



# Friends of Willunga Basin inc.

15 High St, Willunga, 5172

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Mayor Were  
City of Onkaparinga  
PO Box 1,  
Noarlunga Centre  
SA 5168  
***Via email***

19 January 2024

Dear Mayor,

## **Development Application ID 23031140 Lot 3 Tuit Road, Aldinga**

FOWB understands that Council has received the foregoing development application for the construction of a recreation facility (a wave pool) and tourist accommodation, together with associated shop, office, wellness studio and food & beverage facilities.

The subject site is located within the Tourism Development Zone, which encourages tourism related uses. Against this, the land uses proposed in the application generally appear consistent with the zone objectives. Accordingly, as per the designated assessment pathway under the Design Code, there will be neither any public notification of the application, nor any rights of appeal for anyone should approval be granted.



FOWB accepts that this is the planning and zoning framework for decision making around the application – and, in the circumstances, voices no objection to most of what is proposed. The zoning is the zoning is the zoning.

However, one aspect of the proposal, being the wave making machine and associated wave pool, has raised significant comment and concern within the local community and our membership. The designated assessment pathway notwithstanding, we are accordingly compelled to put forward certain points for consideration within Council before the application is sent on to the Assessment Panel (CAP) for decision. The following commentary is primarily centred on the wave making aspect of the proposal.

In FOWB's view, Council's planning report to the CAP should recommend refusal. At specific issue is how the wave pool facility sits within the local landscape when considered against the provisions of the Character Preservation (McLaren Vale) Act 2012 (the Act).

As shown, in the preceding photograph, the wave machine and pool constitute a substantial piece of infrastructure – concrete and steel deployed at large scale. The facility is apparently to the order of three Olympic swimming pools long and the length of one Olympic pool wide, with a 120-metre-long building along one edge housing machinery to blast high pressure air jets into the pool at regular intervals to create waves. There is nothing agricultural about it.

It is this scale and the underlying character of the facility that gives principal cause for concern.

Specifically, FOWB contends that the proposal is at odds with the Act. Per Sec 6, the objects of the Act are:

*(a) to recognise, protect and enhance the special character of the district while at the same time providing for the economic, social and physical well-being of the community; and*

*(b) to ensure that activities that are unacceptable in view of their adverse effects on the special character of the district are prevented from proceeding; and*

*(c) to ensure that future development does not detract from the special character of the district;*

*(d) otherwise to ensure the preservation of the special character of the district.*

At Sec 6 (2) the Act provides that *a person or body involved in the administration of an Act must, in exercising powers and functions in relation to the district, have regard to and seek to further the objects of [the] Act.*

In other words, it is mandatory that the assessment process is not only directly cognisant of the preceding objectives but that it should “seek to further” them.

In the context of better defining the objectives, Sec 7 then provides that *the following character values of the district [be] recognised:*

*(a) the rural and natural landscape and visual amenity of the district – with which the proposal is at odds;*

*(b) the heritage attributes of the district – with which the proposal has no apparent connection (and would arguably be at odds if the rural character of the immediate locality was to be considered to represent any kind of “heritage attribute”);*

*(c) the built form of the townships as they relate to the district – not relevant in the present context;*

*(d) the viticultural, agricultural and associated industries of the district* – with which the proposal has no apparent connection;

*(e) the scenic and tourism attributes of the district* – in which regard the proposal can scarcely be considered as contributing to any scenic attributes, leaving only the tourism attributes, which are arguable, as below.

Sec 7.2 further provides that *the character values of the district are relevant to ... (b) the policies to be ... applied by any state planning policy and the Planning and Design Code under the Planning, Development and Infrastructure Act 2016 in relation to the district.*

Again, it is mandatory that the assessment process specifically address these character values, noting also that these are the *only* values that the assessment process can recognise.

Further, under the Design Code, the Character Values Overlay takes precedence over the underlying Tourism Development zoning in the assessment process.<sup>1</sup>

From this mandatory starting point and as per the comments inserted above, it can be seen that the proposal is either at odds, has no connection or is not relevant with/to all but the last of the defined “character values” of the district. This is because it is so out of character with its locality, being urban and industrial in its form and typology, as against the rolling fields (and an equestrian centre) that primarily surround it.

The problem is exacerbated by the siting of the wave making building so close to Bowering Hill Road, including the highly industrial nature of the largely exposed-to-view main building access roller doors and staff carpark. There is no getting away from the fact that the proposal calls for a 120-metre-long building set on a relatively quiet rural road and largely surrounded by land given over to cereal cropping<sup>2</sup>.

In respect of item (e) in the list of character values, it is only any “tourism attributes” generated by the proposal that might possibly provide an avenue for allowing it to gain approval. In this regard, the wave making facility will clearly provide a tourism destination that will be different to the region’s current offering.

The question sitting behind this however is exactly what these tourism attributes might be. FOWB suggests that because the wave making component of this proposal is so different in its character to that of the general locality, the tourism attributes can only really be related to the levels of visitation generated and the economic contribution that the facility might make to a region to which it has no other obvious connection or reason to be.

These economic returns are a complete unknown and to the extent that they have been considered in any detail, can presently constitute little more than high level financial modelling based on many assumptions, as opposed to firm forecasts. Whether they will ever be delivered is anyone’s guess.

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<sup>1</sup> “*Overlay policies take precedence over other Code policies.*” See page 5, Guide to the Planning and Design Code, June 2022, this being the official guide from PlanSA to the interpretation of the Code.

<sup>2</sup> *Indeed, it might be considered that the proposal would be much improved if the wave pool and building were sited along the eastern boundary, close to one section of the adjoining caravan park but generally out of public view.*

In a Greater Adelaide context, the site is remote (and exposed), while the product is expensive – apparently +/- \$100 for a surfing session (which presents its own challenges in the middle of a ‘cost of living crisis’). Aldinga has neither the population nor the climate of SE Queensland or northern New South Wales, where such schemes are more often proposed. There are less than 200,000 people living south of O’Halloran Hill – an area which includes a number of socio-economically challenged suburbs – so the rest of the customers will have to come from further away. How many will make the trek (and return time and time again to provide ongoing revenue) remains to be seen, especially in mid-winter. Better perhaps that it be located closer to its market.

Wave pools are an emerging technology and are expensive to build and to operate. The challenges of developing such facilities are outlined in the ABC article to found at:

[https://www.abc.net.au/news/2023-12-02/cost-and-complexity-of-building-surf-wave-pools-in-australia/103032852?utm\\_campaign=abc\\_news\\_web&utm\\_content=mail&utm\\_medium=content\\_shared&utm\\_source=abc\\_news\\_web](https://www.abc.net.au/news/2023-12-02/cost-and-complexity-of-building-surf-wave-pools-in-australia/103032852?utm_campaign=abc_news_web&utm_content=mail&utm_medium=content_shared&utm_source=abc_news_web)

While economics does not figure in the planning equation, this article makes clear that Council has been presented with a highly speculative proposal. There are very few such facilities operating anywhere in the world and only one public facility in Australia, while the technology we understand is proposed here apparently remains largely unproven at scale. Against this, Council is being asked to green-light the scheme, presumably to allow the proponents to better pitch for the \$30 mill plus in funding apparently required to deliver it.

The writer’s long professional experience as a land economist has taught that, over and above generic property sector and development risks, specialized facilities such as this come with their own heightened risk profile. In this case, a key risk is that the projections in the business model are not delivered – annual visitor numbers and/or revenue fall short over time, operating costs are higher than expected, or both – which is an entirely plausible outcome in all the circumstances and more so over time as the initial wave of enthusiasm subsides.

If the facility was to be built and to subsequently fold, then the district would find itself saddled with a white elephant, the remains of which will not be adaptable to any other use and would be hard to clear away. In this regard, this scheme is suggested to be as risky as any commercial development proposal the writer has seen in Adelaide for many a year – perhaps since the roller coaster in the Myer Centre (all based on a Brisbane model), which ended in such tears.

Against all of this, it is essential that the proposal clearly enunciate the tourism attributes that it will deliver to the region, without which it cannot pass the character values test. Even then, the articulation of these attributes will have to be sufficiently compelling to single-handedly outweigh the multiple other values listed in Sec 7.

At the end of the day, the CAP will have to make an ‘on balance’ decision. FOWB contends that, on balance, the proposal does not pass the character values test set down by the Act, that this ‘failure to pass go’ takes precedence over the underlying zoning and that consent should therefore be refused – and that Council’s planning report to CAP on the matter should make this position clear.

Beyond this, FOWB is also aware of email correspondence which has been exchanged between Council and neighbours to the scheme, Andy & Maureen Tyler, and of the many issues raised in said correspondence. For the most part, we can only assume that Council's planning officers will be diligent in their review of these issues. For FOWB, stand out issues are:

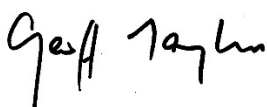
- noise, which we understand has been modelled and reviewed, but in which regard we observe that the wave making machine, and the waves it makes, cannot but help to increase underlying noise levels in the immediate and, until now, very quiet rural locality, particularly at either end of the day;
- the notion of injecting 'used' pool water into local aquifers needs expert review to ensure that it is an environmentally sound approach to the operational problem of having to drain the pool periodically; and
- the hours of operation – including daylight hours for the wave pool, so potentially 6.00 am to 9.00 pm daily for most of summer; and 7.00 am to 11.00 pm daily for the tap house – both of which are quite extended hours of operation that will further contribute to a change of character in the immediate locality and both of which should arguably be curtailed somewhat.

To conclude, FOWB considers the proposal to be at odds with the desired character of the district, as enunciated in the Character Preservation Act and contends that the application should be refused consent on these grounds. If it is to be approved, then this should only be after Council has undertaken the most stringent assessment and, in FOWB's view, after there have been significant changes to current plans to ameliorate the present shortcomings.

Although community is not allowed to make submissions to CAP or representations to the CAP meetings, we do wonder whether it would be possible or appropriate to make a deputation to Council on this matter and will appreciate your advice on this. Failing that, we plan to attend the relevant CAP meeting to listen to the discussion and to see if our concerns have been addressed.

Thank for your consideration of this matter.

Yours faithfully,



**Geoff Hayter**  
**Chair**

cc  
Councillors Jew, Yeomans, Bell & Pritchard  
Phu Nguyen – City of Onkaparinga  
Renee Mitchell – City of Onkaparinga  
Leon Bignell MP