

7 November 2025

Daniel Marotti
Planning Officer
Planning and Land Use Services
Department for Housing and Urban Development

Uploaded via the PlanSA Portal

Dear Daniel,

Land Division at 49 and 55 Arumpo Street, Renmark West.

Introduction

URPS has been engaged by the Neilly Group to provide planning advice and prepare this letter in support of land division at 49 and 55 Arumpo Street, Renmark West.

This letter has been prepared in support of the proposal to be assessed by the State Commission Assessment Panel (SCAP). This letter establishes the merits of the proposed development explained further below, such that an assessment of the development proceeds.

Together with this report I enclose:

- Plan of Division with Building Envelopes by Alexander Symonds Surveyors.
- Community Wastewater Management System Plans and Report prepared by Neilly Group Engineering.
- Preliminary Site Investigation Report prepared by EHS Support.

Subject Land and Locality

The subject land is both 49 and 55 Arumpo Street, Renmark West (CT 6160/537 & CT5329/105).

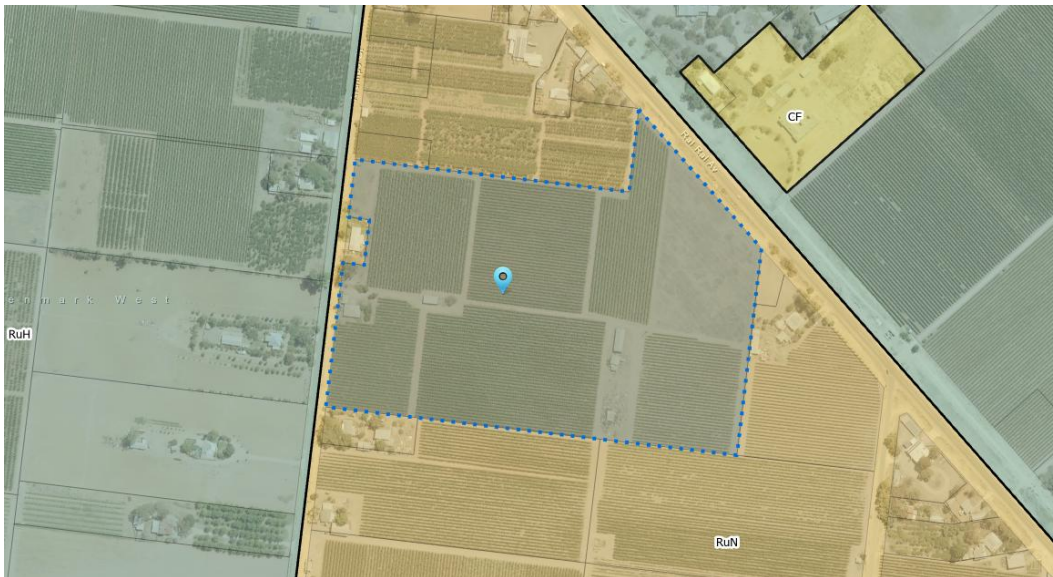
The subject land is comprised of two contiguous allotments with a site area of approximately 12.4 hectares. It has a frontage to Arumpo Street of approximately 270 metres.

The land currently contains two dwellings and multiple outbuildings associated with the horticultural use currently dominating the site.

One dwelling sits on its own allotment (49 Arumpo) and was the product of a previous dwelling excision.

The land and Zoning arrangement is shown in Figure 1 below.

Figure 1. Site and Zoning Arrangement



The surrounding locality is characterised by productive horticultural land uses and interspersed with low-density residential development.

Dwellings are typically accompanied by large outbuildings and ancillary structures.

Allotments are generally large, though there are smaller allotments interspersed with larger horticultural allotments.

The area supports a range of horticultural activities including orchards, vineyards, and small-scale commercial farming. Land use patterns are typically informal and varied, with many residents engaging in both residential and primary production pursuits on the same property.

The pattern of division suggests that dwellings are being excised from larger allotments featuring horticultural plantings, greenhouse or storerooms.

There is a clear transition from traditional allotments of primarily horticultural uses to primarily residential uses in areas closer to the Renmark West township. This is in response to the area's growing housing demand. There is evidence of dwelling excision and multi-lot land division.

Nature of Development

The proposed development comprises a 2-into-48 lot land division including new public roads and a boundary realignment between proposed lots 3 and 4.

The following lots will be created:

Lots	Site Area	Frontage
Lot 1	2205m ²	31.5m (Arumpo Street)
Lot 2	2205m ²	31.5 (Arumpo Street)
Lot 3 (existing lot, CT5329/105)	1433m ²	49.4m (Arumpo Street)
Lot 4	2932m ²	41m (New Road)
Lot 5	2367m ²	36.07m (New Road)
Lot 6	2345m ²	33.5m (New Road)
Lot 7	2345m ²	33.5m (New Road)
Lot 8	2848m ² (excised dwelling)	15m (New Road)
Lot 9	2087m ²	37.07m (New Road)
Lot 10	2100m ²	35m (New Road)
Lot 11	2100m ²	35m (New Road)
Lot 12	2100m ²	35m (New Road)
Lot 13	2100m ²	35m (New Road)
Lot 14	2088m ²	37.07m (New Road)
Lot 15	2070m ²	37.07m (New Road)



URPS

Lots	Site Area	Frontage
Lot 16	2082m ²	35m (New Road)
Lot 17	2083m ²	35m (New Road)
Lot 18	2083m ²	35m (New Road)
Lot 19	2083m ²	35m (New Road)
Lot 20	2070m ²	37.07m (New Road)
Lot 21	2083m ²	37.07m (New Road)
Lot 22	2083m ²	35m (New Road)
Lot 23	2083m ²	35m (New Road)
Lot 24	2083m ²	35m (New Road)
Lot 25	2083m ²	35m (New Road)
Lot 26	2070m ²	37.07m (New Road)
Lot 27	2150m ²	33m (New Road)
Lot 28	2139m ²	30m (New Road)
Lot 29	2139m ²	30m (New Road)
Lot 30	2139m ²	30m (New Road)
Lot 31	2139m ²	30m (New Road)
Lot 32	2139m ²	30m (New Road)
Lot 33	2139m ²	30m (New Road)
Lot 34	2145m ²	30.08m (New Road)
Lot 35	2190m ²	37.07 (New Road)
Lot 36	2103m ²	35m (New Road)

Lots	Site Area	Frontage
Lot 37	2103m ²	35m (New Road)
Lot 38	2103m ²	35m (New Road)
Lot 39	2103m ²	35m (New Road)
Lot 40	2090m ²	37.07m (New Road)
Lot 41	2578m ²	31.82m (New Road)
Lot 42	2083m ²	15m (New Road)
Lot 43	2082m ²	29.75m (New Road)
Lot 44	2070m ²	24.75m (Arumpo Street)
Lot 45	2070m ²	24.75m (Arumpo Street)
Lot 46	2083m ²	29.75m (Arumpo Street)
Lot 47	2083m ²	29.75m (Arumpo Street)
Lot 48	2123m ²	30.33m (Arumpo Street)
Reserve 1 (Arumpo Frontage)	628m ²	-
Reserve 2 (Ral Ral Avenue Boudary)	5724m ²	-

Procedural Matters

The land is in the Rural Neighbourhood Zone of the Planning and Design Code.

The land is also within the Bookmark Creek Sub-Zone.

The following Overlays apply:

- Hazards (Bushfire – Outback).
- Hazards (Flooding – Evidence Required).
- Murray-Darling Basin.

- Native Vegetation.

The Sub-Zone guides allotments of 2ha (20,000m²) unless wastewater is suitability managed, in which case a minimum site area guideline of 2,000m² applies to the land as per the Zone.

Planning and Design Code Assessment

Land Use

The Desired Outcome of the Zone seeks:

- DO1** *Housing on large allotments in a spacious rural setting, often together with large outbuildings. Easy access and parking for cars. Considerable space for trees and other vegetation around buildings, as well as on-site wastewater treatment where necessary. Limited goods, services and facilities that enhance rather than compromise rural residential amenity.*

Zone PO 1.1 states:

- PO 1.1** *Predominantly residential development with complementary ancillary non-residential uses compatible with a spacious and peaceful lifestyle for individual households.*

The Zone specifically envisages housing on large allotments in a spacious rural setting. The proposed allotments are intended for residential development and therefore the intended land use is appropriate to the Zone.

Site Area and Frontage

The minimum site area for allotments within the Zone is provided by DPF 8.1 as follows:

- DPF 8.1** *Development will not result in more than 1 dwelling on an existing allotment or Allotments/sites for residential purposes accord with the following:*
- (a) *Where allotments/sites are connected to mains sewer or a Community Wastewater Management System site areas (or allotment areas in the case of land division) are not less than:*
- Minimum site area is 2,000 sqm ‘,,,’*
- (c) *Site frontages are not less than 20m.*

The minimum site area provided is 2,000m² when connected to a community wastewater management system.

PO 8.1 guides that proposed allotment sizes are consistent with dimensions expressed in the TNV within DPF 8.1 or are of suitable size and dimension to contribute to a pattern of development consistent to the locality and suitable for their intended use.

The proposed allotment site areas all exceed 2,000m² and satisfy the Zone.

While no frontage guideline applies, the minimum proposed is 30.76m. This is suitable for the intended residential purpose of each allotment and sufficiently consistent with the locality as per PO 8.1.

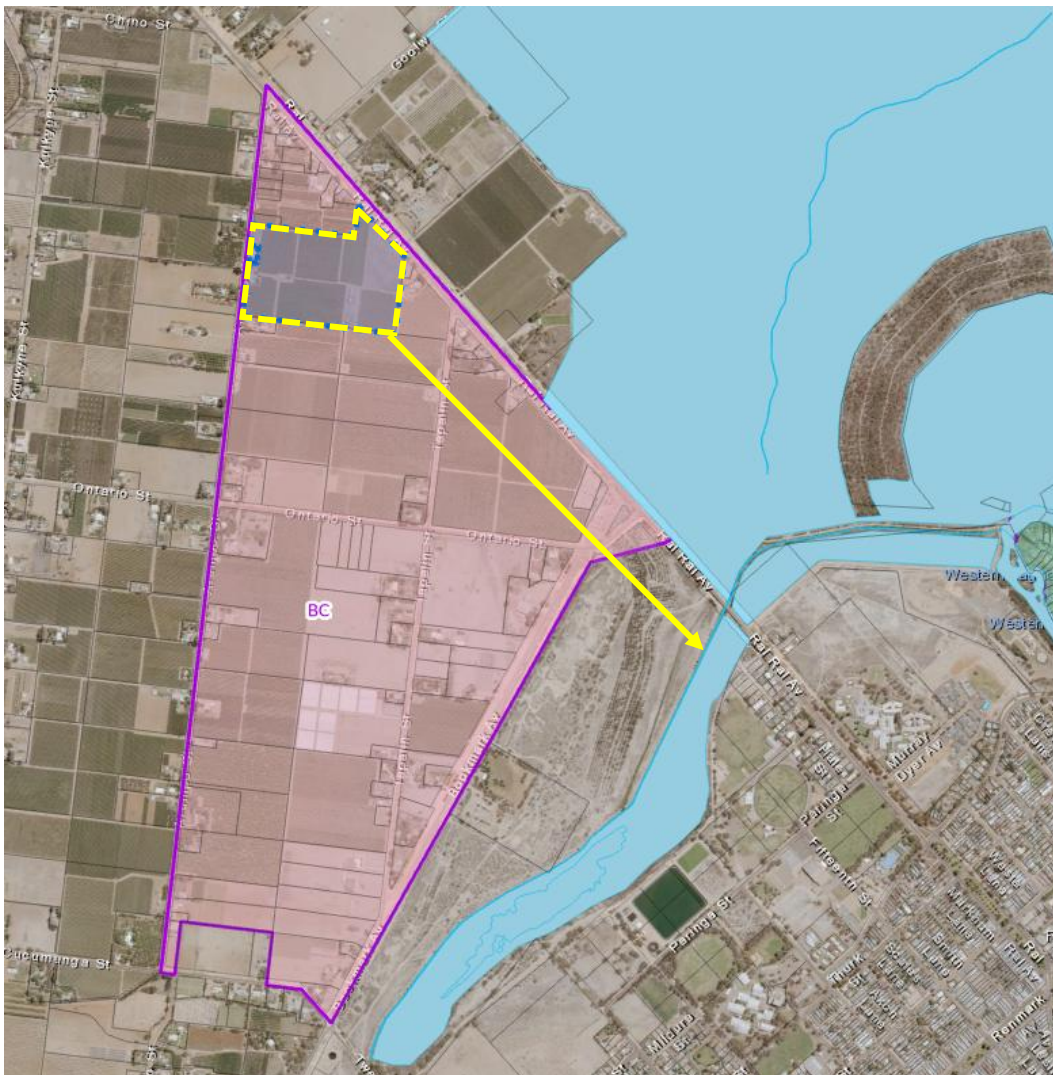
Water Quality and Wastewater Management

The Desired Outcome of the Bookmark Creek Subzone seeks:

DO1 *Development does not compromise the quality of groundwater on site or water in Bookmark Creek and the River Murray.*

The site is setback from Bookmark Creek by approximately 700 metres as seen in Figure 2 below:

Figure 2. Land's location with respect to Bookmark Creek.



DPF 1.1 of the Subzone seeks:

- DPF 1.1** *Allotments/sites less than 2 hectares in area accord with the following:*
- a) are connected to a community wastewater management scheme, or*
 - b) are the subject to a legally binding agreement that requires subsequent development that generates wastewater to be connected to an on-site wastewater system that contains the wastewater and prevents it entering into surface water or groundwater*

All proposed allotments are less than 2ha's.

It is intended that the allotments are connected to a Community Wastewater Management System (CWMS) as per DPF 1.1(a).

Neilly Group Engineering, has designed an indicative CWMS system to ensure compliance with:

- National Guidelines for Water Recycling: Managing Health and Environmental Risks, November 2006.
- SA Public Health (Wastewater) Regulations, 2013.
- Community Wastewater Management Systems Code, April 2013.
- On-site Wastewater Management Systems Code, April 2013.
- South Australian Public Health Act 2011 (Factsheet).

This CWMS arrangement is attached and shown in Figure 3 below.

Figure 3. Community Wastewater Management System layout.



The proposed development satisfies the Sub-Zone and the proposed allotment sizes are appropriate, albeit below 2ha's. This is because the proposed CWMS will not compromise the quality of groundwater on site or water in Bookmark Creek and the River Murray as per DO 1.

Site Contamination

EHS Environment Consultants were engaged to prepare the attached Preliminary Site Investigation Report. Their report concludes:

- No potentially contaminating activity has been identified to have occurred on the site between 1910-1991.
- No records of site contamination, protection orders or authorisations on the site.
- Most of the asbestos identified on site was identified to be in existing buildings. This will be removed in accordance with best practice asbestos removal methods.
- Asbestos fragments in soil will be managed via the Asbestos Management Plan detailed in Appendix G of the PSI.

The recommendations for remediations are to be adopted. The land can safely accommodate the proposed land division for residential use.

Stormwater Management

PO 1.1 of the Hazards (Flooding – Evidence Required) Overlay seeks:

PO 1.1 Development is sited, designed and constructed to minimise the risk of entry of potential floodwaters where the entry of flood waters is likely to result in undue damage to or compromise ongoing activities within buildings.

The proposed land division will not increase the risk of floodwaters upon the land.

Each individual dwelling would have an individual stormwater management system which will minimise damage from the entrance of flood waters.

All stormwater infrastructure, including the new public road will be designed and constructed in accordance with Council's standard requirements to ensure compliance with the Hazards (Flooding – Evidence Required) Overlay.

Native Vegetation

Vegetation proposed to be removed has been planted as part of horticultural uses and is not native.

No native vegetation is proposed for removal and the provisions of the Overlay are satisfied.

Traffic Movements

The General Development Policies – Land Division guide that land division must:

PO 3.1 Land division provides allotments with access to an all-weather public road

PO 3.4 Road reserves provide for safe and convenient movement and parking of projected volumes of vehicles and allow for the efficient movement of service and emergency vehicles.

Increased traffic movements can be readily accommodated by Arumpo Street.

The proposed lots are to be serviced by a 15-metre-wide internal road constructed from an all-weather surface.

The proposed road will allow the movement of traffic in both directions as well as providing suitable space for on-street parking to avoid congestion along Arumpo Street.

Construction specifications of the proposed roads can be found in Appendix C of the CWMS report prepared by Neilly Group Engineering.

Infrastructure

General Development Policies – Land Division guides that:

DPF 4.3 Development is not built on, or encroaches within, an area that is or will be, required for a sewerage system or waste control system.

As illustrated by the attached plan of division, the allotment configuration accommodates an area reserved for the community wastewater systems infrastructure and will not be encroached upon by any future dwelling or structure.

Effects on Subject Land, Locality and the Environment

Land & Locality

The current use of the land is low-scale residential with a small-scale hobby farm occurring alongside it. In my view, the size of the subject land may constrain viable horticultural uses. It is a candidate for further residential use as sought by the Zones.

The proposed land division and subsequent residential uses are envisaged by the Zone and Sub-Zone.

It would not unreasonably impact the land and its surrounds as it would effectively manage stormwater and wastewater via a CWMS.

Environment

The proposal would not unreasonably impact the natural environment because:

- A Community Wastewater Management System has been designed to prevent water quality impact upon groundwater, Bookmark Creek or the River Murray.
- Minimum allotment sizes satisfy the Zone ensuring low-density development and good levels of vegetation and stormwater infiltration.
- No native vegetation is being removed.
- The site is unlikely to be a critical wildlife corridor for any endangered species noting it features limited vegetation and comprises farming activities.

Social, Economic and Environmental Impacts

The proposed development would have the following SEE impacts:

Social Impacts

- Increased housing supply to support local population growth and housing demand.
- Increase variety of housing supply within the region.
- High quality amenity for future residents, noting the surrounding rural character and proximity to community services in Renmark.

Economic Impacts

- Development activity will contribute to the local economy through construction , employment and the use of other shops and services in the region.
- Additional housing will increase the Council's rate base.
- Residential housing supply may attract new residents to the region who intern would bolster the local economy.
- Increased housing supply may contribute to housing affordability in the local area.

Environmental Impacts

- The proposal is for residential development in accordance with the Zone. This involves the construction of a road and more roofed surface across the land. These will have an environmental impact, however, stormwater and wastewater will be adequately managed in accordance with the Planning and Design Code and Council's requirements.

Conclusion

In conclusion, the proposed land division is consistent with the Planning and Design Code. The proposal has merit to proceed to further assessment because:

- The Zone and Sub-Zone anticipate residential allotments, as is proposed.
- All allotments will be connected to CWMS such that the quality of groundwater, Bookmark Creek and the River Murray are not compromised.
- All allotments exceed 2,000m² in accordance with the Zone.
- All allotments have a frontage, depth and shape that is suitable for their intended residential purpose.
- The land is not contaminated to a degree which cannot be remediated for residential purposes.
- All stormwater infrastructure and the new public road will be designed and constructed in accordance with Council's standard requirements.
- The proposal will have positive social and economic effects upon the locality.
- The proposal will not have unreasonable environmental impacts.

The proposal is aligned with the Planning and Design Code and carries suitable merit to be proceed to assessment by SCAP.

Please contact me on 08 8333 7999 or at mgrogan@urps.com.au if you require additional information.

Yours sincerely



Michael Grogan
Consultant