

31 January 2025

South Australian Local Government Boundaries Commission
GPO Box 2329
Adelaide SA 5001
boundaries.commission@sa.gov.au

Attention: Alex Hart Director, Office of Local Government, Department of Housing and Urban Development

Dear Alex

Submission – Council Boundary Change Proposal (Seacliff Park)

I act on behalf of Raymond Tonellato of Seacliff Ocean View Estate Pty Ltd (the parent company of Seacliff Developments Pty Ltd) (the **Landowner**). The Landowner is the registered proprietor of Allotment 11 and 12, in Deposited Plan 17780 located within the Hundred of Noarlunga as recorded in Certificate of Title Volume 6294 Folio 783, also known as 17 -27 Scholefield Road, Seacliff (**the Land**). Refer **attachment 1 – certificate of title**.

Please accept this submission (detailed below) for the purposes of a s30 *Local Government Act 1999* (the Act) administrative (boundary change) proposal in respect of the Land.

Eligible Elector (Public) initiated boundary change

In accordance with Commission's Council Boundary Change Proposals Guideline No 2 (the Guideline), the prescribed percentage of eligible electors may submit an administrative (boundary change) proposal to the Commission for consideration.

The following is an extract of a letter forwarded to the Commission dated 27 November 2023 from Mr Phil Brunning in respect to this aspect of the matter:

I advise that Raymond Tonellato of Seacliff Ocean View Estate Pty Ltd (the parent company of Seacliff Developments Pty Ltd) has been entered onto the voter's role by the City of Holdfast Bay given his interest in 17-27 Scholefield Road, Seacliff.

Accordingly, I am of the view that prescribed percentage (10%) of eligible electors for the relevant area that is the subject of the boundary change proposal as required by Section 28(1) (d) of the Local Government Act 1999 has now been satisfied.

Please refer to the letter received from Mr Roberto Bria, Chief Executive Officer at the City of Holdfast Bay confirming this enrolment but stopping short of confirming that the prescribed percentage eligible electors has been met.

Importantly, all parties have acknowledged that the area of land which is the subject to the boundary change is limited to one site only, that is only one site owner and there are no other existing community members who would be deemed to constitute eligible electors for the purpose of the satisfying this legislative requirement.

More particularly the parties have agreed, given the circumstances, with only one community member affected by the 'small' boundary change that the 10% eligible elector representation factor has been satisfied. Accordingly, the Landowner meets the criteria for the purposes submitting an administrative proposal under the Act (and Guideline).

Outline of the Submission

As stated above, the Land, the subject of the submission is located at 17 Scholefield Road, Seacliff. The Land has one landowner, and no other sites (and/or landowners) are affected by the proposed council boundary change.

The Land has recently received the benefit of a Provisional Development Plan Consent for a shopping centre development.

The Cities of Holdfast Bay and Marion council boundaries runs through the middle of the Land, and just South of Scholefield Road, Seacliff.

The proposed shopping centre development forms part of an integrated development with an adjoining property (located principally in the City of Marion) that is to accommodate a residential development located to the South and East of the site. A small portion of the proposed residential development is located within the Holdfast Bay Council area.

Public infrastructure in the form of roads, footpaths, stormwater and open space are to be provided as part of both the shopping centre and residential developments that will benefit the community.

The council boundary is proposed to be changed to avoid significant frustration with respect to a wide range of community of interest matters including council jurisdiction matters pertaining to the development construction, infrastructure delivery and maintenance, matters of communities of interest, electoral voting and property rating.

The Landowner seeks to have the council boundary changed, so that the entire site (ie Land) is located within the City of Marion area.

The boundary change proposed seeks to have the council boundary moved north and located at the centre line of Scholefield Road.

The proposed boundary realignment would result in several benefits relating to both the broader existing community, the proposed new residential community to be established by way of the development, the owners, developers and operations of both the shopping centre development (which forms are primary point of reference in respect to this proposed boundary change) and the adjacent residential development.

The focus in considering the consequences and argument for pursuing the proposed boundary change are directed at the community of interest variables and detailed below in this submission.

This boundary change is presented and asked to be considered as a minor administrative boundary change. More particularly “to facilitate a development that has been granted an authorisation under the Planning, Development and Infrastructure Act 2016”.

A map detailing the existing council boundary alignment and the proposed new boundary is provided at **attachment 2 – Council boundary alignment**.

Background

A Council initiated boundary change proposal commenced in August 2021. At the time, Mr Phil Brunning, from Phil Brunning and Associates, had been engaged and was assisting with this process. The proposal had ‘in principle’ support of the two councils involved.

Due to delays associated with the council-initiated boundary change process and on advice to the Landowner (via their agent dealing with the matter, Design IQ), the Landowner determined to change the process to an eligible elector (public) initiated boundary proposal (per the Act). This change occurred in February 2023.

Communication to this effect was exchanged between Mr Brunning and the City of Marion and Holdfast Bay Council, and then subsequently between Mr Brunning and the South Australian Local Government Boundaries Commission.

The Boundary Commission, via correspondence dated 11 April 2023, acknowledged the intent to vary the boundary change proposal from a Council initiated boundary change to an eligible elector (public) process.

On 26 September 2023, the Boundary Commission confirmed, via correspondence, that the council-initiated proposal was no longer be proceeding.

Following a review of the boundary change proposal earlier this year, it was determined that the proposed boundary change is and should be considered as minor. The fact that there is only one ‘eligible elector’ involved and the subject site to which the council boundary is proposed is vacant, the consequences of the boundary change could otherwise be considered minimal.

Consequently, the Commission is asked to consider whether the proposed boundary change warrants any public consultation to be undertaken (as required by an eligible elector proposal), and instead could and should be considered by the Commission as an administrative proposal to affect the requested boundary change.

Administrative Proposal

The legislative provisions relating to Administrative Proposals are detailed in the Act as follows:

Section 30 (7) In this section— administrative proposal means a proposal—

(a) relating to the alteration of a boundary that is shared by 2 or more councils—

(i) to facilitate a development that has been granted a development authorisation (within the meaning of the Planning, Development and Infrastructure Act 2016); ...

Grounds for making the submission

As stated above, the Land to which the council boundary change relates is subject to several recent development applications and associated planning consents as referred below:

Development application – shopping centre

The most significant form of proposed development, which is to occur on the site, is a retail/commercial development otherwise referenced as the Seacliff Village Retail Centre.

As the Land is situated across two council areas, the Planning Commission was determined to be the relevant planning authority.

The Land had also been the subject of a rezoning process (including the requisite public consultation) to Suburban Neighbourhood Zone as part of a the 'Seacliff Park Residential Centre Development Plan Amendment' and was authorised in November 2020. However, since the inception of the Planning and Design Code on 19 March 2021 the land zoning category has changed to Master Planned Neighbourhood Zone. (Part of the Land that is to accommodate the proposed residential development had a history of past use as landfill).

As part of the rezoning process, infrastructure deeds have been negotiated and agreed between the Landowner, developer and the respective two councils. These agreements apply to the broader development proposal that is to proceed over the coming 12-18 months.

The shopping centre development comprises some 3352 sqm of supermarket retail space, 10 retail tenancies having a combined floor space of approximately 1750sqm, food and beverage (licensed) premises totalling approximate 1280 sqm.

The development application has not involved any public notification (per the provisions of the Planning and Design Code). It is noted however, that the sites rezoning, as mentioned above, did involve extensive public consultation.

The shopping centre development application Planning Consent notice (24007160) is provided at **attachment 3**.

Development application – residential land division

A development application (land division) has been approved for residential development purposes that incorporates a small portion of the Land (southeastern corner) which intersects with both council boundaries.

The residential development is currently underway, as a partnership with the Landowner and Villawood. No dwellings have yet to be constructed.

The residential land division development approval notice (Development application no: 22006232) is provided at **attachment 4**.

Development - Council boundaries

It is fair to say that the Landowner and his/her agents are experiencing some difficulties in dealing with two separate council administrations for the purposes the delivery both aspects of the shopping centre and residential projects, particularly in relation to the engineering standards and public realm treatments.

Furthermore, it is submitted that once completed the integrated shopping and residential developments will be more effectively and efficiently established and operated in a coordinated manner under the administrative responsibility of one council not two.

It is in respect to the issuing of consent for the shopping centre development application that the request to change and the submission for an 'Administrative (boundary change) Proposal are presented.

The shopping centre development constitutes a significant multimillion dollar investment which, if to be delivered in an orderly and cost- effective manner, would be if the Landowners, developers, future occupiers of the shopping centre and associated communities, were governed by one Council, the City of Marion.

The need for government to actively participate and facilitate positive investment and job creating opportunities have been well documented, and every opportunity should be taken to ensure that private sector investments are facilitated and encouraged by all levels of government.

The consolidation of a change to the site's council boundaries will allow for greater efficiencies in the planning and delivery of the project in the coming 12-18-month period relative to the developments' construction and future operations of the shopping centre.

Significantly, community of interest principles, including community participation and the enjoyment of the centre will, over time, be more efficient and effective if the centre operates in one local government area.

Additionally, the scale of the centre will have many interface aspects with local government which will benefit from one local government body being the conduit to local community interests and representation.

For example, aligning the retail and service activities planned for the shopping centre—both during the initial development phase and as tenancies evolve over time—will better meet the needs and outcomes of the community of interest. This alignment can be more effectively and efficiently achieved if a single local government representative body engages with the shopping centre's owners and operators, ensuring consistent representation of the community's interests over the medium to long term.

Section 26 Principles – responses

As stated above, the proposed boundary change seeks to incorporate the entire development site (Land) at 17 Scholefield Road, Seacliff, into the City of Marion area. This will enable more cohesive governance, planning, and service delivery, particularly as the site transitions from vacant land to a significant mixed-use development comprising a shopping centre and adjoining residential components.

The principles outlined in Section 26 of the Act are addressed below to demonstrate how the proposed change aligns with these guidelines and will benefit the affected councils, residents, and broader community.

(i) the resources available to local communities should be used as economically as possible while recognising the desirability of avoiding significant divisions within a community.

Council resources are finite and very decision made that achieve greater efficiency and effectiveness outcomes need to be made accordingly.

The Landowner (and the future developers) of the site, both of whom form part of the community, will achieve greater efficiency in the development, construction and future operating of the shopping centre project if it were located within the one council area.

Having the shopping centre site split into two council areas has and will continue to generate duplication in resource use when dealing with two council administrations.

Once construction of the shopping centre is completed and then the shopping centre becomes operational, duplication in dealing with two councils relative to the variety of interface issues between the commercial operations of the centre, the Council's and community will be improved if such relationships are formally structured with one council.

The shopping centre's 'field of influence' will have will be broad. Retail and community-based uses within the centre will be of importance to many in the community and the shopping centre management will be seeking to ensure resources allocations and service offerings are to be benefit of community both locally and regionally.

As the site is currently vacant (but soon to be developed), the opportunity to create a new community identity and sense of belonging is now. Consolidation of the council boundary before the site is developed and occupied will assist in avoiding any division that may otherwise result.

In summary:

- Splitting the site between two councils results in resource duplication during development, construction, and ongoing management.
- Developers and stakeholders will benefit from streamlined interactions with a single council administration, avoiding inefficiencies in dealing with two separate regulatory bodies.
- Consolidation ensures that future operations—such as permits, compliance, and maintenance—will have a single point of contact, reducing administrative complexity and costs for all parties involved.
- From a community identity perspective, aligning the site with the City of Marion avoids artificial divisions between the commercial and residential components of the development, fostering unity and stronger community ties.

(ii) proposed changes should, wherever practicable, benefit ratepayers.

This submission has been focused on what is best for community, located in both the City of Marion and City of Holdfast Bay.

Cost of living - The proposed boundary change will assist community within both council areas by streamlining local council interface to one council and not two, thereby avoiding duplication in resource allocation and expense of services to the community.

Reduced local government resources will be required to manage matters that will arise as only one administration will be primarily responsible. The cumulative consequence of which will

reduce council costs and assist to reduce pressure on council's annual rate setting considerations that influence community cost of living.

Improved community service outcomes – by dealing with one council administration the shopping centre operations will be able to ensure the mixture of retail uses and ancillary services to be provided to be better informed and aligned with community expectations and needs.

Project delivery outcomes – existing community in the immediate area will benefit from knowing that both the shopping centre and residential developments will be progressed having direct dealings with one council and not two. This will streamline the ability of the developers to deal directly and consistently with one council administration.

As previously publicly reported by the City of Marion in its original General Proposal, the following is agreed and presented in respect to the alignment of the boundary change to this Principle:

As the subject land is currently vacant, future ratepayers will benefit from:

- *An ease of liaising with one council around all their service needs*
- *The removal of any public perceived 'bureaucracy' of two council boundaries.*
- *The removal of perceived (or real) service and rates disparity to residents/tenants*

Furthermore, as a new development, a boundary realignment will consolidate the community and promote the opportunity to collectively engage with the City of Marion on matters relating to their new community.

In summary:

- Ratepayers will benefit from:
 - Lower administrative costs due to reduced duplication.
 - Clearer lines of communication for service delivery.
 - Elimination of perceived disparities in services and rates for residents within the same development.
- Future residents and tenants will enjoy greater simplicity in engaging with local government, avoiding the perceived bureaucracy of interacting with two councils
- A single-council jurisdiction will reduce operational costs for the developer, the shopping centre, and residents, with potential savings passed on to ratepayers in both council areas

(iii) a council should have a sufficient resource base to fulfil its functions fairly, effectively and efficiently.

The proposed boundary change, given its limited area, will not have any material consequence to either the City of Marion or the City of Holdfast Bay relative to resources to continue to operate and provide services to local community.

Importantly the site is vacant and has not functioned in any manner relative to the existence of community and or either council's operations, services to community and or financial management fundamentals.

Should the boundary change eventuate with the area consolidated into the City of Marion, the Council is well placed and positioned to ensure that both the shopping and residential

developments will orderly and economically integrate within Councils operations, representation and advocacy.

The City of Marion is a larger Council, has greater financial capacity and capability to integrate the site, its development and ongoing operations into its whole of community approach to community services.

The City of Holdfast Bay will not be materially impacted in any consequential manner relative to its operations and or financial position given that the Site is vacant and would not have been otherwise provided for in current or future service provision considerations.

In summary:

- The City of Marion has the capacity to manage the site, leveraging its existing administrative and infrastructure capabilities.
- The City of Holdfast Bay is not significantly impacted by the boundary change, as the land is currently vacant and does not contribute meaningfully to its financial or operational base.
- Consolidation ensures orderly integration of services, including stormwater, roads, and community infrastructure, within Marion's existing systems.

(iv) a council should offer its community a reasonable range of services delivered on an efficient, flexible, equitable and responsive basis.

Both councils involved in this matter currently, and into the future, will continue to provide each of their respective communities a scope of services which are fit for purpose.

The small-scale nature of the proposed boundary change will not affect either Council's capacity in this regard.

The proposed boundary change will assist both councils to be more efficient and effective resulting in more equitable and responsible service delivery by avoiding service delivery duplication and streamline the resulting interface once the shopping centre is developed and operational.

The integrated nature of the shopping centre development and adjoining residential development dictates that services provided by the same council would benefit future retail and commercial occupants of the shopping centre and residents alike.

This would result in a more efficient and fit for purpose outcome if otherwise provided by two councils, should a boundary change not result.

As previously publicly reported by the City of Marion in its original General Proposal, the following is agreed and presented in respect to the alignment of the boundary change to this Principle:

The City of Marion provides its community with an expansive list of services, programs and a strong investment program in civic infrastructure. These include:

- *community facilities and programs including libraries and neighbourhood centres and community halls;*
- *sport and recreation infrastructure and programs;*
- *a business hub;*

- *significant local roads upgrades. An annual renewal and maintenance program for roads, footpaths and storm-water;*
- *waste management services;*
- *investment and maintenance for open space;*
- *a significant commitment to tree planting on both council-owned and state-owned roads;*
- *General administrative services are also provided with Council's Administration Hub and Chamber within very close proximity to this site*

The City of Marion has a cross-council collaborative relationship with the Cities of Charles Sturt and Port Adelaide Enfield. This relationship results in shared resources across the councils along with shared procurement to increase the cost efficiencies in delivering services to the community.

This relationship has been highlighted by the Productivity Commission as an effective approach to Local Government operations that should be considered by other Councils

A regional subsidiary, the Southern Region Waste Resource Authority, established by the Cities of Onkaparinga, Marion and Holdfast Bay is responsible for providing and operating waste management services on behalf of constituent councils.

Once developed, as anticipated, the site will provide a range of services and facilities for use of the new and surrounding community including medical, childcare, and a shopping centre. Open space will provide connectivity to existing walking trails in the area.

In summary:

- Service delivery for the integrated residential and shopping centre development will be more effective if managed by one council.
- Consolidation avoids duplication in the delivery of multiple service outcomes, such as waste management, infrastructure maintenance, and community engagement services.
- Marion's proximity to the site and established administrative resources ensure timely and responsive support for future residents and businesses.

(v) a council should facilitate effective planning and development within an area and be constituted with respect to an area that can be promoted on a coherent basis.

The proposed boundary change will have more beneficial consequences in seeking to achieve effective planning and development outcomes if consolidated within the City of Marion area given the shopping centre forms part of and is integrated with the balance of the southern portion of the residential development site.

The facilitation and integration of new infrastructure associated with both the shopping centre and residential developments, coupled with the orderly development and creation of a new community on and within the vicinity of the land subject, will result in a more consolidated and balanced development outcome that would otherwise be the case if the land was to either remain divided by way of the current council boundary alignment and or form part of the City of Holdfast Bay Council area.

Having already been approved, all efforts have been directed at ensuring the configuration and formation of the shopping centre development and the associated residential development is to

occur in the best possible manner to ensure good planning and development outcomes are achieved.

It is the ongoing establishment and operational nature of both the shopping centre and residential developments moving forward that will benefit from the council boundary change as proposed.

Once established the ongoing service delivery and maintenance of the shopping centre and residential development's public assets, roads, footpaths, stormwater, open space etc will be more effectively achieved by one local government authority, not two.

The coexistence of both the shopping centre site and related residential development will on an ongoing basis be more coherent relative to community activity and interest if integrated in a complete sense with the southern City of Marion community.

In summary:

- Aligning the site with the City of Marion ensures the cohesive development of both the shopping centre and associated residential areas.
- Marion's existing infrastructure investments and strategic plans (e.g., roads, community spaces) directly support the area, enhancing long-term planning outcomes.
- Integrating new infrastructure—such as open spaces and walking trails—within one council promotes sustainable and unified growth.

(vi) a council should be in a position to facilitate sustainable development, the protection of the environment and the integration of land use schemes.

A change to the council boundary related to and because of the shopping centre development to occur on the site, would achieve more sustainable medium to long term balanced environmental, sustainable and integrated development outcomes if consolidated within the City of Marion.

Both the shopping and residential developments occurring on the site are to be staged in an integrated manner with community identity, enjoyment and belonging outcomes created and integrated into the adjoining and broader urban fabric context.

In summary:

- Marion's strategic focus on sustainability and environmental integration aligns with the planned development's goals, ensuring effective implementation of environmental initiatives.
- Consolidating the site under the auspice of the City of Marion will provide for more consistent application of land use, development and environmental policies.

(vii) a council should reflect communities of interest of an economic, recreational, social, regional or other kind, and be consistent with community structures, values, expectations and aspirations.

Irrespective of the decision to change the Council boundary as detailed by this submission, both councils will continue to function, represent and advocate for their respective communities as they are governed to do, ensuring community of interest outcomes are not compromised.

However, the new community to be created (both in respect to the shopping centre and residential development), will as is presented in this submission, be better consolidated with the existing broader community and represented and advocated for by the City of Marion.

As previously publicly reported by the City of Marion in its original General Proposal, the following is agreed and presented in respect to the alignment of the boundary change to this Principle:

The City of Marion's Strategic Plan 2019-2029 was developed from a widely consulted Community Vision- Towards 2040.

Six community themes provide strategic direction; Liveable, Valuing Nature, Innovation, Prosperous, Connected and Engaged. The themes address:

- *economic*
- *social*
- *sport and recreational,*
- *community engagement,*
- *innovation and environmental aspirations that are important to our community.*

Council's 4 Year Business Plan 2019-2023 outlines the key initiatives that Council intends to deliver to support the community themes.

Council's commitment to these aims is reflected in our community satisfaction.

Regionally the Council invests in key assets both Council and State owned, including:

- *Coastal Walkway*
- *Oaklands rail upgrades*
- *Glenthorne National Park and partner state funding*
- *Southern Soccer Facility and Sam Willoughby International BMX track (partnership with State Government and the City of Onkaparinga within the City of Marion at Majors Road)*
- *Animal management*
- *Key educational and retail precincts including Westfield Marion, Castle Plaza, Tonsley Innovation District.*

To the community of Seacliff Park and Marino, the 4 Year Business Plan commits to significant upgrades of key infrastructure including the Marion Golf Park (on the southern boundary of the subject land), Marino Community Hall and the nearby Coastal Walking Trail to enhance recreational and social opportunities for residents and visitors.

Furthermore, the Cove Civic Centre library is located 4.1 kms south and includes a business hub and community spaces for public use

The City of Marion's average residential rate remains among the lower rating metropolitan councils with a one percent increase in the 2021-22 financial year. In 2020-21, the City of Marion had the lowest average residential rate compared to neighbouring councils (Cities of Holdfast Bay, Onkaparinga, and Mitcham).

In summary:

- Marion's Strategic Plan 2019-2029 (and as updated by way of City of Marion Strategic Plan 2024-2034) emphasizes community engagement, liveability, and innovation—all relevant to the proposed development.
- Community amenities such as the Cove Civic Centre and proximity to key assets like Westfield Marion and local libraries demonstrate Marion's capacity to serve future residents effectively.
- Integration fosters a sense of belonging and shared identity, consistent with Marion's existing community structures.

(viii) a council area should incorporate or promote an accessible centre (or centres) for local administration and services.

The size, configuration and positioning of the site and its future development relative to both future shopping and residential increased activity will be better provided for within the City of Marion's scope and breadth of local administration and services offerings to community.

As previously publicly reported by the City of Marion in its original General Proposal, the following is agreed and presented in respect to the alignment of the boundary change to this Principle:

It is likely that future communities at the subject land will frequent key locations within the City of Marion boundary:

1) Marion Regional Centre (3.7km from the subject land) - includes Westfield Marion, the State Aquatic Centre, Bunnings, Government services, entertainment venues and surrounding specialty businesses including a 24 hour gym and Local Health network.

2) The Marion Cultural Centre Library is another key service offered at this site.

3) The City of Marion Administration Centre is located 100 metres from Westfield Marion located on Sturt Road, Sturt.

4) The Cove Civic Centre (City of Marion asset) is located 4.1km to the south at Hallett Cove and includes a library, business hub and community spaces for hire. Access to comp

(ix) the importance within the scheme of local government to ensure that local communities within large council areas can participate effectively in decisions about local matters.

The City of Marion's strong focus on community engagement, including public consultations and accessible decision-making forums, ensures the new community's voices will be heard.

As previously publicly reported by the City of Marion in its original General Proposal, the following is agreed and presented in respect to the alignment of the boundary change to this Principle:

The City of Marion is focused on promoting community engagement in decision making through strong community engagement, this includes:

- *Extensive community engagement on project and program initiatives, enabled through multiple modes of communication including public meetings, hard copy and online engagement material*
- *Engagement on the Council's priorities for the community through consultation on the Annual Business Plan.*

- *Links directly with the community and connection through community groups such as the 5049 Coastal Community Association.*
- *New residents within the City of Marion are strongly encouraged to participate in all Community Engagement matters that they feel passionate about.*

(xi) residents should receive adequate and fair representation within the local government system, while over-representation in comparison with councils of a similar size and type should be avoided (at least in the longer term);

The proposed boundary change aligns the development with Marion's Coastal Ward, which has the capacity and elected representatives to accommodate the additional population and activities.

As previously publicly reported by the City of Marion in its original General Proposal, the following is agreed and presented in respect to the alignment of the boundary change to this Principle:

The subject land is currently vacant. It lies within the Coastal Ward which covers the key coastal suburbs and is represented by two elected members.

A Representation Review completed in 2020 outlined 10,300 electors with two ward members, representing a quota of 5150.

The residential development once complete indicate a potential for 1000 to 1300 residents.

(xii) a scheme that provides for the performance of functions and delivery of services in relation to 2 or more councils (for example, a scheme for regional governance) may improve councils' capacity to deliver services on a regional basis and therefore offer a viable and appropriate alternative to structural change; and

Both councils already collaborate regionally (e.g., **Southern Region Waste Resource Authority**).

While regional collaboration has proven effective in certain contexts, the unique circumstances of this proposal—integrated development spanning two council areas—necessitate structural boundary change to ensure cohesive governance and service delivery.

Conclusion

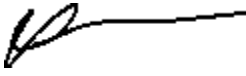
The proposed boundary change is very minor, involves one ratepayer, and is consistent with the Principles contained in section 26 of the Act and addresses economic efficiency, community cohesion, effective service delivery, and sustainable development.

By consolidating the site within the City of Marion, the proposal facilitates better community of interest outcomes for residents, businesses, and the affected councils alike.

I look forward to receiving a response from you as to whether the Commission accepts this administrative proposal including for the purposes of making its inquiries, undertaking any consultation (if deemed necessary), and consulting with the Minister.

Of course, please don't hesitate to contact the undersigned should you require any further information for this purpose.

Kind regards



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