NORA CREINA GOLF COURSE AND TOURISM RESORT

MAJOR PROJECT

PUBLIC ENVIRONMENTAL REPORT

prepared pursuant to Section 46C of the Development Act 1993

Proponents: Justin Scanlon and Damian Scanlon

JANUARY 2016

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1. INTRODUCTION

The proponents, Justin and Damian Scanlon, who own four large coastal allotments of land at Nora Creina were approached in late 2011 by Greg Ramsay to discuss a concept of a golf course and related tourism venture for the site.

Mr Ramsay is one of the key people responsible for the highly successful Barnbougle Dunes Golf Course on the north-east coast of Tasmania - now ranked as the top public course in Australia. Mr Ramsay saw a number of parallels between the Nora Creina land and Barnbougle Dunes and was of the view the Nora Creina site had all the necessary attributes for a world-class golf course.

The proponents then approached the District Council of Robe in July 2013 to discuss Council's support for such a project and the necessary steps that would be required to facilitate the project. It was obvious that although Council was enthusiastic about the project and the benefits for the community, it lacked the necessary resources and expertise to tackle what would be a difficult rezoning process.

A submission was then made to the Minister for Planning through the Department of Planning, Transport and Infrastructure (DPTI) in late 2013, which explained the concept of the project and the likely economic, social and environmental benefits to the State.

The Minister declared the project a Major Development on 14 February 2014 and it was gazetted on 4 March 2014. The relevant extract from the Government Gazette can be found in *Appendix A*.

With the highly successful model at Barnbougle Dunes to follow, if implemented as envisaged the proposal would be transformative for the local economy. The amount of employment that would be generated by even the early stages of the development would be significant for this region, with Robe and Beachport likely to be the main service centres and sources of labour.

A demand for add-on and value-add businesses would also be generated to help diversify the local economy and provide jobs right across a calendar year. Many businesses in the area, particularly in Robe, are extremely seasonal due to the summer influx of visitors leaving only limited opportunities outside that period.

With enormous potential to accommodate two world-class 18-hole golf courses, focussed squarely at the tourism market across Australia and the world, the development would put the region firmly 'on the map' and provide a greater opportunity to showcase all the existing attractions including food, wine and outdoor activities, which would be of benefit to the South-East generally and particularly for the Limestone Coast and the Coonawarra.

As well as the golf courses, the proposal also includes other components to entice a wide range of tourist demographics to the location, including a function centre, a high-end 'wellness retreat' and the novel idea of promoting the food and wine produced on-site as part of the restaurant's offerings. The restaurant combined with an on-site cellar door and gourmet food outlet will also provide a platform for the promotion of food and wine providers across the region. The strong Aboriginal heritage ties to the land and the region generally will also be recognised through the incorporation of an education centre and various walking and interpretative trails throughout the land.

With a large regional airport at Mount Gambier (about an hour's drive away - a similar distance to Launceston's airport from Barnbougle Dunes), access to Melbourne and Sydney would also be

straightforward, albeit with some upgrades (largely identified by the local Council) to the existing airport likely . In the longer term an upgrade of the local airstrip or perhaps the incorporation of an airstrip on the subject land (as has occurred at Barnbougle Dunes) is also a likely outcome.

Such a high-quality tourism asset would also work to strengthen South Australia's brand, particularly to international visitors including the as yet largely untapped Chinese market, giving yet another reason for direct flights from China into Adelaide.

The proposed development has the strong support of the District Council of Robe and the existing Robe Golf Club and the Council is pleased the Minister has seen fit to recognise the major status of such a project.

Removal of Aquaculture Component

As noted throughout the document, the aquaculture component (land-based abalone farm) declared as part of the major project no longer forms part of the proposal. As a result of this there are a number of PER Guidelines which are wholly no longer applicable and as such have not been included in this document.

The affected Guidelines are:

5.1.5
5.1.6
5.3.25
5.3.33
5.7.25

It is also noteworthy that the removal of the aquaculture component from the proposal means that all of the proposed development is located on the freehold, private land and there is no incursion onto Crown Land nor into the ocean.

2. SUBJECT LAND AND LOCALITY

Justin and Damian Scanlon purchased the subject land on Nora Creina Road at Nora Creina in 2003. The subject land consists of four allotments, namely allotments 14, 200, 201 and 202. The total size of the land is approximately 425 hectares. Copies of the Certificates of Title for each of the four allotments can be found in *Appendix B.*

The land is located on the Nora Creina Road, approximately 15 kilometres (15 minutes drive) from Robe.

Lots 14 and 201 have frontage directly to Nora Creina Road, which is currently unsealed. Access to the allotments is currently via a driveway on Lot 14 and allotments 200, 201 and 202 all front the coast to give a combined coastal frontage of over three kilometres. A Marine Park has recently been declared along the full extent of this coastal frontage, with a Habitat Protection Zone specified.

The total area of the three coastal allotments is 300.4 hectares, which consists of approximately 75 hectares of cleared, grazing land and 225 hectares of dunes and beachfront land.

The land was originally purchased primarily for the purposes of constructing a 50-tonne capacity, land-based abalone farm. After a lengthy approval process, planning consent was finally granted for the abalone farm in 2008, with Development Approval obtained in 2010. At this time, the abalone farm has not been constructed and the investment profile and viability of the project has not yet been met.

Planning consent for two dwellings has also been obtained - one each for lots 200 and 201. The construction of these dwellings has been delayed pending the outcome of the Major Development process.

The locality is one of a rural coastal environment. The exposure to the Southern Ocean has created a windswept and rugged coastline with cliffs, reefs, beaches and sand dunes.

The average rainfall for Robe is 620mm per annum with approximately 300mm of that total falling over the winter months. The average summer daytime temperature is 22°C and 14°C in winter. The sea breezes that prevail over December and January bring with them ocean upwelling, mean the water temperature is substantially cooler than elsewhere in the State. There are days of extreme heat, but the location is well known to be much cooler than Adelaide.

The Little Dip Conservation Park is located directly to the north of the subject land and is owned by the Crown. Land to the south of the subject land is currently under a Heritage Agreement to protect its natural state.

On the other side of Nora Creina Road are a series of lakes, the largest being Lake Eliza. The lakes stretch along the coast towards Beachport and are part of the South East Coastal Salt Lakes Complex (as listed in the Commonwealth Department of the Environment Directory of Important Wetlands in Australia). The lakes provide habitat for migratory waders, shorebirds and waterbirds and are surrounded by cleared farming land stretching back to the next set of dunes some distance to the east.

Dwellings and buildings generally are scattered in the wider area. An existing dwelling is located on Lot 14 (approximately 1.1 kilometres from the proposed location of the clubhouse), as well as on the property immediately to the north (also about 1.1 kilometres from the proposed clubhouse location). Further afield there are sheds (non-habitable) located 1.3 and 1.4 kilometres from the proposed clubhouse location, and the next nearest existing dwellings are located 3.7 kilometres to the south and 6 kilometres to the north. There are no habitable buildings within the Little Dip Conservation Park and the settlement of Nora Creina is about 4.4 kilometres to the south. As such, it is clear the property is well separated from all sensitive receivers.

Due to its exposure to a harsh maritime environment, which generates a lot of strong off-shore winds from time to time, vegetation is generally scattered and of a fairly modest height.

A Marine Park has recently been declared along the entire extent of the coastal interface of the subject land, with a Habitat Protection Zone intended to be in place by October 2014.

The area is approximately 3.5 hours drive from Adelaide and about 1 hour from Mt Gambier, where air connections to Melbourne are available.

3. DESCRIPTION OF THE PROPOSAL

The conceptual design and site configuration for the proposal is shown below and contained in *Appendix C.*

The proposed development is centred around the establishment of a world-class golfing destination with the construction of two 18-hole golf courses, which is loosely modelled on the highly successful Barnbougle Dunes golf course near Bridport on the north-east coast of Tasmania. Bridport is a small coastal town not dissimilar to Robe and is situated near the Tamar Valley, which is a region also famous for its food and wine.

Just like the land at Nora Creina, Barnbougle Dunes had its first golf course laid out through coastal dunes with spectacular views over Bass Strait and quickly became the top-rated golf course in Tasmania. Barnbougle Dunes is currently ranked around 5th in the Top 100 courses in Australia and is now one of the Top 50 courses in the world.

A second 18-hole course, called 'Lost Farm' has now been constructed alongside Barnbougle Dunes and is also highly regarded. With players coming from all over the world to play the courses (including up to 200 charter flights a year directly to the site), the golf course complex, which also offers a restaurant, golf shop and accommodation, has transformed the local economy of Bridport and the surrounding region. A third course is now under construction.

The vision at Nora Creina is similar - not to build simply another 'good' golf course, of which South Australia has many, but to capitalise on the spectacular oceanfront dunes and build two great, world-renowned golf courses that will rank in the Top 10 courses in the country and firmly focus attention on golf in South Australia from both interstate and overseas.

The components of the proposal as envisaged as follows:

Golf Courses

The proposal at Nora Creina would see two 18-hole golf courses laid out over the dune area and a small part of the grazing area. The aspiration for the courses are for them to be in the Top 10 courses in Australia within a short time. The layout, shown indicatively on the attached concept plans prepared by Harrison Golf, would be a true links course and would seek to use the existing landforms and integrate and retain as much of the existing vegetation as possible. As a result some of the holes would have direct ocean frontage and views, which will be a crucial element in the appeal, status and eventual ranking of the courses.

A clubhouse and pro-shop to service the golfing requirements of visitors to the site would be situated between the two courses as part of the main building complex, which is described in more detail below.

A practice range would be situated near the clubhouse to allow for golfers to warm up and practice. Several practice greens are also proposed for putting and chipping practice.

It will also be necessary for a number of small service buildings to be constructed at various points across the golf course to provide shelter, toilets, food and beverage facilities for golfers using the golf course.

Tourism and Function Complex

The buildings to cater for visitors to the golf course (including those staying overnight), which would also include a function centre, restaurant, a general store (including a cellar door and gourmet food sales) and administration would be positioned in a section of land identified between the two golf courses about 200 metres back from the seaward property boundary. The building will house all the non-accommodation components of the site (with the exception of the wellness retreat) and be strategically located to take advantage of views north and south across where the golf course and west across the bay and Southern Ocean.

The restaurant is intended to be a fine-dining experience drawing on local produce (including from the on-site beef farm and vineyard) and will also be open to the general public.

An Aboriginal heritage education centre will also be incorporated into the main building in recognition of the strong Aboriginal ties to the land the region more generally.

A 120-space car park would be situated behind this building to adequately cater for both daytime and overnight visitors.

Walking trails are proposed to take advantage of the spectacular lake and sea views, to allow for the appreciation of flora and fauna (particularly bird watching) as well as to view some Aboriginal middens on the land.

Wellness Retreat

A wellness retreat, incorporating treatment rooms, day spa and swimming pool will be located about 100 metres west of the main building complex closer to the bay. This will be a small, unobtrusive building, primarily for use by those staying on site designed to take in the best views of the coastline and promote relaxation and wellness.

Accommodation

There will be various types of accommodation provided across the site, with the primary complex consisting of a mixture of three to five star rated accommodation situated to the north of the main building. This will consist of a up to 60 individual units with construction likely to be staged as demand increases.

To cater for premium visitors to the site, two 7-star accommodation options will also be available with one located within the northern golf course and one within the southern course. The accommodation will be located roughly where existing planning consents are held for residential uses on Lots 200 and 202.

Beef Farm and Vineyard

As part of the 'value-add' experiences of the complex, it is proposed that a boutique vineyard and wagyu beef cattle farm would be established on the inland side of the site, which would provide local beef and wine for the restaurant and promote food and wine in the region more generally.

The precise size of the vineyard and beef farm is yet to be determined, however insofar as the beef farm is concerned it is intended that this be of a size (both in terms of physical area and number of head of cattle) such that the animals are able to graze in a sustainable fashion. Depending on the amount of excess water generated by the operations of the whole site it may be possible to have irrigated pasture, which might require fencing of the area involved into two or more paddocks to enable rotation to occur. There would be no slaughtering or processing of stock on the site.

Water Storage Facilities

The precise nature of the requirements for storage are unknown at this stage, but obviously water supply for the irrigation of the golf course and potable water for the accommodation and administration/tourist area will be necessary.

Arrangements are already in place to purchase water licences for groundwater extraction and all roof stormwater will be captured for use. Careful consideration will also be given to the re-use of grey water generated by the development.

It will also be necessary to store a sufficient amount of water for fire-fighting purposes.

Infrastructure

It will be necessary to capture and treat all sewage and other effluent on site, with a view to re-using water wherever possible. Stormwater runoff from hard areas such as the car park will be directed to detention/treatment areas and depending on detailed design may be available for re-use on the golf course or elsewhere.

It will be necessary to improve the existing mains electricity supply to the site as well as the capacity of telecommunications. A new access road from Nora Creina Road will also be required.

A number of internal roads, including throughout the golf course to enable access by maintenance and emergency service vehicles, will also be required.

Maintenance Compound

A maintenance area will need to be established to allow for the proper care and maintenance of the golf course and other facilities on site. It is envisaged this area would be unobtrusively located in the cleared area away from the main accommodation and administration area and will be clustered with wastewater treatment and other necessary operations and functions.

Abalone Farm

The abalone farm, which was the subject of a 2008 planning consent and formed part of the original Major Project declaration, no longer forms part of the proposal.

Nora Creina Golf Resort

Robe, South Australia

Golf Course Masterplan

Buildings designed by:
studio-gram pty ltd
suite 406
33 Pirie Street
Adelaide SA 3000

NORA CREINA GOLF RESORT

Scale: 1:4000 @ A1
Client: J. & D Scanlon
Date: 9th October 2015
Revision: For Review

Golf Course design by:
Harrison Golf Pty Ltd
Suite 1002, 275 Alfred Street
North Sydney NSW 2060

4. MAJOR DEVELOPMENT PROCESS - FROM DECLARATION TO DECISION

The Minister for Planning declared the project a Major Development pursuant to Section 46(1) of the *Development Act 1993*. The declaration was gazetted on 4 March 2014 and specified land at Nora Creina in South Australia's south-east as the site of a proposed development which the Minister is of the opinion is of major environmental, social and economic importance to the State.

The application for the development was formally lodged with the Development Assessment Commission (DAC) in June 2014.

The DAC subsequently determined that the assessment of the proposal would be subject to a Public Environmental Report (PER) process and published the PER Guidelines in October 2014. A copy of the Guidelines is contained in *Appendix D*.

A PER, as defined in Section 46C of the Development Act 1993, includes a description and analysis of issues relevant to the development and the means by which those issues can be addressed. The PER should detail the expected environmental, social and economic effects of the development. The PER must consider the extent to which the expected effects of the development are consistent with the provisions of any Development Plan, the Planning Strategy and any matter prescribed by the Regulations under the Act. The PER should also state the proponent's commitments to meet conditions (if any) placed on any approval that may be given to avoid, mitigate or satisfactorily control and manage any potential adverse impacts of the development on the environment. Further to this, any other information required by the Minister must be considered.

Following the lodgement of the PER it is released for a consultation period to allow for the Council, Government Agency and the public at large to comment. A public meeting must also be held during the consultation period. For this project such a meeting will be held in Robe.

Upon receipt of submissions and matters raised by Council, Government Agencies and the public and other relevant bodies, the proponent must then prepare a 'response document' which contains further comment and documentation responding to any issues raised and undertake additional investigations if required.

The Minister will then prepare an Assessment Report which will be made available to the public, the Council and notified in the press. As the proposal has been subject to a PER, the Governor is the relevant decision maker under section 48 of the Act, and may refuse or approve the proposal.

The following sections of this document (sections 5 to 14) address all of the issues contained within the Guidelines for the purposes of the public and agency consultation period pursuant to section 46C of the Act.

A reference table has also been prepared to enable easy reference between the published Guidelines and the location of the relevant information within this document. The reference table is contained in *Appendix E*.

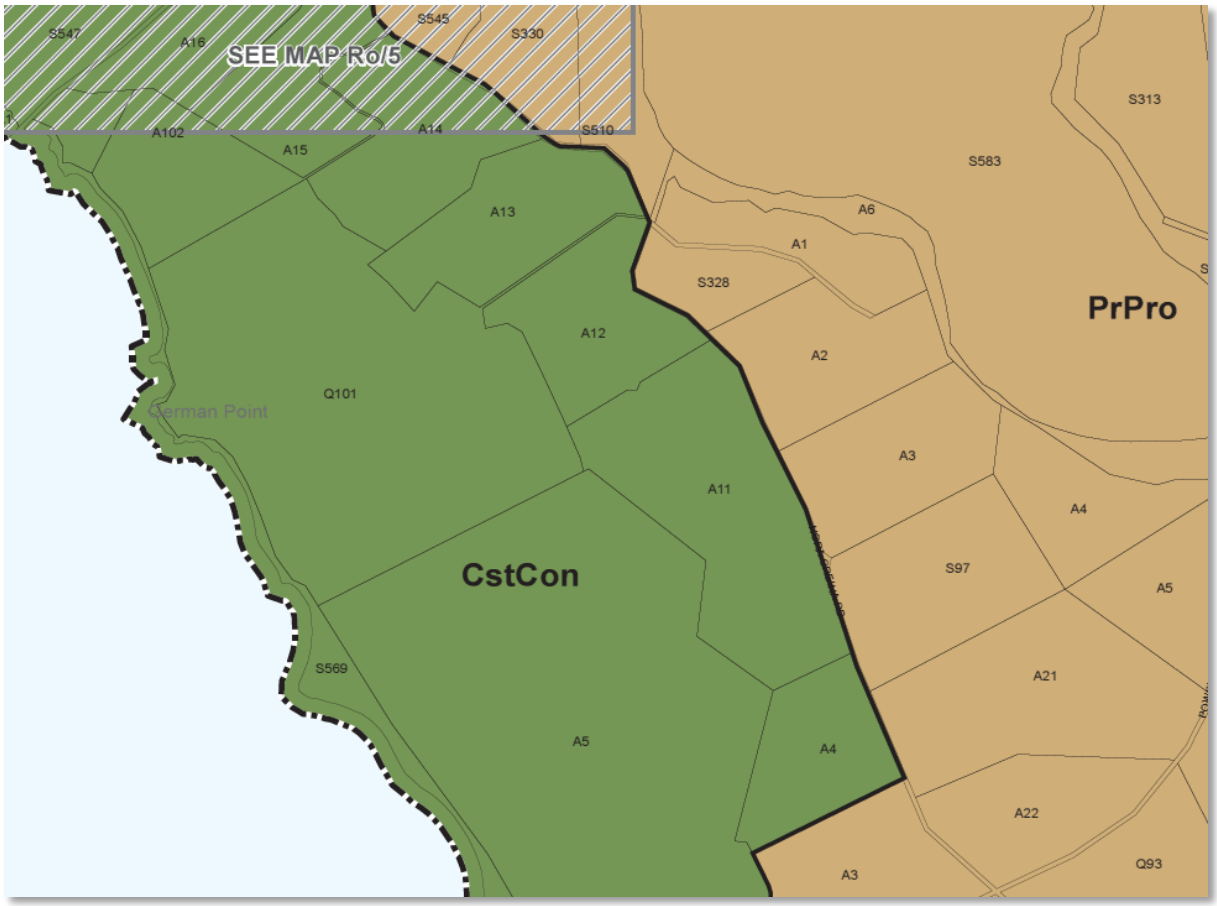
5. PLANNING AND ENVIRONMENTAL LEGISLATION AND POLICIES

(PER Guidelines 5.1.1 - 5.1.12)

The proposal has been assessed against the relevant existing planning and environmental legislation and policies of the District Council of Robe, South Australia and the Commonwealth, as set down in the PER Guidelines.

District Council of Robe Development Plan

The subject land is located in the District Council of Robe and wholly within the *Coastal Conservation Zone*, as shown on the Development Plan extract below (allotment 14 and German Point marked).



The Objectives for the *Coastal Conservation Zone* are:

1 *To enhance and conserve the natural features of the coast including visual amenity, landforms, fauna and flora.*

2 *Low-intensity recreational uses located where environmental impacts on the coast will be minimal.*

3 *Development that contributes to the desired character of the zone.*

The Desired Character states (in part):

> *Because of the level of human intervention in clearing land for agriculture, the coastal areas and dunes systems remain in a largely natural state and provide an important source of habitat and plant diversity.*
>
> *The coastal areas are sensitive to human activity and are subject to the impacts of sea level rise and coastal erosion. As such, the zone requires careful and strict management practices.*
>
> *Land in the zone will be retained in a natural state with protection of coastal dunes, cliffs, geological features and associated native vegetation being paramount. Agricultural activity will be limited to existing cleared areas and cliff tops and sand dunes will be excluded from development.*
>
> *The siting of buildings associated with farming pursuits will be limited to existing cleared areas and the replanting of native vegetation common to the area will be required.*

The subject land, despite its initial appearances, is not in a 'largely natural state' and the dune system has significantly modified such that many of the dunes run perpendicular to the coast rather than parallel. This part of the coastal dune system was also cleared for agricultural purposes and has recovered somewhat but remains at high risk from weeds and exotic plant species, as well as no formal land management practices.

However, the proposal will assist in achieving the implied aspirations of the statement, including improving flora diversity and fauna habitats, siting of buildings in existing cleared areas, replanting of native vegetation and the implementation of careful and strict management practices.

As such, the proposal has the potential to provide the means by which this part of the coast can be enhanced and made more environmentally sustainable.

The golf courses laid throughout the dune system can comfortably be defined as a 'low-intensity recreational use' and one which not only has minimal impact on the coast but provides the basis on which to improve the existing environment.

The Zone Principles of Development Control further the work of the Objectives and refer to the specific outcomes sought. Although there are elements of the proposal which are not envisaged in the zone (discussed further below), the proposal does meet the intent of the zone Principles with respect to:

- providing a sound basis for conservation work, including interpretative signage;
- the development being designed and sited to be compatible with conservation and enhancement of the coastal environment and scenic beauty of the zone;
- not adversely impact on the ability to maintain the coastal frontage in a stable and natural condition;
- minimise vehicle access points;
- provide landscaping using locally indigenous species; and
- providing controlled public access to the coast (walkways and fencing).

In terms of developing the buildings associated with the tourism resort (main building, wellness retreat, accommodation, maintenance and other infrastructure) it may become necessary, to ensure

certainty into the future and particularly once the Major Development declaration is lifted, that changes be made to the Development Plan.

Without investigating it in great detail, it seems rezoning to allow for tourist accommodation and tourism related ventures on the site would be appropriate. It might also be worthwhile considering whether rezoning for the golf course component is required, but once established the golf courses should be able to function within the current policy framework *Coastal Conservation Zone*, perhaps with a new policy area or additional zone policy.

An extract from the District Council of Robe Development (consolidated 28 August 2014) showing the *Coastal Conservation Zone* provisions can be found in *Appendix F*.

Development Plan General Provisions

The discussion above of the zone provisions and the way in which the proposed development can enhance the environmental outcomes are reinforced by many of the provisions in the General Section of the Development Plan, in particular:

Coastal Areas

Objectives 1, 3, 4, 5, 6, 7, 8, 9.

Principles 1, 2, 3, 4, 5, 8, 9, 12, 13, 15, 16, 29.

The proposed golf course represents a relatively low-intensity use of the coastal land in question, with the main built form on the existing cleared farming land. As discussed above, the proposal will allow for appropriate land management practices to be introduced to improve and enhance the existing native vegetation on site, particularly in the dune system.

Hazards

Objectives 2, 5.

Principles 1, 2, 8, 9, 14.

The site is at minimal risk of flooding from sea level rise and the bushfire threat to the main complex of buildings (including the accommodation area) can be minimised through design and access planning during the detailed design stage. The dune system is very stable and will become even more so through the combination of the golf course and an improved land management system.

Infrastructure

Objectives 1, 4.

Principles 1, 2, 6, 7, 8, 10, 11, 12.

All infrastructure requirements have been considered and the necessary upgrades and improvements can be installed and/or brought to the subject economically. There will be a focus on the harvesting and re-use of water on site and renewable energy to supplement mains electricity.

Natural Resources

Objectives 1, 3, 5, 6, 7, 8, 9, 10, 13.

Principles 1, 2, 3, 4, 5, 6, 7, 26, 27, 28, 29, 30, 31, 32.

As discussed at length, work already undertaken has shown the history of the degradation of the site through clearing, burning and grazing and although there has been some recovery, plant diversity is low and there remains a high risk from weeds and exotic plants.

The proposal will provide the means to improve this situation and introduce robust land management practices to improve and enhance the local environment, particularly native vegetation. Locally indigenous species will be used for landscaping around the main building complex.

Tourism Development

Objectives 1, 2, 3, 4, 5, 6, 7, 8.

Principles 1, 2, 3, 4, 5, 9, 10, 11, 12, 14, 15, 16, 17.

The proposal is highly consistent with this part of the Development Plan, meeting the intent of all eight Objectives. It will greatly add to the range of accommodation and services available, adds vitality to nearby townships, increases the ability for visitors to stay and improves the natural state of its locality.

Waste

Objectives 1, 2.

Principles 1, 2, 3, 4, 5, 6, 10, 12, 13, 14.

The proposal will rely on the on-site collection, treatment, storage, disposal and re-use of wastewater and will do so in an environmentally sustainable way, but also place the necessary infrastructure away from the main activity areas.

Limestone Coast Region Plan

The District Council of Robe and the subject land is included in the Limestone Coast Region Plan, which sets out the policies and directions for the region.

The area is already recognised by the Region Plan as a key tourist destination for the State but seeks to build upon that base. The Region Plan promotes economic growth generally. The natural environment and its protection and enhancement, particularly of the coastal areas, is also a key theme in the document.

The proposal at Nora Creina will achieve the intent of a number of Principles and Policies set out in the document including:

Principle 1 - *Recognise, protect and restore the region's environmental assets*

Policies 1.2, 1.3, 1.5, 1.10, 1.13

Principle 8 - *Reinforce the region as a preferred tourism destination*

Policies 8.1, 8.4, 8.5, 8.6, 8.7

Accordingly, the proposal is generally consistent with the Planning Strategy for Regional South Australia, which highlights the South Australian Government’s support of development in regional

areas and seeks to strike a balance between development and conservation through carefully considered investigations and planning.

South East Regional Natural Resources Management Plan (2010)

The South East Regional Natural Resources Management Plan (SENRM Plan) is a comprehensive, four-volume document. The SE-NRM's vision for the region is *'Healthy landscapes for better living.'*

Although all volumes are relevant in some way, Volume 2 contains the Strategic Plan which sets out a number of goals or 'Management Actions Targets (MATs)' set for the next five, ten and twenty years. The subject proposal will assist in working towards some of those listed MATs, including:

A.1 Improving Native Vegetation

- Presently the subject land, much of which has recovered from extensive grazing and incompatible land practices over the last 10-20 years, is unmanaged and weeds in particular pose a threat to its continuing recovery and biodiversity. The subject land is large and there is no incentive (nor ability) for the owners to better manage the land in a more structured and holistic way - especially given there is a conservation park to the north and land under heritage agreement to the south. The proposal, although necessarily involving the clearance of some vegetation, gives not only the incentive but the financial ability to prepare suitable management plans, implement them and measure the outcomes against performance criteria. There is no doubt the project will be of net benefit to the improving the native vegetation on the subject land.

A.9 Managing Threatened Species

- The subject land potentially contains only a small number of threatened species and recognition of those species (whether they have been sighted or not) and their requirements will assist in the project having minimal impact on habitat whilst assisting in improving biodiversity.

A.11 Protecting Aboriginal Sites

- Extensive investigative works have been carried out in respect of Aboriginal sites on the subject land and as a result of recommendations the golf course and other parts of the development have been located away from the most important sites. More work needs to be done with the development of Heritage Management Plan but the proponent has already demonstrated bona fides in dealing responsibly with this issue.

B.6 Respecting Aboriginal Issues

- A number of consultations have already been carried out with the South East Focus Group and this will continue as the Heritage Management Agreement is prepared and finalised. The clubhouse building also specifically has an area set aside for the display of Aboriginal heritage and education, which recognising the importance of the land and the wider area.

C.2 Reducing Key Invasive Species

- Invasive species will be controlled as part of a management plan for the whole site.

C.4 Adopting Sustainable Irrigation

- The golf course will need to be irrigated, as will the vineyard and possibly the grazing areas for the beef farm. At the appropriate time in the process, detailed design and engineering will take place to ensure treatment, storage, disposal and runoff impacts are minimised or eliminated altogether if possible.

C.5 Re-using wastewater

- It is highly desirable that wastewater is re-used wherever possible, including on the golf course and vineyard. Detailed investigations into this re-use will occur at an appropriate time in the future.

C.8 Managing pests

- Pests will be controlled as part of a management plan for the whole site.

C.12 Increasing perennial plant systems

- This can form part of the management of the whole site by way of Management Plan to be prepared at an appropriate time.

C.17 Protecting land from erosion

- Stabilisation of the dunes and foreshore areas will be improved by way of vegetation management (including revegetation) and the installation of fairways and greens for the golf course.

D.6 Supporting biodiversity on private land

- Increasing biodiversity will be a key consideration of the Management Plan.

D.9 Protecting habitats through formal arrangements

- Once the final design of the golf course and other parts of the development are determined, it is likely parts of the site will be subject to heritage agreements to ensure protection in perpetuity.

D.11 Involving Aboriginal people

- A significant amount of consultation has already occurred with the relevant bodies and more will occur as the Heritage Management Plan is prepared and finalised. It is also anticipated that Aboriginal people will be particularly encouraged to take part in the operation of the site (ie. gain employment on the site).

D.12 Planning for Climate Change

- All buildings proposed for the site will be set back a suitable distance to ensure they are clear of areas expected to be impacted by sea level rise.

Although the SE-NRM are some way from implementing all of these measures, all of the goals listed above have already been actively considered and incorporated (to the extent they can be at this stage of the process) into the design and design intent of the proposed development. As well making good environmental sense, working towards those goals makes good economic and business sense for the proponents and future operators of the site.

Native Vegetation Act 1991

The Objects of the *Native Vegetation Act 1991* are set out in section 6 of the Act and state:

The objects of this Act include—

> *(a) the conservation, protection and enhancement of the native vegetation of the State and, in particular, remnant native vegetation, in order to prevent further—*
> *(i) reduction of biological diversity and degradation of the land and its soil; and*
> *(ii) loss of quantity and quality of native vegetation in the State; and*
> *(iii) loss of critical habitat; and*
>
> *(b) the provision of incentives and assistance to landowners to encourage the commonly held desire of landowners to preserve, enhance and properly manage the native vegetation on their land; and*
>
> *(c) the limitation of the clearance of native vegetation to clearance in particular circumstances including circumstances in which the clearance will facilitate the management of other native vegetation or will facilitate the sustainable use of land for primary production; and*
>
> *(d) the encouragement of research into the preservation, enhancement and management of native vegetation; and*
>
> *(e) the encouragement of the re-establishment of native vegetation in those parts of the State where native vegetation has been cleared or degraded.*

The proposal will have the effect (by way of the preparation, implementation and measurement of a suitable management plan) of conserving, protecting and enhancing native vegetation as well as allowing proper management to occur. The Objects specifically envisage circumstances where some clearance is required to enable management of other native vegetation, which is clearly the outcome desired by the subject proposal.

As much of the dune area has been cleared and degraded and in the past, assisting that area to further re-establish itself with greater biodiversity and fewer weeds and pests is clearly an outcome desired by the Act.

As such, the proposal is broadly consistent with the Objects of the *Native Vegetation Act 1991* and the preparation of a suitable management plan will enable these objects and outcomes to be furthered over time.

Limestone Coast and Coorong Coastal Action Plan (2011)

The Limestone Coast and Coorong Coastal Action Plan details a conservation assessment and coastal action plan for the coastal areas between the Murray River Mouth and the Victorian/South Australian Border. As such, the document is relevant to the subject land.

The recommendations of the document, as set out in the Executive Summary, which the subject proposal generally accords with (in similar ways to its achievement of the MATs from the SENRM Plan) include:

- devising a weed strategy/priority
- minimising the impact of introduced animals
- improving habitat resilience
- management of off-road vehicles on beaches, dunes and headlands
- climate change response
- conservation of valuable areas and species
- consult on, engage with and conserve Aboriginal sites

Accordingly it is considered the subject proposal aligns with the intent and spirit of the coastal action plan many of the recommendations will be implemented as part of the development to improve environmental outcomes on the land and along the coast

South Australian Tourism Commission 'Design Guidelines for Sustainable Development' (2007)

The South Australian Tourism Commission's "Design Guidelines for Sustainable Tourism Development" (2007) outlines a range of principles for sustainable tourism. The proposal is wholly consistent with these principles particularly in relation to the unique golf experience, upgrading the use of previously degraded land, diversification in the local economy and affording greater tourist accommodation range.

South Australian State Strategic Plan

The State's Strategic Plan sets out seven strategic priorities for the State. The proposal would assist in meeting the target of '*Premium food and wine from our clean environment by producing and promoting regional produce.'*

The proposal would also assist in attaining a number of goals and targets contained in the Strategic Plan, including:

> *Goal: We are known world-wide as a great place to live and visit.*
>
> *Target 4: Tourism industry – Increase visitor expenditure in South Australia's total tourism industry to $8 billion and on Kangaroo Island to $180 million by 2020 (baseline: 2002 for South Australia, 2008 for Kangaroo Island) Milestone of $6.3 billion total industry by 2014.*
>
> *Goal: South Australia has a resilient, innovative economy*
>
> *Target 35: Economic growth – Exceed the national economic growth rate over the period to 2020 (baseline: 2002-03)*
>
> *Goal: We develop and maintain a sustainable mix of industries across the state.*
>
> *Target 40: Food industry – Grow the contribution made the South Australian food industry to $20 billion by 2020 (baseline: 2001-02)*
>
> *Goal: All South Australians have job opportunities.*
>
> *Target 47: Jobs – Increase employment by 2% each year from 2010 to 2016 (baseline: 2010)*
>
> *Goal: We look after our land, rivers and wetlands.*
>
> *Target 69: Lose no species - Lose no native species as a result of human impacts (baseline: 2004).*
>
> *Target 70: Sustainable land management - By 2020, achieve a 25% increase in the protection of agricultural cropping land from soil erosion and a 25% improvement in the condition of pastoral land (baseline: 2002-03 and 2005-06 respectively).*
>
> *Goal: We care for our oceans, coasts and marine environments.*
>
> *Target 71: Marine biodiversity - Maintain the health and diversity of South Australia's unique marine environments (baseline: 2011).*
>
> *Goal: We are physically active.*
>
> *Target 83: Sport and recreation – Increase the proportion of South Australians participating in sport or physical recreation at least once per week to 50% by 2020 (baseline: 2011-12)*

Environment Protection Act 1993

The proposal and its detailed design in particular will have regard for all the relevant provisions of the *Environment Protection Act 1993* and related legislation. Specifically the proposal's construction, risk, operational and management documentation and systems will be specifically designed to ensure compliance with the requirements of all relevant environmental legislation and in particular compliance with the General Environmental Duty as required by section 25 of the Act and relevant policies.

To that end, the following environmental protection policy documents are acknowledged as highly relevant to the preparation of construction, risk and operational management plans for the project and site more generally, as well as for use during the detailed design stage for the golf course and associated buildings:

- *Environment Protection (Water Quality) Policy 2003*
- *Environment Protection (Noise) Policy 2007*
- *Environment Protection (Air Quality) Policy 1994*
- *Environment Protection (Waste to Resources) Policy 2010*
- *EPA Guideline - Bunding and Spill Management*

It is anticipated that the satisfactory preparation of the various management plans will be conditioned as part of any approval given to the project and will need to be completed prior to the commencement of construction on site.

EPBC Act (Commonwealth)

On 20 June 2014, the proponent submitted a Referral Notice for the proposal (i.e. proposed action) to the Australian Government Department of the Environment, in accordance with the Commonwealth EPBC Act.

On 18 July 2014, a delegate of the Commonwealth Minister for the Environment made a decision that the Nora Creina Integrated Golf Course and Tourism Development proposal requires assessment and approval under the EPBC Act (referral no. 2014/7249). This was because the proposed action is considered likely to have a significant impact on the following matter protected by the EPBC Act:

- Listed threatened species and communities (sections 18 and 18A)

A copy of the response from the Commonwealth can be found in *Appendix G*.

More specifically, reference is made to the 'Recovery Plan for three orchid species in South Australia and Victoria: *Caladenia richardsiorum* (Little Dip Spider-orchid), *Caladenia calcicola* (Limeston Spider-orchid) and *Pterostylis tenuissima* (Swamp Greenhood) and the National Recovery Plan for the Orange-Bellied Parrot (*Neophema chrysogaster*).

As some native vegetation clearance is proposed the Department's EPBC Act *Environmental Offsets Policy* is also relevant for consideration.

The Commonwealth of Australia has a Bilateral Agreement (Assessment) with the State of South Australia, under Section 45 of the EPBC Act, to accredit the South Australian environmental assessment processes. The agreement makes it possible to undertake a single assessment, following the South Australian environmental impact assessment processes, and minimise duplication between State and Australian governments. It has been decided the proposal will be assessed through the State assessment process under the Bilateral Agreement. Following assessment, the State of South Australia will provide an assessment report to the Commonwealth Minister for the Environment, who will then make a decision whether or not to approve the proposed action under Part 9 of the EPBC Act.

In accordance with the Bilateral Agreement (Development Act 1993 provisions), the proposal will undergo a streamlined assessment process in co-ordination with Australian Government Department of the Environment. This means there will only be one PER document prepared, one period of public consultation undertaken and one Response/Supplementary PER document (and possibly one Assessment Report) prepared to satisfy the legislative requirements of each jurisdiction.

The Australian Government Department of the Environment has had input into the preparation of these Guidelines in regard to issues related to the EPBC Act.

'Tackling Climate Change, SA's Greenhouse Strategy 2007-2020'

'Tackling Climate Change, SA's Greenhouse Strategy 2007-2020' is South Australia's planned response to climate change.. It provides a framework for all of South Australia's greenhouse targets and commitments to be met in a comprehensive and coordinated way.

South Australia is already a leader in the use of renewal energy and the proposal will strive in all aspects of its proposed construction, design and operation to adopt and promote the spirit and implement the State's planned response to climate change in order to 'tread lightly' in terms of its energy and environmental demands.

Detailed design of both the layout of the proposal and the built elements will take into account South Australia's planned response, as well as other legislation including the *Climate Change and Greenhouse Emissions Reduction Act 2007* and the *National Greenhouse and Energy Reporting Act 2007*, insofar as they are relevant.

6. NEED FOR THE PROPOSAL

(PER Guidelines 5.2.1 - 5.2.5)

Rationale

Golf tourism is a growing phenomenon throughout the world - in 2013 the growth was 9.3% and South Australia would have seen very little if any of that growth. The highest ranked golf courses in South Australia are Royal Adelaide at number 11, Kooyonga at number 26 and Glenelg at number 28. However, these courses are not public courses and access for non-members is highly restricted.

Other public resort-type golf courses such as McCracken, Links Lady Bay and Wirrina are not highly ranked and attract few visitors outside South Australia.

Golf tourists are a very high yielding segment, spending up to double compared with the average tourist and the relatively recent Barnbougle Dunes in Tasmania has become the number 1 ranked public access course in Australia and is itself a significant golf destination. In recent times another highly anticipated golf course has opened at Cape Wickham on King Island in Bass Strait, which has again set very high standards with which Nora Creina will need to compete.

The proposal also includes accommodation, a restaurant, wellness retreat (a high yielding segment growing in popularity), the promotion of local produce, as well as a range of other activities such as nature trails, bird watching, swimming etc. for those who don't play golf.

From an economic and market perspective, the subject proposal is a type of destination and product that is highly sought after by domestic and international tourists and is something South Australia simply does not currently have. As such, the opportunities are huge and having seen the success of Barnbougle Dunes (which is now constructing its third course) it is anticipated this can be replicated and even improved on at Nora Creina, creating jobs and opportunities for other established businesses in the area, such as wineries and other tourism providers.

The subject land at Nora Creina is quite unique in that it is a large, privately held parcel with direct frontage to the coast and is relatively unencumbered. It has been used extensively in the past for grazing activities, including in the dune area. However, due to past grazing and clearing of the land this is not a pristine, untouched piece of land and there are some land management issues that cannot be easily dealt with because of the size of the property and the resources of the landowners.

The standard set by other courses in similar locations around Australia and the world is already very high and continues to edge higher. Barnbougle Dunes is very highly ranked and continues to expand and improve its product to ensure it retains its high ranking and popularity. The recently opened Cape Wickham course on King Island has ensured the standard remains very high and will be direct competition for Nora Creina. As such, it cannot be overstated that the Nora Creina proposal must produce a great golf course, not just a good golf course. If not, it will fail to gain the level of recognition it requires to be successful in the national and international golfing tourism space.

The establishment of a golf course and associated facilities on the site, which will occupy around only 25%-30% of the dune area, will allow for intensive management of the balance of the site,

including native vegetation, fauna and Aboriginal heritage. This will allow weeds and pests to be dealt with and a great deal of revegetation and dune stabilisation to occur.

From an environmental perspective, this large parcel of disturbed land, which has a range of land management issues is ideal for the siting of a facility that will allow for the land to be properly cared for.

Employment is South Australia, and in particular regional South Australia is always very important. The construction and operation of the golf course proposal will generate a significant number of jobs for the local economy - and do that across the year, not just in the peak summer season similar to many jobs in the area - and create a tremendous opportunity for other tourism businesses in the region, as well as food and wine producers.

From a social perspective, the golf course project is very significant and will help underpin the future of Robe and surrounds.

Selection of Proposed Location

The proposed location has been chosen because the owners of the land have sought out different options for the use of the land, including residential, land-based aquaculture and now a golf course. This project has not come about by way of an investor/developer having a golf course in mind and then finding somewhere to locate it. As such, no other locations have been considered for the project as this is the only location under the control of the proponents.

The scale of the project is large enough to provide all the necessary things associated with two 18-hole golf courses (such as accommodation, restaurant, etc) but in terms of the overall site is relatively modest in size. Part of the cleared farming land is also being used for a vineyard and beef cattle farm as a 'value add' part to the main golf course component, which will promote the food and wine of the region.

An exclusive wellness retreat, located close to the ocean, will also feature as a key 'non-golfing' drawcard for the site, with the tourists who seek out such facilities spending much more than the average visitor. This component is expected to be a highly sought after and helps to diversify the appeal of the development to a wide range of interests and demographics, including those who may be accompanying golfers to the site, as well as drawing in its own clientele.

Staging of the development is unknown at this stage and will depend on future detailed financial modelling. It is possible that only one course will be developed initially with the second to follow a few years later or it might be more economic to build both courses at the same time.

The location of the subject land is within easy reach of Adelaide and Mount Gambier and therefore easily accessible to domestic and international visitors (especially from South Australia and Victoria).

Anticipated Demand

It is expected the golf course will reach levels of 30,000 rounds of golf per annum, which is a similar number to Barnbougle Dunes, but has the advantage of having a warmer climate, being on the mainland and in a significant tourism region.

Expected Local, Regional and State Benefits

The local benefits cannot be overstated and include employment, increased visitor numbers and improvements to some infrastructure and better land management outcomes.

The regional benefits are expected to be drawing a greater number of tourists to the region, with significant implications for existing food and wine businesses as well as other tourism-focussed businesses.

The State benefits are likely to be that the golf course becomes a show piece in attracting tourists to the state and region, which will help reach the aspirational goals set for tourism expenditure in South Australia.

'Do Nothing' Option

If an approval for the golf course is not given for the land it is likely the proponents will construct holidays homes on at least two of the four affected land parcels. The balance of the land would then 'miss out' on a comprehensive land management regime and the current situation, whereby the owners can only do so much on such a large parcel, would continue.

A 'do nothing' option would be disappointing for the subject land and its owners, but has much wider (and likely negative) implications for the local and regional economy.

7. ENVIRONMENTAL IMPACTS

(PER Guidelines 5.3.1 - 5.3.47)

The subject land consists of four allotments, namely allotments 14, 200, 201 and 202. The total size of the land is approximately 425 hectares.

The dune system on lots 200, 201 and 202 has been highly modified over a number of decades, primarily due to grazing and land clearing. These uses appear to have resulted in the wholesale movement of the dunes to positions almost perpendicular to the coast, as opposed to the parallel alignment as can be observed elsewhere along the coast.

The changes to the dunes caused by grazing has also greatly impacted the remnant vegetation that would have once occurred across the dune system. Examination of historic aerial photographs of the land dating as far back as the early 1950s reveals that almost no vegetation existed in the 1960s and 1970s on what is now lot 202 and lots 200 and 201 were significantly degraded.

Since the late 1990s, grazing has been controlled and then ceased in the dune system through the fencing off of this area. The vegetation has recovered somewhat during that time which has worked to stabilise the dunes, although only the more persistent and opportunistic native plants have returned to any great extent. A previous owner of the land also planted many exotic species across parts of the dune system and weeds have also invaded some areas (including by some proclaimed weeds).

A timeline of the aerial photos described above is shown in *Appendix H.*

As such, the dune system, whilst still very attractive in context with the coastal setting, and highly suitable for a golf course, has not been a location with pristine and undisturbed native vegetation for many decades and the diversity of native vegetation has also been permanently degraded. The proposed development provides an opportunity for improvements to the vegetation through the

removal of weeds and pests, protection of the majority of the site and revegetation and restoration programs.

Allotment 14 is approximately 51.12 hectares in size and currently provides the access driveway from Nora Creina Road. Lot 14 is primarily grazing land but also has two lakes which were fenced off from grazing activities as part of a restoration plan (in cooperation with the Department for Environment and Natural Resources) and now support a diverse range of flora and bird life. These lakes will be bounded by the proposed golf course and be 'featured' as part of the design, including with nature trails and the like. A copy of the restoration plan can be found in *Appendix I*.

One of the existing lakes

There is no desire to modify the existing landform to any great extent - this is not the point of such a location and is costly to do so. While there will be some requirements to have flatter areas or tracks and trails for vehicles and pedestrians, such is the amount of land available and the ethos of the golf course layout, the design will work with the existing landforms to lay the golf course out in harmony with what is already there, including denser and more diverse areas of vegetation.

As such, there will be a requirement for clearance of native vegetation, but there will also be a great opportunity to introduce more intensive land management practices across the land to greatly improve the quality of the vegetation and the habitats available for flora and fauna. This would address the problems associated with the introduced exotic plants and weed problems and once the golf course layout and the location of other buildings and infrastructure is finalised there is also likely to be a significant opportunity to place most if not all of the balance in a Heritage Agreement to formalise its status and long-term management.

As noted above, Nora Creina draws inspiration from the existing and highly successful Barnbougle Dunes in north-eastern Tasmania which is similarly constructed in sand dunes immediately adjacent

Bass Strait. More recently another course at Cape Wickham on King Island has opened which is also of a similar construction. In both cases, and as will be the case at Nora Creina, significant modification of the existing landscape is not only not required, it is not desired. Although there is some shaping required, the golf courses are essentially laid out in the valleys of the dunes. Some images of Barnbougle Dunes and Cape Wickham are shown below.

Barnbougle Dunes

Barnbougle Dunes

Barnbougle Dunes

Cape Wickham, King Island

Cape Wickham, King Island

Native Vegetation & Native Fauna

Native vegetation is obviously a key consideration on the subject land, particularly in the coastal dune system where most of the golf course and associated buildings are proposed to be situated.

As shown on the concept plan, the amount of land available in this coastal area is very large compared with the actual requirements for fairways and greens - at this time it is estimated that about 25-30% of the total area within the dune section of the subject land will need to be cleared to some extent to accommodate all 36 holes of the two golf courses as well as the associated buildings.

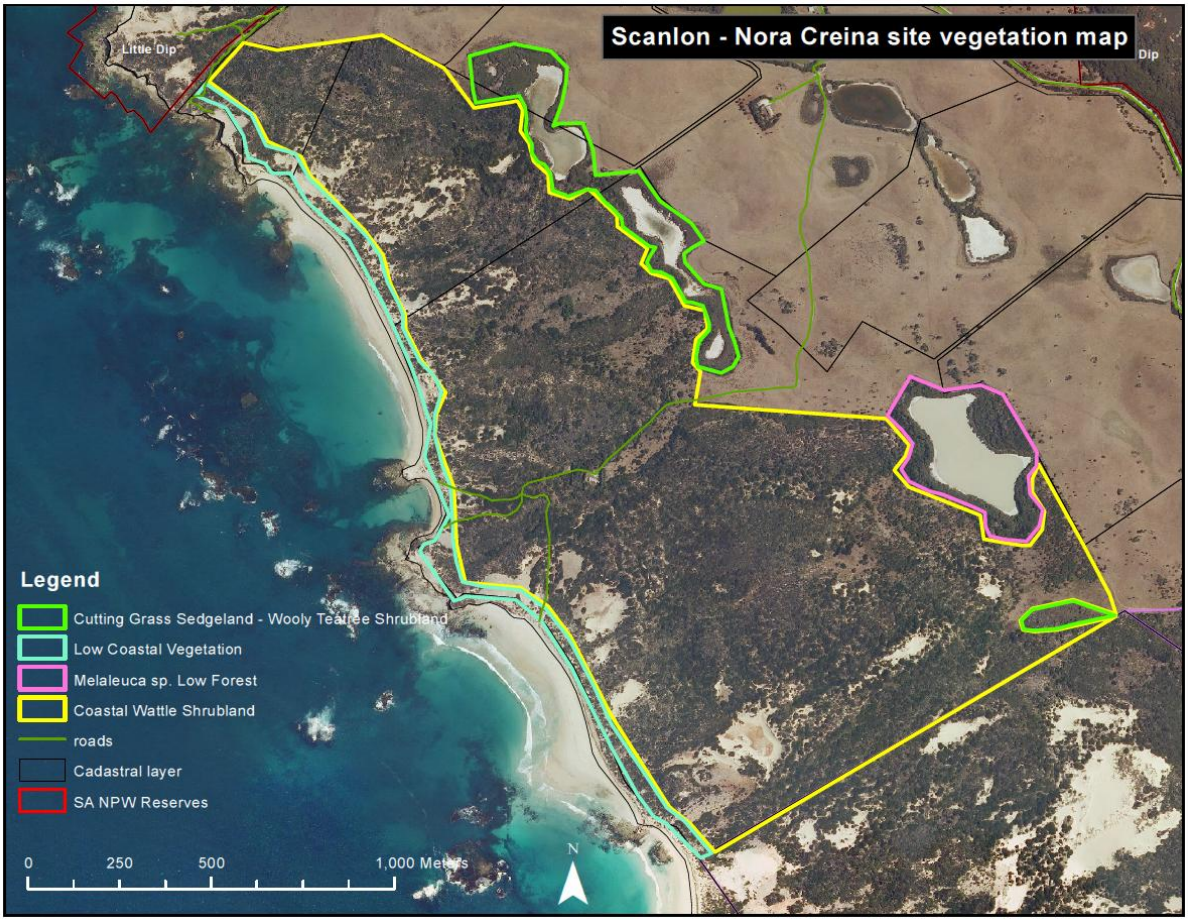
A preliminary 'baseline' survey was completed by Barron Environmental for much of the site in May 2014 which revealed a relatively homogenous level of native vegetation which is dense in places but with a low level of diversity. Specifically:

- a total of 82 plant species were recorded, of which 34 (approx. 40%) are introduced, either as invaded weeds or planted by the previous owner

- For a site of this size, in this region and for this length of time in survey, this result was considered to be a relatively low level of species diversity, with a relatively high proportion of introduced species. No species had particular conservation significance, although two vegetation association do.

- The total groundcover is characterized by the following types in approximate proportions:
    - 80% Native vegetation cover (generally very dense, especially on dunes);
    - 10% weed or introduced (planted) cover;
    - 10% bare ground, rock, tracks, wetland/water etc.

- The vegetation cover was characterised as follows:
    - Coastal wattle (*Acacia longifolia sophorae)* dense shrubland– 80%;
    - Coastal daisy bush (*Olearia axillaris)* & Ridged bush-everlasting (*Ozothamnus decurrens)* dense low shrubland – 10% (Coastal fore-dune & fringe);
    - SA Swamp Paperbark (*Melaleuca halmaturorum)* and Dryland Teatree (*Melaleuca lanceolata)* Low Open Forest – 5% (eastern lake fringes);
    - Cutting grass (*Gahnia lanigera)* sedgeland & Woolly Teatree (*Leptospermum lanigerum)* Shrubland – 5% (western inland wetland fringes); (Endangered in DEWNR provisional list).



A previous landholder has established numerous small plantations of mostly introduced species, within the native vegetation, which are still surviving and, in some cases, spreading as woody weeds along with invading African Boxthorn. These woody weeds will continue to spread if left uncontrolled. Introduced Rabbits and European fox were also observed and are also contributing to an ongoing biodiversity, soil and weed degradation threat to the wider area.

The plantations are often characterised by Norfolk Island Pine, Cypress Pines, Tuart Gums, among others, and are in varying degrees of condition and vigour. It was recommended to retain at least the larger trees as interim tall habitat structure (except spreading weeds), especially as roosting habitat for the Critically Endangered Orange-bellied parrot. This latter species may use this area in its winter migratory route between Tasmania and SA.

With reference to historical aerial photography there is substantial evidence for much of the site being highly degraded and disturbed by eroding mobile dunes, possibly caused by a combination of burning and over-grazing, as well as land clearance in the recent past, before recovering to some degree. This conclusion is supported by only very few naturally occurring Sheoaks, Dryland Teatree or Coastal Mallee being observed, which I would normally expect to be common in the area, as either components of, or as dominant species in, various vegetation associations. Also, the remnant sand dunes and swales appear to be degraded and aligned perpendicular, rather than parallel, to the coast, as a probable indicator of erosion and mobility in the recent past.

The inland wetland areas appear to be in good condition and have a higher biological value than the remainder of the area and it is recommended they be protected from feral pests, weed invasion and significant disturbance. However, they could be managed within the context of sensitive eco-tourism activities (e.g. bird watching, board-walks/hides, kayaking).

Given much of the area has recovered from significant disturbance in recent times, but remains in a degraded condition at the risk of being over-run by woody weeds with ongoing threats to the biodiversity of the area, it was considered the site would benefit from a from a more structured approach to land management, which can also happen in harmony with the proposed development.

A copy of the 'baseline' survey can be found in *Appendix J.*

Two 'Spring survey' were also completed in October 2014 as follows:

- 8th & 9th October (2 days x 2 people) – specific threatened flora species search (especially for the Nationally Endangered *Caladenia richardsiorum*, Little Dip Spider-orchid), completed by Barron Environmental; and

- 21st & 22nd October (2 days x 2 people) – follow-up of above and conduct “Bush RAT” survey method, completed by EAC Ecological Evaluation.

These surveys determined that the site is approximately 250 hectares in size with ecologists identifying up to 8 different vegetation associations in relatively good condition. One of these Associations is considered to be of state conservation significance (Brackish to Saline Tall Shrublands and Low Open Forest: approximately 23ha or ~10% of the site), however, as discussed below, this area is not intended to be disturbed in this proposal and is intended to be “set-aside” as a dedicated conservation area as a part of this project.

Although a high flora species diversity for this area was detected in the latter survey (up to 95 species), a high proportion of these were introduced species (up to 41 or >40%). Also, the area is providing habitat for at least 1 flora species of national significance (*C. richardsiorum,* Little Dip Spider-orchid (found in only one 30m x 10m patch, growing under introduced overstorey species) and 4 flora species of state significance. The patch of Endangered Orchids will also be “set-aside” and protected, as described below. Given the significance of this discovery a separate flora report on the Little Dip Spider Orchid was also prepared by Barron Environmental and can be found in *Appendix K*.

Caladenia richardsiorum (Little Dip Spider-orchid)

It is important to note that historical aerial photography demonstrates that the site has been recovering from severe degradation and erosion in the last 20-30 years, which is likely to have contributed to the high proportion of introduced species that are present and possibly the general lack of orchids that were detected.

The vegetation is also considered to provide habitat for at least 1 fauna species of national significance, the nationally Critically Endangered *Neophema chrysogaster* (Orange-bellied Parrot), and up to 14 fauna species of state significance, such as *Vombatus ursinus* (Common Wombat – Rare). However, habitat for many of these other species, such as: *Rattus lutreolus* (Swamp Rat), *Wallabia bicolor* (Swamp Wallaby), and *Antechinus minimus* (Swamp Antechinus) is in the wetland habitat intended for "set-aside" as discussed above. Taller roosting or resting habitat for the migratory Orange-bellied Parrot is only provided on site by exotic plantations of introduced species including Aleppo Pine (or other *Pinus* sp.), Norfolk Island Pine, Cypress Pines, and Tuart Gums (no taller native trees occur within the disturbance footprint of the proposal). Hence most of these will be retained to help maintain suitable habitat for this species, consistent with its National EPBC Act Recovery Plan.

Important mitigating considerations or actions that are expected to result in all species and communities affected by construction and operational activities on site recovering and contributing to a "Significant Environmental Benefit" include the following:

- At no point before, during or after construction will more than only approximately 25-30% of the area be cleared (and in most instances not completely cleared) and the remnant habitat area will remain relatively connected and unfragmented.

- the selection/placement & treatment of fairways, tracks, other infrastructure, should be undertaken in an environmentally sensitive manner, so as to minimise vegetation clearance, fauna disturbance and erosion.

- a significant proportion of the area affected by clearance will be allowed to regenerate and recover or be revegetated post construction, leave a net cleared area of approximately 20%.

- Once completed, the golf course will be maintained as exotic low grassland for greens and fairway – this in itself will maintain habitat connectivity and still have important open habitat value for native fauna, including as open feeding area for the Endangered Orange-bellied parrot and other species.

- The 'rough' will be maintained with naturally occurring regenerated local native grasses and groundcover species.

- As noted above, there are no tall native trees existing within the disturbance footprint of the proposal. However, where possible taller exotic planted trees will be retained as roosting habitat for the Critically Endangered Orange-bellied parrot.

- At no point before, during construction or operation, are noise and light levels expected to significantly impact native fauna.

- Invasive weeds and pest such as African Boxthorn, Gazania, Pyp Grass, Coastal Tea-tree and European Rabbits, as well as uncontrolled human traffic, will be controlled in retained native vegetation.

- Proposed 'set-aside' conservation areas:

  - Approximately 25 hectares of Swamps on the eastern edge of the site. These include *Gahnia trifida* Sedgeland & *Leptospermum lanigerum* Closed Shrubland in non-saline wetlands (Endangered in SA); as part of the Brackish to Saline Tall Shrublands and Low Open Forest Association: approximately 23ha or 10% of the site;

    - Regular monitoring of water quality (annual) and condition (biennial, via standard water sampling and 'BushRAT' methodology (latter already used & provides a baseline) will be implemented to monitor potential impacts of irrigation of the golf course.
    - Some fairways will overshoot this habitat, but the habitat will be considered "out of bounds" for golf and not disturbed before, during or after construction.

  - Approximately 0.25ha (50m x 50m) to fence-off and protect the only patch of *C. richardsiorum,* Little Dip Spider-orchid, found to date (patch is 30m x 10m). Other patches will be protected if or when found. The protection will be from unauthorised human access, as well from weeds and pests (excluding the introduced overstorey they orchids are currently growing under).

During the preparation of more detailed plans for clearance, revegetation and weed and pest management, the document *Guidelines for a Native Vegetation Significant Environmental Benefit Policy* (DWLBC 2005), along with the requirement of the South Australian *Native Vegetation Act 1991* will be consulted and drawn upon where relevant, along with the Commonwealth Department of Environment's EPBC Act *Environmental Offsets Policy* (DoE 2012).

These considerations are not expected to be inconsistent with any relevant EPBC Act guidelines, conservation advice and/or recovery plans, including the respective Recovery Plans for the Little Dip Spider Orchid and the Orange-bellied Parrot. It is also expected that this proposal will also result in a

positive outcome for the adjacent Little Dip Conservation Park and local Heritage Agreements, via maintenance of habitat connectivity and controlled weeds, pests and human/public access. Once greater detail is known during the detailed design component of the process, appropriate mitigation measures can be proposed to minimise threats and set out recovery and performance criteria which can be monitored over time.

It is anticipated that an Environmental Management and Monitoring Plan (EMMP) will be prepared to set out further details of many of the issues discussed above and the more detailed issues raised in the PER Guidelines. Preparation of such a plan would occur as part of the detailed design and preparation for construction, having sought the requisite expert advice, and would necessarily occur after approval is given for the proposal.

At this level of detail there would be precise information regarding exact locations and areas for clearance, the nature of the vegetation being cleared, the number of habitat trees to be maintained and cleared, weed and pest management and other similar matters. Such information would also assist in ensuring mitigation measures for known and potential threats to the Little Dip Spider-orchid and the Orange-bellied Parrot are set out along with recovery actions and performance measures.

As such, it is appropriate that preparation of the EMMP forms a condition of any approval.

A full copy of the survey undertaken by EAC Ecological Evaluation Pty Ltd can be found in *Appendix L*.

Coastal Environment

GHD was engaged to consider the coastal environment of the subject land - specifically PER Guidelines 5.3.22 to 5.3.28 inclusive. GHD's work included a site visit, research and reporting, resulting in the summary table and information below. The full details of the GHD investigations relevant to this section can be found in *Appendix M*, *Nora Creina Limited PER Investigations, September 2015*, sections 2.1 to 2.7 inclusive.

Impacts on Beach and Dune Forms

Being exposed to the Southern Ocean, the most productive ocean in the world, this section of coastline is routinely exposed to some of the most severe wind and wave conditions in Australia.

GHD concluded that, provided natural dune function (i.e. erosion) was allowed to continue, the construction of a golf course in the dune area *"would not be expected to affect beach behaviour".*

GHD also recommended that appropriately located and designated access paths, as well as fencing and landscaping to encourage their use, would assist in preventing damage to the dunes and calcarenite formations.

Sand Drift Remediation

The development will not interfere with wave or tide-driven coastal processes, including longshore drift. However, the wind-blown transport of sand is very common along this area of the coast with many blow-outs evident.

GHD recommendations to minimise the movement of sand by wind include:

- intensive revegetation with native species;
- dune fencing to trap wind-blown sand;
- pest management; and
- appropriately located and clearly designated pedestrian access across the dunes.

Erosion due to Sea Level Rise

The State's formal position on sea level rise is for a 0.3m rise by 2050 and 1.0m by 2100 (i.e. a further 0.7m from 2050-2100).

GHD has examined this criteria with respect to the subject site and using the Burn factor horizontal erosion was calculated to be in the order of 15m by 2050 and up to 50m by 2100.

There is no modelling data specifically for this stretch of coast but GHD compared it with the Discovery Bay coastline in western Victoria, where generic recession modelling has been undertaken. It was noted that the Limestone Coast has more frequent calcarenite outcrops, which

would help limit erosion impacts on beach shape and form and so erosion due to sea level rise at Nora Creina is expected to considerably less.

In any event, if any parts of the golf course are affected by erosion and/or sea level rise repairs and stabilising works can easily be undertaken with little impact on the continuing function of the golf course.

Impacts on Coastal Wetlands

The existing lakes on the subject land have already been the subject of significant conservation efforts and based on the feedback received from those undertaking the flora and fauna survey are in very good condition.

These values are recognised and highly prized by the proponents, who were directly involved in the conservation efforts, and as such it has always been the case that the lakes would be 'showcased' as part of the golf course and resort design.

With only a small part of the golf course planned to occur in close proximity to the lakes (which will still be subject to final detailed design), the primary issue will be that of protecting the lakes during the construction phase. How this will occur and the measures to be put in place will be detailed at the appropriate time in a Construction and Environment Management Plan (CEMP).

With the majority of the golf course and all of the buildings associated with it in the dune area and the vineyard and beef cattle farm in the already cleared area, there is a low risk of any direct or indirect impacts on the coastal wetlands.

Impacts on Conservation Values of adjacent land

Little Dip Conservation Park is situated to the north of the subject land, Lake Eliza is situated to the east and land over which a heritage agreement for the purposes of the conservation of native vegetation occurs directly to the south.

GHD assesses that, depending on the local groundwater regime, there may be the potential for some indirect impacts on Lake Eliza and there exists the potential for increased weed invasion into Little Dip Conservation Park and the heritage agreement area to the south.

The potential for either of these to occur can be greatly mitigated through weed controls documented in both the Construction and Environment Management Plan (CEMP) and also in the site's Operational and Environment Management Plan (OEMP).

Details of the proposed irrigation regime will also be detailed alongside the final detailed design for the golf course, which will require the engagement of a turf and irrigation consultant.

Impacts on Coastal Habitat

A habitat corridor of sorts links Little Dip Conservation Park to the land over which a heritage agreement exists to the south of the subject land. This corridor will be interrupted in some respects due to the construction of some components of the golf course, particularly roads and other cleared areas, particularly for ground-dwelling animals. The golf fairways and greens themselves and the fact

they are 'laid' through the landscape and minimise the clearance of vegetation will assist in keeping as much of the corridor in tact as possible.

However, as noted by GHD, no threatened or listed ground-dwelling animal species are likely to exist on the subject land and as such this issue is considered to be a manageable environmental issue.

Marine Environment

GHD was engaged to consider the marine environment in proximity to the subject land - specifically PER Guidelines 5.3.29 to 5.3.32 inclusive[1]. GHD's work included a site visit, research and reporting, resulting in the summary table and information below. The full details of the GHD investigations relevant to this section can be found in *Appendix M*, *Nora Creina Limited PER Investigations, September 2015*, sections 2.1 to 2.7 inclusive.

With respect to PER Guidelines 5.3.29 to 5.3.32, GHD noted the following:

- the marine productivity of the region is high due to the annual Bonney upwelling
- the area immediately offshore from the subject land contains heavy limestone reefs
- there is no seagrass directly offshore from the subject land
- current levels of disturbance is low

In terms of the potential for impact, GHD concludes the most likely pathways are as follows:

- human access to and from (and encroachment on) the beach
- stormwater and runoff releasing nutrients
- debris from land based activities getting into the ocean (i.e. plastics in particular)
- vegetation clearance and the loss of beach/dune

In recognition of these potential issues, the following will form part of the final design of the development:

- clearly marked and formalised beach access points, including measures to ensure there is no vehicle access to the beach and appropriate signage
- an irrigation and golf course management plan to minimise the use of herbicides, pesticides and fertilizers (although fertilizer is unlikely to have any material impact given the wave energy of the marine environment), as well as operational management plans for the beef farm and vineyard
- a focus on waste collection, containment and management (which must necessarily include education of guests) for the site through both the construction and operational phases;
- utilising a golf course type and design which minimising modification to the existing landscape and include fencing to prevent people from wandering into areas of higher value vegetation or animal habitat. Weeds and pests will also be considered as part of the relevant construction and operational management plans.

[1] As noted previously, Guideline 5.3.33 is no longer relevant due to the deletion of the abalone farm component

These measures should also ensure the proposed development has limited impacts on the Upper South East Marine Park, which has been declared off the subject land.

Geology and Soils

GHD was engaged to consider the geology, hydrogeology, soils and erosion processes associated with the subject land - specifically PER Guidelines 5.3.34 to 5.3.35 inclusive. GHD's work included a site visit, research and reporting, resulting in the summary table and information below. The full details of the GHD investigations relevant to this section can be found in *Appendix M*, *Nora Creina Limited PER Investigations, September 2015*, sections 4.3 to 4.11 inclusive.

With respect to erosion processes, GHD concluded the following:

- If natural dune function is allowed to continue and erosion due to wave action is permitted to occur, the development **would not be expected** to affect natural erosion processes.
- Turfing and irrigation of tees, greens and fairways, as would be expected on a golf course, will encourage stabilisation of the dune sands against wind erosion, and therefore blow-out development.

Table 1 Hydrogeology

Conceptual Element	Description
Relevant surface water features and drainage	The proposed project is situated within the Millicent Coast surface water basin. The surface geomorphology can be described as low lying, with parallel dune limestone ridges with intervening swamps. An extensive lake complex exists on the landward side of the coastal sand dunes, incorporating the salt lakes of Lake Eliza, Lake St Clair and Lake George in the proposed project area. Regional surface water drainage has undergone anthropogenic changes post European settlement. Namely, a number of regional surface water drainage networks have been developed, which input large quantities of fresh water seasonally into some coastal lakes (e.g. Drain M discharges to Lake George) (DEWNR / SMK, 2014). Outlet channels have also been cut into some of the coastal lakes to allow the regional drainage network to discharge to the sea.
Soil types	Soils around Nora Creina comprise silt and sand, with shell grit fragments. These soils comprise high sea level marine deposits.
Outcrop geology	Regionally, the Gambier and Murray Group Limestones outcrop in the higher inland plains to the east, with younger Coomandook, Bridgewater and Padthaway Formations outcropping in the low-lying flats, including Nora Creina. These sediments are interspersed with a series of northwest-trending remnant sand dune ridges, which run along the shoreline and form part of a barrier system that extends from Robe to Mt Gambier. The surface geology around Nora Creina comprises Quaternary marine deposits on the flat plains, consisting of sand, gravel, silt, clay and shell grit. Along the coastline, aeolianite consolidated beach sands and calcareous and siliceous dune sands are present (Geological Survey of South Australia, 1951 - Penola Mapsheet).

Groundwater and Site Contamination

GHD was engaged to consider groundwater and site contamination issues associated with the site - specifically PER Guidelines 5.3.36 to 5.3.41 inclusive. GHD's work included a site visit, a preliminary site assessment (in accordance with NEPM requirements) and reporting.

The Preliminary Site Investigation followed the standard requirements for such an investigation, all of which are detailed in GHD's report.

Ultimately the report concluded the following:

"The PSI has identified a number of potentially contaminating activities at the site which are considered unlikely to have potential impacts to shallow and deep soils as well as groundwater at the site.

"The site inspection undertaken by GHD (August 2015) provided no observable evidence of site contamination associated with the sites current use, and further the PCA's identified are not considered to pose a current risk to the site as either they occurred long ago in the case of weed spraying, or have not occurred in the case of cattle dips or a leaking septic tank. No sampling of soil or groundwater has been undertaken as part of this investigation."

With respect to existing groundwater and land conditions, GHD prepared the table below.

The full details of the GHD investigations relevant to this section can be found in *Appendix M*, *Nora Creina Limited PER Investigations, September 2015*, sections 4.3 to 4.11 inclusive.

Table 2 –Existing Groundwater & Land Conditions

Conceptual Element	Description
Relevant aquifer/s [3]	The aquifer of most relevance is the upper unconfined Quaternary and Tertiary Limestone Aquifer (known generally as the Unconfined Aquifer). This aquifer consists of calcareous sandstone and limestone. It incorporates the Coomandook, Bridgewater and Padthaway Formations in the low-lying flats, which are interspersed with a series of northwest-trending remnant sand dune ridges (SE NRM Board, 2014). The Unconfined Aquifer is potentially underlain by an aquitard comprising marl and carbonaceous clay deposits. The underlying lower Tertiary Aquifer is a confined sand aquifer that is likely to occur at depths greater than 290 m below ground surface.
Depth to water table (	Available desktop information indicates the depth to groundwater is likely to be less than 6 m below ground level (Department for Water and South East Resource Information centre, February 2012). DEWNR (2015) indicates a decline in water level of around 0.1 m to 0.25 m or less for the Unconfined Aquifer from 2013 to 2014.
Groundwater quality	Groundwater salinity averages around 1,000 mg/L TDS in the Unconfined Aquifer (DEWNR, 2012). On the coastal plain and inter-dunal flats, both the Unconfined Aquifer and the Confined Aquifer of the Lower Limestone Coast PWA were assigned a yellow status by DEWNR (2015) for 2014, indicating *"gradual adverse changes indicating a low risk to the resource in the medium term*". Groundwater salinity in the underlying Confined Aquifer ranges from 500 mg/L to 1,000 mg/L TDS (DEWNR, 2012).
Groundwater users	Groundwater is the major source of water for domestic, agricultural (irrigation), industrial and recreational (watering of golf courses) use in the South East region of South Australia (DWLBC, 2004). Groundwater is typically extracted from the Unconfined Aquifer for domestic, agricultural and recreational uses, with annual groundwater extraction in the order of 150,000 ML. The deeper Confined Aquifer provides township water supplies for six towns, including Robe. The Robe township water supply comprises six extraction bores, with annual groundwater extraction in the order of 15,000 ML.
Potential for GDEs [5]	The Robe to Beachport Coastal Lakes Complex are classified as key GDEs (DEWNR, 2012), while the more extensive lake complex incorporating Lake Eliza, Lake St Clair and Lake George are classified as High Value GDEs (DEWNR, 2012). These lakes are listed on the Directory of Important Wetlands of Australia (DIWA) and are identified as GDE (surface expression of groundwater) based on BoM data[5]. The Atlas of Groundwater Dependent Ecosystems considered the nature of groundwater connection as permanent or near permanent.

Sustainability and Climate Change

The principles of green star rated buildings underpins some fundamental aspects of the design concept selected for the site (also see section on Design Matters).

Examples of best practice green star rating features included in the concept are:

- Maximise cross ventilation within all building types
- Mono-roof planes allowing generous overhangs to reduce summer solar gain
- Building form is broken up with anti-spaces to allow patron protection from all weather conditions
- Berm/ turf roof to building forms increases insulation properties
- Material specified that can be maintained by the local community
- Materials specified that will patina and age with purpose further integrating development within the landscape.

Building orientation will be important, both in terms of energy efficiency and the ability to efficiently orient solar collectors, which will need to be balanced with taking in views of the ocean and surrounds.

Materials selected are low tech material like steel, timber and stone to reduce interstate resources. Where possible recycled material will be utilised.

Waste management will have a focus on recycling and resource recovery wherever possible, but it is likely there will be a need for some waste to be removed from the site. The details of how this would operate will be something for consideration during detailed design.

It will be necessary to capture all of the roof run-off from proposed buildings for use and re-use on the site and the capture an re-use of stormwater (where appropriate) will also form part of the detailed design considerations. On-going management of stormwater on the site will form part of the Operational Management Plan for the site.

It is highly desirable to generate electricity for use on site to both reduce the cost of extending mains power onto the site (i.e. if the overall demand for mains power can be reduced the cost of upgrades to existing infrastructure and the nature of its extension on the site will be reduced) and to reduce the carbon footprint of the proposed development. There is great opportunity for properly oriented solar collectors (on both the main buildings and the accommodation) and small-scale wind turbines.

8. ECONOMIC AND SOCIAL IMPACTS

(PER Guidelines 5.4.1 - 5.4.6, and 5.5.1 - 5.5.6)

An economic analysis of the project was performed by Hudson Howells strategic management consultants, which has experience with golf course projects as well as tourism accommodation proposals.

The key outputs of the report were:

- identification of a major stimulus to tourism in Robe and the broader Limestone Coast region;
- projections of the project's contribution to economic development for the region and South Australia in both the construction and operational phases;
- the number of full-time equivalent (FTE) jobs the project would create;
- how the project would attract additional business investment and interest from existing businesses; and
- the cost of infrastructure.

The key findings of the analysis are set out below.

Construction Phase

It is anticipated the golf course complex would be constructed over a 5-year period with a total expenditure of around $20 million, roughly made up of the following components:

- External Infrastructure – Services infrastructure and headworks including:
    - Power (SA Power Networks) - $3 million
    - Water (Artesian and Bore) - $0.5 million
    - Communications - $0.5 million
- Internal Infrastructure – Roads, footpaths, fencing, septic, etc. - $1 million
- Golf Course Development (Course 1) - $5 million
- Golf Course Development (Course 2) - $5 million
- Club House, Reception and Accommodation - $5 million

- **Total - $20 million (or an average of $4 million per annum over 5 years)**

During that time it is projected the construction phase would create 25 FTE jobs per annum in the Limestone Coast Region and 33 FTE jobs in South Australia overall. The contribution to Gross State Product will be in the order of $2.644M to $4.428M.

Operational Phase

Once operational, it is projected the golf course complex would attract an additional 228 international visitors per annum and an additional 4,3460 domestic visitors per annum for an increased spend of about $4.5 million.

Utilising the 'accommodation food services' industry sector to approximate operational economic impacts for the project achieving a similar number of rounds as Barnbougle Dunes in Tasmania achieves (30,000 golf rounds per annum), it is expected that 147 FTE jobs will be created for the region and 170 FTE jobs for the State, with a contribution to Gross State Product of between $11.741M and $17.462M.

Tourism Impact

The Nora Creina Project will be a major stimulus to tourism and investment in the Robe and broader Limestone Coast region. Tourism assets of this nature add value to the existing attractions of the region and it is expected that the project will attract both tourists who would normally visit Robe, plus new international and domestic visitors to the region. The development will offer immediate opportunities for investment in the Robe region itself and it is also expected to offer investment opportunities for existing and new businesses in Robe, the nearest service centre.

The scope of opportunities is expected to cover the needs of tourists and regional industries including wine and food, especially beef and aquaculture. The Nora Creina Development will complement existing tourism, industry and residential assets and will add significantly to the region's tourism assets. The project is also timed well to coincide with the marketing of a range of self-drive itineraries between Melbourne and Adelaide. This journey links the established tourist icon of the Great Ocean Road and products along the Great Southern Touring Route to Adelaide via South Australia's Limestone Coast, Murraylands, Adelaide Hills, Fleurieu Peninsula and Kangaroo Island regions. There is potential to sell touring products along this route to build the business profile of travel to the regions en-route.

Existing regional businesses, especially tourism and other commercial businesses in Robe plus surrounding wineries, fishing and aquaculture businesses, will benefit and have the potential to be enhanced by new opportunities that will arise from the Nora Creina Project.

Existing tourism and commercial businesses (e.g.: retailers, wineries, service providers, etc.) will all have opportunities to benefit from increased demand associated with new tourists. Other industries (e.g.: fishing, aquaculture, industrial, etc.) will benefit from improved demand and infrastructure associated with the development itself.

The project will also seek to attract a broad tourist demographic, including those who do not play golf or stay on site. The restaurant, in its combined role of the promotion of food and wine, will provide a level of dining and experience that will appeal to those on-site and more broadly. The function centre will be an attractive option for groups or companies given dining and golfing will be available on-site. The wellness retreat recognises a growing and high-yielding tourist segment that is under-provided for generally and certainly in the south-east region.

In addition to the above, there is an opportunity for the Robe community to identify potential future gaps in service provision that may represent future business development opportunities. Changing tourism demographics and demand profiles may represent opportunities for new or expanded services.

The full Hudson Howells report can be found in *Appendix N*.

Financial Viability

The financial viability of the project cannot reliably be determined until the project concept has been finalised, approved and fully costed. However, the pre-feasibility of the project has been measured and is constantly monitored as the concept and conditions are refined. Based on a range of criteria and assumptions, it is currently estimated that the project will break even on a cash basis by year 5 of the project, or year 4 of operations assuming a 1 year construction period. The key assumptions of this pre-feasibility analysis include:

1. Land Acquisition (or value), Headworks and Other Development Costs - $2.7 million
2. Pre-Development and Final Completion Professional Fees - $1.9 million
3. Construction Costs - $18.5 million including:
    a. 2 premium golf courses
    b. 60 two bedroom accommodation unit - golf course frontage
    c. 4 six star multi bedroom units
    d. Car parking
    e. Recreation facilities – pool, bbq, etc.
    f. Internal services
    g. Airstrip
    h. Contingencies
    i. Note: Construction costs exclude – Reception, Club House, Restaurant, Bar and Fitout as these are assumed to be supplied by others and is currently under negotiation with local and international investors.
4. Income is supported by the sale of accommodation units over 5 years along with net golf course revenue (i.e. exclusive of golf operating costs, maintenance, staff, etc.) based on 10,000 rounds per annum increasing over time to 30,000 rounds per annum (similar to Barnbougle Dunes in Tasmania) and an average gross green fee of $100 per round.

In terms of strategies in the event that the development is unsuccessful, this is no different than the normal risk to developers if they were constructing a manufacturing business or apartments. The development group ultimately appointed to construct the project will be selected through a robust process to ensure any group appointed has the financial resources to accommodate any unforeseen events or lower levels of financial viability. In other words, the project will be properly financially planned and will accommodate best, expected and worst case scenarios and appropriate due diligence mechanisms will form part of any contract or agreement.

Impact on adjoining Primary Production

Due to the size of the subject land, the nature and proposed location of most of the activities on the subject land (i.e. closer to the seaward boundary), and the nature of the properties adjoining to the north and south (i.e. Little Dip Conservation Park and land over which a Heritage Agreement is in place), there is little if any opportunity for the proposed development to impact on primary production in the area, which in any event is generally limited to grazing.

As such, it is not considered expected impact of the proposed development on adjoining primary production is a significant or material factor.

Impact on Existing and Future Sensitive Receivers

Existing sensitive receivers in the area are limited to the scattered housing, none of which will be materially affected by the proposal. The nearest dwelling is on part of the subject land (lot 14), the next nearest is on the property immediately north. Both of these dwellings are approximately 1.1 kilometres from the proposed location of the clubhouse. The next closest dwellings are approximately 6 kilometres to the north and 3.7 kilometres to the south. As such, impact on existing residences has been minimised and in any event it is not anticipated noise levels that would be considered a nuisance would be produced by either the construction or operation of the project as a matter of course or on a regular basis.

Impacts are expected to be limited to minor impacts from traffic and perhaps some noise during parts of the construction and low levels of traffic during operation. There is not expected to be any significant noise, dust, odour or light nuisance generated from normal operations.

In terms of introduced sensitive receivers, this limited to on-site accommodation (none of which is permanent), the wellness retreat and the 'clubhouse' building generally. However, once again there is no significant impact expected on any of these receivers as the nature of the land use is not one that generates unreasonable nuisances.

As such, it is considered the proposed development is well suited to the subject land and surrounding land uses in terms of having negligible adverse impact.

Impact on Heritage Items or Places

The proposed development will have no impact on heritage items, places or areas as none are located on or adjacent the site.

9. DESIGN MATTERS

(PER Guidelines 5.6.1 - 5.6.7)

With the preferred location of the 'clubhouse' (which also accommodates the restaurant, function area, pro-shop, education centre and administrative facilities) now decided, some preliminary consideration has been given to the type of architectural design that would best suit this landscape.

The design uses the site contours to drive the form and layout of the buildings, minimising the amount of earthworks and disruption of flora and fauna. To integrate the buildings with the landscape, the design morphs the landform up and over building roof forms, allowing for dune movement and creating an architecture that sits comfortably in the landscape.

The wellness retreat will be located in a separate building closer to the ocean, but its form will also reflect the same design ethos.

The 'club house' where most of the tourist activity and services would occur, including the restaurant and pro-shop, is shown below.

The buildings have been strategically positioned at key points throughout the site to minimise the visual impact from the site, whilst providing views over both golf courses and the coastline beyond. The buildings and landscape evoke the forms of the surrounding dunes, blurring the boundaries between the geometries of architecture and nature.

Various ESD principles will be put in place, such as water collection & filtration to be re-used within and around the resort. Where possible, materials will be locally sourced, and of a low environmental impact quality.

Materials have been selected for their suitability in a coastal environment and their ability to patina against the landscape. Weathered Steel, Glass and Timber are the predominate materials for the Roof, Façade & soffit of the Clubhouse.

The oxidisation of a weathering steel, such as ‘Corten’, will allow the clubhouse to sit comfortably against the dunescape as it changes over-time.

The accommodation, and other services buildings, will be clad in a timber suitable for coastal conditions, that will weather over time and reduce the lifetime maintenance requirements.

The image below shows how the club house and wellness retreat (centre right) might appear when viewed from the sea. The buildings will have views across parts of the golf course and the small bay and out into the ocean, giving visitors a full appreciation of the beauty and energy of the location.

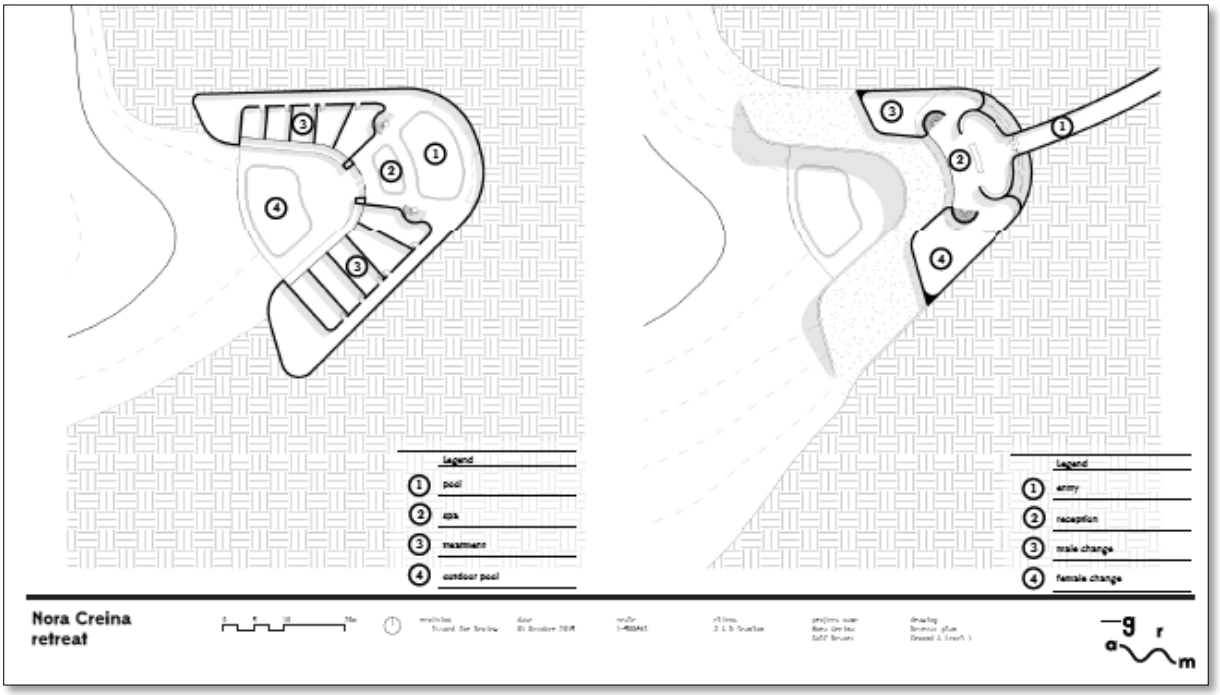
Where possible, all materials will be sourced locally and be environmentally sustainable.

The proposed building aims to integrate with the natural landscape especially with the use of locally indigenous plant species within or on building berm/turf roofs where possible. Walkways to be elevated where possible to allow minimal impact on natural flora by patrons.

The full architectural master plan can be found in *Appendix O*.

The images below show the indicative layout of the clubhouse and wellness retreat, which helps to give a better idea of the types of facilities to be available on site and how they might be integrated.


Legend
1 entry
2 aboriginal education & art centre
3 concierge
4 kitchen
5 female locker room
6 male locker room
7 club house
8 bar
9 restaurant
10 meeting
11 function
12 pro-shop / retail
13 workshop
14 back of house
15 male / female toilets
16 administration
Nora Creina
clubhouse


Legend
1 pool
2 spa
3 treatment
4 outdoor pool
Legend
1 entry
2 reception
3 male change
4 female change
Nora Creina
retreat

Accommodation Area

The images below show how the part of the accommodation might appear, as well as an indicative concept showing how the accommodation might be laid out and clustered together, giving a total of around 60 accommodation units. Construction of the accommodation units is one component which lends itself to being staged as demand becomes established and starts to grow.

10. INFRASTRUCTURE

(PER Guidelines 5.7.1 - 5.7.25)

The subject land currently has mains power connected and being outside an urban area has no mains water, sewer or gas connected. Further, no mains water, sewer or gas is within easy reach of the site.

As part of previous investigations in establishing a land-based abalone farm on the land some work has been completed into increasing the capacity of mains electricity on to the site.

It is not anticipated that mains water, sewer or gas will be brought to the site.

Telecommunications will be required as part of the operation of the facility, including for visitors and workers, as well as assisting with remote monitoring, Wi-Fi and other services.

Mobile phone coverage (and therefore wireless internet) is currently patchy due to terrain and as such in-building coverage in the dunes area is likely to be very unreliable. Wi-Fi services will help to alleviate that in the short term but in the longer term additional infrastructure will be required.

It is anticipated that the upgrade required for electricity to be brought to the site as well as the necessary improvements to telecommunications (especially wireless and/or mobile phone services) will have potential benefits for other users in the surrounding area and the general public.

Water

Mains water is not available to the subject land and it is not cost-effective to extend existing infrastructure to the site. However, a reliable water supply/source will be required for the operation of the golf course and other facilities.

Steps have already been put into place to purchase two existing water allocations (one of approximately 178kL and another of 52kL) which lie in the water management area. It will be necessary to simultaneously apply for new licence at the subject land and transfer the existing allocations to the new location. Enquiries have already been made of the relevant Government Departments and this procedure should be relatively straightforward.

Advice from the Department (DEWNR) also states:

> *"The application will require a Hydrogeological Assessment to determine if the proposed transfer meets Principles 8.2.200, 8.2.221 & 8.2.222 whilst also considering Principles 8.2.232, 8.2.233 & 8.2.234 in the Lower Limestone Coast Water Allocation Plan.*
>
> *"Of note are a number of High Value Groundwater Dependent Ecosystems (GDEs) situated on and near the proposed land parcels. As your application would be for the Confined Aquifer this should minimise any impact..."*

As such, it appears a sufficient and fit-for-purpose water supply is almost certainly available for the purposes of the establishing and maintaining the golf course and operating the resort, subject to any requirements associated with the transfer process. It is considered the risk of not being permitted to

access this resource has been minimised to the extent it can be at this time and it is unreasonable to expect the proponents to initiate the transfer process without an approval for the project in place.

It will also be a key objective to capture as much roof runoff as possible for re-use, thereby reducing the demand on groundwater resources. It is envisaged that most if not all of the accommodation areas will be serviced through rainwater harvesting. It is anticipated that roof run-off will not be allowed to mix with stormwater contaminated by hardstand areas.

Stormwater capture from hardstand areas (such as carparks and access roads) and its treatment and re-use (particularly for irrigation) will also be carefully considered during the detailed design stage of the development. It may also be possible re-use treated wastewater (particularly greywater), but this will be somewhat dependent on the type and size of treatment system required (discussed further below).

A sufficient amount of water for fire-fighting purposes will also be required, with the quantity and location/s of fire-fighting tanks to be determined in consultation with the Country Fire Service at the appropriate time.

An Irrigation Management Plan will also be devised as part of the detailed design, construction and operation of both the golf course and vineyard to ensure the use of nutrients and chemicals is minimised and is not permitted to materially impact on surface, underground or marine water.

Mains sewer is not available to the subject land, nor is it feasible to service the land in this way. As such, all wastewater treatment will need to be on-site and will be by way of a packaged, modular treatment plant appropriately dimensioned and sited to avoid nuisance to the normal operations of the golf course and resort, as well as minimise any potential for environmental harm.

The precise size and nature of the plant will be determined at the detailed design stage (when approximate volumes can be determined) and is also likely to involve a staging process where additional modules can added as demand increases. Storage of water for the purposes of irrigation and excess water more generally will also need to be considered, particularly for the wetter months of the year. Precise details of the systems proposed, their locations and associated storage and irrigation areas will be determined at the detailed design stage.

It is anticipated that the wastewater treatment, as well as water storage more generally, will be located on the flatter ground at the back of the dune system, between the proposed practice green and grazing land (shown below). This places the infrastructure roughly at a mid-point between the two golf courses as well as reasonable proximity to the vineyard and beef farm, where re-use water could also be used. Screening of the infrastructure will be necessary as the main access road into the resort and golf course will pass nearby. The exact area required, the engineering requirements and other details associated with the treatment, storage and disposal requirements will be the subject of expert advice and investigation at the appropriate time.

Anticipated location of wastewater and stormwater treatment and water storage area indicated by the blue star.

Such a treatment plan is likely to require an EPA licence and its specifications and on-going operation can be managed through conditions of any such licence. If a licence is required the design of the treatment plant will be undertaken in consultation with the EPA during the detailed design stage of the process.

Consideration will also be given to the treatment and re-use of wastewater throughout the site, particularly to irrigate areas of revegetation and the vineyard (if appropriate). The details of such re-use would be detailed in a Wastewater Irrigation Management Plan as would the intended methods for the management of runoff from the golf course and vineyard.

Finally, consideration will also be given to disposal of excess water from the site, as there may be times of the years or during periods of unusually high rainfall when all the available water simply cannot be stored, treated or used in a reasonable timeframe. This will require disposal to the environment and advice will need to be taken at the appropriate time as to the methods and treatment devices involved, as well as discharge points and the potential for impacts on the marine environment, groundwater, soil and the nearby lakes.

<u>Power</u>

SA Power Networks (SAPN) has been provided with the indicative demands from the subject land based on the concept plan and has prepared a scope of works and likely cost.

The scope of work includes:

- Maximum capacity 277 kVA
- Maximum capacity of 400V, 400A three phase service

- 14.5 kilometres of new overhead and underground line to extend an existing 33kV service from Lous Lane, Bray
- Conversion of some sections of SWER line to 33kV sections
- Installation of a 1000kVA at the resort site

The works would require easements over both the subject land and other land. It is likely the power route would be overhead across the grazing land and underground in the dune section, potentially at the location of the wastewater treatment plant.

The indicative cost from SAPN is $2,300,000 inclusive of GST.

A copy of SAPN's advice is contained in *Appendix P*.

As such, power demand for the proposed development can be met through the augmentation of existing infrastructure. Further, given at least part of the existing line will need to be upgraded there is the potential for existing or new users along the route to benefit.

Access

A traffic and parking assessment has been prepared for the subject land based on the master plan for the site. There is no existing traffic data available for Nora Creina Road, which has a 100 km/hr speed limit and is unsealed for most of its length. The traffic report has assumed Nora Creina Road experiences low levels of traffic as it is primarily catering for local traffic movements and no crashes have been recorded along this section of Nora Creina Road.

Having considered the land uses and accommodation types associated with the proposed development, the traffic and parking assessment concludes that the site will not function like a 'normal' golf course as it will attract people for multiple-night stays in the on-site accommodation.

Traffic

To that end, the traffic generation for the site has been calculated as follows:

Table 1 Traffic generation for two 18 hole Golf Courses (ITE land use type – Golf Course)

Time	Trips /Hole	Total Trips (2 X 18 hole golf courses)	50% discount – golf course resort
AM Peak Weekday	2.22	80	40
PM Peak Weekday	2.74	99	50
Peak Hour Saturday	4.59	165	83
Peak Hour Sunday	4.43	159	80

Table 2 Traffic Generation for Accommodation Units including Villas (total of 64 units) (ITE land use type – Recreational homes)

Time	Trips /unit	Total Trips	50% discount – golf course
AM Peak Weekday	0.16	10	5
PM Peak Weekday	0.26	17	9
Daily Weekday	3.16	202	101
Peak Hour Saturday	0.36	23	12
Daily Saturday	3.07	196	98

Peak Hour Sunday	0.36	23	12
Daily Sunday	2.93	188	94

As per the above analysis, it's envisaged that proposed facility would generate peak hour demands of 45-59 vehicles on weekdays and 92-95 vehicles on weekends with maximum daily trips are likely to occur on Saturday (181 vehicles per day). The peak hour traffic is expected to be just over a vehicle per minute. Nora Creina Road has the capacity to accommodate the additional traffic generated by the development.

The delivery and waste collection vehicles associated with the golf resort facilities, are likely to be done with typical delivery/waste trucks and would occur outside the busy periods of the day (e.g. early mornings) on permitted times as per development approval and EPA guidelines.

A new entry point will be created off Nora Creina Road and this will provide main access for vehicular traffic from the proposed development. The design of new connection and its intersection with Nora Creina Road will be undertaken as per the requirements of the relevant Australian Standards and Austroads Guidelines including the requirements of road widths, lighting, and signage and road surface treatments.

The report recommends a Construction Management Plan (CMP) be prepared including the details on traffic management, parking management, vehicle access for deliveries and emergency access during the construction phase. This would ensure there are appropriate traffic and parking arrangement in place. The CMP should be prepared before the construction commencement, in conjunction with the local/state authorities.

Parking

The proposed golf course resort facility will have 112 parking spaces. The Development Plan for the District Council of Robe does not provide for off-street parking requirements specific to Golf Course type of land use and suggests 'assess on need basis' for hotel accommodation land use.

Institute to Transportation Engineers (ITE)'s publication Parking Generation provides for parking rates of Golf Course (without an accommodation component):

Golf Course number of holes = 8.68 car parks / hole, which equates to requirement of 312 car parks for two 18 hole golf courses.

However, given the nature of the proposal as a golf course and accommodation the proposed car park facility of 112 car parking spaces are considered to be appropriate for the land use type and functionality of the proposed golf course resort. The proposed parking lay out is in general compliance with the relevant Australian Standards 2890.

The report concludes:

> *"As per the analysis above, it is considered that the proposed development is not expected to adversely impact on the surrounding road network."*

As such, there are no changes or upgrades required to other junctions or roads outside the subject land apart from Nora Creina Road. There is also no traffic-based requirement to seal Nora Creina Road although this would be highly desirable from a tourism perspective.

Drainage and maintenance issues would be part of detailed design, as well as construction and operational management plans for the site.

A copy of the traffic and parking assessment prepared for the proposed development can be found in *Appendix Q*.

The detailed design of the golf course will also allow for emergency services vehicles to access parts of the development not normally open for vehicular traffic. There will also be provision on site for a helicopter landing area in the event of need for medical evacuation.

Land Tenure

All of the subject land is privately held in four titles and no part of the proposed development relies on the Crown land (coastal reserve). Vehicular access in particular will be prohibited from the subject land onto the coastal reserve (particularly the main beach, although access from Little Dip Conservation Park is still possible despite numerous calls for DEWNR to block access). Pedestrian access from the subject land onto and along the coastal reserve will be strictly controlled by way of clearly designated walkways, signage and fencing where appropriate.

11. CONSTRUCTION AND OPERATION

(PER Guidelines 5.8.1 - 5.8.12)

A concept plan for the development of the two 18-hole golf courses, the clubhouse, retreat, accommodation, vineyard and beef farm is shown below. It is considered that sufficient investigations have occurred (including the sourcing of high resolution topographic data to allow for the indicative placement of golf fairways, native vegetation and aboriginal heritage information) to determine that there is a high level of confidence in the constructability of the concept as it currently stands. However, no detailed design has been undertaken and changes are possible.

As a result of the preliminary investigations, the golf course has been planned with a high level of confidence to avoid area of Aboriginal heritage importance, as well as the densest parts of the

vegetation and having regard for the existing land form (i.e. dunes and valleys) and the existing lakes and their surrounds.

The clubhouse, retreat and accommodation are planned for a large, fairly flat and partly cleared area between the two golf courses with commanding views of the ocean. Existing track alignments and already cleared or degraded areas will be used wherever possible.

The vineyard and cattle farm are located on the already cleared grazing land at the rear of the property and the on-site lakes are already fenced and protected.

As such, in this conceptual stage, all possible and reasonable care has been taken to identify the constraints of the site, as well as those things which should be preserved or rehabilitated, and the concept planned around it. This has also been possible because of the significant size of the land parcels involved and the ability to preserve almost three-quarters of the dune vegetation, as well as create areas of revegetation and enhance the poorest areas where weeds and pests have become problematic. The significant size of the land (and in particular the amount of land not required for the development) will easily allow for both subtle and more material changes to the concept plan if and when they arise.

If approval for the project is forthcoming, a detailed design process will commence which will determine in great detail the following issues (and numerous others as they are identified) after seeking advice from relevant experts and consultants, as these issues cannot reasonably be expected to be solved at this stage of the process:

- appropriate levels of cut and fill across the site - this will primarily be an issue for the clubhouse and other buildings, as the golf course itself relies on the natural level of the land and it topography between ridges and dunes to create and shape the course (although some earthworks will be required);
- whether most if not all of the construction materials (particularly for the golf course) can be sourced on-site, close by or whether it will be necessary to import materials to the site (not preferred);
- how recycled materials could be used, including in road construction;
- the expected amount of excavated material, vegetation and general construction that would need to be disposed of post-construction and the method and location of disposal.

As a result of the this detailed design process, a Construction and Environmental Management Plan (CEMP) will be prepared to address (amongst many other issues):

- measures to ensure the implementation of environmentally acceptable work practices;
- methods for monitoring, reporting and auditing construction impacts and practices, along with contingencies and corrective plans should issues arise and continuous improvement processes.

It is anticipated that the proposed new access point and internal road from Nora Creina Road would be constructed first to allow for ease of transportation of construction vehicles, machinery and materials into the subject land and the development site to ensure minimal impacts on surrounding landholders.

It is also anticipated that, due to the subject site's close proximity to Robe and Beachport and the relatively modest workforce required, that there would be no requirement for on-site accommodation for workers during the construction phase. It is expected that, contractually, it would be the constructor's responsibility to make such arrangements as well to transport workers to and from the subject land.

An Environmental Management and Monitoring Plan (EMMP) will also be devised by experts as an on-going, 'living' document to ensure environmental management on the site remains a priority and that rehabilitation and revegetation plans are properly implemented. This will also be important during the 'grow in' period for the golf course.

At this time it is not possible to provide significantly more information and as such it would be appropriate that both the CEMP and the EMMP form conditions of approval for the proposed development.

In terms of the potential of staging the development and its timing, that will depend on a number of issues, many of which cannot yet be accurately determined. For example, it might be the case that a single golf course is initially constructed with the second course to follow in a few years time. This will directly affect the amount of accommodation required in the short to medium term, which has flow-on effects for infrastructure provision. Barnbougle Dunes, against which the Nora Creina project is often compared, commenced operation with a single golf course and limited accommodation but has since grown that to two courses (with a third planned) and significantly more on-site accommodation.

These include:

- timing of the approval;
- time taken for agreement to be reached with investors, which will directly impact on how much of the development is initially constructed and how much will follow;
- time taken to prepare for construction;
- timing of construction (i.e. for the golf course preferably would commence mid-year to allow for successful grass growth etc).

In total construction of an 18-hole golf course is likely to take around 9 to 12 months as well as allowing for a 'grow in' period for the grass before being open for play.

It is also not possible to state with any real certainty what the long-term management agreements for the development, including the ownership of land and infrastructure. It is anticipated the resort component will be constructed, owned and operated by a third party (with expertise in operating such ventures) and potentially the golf course by another entity. However, until the approval for the project is granted it is not possible for any commitments to be made in this respect, as that will be the trigger point for serious discussions to commence with potential investors and service providers.

Other management plans likely to be required (which might be subsets of either the CEMP or EMMP) include Irrigation Management Plan, a Wastewater Irrigation Management Plan, a Soil, Erosion and Drainage Management Plan and a Stormwater Management Plan. It is not appropriate that these plans are prepared at this time, but they should be conditioned as part of any approval.

12. HAZARD AND RISK MANAGEMENT

(PER Guidelines 5.9.1 - 5.9.8)

Hazards and risks will need to be identified and documented for both the construction and operational phases of the proposed development, along with contingencies and action plans should any of the hazards or risks arise.

Construction

The site is currently not open to the public and as such there is no risk to public safety during the construction phase, particularly as the site is fairly remote from the main road. Signage ensuring that the presence of construction activities will further minimise this risk.

Suitable bushfire protection and management provisions will also need to be put in place for this phase of the development, including holding sufficient water on site for fire-fighting purposes.

Emergency evacuation procedures will also need to be considered and documented, as well as being a key part of any induction to the construction site.

Pollution risks from accidental spills or leaks would be assessed and action plans, including signage, would be documented and put into place.

It is normal practice to have an expert consultant assess acid sulphate soil risk and if necessary undertake testing to determine the likely remediation action required should acid sulphate soils be exposed during construction. This would be documented in the Construction and Environmental Management Plan (CEMP).

Procedures to avoid the transfer of weeds, pests and pathogens onto the site way of plant, equipment and people would also be controlled and implemented as part of the weed control plan for the site. Consideration would also be given to minimising opportunities for other biological nuisances to occur on site such as encouragement of the breeding of mosquitoes through inadvertent creation of suitable conditions.

The potential for erosion and other impacts from wind and water (both marine and from rainfall) would also be considered and if necessary action plans would be documented.

All of the above would be documented as part of the CEMP and risk management strategies and documentation for the site. Preparation of such documents cannot occur at this stage of the process and as such it is proper for this to be a condition of approval.

Operation

The two main risks to the public once the golf course is operational are those of cliff edges and snakes.

In the case of cliffs, it is common in many places around the world for golf holes to be constructed very close to cliff edges. It is anticipated that each such hole would be assessed and if necessary signage and fencing could be erected to minimise the risk.

Snakes are a common problem on golf courses in Australia, particularly where there is a natural landscape such as is the case at Nora Creina. Educating golf patrons is the most effective way of bringing the potential hazard to their notice but in particularly notorious areas (if there are deemed to be any) signage would be provided. It is also common for notification of the potential for snakes in the starting area of the clubhouse and also on the scorecards and golf carts. If a first aid response is required due to snake bite an appropriate response would be provided at the club house, including trained personnel.

On-going management of bushfire risk will be a key part of management of the site and by the time of operation fire-fighting facilities, including an appropriately dimensioned and located water supply, will be available. The on-going requirements will be documented in a suitable management plan format with the ability for continuous improvement.

Emergency evacuation procedures, whether it be for a medical emergency or total evacuation of the site, will be fully documented and in place prior to normal operations commencing.

The storage, management and response to hazards of substances and other infrastructure on site which could leak or cause a pollution risk will be considered and documented as appropriate, along with appropriate signage and security arrangements.

Weed and pest management will be more difficult to manage during the normal operations of the site once they commence, but consideration will be given to measures which can be taken particularly by golfers and those walking on nature trails to minimise the spread of weeds in particular. This is likely to be communicated by staff and signage at the club house.

As the site is exposed to the Southern Ocean there will be an on-going risk from wind and water causing erosion and other damage on the site. The golf holes close to the water in particular will be most susceptible and a risk analysis and action plan will be documented prior to operation commencing to ensure that when such risks do occur it is very clear what needs to occur to protect assets and public safety.

All of the above would be documented as part of the Operational and Environmental Management Plan (OEMP) for the site as well as risk management strategies and other documentation required for the proper operation of the site. Preparation of such documents cannot occur at this stage of the process and as such it is proper for this to be a condition of approval.

13. ABORIGINAL HERITAGE AND NATIVE TITLE

(PER Guidelines 5.10.1 - 5.10.6)

Aboriginal Heritage

A cultural heritage survey was undertaken of the proposed Nora Creina Resort located on coastal land 20km to the south of Robe, in the South East of South Australia. The consultant, Annie Nicholson, liaised with the South East Aboriginal Focus Group (SEAFG) and a field team of four community representatives was endorsed by the SEAFG. The fieldwork for the study was undertaken between 15th and 17th February 2015 by the consultant in conjunction with Kingsley A'hang, Kerry Clarke Hunt, Doug Nicholls and Veronica Hay.

A portion of the development area has been the subject of an earlier investigation undertaken in relation to an Abalone farm proposal by the same proponents (Wood 2006). This study was undertaken on behalf of Aboriginal Affairs and Reconciliation (AAR) in response to a Section 12 request and resulted in the identification of five new sites (German Point Sites 1-5) and the relocation of one previously recorded site (Errington Hole Midden). Recommendations were made in relation to these sites and the findings of this earlier report are contained in the latest report.

The present study investigated the remainder of the area proposed for development and resulted in the identification of twelve new areas containing cultural material (Nora Creina Sites 1-12). It is recommended that these be determined to be sites and entered onto the AAR Register of Sites and Objects. Recommendations are made in relation to these and the previously recorded sites located within the development area.

It was recommended that Nora Creina Sites 3, 6 and 9, German Point Site 2 (6323- 7077) and the Errington Hole Midden (6323-2633) remain undisturbed by activities associated with the proposed Nora Creina Resort development. In the event that some of the sites will be disturbed, damaged or otherwise interfered with by the proposed development it is recommended that site mitigation work be undertaken at these locations prior to the commencement of any development activities which may affect the sites.

The full report can be found in *Appendix R*, which also recommends the development of Heritage Management Plan/s in consultation with the local Focus Group.

Consultation

A meeting was held between the proponents and the South East Aboriginal Focus Group (SEAFG) on 13 February 2015 to further discuss the issues.

A copy of the consultant report was provided to the Department of Aboriginal Affairs and Reconciliation and the SEAFG. No additional comments were received.

Using the information gathered by the consultant report, the current golf course layout was devised to avoid Nora Creina Sites 3, 6 and 9 and the Errington Hole Midden. German Point 2 is located on Crown Land and is not affected by the proposal.

Further, Aboriginal heritage issues and the Aboriginal ties to the subject land and the region more broadly will be incorporated into an education centre, which is proposed to be located in the club house building. Proposed walking and nature trails will also take in key Aboriginal heritage locations.

A follow-up meeting was held with SEAFG on 24 October 2015, where the latest version of the concept plan was presented and discussed. No particular issues were raised with the proposal.

Heritage Management Plan

As part of the preparation for both construction on the site, the preservation of the locations identified above, the damage or destruction (or otherwise) to the remaining locations (including any mitigation measures and applications necessary under section 23 of the *Aboriginal Heritage Act 1988*) a Heritage Management Plan will be developed. It is recognised that the Heritage Management Plan is a key aspect of the framework for engagement between the parties regarding the treatment of Aboriginal heritage on the land.

It is also anticipated that the Heritage Management Plan will assist in the identification and development of the walking trails as well as informing the development of the education and cultural centre.

Contingency plans will also form part of the Construction and Environment Management Plan (CEMP) to ensure that if any aboriginal artefacts or remains are discovered during the construction phase, an appropriate process to deal with such an event is already devised and documented.

Native Title

All of the land on which the development is proposed is private, freehold land, which would indicate Native Title has been extinguished.

The above report notes that the subject land lies within country belonging to the *Bunganditj* people. A search of the National Native Title Tribunal register reveals there are no Native Title determinations or claims over the subject land.

APPENDIX A

MAJOR PROJECT DECLARATION

GOVERNMENT GAZETTE

4 MARCH 2014

APPENDIX B

CERTIFICATES OF TITLE

Lot 14 - CT 6058/105

Lot 200 - CT 6071/913

Lot 201 - CT 6071/914

Lot 202 - CT 6071/915

APPENDIX C

GOLF COURSE MASTERPLAN

APPENDIX D

PUBLIC ENVIRONMENTAL REPORT

GUIDELINES

OCTOBER 2014

APPENDIX E

GUIDELINE REFERENCE TABLE

APPENDIX F

DEVELOPMENT PLAN EXTRACT

COASTAL CONSERVATION ZONE

APPENDIX G

EBPC ACT

RESPONSE FROM COMMONWEALTH

APPENDIX H

HISTORICAL AERIAL PHOTOS

APPENDIX I

RESTORATION PLAN FOR SCANLON'S LAKE

APPENDIX J

BARRON ENVIRONMENTAL

BASELINE FLORA SURVEY

APPENDIX K

BARRON ENVIRONMENTAL

REPORT ON LITTLE DIP SPIDER ORCHID

APPENDIX L

EAC ECOLOGICAL EVALUATION

FLORA SURVEY

OCTOBER 2014

APPENDIX M

GHD REPORT

NORA CREINA LIMITED PER INVESTIGATIONS

SEPTEMBER 2015

APPENDIX N

HUDSON HOWELLS REPORT

APPENDIX O

ARCHITECTURAL MASTERPLAN

APPENDIX P

SA POWER NETWORKS ADVICE

3 JULY 2015

APPENDIX Q

TRAFFIC REPORT

OCTOBER 2015

APPENDIX R

ABORIGINAL HERITAGE REPORT