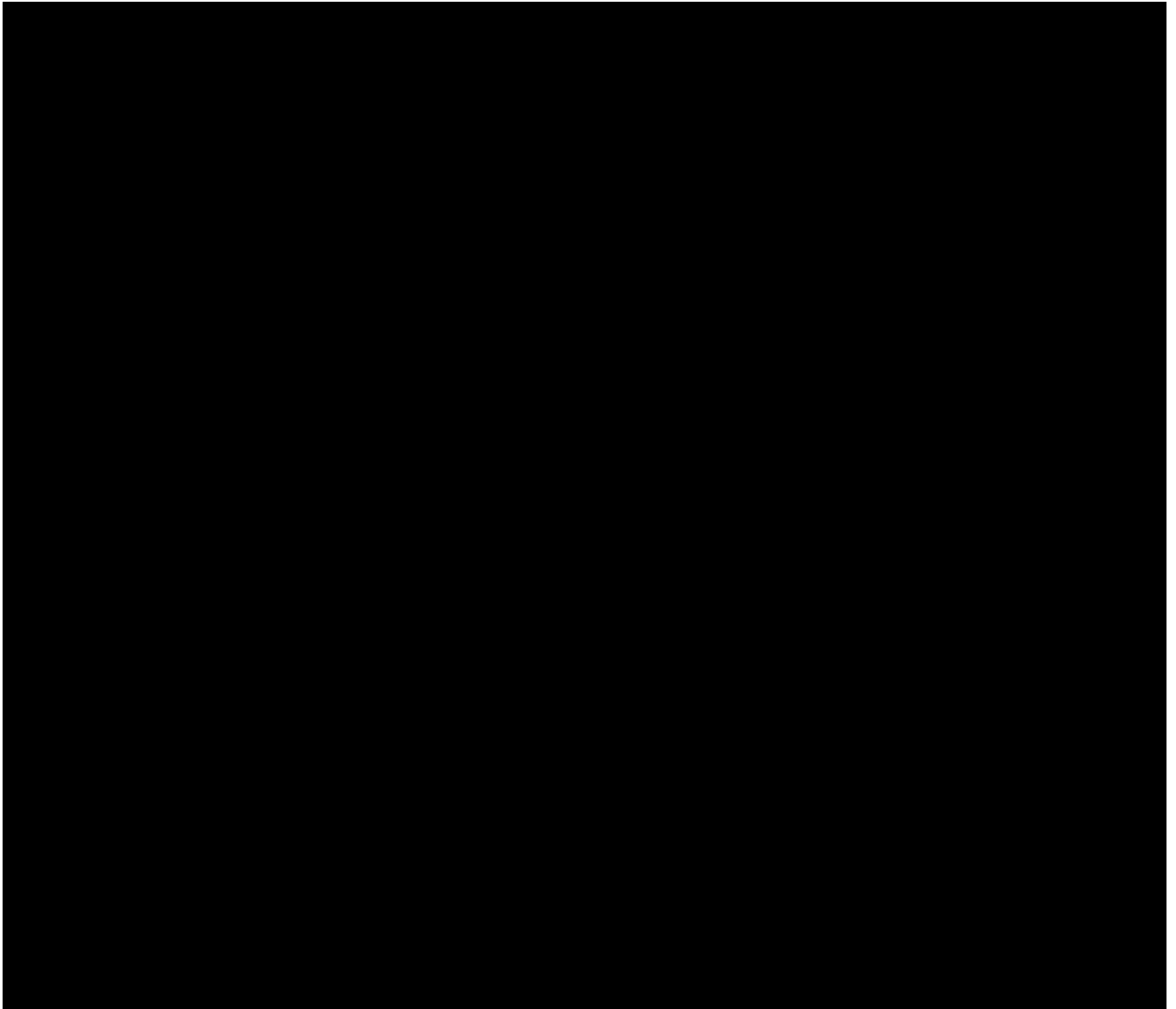


Figure 9: Proposed Concordia Basic Infrastructure Scheme Projects CASHFLOW PROPOSAL





Ref: 23206|BNW

25 November 2025

Mr Warwick Mittiga
Concordia
24 St Helena Place
ADELAIDE SA 5000

Dear Warwick,

CONCORDIA INFRASTRUCTURE FUNDING PLAN TRANSPORT INVESTIGATIONS REVIEW

I refer to our recent discussions regarding the Concordia Infrastructure Funding Plan and associated transport interventions. As requested, I have reviewed the Funding Plan's Consultation Draft as well as supporting information and documents. This letter summarises the key findings and queries identified by my review.

In preparing this letter, I have been provided with and have reviewed the following documents:

- AECOM "*Concordia Transport Infrastructure Strategy*" (dated 13 February 2025);
- AECOM "*Cheek Avenue Corridor Study*" (dated 17 April 2025);
- AECOM "*Sunnydale Avenue Traffic Assessment*" (dated 25 September 2025);
- AECOM "*Concordia Growth Area – Order of Magnitude Estimate Report*" (dated 30 September 2025);
- Slattery "*Concordia Growth Area – Estimate Peer Review*" (dated 8 October 2025);
- AECOM "*Sunnydale Avenue Upgrade Investigation*" (dated 8 October 2025);
- AECOM "*Transport Infrastructure Strategy – Order of Magnitude Cost Estimate*" (dated 9 October 2025);
- RLB "*Gawler East Traffic Interventions Concept Design Estimate*" (dated 9 October 2025);
- AECOM "*Addendum to Concordia Transport Infrastructure Strategy*" (dated 13 October 2025);

- Mesh “*Concordia Infrastructure Funding Plan – Consultation Draft*” (dated 15 October 2025); and
- Department for Housing and Urban Development (DHUD) “*Concordia Infrastructure Scheme Cheek Avenue Projects*” (dated 3 November 2025).

As part of my review, I have considered the various road and intersection upgrades identified for the development of the Concordia Growth Area (CGA) and the associated transport analysis and costings provided. I have focussed on the *Direct Delivery* and *Charge on Land* infrastructure as detailed in the Mesh plan. It should be noted that I do not have qualifications nor expertise in cost analysis and that comments provided in respect to costs relate to high-level comparisons between the scenarios provided.

1. ROADS

1.1 RD-03A CHEEK AVENUE (BAROSSA VALLEY WAY-CALTON ROAD)

The difference in upgrade for Cheek Avenue (between Barossa Valley Way and Calton Road) relates to the introduction of a central median. In respect to the general cross section, this is considered reasonable given the additional volumes anticipated to be distributed to Cheek Avenue. I highlight, however, that the warrant for channelised right turns may have been met without Concordia volumes. In particular, regardless of Concordia, a channelised right turn treatment at the intersection of Cheek Avenue with Hurst Road may have been warranted with the increased volumes forecast for Gawler East related development (particularly given Hurst Road services a local centre and the Gawler East Primary School).

In respect to the costings provided for this section of Cheek Avenue, it appears that there is little difference in the quantities adopted for comparison between the Gawler East costings (page 41 of Appendix F) and those for the Concordia costings (page 71 of Appendix F).

Most notably, the additional width associated with the painted median treatment (requiring in the order of 2,845 m² additional carriageway area assuming 862 m length with 3.3 m median width) does not appear to be included.

The only notable differences in quantities relate to:

- 754 Backfill behind kerb and gutter – [REDACTED]
- 856 and 939 – Asphalt laying crew mobilisation and night shift – [REDACTED] and [REDACTED]
- 860 verge landscaping pots – an additional 4,076 units but no rate was applied to the Gawler East units. [REDACTED]. It [REDACTED].

is pertinent to note that with a wider carriageway (painted median) the extent of landscaping within verges would likely decrease for the Concordia scenario.

Other differences resulting in the cost differential (noting no other quantity differences) relate to higher rates being applied to the Concordia costings.

RD-03A KEY COMMENT – Review quantities and rates applied to Gawler East and Concordia costings to ensure consistent basis for comparison of apportionment to CGA.

1.2 RD-03B MCMILLAN PARADE (CALTON ROAD-SCHOMBURGK DRIVE)

As with Cheek Avenue (RD-03A), the difference in upgrade associated with McMillan Parade to accommodate Concordia traffic compared to the original Gawler East concept primarily relates to the addition of a central painted median within the road’s cross section. While this is reasonable given the additional volumes distributed to McMillan Parade by the development Concordia, it is important to note that (other than the painted median and associated widening implications), all other components of McMillan Parade would have been required to have been delivered as part of the Gawler East Deed (i.e. as part of the Springwood development).

The approach to costings between the Gawler East and Concordia upgrades differs to that adopted for RD-03A with direct comparison more difficult. However, based on review of the costings, there appear to be additional cost items assigned to the Concordia costings that may be beyond any relationship to the painted median component, namely:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Road. Specifically, page 54 of the Concordia Transport Infrastructure Strategy identifies a distribution of 10,600 vpd to Cheek Avenue and Concordia Road combined.

The earlier reports note concern regarding modelling discrepancies, but these do not seem to have been addressed in the subsequent updates/addendums. There had been discussions regarding anticipated updated DIT modelling, however, to my knowledge this has not been completed (or at least not provided). As I have previously raised, I consider that Concordia Road volumes will likely be higher than identified in the modelling and that (at least the northern section of) Cheek Avenue may accommodate even lesser increases than suggested above.

RD-04 KEY COMMENT – Ensure future volumes adopted for the assessment of Cheek Avenue interventions are appropriate (and do not include combined Concordia Road volumes).

If the lower assignment of 8,000 vpd to solely Cheek Avenue (identified by the original modelling) was adopted, the total future RD-04 volume would be 12,000 vpd and the 2,800 vpd associated with Gawler East/Springwood would equate to 23.3%. This further strengthens the argument that an offset against the CGA contributions to RD-03B McMillan Parade and RD-03A Cheek Avenue should be considered.

RD-04 KEY COMMENT – Consider offset to RD-03A and RD-03B contribution given benefit RD-04 provides to Gawler East/Springwood and the broader community.

1.4 RD-05A BAROSSA VALLEY WAY (CHEEK AVENUE-CONCORDIA ROAD)

The Funding Plan identifies general upgrade of Barossa Valley Way comprising kerbing, side street intersection treatments (including likely turn lanes) and retention of an 80 km/h speed limit. The extent of upgrades are considered appropriate for the future volumes forecast.

I understand that others have queried the level of cost assigned to RD-05A. The specifics of the costings are outside of my expertise and I defer to others to make comment on this aspect of the Funding Plan.

I note that a trigger of 300 dwellings has been identified for the RD-05A upgrade. This is relatively early in the CGA development timeframe. Such a level of dwellings would generate up to 2,400 vpd based on the conservative rate of 8 trips per dwelling (lesser rates have been identified in the broader vicinity). Additionally, not all movements would be distributed via the subject section of Barossa Valley Way (even if connection via Cheek Avenue/Harris Road is not formed by this point in time). Noting the anticipated development staging it is likely that a reasonable proportion of such volumes would be distributed via Sunnydale Avenue (at least in the interim). Noting that a number of interventions have been assigned to a 300 dwelling trigger, there may be opportunity for

review and consideration of staggered triggers to 'spread the load' in respect to funding and delivery of the interventions.

RD-05A KEY COMMENT – Review development trigger for RD-05A upgrade as well as others and consider opportunity to stagger delivery and funding.

1.5 RD-05B BAROSSA VALLEY WAY (SIDE ROADS)

Based on the information provided to CIRQA, it appears that there limited detail in respect to the intended upgrades associated with RD-05B. The works are described as *"Upgrade to side roads associated with Concordia Road intersection and others"*. The various figures identify the location of RD-05B as being immediately east of the Concordia Road/Barossa Valley Way intersection. Noting that the trigger associated with RD-05B refers to *"..when required for access via adjoining development..."* it would appear that these works relate to locations where additional side street intersections either exist or can be formed with connection to/from the Concordia land. This suggests that this may relate to the intersection of Wheatsheaf Avenue with Barossa Valley Way (as Wheatsheaf Avenue could be extended into the Concordia land) as well as the portion of 23 Wheatsheaf Avenue between 281 and 287 Barossa Valley Way (which could accommodate a future road reserve).

I assume that the works likely relate to upgrades such as channelised (sheltered) right turn lanes (and possibly left turn lanes). [REDACTED]

RD-05B KEY COMMENT – Confirm extent of upgrades associated with the RD-05B item(s) and the appropriateness of cost allocation.

1.6 RD-06 CONCORDIA ROAD (BAROSSA VALLEY WAY-HARRIS ROAD)

As noted above, I have previously raised concern that the assignment of Concordia traffic volumes via Concordia Road (within the models detailed by AECOM) appears low. The *"Concordia Transport Infrastructure Strategy"* notes that *"...Cheek Avenue ... is attracting a much higher traffic volume compared to Concordia Road... despite Concordia Road providing a more direct access to Concordia"*. The Strategy report confirms that further model refinement is required to determine a more realistic distribution (the Addendum does not address this matter).

Furthermore, noting the following factors, the 2,400 vpd future forecast identified for Concordia Road appears low:

- Concordia Road will ultimately form part of a direct link between the Sturt Highway and Barossa Valley Way (I acknowledge that the bypass road will likely have a higher speed limit and lower travel times for drivers travelling to/from the Barossa via the

bypass. However, RD-06 and RD-09 will provide an attractive route for other movements associated with a significant portion of Concordia but also land to the south (Gawler East/Springwood);

- Concordia Road will provide a key connection to/from the Neighbourhood Activity Centre, schools and sport/recreation areas as well as other non-residential uses with potentially significant traffic generation (and a more direct connection between Barossa Valley Way and these destinations than Cheek Avenue/Harris Road or Springgett Road); and
- Concordia Road is intended to be signalised at its southern intersection with Barossa Valley Way (and potentially Sunnydale Drive) which will further accommodate safe and convenient access.

RD-06 KEY COMMENT – Ensure that infrastructure requirements are based on realistic traffic volume forecasts for Concordia Road (and that any commensurate reduction in the distribution via Cheek Avenue is also considered).

The Funding Plan identifies that RD-06 be funded by a *Direct Delivery* approach. In comparison, Springbett Road (RD-07B and RD-07C) is proposed as *Charge on Land Infrastructure*.

The Mesh plan notes that the *Charge on Land* inclusion “...recognises the function of these roads in the interim period until the bypass road is delivered.”. Additionally, Table 5 of the Mesh plan notes recommends that the funding mechanism for “Key Collector Internal roads” (my emphasis) be via *Charge on Land*.

In my view, RD-06 (Concordia Road) forms a Key Internal Collector Road and, of greater strategic importance within the road network than Springbett Road. This is supported by the factors detailed above in respect to the higher traffic volume anticipated for Concordia Road. Furthermore, in the event that the North-West (Arterial) Link to the Highway is delivered prior to the completion of the Bypass Road to Barossa Valley Way, RD-06 will also provide a more strategic link than Springbett Road. In my view, the full north-south link comprising RD-06 and RD-09 should be included as *Charge on Land* infrastructure.

RD-06 KEY COMMENT – Review funding approach to RD-06 with *Charge on Land* considered more reflective of its strategic importance within the proposed network.

1.7 RD-07A HARRIS ROAD (SPRINGBETT ROAD-NEW COLLECTOR)

The general form and function proposed for Harris Road is considered appropriate. However, noting the relatively significant proportion of traffic assigned to Cheek Avenue by the AECOM assessment, it could be argued that Harris Road will form a Key Collector

Road within the Growth Area (with potential for designation as *Charge on Land* infrastructure).

RD-07A KEY COMMENT – Review funding approach to RD-07A with *Charge on Land* considered more reflective of its strategic importance within the proposed network.

1.8 RD-07B SPRINGBETT ROAD (HARRIS ROAD-INTERNAL COLLECTOR)

RD-7B has been included within the Scheme and assigned as *Charge on Land* infrastructure. Such a designation is considered appropriate given this segment of road will effectively form part of the internal collector loop (formed with Harris Road, RD-10, RD-11 and RD-12).

RD-07B KEY COMMENT – Retain RD-07B within the Scheme (*Charge on Land*).

1.9 RD-07C SPRINGBETT ROAD (INTERNAL COLLECTOR-BYPASS ROAD)

RD-07C has been assigned as *Charge on Land* infrastructure. As noted above, the Mesh plan notes that this relates to the function of this road until the bypass road is delivered. The Mesh plan notes that the AECOM assessment has designated this road as part of a 'key route', however, such designation is not clearly noted in the AECOM reports provided. Accordingly, it is not clear how the function of RD-07C differs from other internal collector roads (such as RD-7A, RD-10, RD-11 and RD-12) and, arguably, will form a lesser strategic role than the collector loop roads. Such a designation would be more logical if the Kalbeeba Road portion of the bypass road (between Springbett Road and Barossa Valley Way) was to be upgraded as an earlier connection prior to completion of the full bypass. Without such a strategic connection, RD-07C would appear to function as general (not key) collector roads serving abutting development.

In addition to the above, Springbett Road comprises an existing road reserve (i.e. is not located within privately owned land/development parcel). I understand that portions of it also have different ownership on the northern and southern side (Metro and Teusner). The Funding Plan identifies delivery responsibility for Springbett Road as being assigned to 'Developers'. However, the mechanism by which delivery of such sections of road is delivered is unclear particularly if staging of development of opposite parcels differs.

RD-07C KEY COMMENTS – Review designation of RD-07C as 'Key' collector roads (and associated *Charge on Land* assignment). Ensure clarity is provided in respect to delivery responsibilities/mechanism given Springbett Road is within a public road reserve with different land owners either side.

1.10 RD-08 NEW CONNECTOR (BAROSSA VALLEY WAY-SPRINGBETT ROAD)

The proposed treatment of RD-08 (North-South Collector) is considered appropriate as is the designation of this road as a *Developer Delivery* infrastructure.

There is conflicting information in the Funding Plan in respect to the apportionment to CGA as Table 3 notes 100% to CGA whereas Table 11 indicates 0% (I assume Table 3 is correct, however, for clarity this should be confirmed).

RD-08 KEY COMMENT – Confirm CGA apportionment.

1.11 RD-09 NORTH-SOUTH COLLECTOR (CONCORDIA ROAD-BYPASS ROAD)

The proposed treatment of RD-09 (North-South Collector) is considered appropriate as is the designation of this road as a Key Collector Road and *Charge on Land* infrastructure.

1.12 RD-10, RD-11 AND RD-12 COLLECTOR LOOP

The general form and function of the collector road loop (comprising RD-10, RD-11 and RD-12) is considered appropriate given the anticipated road network and traffic volumes. Developer delivery on the collector loop is also generally considered appropriate. However, consideration should be given to the possibility of future break-up of land holdings resulting in a different ownership mix of the Growth Area (i.e. there are no guarantees that the current ownership arrangements will be maintained through Phases 0, 1 and 2). Should this occur, there is potential that the developer-driven delivery of the collector loop could result in a fragmented implementation (under interim scenarios) as has occurred with Heysen Boulevard in Mount Barker. Given the strategic importance of the collector loop, it would be reasonable to consider that it will form a Key Collector Road within the Growth Area with potential for designation as *Charge on Land* infrastructure. This would assist with addressing the above concern.

RD-10, RD-11 & RD-12 KEY COMMENTS – Ensure funding mechanisms consider different ownership structures and avoid fragmented delivery of the collector loop. Review funding approach to RD-10, RD-11 and RD-12 with *Charge on Land* considered more reflective of the strategic importance of these segments within the proposed network.

1.13 RD-13 SUNNYDALE AVENUE (BAROSSA VALLEY WAY-CALTON ROAD)

As I have previously noted, I remain of the opinion that there will be a reasonable (and likely high) level of use of Sunnydale Avenue unless significant intervention (such as a road closure) is undertaken. Noting the directness of the connection between Concordia and Springwood (notably the existing activity centre), Sunnydale Avenue will present an attractive route for drivers associated with Concordia, Springwood and surrounding existing residential areas. Furthermore, the Funding Plan notes the inclusion of Sunnydale

Avenue as part of the signalised treatment of Barossa Valley Way/Concordia Road (which will further increase the convenience of this route). These factors have been acknowledged by AECOM (particularly in respect to an interim arrangement before the Cheek Avenue connections are formed). Additionally, until such time that the Neighbourhood Activity Centre is developed within Concordia, the Springwood Activity Centre will provide the closest retail services for the initial stages of Concordia. In the longer term, there will also be destinations within Concordia that would likely attract traffic from Springwood residents with Sunnydale Avenue providing the most direct route.

The AECOM *"Sunnydale Avenue Upgrade Investigation"* notes that the previous Springwood investigations identified that Sunnydale Avenue would accommodate a future traffic volume of 3,000 vpd (excluding allowance for Concordia volumes). Such volumes will be twice the level typically associated with local roads (1,500 vpd). Without significant intervention (closure), there will be further distribution of Concordia related movements via Sunnydale Avenue. While the additional upgrade requirements are acknowledged, I remain of the opinion that Local Area Traffic Management treatments (other than closure) will not be effective in reducing traffic volumes to a level commensurate with a local road. It is therefore highly likely that there will be notable amenity impacts for residents of Sunnydale Avenue (and connecting side streets) and potentially safety impacts. While a road closure could be considered, this would also have broader impacts on accessibility and is not considered a desirable outcome (particularly in respect to the 'share the load' approach to distribution of traffic).

I note AECOM's commentary in respect to impacts on Mullamar Way and the intersection with Schomburgk Drive and shopping centre access point. However, the comments are largely anecdotal and have not been demonstrated/confirmed with modelling.

Noting the above comments, I remain of the opinion that Sunnydale Avenue will (and should) form a key road within the strategic network servicing the surrounding existing residential areas, Gawler East/Springwood and Concordia. Consideration should be given to the inclusion of an upgrade to Sunnydale Avenue (and associated intersections) as part of the Scheme.

RD-13 KEY COMMENTS – Reconsider the approach to Sunnydale Avenue and its potential upgrade (including associated intersections) with these works desirably included in the Concordia Infrastructure Scheme.

2. INTERSECTIONS

2.1 IN-01 MCMILLAN PARADE/SCHOMBURK DRIVE

The provision of a roundabout at the intersection of McMillan Parade and Schomburgk Drive was identified as part of the Gawler East Deed investigations. It appears, however, that it was not ultimately included in the Deed works as it was internal to the Springwood

development and formed part of the developer delivery road network for Springwood. DHUD has provided a screenshot of the original roundabout design from the Gawler East Link Road review. Additionally, AECOM has prepared a revised concept for the more recent Concordia investigations. In order to consider the differences between the two designs, the following dot points provide a comparison of key roundabout design criteria (based on the Austroads' "Guide to Road Design – Part 4B: Roundabouts"). While I acknowledge that this is based on the current Guide, to my knowledge, there have not been notable changes (if any) in the key design criteria since the preparation of the original Gawler East Link Road concepts.

- **Original Gawler East Link Road Design**

- **Approach Speed** – Unclear what speed was adopted. Central island radius achieves the 'Minimum' criteria for 60 km/h approach speed. **Compliance – Achieved/Appropriate**
- **Central Island Radius** – Approximately 10.0 m which is compliant the 'Minimum' criteria **Compliance – Achieved (but Minimum)**
- **Circulating Width** – Approximately 8.0 m which achieves the criteria for accommodation of Semi-Trailers. **Compliance – Achieved/Appropriate**
- **Vehicle Turn Paths** – Unclear what design vehicle utilised – Semi-Trailer (general access vehicle and, at minimum, the relevant check vehicle) movements appear to conflict kerbing based on preliminary review of some turns. **Compliance – Not Achieved**
- **Sight Distance** – Unclear given property boundary arrangements not finalised within base plan. **Compliance – Unclear**

- **Current Concordia (AECOM) Design**

- **Approach Speed** – 60 km/h **Compliance – Achieved/Appropriate**
- **Central Island Radius** – 12.0 m ('Desirable' criteria) **Compliance – Achieved/Appropriate**
- **Circulating Width** – Approximately 5.9 m (as per 12.5 m Design Vehicle) **Compliance – Achieved/Appropriate**
- **Vehicle Turn Paths** – 12.5 m Rigid for Design Vehicle and 19 m Semi-Trailer for Check Vehicle **Compliance – Achieved/Appropriate**
- **Sight Distance** – Not assessed in detail but likely achievable with current design once boundary impacts confirmed. **Compliance – Likely Achieved/Appropriate**

Most notably, the total dimension of the overall circular form of the roundabouts (2x carriageway width plus central island diameter) is very similar for the two concepts. Specifically, for the GELR roundabout concept a total width for the circular extents of approximately 36 m was identified, whereas for the AECOM concept, this dimension is only 35.8 m. This actually suggests the overall roundabout would be slightly smaller with

the more recent AECOM (Concordia) design. While there are some differences in the design of the approaches, it appears that the overall extent of the roundabout proposed is not notably different for the Concordia review than that previously identified for the Gawler East investigations. Additionally, with a larger central island for the AECOM concept, there is less full depth pavement associated with the roundabout's carriageway which may achieve some further cost efficiencies. On this basis, it is unclear how the \$1.9 m cost differential between the GELR concept and the current AECOM (Concordia) concept has been derived.

Regardless of the cost differential, a compliant roundabout was required at this location regardless of the development of Concordia. Based on the two concepts, there is not notable difference between the extent of works required to deliver the roundabout (regardless of the additional volumes distributed).

Given the IN-01 is also located within the Springwood development parcel, it is unclear what mechanisms will be in place to ensure it can be delivered when required to support the CGA (particularly noting the 300 dwelling trigger). Given the upgrade is reliant on both Springwood land and contribution from the Springwood developer, the Infrastructure Scheme needs to ensure its delivery cannot be stalled.

IN-01 KEY COMMENT – Delivery of the IN-01 roundabout should be excluded from the Concordia Infrastructure Scheme. If retained in the Scheme, further justification for the cost differential should be provided given little difference in extent of works between the original and current concept designs.

2.2 IN-02 CALTON ROAD/CHEEK AVENUE

The cost differential identified for IN-02 appears to largely relate to the differences between the concept design prepared for the Gawler East Deed and the more recent AECOM design for the Concordia investigations. I am of the opinion that the original Gawler East concept design was flawed and not based on a feasible design. The identification of cost differentials on the basis of the flawed original concept skews the level of cost attribution to CGA.

To illustrate this issue, the following dot points provide a comparison between the original Gawler East concept and the more recent (conformant) AECOM design.

- **Original Gawler East Design**

- **Approach Speed** – Unclear what speed was adopted. Central island radius is less than 'Desirable' criteria for less than 40 km/h approach speed but would have met 'Minimum' criteria for 50 km/h approach speed. **Compliance – Questionable**
- **Central Island Radius** – Approximately 9.0 m which is compliant the 'Minimum' criteria **Compliance – Achieved (but Minimum)**

- **Circulating Width** – Approximately 5.3 m which is well below the minimum of 6.5 m for a 9.0 m central radius. **Compliance – Not Achieved**
- **Vehicle Turn Paths** – Unclear what design vehicle utilised – Semi-Trailer (general access vehicle and, at minimum, the relevant check vehicle) not achievable for some turns. **Compliance – Not Achieved**
- **Sight Distance** – Unlikely considered as sight distance impacted by property on north-western corner (partial acquisition would have likely been required). **Compliance – Not Achieved**
- **Current Concordia (AECOM) Design**
 - **Approach Speed** – 60 km/h **Compliance – Achieved/Appropriate**
 - **Central Island Radius** – 12.0 m ('Desirable' criteria) **Compliance – Achieved/Appropriate**
 - **Circulating Width** – 5.9 m (as per 12.5 m Design Vehicle) **Compliance – Achieved/Appropriate**
 - **Vehicle Turn Paths** – 12.5 m Rigid for Design Vehicle and 19 m Semi-Trailer for Check Vehicle **Compliance – Achieved/Appropriate**
 - **Sight Distance** – Not assessed in detail but likely achievable with current design. **Compliance – Likely Achieved/Appropriate**

IN-02 KEY COMMENT – Delivery of the IN-02 roundabout for the Gawler East Deed would likely be associated with costs at the same (or at least similar) level as that for the design identified for the Concordia design. Consider exclusion from the Infrastructure Scheme.

2.3 IN-03 BAROSSA VALLEY WAY/CHEEK AVENUE

The AECOM investigations conclude that a signalised intersection will ultimately be required at the intersection of Barossa Valley Way and Cheek Avenue. I concur that such an intervention is appropriate given the anticipated future traffic volumes.

In comparison, the Gawler East Deed investigations identified varied comments on this intersection. Commentary was included in Tonkin's investigations that a roundabout would ultimately be required, albeit the Deed only identified a commitment to additional turn lanes. CIRQA's previous review of the Gawler East investigations (for the City of Gawler) recommended provision of a roundabout to accommodate future movements (which did not include allowance for Concordia related volumes). It does not appear, however, that a concept roundabout has previously been prepared for the intersection as part of the Gawler East investigations (noting that CIRQA's involvement with the review of those investigations did not include design review).

A very high-level sketch has, however, been provided as part of DHUD's Cheek Avenue engagement presentation. Based on features visible from the base aerial photography in

the sketch, the design has been scaled to allow comparison against the Austroads' criteria. I acknowledge that the sketch is not intended as a refined design. However, the purpose of the review is to ensure an adequate cost basis is adopted for comparison to the signalised ('with Concordia') intervention.

- **High-Level 'Before Concordia' Sketch**

- **Approach Speed** – Unclear **Compliance** – **Questionable**
- **Central Island Radius** – Approximately 6.9 m which is not compliant **Compliance** – **Not Achieved**
- **Circulating Width** – Approximately 4 m which is well below the minimum. **Compliance** – **Not Achieved**
- **Vehicle Turn Paths** – Not assessed to turn path level but likely extent of sketch would not accommodate required movements. **Compliance** – **Not Achieved**
- **Sight Distance** – Not assessed in detail but likely achievable with current design.). **Compliance** – **Further Review Required**

Achieving the relevant design criteria would result in a roundabout with an extent approximately 67% larger than that identified on the sketch. For comparison, Figure 1 illustrates the approximate extent of a conformant roundabout (based on 60 km/h design speed).

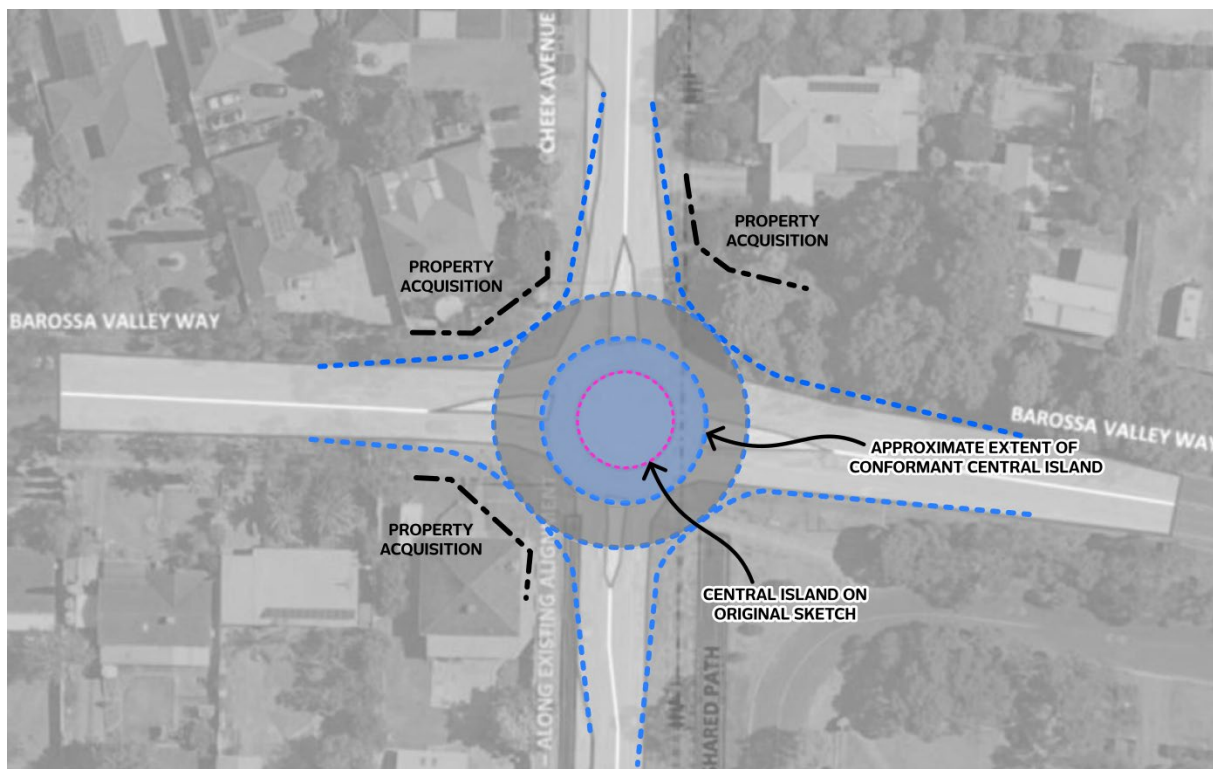


Figure 1 - Overlay of approximate extent of a conformant roundabout on high-level sketch (After DHUD, 2025)

As can be seen in Figure 1, a conformant roundabout would have property acquisition requirements on three corners. It is unclear if the costings for the 'Before Concordia' scenario have allowed for such acquisition (or the overall larger roundabout size likely required).

IN-03 KEY COMMENT – Review assumptions for the 'Before Concordia' roundabout upgrade for Barossa Valley Way/Cheek Avenue and ensure costings include sufficient allowance for realistic extent of treatment and property acquisition.

In addition to the above, noting the query in respect to the actual distribution of traffic likely to be assigned to the northern portion of Cheek Avenue (refer RD-04 comments above), it is possible that modelling of the IN-03 is based on higher volumes than will occur in reality (albeit I note that SIDRA modelling does not appear to have been undertaken for the intersection).

2.4 IN-04 BAROSSA VALLEY WAY/CONCORDIA ROAD

Consideration has been given to the implementation of either a roundabout or a signalised intersection at IN-04. Noting that the traffic signal costings are slightly lower than the roundabout option and there would be pedestrian and cyclist access benefits from a signalised treatment, the proposed signalised upgrade is considered appropriate.

I understand that others have queried the level of cost assigned to IN-04. The specifics of the costings are outside of my expertise and I defer to others to make comment on this aspect of the Funding Plan.

I note that no delivery responsibility is identified in the Funding Plan for IN-04.

IN-04 KEY COMMENT – Confirm delivery responsibility for IN-04.

2.5 IN-05 BAROSSA VALLEY WAY/NEW ROAD RD-08

The proposed treatment of IN-05 is considered appropriate as is the designation of this road as a *Charge on Land* infrastructure.

I understand that others have queried the level of cost assigned to IN-05. The specifics of the costings are outside of my expertise and I defer to others to make comment on this aspect of the Funding Plan.

2.6 IN-07 CONCORDIA ROAD/CENTRAL ARTERIAL

The proposed treatment of IN-07 is considered appropriate as is the designation of this road as a *Charge on Land* infrastructure.

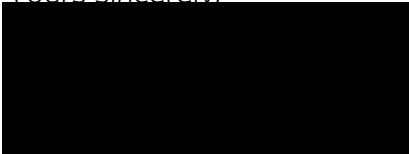
3. SUMMARY

Based on the review undertaken, I have identified a number of recommendations for consideration in respect to the various road and intersection interventions:

- (1) confirm costing methodologies particularly for interventions previously identified for the Gawler East Deed (noting concept designs informing the Gawler East investigations do not appear fit for purpose);
- (2) ensure that there are adequate mechanisms within the Infrastructure Scheme to address changes in ownership and potential fragmentation of the delivery of key road infrastructure;
- (3) review trigger points particularly in respect to the potential to stagger works to assist with funding and delivery;
- (4) alter the designation some items currently noted for *Developer Delivery* to be within the Scheme (*Charge on Land* infrastructure) – most notably Concordia Road (RD-06) and the internal collector loop (formed by RD-07A [Harris Road], RD-07B [Springbett Road], RD-10, RD-11 and RD12);
- (5) remove upgrades of the intersections of McMillan Parade/Schomburgk Drive (IN-01) and Cheek Avenue/Calton Road (IN-02) from the Scheme (given these treatments were already required for the Gawler East Deed and conformant treatments would not notably differ as a result of the CGA development); and
- (6) further review the conditions associated with and treatment of Sunnydale Avenue (RD-13) and include within the Scheme.

Please feel free to contact me on [REDACTED] should you require any additional information.

Yours sincerely,



BEN WILSON

Managing Director | CIRQA Pty Ltd



CLT Submission to Concordia Consultation Draft Infrastructure Scheme

Introduction

Thank you for the opportunity to provide feedback on the Draft Infrastructure Scheme prepared for the Concordia Growth Area (CGA). As you are aware, Concordia Land Trust (CLT) represents around two thirds of the total CGA and over the more than 12 years of our ownership we have undertaken significant planning works, including for key infrastructure.

Our response considers the key issues we have identified in our review, noting there is an extraordinary amount of information provided for this six (6) week consultation period.

Adopting an Infrastructure Scheme for the CGA was always expected to be a significant challenge. We continue to be solution focused on finding the best way forward to ensure we meet the legislative requirements of a Scheme and, most importantly, through this Scheme establish delivery and cost certainty which allows development of housing to not just commence as soon as possible, but to continue quickly.

We wish to acknowledge that State Government has made a very positive decision to allocate upfront enabling funding to ensure the commencement of development in a timely manner and we commend the Government for supporting the rezoning with such funding, including the funds which will cash flow the early road interventions.

It is frustrating that more than 2.5 years following Initiation of the Code Amendment, the details provided for the Infrastructure Scheme have only been made available at this very late stage. The process has been, and continues to be, disjointed in that a Code Amendment has been completed but only following that were the details of the Infrastructure Scheme issued. Further, having such a long period of time elapse and then have the consultation and documentation of the Scheme compressed into such a short time creates the potential for unintended outcomes which could hamper the benefits of the Scheme.

All our work in this review is designed to contemplate these issues for positive resolution.

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.

Most frustratingly, we consider the content and costings provided in the Scheme reflect deficiencies in planning over the long period of time since Initiation, a result of an incorrect approach by previous members of HIPDU/GICU. A lack of engagement with ourselves (and



24 St Helena Place, Adelaide SA 5000

08 7223 8890

www.concordialand.com.au

others) as landowners from early in the process and the disregard for our representations (prior to Iain McPhillips' introduction) has, in our view, resulted in work now needing to be completed which could have been done already. There is now considerable additional work to refine to ensure State Government and Developers within the CGA achieve best value for money in terms of investment. That a surely a shared aspiration.

Notwithstanding the above, we have taken the approach of promoting solutions whereby we can ensure maximum investment value for the contributions proposed. To that end, our submission talks to the key infrastructure items as follows:

- Water – ensure consistency across all State provisions and beneficiaries
- Sewer – ensure costs will reduce through competitive tendering and 3rd party providers given SA Water's lack of planning and uncompetitive costs
- Roads – refine the inclusions in the Scheme to ensure key roads have delivery certainty and have been procured and costed so as to stretch the current budget and include significantly more outcomes for the same money.

We believe every day between now and completion of the Scheme is critical to ensuring the Scheme meets the legislative and commercial requirements for all stakeholders and remain ready to invest as much time as possible with Government to achieve this. We strongly believe a collaborative approach is the only way to achieve this and wish to work with Government as partners.

Executive Summary

- CLT has reviewed all of the documents associated with the proposed Concordia Basic Infrastructure Scheme (the Scheme) noting that there has been a significant amount to absorb in a relatively short period of time.
- We appreciate that this is the first Infrastructure Scheme to be implemented in South Australia and therefore teething problems are to be expected.
- CLT is pleased that the State Government has allocated upfront enabling funding to ensure the commencement of development in the CGA and, we commend the Government for supporting a significant planning decision to rezone the CGA with such funding.
- To this end, we wish to highlight that the deficiencies in the Concordia Scheme are largely the result of insufficient detailed planning having been undertaken in the preceding two years. Inadequate briefing of consultants, a lack of involvement by the key landowners in the preparation of the consultants reports and master plan, along with the inability of the key infrastructure agencies to undertake detailed planning work over this period, has resulted in a proposed Scheme which may challenge the ability of development to progress immediately and meet Governments' objective of increasing housing supply.
- Over the course of the last two and a half years, we have only met with SA Water on two occasions for relatively high-level discussions in relation to sewer and water infrastructure. There has been no engagement on the matter of beneficiaries, design scope and network strategy in relation to the road interventions and their status within the Scheme.
- The use of ROM costs as the basis for the Scheme charge is also problematic because they involve very large numbers and can easily set unreasonable expectations for budgets moving forward. All landowner parties have raised questions about the costing assumptions used for water, wastewater and road infrastructure.
- As such we have been presented with an outcome that does not meet the expectations we had for the Scheme at the start of the process.

- We believe it is important that the Scheme is progressed quickly. The structure and charge as presented in the draft documents do not work, however, with appropriate amendments the timeframe of end January 2026 can still be achieved.
- Following review of the documentation by our specialist consultant team, a detailed assessment of the key components of the Scheme is provided below, these components being:
 - Infrastructure Scheme structure and governance
 - Water strategy and charge
 - Wastewater strategy and charge
 - Stormwater strategy
 - Road strategy and charge
 - State Social Infrastructure
- Our position is that the matters we raise, and subsequent amendments to the Scheme and charge, should be dealt with prior to the approval of the Scheme by the Minister, in February 2026.
- Variations to the Scheme as envisaged in the legislation, are intended to respond to the development as it evolves over the project’s life. They are not designed to develop the Scheme in detail post adoption and are deficient in this respect.
- [REDACTED]
- [REDACTED]
- We consider the implementation of the Scheme is not contingent upon this Cabinet approval.

Proposed Solutions

- In summary, CLT proposes the following changes to the infrastructure specific elements of the Scheme:

Water

- [REDACTED]

Sewer

- Amend wording to ensure sewer can be provided by a third-party provider, as outlined below.
- [REDACTED]

Roads

- 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 (refer Table 1).
- [REDACTED]
- An amendment to the road interventions that are to be cash flowed by the State as per Table 4.

Stormwater

- Removal of stormwater from the Scheme in its entirety, as it is not part of the funding arrangements and, it is very prescriptive despite a final design not being resolved. This has the potential to create a barrier and compromise an integrated and well-planned stormwater solution for the CGA.
- Following Ministerial approval detailed design work would be undertaken in order to ensure the best value delivery solutions for both the developer and the taxpayer.

Infrastructure Scheme Structure and Governance

Extent of information in draft scheme

- It is important to ensure that the scheme at least contains the minimum information necessary to meet the requirements of the Act.
- We are concerned that the desire for flexibility has limited the amount of information in the draft scheme report.
- Section 163(6) required the draft outline to contain "detailed information" about the nature and intended scope of the infrastructure and to provide information about the proposed timing or staging of the various elements of the scheme. This draft scheme report under consultation is therefore required to build on that information as the scheme coordinator sets out the "scoped and costed proposals" and shows the work program for the scheme along with the details of the funding arrangement (see section 166(1)).
- The draft scheme report uses slightly different language to the Act but clearly intends to set out the scope of the infrastructure to be delivered and to indicate when that delivery will occur. It does so in various locations including in table 3 for roads bridges and intersections, water and sewer and in table 4 relating to stormwater. Appendix D contains a works program in Appendix E contains a brief table setting out a funding arrangement charge on land calculation. It does not go far enough.
- The combined effect of sections 163 and 166 of the Act is that the scheme report must include sufficient details for each of the items of work to satisfy the requirement in the Act that for "detailed information" and that they are "scoped". The corollary of that requirement is sufficient detail for the works to be properly costed. It is necessary for the scheme report to contain as much detail as possible about each item of work.
- Even if only summarised in table 3, the substance of the scope of each element will need to be included in appendices to the report.

Apportionment

- The concept of the apportionment to the growth area in table 3 is unclear.
- The report should specify whether the apportionment column merely refers to the proportion of the overall cost of the relevant item of work.
- For those items where the apportionment is less than 100% to the CGA, the funding sources for the remainder of the cost should be specified in the funding arrangement.
- 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. The report ought to outline the intended mechanism (most likely a binding agreement with the relevant council) for that relevant contribution.

Delivery responsibility

- Table 3 also contemplates delivery responsibility. In the case of delivery by the State the scheme can rely on the terms of sections 187 and 191 of the PDI 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.

- Unfortunately, however 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.
- 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.
- The trigger for delivery column in Table 3 is somewhat ambiguous. In almost all cases it is a very succinct 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.
- 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.
- 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.
- 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.
- 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).
- 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.
- 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 form part of the scheme itself, including scheme funding and scheme delivery. This is preferable to assumed delivery by individual landowners (to avoid the Heysen Boulevard problem).

Works in Kind

- The works in kind policy is a general policy statement and might benefit from further refinement and details. In any event the policy cannot be a separate policy at large and must be included in the scheme report as an inherent part of the way in which the scheme will operate.
- 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.

Water

- The SA Water network planning assessment and strategy prepared for the CGA and the wider growth areas (Gawler East, Roseworthy, Blakeview and Kudla) appears to have a depth of technical assessment completed. Sizing of key infrastructure and a staging roll out has been prepared.
- In reviewing the infrastructure proposed (WGA’s letter of advice is attached for reference) it is difficult to make comment given the wider network that has been modelled and serviced. On the surface the pipe sizing does appear very large, pipe sizes up to DN1700 are not that commonly used. The SA Water memo recognises this, stating “Concordia is the beneficiary of this investment in the order of 20%”.
- A high-level summary of the phased delivery is as follows:
 - Phase 0 – 600 lots (300 Lots CLT), requires 600m of DN300 to be delivered by the Developer.
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- Our review of the strategy has identified the following key issues:
 - [REDACTED]
 - [REDACTED]
 - In their advice provided to the Scheme, SA Water states that the enabling works (trunk infrastructure) to service Concordia will also benefit other surrounding areas. “The enabling works is therefore sized to service multiple growth areas including Gawler East, Roseworthy, Blakeview and Kudla. Concordia is the beneficiary of this investment in the order of 20%.”
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - SA Water’s water assessment appears to have been based upon 15,000 lots, the Scheme refers to 12,000 lots.
 - The Scheme Phases and respective allotment numbers (Phase 0 – 600lots, Phase 1 – 2,600/lots) do not align with SA Water (Phase 0 – 500 lots, Phase 1 up to 2,000/lots).
 - Scheme Table 5, ‘Delivery Responsibility’ column should be added to be consistent with other sections.
 - The planned water infrastructure needs to be prepared on a clearer set of plans for the Scheme. Noting no water or wastewater key reference plans in the main Scheme document.
 - Scheme Appendices in the main document including the detailed program of works provided in Appendix D is blurred and not readable.
- Due to the nature, quantum and the way the information is presented in the Scheme, respective stakeholders would benefit from an interactive debriefing workshop. Further consideration should be given to remove the repetitiveness of items in the Scheme and simplify the readability for easement of execution moving forward.

Wastewater

- 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 *ref B1.2025.1*. A staged approach is outlined:
 - Phase 0: 200 to 500 allotments serviced by tankering.
 - Phase 1: Up to 2,000 allotments services via a small package plant.
 - Phase 2: Up to 15,000 allotments, servicing option to be confirmed.
- Our review of the strategy has identified the following key issues:
 - It appears an existing network investigation has identified limited and or no capacity in the existing system, resulting in all initial allotments to be tankered to Bolivar WWTP.
 - 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.
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - 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.
 - SA Water do not have a clear long term wastewater strategy, presenting options to treat onsite in a larger WWTP or transfer pump to Bolivar. Not having a clear strategy early risks abortive works and associated costs occurring.
 - SA Water's wastewater assessment appears to have been based upon 15,000 lots, the Scheme refers to 12,000 lots.
 - The Scheme Phases and respective allotment numbers (Phase 0 – 600/lots, Phase 1 – 2,600/lots) do not align with SA Water (Phase 0 – 500 lots, Phase 1 up to 2,000/lots).
 - Scheme Table 6, 'Delivery Responsibility' column should be added to be consistent with other sections.
 - [REDACTED]
- In summary, the wastewater assessment and costings presented are limited. In the two and half years that SA Water has been engaged on this project, the resultant cost estimates cannot be considered reasonable or value for money, reflecting a lack of detailed planning.

- To provide options for the whole of the development of the growth area (phases 0 to 2) and to enable third party wastewater industry entities the scheme should state as follows (or to the following effect):
 - *Wastewater infrastructure and services will be provided by a water industry entity under the water Industry Act.*
 - *If a third-party water industry entity (or entities) engaged by a developer (or developers) is to provide wastewater infrastructure and services for the Growth Area then the scope and timing of infrastructure and contributions will be determined by the water industry entity and the developers by separate agreement and such works will not form part of this scheme.*
- While SA Water has been asked to confirm that the CGA can be serviced by sewer, it is the firm intention of all landowners to engage an appropriately licenced third party provider to a value for money solution.

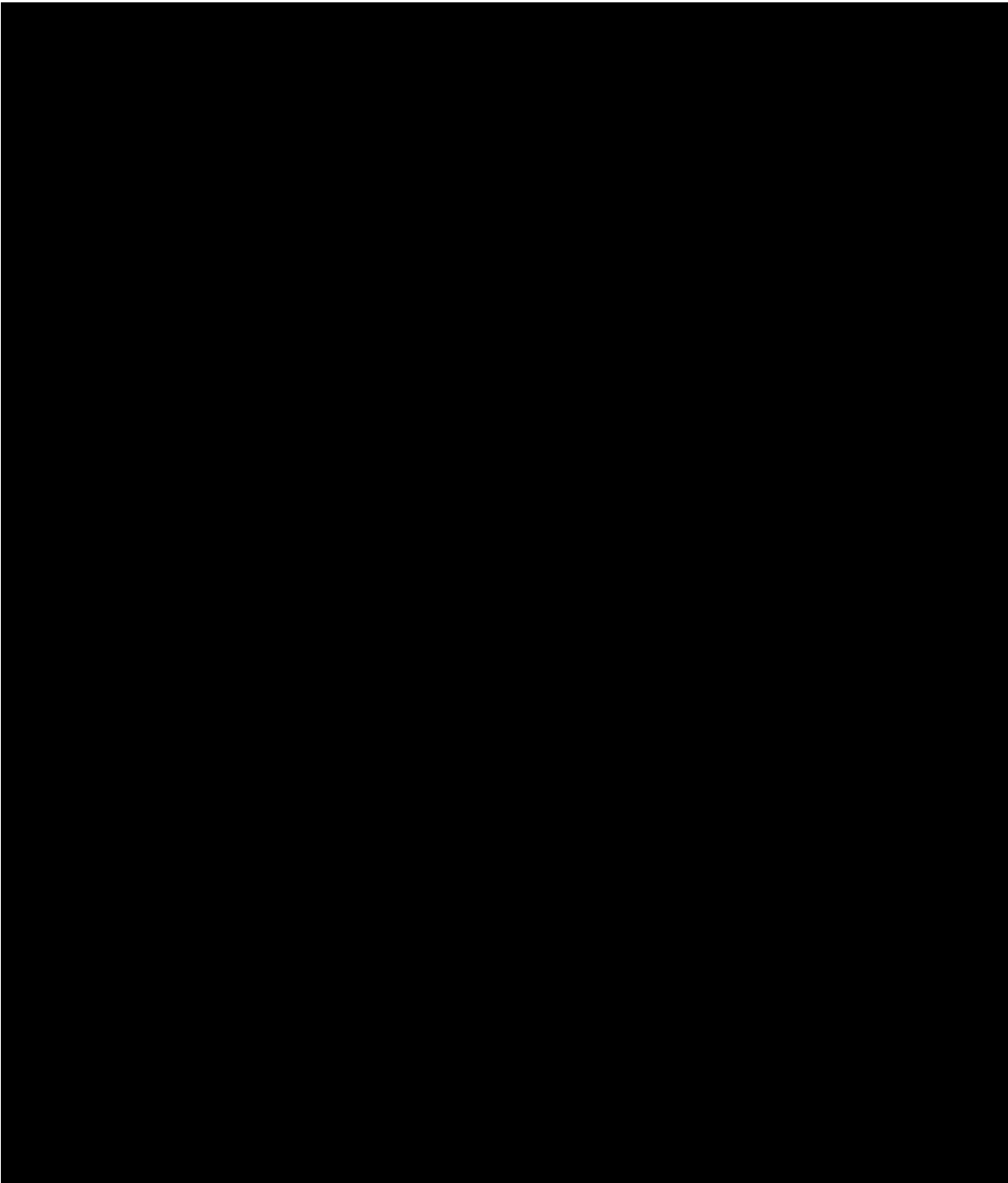
Stormwater

- A stormwater management strategy (SMP) has been prepared by Tonkin Engineers (15/04/2025). This report sets out a broad strategy from which the Scheme draws upon its key infrastructure requirements.
- However, it must be recognised that land development and its stormwater management framework in South Australia generally follows a collaborative effort between state and local governments Authorities and, developers. The framework focusses on risk management, and the key objectives of stormwater management:
 - Flood management
 - Peak flow management
 - Stormwater quality management and improvement
 - Environmental risk management and protection, and
 - Economic and social wellbeing considerations.
- In this regard it 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. The basis for this position is further outlined below:
 - The land tenure is largely within its own is closed catchment, with an upstream catchment that enters the land via waterways. Therefore, there is no reliance on providing provisions for critical external infrastructure to service the Development.
 - The Development site's topographic characteristics provide the ability to develop a flexible and optimised approach to the positioning, spatial allocation and type of solution or asset that is adopted.
 - 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.
 - 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.

- Lack of engagement with key stakeholders including the Environment Protection Authority (EPA) and the Department of Environment and Water (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.
- Further assessment and optimisation of the strategy should be carried out to better inform the sequencing and implementation of key assets.
- In the absence of a singularly controlled, detailed master plan, the opportunity to strategically locate key assets may be diminished and therefore the Scheme limits the ability to be flexible and adaptable to a changing development strategy in the longer term, and this may present lost opportunities due to the restrictive nature of a Scheme.
- In similar large scale land developments stormwater management principles, objectives and implementation are achieved via a collaborative process between Authorities. There are current mechanisms in place that will oversee the successful implementation from master planning through to construction.
- 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.
- It is not clear why they are included in the scheme at all and, therefore their inclusion in the Scheme is inappropriate and may create a barrier and compromise an integrated and well-planned urban development.

Roads

- Regarding the Gawler East Road Interventions:
 - Cirqa have reviewed the Gawler East related traffic interventions (their letter is attached for reference) in detail and confirmed our consistently state position that significant errors have been made in the costing of Gawler East interventions and the assumptions about CGA's contribution.
 - It is our position that interventions RD03a, RD03b, IN01 and IN02 require no CGA contribution as there has been very little to no scope change because of increased traffic volumes. In some cases, the 'before Concordia' road/intersection design was not compliant even without considering the CGA.
 - The CGA's contribution to IN03 is likely to be reduced pending clarification of the assumptions made about the 'before Concordia' design.
 - 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.
 - 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.



- The other road interventions are discussed below. Prior to receipt of the draft Scheme, we were not part of detailed discussions about the beneficiaries, scope, triggers and status of the various interventions.
- [REDACTED]
- 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.

- Inclusion of interventions which will prevent fragmented implementation of key routes through the area which could arise due to multiple land ownership.
- More realistic costings based on current project delivery rates. We acknowledge that these costings will need to be revised over the coming weeks and may result and amendments to our proposed strategy.

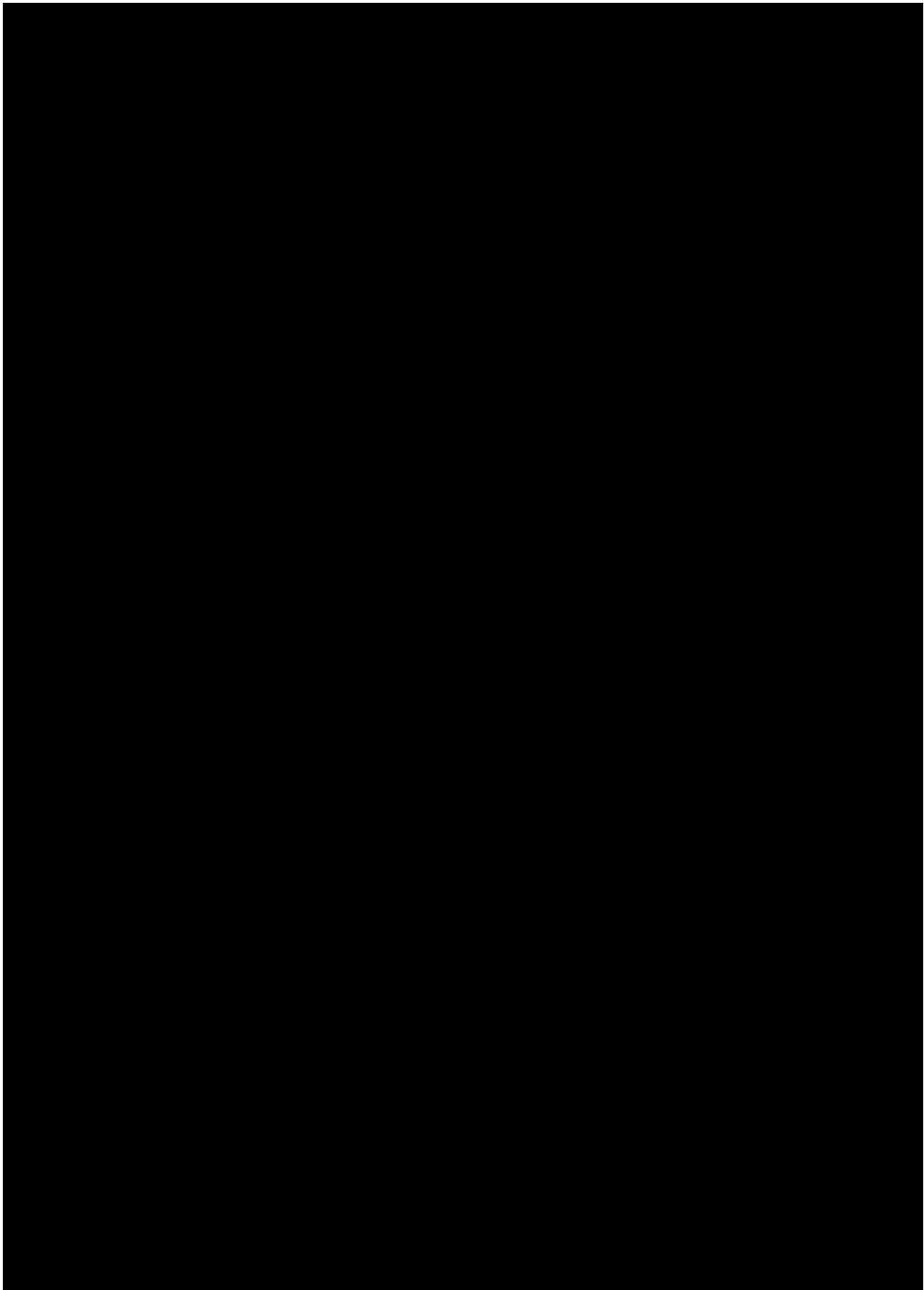
Table 2 – Direct Delivery and Charge on Land Interventions

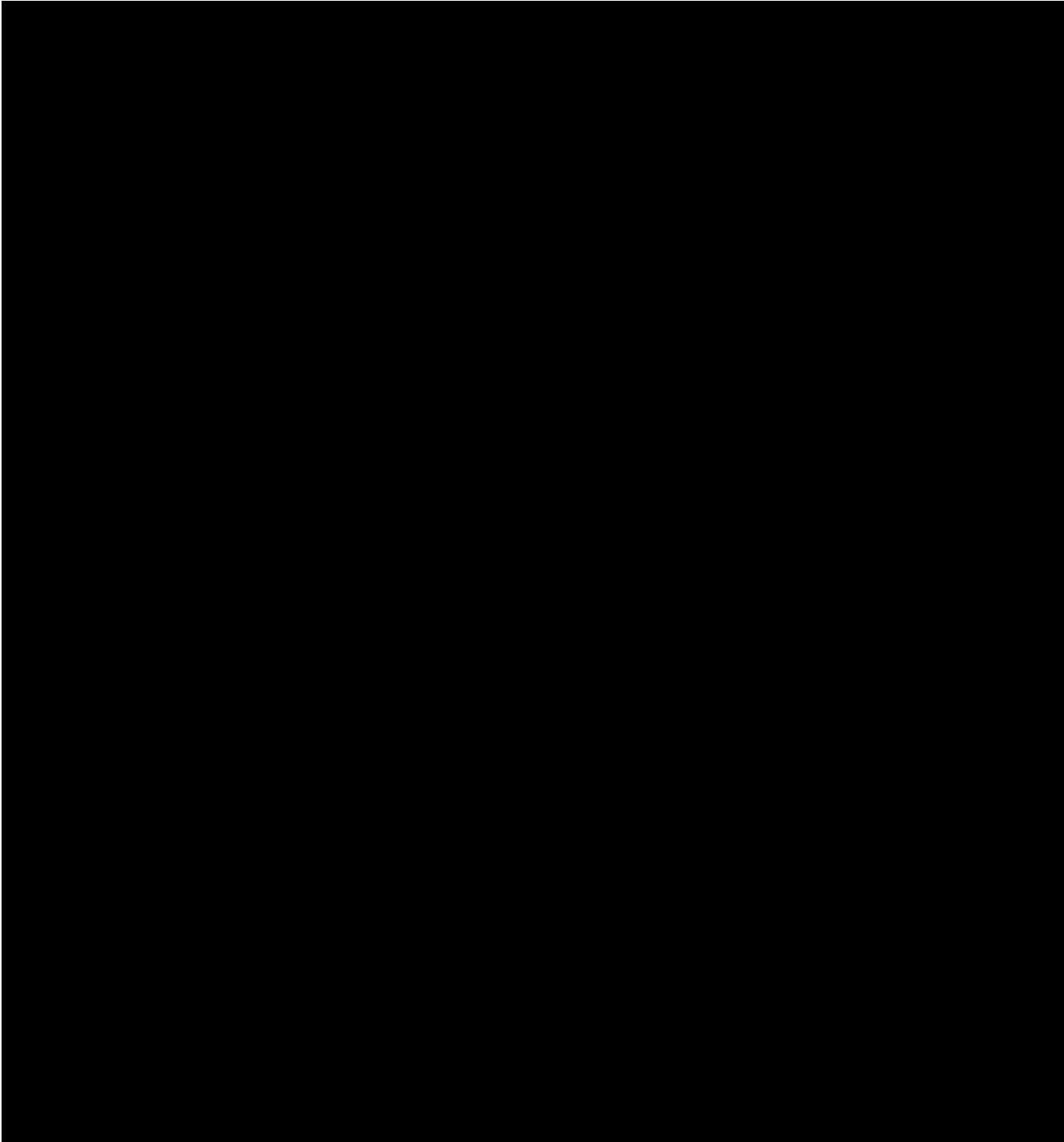
Project	Description	Review	Suggested Outcome
RD04	Cheek Avenue (Barossa Valley Way to Harris Road)	There are remaining queries in respect of the level of traffic distributed via this section from the modelling undertaken. Specifically, Concordia Road volumes will likely be higher than identified in the modelling and that (at least the northern section of) Cheek Avenue may accommodate even lesser increases than suggested. Cirqa also estimate that 18.6% of future volumes on this portion of Cheek Avenue are anticipated to be associated with Gawler East/Springwood. Arguably, there should be contribution to the RD-04 by Gawler East/Springwood. It is acknowledged that this would be outside of the existing Gawler East Deed and not easily assigned to those parties. However, this should be considered in the context of the CGA's proposed contribution to other upgrades. Delivery responsibility sits with Town of Gawler but they are not party to the Scheme.	<p>Ensure future volumes adopted for the assessment of Cheek Avenue are appropriate and do not include combined Concordia Road Volumes.</p> <p>If the lower volumes assigned to Cheek Ave are adopted, then the Gawler East/Springwood contribution would equate to 23.3% further strengthening the argument for an offset against CGA's contribution to IN03.</p> <p>Need to clarify delivery mechanism.</p>
RD05a	Barossa Valley Way (Cheek Ave to Concordia Road)	Trigger of 300 dwellings has been identified which is very early in the project. It is anticipated that a reasonable portion of traffic would be distributed via Sunnydale Ave (in the interim).	Noting that several interventions have been assigned to a 300-dwelling trigger, there may be opportunity for review and consideration of staggered triggers to 'spread the load' in respect

			to funding and delivery of the interventions. Include in Scheme
RD05b	Barossa Valley Way (side roads)	Little detail provided as to nature of intended upgrades. May relate to Wheatsheaf Avenue. [REDACTED] [REDACTED] [REDACTED]	Confirm extent of upgrades and appropriateness of costs. Include in Scheme
RD06	Concordia Road (Barossa Valley Way to Harris Road)	Assignment of Concordia traffic volumes via Concordia Road appears low and requires further modelling. This road will form part of the direct link to the Sturt Highway. It is also a key connection to the Neighbourhood Activity Centre and will accommodate the proposed regional Hospital.	Concordia Road may accommodate a greater traffic volume (and subsequently Cheek will accommodate less). Review funding approach to RD06 with <i>Charge on Land</i> considered more reflective of its strategic importance to the road network.
RD07b and RD07c	Springbett Road (Harris Road to Bypass Road)	The Mesh plan notes that the AECOM assessment has designated these roads as 'key routes', however, such designation is not clearly noted in the AECOM reports provided. Accordingly, it is not clear how the function of RD-7B/RD-07C differs from other internal collector roads (such as RD-7A, RD-10, RD-11 and RD-12). Springbett Road comprises an existing road reserve and has different ownership on the northern and southern side. The Funding Plan identifies delivery responsibility for Springbett Road as being assigned to 'Developers'. However, the mechanism by which delivery of such sections of road is delivered is unclear.	Include in Scheme as road forms part of key collector loop roads and crosses multiple land ownerships.
RD10, RD11 and RD12	Collector Road Loop	Consideration should be given to the possibility of future break-up of land holdings resulting in a different ownership mix of the Growth Area (i.e. there are no guarantees that the	Include in Scheme as road forms part of key collector loop roads, crosses multiple land ownerships and benefits all landowners.

		current ownership arrangements will be maintained through Phases 0, 1 and 2). Should this occur, there is potential that the developer-driven delivery of the collector loop could result in a fragmented implementation (under interim scenarios) as has occurred with Heysen Boulevard in Mount Barker.	
RD13	Sunnydale Avenue	Will provide an important connection south to Springwood Centre in early phases of project.	Include in Scheme
IN04	Barossa Valley Way and Concordia Road	It is unclear whether the costing has been based on a roundabout or a signalised intersection as both are referred to in the documents. A signalised intersection is considered appropriate. No delivery responsibility has been identified.	Include in Scheme as intersection is critical to project accessibility and is on a State road.

- Therefore, based on this assessment we propose the interventions set out in the following Table 3 and Figure 1 are included in the Scheme:



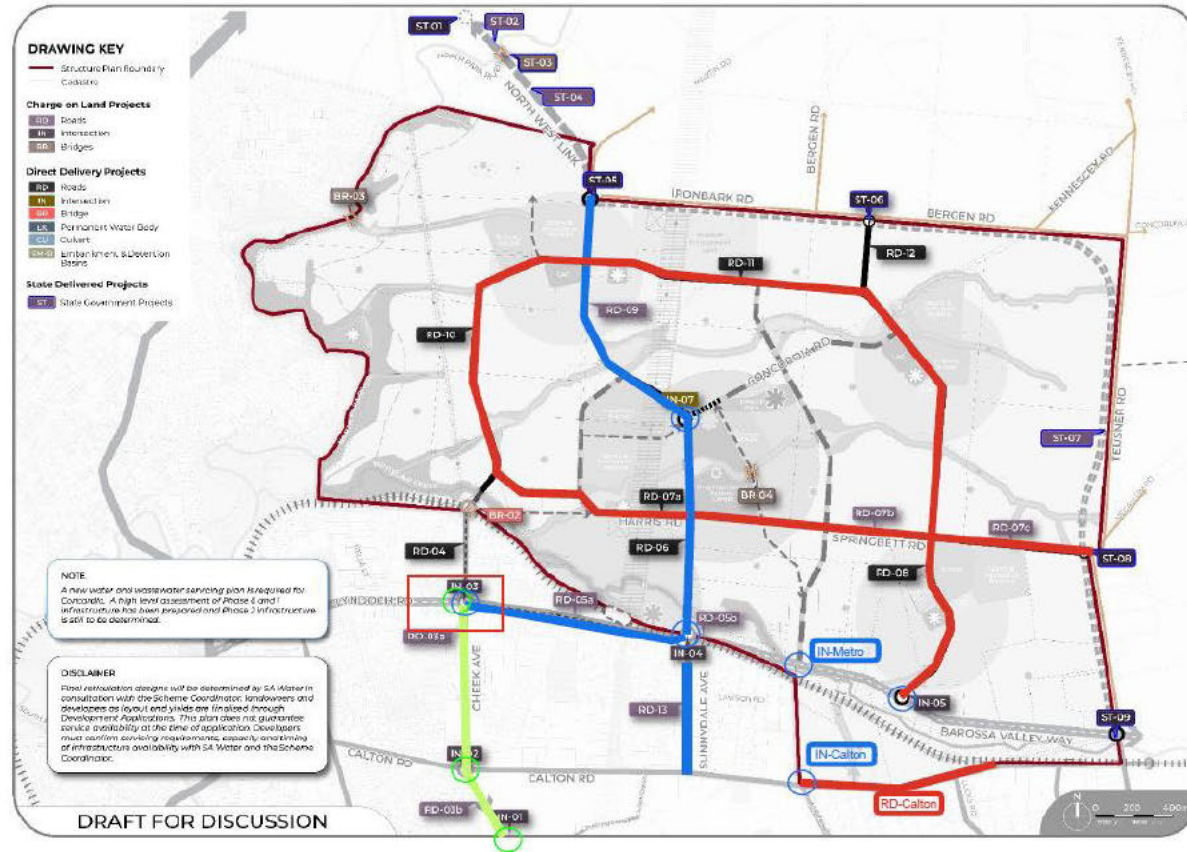


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Figure 1 - Concordia Infrastructure Scheme Transport Interventions

OFFICIAL

Figure 9: Proposed Concordia Basic Infrastructure Scheme Projects SCHEME PROPOSAL



OFFICIAL

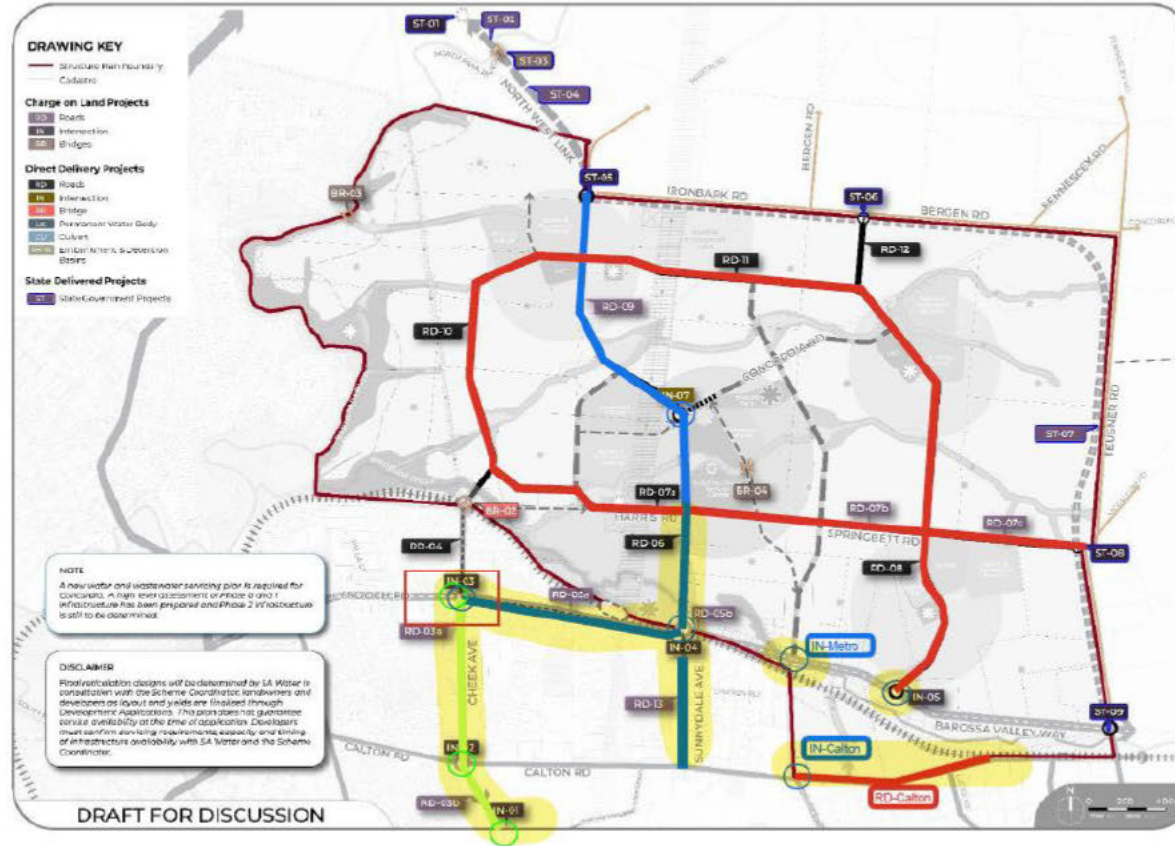
- [REDACTED]

[REDACTED]

Figure 2 - Concordia Infrastructure Scheme Cash Flowed Interventions

OFFICIAL

Figure 9: Proposed Concordia Basic Infrastructure Scheme Projects CASHFLOW PROPOSAL



- In regard to development beyond 2600 lots, it is our understanding that the Scheme confirms the States' agreement to deliver the connection to the Sturt Highway pending final design and costing, and it is the Scheme Co-ordinators role to ensure delivery.
- 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.

State Social Infrastructure Deed and Connection to Scheme

- CLT remain concerned that 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 Chief Executive. This appears inconsistent with the principles of procedural fairness that Government is obliged to uphold.
 - 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%. This compares to:
 - Teusner – 112 ha of which 16ha or 14% is not developable for residential/commercial.
 - Metro – 135 Ha of which 22 ha or 16 % is not developable for residential/commercial.
 - 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 Co-ordinator has powers to direct outcomes for that land in accordance with Concept Plan 161 in the Code.
 - 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.
 - As the Concordia Code Amendment was prepared without us having seen the Infrastructure Scheme, and the Scheme has been prepared without us seeing the State Social Infrastructure Deed, it is difficult to understand the intentions relating to the purchase of land for State infrastructure.
 - 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.
 - 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.
 - Of particular concern is the current requirement for CLT to provide discounted land for social services and active open space in the north-west corner of the CGA. This land directly benefits the Meland Pty Ltd holding without the landowner making any land contribution.
 - CLT does not support making a commitment to provide land for a public primary school in this location because of the inequity in provision of non-income producing land across the three main landowners and, because the development of this area is likely to be some 20+ years away. CLT has highlighted this issue for some time without resolution.
-

- CLT holds the same position in relation a commitment for provision of land to Council for a sports and recreation hub in this location, which is closely tied to the location of a potential future primary school.

Minor Errors

- The Mesh Master Plan and Land Budget Plan needs to be updated to reflect the final version of the Code Amendment Land Use Plan.
 - Reduction in size of Employment Zone
 - Increase in size of public school land
 - Introduction of buffer areas
- 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.
- Table 20 Parcel Specific Land Budget – note that CLT does not own Parcel 19.
- Page 21, para 4 of Funding Plan refers to Section 5.3.1 but there is no such section

COMPANY NAME	Concordia Land Management (CLT)
ATTENTION	Anne Highet
SUBJECT	Concordia Infrastructure Scheme (CIS) – Review

Wallbridge Gilbert Aztec (WGA) has been engaged to undertake a technically focused review of the draft Concordia Basic Infrastructure Scheme (CIS) prepared by the Department for Housing and Urban Development (DHUD) with Scheme reference B1.2025.1 (draft).

WGA's review is primarily focused on a technical standpoint to review the CIS to provide advice on the following basis:

- Implementation of the CIS and its practical application.
- Key infrastructure requirements and their implementation.
- Practical application of the CIS with regard to suitability to enter into agreement from a technical standpoint.
- A review on the level of design maturity completed to inform the CIS.

This technical note summarises our review and recommendations for the Concordia Development as it relates to the Concordia Land Development Group. The technical review is summarised into the three key infrastructure categories outlined below.

Stormwater Management

A stormwater management strategy (SMP) has been prepared by Tonkin Engineers (15 April 2025). This report sets out the strategy from which the CIS draws upon its key infrastructure requirements. It is important to note that the stormwater management framework in South Australia follows a set of principles that relate to:

- Flood management
- Peak flow management
- Stormwater quality management and improvement
- Environmental risk management and protection
- Economical and social well-being considerations

Land development and its stormwater management framework in South Australia generally follows a collaborative effort between state and local government Authorities. It focuses on risk management, and the above-listed key principle objectives of stormwater management. In this regard, it brings together key Government bodies and their associated regulations. It is for this reason that WGA recommends that a CIS for stormwater management of the Concordia Land Management Group is not considered practical from a practical and technical perspective. The basis for this is also further outlined below:

- The land tenure is largely within its own closed catchment, with an upstream catchment that enters the land via waterways. Therefore, there is no reliance on providing provisions for critical external infrastructure to service the Development.
- The Development site's topographic characteristics provide the ability to provide a flexible and optimised approach to the positioning, spatial allocation and type of solution or asset that is adopted.

- 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 have not been addressed. Strategies for dealing with stormwater treatment have not been adequately addressed.
- Typically, land development relies on a 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.
- Engagement of key stakeholders, including the Environment Protection Authority (EPA) and the Department of Environment and Water (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 therefore places uncertainty on the Strategy.
- Further assessment and optimisation of the strategy should be carried out to better inform the sequencing and implementation of key assets.
- In the absence of a detailed master plan, the opportunity to strategically locate key assets may be diminished, and therefore, the CIS limits the ability to be flexible and adaptable to a changing development strategy in the longer term, and this may present lost opportunities due to the restrictive nature of a CIS.

Based on the above points, WGA recommends that a CIS for Stormwater Management would create a barrier to optimising the overall Strategy and its implementation of multi-objective outcomes. Furthermore, the current SMP (2025) lacks detail, with an array of options proposed with no definitive Strategy being presented. We note that critical Government Stakeholder engagement will be necessary to ensure the strategy achieves in principle support.

It is our experience on similar large-scale Land Developments that Stormwater Management principles, objectives and their implementation are achieved via a collaborative process between Authorities. There are current mechanisms in place that will oversee the successful implementation from Master Planning through to construction. It is for this reason that we recommend that a CIS for stormwater management will create a barrier and compromise an integrated and well-planned urban development.

Wastewater Management

SA Water have prepared a technical note capturing the servicing assessment completed and outlined a delivery strategy, unreferenced document received dated October 2025. The document appears to have formed the basis for the CIS document *ref B1.2025.1*.

A staged approach is outlined:

- Phase 0: 200 to 500 allotments serviced by tankering
- Phase 1: Up to 2,000 allotments services via a small package treatment plant
- Phase 2: Up to 15,000 allotments, servicing option to be confirmed

WGA's review feedback and clarification items as follows:

- It appears SA Water have completed an existing network investigation which has identified limited and or no capacity in the existing system, resulting in all initial allotments to be tankered to the Bolivar Wastewater Treatment Plant (WWTP).
- The developer is responsible for the tankering until December 2029, whereby the Phase 1 Interim WWTP comes online. It should be noted 500 allotments may be up to 5 to 6 45kL semi tankers per day for a four-year period.

- [REDACTED]

- [REDACTED]
- Nominal discussion on the solution provided; it does not appear to be located within the structure plan.
- [REDACTED]
- SA Water's note 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.
- SA Water do not appear to have a clear long-term wastewater strategy, presenting two options to treat onsite in a larger WWTP or transfer pump to Bolivar. Not having a clear strategy early risks abortive works and associated costs occurring.
- SA Water's wastewater assessment appears to have been based upon 15,000 lots; the CIS refers to 12,000 lots. The misalignment to be addressed.
- The CIS Phases and respective allotment numbers (Phase 0 – 600/lots, Phase 1 – 2,600/lots) do not align with SA Water (Phase 0 – 500 lots, Phase 1 up to 2,000/lots).
- CIS Table 6, 'Delivery Responsibility' column should be added to be consistent with other sections.
- [REDACTED]

In summary, the wastewater assessment and costings presented is limited. A tankering solution to commence development is not uncommon however, the period should be shortened. Further consideration should be given to private wastewater solutions and associated flexibility built into the CIS document for this to occur, allowing for a more dynamic, timely and cost-effective options to be considered.

Water Supply

The SA Water network planning assessment and strategy prepared for the CGA and the wider growth areas (Gawler East, Roseworthy, Blakeview and Kudla) appears to have a depth of technical assessment completed. Sizing of key infrastructure and a staging roll out has been prepared.

In reviewing the infrastructure proposed, it is difficult to make a comment given the wider network that has been modelled and serviced. On the surface, the pipe sizing does appear very large; pipe sizes up to DN1700 are not that commonly used. The SA Water memo recognises this, stating "Concordia is the beneficiary of this investment in the order of 20%".

A high-level summary of the phased delivery is as follows:

- Phase 0 – 600 lots (300 Lots CLT), requires 600m of DN300 to be delivered by the Developer.
- [REDACTED]
- [REDACTED]

WGA's review feedback and clarification items as follows:

- [REDACTED]
- SA Water's water assessment appears to have been based upon 15,000 lots, the CIS refers to 12,000 lots. The misalignment to be addressed.
- The CIS Phases and respective allotment numbers (Phase 0 – 600lots, Phase 1 – 2,600/lots) do not align with SA Water (Phase 0 – 500 lots, Phase 1 up to 2,000/lots).
- CIS Table 5, 'Delivery Responsibility' column should be added to be consistent with other sections.

- The planned water infrastructure needs to be prepared on a clearer set of plans for the CIS. Noting no water or wastewater key reference plans in the main CIS document.
- CIS Appendices in the main document including the detailed program of works provided in Appendix D is blurred and not readable.
- It is assumed the infrastructure will be delivered through SA Water panel framework. Given the size of the infrastructure and interface with the new Greenfields development coordination and preplanning will be required in positioning the assets.

The nature, quantum and the way the information is presented in the CIS respective stakeholders would benefit from an interactive debriefing workshop. Further consideration should be given to remove the repetitiveness of items in the CIS and simplify the readability for easement of execution moving forward.

Should you wish to discuss in further detail any of the above points, please contact the undersigned.

Yours Sincerely



Ryan Byrne
Senior Principal Civil Engineer
WALLBRIDGE GILBERT AZTEC

November 26, 2025

Mr Iain McPhillips
 Concordia Growth Area Infrastructure Scheme
 Department for Housing and Urban Development
 Via: PlanSASubmissions@sa.gov.au

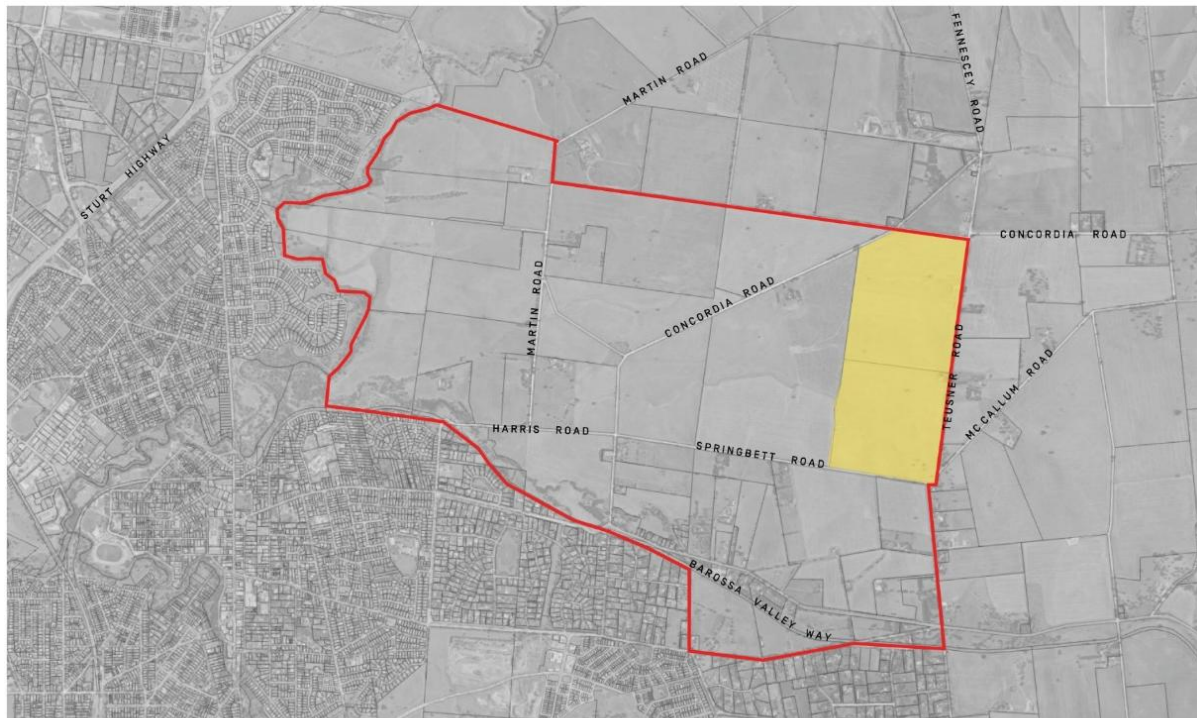
Dear Iain

SUBMISSION TO THE DRAFT CONCORDIA BASIC INFRASTRUCTURE SCHEME AND FUNDING PLAN

We have prepared this submission on behalf of Meland Holdings Pty Ltd ('Meland') in respect to the draft Concordia Basic Infrastructure Scheme ('scheme') and funding plan.

Meland has an interest in land within the Concordia Growth Area ('CGA') and to which the scheme will apply, identified in Figure 1.

Figure 1 *Meland Land Interest*



Plan Production: 23/07/2025

Concordia Plan
 SCALE: 1:20 000

LEGEND	
	Affected Area
	Meland Holdings land



Summary

In principle, Meland would be supportive of a scheme and funding plan that delivers timely and coordinated infrastructure to support future development of the CGA. However, Meland does not support the scheme as currently drafted and has significant concerns, in particular:

- the proposed staging and sequencing of infrastructure works that limit development to Phase 0 and 1 with no apparent mechanism to enable other landowners to develop earlier;
 - To ensure equitable development opportunities and accelerate housing delivery, the Scheme should incorporate a formal resequencing mechanism. This mechanism must include objective criteria such as demonstrated housing demand, readiness of landowners, and alignment with State housing priorities;
 - Additionally, if Phase 0 or Phase 1 developers fail to lodge land division applications within six months of scheme approval, Phase 2 developers should be permitted to advance. This approach will mitigate risks of stagnation and support multiple development fronts to address the housing crisis;
- it benefits some landowners/developers over others through the sequencing limiting the ability to provide a competitive housing market and mitigate an increasingly unaffordable housing market
 - Developers willing to forward-fund enabling works should have access to a fast-track pathway with guaranteed reimbursement or credits under the scheme;
- probity of the investigations undertaken to determine road upgrades and costings;
- uncertainty around the scheme costing for future Phases of the CGA;
- reliance on SA Water to provide wastewater management through the scheme and the limitations for developers to use private providers; and
- the limited ability for developers to influence and vary the scheme.

Meland provides the following detailed submission to the scheme and funding plan.

Staging and Out of Sequence Works

The 2600 allotments identified in Phase 0 and 1 for the Affected Area support two beneficiaries. This has implications for Meland whose relevant land interest is identified in Phase 2 of the proposed staging in the scheme.

We note that the SA Water advice was based on the following key assumptions:

This document provides an overview of the assessment for Phase 0 and Phase 1, that will service the first 2000 lots, based on the staging plan provided by the Concordia Infrastructure Scheme Co-ordinator.

Similarly, the AECOM Concordia Transport Infrastructure Strategy (TIS) has been based on a staging plan which shows the Meland holding, comprising a contiguous holding in the order of 110ha, identified as Stage 10 and 10a (the very last stages).

The TIS specifically states:

In summary:

- *Development is planned to commence on the parcels adjoining the Barossa Valley Way on both sides of Concordia Road, as well as a portion of the land fronting Calton Road south of the rail corridor;*
- *Development then broadly spreads to the north and west, towards the central Neighbourhood Activity Centre and the planned link road bridge over the North Para River to the Sturt Highway; and*
- *Land in the northeastern quadrant, along with a small number of other isolated parcels, will likely be released in the middle and towards the back end of the 25-year development timeframe.*

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:

- 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.

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.

The scheme does not provide a satisfactory mechanism for developers/landowners to accelerate or change the staging.

While the operating provision provide for out-of-sequence works, these works:

- are at the Scheme Coordinator's discretion;
- must not compromise network efficiency or broader staging;
- will only be considered if there are exceptional justifications, with no guidance provided on what 'exceptional justifications' might be considered/accepted; and
- may require developers/landowners to fund temporary works entirely at their cost with no guarantee of reimbursement from the scheme.

We further note that any changes to staging are likely to be opposed by other stakeholders (i.e. competing landowner/developers) which will mean that substantive variations to the scheme are highly unlikely.

This creates a high degree of uncertainty and disadvantages developers who may be ready to develop but fall outside of the sequencing identified in the staging. In summary, this outcome does not support houses getting built as quickly as possible, which is counter to the current government strategy.

Meland is wishing to develop as soon as possible, however by the time it was afforded a ‘seat at the table’ the staging and associated infrastructure planning was already settled. In essence the initial approach, established at the commencement of the process was flawed. As currently drafted the scheme provides numerous barriers to Meland developing their land within the next decade. On this basis, Meland does not support the scheme.

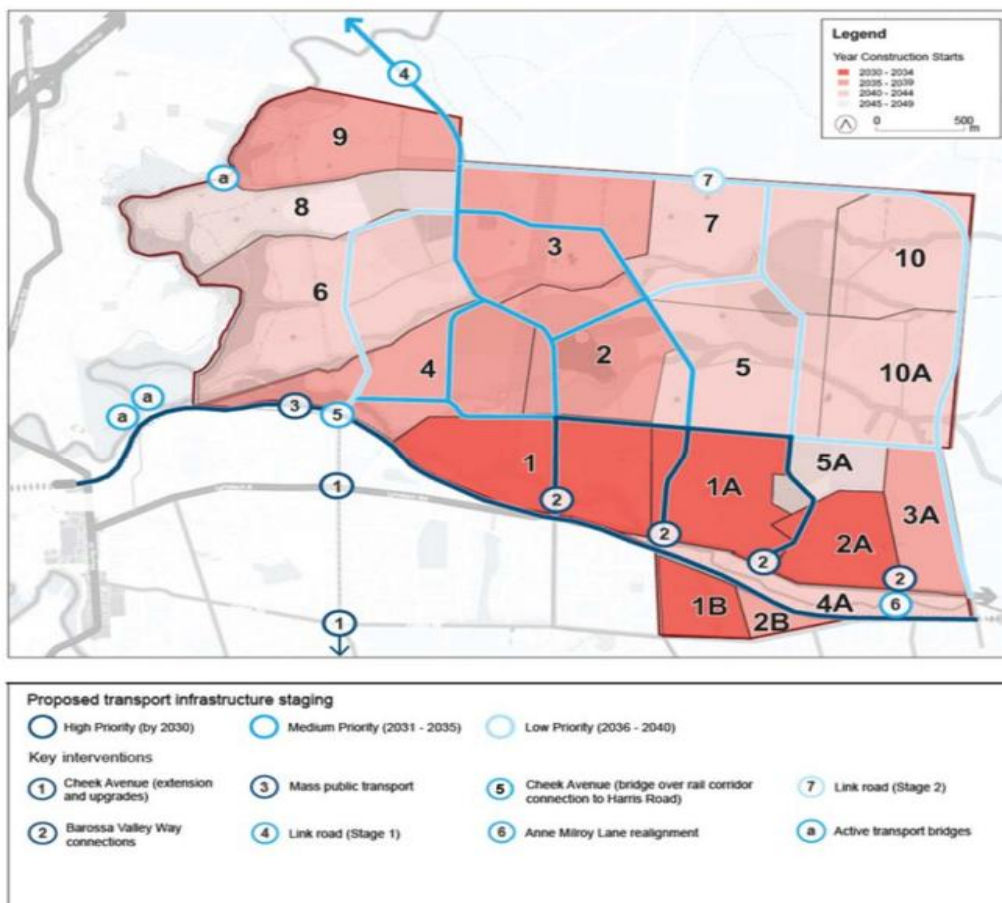
At the very least, Meland requests the opportunity to develop early in Phase 2, if not earlier should other landowners/developers not lodge land division applications within six months of scheme approval. Agency infrastructure planning and formal reviews of the scheme should have this position included as an underlying objective/assumption.

A solution to enabling development across more of the CGA is delivery of enabling infrastructure. In this regard, **the Stage 2 link road identified as 7 in Figure 2 below should be delivered sooner as it represents key infrastructure that would unlock Meland’s and other land in the CGA.** The link road is not currently scheduled for delivery until Phase 2, however if delivery of the link road was scheduled earlier it would create the potential to facilitate development of stages 3, 7, 5, 10 and 10A (as identified in Figure 2) and multiple growth fronts across the CGA.

Figure 2 *Transport Infrastructure Staging from page 82 of the Concordia Transport Infrastructure Strategy prepared by AECOM*

8.5.3 Proposed transport infrastructure staging

The proposed order and timing of the key infrastructure interventions (to ensure accessibility between Concordia and the surrounding network and trip destinations) are shown in Figure 66 and summarised in Table 19.



We note that the AECOM report suggests that there is an opportunity for the Link Road to be initially constructed as single carriageway providing one lane in each direction. We suggest that this approach be adopted to assist in facilitating the early delivery of this infrastructure.

Committed Funding and Infrastructure Delivery by the State

The funding plan states the following:

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.

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 broad benefit beyond the growth area, should ideally be funded by the State, and established as soon as practical.

[REDACTED] he 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. Further, it is evident that the committed State funding has been based on infrastructure costings which are not robust.

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.

There is an obligation on all parties to ensure that any State funding commitment derives maximum benefit in the delivery of a new urban community. With costings and associated assumptions only recently made available, there remains significant doubt that such has been achieved.

Road Costs

The costings set out in the funding plan for road infrastructure appear to be unresolved. Further modelling and detailed design are likely to be needed to ascertain more accurate (i.e. lower) costs. These costings require further resolution to ensure infrastructure scheme charges are reasonable and infrastructure is delivered in the most cost effective manner possible. This is also essential to provide certainty to developers about future charges under the scheme.

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.

If the scheme is approved in its current form, there should be a mechanism built in to provide a formal review to resolve road contribution costs within the first six months of the Scheme being approved.

Uncertainty and Cost Escalation

The absence of costings for Phase 2, unresolved traffic costings and risk of increasing costs is of concern to Meland, particularly as Meland would be prevented from commencing development and contributing to the scheme until Phase 2. Further potential cost increases under the scheme have been created in the recently adopted amendments to the *Planning, Development and Infrastructure Act 2016* ('PDI Act') and in particular the introduction of section 167A – Variation to basic infrastructure scheme to include primary infrastructure (social infrastructure). Both result in uncertainty around future contributions that may be required against the scheme and risk for future development, particularly for later phases of the CGA.

Further the scheme states:

In developing and administering the Charge relating to the development of the CGA, the Scheme Coordinator shall develop and implement a Funding Arrangement and Charge relating to development of land beyond Phase 1. This shall be undertaken no less than 24 months from the completion of Phase 1 or the creation of the 1800th allotment with the CGA, whichever shall occur first.

It is considered that the timeframe to provide the funding arrangement and charge beyond Phase 1 is excessive and uncertain, noting that developers in Phase 1 may choose not to develop land. In which case this trigger point may not be reached or may not be reached for a long time. Therefore, and 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.

Confirmation of whether there is an intention to build primary infrastructure into the Scheme at a later date is also requested.

Governance transparency is critical. The Scheme Co-ordinator should be required to publish all staging decisions and reasons for resequencing refusals. Developers/landowners should have the right to appeal staging or cost allocation disputes to an independent panel or the State Planning Commission. Additionally, provisions should allow multiple amendment requests where material circumstances change, such as government (State or Federal) infrastructure announcements or market shifts. Mechanisms to equalise costs and opportunities across all contributors must be embedded to prevent permanent disadvantage to any developer/landowner.

Waste Water Provider

As drafted, the scheme assumes SA Water will be the wastewater provider.

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. Private systems offer a fast-track solution to enable early development and respond to housing demand while long-term decentralised solutions are resolved. Integration protocols between private and SA Water infrastructure should be developed to ensure seamless transition and service reliability.

Ultimate integration of private and SA Water sewer infrastructure requires further examination, noting that private systems provide a fast-track wastewater management option to respond to the housing crisis and provide time to resolve an ultimate SA Water decentralisation solution to service the northern Adelaide growth areas.

Ability to Influence/Vary Schemes

Under the Operating Provisions, the Scheme Coordinator, appointed by the Chief Executive, has broad powers to prepare costings, determine works programs, administer charges and oversee delivery. Developers will be reliant on the Co-ordinator'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.

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.

Consideration should be given to increasing the flexibility or mechanisms within the scheme for developers/landowners to seek a review or variation to respond to changing circumstances.

System Improvement

Schemes are new to the State. As such careful monitoring and system improvement is critical to their ongoing success. 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.

Conclusion

To create a more equitable framework and reduce risk to landowners/developers the following amendments to the scheme are recommended:

- include objective criteria into Operating Provisions (e.g., demonstrated housing demand, anchor project delivery, or state priority investment);
- require the Scheme Co-ordinator to publish justifications for staging decisions and resequencing refusals;
- create a structured mechanism for developers to elect to fund earlier delivery (with binding rights to credits/reimbursement);
- fund and commit to the early delivery of the single lane link road to assist unlocking more development fronts within the growth area;
- allow developers to appeal staging/resequencing disputes to the State Planning Commission or an independent panel; and
- better acknowledge private wastewater solutions.

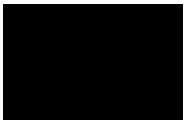
A contingency framework should be built into the scheme to address delays in Phase 0 and Phase 1. If development milestones are not met within agreed timeframes, enabling infrastructure such as the link road should be delivered earlier using State (or Federal) funds or developer contributions. This trigger-based approach will ensure continuity of development and reduce risk of prolonged stagnation. Further, the Scheme should:

- permit multiple amendment requests from developers/landowners where material circumstances change (e.g., government infrastructure announcement, market shifts);

- provisions to ensure no landowner is permanently disadvantaged by being “last-in-line”; and
- mechanisms to equalise costs and opportunities across all contributors.

Thank you for the opportunity to provide this submission. Please contact me on [REDACTED] should you have any questions regarding this submission.

Yours sincerely,



Michael Osborn
Director

From: [REDACTED]
To: [DHUD:PlanSA Submissions](#)
Subject: Concordia development
Date: Sunday, 16 November 2025 10:20:23 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

To the Minister, the Honourable Nick Champion,

As existing land owners at Kalbeeba we are very concerned with what is being proposed for our area, we know that all of this is in the best interest of the local Community & the state, however our little patch of paradise is going to be boxed in with so many more people, Traffic & other associated problems that com with urban infill & growth. We accept it is all inevitable, however, we do have concerns that if possible we would like addressed as follows.

1. We would like to see a Bridge built over the river by the Mitigation Dam to allow access to the Main Highway, There seems to be a large amount of Excess Concrete on the South West side of the Dam so as to use this as a Footing to build a Bridge over the River. It would be good to see this Investigated.
2. We would like to see a Roundabout at the Intersection of Concordia road & Sunnydale ave. There is enough land there to achieve this.
3. There will be inevitably a lot more traffic using Sunnydale & there needs to be a proper Foot Path installed along this road. I always see people walking on the road now.
4. I think we need to see the Speed limit dropped from the Overtaking laneon Barossa Way back to Cheek Ave to 60ks per hr.
5. As the first part of the development will probably start behind our property being situated at [REDACTED], We would like to see a Buffer Zone between the new development & the Rail corridor, with possibly an Extensive Tree planting & a perhaps a Reserve area.

Kind Regards

Mick Mckell

From: [GICU, DHUD \(DHUD\)](#)
To: [Goodchild, Martin \(DHUD\)](#); [Gill, Cherie \(DHUD\)](#)
Cc: [Perkins, Alison \(DHUD\)](#); [McPhillips, Iain \(DHUD\)](#)
Subject: FW: Concordia
Date: Thursday, 27 November 2025 10:34:19 AM

OFFICIAL: Sensitive

Hi all,

Feedback from our shared inbox as below for registering/action.

Kind regards,
Adam

Adam Squires
Acting Director
Growth & Infrastructure Coordination Unit (GICU)

From: [REDACTED] >
Sent: Tuesday, 4 November 2025 1:12 PM
To: GICU, DHUD (DHUD) <DHUD.GICU@sa.gov.au>
Subject: Concordia

You don't often get email from [REDACTED]. [Learn why this is important](#)

I would just like to give my opinion as a rate payer. I would like to see a Buffer zone behind us with Trees planted between the new development & the Rail corridor / path. Perhaps a reserve would be appropriate.

Regards

Mick McKell [REDACTED]

From: [REDACTED]
To: [DHUD:PlanSA Submissions](#)
Subject: Submission - Concordia Code Amendment
Date: Wednesday, 1 October 2025 12:39:27 PM

Thank you for the opportunity to comment

It is important to understand that there is a need for public transport to be considered in all SA development and follow Western Australia's example where road and rail transport use the same corridors and that the Shopping Centres, Schools, Police Stations, Government Services, Hospitals etcetera are built around this hub with adequate planned parking to meet the needs of these services. All developers should provide appropriate funding for this to occur rather than hotch pot inclusions and add Ons.

Don't just plan for now plan for the future as in many cases you only get one chance and I noticed telecommunication hasn't been mentioned in the infrastructure plan.

There is a need to know on how this development will affect surrounding development and link to existing infrastructure and facilities and how the community will access the centre of Adelaide IE. for major events such as AFL, Cricket and festivals without causing major transport problems. No one wants another Mt Barker

Cheers Clarry Fisher