





## ACKNOWLEDGEMENT TO COUNTRY

*Ekistics respectfully acknowledges the traditional owners and custodians of the land on which we work and we pay our respects to Elders past and present.*

## PROPRIETARY INFORMATION STATEMENT

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Revision	Description	Author	Date
Draft	Draft Planning Statement	JB	August 2025
V2	Draft Planning Statement	CO	27 November 2025
V3	Review Draft Planning Statement	BS	1 December 2025
V4	Final Planning Statement	CO	17 December 2025

## CONTENTS

1. EXECUTIVE SUMMARY	5
2. INTRODUCTION	7
3. BACKGROUND	8
4. SITE & LOCALITY	10
5. PROPOSED DEVELOPMENT	17
6. PROCEDURAL MATTERS	34
7. CODE ASSESSMENT	36
8. SUMMARY & CONCLUSION	50

## APPENDICES

1. CERTIFICATE OF TITLE	
2. ARCHITECTURAL PLANS	
3. LANDSCAPE MASTER PLAN	
4. SERVICES ASSESSMENT REPORT	
5. STORMWATER MANAGEMENT PLAN	



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6. TRANSPORT IMPACT ASSESSMENT

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7. NATIVE VEGETATION DATA REPORT

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8. PRELIMINARY SITE INVESTIGATION

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9. ARBORICULTURAL ASSESSMENT

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# 1. EXECUTIVE SUMMARY

Category	Details
PROJECT	Encounter Bay Residential Park
APPLICANT	Hometown Australia
ADDRESS OF SITE	Lot 10 Tabernacle Road, Encounter Bay
FIRST NATIONS COUNTRY	Ngarrindjeri
CERTIFICATES OF TITLE	Certificate of Title Volume 6322 Folio 65 (D138997AL10)
ALLOTMENT AREA	Approximately 12.98 ha
ALLOTMENT FRONTAGE/S	348.45m to Tabernacle Road (primary frontage), 99.04m to Bay Road, 92.28m to Mill Road & 235.96m to Waitpinga Road (secondary frontages)
LOCAL GOVERNMENT	City of Victor Harbor
RELEVANT AUTHORITY	Victor Harbor Assessment Manager or Fleurieu Regional Assessment Panel as per Sections 93(1)(c) or 96 of the PDI Act.
PLANNING AND DESIGN CODE	Version 2025.21 (Published on 4 December 2025)
ZONE	Hills Neighbourhood Zone
OVERLAYS	<ul style="list-style-type: none"> <li>• Affordable Housing</li> <li>• Hazards (Bushfire - Medium Risk)</li> <li>• Hazards (Flooding - Evidence Required)</li> <li>• Native Vegetation</li> <li>• Prescribed Water Resources Area</li> <li>• Water Resources</li> </ul>
TECHNICAL & NUMERIC VARIATIONS (TNVs)	<ul style="list-style-type: none"> <li>• Maximum Building Height (Metres) (<i>Maximum building height is 9m</i>);</li> <li>• Maximum Building Height (Levels) (<i>Maximum building height is 2 levels</i>);</li> <li>• Gradient Minimum Frontage (Detached) (<i>Minimum frontage for detached dwellings .... is 15m</i>);</li> </ul>

Category	Details		
	<ul style="list-style-type: none"> <li>Gradient Minimum Site Area (Detached) (<i>Minimum site area for detached dwellings ....is 560sqm</i>).</li> </ul>		
EXISTING USE	Vacant farmland (approved residential allotments)		
PROPOSAL DESCRIPTION	Change of use to 'residential park' comprising 267 dwelling sites with associated community and recreational facilities (Including an indoor swimming pool), sales office, display homes and construction of ancillary retaining walls, fencing, earthworks and private roads.		
CLASSIFICATION OF DEVELOPMENT	Residential park		
	Dwellings		
	Community and recreation facilities	Residential park	Code Assessed- Performance Assessed
	Manager's office		
	Maintenance and hobby shed	Outbuilding	Code Assessed- Performance Assessed
	Swimming pool		Code Assessed- Performance Assessed
	Sales office and display homes		Code Assessed- Performance Assessed
	Earthworks, retaining walls and fencing		Code Assessed- Performance Assessed
PUBLIC NOTIFICATION	Subject to public notification		
REFERRALS	Native Vegetation Council		
APPLICANT	Hometown Communities		
CONTACT PERSON	Catherine Orford – Senior Associate		
OUR REFERENCE	02021-002		

## 2. INTRODUCTION

This planning statement has been prepared in support of a development application by Hometown Australia ('the applicant') to establish a residential park on land located on Lot 10 (DP 138997) Tabernacle Road, Encounter Bay (the 'subject site').

This planning statement provides information about the subject site and proposed development. The planning statement will address the merits of the development application against the relevant provisions of the Planning and Design Code (Version 2025.21 – dated 4 December 2025).

References in this statement to legislation are abbreviated as follows: *Planning, Development and Infrastructure Act 2016* ('PDI Act'), *Planning, Development and Infrastructure (General) Regulations 2017* ('PDI Regulations'), and the *Planning and Design Code* ('the Code').

This Planning Statement has been informed by the following plans and supporting documentation:

- Appendix 1: Certificate of Title;
- Appendix 2: Architectural Plans (Aube);
- Appendix 3: Landscape Master Plan (Studio 151);
- Appendix 4: Services Assessment Report (Fyfe);
- Appendix 5: Stormwater Management Plan (Fyfe);
- Appendix 6: Transport Impact Assessment (ETA);
- Appendix 7: Native Vegetation Data Report (Jeremy Ross-Carter);
- Appendix 8: Preliminary Site Investigation (Fyfe); and
- Appendix 9: Arboricultural Assessment (Arborman).



### 3. BACKGROUND

Hometown Australia (HTA) is the largest owner and operator of residential land lease communities ('residential parks') across Australia, with a portfolio of over 60 communities nationally and 10,000 dwelling sites under management across four states. In South Australia, HTA owns and operates Rosetta Village in Victor Harbor and Seachange Village in Goolwa, both of which are well-established and highly regarded within the region. Seachange Village is currently being expanded to include an additional 181 dwellings and new communal facilities.

HTA communities primarily cater for residents aged over 50 who are downsizing from larger family homes, and are seeking independent living in a low maintenance, lifestyle focused environment. Residents tend to be physically and socially active, taking advantage of communal amenities such as a resident clubhouse, swimming pool, bowling green, pickle ball and gym. Architecturally designed homes provide low-maintenance, flexible and easy living.

HTA communities operate as residential land lease communities (LLCs). This category of home ownership is financially appealing to many downsizers, due to the clear financial structure, simple contracts, and the security of homeownership.

Homeowners own the dwelling that they live in and have a lease over the land on which it stands, providing security of tenure. HTA does not charge entry and exit fees, or other costs often associated with other retirement living options. With homes starting below the median house price across most HTA locations, our communities offer an attainable housing option and create housing choice in local markets.

The key drivers for land lease communities are:

- Affordability Gap: Rising house prices have made traditional homeownership unattainable for many retirees and downsizers.
- Demographic Shifts: Australia's population aged 55+ is growing rapidly, particularly in coastal and regional areas.
- Government Support: Rent assistance may apply to land lease residents, improving affordability.
- Lifestyle Appeal: Secure communities with amenities (e.g., clubhouses, pools, bowling greens) offer a social, secure lifestyle.

The subject site at Encounter Bay was recently acquired by HTA (via Encounter Bay RLLC Pty Ltd) with the intent to deliver a new Residential Park development. The project represents a strategic expansion of HTA's footprint in the Fleurieu Peninsula, responding to growing demand for attainable, age-friendly housing options in proximity to established services and coastal amenities. HTA purchased the entire land holding bound by Tabernacle Road to the east, Waitpinga Road to the north and Whalers Road to the west. A recent boundary realignment (DA 25015568) created the subject land (Lot 10) that is the subject of this application. The balance of the land (Lot 11, of more than 20 hectares) is the subject of a separate land division application by Civecon.

Importantly, the broader land holding (Lots 10 and 11) benefit from an existing land division approval (Ref: 453/D047/10), which authorises the creation of 380 residential allotments, roads, and public open space. This approval remains valid until 12 February 2030 and provides a strong planning foundation for the proposed development.

The location of the proposed Residential Park offers a range of lifestyle and environmental benefits that align with HTA's community values. Situated in a clean, natural setting with access to nearby beaches and the ocean, the site provides a



tranquil and picturesque environment ideal for over-50s living. Its proximity to Victor Harbor ensures access to essential services, while the surrounding landscape supports a small-town quality of life that fosters community connection, wellbeing, and a slower pace of living. These attributes make Encounter Bay a highly desirable location for a new Residential Park, offering both amenity and lifestyle appeal.

HTA's development model is underpinned by the principles of affordability, community, and quality. The proposed Residential Park will be operated under the *Residential Parks Act 2007*, offering long-term rental agreements within a managed community setting. HTA's commitment to delivering high-quality, well-serviced environments for over-50s is reflected in its national reputation and the success of its existing communities.

## 4. SITE & LOCALITY

### 4.1. Site

The subject site ('the site') is located to the west of Tabernacle Road in Encounter Bay, within the City of Victor Harbor (**Figure 4-1**). It comprises a single contiguous land parcels formally described as Certificate of Title Volume 6322 Folio 65 (Lot 10 in DP138997).

The site is free of any easements or encumbrances that would affect its development potential (refer to **Appendix 1**).

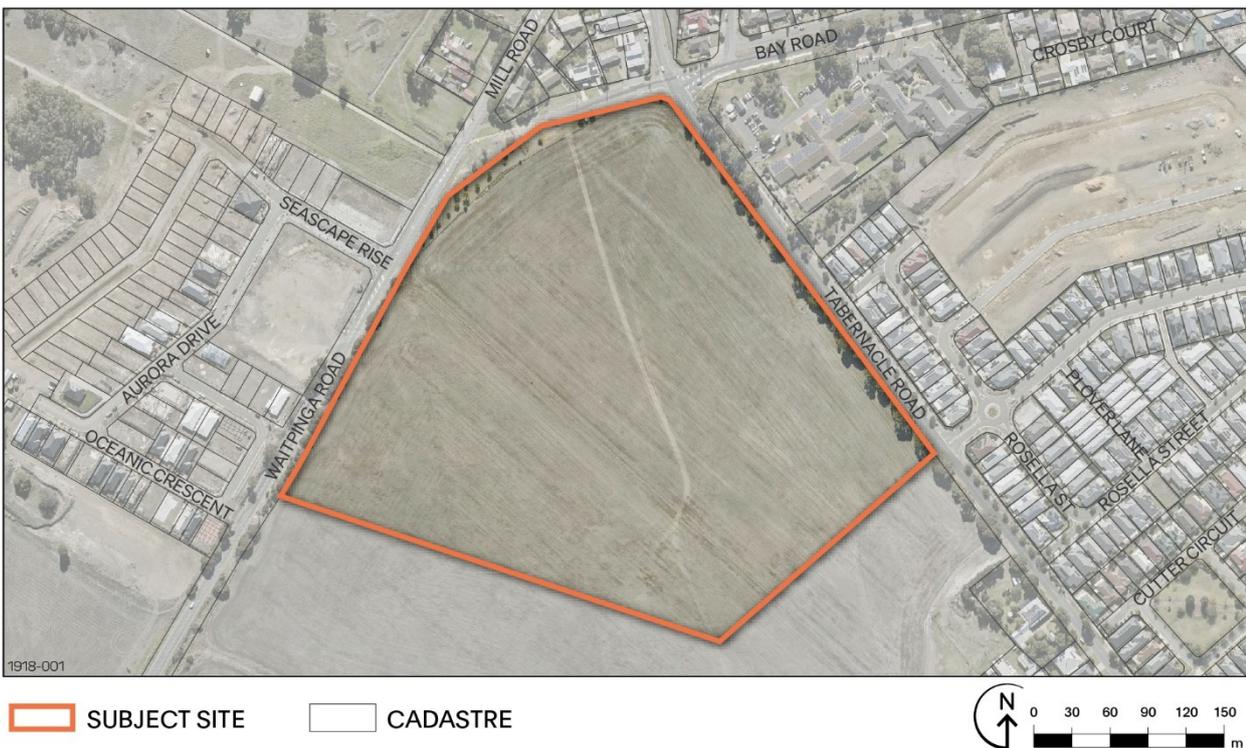


Figure 4-1: Site and surrounds (Graphica)

The site has a total area of 12.98 hectares and is currently vacant, with a history of agricultural uses. It features undulating topography (**Figure 4-2**) providing opportunities for a varied and responsive layout that takes advantage of scenic views towards The Bluff. The site is largely cleared of vegetation, with only scattered trees and low-lying vegetation along sections of the boundaries, as indicated in **Figure 4-3**. The site's primary frontage to Tabernacle Road is defined by a row of mature trees contributing to the visual character of the streetscape. The majority of these trees are 'street trees', located within the road reserve.

The site benefits from secondary road frontages to Waitpinga Road, Mill Road and Bay Road, which along with Tabernacle Road, are local roads under the care and control of the City of Victor Harbor. These frontages provide excellent access and flexibility for future development staging and servicing. Waitpinga Road serves as a key connector, linking the site to the

surrounding suburbs of Encounter Bay and Waitpinga, and extending westward to Cape Jervis. This corridor plays an important role in connecting the southern coastal towns of the Fleurieu Peninsula and is a local freight route.

The site proposed for the Residential Park is located in close proximity to existing established residential areas, including HTA's Rosetta Village to the north-east of the site. This location offers a logical and well-connected extension of the existing urban footprint, enabling access to local services and infrastructure.

The location of the site supports the expansion of Victor Harbor by positioning new growth in proximity to existing residential areas, community infrastructure and transport routes.

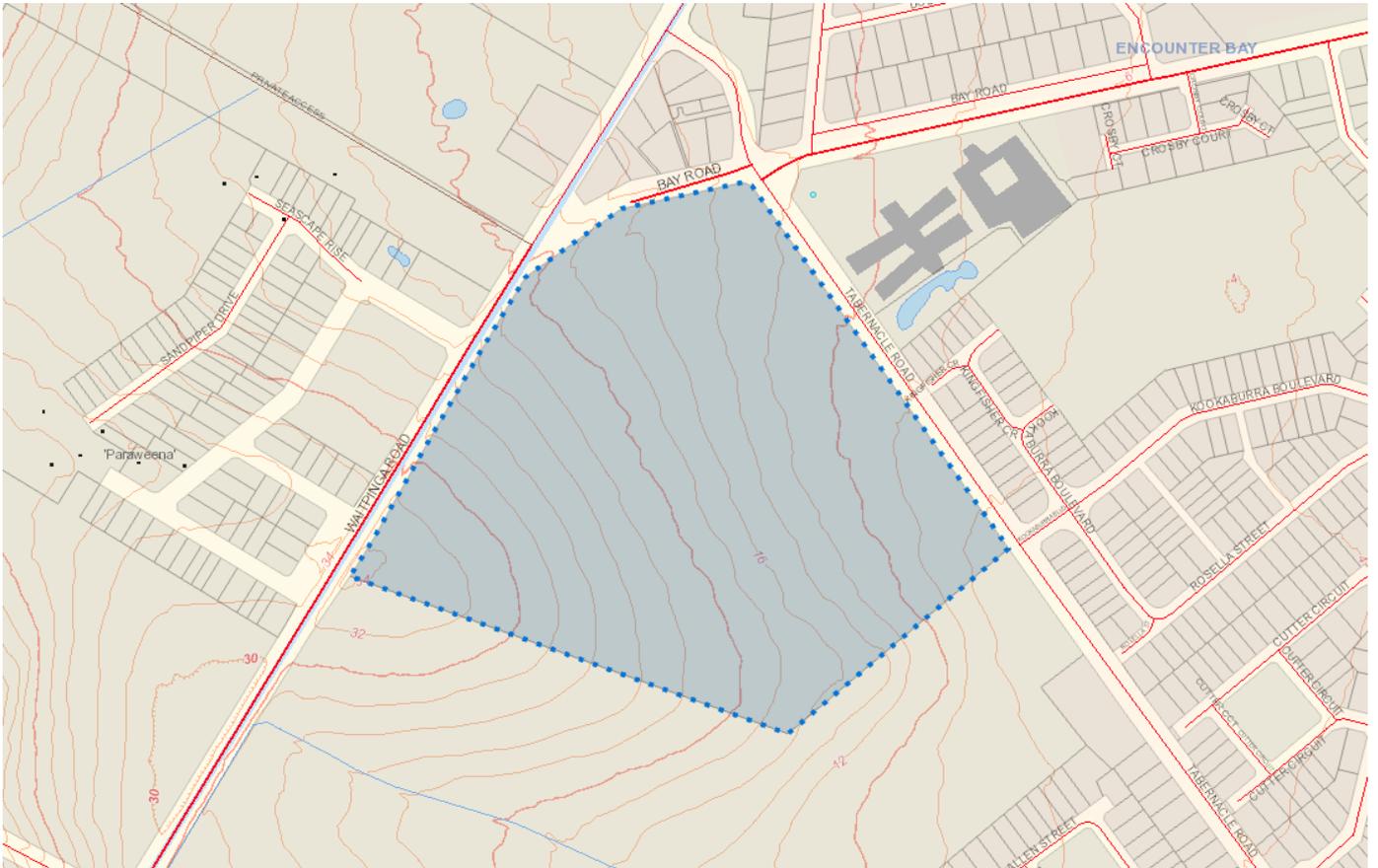


Figure 4-2: Site contours (SAPPA)

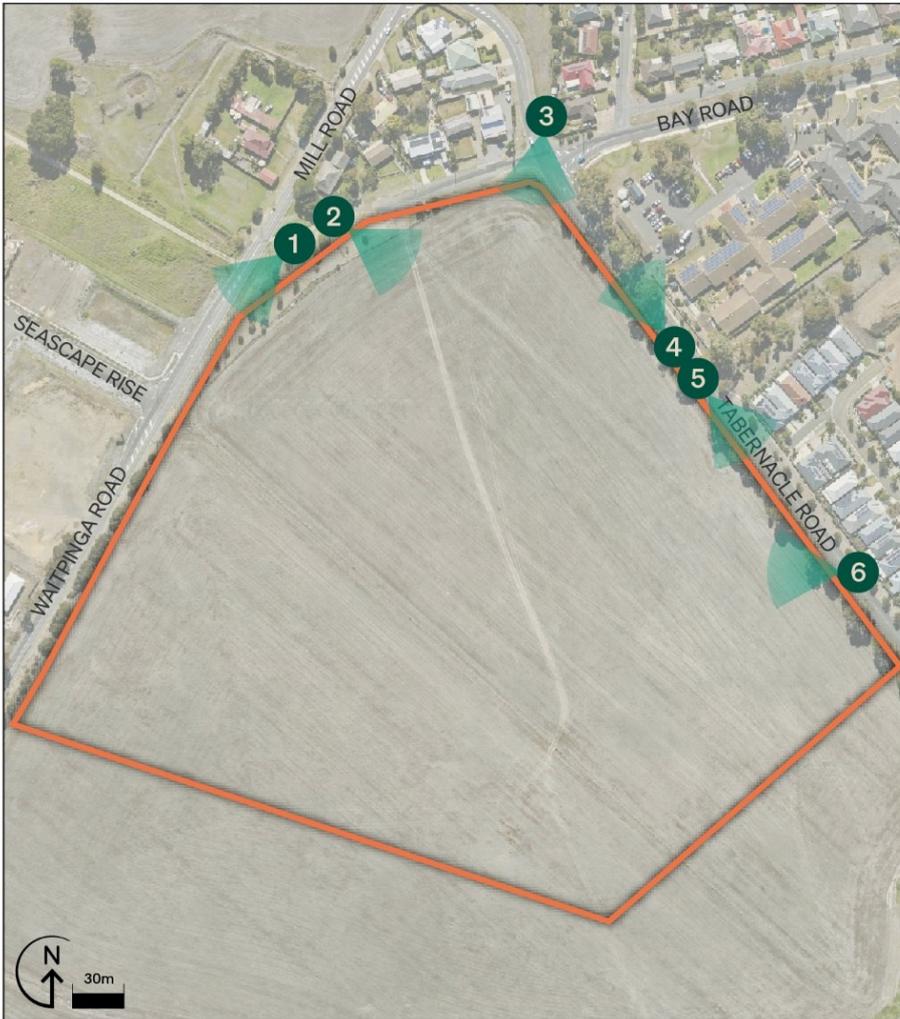


Figure 4-3: Site photographs (Graphica)

## 4.2. Locality

The locality surrounding the subject land is experiencing a period of significant transformation, transitioning from its traditional rural character to a more urbanised form. This change is being driven by a series of recently and emerging developments, including approved residential developments within close proximity to the site. These developments introduce a more compact and diverse housing pattern, supported by new infrastructure and community facilities, and signal a broader trend toward urbanisation of Encounter Bay and Waitpinga, in line with Victor Harbor's Urban Growth Management Strategy 2025 (UGMS) which promotes sustainable growth in areas well-connected to existing services and transport corridors. As a result, the subject site is positioned within a locality that is evolving, with new residential estates introducing a more contemporary housing pattern alongside existing rural holdings further north-west and north of the site.

Adjoining the site to the west, on the opposite side of Waitpinga Road, is a residential subdivision under construction ('Seascape' by Civecon) comprising predominantly detached dwellings on 300-600m<sup>2</sup> allotments. An activity centre is earmarked for Lots 1 and 2 Mill Road as part of the Seascape development, which will sit directly opposite the site, providing future convenient access to service for residents of the proposed development.

To the southwest of Seascape is a recently approved residential park (Ocean View), located on the corner of Waitpinga Road and Tugwell Road. The approved development comprises approximately 320 dwelling sites along with community and recreational facilities. Both Seascape and Ocean View are located in the Master Planned Neighbourhood Zone.

Seascape and Ocean View both have significantly undulating topography as illustrated in *Error! Reference source not found.*, with portions of Ocean View, particularly towards the Tugwell Road frontage, significantly steeper than the subject site.

To the south of the subject site (comprising Lot 11 - part of the broader Hometown Australia land holding) is earmarked for conventional residential development, with a Development Application recently lodged for a land division creating 320 allotments, roads and public open space. At the time of writing, the land division application was under assessment by the City of Victor Harbor.

Land directly north of the site, on the opposite side of Bay Road (a cul-de-sac terminating at Mill Road) comprises one and two storey detached dwellings, including a Local Heritage Place on the corner of Bay Road and Mill Road.

To the east of the site, on the opposite side of Tabernacle Road, the locality includes an Estia Health Aged Care Home ('supported accommodation'), with carparking accessed from Tabernacle Road. To the south of Estia Health is an emerging residential estate ('Oakford Estate'), supporting generally low rise, compact housing (lots around 300m<sup>2</sup>), indicative of a shift toward higher-density housing in the locality.

The broader locality south of the site comprises the established Encounter Bay residential area, predominantly made up of one and two storey detached dwellings on allotments of varied shapes and sizes.

Allotments further to the west of the site (across Whalers Road) generally consist of larger residential rural lifestyle holdings with a semi-rural character, typically including detached dwellings on sites ranging from one to two hectares.



Figure 4-4 Tabernacle Road looking north-west to the Bay Road intersection (Estia Health opposite)



Figure 4-5 Tabernacle Road/Bay Road intersection



Figure 4-6 Tabernacle Road Entrance to Oakford Estate



Figure 4-7 Waitpinga Road looking south, Seascape opposite



Figure 4-8 Approved Ocean View Residential Park site



Figure 4-9 Rural lifestyle properties to the south-west (Google Streetview)

## 5. PROPOSED DEVELOPMENT

### 5.1. Overview

The applicant proposes the construction of a Residential Park and associated works that will comprise the following:

- Creation of 267 dwelling sites (including six display homes). Hometown Australia will construct dwellings on the 'sites', with residents able to select from a range of housing typologies. The final design and plans for each dwelling will be provided at the Building Consent stages, but notwithstanding, Hometown has provided a selection of seven (7) different type of dwelling designs from which future residents can select their homes (**Figure 5-1**);

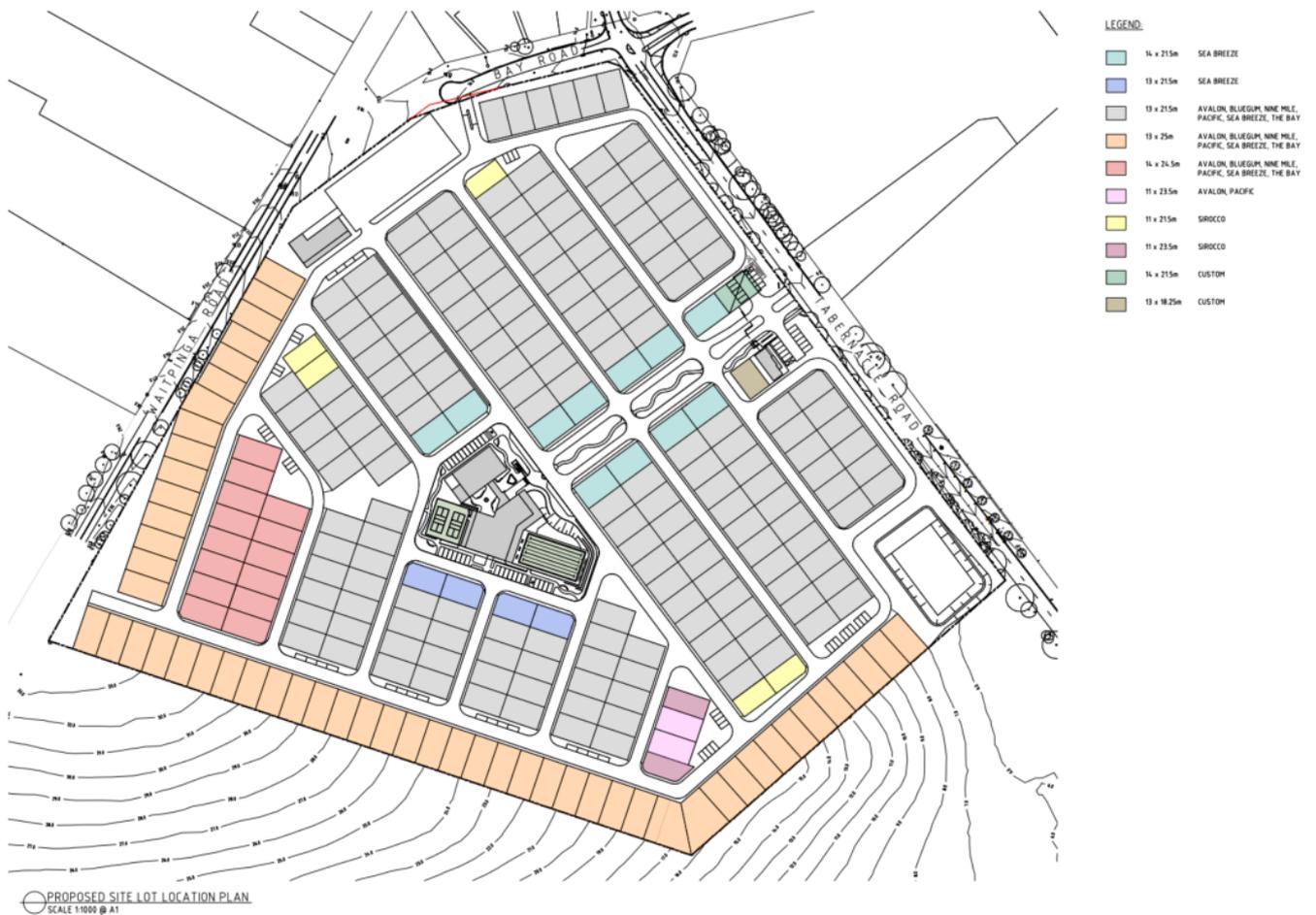


Figure 5-1: Site layout and dwelling/lot typologies (Aube)

- The proposal will be developed in three (3) stages (**Figure 5-2**):
  - Stage 1 (generally adjacent to Tabernacle Road) - dwelling sites, display village, sales office, manager’s office, visitor parking, entrance from Tabernacle Road, communal indoor and outdoor recreational facilities, biobasin,;
  - Stage 2 (southern portion of the site) - dwelling sites; and
  - Stage 3 (area adjacent to Bay Road) - dwelling sites, maintenance shed, RV parking area and Bay Rd access.

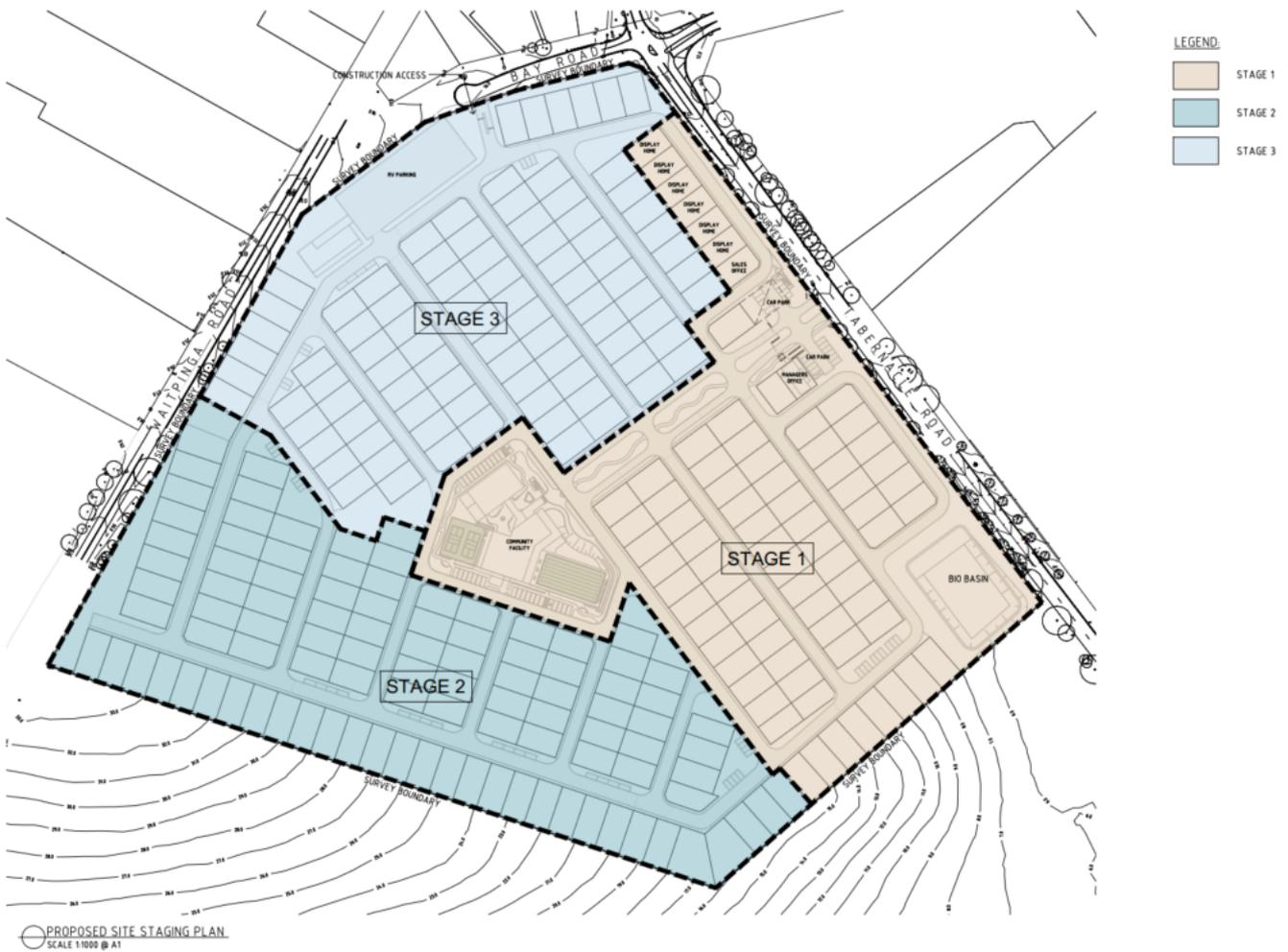


Figure 5-2 Staging Plan (Aube)

- Ancillary indoor and outdoor recreational facilities that will be available for use by all residents and their visitors (**Figures 5-3 & 5-4**), including:
  - A two-storey centrally located clubhouse/community facility, including a sports bar, gym, golf simulator, cinema, multi-purpose room and amenities at ground level, and a lounge, kitchen and bar, dining area and amenities at first floor level.

All facilities are ancillary and provided for residents as part of their site fees, The facilities are not commercially operated or leased to third parties;

- An indoor swimming pool with pool equipment and changing facilities, with covered connection to the ground level of the community facility;
- Lawn bowling green;
- Pickleball courts;
- Covered outdoor seating areas;
- Outdoor landscaped areas;
- Dedicated parking spaces and linked pedestrian paths.

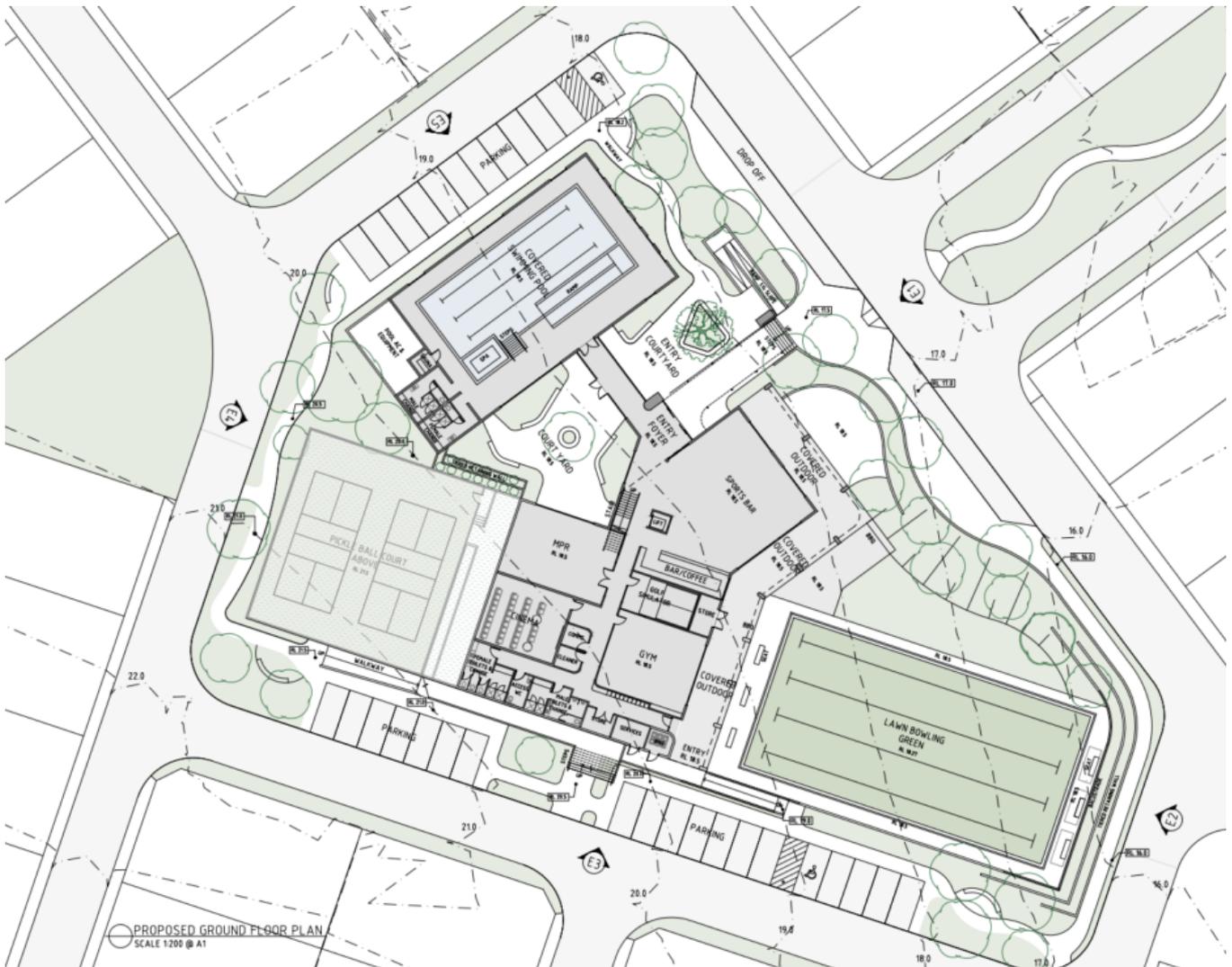


Figure 5-3: Proposed Clubhouse and Recreation Facilities site plan (Aube)



⊖ MAIN ENTRY & MAIN CLUBHOUSE



⊖ INDOOR POOL



⊖ MAIN CLUBHOUSE



⊖ REAR ENTRY



⊖ INDOOR POOL



⊖ PICKLE BALL COURT



⊖ ENTRY COURTYARD



⊖ INTERNAL COURTYARD

Figure 5-4 Concept renders of communal buildings (Aube)



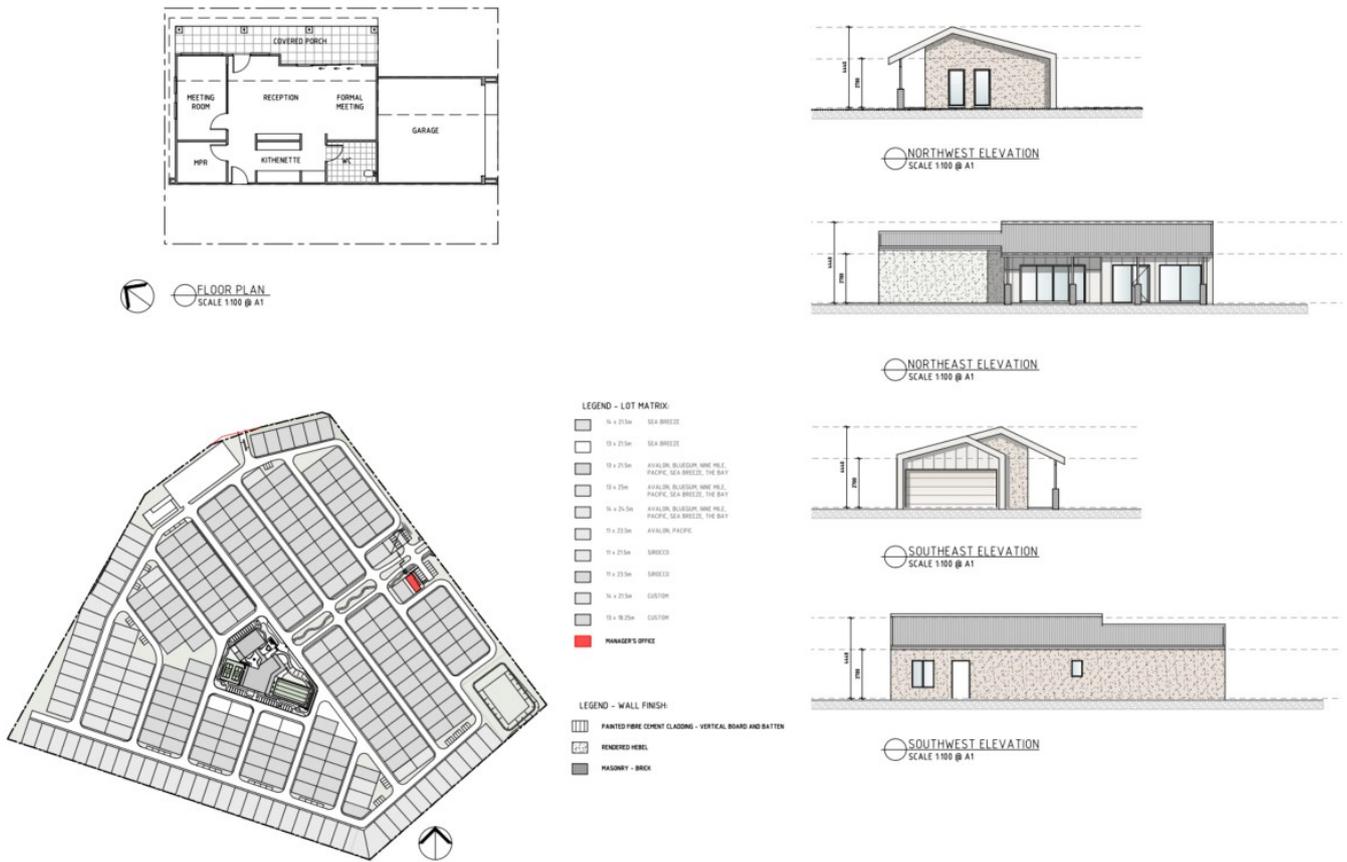


Figure 5-6 Community Manager's office (Aube)

- A sales office and six (6) display homes are located in the northern part of the site adjacent to the main entrance from Tabernacle Road, with ancillary visitor car parking. The sales office and display homes will be temporary, only being required during the sales period of the development, and will ultimately be sold as dwellings for future residents at the completion of development;
- Construction of private roads and footpaths throughout the residential park, providing access for residents and vehicles. The primary entrance to the site is located centrally from the Tabernacle Road frontage and notably, an internal service road is provided adjacent to Tabernacle Road so that no dwelling sites will have direct access to Tabernacle Road, and existing street trees are retained. Off-street parking is provided throughout the village for guests and visitors, with parking also located at the entrance adjacent to the sales office, and on the southern side of the clubhouse. Each dwelling has been designed to provide a double garage;
- Dedicated RV and caravan parking area in the northern part of the site adjacent to Bay Road/Mill Road. Access for RVs and emergency vehicles is provided to Bay Road. This secondary entrance will be secured and accessible only by residents and in the event of an emergency; and
- A combination of earthworks, retaining walls and fencing as required to secure the site and provide appropriate benched levels for dwelling site parcels to be developed (described in **Section 5.4**).

## 5.2. Traffic & Parking

A traffic report prepared by ETA accompanies the application and is provided in **Appendix 6**.

The following key aspects of the road layout and traffic strategy is as follows:

- Primary road access and egress is proposed to be Tabernacle Road;
- Secondary road access and egress is proposed via Bay Road. This access is largely for RV's and caravans utilising the dedicated parking area, and acts as a secondary fire access and access for residents. The access will be gated, open during the day and locked at night, with residents provided with a key or access fob;
- The private road network will comprise a combination of 6 m and 7 m wide roads. A 7 m wide section is for key perimeter and internal roads and 6 m wide section is for the remainder of roads;
- Roads will comprise kerb and water table on both side;
- Internal road grades vary between 0.5% and 8%; and
- Maximum grade of driveway between kerb and garage is 5%.

As noted, the Bay Road entrance will be secured, and will only be used by residents accessing the RV/caravan parking area, or by emergency vehicles.

Dedicated visitor parking areas have been provided throughout the development, on the outer roads and in association with the community centre. A total of 96 visitor parking spaces is provided, along with 530 resident parking spaces. The majority of dwellings are provided with double garages.

A network of footpaths is provided throughout the site, connecting Tabernacle Road, through the central spine to the clubhouse, and west towards Waitpinga Road. Pedestrian access through the Bay Road entrance will enable residents to walk to the future activity centre as part of the adjoining Seascape development, noting that a footpath on the northern side of Bay Road was under construction at the time of writing. Low traffic volumes and speeds within the internal private roads enable pedestrians and vehicles to share the carriageway.

Information provided by Hometown Australia (based on surveys of their existing communities) indicates that the majority of households are retired and have one vehicle per dwelling and make significantly fewer trips during peak periods. Residents also have access to a community van that can be used for group social outings, shopping and events. In assessing the proposal, ETA has provided a conservative assessment of traffic generation based on the NSW "Guide to Transport Impact Assessment", concluding that anticipated traffic volumes remain well within the capacity of the adjoining road network, and no intersection upgrades or treatments are required.

## 5.3. Landscaping & Trees

The proposal is accompanied by a Landscape Master Plan prepared by Studio 151 (**Appendix 3**). The landscape design for the Encounter Bay Residential Park aims to create a high-quality, visually appealing environment that fosters a sense of

refuge, community, and connection to nature. The overarching vision is to deliver outdoor spaces that are functional, inclusive, and sustainable, while complementing the coastal character of Encounter Bay and the Hills Neighbourhood Zone objectives.

Key Features of the Landscape Design are described below:

- **Entry Statement:**

The main entry along Tabernacle Road will feature wide mass-planted areas with medium and large native trees, complemented by native palms and stone-clad entry walls. Coloured concrete treatments will break up hard surfaces, creating an inviting and distinctive sense of arrival.

- **Community Centre Precinct:**

Surrounding the clubhouse and indoor pool, the landscape will form a lush oasis with structured planting, shade trees, and feature shrubs. Outdoor amenities include a bowling green, pickleball courts, fire pit lounge, and BBQ areas, all integrated with seating nodes and pathways. Planting will soften built form and disguise tiered retaining walls, ensuring visual harmony.

- **Green Spine and Pocket Parks:**

A central landscaped spine will connect the main entry to the community centre, incorporating canopy trees, pedestrian paths, and mass planting for shade and amenity. Multiple pocket parks distributed throughout the site will provide informal gathering spaces, picnic shelters, and working gardens, encouraging social interaction and active lifestyles.

- **Boundary Treatments and Screening:**

Generous landscaped setbacks along Tabernacle and Waitpinga Roads will include structured buffer planting of low-maintenance native species to provide privacy, visual screening, and a green interface with the public realm. Existing verge trees will be retained to maintain local character.

- **Planting Palette:**

The design prioritises native and endemic species such as *Acacia melanoxylon*, *Eucalyptus leucoxyton*, *Banksia marginata*, and *Lomandra longifolia*, complemented by accent plants like Gynea lilies and grass trees. This approach enhances biodiversity, supports local fauna, and aligns with Water Sensitive Urban Design principles.

- **Internal street planting:**

Internal road will provide landscape frontages to each dwelling with street trees to provide shade, visual amenity and outlook, and break up the built form.



Figure 5-7 Proposed Landscape Concept Plan (Studio 151)

As described, Tabernacle Road is lined with mature trees, creating a distinctive gateway to Encounter Bay and high level of visual amenity, with the majority of these trees being located in the road reserve (street trees). These trees have been assessed by Arborman in the accompanying Arboricultural Assessment (**Appendix 9**) in the context of the proposed development. The proposed site layout and siteworks have been carefully developed to retain these trees and minimise the potential for tree damage, with the Arborman report concluding that only one (1) tree will be adversely impacted by the proposed works (identified as Tree 28 in the report, a Eucalyptus Playtpus). This tree is proposed to be removed to facilitate the proposed vehicle entrance from Tabernacle Road, and all remaining trees will be retained and protected. It is noted that the removal of Tree 28 is not ‘tree damaging activity’ requiring Development Approval, as the Regulated and Significant Tree Overlay does not apply, and the tree is not ‘native vegetation’.

A small stand of nine (9) immature River Red Gum trees located within the site boundary along Tabernacle Road, identified as ‘native vegetation’ are proposed to be removed (**Figure 5-8**), assessed as ‘Level 3’ clearance. These trees are likely to have seeded from mature planted trees. A Native Vegetation Clearance Data Report (**Appendix 7**) prepared by Jeremy Ross-Carter has been submitted to the Native Vegetation Council (NVC) for approval, however as the clearance is ‘Level 3’ it is expected that the Development Application will require referral to the NVC.



Figure 5-8 Proposed clearance (Jeremy Ross-Carter)

## 5.4. Stormwater Management

A Stormwater Management Plan was prepared by Fyfe and is provided in **Appendix 5**.

Key features of the proposed stormwater system are summarised below:

- Two discharged points are proposed on Tabernacle Road, one discharging directly into the road reserve, and the other connecting to the proposed detention basin to the southeast corner of the site;
- Minor stormwater runoff from the site is to be conveyed via pit/pipe system towards the proposed detention basin and pipe outlet to Tabernacle Road;
- Major storm (1% AEP) runoff from the northern corner and northwest boundary of the site is to be discharged directly to Tabernacle Road, while the majority of flow from the remaining of the site is to be conveyed into the proposed detention basin and discharged through the pipe outlet to Tabernacle Road, as illustrated in **Figure 5-9** below. No inundation to allotments is expected;
- Open space is to be located throughout the site to assist in stormwater drainage via natural infiltration;
- Extension of the nearby 750mm pipe south of the site to connect to the proposed drainage network of the site;
- A detention basin is proposed in the eastern corner of the site to restrict post-development flow to pre-development scenario;

- A gross pollutant trap and a bioretention basin to assist in treating and maintaining the stormwater runoff quality; and
- Rainwater tanks of 1kL per allotment will be provided to assist with stormwater management and allow reuse of rainwater in toilets and laundry outlets.

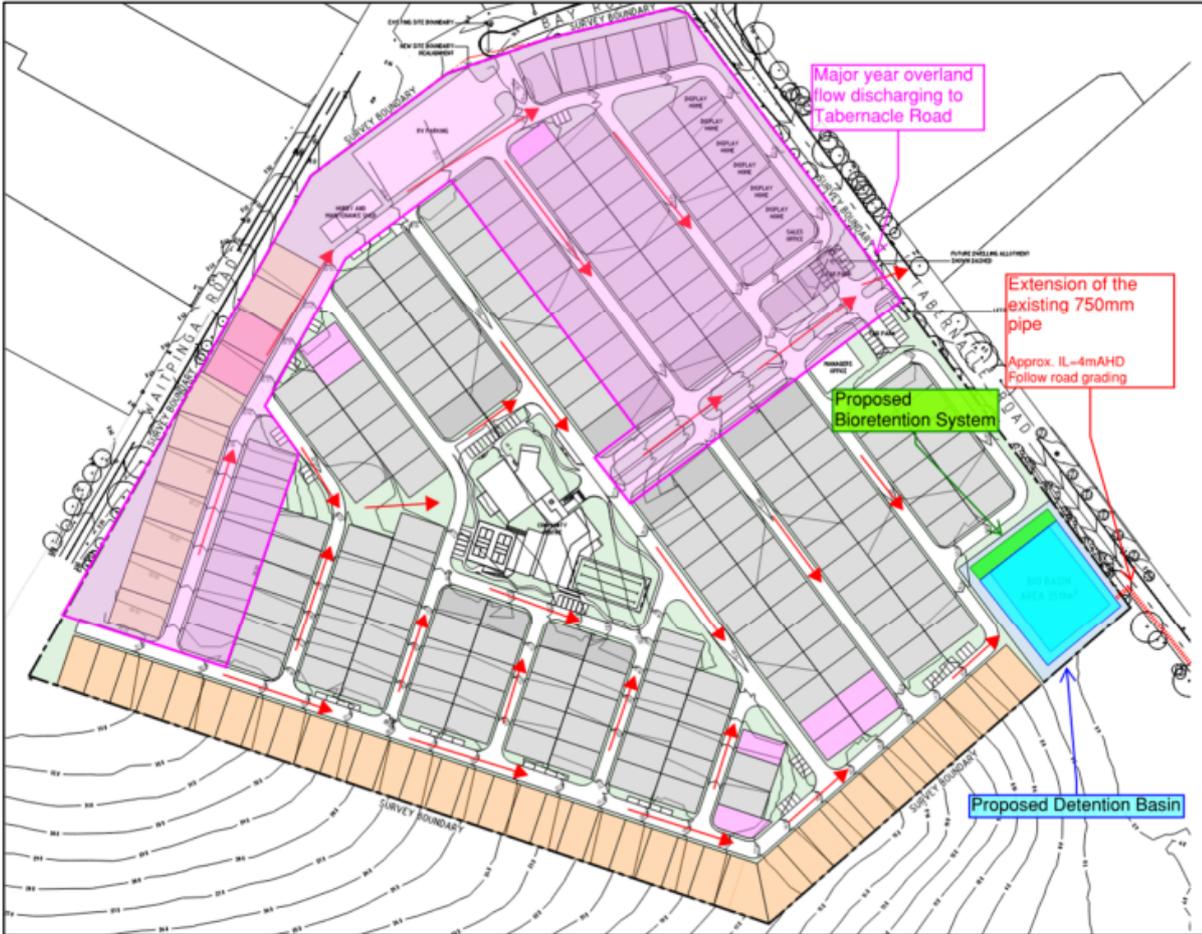


Figure 5-9: Overall stormwater strategy (Fyfe)

## 5.5. Earthworks, Retaining Walls & Fencing

Fyfe has undertaken a thorough analysis of required earthworks and retaining that has informed the site layout and design, seeking to minimise retaining wall heights and balance cut and fill. Proposed retaining walls are illustrated in the Preliminary Earthworks Plan in the Services Assessment Report prepared by Fyfe (**Appendix 4**) and fencing/landscaping illustrated in the Landscape Concept Plan in **Appendix 3** and as described as follows:

- Retaining walls up to 1.5m high located inside the boundary along Tabernacle Road (south of the entry) and approx. 0.5m (north of the entry), along with a 1.5m high vertical palisade (permeable) fencing in combination with a proposed landscape buffer to visually screen retaining and fencing (1.8m adjacent to the detention basin for safety). Notably, the retaining and fencing will be located inside the property boundary with landscape screening integrated with existing trees. The proposed retaining and fencing is clear of the existing trees along Tabernacle Drive, and will have no negative impact on those trees (refer Arborist Report) and cross section in **Figure 5-10** below;

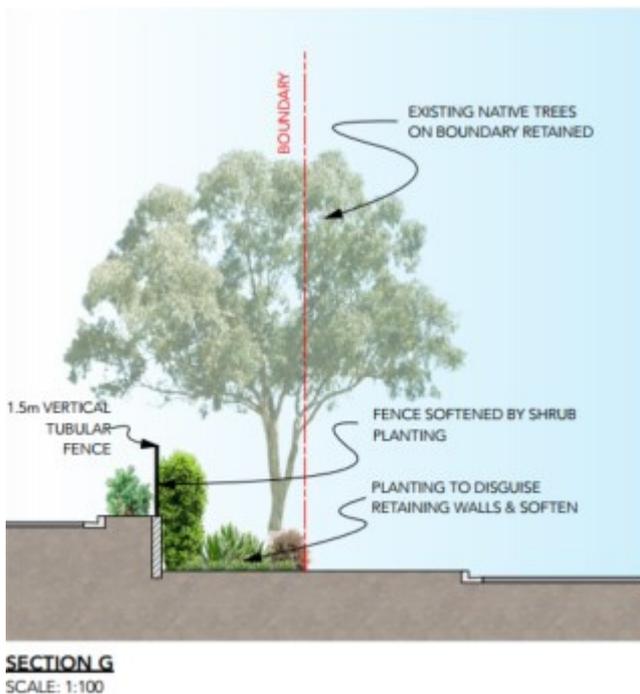


Figure 5-10 Tabernacle Road boundary cross section (Studio 151)

- Along the frontage of Bay Road / Mill Road, a landscape buffer will screen a solid 1.8m high Colorbond fence located at the rear of dwelling sites. The landscape buffer will provide visual screening and amenity to neighbours (**Figure 5-11**);

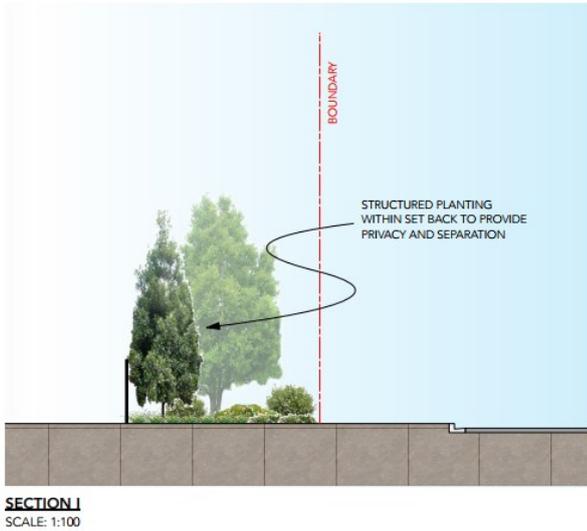


Figure 5-11 Bay Road landscape detail (Studio 151)

- Along the frontage of Waitpinga Road, a landscape buffer ranging from 1m to 10m will screen a solid 1.8m high Colorbond fence located at the rear of dwelling sites (**Figure 5-12**). There are only four (4) dwelling sites with a rear fence located on the Waitpinga Road boundary; however, this represents only a minor portion of the Waitpinga Road frontage. The indented landscape bay and additional landscaping along Waitpinga Road will provide effective screening of the site;

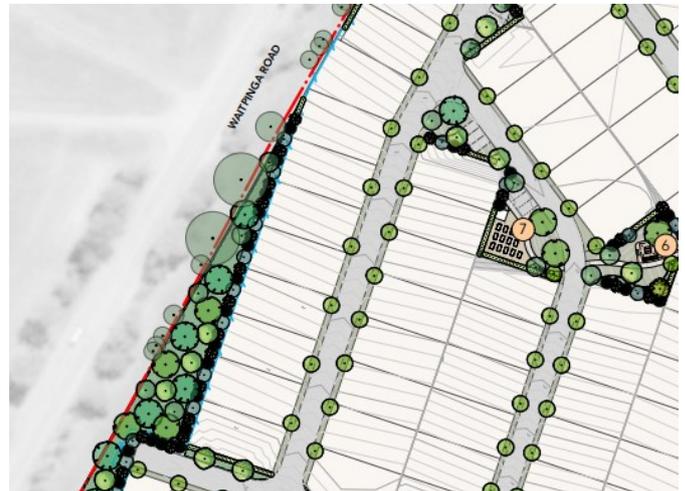
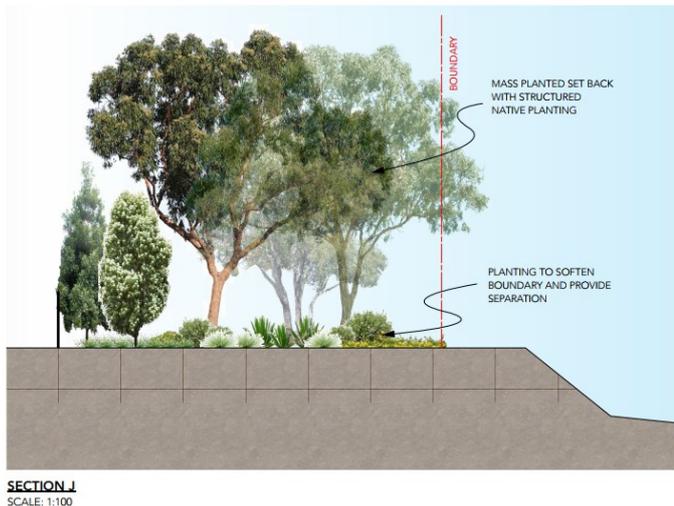


Figure 5-12 Waitpinga Road detail (Studio 151)

- 1.2m – 1.8m high feature post fence at the Tabernacle Road entrance (including signage);

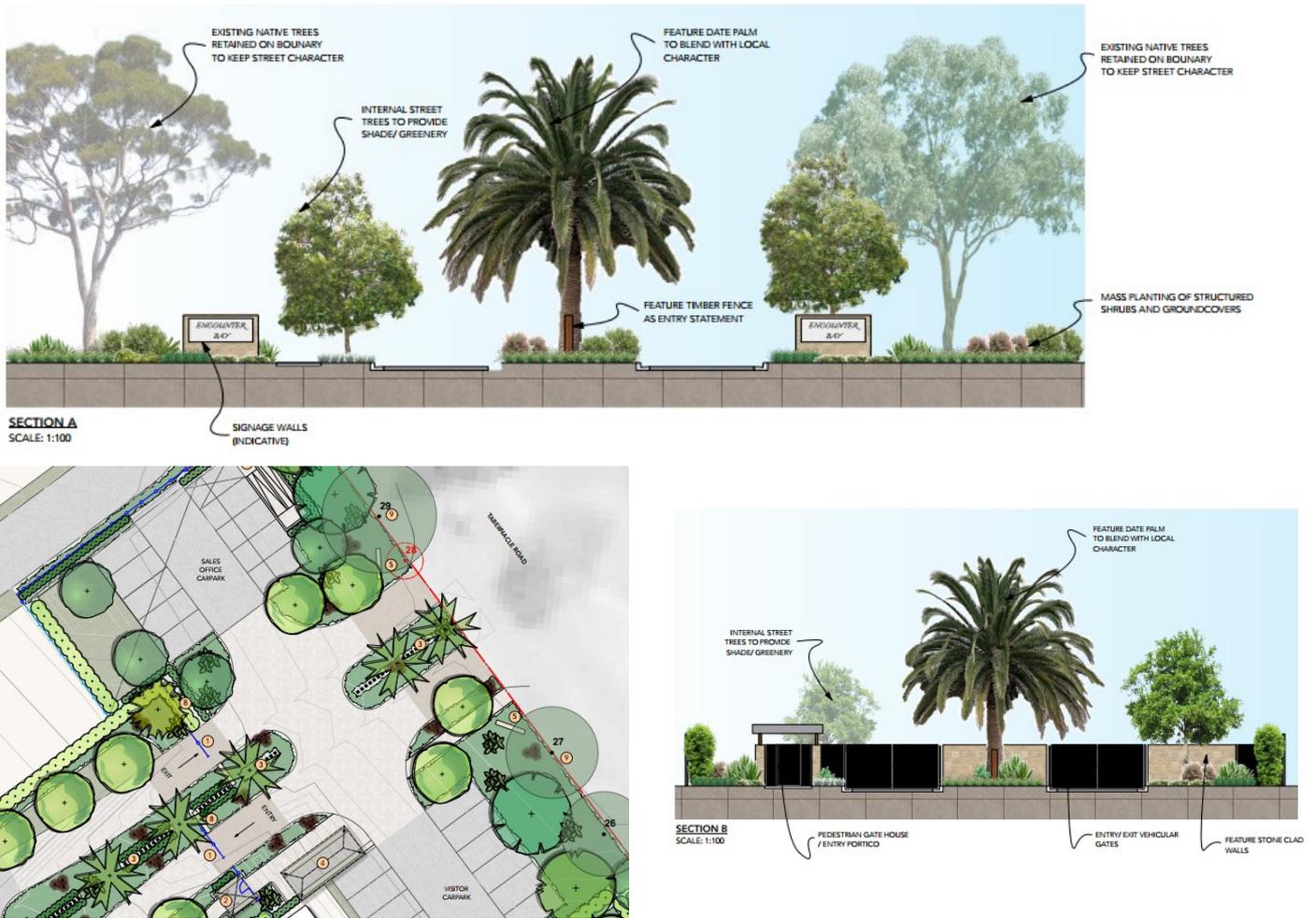


Figure 5-13 Tabernacle Road entry detail (Studio 151)

- A landscaped biobasin for stormwater detention, located in the eastern corner of the site adjacent to Tabernacle Road; and
- Retaining walls throughout the development to create level benched dwelling sites. The majority of retaining will be between 0m and 2.5m, with a small portion of internal retaining walls above 2.5 not visible beyond the boundaries of the site (**Figure 5.14**).



Figure 5-14 Site works plan (Fyfe)

The earthworks plan provided in the Services Assessment Report by Fyfe (Appendix B of the Fyfe report) snipped in **Figure 5.15** shows the extent of cut and fill proposed. The plan illustrates a balanced cut-and-fill strategy across the site, with higher cut areas concentrated in the central and western sections (shown in red and orange) and fill areas predominantly along the northern and eastern boundaries (depicted in green and blue), creating terraced levels that follow the natural contours to minimise retaining wall heights and visual impact. The earthworks strategy has been adopted having regard to the applicant’s knowledge of operating residential parks and the need to create safe, walkable streets, low-maintenance dwelling sites and limiting side retaining to facilitate better dwelling access and resident interactions.

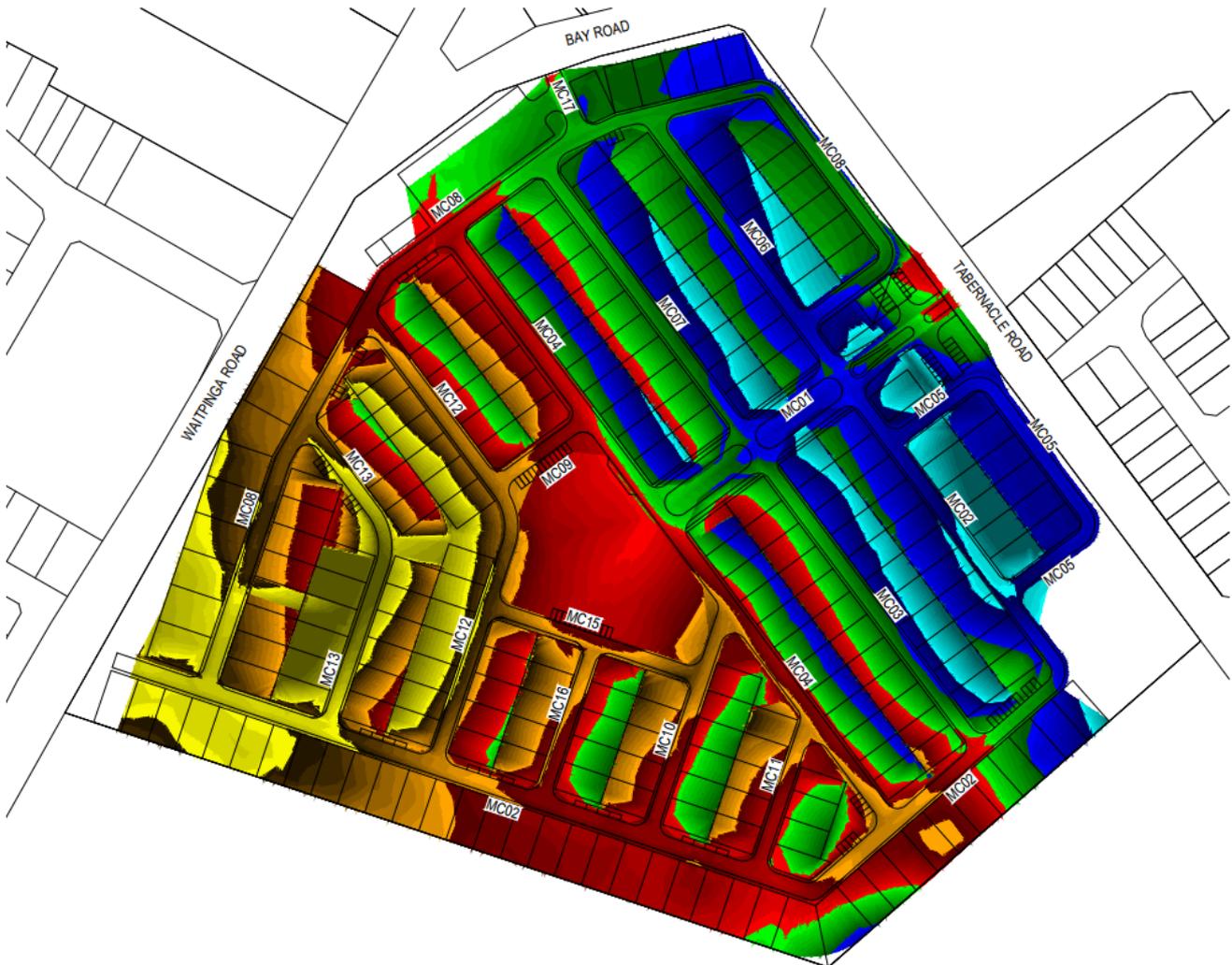


Figure 5-15 Earthworks heat map (cut = yellow to red, fill = green to blue) (Fyfe)

## 5.6. Site Servicing

The Services Assessment Report prepared by Fyfe (**Appendix 4**), provides a preliminary investigation of existing infrastructure located in the vicinity of the development, and high level advice in relation to new infrastructure required to service the site, including advice from service authorities. Subject to further investigation and detailed design, the development will be supported by a comprehensive servicing strategy that ensures the provision of essential infrastructure in accordance with relevant standards and authority requirements. The following provides a summary of information to date:

### Sewer

There are no existing sewer mains abutting the site. The nearest SA Water gravity sewer main (DN225) is located in Rosella Street, east of Tabernacle Road. To service the development, an extension of the SA Water network will be required, with a connection point proposed in the south-eastern corner of the site. Initial advice from SA Water indicates that a 225 mm



diameter connection will be adequate. A private internal gravity wastewater network will be designed in accordance with AS3500 standards and will discharge into the downstream system.

#### **Potable Water**

Potable water will be supplied from the existing SA Water DN200 main located along Tabernacle Road. A formal connection will be established at the proposed entrance road, with a 100 mm diameter connection anticipated to be sufficient for the development. A separate fire water service will also be provided. The internal water distribution network will be privately managed and connected to the SA Water supply point.

#### **Electrical**

The site is well positioned to access existing electrical infrastructure, with SAPN 11kV overhead lines along Waitpinga and Bay Roads and an underground 11kV line on Tabernacle Road. The development will require augmentation of the SAPN network, including installation of internal transformers and a private underground electrical network constructed to AS3000 standards. A detailed electrical master plan and formal connection application will be prepared during the detailed design phase.

#### **Telecommunications**

Existing NBN and Telstra infrastructure in the vicinity of the site will be extended to service the development. Preliminary advice from NBN Co confirms that the surrounding FTTP network has sufficient capacity to accommodate the proposed residential park, and no backhaul charges are anticipated.

#### **Gas**

There is no existing gas supply in the locality, and no gas servicing is proposed as part of the development.

## **5.7.External Works**

As the western side of Tabernacle Road (abutting the site) is unformed, it is proposed to undertake kerbing along the full frontage of the site, along the western side of Tabernacle Road and a portion of Bay Road. The extent of works on Tabernacle Road would only be the section that directly abuts the site boundary.

An overview of the extent of external works is provided in Appendix C of the Fyfe Services Assessment Report (**Appendix 4**).

## 6. PROCEDURAL MATTERS

### 6.1. Applicable Policies

The Planning and Design Code (Version 2025.21), in conjunction with the SA Property and Planning Atlas (SAPPA), identifies that the **Hills Neighbourhood Zone** applies and the following Overlays apply to the subject site:

- Affordable Housing Overlay;
- Hazards (Bushfire - Medium Risk) Overlay;
- Hazards (Flooding - Evidence Required) Overlay;
- Native Vegetation Overlay;
- Prescribed Water Resources Area Overlay; and
- Water Resources Overlay.

The following relevant **Technical and Numeric Variations (TNVs)** also apply, although these are not technically relevant to Residential Parks:

- *Gradient Minimum Frontage (Detached) (Minimum frontage for detached dwellings where the site gradient is less than 1-in-8 is 15m; 1-in-8 to 1-in-4 is 15m; greater than 1-in-4 is 15m)*
- *Gradient Minimum Site Area (Detached) (Minimum site area for detached dwellings where the site gradient is less than 1-in-8 is 560sqm; 1-in-8 to 1-in-4 is 560sqm; greater than 1-in-4 is 560sqm)*

### 6.2. Nature of Development

The proposal is best described as:

*“Change of use to ‘residential park’ with associated community and recreational facilities (including a swimming pool), an outbuilding, manager’s office, sales office, display homes, dwellings, earthworks and construction of ancillary retaining walls and fencing”.*

The proposed development is a ‘residential park’ in accordance with the land use definition prescribed in Part 7 of the Code:

- **‘Residential park** means a residential park operating under the regulatory framework of the Residential Parks Act 2007.’

Pursuant to the *Residential Parks Act 2007*, a ‘Residential Park’ is defined as:

- **“Residential park** means an area of land used or intended to be used in either or both of the following ways:
  - (a) as a complex of sites of dwellings in respect of which rights of occupancy are conferred under various residential park tenancy agreements, together with common area bathroom, toilet and laundry facilities and other common areas;
  - (b) as a complex of sites in respect of which rights of occupancy are conferred under various residential park site agreements, together with common areas (which may, but need not, include bathroom, toilet and laundry facilities)”

It is noted that earthworks of more than 9m<sup>3</sup> in the Hills Neighbourhood Zone is not exempt from the definition of development and requires consent.



Accordingly, the proposed development proposes the following elements: 'residential park', 'outbuilding', 'manager's office', 'swimming pool', 'sales office and display homes', 'earthworks', 'retaining wall' and 'fencing'. We understand that the 'community and recreation facilities', 'dwellings' and 'community workshop' fit within the definition of a 'residential park' and are not classified as separate elements as they are ancillary to the residential park.

### 6.3. Classification of Development

The proposal is classified as '**Code Assessed – Performance Assessed**' forms of development with the Hills Neighbourhood Zone.

### 6.4. Relevant Authority

The relevant authority to determine the development application will be **the City of Victor Harbor Assessment Manager or Fleurieu Regional Assessment Panel** as per Sections 93(1)(c) and 96 of the PDI Act.

### 6.5. Public Notification

Pursuant to Clause 5(f) of Table 5 of the Hills Neighbourhood Zone, 'Residential parks' are not listed as an exempt form of development from notification within Table 5 (Procedural Matters – Notification) of the Zone. It is expected that public notification will be required.

### 6.6. Agency Referrals

#### 6.6.1. Environment Protection Authority

Fyfe Pty Ltd has prepared a Preliminary Site Investigation and reviewed the site's history for potential contaminating activities that could have occurred on site and at adjoining properties (refer to **Appendix 8**).

The Site Contamination Declaration Form acknowledges that site contamination as a result of Class 1 activities occurring on the site or adjacent land is unlikely to be present. In our opinion, State Agency referral to the Environment Protection Authority will not be required.

#### 6.6.2. Native Vegetation Council

A referral to the Native Vegetation Council is likely to be required for this application, as 'Level 3' clearance of native vegetation is proposed. At the time of writing, a separate application for clearance had been submitted to the NVC for assessment, however it is acknowledged that referral to the NVC will be required.

## 7. CODE ASSESSMENT

The subject land is located at the northern edge of the **Hills Neighbourhood Zone** as indicated within the Planning and Design Code (Version 2025.21), as illustrated in **Figure 7-1**.

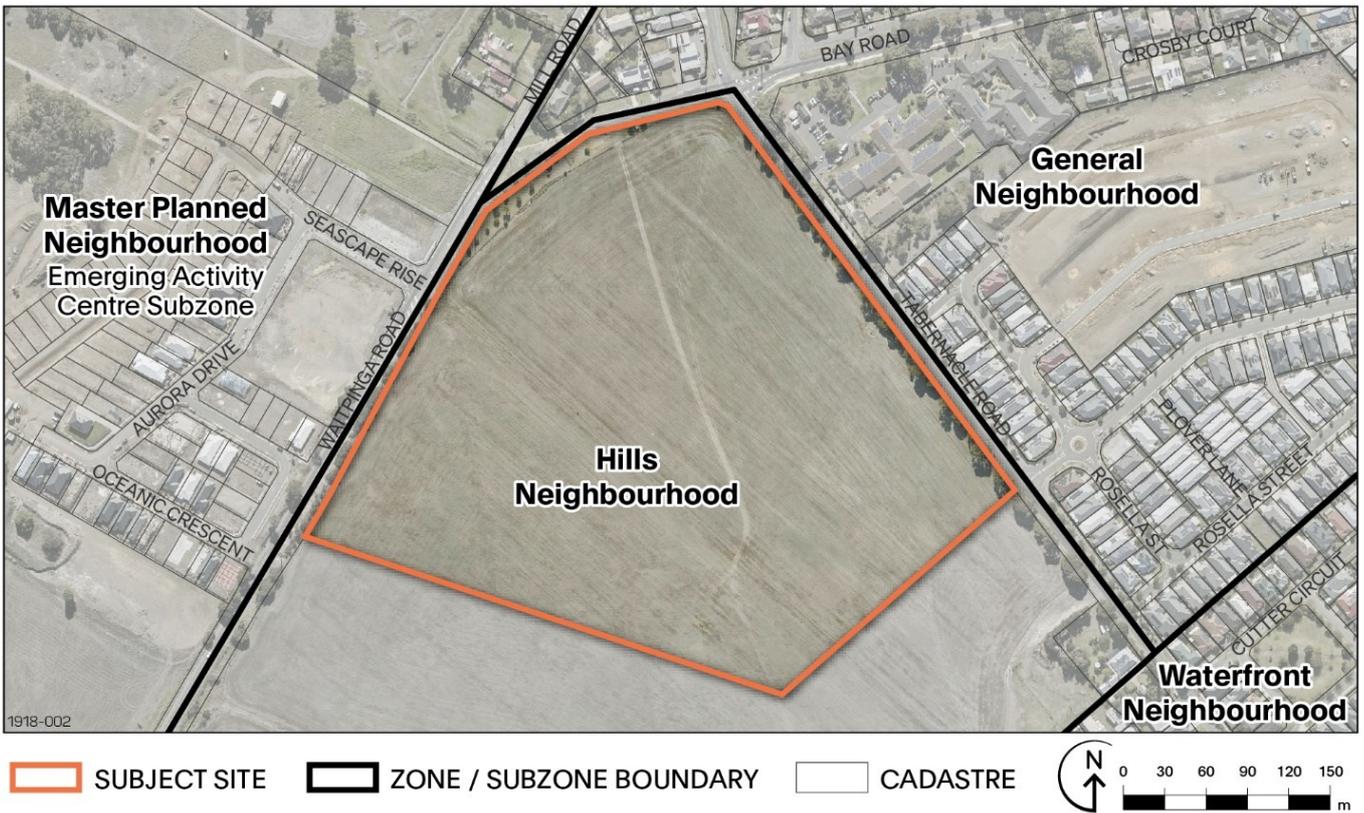


Figure 7-1: Zoning map (Graphica)

The following section provides an assessment of the proposal against the relevant Planning and Design Code Desired Outcomes (DOs) and Performance Outcomes (POs). This assessment is grouped under a series of headings which address specific aspects of the proposed development.

## 7.1. Land Use & Density

Hills Neighbourhood Zone	Overlay	General Development Policies
DO 1 POs: 1.1, 2.1	Nil	Nil

The Hills Neighbourhood Zone's Desired Outcome seeks:

**DO 1:** *Development provides a complementary transition to adjacent natural and rural landscapes. Low density housing minimises disturbance to natural landforms and existing vegetation to mitigate the visible extent of buildings, earthworks and retaining walls.*

Relevant Performance Outcomes include:

**PO 1.1:** *Predominantly low density residential development with complementary non-residential uses compatible with natural landforms and a low density residential character.*

**PO 1.3:** *Non-residential development located and designed to improve community accessibility to services, primarily in the form of:*

*(a) small scale commercial uses such as offices, shops and consulting rooms*

*(b) community services such as educational facilities, community centres, places of worship, child care facilities and other health and welfare services*

*(c) services and facilities ancillary to the function or operation of supported accommodation or retirement facilities*

*(d) open space and recreation facilities.*

**PO 1.4:** *Non-residential development sited and designed to complement the residential character and amenity of the neighbourhood.*

**PO 2.1** *Allotments/sites created for residential purposes are of suitable size and dimension to accommodate residential development that is sensitive to the natural topography and compatible with the housing pattern in the locality.*

Envisaged land uses in the Zone include dwelling, office, recreation area and open space (DPF 1.1).

The Hills Neighbourhood Zone seeks development that provides a complementary transition to adjacent natural and rural landscapes, with low-density housing that minimises disturbance to natural landforms and existing vegetation (DO 1). The proposed residential park strongly aligns with this intent and satisfies key Performance Outcomes, including PO 1.1, PO 1.3, PO 1.4, and PO 2.1.

The development will deliver a low-density residential outcome, with a net residential density<sup>1</sup> of approximately 20 dwellings per hectare, well within the Code’s low net residential density definition of less than 35 dwellings per hectare. HTA communities elsewhere average 20 dwellings per hectare with 1.4 persons per dwelling, equating to 28 residents per hectare, compared to 38 residents per hectare typical of suburban subdivision (15 dwellings/ha, 2.5 persons/dwelling).

The proposal, being ‘low density’ as defined in the Code, and comprising low scale (single storey) detached dwellings, ensures the built form remains consistent with the zone’s envisaged character and provides an appropriate transition to rural and semi-rural areas to the west within the broader locality. The layout has been designed to respond to the site’s undulating topography, minimising earthworks and retaining walls as much as possible, and preserving existing mature vegetation along Tabernacle Road, meeting the zone’s Desired Outcome for minimal visual and environmental impact.

The plan in **Figure 7-2** below illustrates the approximate net residential densities for the site and surrounds, illustrating that the proposed density is consistent with surrounding existing and approved development.

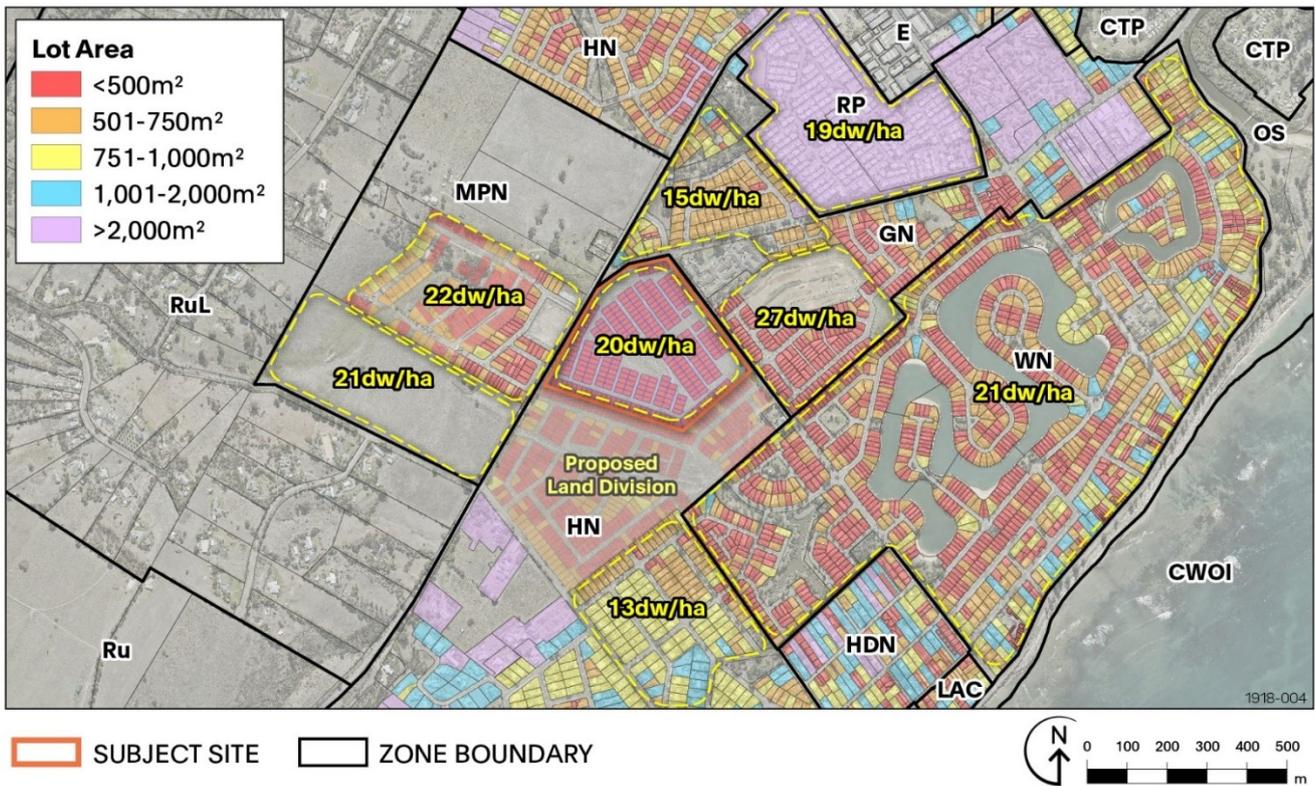


Figure 7-2 Net residential densities in proximity of the site (Graphica)

<sup>1</sup> Net Residential Density is defined in the Code as: *Is calculated by dividing the total number of dwellings by the area of residential land that they occupy (excluding other land uses, roads, public open space and services) and expressed as dwelling units per hectare (du/ha)*

The residential park model introduces a housing typology that aligns with the zone's envisaged land uses, including detached dwellings and recreation facilities for use by the residents, while adding community facilities that are ancillary and compatible with the predominant residential land use. These facilities, including a clubhouse, landscaped open spaces, and recreational amenities, enhance liveability without compromising the zone's low-density character. In addition, dwellings will be single storey and the centrally located clubhouse up to two storeys, maintaining a low rise residential character and scale, consistent with the surrounding existing and emerging character.

Importantly, the proposal addresses a critical demographic and housing need. Land lease communities cater primarily to residents aged 50 and over who are downsizing from larger homes, offering an accessible, secure, and lifestyle-oriented housing option. This aligns with broader planning objectives for housing diversity and affordability, while supporting ageing-in-place within established communities. By providing an alternative to traditional subdivision, the residential park contributes to sustainable growth and housing choice in Victor Harbor without increasing development intensity beyond what the zone anticipates. This also frees up family homes for younger families and working-age residents, which supports housing diversity and efficient use of existing housing stock. Victor Harbor has a median age of 60 and 42.2% of population over 65, far above Greater Adelaide averages, indicating strong demand for age-friendly housing options.

In summary, the proposed residential park satisfies the Hills Neighbourhood Zone's Desired Outcomes and Performance Outcomes by delivering low-density housing that respects natural landforms, integrates landscaping, and provides complementary community uses. It responds to clear housing needs in a manner consistent with the Planning and Design Code's intent for orderly and sustainable development.

## 7.2.Design

The following assessment has been detailed via the relevant sub-headings, and assesses the residential park layout, built form and landscaping. Each sub-heading has considered the Desired Outcome from Design in Urban Areas module of the General Development Policies (as well as the relevant Zone provisions), which is outlined as follows:

**DO 1: Development is:**

- (a) contextual - by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributing to the character of the locality*
- (b) durable - fit for purpose, adaptable and long lasting*
- (c) inclusive - by integrating landscape design to optimise pedestrian and cyclist usability, privacy and equitable access and promoting the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors*
- (d) sustainable - by integrating sustainable techniques into the design and siting of development and landscaping to improve community health, urban heat, water management, environmental performance, biodiversity and local amenity and to minimise energy consumption.*

The design approach for Encounter Bay prioritises contextual integration through extensive landscaping and low-rise built form, ensuring durability and adaptability for an ageing demographic, further described below.

### 7.2.1. Residential Park Design, Layout & Setbacks

Hills Neighbourhood Zone	Overlay	General Development Policies
POs: 2.1, 5.1, 6.1	Nil	<b>Design in Urban Areas</b> <b>DO1</b> <b>POs: 1.1, 1.3, 1.4, 1.5, 2.1-5.1, 7.1-10.2, 17.1-18.2, 20.1-25.1</b>

The residential park design and layout is designed around a logical grid pattern, to achieve a high quality facility for its future community that is logically planned, accessible and welcoming for all residents. In addition, the layout has been designed to incorporate appropriate infrastructure services, a proportionate balance of earthworks and ensures emergency service vehicles can access the site (these additional considerations are discussed in further sections of the report).

A key feature of the proposed residential park is its avoidance of creating a ‘gated’ community, proposing low open fencing to its primary Tabernacle Road frontage and extensive landscaping to ensure it is integrated with surrounding communities and is visually permeable and protects existing residential amenity. As the site is currently vacant, with extensive street frontages, the proposal is cognisant of establishing new streetscape patterns that integrate with existing surrounding communities and create an attractive landscaped outlook, with consistent and appropriate setbacks to buildings.

The residential park layout provides the following design considerations:

- The community and recreation facilities are sited centrally within the site to provide an inclusive meeting point for all residents to socialise and enjoy, and promote walkability and other active modes of transport to access facilities;
- A linear park and walking trail connects through the main Tabernacle Road entrance, through the clubhouse and communal facilities and towards Waitpinga Road, providing open space and outdoor recreation opportunities that encourage healthy lifestyles, landscape opportunities and an attractive outlook for dwellings;
- The site layout has been designed to include an internal service road along Tabernacle Road, reflecting the existing land division approval, and ensure dwellings are set back from Tabernacle Road (by more than 13m) and space is provided for a landscape buffer integrated with existing mature trees to be preserved. The proposed setbacks to the primary street frontage meet DPF 5.1, seeking setbacks of 8m (where there are no existing buildings sharing the same street frontage);
- A landscape buffer and solid fence is also provided along Bay Road to create an attractive outlook for existing Bay Road residents and protect the privacy of both new and existing dwellings. The proposed maintenance shed is set back at least 7.6m from Bay Road/Mill Road and rear boundaries of dwelling sites approximately 5m from Bay Road with landscaping provided within the setback areas, significantly exceeding the secondary street setback guidelines in DPF 6.1 (minimum 900mm);

- The main entry from Tabernacle Road will be visual open, creating a focal point and enabling views from Tabernacle Road through the site towards the clubhouse and recreational facilities. Permeable fencing along Tabernacle Road will contribute to the sense of openness;
- The proposed sales office and display homes are setback at least 13m to the Tabernacle Road property boundary, allowing for landscaping forward of building lines and meeting DPF 5.1.
- Dwelling sites with rear boundaries to Waitpinga Road are deeper where possible to enable a minimum 4m rear setback to proposed dwellings. An inset fence and landscaping within the site will create a varied and attractive streetscape along Waitpinga Road;
- The design provides diverse sized dwelling sites and future dwellings will generally be two (2) or three (3) bedrooms with double garages, providing an appropriate selection for future residents, most of which are seeking to downsize from their existing homes. The smaller sized dwelling sites reduces maintenance demands for residents, whilst still providing high quality amenity through appropriately sized private open spaces for small gardens and recreation, meeting minimum private open space guidelines in Table 1 – Private Open Space of at least 24m<sup>2</sup> and minimum dimension of 3m. Notwithstanding, all residents will have access to a diverse range of communal facilities, recreation activities and open spaces; and
- Overall site coverage of 39.7% (overall covered area of 51,475m<sup>2</sup>) meeting Zone PO 3.1 and DPF 3.1 (site coverage of no more than 40%/50% on sites with a gradient of no more than 1-in8/less than 1-in8)

For the reasons discussed above, the proposed residential park's layout achieves a high quality design that aligns with the Zone and General provisions of the Code.

### 7.2.2. Built Form

Hills Neighbourhood Zone	Overlay	General Development Policies
POs: 3.1, 4.1, 5.1, 6.1, 8.1, 9.1, 10.1, 10.2, 12.1-12.3	Nil	<b>Design in Urban Areas</b>  <b>DO 1</b>  <b>POs:</b> 1.3, 2.1, 2.2, 2.3, 2.4, 4.1, 4.2, 4.3, 5.1, 10.1, 10.2, 17.1, 17.2, 18.1, 21.1, 21.2

#### Clubhouse & Recreational Facilities

The proposed community and recreational facilities are designed to be the visual and social focal point of the development, creating a central hub that promotes social interaction and supports an active lifestyle for residents. The two-storey building incorporates generous glazing across all façades to maximise natural light and provide visual connection to surrounding landscaped areas. A mix of high-quality materials, including rendered finishes, stone accents, vertical timber-look battens, and contemporary cladding, adds texture and interest, while the skillion roof form introduces articulation and a modern aesthetic. Zone PO 10.1 seeks development that will be visible from urban areas achieve a profile that blends with the topography of the land, avoids the use of bright or reflective materials and finishes, and incorporates landscaping to assist in reducing bulk and

scale. The proposed two storey building meets these objectives through careful design and siting to minimise visibility and visual impact from beyond the site boundaries, and also meets Zone PO 4.1 seeking a low-rise suburban character and DPF 4.1 (maximum building height of 2 levels or 9m).

The building is setback a substantial distance from the nearest public road, meeting Zone setback guidelines as well as meeting the intent of PO 10.2 which seeks development of more than 1 building level incorporating stepping and increased setbacks at the upper level.

The main entrance to the building is positioned for clear visibility from Tabernacle Road, ensuring intuitive wayfinding for residents and visitors, and providing views through the site from the public realm. Parking and drop off zones are conveniently located near the building entry, reinforcing accessibility and functionality. Overall, the design prioritises amenity, durability, and visual appeal, delivering a landmark facility that complements the residential character of the Hills Neighbourhood Zone.

### **Dwellings (including Display Homes)**

Proposed dwellings will be single storey only, with a maximum building height of approx. 4.5m above natural ground level ensuring a low-rise development minimising visual impact. The nature and siting of the development ensures there will be no adverse amenity impacts on existing neighbouring residential development (ie. overlooking and overshadowing). Dwelling facades incorporate natural materials and colours, utilising light weight construction and fibre cement cladding, with masonry and stone accents.

Each dwelling will be sited on an individual site to provide appropriate side and rear boundary setbacks to meet Zone provisions, private open space to meet GDP Design in Urban Areas DPF 21.1 (and Table 1) and on site car parking to adequately service the development, with each dwelling provided with a double garage.

Although internal roads are private, dwellings have been designed to meet design guidelines in GDP Design in Urban Areas POs 17.1-18.2, incorporating front windows facing (private) road frontages for surveillance, entry doors to address the street and provide a legible entry point, living rooms with external outlook and bedrooms separated from communal recreation areas.

### **Ancillary buildings**

Ancillary buildings proposed, including the maintenance shed, manager's office and sales office are low rise, single storey buildings, emulating the materials and colour palette of the dwellings, and are sited to ensure they are set back from public road frontages (as described in **Section 7.2.1**) and within a landscaped setting. The buildings will not detract from the streetscape or appearance of primary residential buildings on the site or neighbouring properties (Zone POs 12.1-12.3 and GDP Design in Urban Areas PO 19.1). The sales office will be in the form of a dwelling, and when no longer required as a sales office, will revert to residential use. These ancillary buildings provide integral services and facilities for the residents and staff of the residential park, ensuring the development is well maintained and appropriately serviced.

### 7.2.3. Landscaping

Hills Neighbourhood Zone	Overlay	General Development Policies
Nil	Nil	<b>Design in Urban Areas</b> <b>POs: 3.1, 7.6, 9.2, 22.1</b>

The proposed design and layout places a significant emphasis on landscaping, as described in the Landscape Master Plan prepared by Studio 151 (**Appendix 3**).

A total landscaped area of 13,562m<sup>2</sup> is proposed, comprising more than 10% of the overall site (not including landscaping on individual dwelling sites).

Areas of planting are focussed along the public road boundaries to provide visual buffers and amenity, along the central spine and linear park, within the area surrounding the clubhouse, along internal private roads and within the bio basin. The proposal represents a significant opportunity to increase the urban tree canopy, as the site is currently cleared for farming, and the landscape concept includes a wide variety of small medium and large trees, shrubs, ground covers and plant species that are appropriate to the location and in line with Council’s tree planting guidelines.

The proposed development incorporates landscaping measures consistent with the Planning and Design Code’s objectives for sustainable and visually sensitive design. Soft landscaping and tree planting have been integrated throughout the site to reduce heat absorption, provide shade and shelter, support stormwater infiltration, and enhance the overall appearance of streetscapes. Parking areas and private internal roads are complemented by landscaping to improve amenity and visual quality, while retaining walls visible from public roads and open spaces are screened with planting to minimise visual impact. These measures collectively align with the Code’s intent to deliver functional, attractive, and environmentally responsive development.

## 7.3. Siteworks, Infrastructure, Services & Stormwater Management

The application is accompanied by detailed reports by Fyfe Engineers addressing proposed earthworks, stormwater management and service infrastructure (refer **Appendices 5 & 6**).

### 7.3.1. Siteworks & Retaining Walls

Hills Neighbourhood Zone	Overlay	General Development Policies
<b>POs: 11.1, 11.2, 11.3</b>	Nil	<b>Design in Urban Areas</b> <b>POs: 8.1, 8.2, 8.3, 8.4, 9.1, 9.2</b>

The internal road network and dwelling layout have been designed to achieve a functional and visually sensitive outcome. The

configuration minimises cut and fill across the site, reducing the need for high retaining walls and limiting visual impacts beyond the boundaries. Where retaining walls are required, they are positioned and screened to maintain an attractive outlook and protect residential amenity, consistent with PO 11.1–11.3 of the Hills Neighbourhood Zone and Design in Urban Areas POs 8.1–8.4 and 9.1–9.2. Earthworks follow the natural contours of the land, balancing cut and fill to avoid excessive disturbance to the topography.

The layout also incorporates infrastructure corridors and turning areas to ensure safe and efficient access for emergency vehicles without compromising the landscaped character of the development. This integrated approach supports the zone’s Desired Outcome for low-density housing that complements natural landforms and minimises the visible extent of earthworks and retaining walls, while delivering a high-quality residential environment.

Dwelling sites are terraced up the hill to reduce the prominence of built form and keep retaining walls as low as practicable. External boundary walls will generally be under 1.5 metres in height, with any higher internal walls screened from public view. Landscaping will be strategically used to soften retaining structures and enhance amenity throughout the development, consistent with PO 9.2. Streetscapes, pocket parks, and linear open spaces will be planted with native vegetation, contributing to biodiversity and creating a visually appealing environment.

By following the natural contours of the site and adopting a terraced design, the proposal aligns with DO 1 and PO 3.1, which require development to complement the character of low-density neighbourhoods and provide sufficient space around buildings for light, ventilation, and outlook. This approach ensures the residential park is functional, visually sensitive, and consistent with the intent of the Hills Neighbourhood Zone.

### 7.3.2. Infrastructure & Services

Hills Neighbourhood Zone	Overlay	General Development Policies
Nil	Nil	<b>Infrastructure</b> <b>POs 11.1, 11.2, 12.1, 12.2</b>

As described in **Section 5.6**, infrastructure will be upgraded as required, in conjunction with service authorities, to ensure the site is appropriately serviced with water, wastewater and electricity. The proposal therefore aligns with General Development Policies relating to Infrastructure (PO11.1, 11.2, 12.1 and 12.2).

### 7.3.3. Stormwater Management

Hills Neighbourhood Zone	Overlay	General Development Policies
	<b>Hazards (Flooding - Evidence Required)</b> <b>DO 1</b>	<b>Design in Urban Areas</b> <b>POs 5.1, PO 36.1, PO 36.2</b>

	<p><b>PO 1.1</b></p> <p><b>Water Resources</b></p> <p><b>DO1</b></p> <p><b>POs 1.1, 1.5, 1.6, 1.8, 1.9</b></p>	
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The proposal has been designed to meet the relevant provisions of the Hazards (Flooding – Evidence Required) Overlay, Water Resources Overlay, and General Development Policies – Design in Urban Areas, which collectively seek to mitigate flood risk, protect water quality, and maintain natural hydrological systems.

DO 1 and PO 1.1 of the Hazards (Flooding – Evidence Required) Overlay require development to adopt a precautionary approach and minimise flood risk. As detailed in the Stormwater Management Plan by Fyfe, the site’s stormwater strategy achieves this through:

- A detention basin located at the low point of the site, sized to restrict post-development flows to pre-development levels (approx. 1,200 m<sup>3</sup> for minor events and 3,200 m<sup>3</sup> for major events);
- Hydraulic modelling confirms that during a 1% AEP event, overflow to Tabernacle Road will be contained within the kerbed road reserve, with a maximum depth of 0.137 m, well below levels that would compromise property or infrastructure; and
- No inundation of allotments will occur under minor storm conditions (0.2EY), ensuring ongoing use and safety.

DO 1 and POs 1.1, 1.5, 1.6, 1.8, and 1.9 of the Water Resources Overlay seek to protect watercourses, floodplains, and water quality (noting that the Overlay only spatially applies to a small portion of the site on Tabernacle Road). The proposal responds as follows:

- No modification of natural watercourses or floodplains occurs, discharge is directed to Tabernacle Road via existing drainage corridors and an extended 750 mm pipe, consistent with PO 1.1;
- A bioretention basin (approx. 300m<sup>2</sup>) and vegetated landscaping provide filtration to reduce sediment and nutrient loads, meeting PO 1.5 and PO 1.8 objectives;
- Rainwater tanks (1 kL per allotment) are incorporated for reuse in toilets and laundry, reducing demand on potable water and supporting PO 1.9; and
- MUSIC X modelling confirms pollutant reduction targets are exceeded:
  - TSS: 93% (target 80%)
  - TP: 64% (target 60%)
  - TN: 48% (target 45%)
  - Gross pollutants: 100% (target 90%).

The stormwater system is designed to maintain natural hydrological processes and manage quality and quantity of runoff to align with Design in Urban Areas – General Development Policies PO 5.1, 36.1 and 36.2. The strategy avoids adverse impacts

on surface and groundwater by integrating detention, infiltration areas, and WSUD measures. Common access roads include GPTs and biofiltration systems to minimise discharge of sediment, nutrients, and contaminants. Detention basins and controlled discharge points ensure peak flows do not exceed pre-development levels, mitigating downstream impacts.

Overall, the proposed stormwater management system adopts a precautionary approach to flood risk, protects water quality, and integrates WSUD principles. It complies with all relevant Code provisions by:

- Limiting post-development flows to pre-development rates;
- Containing major storm overflows within the road reserve;
- Achieving pollutant reduction targets through GPTs, bioretention, and rainwater reuse; and
- Maintaining natural hydrological systems and supporting downstream environmental needs.

## 7.4. Traffic, Access and Parking

ETA has prepared a Transport Impact Assessment (**Appendix 6**) that considers access design, parking requirements and traffic generation and distribution from the proposed residential park.

Hills Neighbourhood Zone	Overlay	General Development Policies
Nil	<b>Hazards (Bushfire – Medium Risk) Overlay</b>  <b>PO 5.1</b>	<b>Design in Urban Areas</b>  <b>POs:</b> 7.2, 7.3, 7.4, 7.5, 7.6, 20.1, 20.2, 23.1, 23.2, 23.3, 23.4, 23.5, 23.6  <b>Transport, Access and Parking</b>  <b>DO 1</b>  <b>POs:</b> 1.1, 2.1, 2.2, 3.1, 3.3, 3.5, 3.6, 3.8, 5.1

The traffic and transport provisions listed above generally seek development that provides safe, convenient, and efficient access and parking arrangements without compromising the function of the surrounding road network.

DO 1 and PO 1.1 of the Transport, Access and Parking provisions require development to avoid adverse impacts on the surrounding road network and intersections by ensuring traffic volumes remain within capacity and do not compromise safety or efficiency. In line with this intent, the proposed residential park is expected to generate approximately 61 vehicle trips in the peak hour and 638 trips daily, based on conservative Transport for NSW rates, although operator data suggests actual peak trips will be lower (AM: 0.19 vtpd; PM: 0.14 vtpd).

Traffic will primarily access the site via Tabernacle Road (70%) with minor distribution to Bay Road (30%). Even with these increases, predicted volumes remain well within the capacity of the adjacent road network, with Tabernacle Road increasing to 2,720 vpd and Bay Road (E) to 1,284 vpd, both below collector road thresholds (3,000 vpd).



SIDRA modelling confirms all intersections will continue to operate at Level of Service A, with degrees of saturation below 0.21 and minimal queuing (maximum 5.7 m), demonstrating compliance with the Code’s requirement for efficient intersection performance.

The Code requires safe and convenient access for all vehicles, including emergency and service vehicles (POs 2.1 and 2.2), and internal streets designed for functionality and safety (Design in Urban Areas PO 23.1). The proposal meets these objectives by providing two access points:

- Primary access from Tabernacle Road for general traffic;
- Secondary controlled access via Bay Road primarily for RV/caravan parking and bushfire egress.

Internal roads are designed with 6.0 m and 7.0 m carriageways, accommodating two-way traffic and heavy vehicles. Turn path diagrams confirm suitability for a 10.2 m waste collection vehicle and caravans, with minor refinements to be addressed at detailed design.

Sight distance requirements for a 20 km/h design speed are met, subject to maintaining low landscaping at intersections, consistent with PO 23.4 which seeks safe intersection sight lines.

In accordance with PO 5.1 of the GDP, development should provide adequate on-site parking for residents and visitors. Based on Table 1 of the Code, the development requires 583 spaces (530 for residents and 53 for visitors). The proposal exceeds this requirement by providing 530 resident spaces and 96 visitor spaces, ensuring compliance and reducing reliance on on-street parking. Parking design meets AS/NZS 2890.1 and 2890.6 standards, including accessible spaces and compliant aisle widths, consistent with Design in Urban Areas PO 7.6 which seeks landscaped and functional parking areas.

The Hazards (Bushfire – Medium Risk) Overlay requires safe access and egress for emergency vehicles. The proposal satisfies this by providing two separate access points (Tabernacle Road and Bay Road) and internal roads designed to accommodate fire appliances, exceeding minimum turning requirements.

Overall, the proposed development aligns with the Code’s traffic, parking and transport objectives by:

- Maintaining safe and efficient traffic conditions with negligible impact on the surrounding network;
- Providing compliant access arrangements for residents, visitors, and emergency vehicles;
- Exceeding minimum parking requirements and ensuring functional, accessible layouts; and
- Incorporating bushfire-safe design through dual access points and suitable internal road geometry.

## 7.5. Bushfire Management

Hills Neighbourhood Zone	Overlay	General Development Policies
Nil	<b>Hazards (Bushfire – Medium Risk)</b> <b>DOs 1 &amp; 2</b>	Nil

**POs:** 1.1, 2.1, 3.1, 3.2, 3.3, 5.1, 5.2, 5.3

The design of the proposed Residential Park has been informed by a Bushfire Risk Assessment and Bushfire Emergency Management Plan (BEMP) prepared by SA Bushfire Solutions and Hometown Australia. The site is located within the Hazards (Bushfire – Medium Risk) Overlay of the Planning and Design Code, which requires development to respond to bushfire risk through appropriate siting, design, and emergency access arrangements.

The proposal responds as follows:

- All dwellings are located away from high-risk vegetation (PO 1.1) and will be constructed to BAL 12.5 in accordance with AS3959:2018 and MBS 008, reducing ember and radiant heat exposure (PO 2.1, PO 3.1).
- Two access points (Tabernacle Road and Bay Road) and 6–7 m wide internal roads provide safe evacuation and fire appliance access (PO 5.1, PO 5.2).
- Habitable buildings will be provided with a minimum 2,000 L water supply (PO 3.3);
- As Hometown owns the broader parcel of land adjoining the site to the south (currently farmland but proposed for residential subdivision), they will be able to maintain grass below 100mm at the interface to reduce fire spread and to meet a 'low threat' vegetation classification; and
- The Bushfire Emergency Management Plan (BEMP) provides early evacuation protocols, shelter procedures, and communication strategies aligned with AS3745:2010.

The proposal meets all bushfire provisions by integrating compliant siting, BAL-rated construction, dual access, vegetation management, and emergency planning to protect life and property.

## 7.6. Native Vegetation

Hills Neighbourhood Zone	Overlay	General Development Policies
Nil	<b>Native Vegetation</b>  <b>DO 1</b>  <b>PO: 1.1, 1.2</b>	Nil

The Native Vegetation Overlay seeks to protect areas of native vegetation in order to sustain biodiversity, threatened species and vegetation communities, fauna habitat, ecosystem services, carbon storage and amenity values (DO 1). Development should seek to avoid or minimise clearance where possible (PO 1.1). PO 1.2 is most relevant:

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

- (a) *significant wildlife habitat and movement corridors*

(b) *rare, vulnerable or endangered plants species*

(c) *native vegetation that is significant because it is located in an area which has been extensively cleared*

(d) *native vegetation that is growing in, or in association with, a wetland environment.*

The proposal necessitates removal of nine immature River Red Gums (*Eucalyptus camaldulensis*) located along the Tabernacle Road boundary. These trees are classified as Level 3 clearance under the *Native Vegetation Regulations 2017* and were assessed in the Native Vegetation Clearance Data Report prepared by Jeremy Ross-Carter (**Appendix 7**).

The assessment found that:

- The trees are scattered, small to medium in size, and generally in poor to moderate health, with no hollows present;
- While the trees may provide potential habitat for fauna species listed under the *National Parks and Wildlife Act 1972*— including Eastern Shrike-tit (Rare), Common Brushtail Possum (Rare), and Black-chinned Honeyeater (Vulnerable), the Native Vegetation Council advised that removal is unlikely to significantly impact habitat critical to species survival;
- No threatened plant species were recorded, and the vegetation is not associated with a wetland environment; and

Inclusion of proposed planting, including ornamental South Australian Blue Gums reduces the impact to “At Variance”.

Clearance cannot be avoided due to fencing and site layout requirements to facilitate the proposed development. The applicant will achieve a Significant Environmental Benefit (SEB) through payment into the Native Vegetation Fund, totalling \$3,113.55.

## 8. SUMMARY & CONCLUSION

This development application seeks Planning Consent for a residential park within the Hills Neighbourhood Zone at Lot 10, Tabernacle Road, Encounter Bay.

Following an inspection of the subject site and locality, a review of the architectural plans, civil plans and supporting technical documentation and a detailed assessment of the proposed development against the relevant provisions of the Planning and Design Code, we have formed the opinion that the proposed development represents appropriate and orderly development which accords with the relevant provisions of the Code for the reasons summarised below:

The proposal supports Hills Neighbourhood Zone Desired Outcomes by providing a low-density residential form that complements natural landforms and rural edges, minimising disturbance to topography and existing vegetation;

- Continues the evolution of the locality towards residential development consistent with Victor Harbor's Urban Growth Management Strategy and the residential zoning of the site, aligning with General Development Policies for orderly development;
- Introduces a housing typology envisaged in the Hills Neighbourhood Zone (detached dwellings and ancillary community facilities) while maintaining low-density character (approx. 20 dwellings/ha);
- Provides an alternative and attainable housing option for over-50s through a land lease model, supporting broader planning objectives for housing choice and ageing-in-place;
- Meets Design in Urban Areas policies of the Code by delivering a contextual, inclusive and sustainable layout:
  - Central clubhouse and linear park promote walkability and social interaction;
  - Avoids a “gated” appearance with permeable fencing and landscaped buffers, ensuring visual permeability and integration with the locality;
  - Built form complies with Code policy (predominantly 1 level homes, max 2 levels/9m on the central Clubhouse), ensuring low-rise character and minimal visual impact;
- Stormwater strategy satisfies Water Resources Overlay provisions, incorporating detention basins, bioretention systems and rainwater reuse to achieve WSUD principles and pollutant reduction targets;
- Earthworks and retaining walls designed to minimise cut and fill, and screening retaining structures behind dwellings and landscaping to protect amenity;
- Comprehensive servicing strategy aligns with Infrastructure provisions, ensuring water, sewer, electricity and telecommunications are provided to required standards;
- Complies with Transport, Access and Parking DO 1 and PO 1.1 by maintaining safe and efficient traffic conditions, with SIDRA modelling confirming Level of Service A at all intersections.
- Internal roads and dual access points meet Code policy, facilitating emergency egress and fire appliance access; parking provision exceeds Code requirements;

- The proposal satisfies Hazards (Bushfire – Medium Risk) Overlay provisions though:
  - BAL 12.5 construction for all dwellings;
  - Two access points for evacuation and emergency vehicles;
  - Shelter-in-Place facility with firefighting water supply;
  - Bushfire Emergency Management Plan aligned with AS3745:2010; and
- Native vegetation clearance is limited to nine immature River Red Gums assessed as Level 3 under the Native Vegetation Regulations 2017; with no threatened flora recorded and the impact mitigated through a SEB payment and replacement planting.

Overall, the proposed development warrants Planning Consent, subject to reasonable and relevant conditions and referral requirements.