



District Council of Grant

Strategic Land Use Priorities

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October 2024

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Executive Summary

The *District Council of Grant Strategic Management Plan 2020 - 2030* (SMP) outlines the vision, mission and strategies for the district, communities and people of Grant for the period 2020 to 2030.

Strategies to achieve the vision are grouped under five (5) strategic goals:

- Develop vibrant and connected coastal and rural communities.
- Support a prosperous local economy.
- Retain and enhance our natural and built environments.
- Provide quality services and infrastructure.
- Lead and engage with our communities.

To help guide the implementation of strategies within the SMP, Council has engaged MasterPlan to undertake a Strategic Land Use Priorities review. This project is focused on reviewing the supply and demand of land to accommodate future growth within the district, including land for residential and industrial uses.

Industrial Growth Methodology

This part of the project has primarily considered the recommendations contained in Council's 2016 *Industrial Land Review and Master Plan* (ILR), prepared by URPS. Based on the investigations and consultation undertaken the ILR made a number of recommendations, mostly related to individual sites already zoned for industrial use.

MasterPlan has undertaken a review of changes that have occurred in the six years since the ILR was completed, focusing on:

- Implementation in July 2020 of the State-wide Planning and Design Code.
- The number of residents employed in the manufacturing sector, using 2021 Census figures.
- A desktop review of the extent of new development that has taken place on the sites considered in the ILR.

In addition, in December 2022, MasterPlan staff had preliminary discussions with staff from the District Council of Grant, the City of Mount Gambier, Wattle Range Council and Regional Development Australia - Limestone Coast that have informed the review.

As a result of this work a number of recommendations have been presented for Council's consideration, including initiation of Code Amendments to facilitate desired zoning changes.



Industrial Growth Recommendations

As a result of this work a number of recommendations have been presented for Council's consideration, including initiation of Code Amendments to facilitate desired zoning changes.

Considering the information presented above it is recommended that the District Council of Grant implement the 2016 Industrial Land Review and Master Plan, excluding exceptions described in **Section 3.4**. These exceptions relate to industrial land at Mount Schank, land located close to the Mount Gambier Airport and land located on Lake Terrace East.

In addition to implementing the ILR it is recommended that Council work on the following opportunities:

- Work with the State Planning Commission to include relevant policy in the Limestone Coast Regional Plan that will support implementation of the ILR recommendations, in particular, the recommended rezonings.
- Support the preparation of a business case by the Regional Development Australia - Limestone Coast proposing a new intermodal terminal just to the north-east of the Saleyards, to facilitate movement of freight by rail (as opposed to by road), to the Port of Portland, Melbourne, Adelaide and elsewhere in Australia. The business case will be put to Infrastructure Australia to secure support and funding.
- Investigate the creation of a Regional Industrial Park at Glenburnie adjacent to the Saleyards that builds on the success of the Saleyards operations, and which will be able to support and capitalise on the opportunity an intermodal terminal could provide.
- Monitor closure of the Millicent Saleyards by the Wattle Range Council and consider the implications for the Glenburnie Saleyards.
- In conjunction with relevant stakeholders identify a suitable location for a precinct to accommodate coastal crayfish processing operations at Port MacDonnell. Council may wish to consider the Boat Yard site as a potential location, consistent with the recommendations of the ILR. Inclusion of a visitor facility and restaurant would create the opportunity to expand the business.

Residential Growth Methodology

This part of the project has focused on growth modelling to determine the spatial requirements to house an increased population in the Council area. This has included review of:

- Housing and population statistics from the 2021 Census.
- Hypothetical growth scenarios for an increased population.
- Relevant spatial parameters - average household size, range of allotment sizes, land required for provision of public infrastructure such as roads, open space, drainage.
- Aggregate land required to achieve growth scenarios.



- Spatial analysis of growth options in and around each township, Port MacDonnell, coastal and riverine townships and rural living areas. This has taken into account the findings of previous master plans prepared for Council - the River and Coastal Communities Urban Design Framework (2014) and the Rural Living and Township Zone Boundaries Review and Master Plan (2020).
- Estimation of additional allotment yield and population increase for each location.

The modelling does not mean that all the population growth will occur, but it allows an estimation to be made of allotment yield and population growth that may be possible. It also allows for planning where (and how) growth could occur.

Residential Growth Recommendations

In an overall sense, the modelling undertaken and outlined above demonstrates that a large supply of land for residential growth in the Council area exists. Growth can occur within and immediately adjacent to existing townships (including along the coast and rural living areas).

The range of allotment sizes that have been modelled demonstrates that growth in Grant can occur at densities lower than in the City of Mount Gambier, allowing the existing rural character and point of difference (to the City) to be retained.

This in turn means that no significant loss of primary production land with high capability/suitability should occur as the Council's population grows.

Future high-level infrastructure investigation will allow further refinement of the modelling.

To realise a number of the growth opportunities described above, a Code Amendment or multiple Code Amendments will be required to make required changes to the Planning and Design Code.

Given the multiplicity of sites and land owners, it is recommended Council undertake the Code Amendment(s) rather than leaving it to individual land owners to pursue separate Code Amendments for their own land. Prior to proceeding Council will need to consult with land owners to gauge their support for having their land rezoned.

Subject to agreement from land owners, and support of the State Planning Commission, the Code Amendment(s) would include the following:

1. Rezone land at Allendale East from Rural Living Zone to Township Zone, and adjust the minimum site area TNV for the Township Zone to 800 square metres.
2. Decrease the minimum site area for the Rural Living Zone at Allendale East to 1,300 square metres.
3. Rezone land at Yahl from Rural Horticulture Zone and Rural Zone to Township Zone.



4. Rezone two small areas at Tarpeena from Rural Zone to Township Zone, and adjust the minimum site area TNV in the Township Zone to 800 square metres or 1,300 square metres depending on location.
5. Rezone land at Worrolong from Rural Zone to Rural Living Zone with a minimum site area TNV of 1.0 hectares.
6. Rezone land at Suttontown B from Rural Living Zone to Rural Neighbourhood Zone with a minimum site area TNV of 3,000 square metres.
7. Rezone land at Mil Lel B from Rural Zone to Rural Living Zone with a minimum site area TNV of 1.0 hectares.
8. Pursue policy for land at Compton which consolidates the current Rural Living Zone and Neighbourhood Zone into a single Rural Neighbourhood Zone with a minimum site area TNV of 1,300 square metres and a policy requirement for an average allotment size across land divisions of 1,800 - 2,000 square metres together with a requirement for all allotments of less than 3,000 square metres to be connected to a reticulated wastewater treatment system.

Code Amendments of this scale and complexity generally take approximately 18 months to two years to complete. This includes a formal consultation period of at least six weeks.

Next Steps

This report puts forward a number of recommendations, for both industrial growth (**Section 4.5**) and residential growth (**Section 5.9**). Code Amendments will be required to implement a number of these, to implement the ILR and to rezone land for residential growth. Following community engagement and adoption of the report by Council, it is proposed to focus on input into Limestone Coast Regional Plan, with a more specific action plan for the implementation of recommendations to be developed following the conclusion of that process.

The key actions for Council in the short term include:

1. Engage with the Minister for Planning, State Planning Commission and Planning and Land Use Services (PLUS) to provide continued input to the preparation of the Limestone Coast Regional Plan prior to statutory consultation commencing.
2. Continue to engage with land owners whose land is included in the recommended Code Amendments, to gauge support for their land being rezoned.
3. Further engage with the Minister for Planning, State Planning Commission and PLUS during formal consultation of the Limestone Coast Regional Plan to ensure preferred strategic growth for Grant is included and can act as a basis for the commencement of the recommended Code Amendments.
4. Following the completion of formal statutory consultation on the Limestone Coast Regional Plan undertake a review of Council actions and revise the strategy as required.
5. Following the completion and publication of the Limestone Coast Regional Plan, undertake a review of Council actions, and develop an implementation plan for the recommendations contained in this report.



Following this engagement, it will be possible to initiate the recommended Code Amendments, subject to any further investigative work required being undertaken, based on a level of community support and endorsement via the regional planning process.

A process to streamline Code Amendments to rezone land identified in the Regional Plan has been flagged, however, the details for this process have not yet been communicated. This opportunity should continue to be monitored.

It is noted that Council has recently undertaken two additional packages of work relating to future strategic opportunities:

1. Prepare a prospectus that can be presented to stakeholders to promote the potential creation of a Regional Industrial Park at Glenburnie adjacent to the Saleyards.
2. Engage with relevant stakeholders to identify a suitable location for a precinct to accommodate coastal crayfish processing operations at Port MacDonnell and prepare a prospectus to promote the opportunity.

Depending on the progress of these two opportunities and agreement about site specific development concepts, Code Amendments are likely to be required to put in place relevant zoning and policy frameworks at each location.

Council-Wide Growth Areas Map

A map of the Grant Council area has been prepared that shows the location of each of the industrial and residential growth areas discussed in this report. The map is shown in **Figure 1**.

The map also shows the indicative locations of bypass routes that would allow heavy vehicle traffic to bypass the City of Mount Gambier when travelling to or from Adelaide and/or Melbourne and Portland.

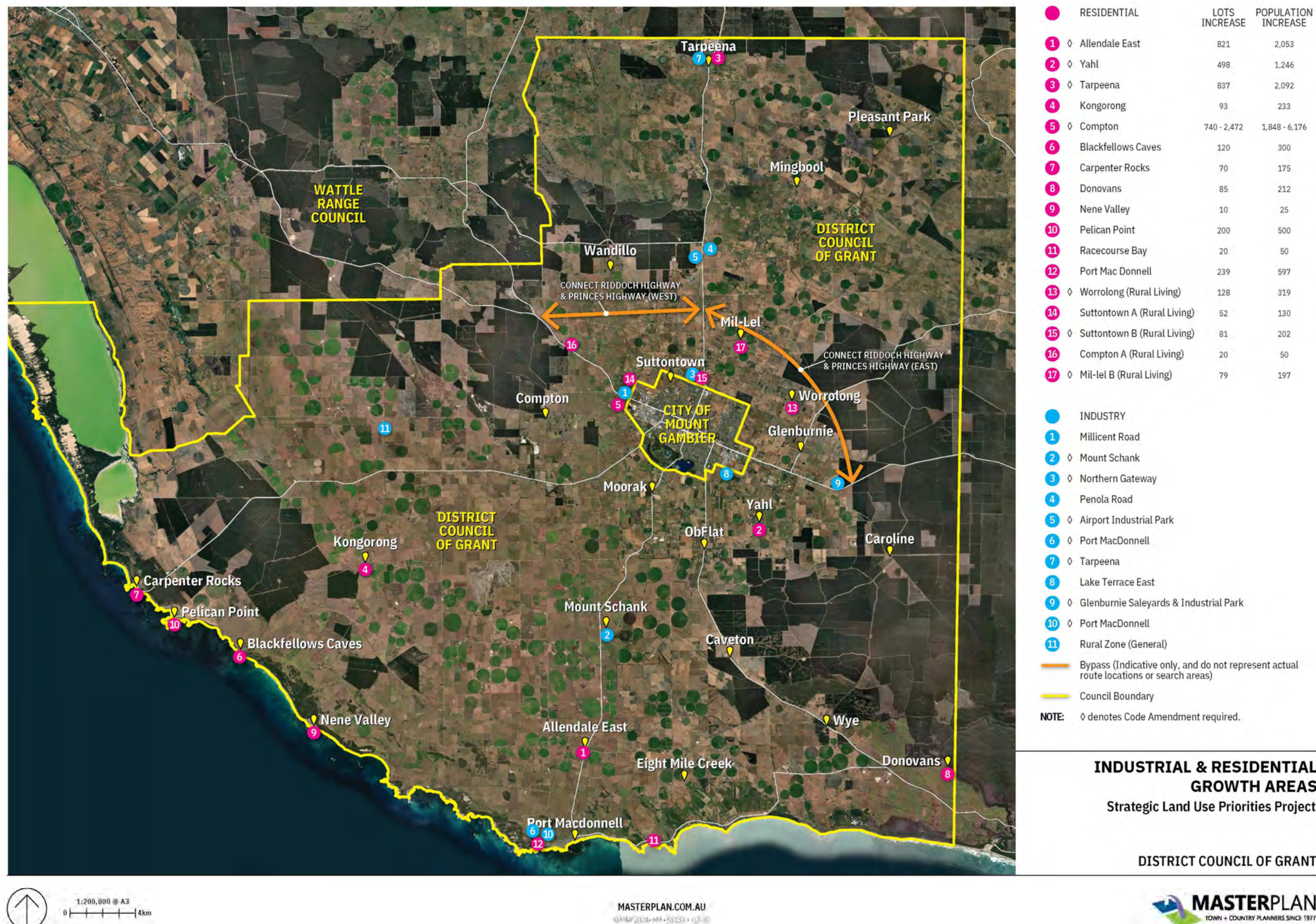


Figure 1: Grant Council area



1 Introduction

The *District Council of Grant Strategic Management Plan 2020 - 2030* (SMP) outlines the vision, mission and strategies for the district, communities and people of Grant for the period 2020 to 2030.

Strategies to achieve the vision are grouped under five strategic goals:

- Develop vibrant and connected coastal and rural communities.
- Support a prosperous local economy.
- Retain and enhance our natural and built environments.
- Provide quality services and infrastructure.
- Lead and engage with our communities.

To help guide the implementation of strategies within the SMP, Council has engaged MasterPlan to undertake a Strategic Land Use Priorities review. This project is focused on reviewing the supply and demand of land to accommodate future growth within the district, including land for residential and industrial uses.

Council is also keen to provide guidance for the future growth of Grant that is sympathetic to but different to the neighbouring City of Mount Gambier. Residents voted overwhelmingly (91 per cent) in the recent Council amalgamation plebiscite that District Council of Grant should not amalgamate with the City Council, indicating a strong community desire for the Council to continue to plan for the long-term future of the district in a manner distinct from that of the city.

Council is well placed in that it has a number of recently prepared master plans, including:

- River and Coastal Communities Urban Design Framework (2014).
- Industrial Land Review and Master Plan (2016).
- Rural Living and Township Zone Boundaries Review and Master Plan (2020).
- Inner Townships Master Plan (2023).

Collectively these documents provide detailed assessment and priority actions relating to key land uses in the Council. Unfortunately, there has been limited implementation of the recommendations embodied within each of the plans, to date, due in part to the State Government's planning reform program which meant Councils across the state had to put the majority of local policy change 'on hold' for an extended period of time.

The reform program resulted in the new Planning and Design Code (the Code) being implemented across South Australia. Councils and private proponents are again invited to propose changes to the policies, rules or mapping within the Code.



In addition, the State Planning Commission has commenced preparation of Regional Plans across South Australia, including one for the Limestone Coast. Regional Plans provide a long-term vision for a region to guide land use planning over a 15-to-30-year period, with a particular focus on the integration of land use, transport infrastructure and public realm.

The Strategic Land Use Priorities project will form an important input to the Regional Plan for the Limestone Coast, ensuring growth opportunities within the District Council of Grant are accurately described and able to be used to support potential Code Amendments required to support that growth.



2 Methodology

The Strategic Land Use Priorities project is focused on two types of growth:

- A review of supply of land for industrial development throughout the Council area.
- How population growth can be spatially accommodated within the Council area over a short, medium and long term.

Each of these has required its own methodology, and this is reflected in the structure of this report.

Whilst the report has primarily been developed as a data analysis report to support Council decision making and input into the development of the Limestone Coast Regional Plan by the State Planning Commission, Council has resolved to seek public feedback on the report during early-2024, with this public feedback utilised to further enhance the input that Council can provide into the regional planning process.

2.1 Industrial Growth Methodology

This part of the project has primarily considered the recommendations contained in Council's 2016 Industrial Land Review and Master Plan (ILR), prepared by URPS. Based on the investigations and consultation undertaken the ILR made a number of recommendations, mostly related to individual sites already zoned for industrial use.

MasterPlan has undertaken a review of changes that have occurred in the six years since the ILR was completed, focusing on:

- Implementation in July 2020 of the State-wide Planning and Design Code.
- The number of residents employed in the manufacturing sector, using 2021 Census figures.
- A desktop review of the extent of new development that has taken place on the sites considered in the ILR.

In addition, in December 2022, MasterPlan staff had preliminary discussions with staff from the District Council of Grant, the City of Mount Gambier, Wattle Range Council and Regional Development Australia - Limestone Coast that have informed the review.

As a result of this work a number of recommendations have been presented for Council's consideration, including initiation of Code Amendments to facilitate desired zoning changes.

2.2 Residential Growth Methodology

This part of the project has focused on growth modelling to determine the spatial requirements to house an increased population in the Council area. This has included review of:

- Housing and population statistics from the 2021 Census.
- Hypothetical growth scenarios for an increased population.



- Relevant spatial parameters - average household size, range of allotment sizes, land required for provision of public infrastructure such as roads, open space, drainage.
- Aggregate land required to achieve growth scenarios.
- Spatial analysis of growth options in and around each township, Port MacDonnell, coastal and riverine townships and rural living areas. This has taken into account the findings of previous master plans prepared for Council - the River and Coastal Communities Urban Design Framework (2014) and the Rural Living and Township Zone Boundaries Review and Master Plan (2020).
- Estimation of additional allotment yield and population increase for each location.

The modelling does not mean that all population growth will occur, but it allows an estimation to be made of allotment yield and population growth that may be possible. It also allows for planning where (and how) growth could occur.

As a result of this work a number of recommendations have been presented for Council's consideration, including initiation of Code Amendments to facilitate desired zoning changes.

2.3 "Sounding" Workshop

On 4 May 2023, Council and the Regional Development Australia Limestone Coast (RDALC) hosted a "sounding" workshop where the results of the work described above were presented and discussed. The workshop was held at the Barn Steakhouse at OB Flat. Approximately 20 participants from a range of industries attended (as well as Council and RDALC staff), invited using Council and RDALC databases.

Feedback from participants was focused on a number of key themes, which are described below.

2.3.1 Key Themes - Industrial Growth

Key themes related to industrial growth were:

- A need to support industry diversification was identified - more processing and secondary industries.
- There was a view that industrial growth should be located to the north and east of the City of Mount Gambier, to maximise transport linkages.
- There was support for development of an industrial precinct at the Glenburnie saleyards. There was a preference that an industry precinct is developed in the shorter term prior to getting the railway connected via an intermodal.
- There was support for land to be set aside at Port MacDonnell to support the lobster industry - processing and retail components.
- There was support for industrial development at the Mount Gambier airport.
- There was a desire for road upgrades to support industry - bypasses north and south of the City, and a dual highway north of the City.
- It was identified that there is a limited workforce to support economic growth and diversification. In particular there is a limited number of people with appropriate skills. Appropriate training opportunities locally, and migration of skilled workers were suggested to help address this.



- A need to protect primary production from residential encroachment was identified. Concern regarding interfaces between residential areas and farming/horticulture was expressed. Linear residential development not supported.
- There was concern about loss of quality primary production land to industrial development - for example at Millicent Road, Mount Schank and Lake Terrace East.

2.3.2 Key Themes - Residential Growth

Key themes related to residential growth were:

- There was general support for residential growth, coupled with appropriate infrastructure and in locations that do not undermine primary production activity.
- It was identified that there is a lack of affordable housing for workers in the district. More affordable accommodation is required.
- A need to coordinate residential development with infrastructure availability (sewer, water etc) was expressed, as well as social infrastructure (schools, services etc).
- It was considered that rural living on the fringe of the City of Mount Gambier is not supported as it constrains efficient use of infrastructure, and that any additional rural living should be located further from the City.
- It was considered that rural living can be an inefficient use of agricultural land. Support was expressed for smaller allotment sizes in any future rural living areas.
- There was support for residential growth of townships to support schools, shops etc.
- It was expressed that land capability analysis should be considered in decision-making for locations for residential growth.
- It was identified that there is a need to ensure residential growth does not impact on key industrial transport routes.

2.4 Elected Member Briefing – June 2023

On 5 June 2023 MasterPlan presented the methodology, consultation outcomes and draft recommendations of the Strategic Land Use Priorities project to the Elected Members of the District Council of Grant. As a result of discussions, the Elected Members requested that a small number of changes be made to the report as follows:

- That all of the land zoned Strategic Employment as Mount Schank be rezoned to the Rural Zone, not just the northern portion as originally recommended in the ILR.
Mount Schank is located a significant distance from Mount Gambier and is relatively isolated. There has been no interest materialise in developing any of the land zoned for industry. Strategically, it is considered that industrial growth is better located to the north and east of the City, to optimise transport linkages.



The zoned areas (both the northern and southern portions) directly adjoin the Mount Schank State Heritage Area. Retaining the areas for farming purposes will better seek to preserve the open landscape character and views to the State Heritage Area.

- That the northern portion (with frontage to Ridge Road) at the Penola Road Policy Area 4 close to the Mount Gambier Airport retain its zoning as Strategic Employment. It is currently the only available zoned land for industry at this locality.
- That investigations are not undertaken to identify an alternative site for industry on the eastern side of Riddoch Highway close to the Mount Gambier Airport. Council's preference for future industrial growth at this locality is to create an industrial park on surplus land at the airport.
- That the project ensures that protection of land zoned for primary production purposes (Rural and Rural Horticulture) is integral to all decisions on where future industrial and residential growth are located.

The changes requested by the Elected Members are considered reasonable and appropriate, and have been incorporated into the report, and in particular into **Attachment 2**, the review of the recommendations from the Industrial Land Review.

2.5 Engagement with City of Mount Gambier

In October and November 2023, two workshops were held with senior staff and Elected Members from the City of Mount Gambier to brief on the work that the District Council of Grant has undertaken in the Strategic Land Use Priorities project, with a particular focus on those areas in proximity to the shared Council boundary.

In the context of the regional planning process, these sessions provided the opportunity for a sharing of information in respect of the outcomes of the Strategic Land Use Priorities project, and other work undertaken by both councils in planning for population growth and future development.

The feedback from the sessions indicated significant agreement in the positions of the District Council of Grant and the City of Mount Gambier with several key areas in the vicinity of the boundary identified as those presenting key challenges in the management of future development opportunity.

The City of Mount Gambier provided some written feedback to District Council of Grant which will inform further strategic planning work moving forward.

2.6 Elected Member Briefing – October 2023

A further elected member briefing with District Council of Grant was held on 12 October 2023. This session provided for consideration of the recommendations which had been outlined when the report was prepared, with some refinements made to the recommendations, including:

- Removal of the potential future Employment Zone at Lake Terrace East given the proximity of this land to sensitive receivers and the overall amount of land available for industry development.



- Develop a third density option for Compton, based on an average allotment size of 2,000 square metres.

2.7 Community Engagement

Council resolved to seek community feedback on the Strategic Land Use Priorities report, with this public feedback used to validate the SLUPP report and define Council's input into the regional planning process. It was also envisaged that this information may assist the community with making informed submissions when engagement on the Limestone Coast Regional Plan is undertaken by the State Planning Commission.

The following documents were prepared by MasterPlan for publication on the Your Say DC Grant community engagement platform over the 3-week consultation period from 5 April 2024 to 29 April 2024:

- the Strategic Land Use Priorities Plan (full report)
- a Strategic Land Use Priorities Plan summary report
- Strategic Land Use Priorities Plan Online Survey
- written submission template (online or via email).

A dedicated project page was created on Your Say DCG (Strategic Land Use Priorities) for the community to read background information on the project, understand what is proposed, how to have your say, the project's timeline, and view the full Draft Strategic Land Use Priorities Project and summary documents.

During the engagement period, social media posts and stories were scheduled on Facebook, Instagram and LinkedIn which gained a total of 3,143 views across all three sites and five posts. Details of the consultation were uploaded to Council's main website within the Public Notices section alongside a media release in the Latest News section. This media release was also distributed to local media sources.

Following the engagement period, a 'What we heard' report was prepared collating the feedback received.

2.8 Elected Member Briefing – June 2024

Following preparation of the 'What We Heard' report, a further workshop with Elected Members and the consultant team who have prepared the Strategic Land Use Priorities Project report was held on 20 June 2024. The purpose of this workshop was to review the community feedback received during the consultation process, and to ask questions and discuss those issues which still required further consideration prior to Council considering the final report for adoption.

The key issues for further consideration included:

1. Compton density and character and consideration of the strengths and weaknesses of the three density options now presented in the report.
2. Lake Terrace East employment lands expansion area and its potential removal from the areas earmarked for future industrial development.



3. Yahl expansion suitability having regard to feedback from the City of Mount Gambier.

2.9 Adoption of Report

At its meeting on 15 July 2024, Council resolved to receive, note and approve the Strategic Land Use Properties Project report, subject to the inclusion of the findings contained in the 'What We Heard' report and including adoption of the recommendations contained in the memo prepared following the engagement and subsequent Elected Members workshop. The final version of the report has been updated to reflect the resolution of Council.



3 Industrial Growth

This part of the project has primarily considered the recommendations contained in Council's 2016 Industrial Land Review and Master Plan, prepared by URPS. Preliminary discussions have also been held with senior staff from the District Council of Grant, the City of Mount Gambier, Wattle Range Council and Regional Development Australia - Limestone Coast.

It should be noted that individual land owners have not been consulted - this will be an essential first step for Council where rezonings are recommended to be initiated.

3.1 Industrial Land Review and Master Plan

In 2016 the District Council of Grant engaged URPS to undertake an Industrial Land Review and Master Plan (ILR). Council's stated purpose for the ILR was for it *"to guide the future zoning of land for industrial purposes and future sustainable industrial development activity within the Council area"*. It was considered that the ILR should ideally provide a rolling 15-year 'industrial land bank' to ensure a planned supply of industrial land is available to meet future demand on an ongoing basis.

The ILR includes a thorough review of the issues related to industrial development, including:

- strategic context
- zone policies under the Grant Council Development Plan
- supply and demand of land for industrial purposes
- the role of infrastructure
- separation distances
- the Blue Lake Groundwater Capture Area and Buffer Area
- bushfire risk.

The review was also informed by a significant level of consultation, including with Council's Elected Members and staff members, City of Mount Gambier Council staff, Regional Development Australia - Limestone Coast, Department of State Development and community meetings/workshops with invited attendees and the general community.

Based on the investigations and consultation undertaken the ILR made a number of recommendations, mostly related to individual sites already zoned for industrial use. The overall effect of the recommendations would result in the combined area zoned for industrial purposes being reduced from the current 345 hectares to some 215 - 305 hectares. It was considered this would far exceed the desired requirement for the rolling 15-year 'industrial land bank' considered necessary to meet future demand.

The recommendations from the ILR are listed in brief below. **Attachment 1** is an extract from the ILR and shows the location relevant to each recommendation (the numbers on the map relate to the number for each recommendation below).



1. Retain Millicent Road Policy Area 1.
2. Rezone part of Mount Schank Policy Area 2 to Primary Production Zone.
3. Retain the Northern Gateway Policy Area 3 and extend it to the west, subject to further investigations.
4. Rezone two portions of Penola Road Policy Area 4 to Primary Production Zone and consider rezoning an alternative portion with frontage to the Riddoch Highway.
5. Retain the three portions at Port MacDonnell Policy Area 5 and consider options for further development of the Boat Yard portion (including an extension to the west).
6. Retain the eastern portion of Tarpeena Policy Area 6 (Timberlink Australia site) and rezone the western portion that accommodates forest plantation and electricity transmission lines to Primary Production Zone.
7. Remove 'general industry' from the non-complying list in the Primary Production Zone and retain the current policy position that supports the potential for light and service industry in a range of zones.
8. Amend policy in the Airfield Zone at Mount Gambier Airport to loosen the nexus between light, service industry and warehousing with aviation activities.
9. Investigate a site on Lake Terrace East as a potential site for light industry/commercial development in the longer term.

As stated previously, there has been limited implementation of the recommendations embodied within the ILR to date, in part due to the State Government's planning reform program which meant Councils across the state had to put local policy change 'on hold' for a period of time.

3.2 Changes Since November 2016

In the six years since the ILR was completed the Planning and Design Code (the Code) has been implemented across South Australia and first release results of the 2021 Australian Census are now available for DC Grant.

In addition, a desktop review has been undertaken to determine the extent to which, the sites considered in the ILR have been developed.

3.2.1 Implementation of the Planning and Design Code

As part of the State-wide reform of the planning system, in July 2020 the Code commenced operation for Phase 2 Councils, including the District Council of Grant. The Code has replaced all Council Development Plans to become the single source of planning policy for assessing development applications.

The transition to the Code has brought in a number of relevant changes, in particular:

- The Industry Zone (and Policy Areas referred to in the ILR) have transitioned to a Strategic Employment Zone, which has a similar intent but does not have site specific policy.
- The Commercial Zone has transitioned to an Employment Zone, which has a similar intent.



- The Primary Production Zone has transitioned to a Rural Zone which has increased flexibility for industrial proposals to be considered within primary production areas.
- General policy related to issues such as interface between uses, transport access and parking have been updated.
- A number of issues such as bushfire risk, flooding and native vegetation are now applied via a series of Overlays.

3.2.2 Number of Residents Employed in the Manufacturing Sector

The 2021 Census figures show that manufacturing has declined as an industry of employment over the last ten years for residents of the District Council of Grant.

In 2011 manufacturing was ranked as the second highest employer with 503 people employed. In 2021 manufacturing had dropped to fourth with 338 people employed. This represents a 33 per cent decrease in residents employed in manufacturing jobs over ten years. This trend has occurred even though the population in Grant has increased by 10 per cent over the same period, and it is generally consistent with the City of Mount Gambier, the Limestone Coast and South Australia as a whole.

Agriculture, forestry and fishing have consistently been the highest employment sector in Grant (867 residents in 2021 - a 4 per cent increase over ten years).

The sectors with the greatest growth over the last ten years have been:

- Health care and social assistance (458 residents in 2021 - a 36 per cent increase).
- Construction (404 residents in 2021 - a 23 per cent increase).
- Education and training (285 residents in 2021 - a 16 per cent increase).

3.2.3 Development of Zoned Land

A desktop review has been undertaken to determine the extent of new development that has taken place on the sites considered in the ILR, in particular those parts that were undeveloped at the time for industrial use. With only one exception none of the sites considered in the ILR have been further developed. The exception is an energy pellet plant that has received planning approval from the State Commission Assessment Panel (SCAP) on the southern portion of Penola Road Policy Area 4 (along Hutchinson Road near Mount Gambier airport). Building approval for the proposed development is currently pending.

For the most part, the undeveloped portions of the sites in the ILR continue to be used for farming purposes, or in a small number of instances for large-block residential use. As such, the extent of industrial development on land zoned for that purpose has changed little since the ILR was prepared.



3.3 Preliminary Consultation

In December 2022, MasterPlan staff had preliminary discussions with staff from the District Council of Grant, the City of Mount Gambier, Wattle Range Council and Regional Development Australia - Limestone Coast regarding the Inner Townships Master Plan and the Strategic Land Use Project. Feedback related to future industrial and employment growth is described below.

3.3.1 District Council of Grant

- Council runs the Mount Gambier Regional Airport. This is a significant asset that costs Council to run and maintain.
- Council runs the Mount Gambier and District Saleyards (sheep and cattle). The Saleyards generate \$150-\$160 million per year of commercial activity but Council does not make money. Saleyards were built in the mid-1970s and provide significant community benefit. Council is intending to upgrade the Saleyards, with funding support from the State Government. A transportation hub is being considered for north of the Saleyards.
- The airport and Saleyards represent two major economic activities for the region but are two financial pressures for the Council. Council tends to focus funding on these two assets as they are used more broadly than other assets in the local government area (LGA).
- A pellet plant is approved to be built just north-east of the airport, in the current Strategic Employment Zone. The main chimney is only just below the building height limit - vertical influx of heat may create an issue for small aircraft, however, CASA was in support of the proposal. Concern was expressed that the approval may inhibit expansion of the runway and may be an unattractive gateway for visitors as they leave the airport.
- Potential for a business park associated with the airport.
- Support was expressed for the current zoning restriction for the airport that limits industry to that which is associated with and ancillary to aviation activities. Industry not associated with the airport is not envisaged. Council may seek a business partner in the future linked to the aviation use.
- Coastal crayfishing processing operations at Port MacDonnell were raised - these are currently located in residential areas rather than industrial areas. High saline wastewater disposal is posing to be a problem and can cause localised flooding. Recommended a separate industrial precinct be created at Port MacDonnell. Fishers are increasingly operating as home-based businesses.

3.3.2 City of Mount Gambier

- See residential growth rather than manufacturing growth for Mount Gambier in the future. They will look to Grant Council to accommodate manufacturing growth.
- They are anticipating population growth due to migrants (including domestic migrants) moving to the city.



- The Mount Gambier Regional Airport was seen as very important in supporting travel, which is considered more of a necessity now rather than a luxury. Crucial for freight movement and providing access for health specialists to get in and out of the City. Consider Mount Gambier Airport has the ability to scale up, providing small-scale freight services to support millennials working from home and mum and dad entrepreneurs.
- Discussed the Port of Portland, who are always looking for more throughput. Forestry has been important throughput to date. Provides an opportunity for the region.
- The Uni SA campus is growing as is the Flinders Rural and Remote Health SA campus. In addition, the TAFE is anticipated to expand.

3.3.3 *Regional Development Australia Limestone Coast*

- The Regional Movers Index produced by the Regional Australia Institute shows that it is millennials that are moving into regions. They see this as a positive as they bolster the working-age population - crucial as the population ages and older people leave the workforce.
- The 2018 Limestone Coast Regional Growth Strategy estimates an additional 2,000 people are required by 2026 to maintain a sustainable working-age population.
- All Councils in the region are now concerned regarding the shortage of workers, and housing for them.
- Highlighted the significance of the Mount Gambier and District Saleyards at Glenburnie. They are proposing a new intermodal terminal just to the north-east of the Saleyards, to facilitate movement of freight by rail (as opposed to by road), to the Port of Portland, Melbourne, Adelaide and elsewhere in Australia. This will require significant upgrades to the railway line to Heywood in Victoria. LCRDA are preparing a business case to be put to Infrastructure Australia to secure support and funding.
- They are keen to support value-adding businesses in rural areas.

3.3.4 *Wattle Range Council*

- Wattle Range Council are weighing up the future of the Millicent Saleyards. The Saleyards are owned by Council. Council has set a threshold of 8,500 head per year as a benchmark needed for the facility to remain sustainable. Over the past twelve months, the rolling amount has been down to approximately 5,500. A need to rectify issues raised by SafeWork and upgrade some of the ageing infrastructure is part of Council's consideration. The future of the Saleyards will be considered in 2023. The future of the Saleyards may have implications for the Glenburnie Saleyards east of Mount Gambier and the Saleyards at Naracoorte, which are the closest alternatives.

Note: Wattle Range Council resolved to close the facility as of 30 June 2023.



3.4 Review of Recommendations from the 2016 Report

The individual recommendations contained in the ILR have been reviewed noting the information above, and incorporating feedback received from Council staff. The zoning for each site under the Code has been identified, and a conclusion has been made as to whether each recommendation remains valid.

The review is contained in the table shown in **Attachment 2**.

The review has found that overall, the recommendations proposed by the ILR are still valid and worthy of implementation, with the following exceptions:

- That all of the land zoned Strategic Employment as Mount Schank be rezoned to the Rural Zone, not just the northern portion as recommended.
- That the northern portion (with frontage to Hutchinson Road) at the Penola Road Policy Area 4 close to the Mount Gambier Airport be rezoned from Strategic Employment to Rural Zone.
- That the southern portion of Penola Road Policy 4 does not need to be rezoned from Strategic Employment to Rural Zone as an energy pellet plant has been approved on the site. Consideration would be given to the rezoning of this site in future if the approved facility were not to proceed to be developed and the approval had lapsed.
- That further investigations are not undertaken to identify an alternative site for industry on the eastern side of Riddoch Highway close to the Mount Gambier Airport. Council's preference for future industrial growth at this locality is to create an industrial park on surplus land at the airport.
- Removing the restriction in the current zoning at Mount Gambier Airport requiring light industry and warehouses to be associated with and ancillary to aviation activities is no longer required, as Council wishes to create an industrial park via a rezoning of surplus airport land to Strategic Employment.
- Not proceeding with investigations or rezoning of land at Lake Terrace East to extend the existing industrial areas located within the City of Mount Gambier.

Transition to the Code has implemented two significant recommendations:

- Industries related and ancillary to primary production (including General, Light and Special Industry) are now envisaged uses within the Rural and Rural Horticulture Zones (as Performance Assessed development), which will provide greater flexibility to consider industries associated with "produce" in the zones.
- Proposals for Light Industry can be assessed within Township, Township Activity Centre, Rural Living and Employment Zones (as Performance Assessed development) maintaining flexibility in where Light and Service Industry can be located.

This ensures that proposals for industrial development can be considered across the Grant LGA in a range of zones, providing greater opportunity for value-adding businesses and greater flexibility for proponents, landowners and Council.



In an overall sense, the ILR promotes an appropriate spread of zoned land for industry throughout the Grant LGA, with zoned land to the north (Tarpeena and at the airport), close to the City (northern and western side, and eastern side in the longer term) and at Port MacDonnell.

A Code Amendment(s) is required to implement several of the recommendations:

1. Rezone all of the land at Mount Schank Policy Area 2 from Strategic Employment to Rural Zone (medium priority).
2. Extend the Strategic Employment Zone at the Northern Gateway Policy Area 3 to the west (medium priority).
3. Rezone surplus land at Mount Gambier Airport from Infrastructure (Airfield) to Strategic Employment Zone to facilitate creation of an industrial park (high priority).
4. Investigate extending the Strategic Employment Zone at the Boat Yard portion in Port MacDonnell to the west (high priority).
5. Rezone the western part of the Tarpeena Policy Area 6 from Strategic Employment to Rural Zone (low priority).

Given the multiplicity of sites and landowners, it is recommended Council undertake the Code Amendment rather than leaving it to individual land owners to pursue separate Code Amendments for their own land. Prior to proceeding Council will need to consult with landowners to gauge their support for having their land rezoned.

As Council is the landowner, Council may prefer to undertake a stand-alone Code Amendment to facilitate creation of the industrial park at Mount Gambier Airport.

Further discussion is required to agree on priorities for inclusion in the Code Amendments, and whether all the recommended zoning changes are included.

Code Amendments of this scale and complexity generally take approximately 18 months to two years to complete. This includes a formal consultation period of at least six weeks.

3.5 Conclusion

Considering the information presented above it is recommended that the District Council of Grant implement the 2016 Industrial Land Review and Master Plan, excluding the exceptions described in Section 3.4.

In addition to implementing the ILR, as amended in the recommendations of this report, it is recommended that Council work on the following opportunities:

- Work with the State Planning Commission to include relevant policy in the Limestone Coast Regional Plan that will support implementation of the ILR recommendations, in particular, the recommended rezonings.



- Support the preparation of a business case by the Regional Development Australia Limestone Coast proposing a new intermodal terminal just to the north-east of the Saleyards, to facilitate movement of freight by rail (as opposed to by road), to the Port of Portland, Melbourne, Adelaide and elsewhere in Australia. The business case will be put to Infrastructure Australia to secure support and funding.
- Investigate the creation of a Regional Industrial Park at Glenburnie adjacent to the Saleyards that builds on the success of the Saleyards operations, and which will be able to support and capitalise on the opportunity an intermodal terminal could provide.
- Monitor closure of the Millicent Saleyards by Wattle Range Council, and consider the implications for the Glenburnie Saleyards should Wattle Range Council resolve to close the Millicent Saleyards.
- In conjunction with relevant stakeholders identify a suitable location for a precinct to accommodate coastal crayfish processing operations at Port MacDonnell. Council may wish to consider the Boat Yard site as a potential location, consistent with the recommendations of the ILR. Inclusion of a visitor facility and restaurant would create the opportunity to expand the business.



4 Residential Growth

One particular focus for the Strategic Land Use Priorities project is undertaking a review of how population growth can be spatially accommodated within the District Council of Grant over a short, medium and long term.

Accommodation of growth, in particular the spatial requirements to house an increased resident population, is the focus of this part of the report.

4.1 Background

The current population in Grant LGA (2021 Census) is 8,636 residents.

As part of the project scope for an Inner Townships Master Plan (prepared by MasterPlan) the District Council of Grant described two potential growth scenarios for an increased population.

- Scenario 1, which seeks to grow the population to 10,000 residents. This equates to an increase of 1,364 residents.
- Scenario 2, which seeks to grow the population to 15,000 residents. This equates to an increase of 6,364 residents.

We consider these scenarios to be logical and appropriate as context for this discussion paper. Scenario 1 represents a population growth outcome which is highly likely to occur in the medium term on the basis of organic population growth rates which have historically been evidenced in the region. Scenario 2 represents a significantly higher population, the attainment of which will either occur in the long to very long term or potentially more rapidly with a significant, sustained uptake in growth rates.

Over 95 per cent of dwellings in the District Council of Grant are separate houses, and average household size has remained consistent (with a slight decrease) over the last ten years (2.7 persons per dwelling in 2011, 2.6 persons per dwelling in 2021). It is therefore assumed that the majority of new dwellings that will be built will be separate houses, with an average household size of 2.5 persons per dwelling. The adoption of a household size which is slightly lower than historical averages accounts for a predicted continued reduction on household size as the population ages.

On the basis of the population growth scenarios, and the forecast average household sizes:

- Achievement of Scenario 1 will require an additional 546 dwellings (1,364 divided by 2.5).
- Achievement of Scenario 2 will require an additional 2,547 dwellings (6,364 divided by 2.5).

In considering sensitivity to changes in average household size, we have considered the difference in the number of dwellings required if the household size moves away from the predicted figure. This is set out in **Table 1** below:



Table 1: Average Household Size Sensitivity

Dwelling Requirement Scenario 2 – 15,000 (Variance from Base Case)	Dwelling Requirement Scenario 1 – 10,000 (Variance from Base Case)	Average Household Size
3,030 (+483)	650 (+104)	2.1 persons
2,767 (+220)	593 (+47)	2.3 persons
2,547 (0)	546 (0)	2.5 persons (Base Case)
2,357 (-190)	505 (-41)	2.7 persons
2,194 (-353)	470 (-76)	2.9 persons

As can be seen from the figures in **Table 1** the average household size will need to change significantly before there is a significant change in the number of dwellings required to house the population under either of the growth scenarios.

Average household sizes across Australia are decreasing as the population ages, and District Council of Grant is following this trend, albeit to a lesser extent. The selection of 2.5 persons per dwelling, which is a slight decrease from the 2021 Census results for District Council of Grant, reflects this.

The average household size for the Limestone Coast in 2021 was 2.3 persons per dwelling and in Mount Gambier it has remained at 2.3 persons over the last ten years. Should the average household size in District Council of Grant drop to 2.3 the number of additional dwellings required under each scenario would only increase by approximately 9 per cent.

In the unlikely event that average household size decreased significantly in District Council of Grant to 2.1 persons a more significant increase in dwellings (nearly 20 per cent) would be required.

4.2 Allotment Sizes

With the number of dwellings to achieve the growth scenarios having been estimated based on the predicted average household size, consideration needs to be given to the spatial implications of demand for this number of dwellings. The spatial requirements are based on the distribution of allotment sizes (with an allowance for the land requirements for public infrastructure and community facilities).

It is anticipated that a range of allotment sizes will be required to meet future demand for new dwellings in Grant.



Outside of the Neighbourhood Zones at Port MacDonnell and Compton, the current minimum allotment sizes specified in the Code for Rural Living and Township Zones in Grant are most commonly between 1,200 square metres and 10,000 square metres (1.0 hectares) (noting there are a small number of areas where rural living has been developed with average allotment sizes at greater than 1.0 hectares).

The District Council of Grant area is able to provide a more spacious living option, including for those who seek access to employment and services in the City of Mount Gambier, but who do not wish to live in the more traditional suburbs located in the City, which are largely developed in very urban typologies of detached dwellings on medium to large residential sized allotments. The provision of more spacious residential typologies is considered to constitute an important point of difference for residents in District Council of Grant.

Of equal relevance in considering how growth will occur is the need to protect prime agricultural land. For this reason, creation of additional rural living areas with allotments greater than 1.0 hectares is not a recommended outcome.

To cater for future demand residential development at the following average allotment sizes are recommended, spread across various locations:

800 square metres – for growth areas adjoining the City of Mount Gambier and inner townships with CWMS/Sewer availability (Tarpeena and Allendale East), to capitalise on existing infrastructure and which can provide for “suburban” living, although not being at the same density as the Suburban Neighbourhood Zone that is prevalent in the city.

1,300 – 2,000 square metres – provides for housing on larger allotments in a more open rural setting, but without the extent of land requiring ongoing maintenance typical of a larger rural living area. Allotment size is sufficient to provide space for on-site wastewater disposal (or alternatively such allotment sizes can be effectively and economically connected to CWMS/Sewer where infrastructure is available), and for sheds/garages separate to the dwelling. This scale of development equates to the Rural Neighbourhood Zone in the Code, which is not currently applied in the District Council of Grant.

This size has been expressed as a range, noting that Rural Neighbourhood Zoning around South Australia has a broad range of minimum allotment sizes. At the lower end of the range, a 1,300 square metre average allotment size is close to the minimum size which allows for practical siting of a dwelling, ancillary structures, open space, access and on-site wastewater disposal. Development at such an average will typically have a more suburban character than when development occurs at slightly lower densities. Conversely, at an average allotment size of approximately 2,000 square metres, considerable scope exists for a lower density, more open character to be expressed through less solid fencing around allotments, more vegetation and road reserves with swales and flush (or no) kerbing.



3,000 square metres – provides a large lot residential option, with an allotment size not currently available for development in Grant. Allotment size is sufficient to provide space for on-site wastewater disposal, and for large sheds/garages. Recognising the climatic and soil conditions in DC Grant, this option provides for the establishment of significant vegetation surrounding dwellings on allotments, whilst maintaining appropriate asset protection zones. The allotment size is smaller than rural living development, so limits the ability for land use conflict to occur through uses which are non-residential in nature.

5,000 square metres – provides a smaller allotment rural living option, with a mid-range allotment size. Allotment size is sufficient to provide space for on-site wastewater disposal, and for large sheds/garages. Allotments of this size are sufficiently large to allow for minor, non-economic rural activities such as the keeping of highly domesticated farm animals (sheep, goats, horses) and the planting of productive crops (particularly horticulture).

10,000 square metres – provides a larger allotment rural living option, with more spacious living. Allotment size is sufficient to provide space for on-site wastewater disposal, and for large sheds/garages. Allotments of this size are sufficiently large to allow for more substantial, but still non-economic rural activities such as the keeping of highly domesticated farm animals (sheep, goats, horses) and the planting of productive crops (particularly horticulture).

It is anticipated that demand will be highest for the smaller allotments (800 square metres, 1,300 – 2,000 square metres and 3,000 square metres) which are likely to be available closer to Mount Gambier.

There would be a relatively lower level of demand anticipated for the larger allotments (5,000 square metres and 10,000 square metres) due to the extent of land requiring ongoing maintenance and potential distance that such land can be provided from Mount Gambier.

4.3 Overall Land Required Per Allotment

In order to calculate the overall amount of land required for a land division, allowance needs to be made for the provision of public infrastructure, such as roads, open space and drainage. This can be estimated for each allotment size, based on a proportional increase, which proportionally decreases as the allotment size increases.

Table 2 shows the overall land required for the range of allotment sizes recommended for the Grant area.

Table 2: Overall Land Requirement per Allotment

Allotment Size	Proportional Increase for Public Infrastructure	Increase Per Allotment	Overall Land Requirement Per Allotment
800 sqm	35%	280 sqm	1,080 sqm
1,300 – 2,000 sqm	27.5%	357.5 - 550 sqm	1657.5 – 2,550 sqm



Allotment Size	Proportional Increase for Public Infrastructure	Increase Per Allotment	Overall Land Requirement Per Allotment
3,000 sqm	20%	600 sqm	3,600 sqm
5,000 sqm	17.5%	875 sqm	5,875 sqm
10,000 sqm	15%	1,500 sqm	11,500 sqm

The overall figures in the right-hand column of the **Table 2** provide a realistic basis for estimating the aggregate land that will be required to accommodate the level of population growth envisaged by Council.

4.4 Achievement of Scenario 1 - 10,000 Residents

Achievement of Scenario 1 would require an increase of 1,364 residents and 546 dwellings across the District Council of Grant inner townships.

Since 2011 the growth in District Council of Grant has been 783 people, at an average of 78 people per year, which is a 10 per cent increase over ten years.

If the current growth rate continues Scenario 1 would be achieved in approximately 17 years, in 2026. District Council of Grant will have about 9,026 people and in 2031 District Council of Grant will have about 9,416 people.

There is a significant amount of vacant land within District Council of Grant that is already zoned for residential use. This includes:

- Land zoned Rural Living adjacent to Mount Gambier at Compton (Tollner Road).
- Land zoned Rural Living adjacent to Mount Gambier on the Princes Highway.
- Land zoned Neighbourhood at Compton.

Further afield there is vacant land zoned Township and Rural Living at Allendale East and Tarpeena respectively.

Achievement of Scenario 1 would be possible with a growth rate similar to or slightly above the current growth rate and could be achieved using the current supply of vacant land. The range of locations and zoning of the vacant land gives the flexibility to provide the range of allotment sizes described previously, depending on market demand.

Given that the growth in Scenario 1 is anticipated to be achieved in around 12 years' time, at current growth rates, planning for this scenario would not achieve a goal of having identified a 30-year supply of identified land for growth, nor a 15-year supply of suitable zoned land. Therefore, for the purposes of this project, it is considered more beneficial to concentrate the analysis on achievement of Scenario 2, which would require a more significant increase in population.



4.5 Achievement of Scenario 2 - 15,000 Residents

Achievement of Scenario 2 would require an increase of 6,364 residents and 2,547 dwellings across the District Council of Grant.

As stated previously, it is assumed there would be a relatively lower level of demand for the larger allotments (5,000 square metres and 10,000 square metres) than for the three smaller allotment sizes.

Accordingly, as a base model it is estimated the following numbers of the various sizes of allotments will be required to achieve Scenario 2 (numbers of residents accommodated are shown in brackets).

- 5 per cent or 127 dwellings to be provided on 10,000 square metre allotments (317 residents).
- 10 per cent or 255 dwellings to be provided on 5,000 square metre allotments (637 residents).

The remaining 85 per cent of dwellings will be provided equally across the three smaller allotment sizes as follows:

- 28.3 per cent or 722 dwellings to be provided on 3,000 square metre allotments (1,805 residents).
- 28.3 per cent or 722 dwellings to be provided on 1,300 - 2,000 square metre allotments (1,805 residents).
- 28.3 per cent or 722 dwellings to be provided on 800 square metre allotments (1,805 residents).

Using the overall allotment sizes in **Table 2** it is possible to calculate the aggregate land required to achieve Scenario 2, as shown in **Table 3** below.

Table 3: Aggregate Land Required to Achieve Scenario 2 Using a Base Model

Allotment Size	Number Of Dwellings	Overall Land Required Per Allotment	Aggregate Land Required (Hectares)
10,000 sqm	127	11,500 sqm	146.05 ha
5,000 sqm	255	5,875 sqm	149.81 ha
3,000sqm	722	3,600 sqm	259.92 ha
1,300 – 2,000 sqm	722	1,657.5 – 2,550 sqm	119.67 ha – 184.11
800 sqm	722	1,080 sqm	77.98 ha
Total			753.43 – 817.87 ha



The land requirement will increase based on the proportions of the various allotment sizes which are developed. If more smaller allotments and less larger allotments are developed, the aggregate land requirement will be less. If more larger allotments and less smaller allotments are development, the aggregate land requirement will be greater.

To show the sensitivity of land requirements to the allotment size mix, four additional models have been developed, as follows:

- Model 1 - Historical Proportions (Grand Spacious):
 - 20 per cent or 509 dwellings to be provided on 10,000 square metre allotments.
 - 30 per cent or 764 dwellings to be provided on 5,000 square metre allotments.
 - 30 per cent or 764 dwellings to be provided on 3,000 square metre allotments.
 - 20 per cent or 509 dwellings to be provided on 1,300 - 2,000 square metre allotments.
 - 0.0 per cent or nil dwellings to be provided on 800 square metre allotments.
- Model 2 - Highly Spacious:
 - 10 per cent or 255 dwellings to be provided on 10,000 square metre allotments.
 - 25 per cent or 637 dwellings to be provided on 5,000 square metre allotments.
 - 30 per cent or 764 dwellings to be provided on 3,000 square metre allotments.
 - 30 per cent or 764 dwellings to be provided on 1,300 - 2,000 square metre allotments.
 - 5.0 per cent or 127 dwellings to be provided on 800 square metre allotments.
- Model 3 - Base Case:
 - 5.0 per cent or 127 dwellings to be provided on 10,000 square metre allotments.
 - 10 per cent or 255 dwellings to be provided on 5,000 square metre allotments.
 - 28.3 per cent or 722 dwellings to be provided on 3,000 square metre allotments.
 - 28.3 per cent or 722 dwellings to be provided on 1,300 - 2,000 square metre allotments.
 - 28.3 per cent or 722 dwellings to be provided on 800 square metre allotments.
- Model 4 - Compact:
 - 0.0 per cent or nil dwellings to be provided on 10,000 square metre allotments.
 - 5.0 per cent or 127 dwellings to be provided on 5,000 square metre allotments.
 - 25 per cent or 637 dwellings to be provided on 3,000 square metre allotments.
 - 35 per cent or 891 dwellings to be provided on 1,300 - 2,000 square metre allotments.
 - 35 per cent or 891 dwellings to be provided on 800 square metre allotments.
- Model 5 - Highly Compact:
 - 0.0 per cent or nil dwellings to be provided on 10,000 square metre allotments.
 - 5.0 per cent or 127 dwellings to be provided on 5,000 square metre allotments.



- 10 per cent or 255 dwellings to be provided on 3,000 square metre allotments.
- 40 per cent or 1,019 dwellings to be provided on 1,300 - 2,000 square metre allotments.
- 45 per cent or 1,146 dwellings to be provided on 800 square metre allotments.

The land requirements for each of these models are set out in **Table 4** below. These areas assume that the 1,300-2,000 square metre range Rural Neighbourhood Allotments are developed at an average of 2,000 square metres. If the average for allotments of this size is smaller, the aggregate land requirements will be less. The land requirements in the table therefore represent a 'worst case' scenario for aggregate land demand.

Table 4: Aggregate Land Required to Achieve Scenario 2 Using Different Models

Model		Aggregate Land Required (Hectares)
1.	Historical Proportions (Grand Spacious)	1,393.57 ha
2.	Highly Spacious	1,082.84 ha
3.	Base Case	753.43 ha
4.	Compact	547.84 ha
5.	Highly Compact	459.08 ha

4.6 Spatial Analysis Methodology

Considering the land requirements that would be required to achieve Scenario 2, a spatial analysis exercise has been undertaken to determine how growth of the existing zoned areas and other locational options would provide for residential growth over time. The approach used does not seek to achieve Scenario 2, which was focused on the inner townships, rather it seeks to identify the potential growth that could be achieved throughout the Grant Local Government Area (LGA), in the context of the extent of land required. The following analysis has in fact identified potential growth far in excess of Scenario 2.

The approach to the spatial analysis has been as follows:

1. Review the existing patterns of development in townships, rural living settlements and other areas where residential development is concentrated.
2. Develop a series of Land Development Opportunity Areas ('LDOAs') in and around each township and settlement.
3. For each township and settlement consider options for future development with a suitable level of conservatism applied (to ensure that future development densities modelled are not unrealistically high).
4. Refine the LDOAs based on the options for future development.



5. Calculate allotment yields and population for each LDOA based on the models calculated in Number 2.

The process of developing the LDOAs emphasizes a hierarchy of regulatory positioning as follows:

1. A preference for land which is already zoned with an appropriate zone (for example residential development in a Neighbourhood Zone) - except where there is clear evidence to suggest that the existing zoning is materially sub-optimal or the land either cannot be feasibly developed or will not be released for development.
2. Subsequently, a preference for land which is already zoned for some form of residential development and upzoning is possible - for example land in the Rural Living Zone which could be developed at Rural Neighbourhood or Neighbourhood level densities.
3. Subsequently, a preference for land which forms a contiguous extension of land which is already zoned for some form of residential development - meaning land adjacent an existing Neighbourhood or Rural Living Zone.
4. Finally, land which does not meet any of the above three criteria.

4.7 Key Growth Locations

Following review of all township options within the District Council of Grant, including careful review and evaluation of previous studies, most particular the Rural Living and Township Zones Boundaries Review and Master Plan, the following key township priorities have been modelled on the basis of their capacity to accept more significant levels of growth over the short, medium and longer term.

- Allendale East.
- Yahl.
- Tarpeena.
- Kongorong.
- Compton.

Coastal and River Townships reviewed in the Rural Living and Township Zones Boundaries Review and Master Plan have also been reviewed, and their growth opportunities are included on the basis of the modelled figures from the previous studies. These townships include:

- Blackfellows Caves.
- Cape Douglas.
- Carpenter Rocks.
- Donovans.
- Nene Valley.
- Pelican Point.
- Racecourse Bay.
- Eight Mile Creek to Crown Bay.



Port MacDonnell has also been reviewed, however, growth opportunities are limited to a small number of undeveloped sites already zoned for residential development.

In respect of Rural Living land, further consideration has been given to both infill, and some logical extensions of existing Rural Living areas.

Rural Living has been a popular residential typology in the District Council of Grant over an extended period, and this form of development contributes substantially to the character and understanding of the community and provides a distinct separation from the more urban forms of development which predominate in the City of Mount Gambier.

The recent position of the State Government in respect of Rural Living development is noted, however, it is considered that a more nuanced approach is required in the District Council of Grant for a number of reasons, including:

- High rainfall and good soils make the establishment of extensive vegetation on large lot residential and rural living development achievable.
- Low levels of land use conflict have been evident in large lot residential and rural living areas over an extended period of time.
- Areas of land occupied by large lot residential and rural living development remain very small when compared to the Council area as a whole.
- Market demand for such residential typologies remains strong.
- Additional large lot residential and rural living areas can be located such that they are separated from the City of Mount Gambier and future growth areas surrounding it.

It is also important to recognise a clear distinction between large lot residential development and rural living development. Whilst these have not necessarily been well defined in South Australian planning practice, Rural Living should refer to allotments of a minimum of 1.0 hectare and extending up to around 5.0 - 10.0 hectares in area (depending on climate and soil conditions). Rural Living implies no economic primary production uses, such as the keeping of stock (including horses and cattle), the use of large commercial vehicles and equipment, the application of agricultural practices, including sowing, reaping and the application of herbicides and pesticides, although such activities may still occur on some allotments on a principally non-economic/'hobby farm' basis.

Large lot residential, conversely, provides for far less emphasis on primary production activities, and involves allotments of size in the range of 2,000 - 3,000 square metres up to around 1.0 hectare. It is larger than Rural Neighbourhood type land, but sits at a smaller size than most rural living development. Large lot residential will be focused on large dwellings, and large outbuildings, the storage of vehicles and chattels for personal purposes (including caravans, boats, large utes/small trucks, and small farm/civil equipment. Large lot residential has a focus on landscape, which can range from the establishment of manicured gardens (particularly common in District Council of Grant) to the restoration/rewilding of formerly poor-quality land (often marginal retired farmland).



Managed well, large lot residential offers opportunities to establish distinct, high quality residential areas, which benefit from high landscape value and visual amenity. In achieving such an outcome, good environmental outcomes can also be achieved, particularly through the establishment of large amount of vegetation in both the public and private realms.

The current parameters/zone provisions under the Planning and Design Code create overlap between the Suburban Neighbourhood Zone and Township Zone (as urban zones), the Rural Neighbourhood Zone and the Rural Living Zone. The choice of zone in a particular location should ideally focus on the desired outcomes in respect of average allotment size, dwelling and allotment typologies, land uses and character. The Planning and Design Code offers the potential for Technical and Numeric Variations to cater for different allotment sizes in the same zone across the Council area.

4.8 Summary of Spatial Outcomes

The population growth opportunities are modelled and summarised in aggregate form in **Table 5** below.

In total the growth opportunities that have been modelled have the potential to provide up to approximately 5,825 new allotments which would allow for a population increase of around 14,557 people.

Three separate options have been modelled for Compton which factor in differing levels of infrastructure provision, and so a range of potential allotment and population growth is shown for that location in **Table 5** - see Sections 4.8.5 and 4.9.1 for detail. The extent of growth at Compton will in turn influence the overall total amount of population growth for the Council area.

For reference, the maximum potential growth exceeds the targets required to achieve Scenario 2 (increase of 6,364 residents and 2,547 dwellings) by approximately 230 per cent.



Table 5: Population Growth Summary

Town	Additional Allotments	Population Increase
Yahl	498 lots	1,246 persons
Allendale East	821 lots	2,053 persons
Tarpeena	837 lots	2,092 persons
Kongorong	93 lots	233 persons
Compton	740 - 2,472 lots	1,848 - 6,176 persons
River and Coastal Communities	505 lots	1,262 persons
Port MacDonnell	239 lots	597 persons
Worrolong Rural Living	128 lots	319 persons
Suttontown A Rural Living	52 lots	130 persons
Suttontown B Rural Living	81 lots	202 persons
Compton A Rural Living	20 lots	50 persons
Mil Lel B Rural Living	79 lots	197 persons
Total	4,093 - 5,825 lots	10,233 - 14,557 people



4.8.1 Allendale East

Allendale East provides a number of opportunities for residential growth. CWMS is available and has the potential for augmentation to cater for future development.

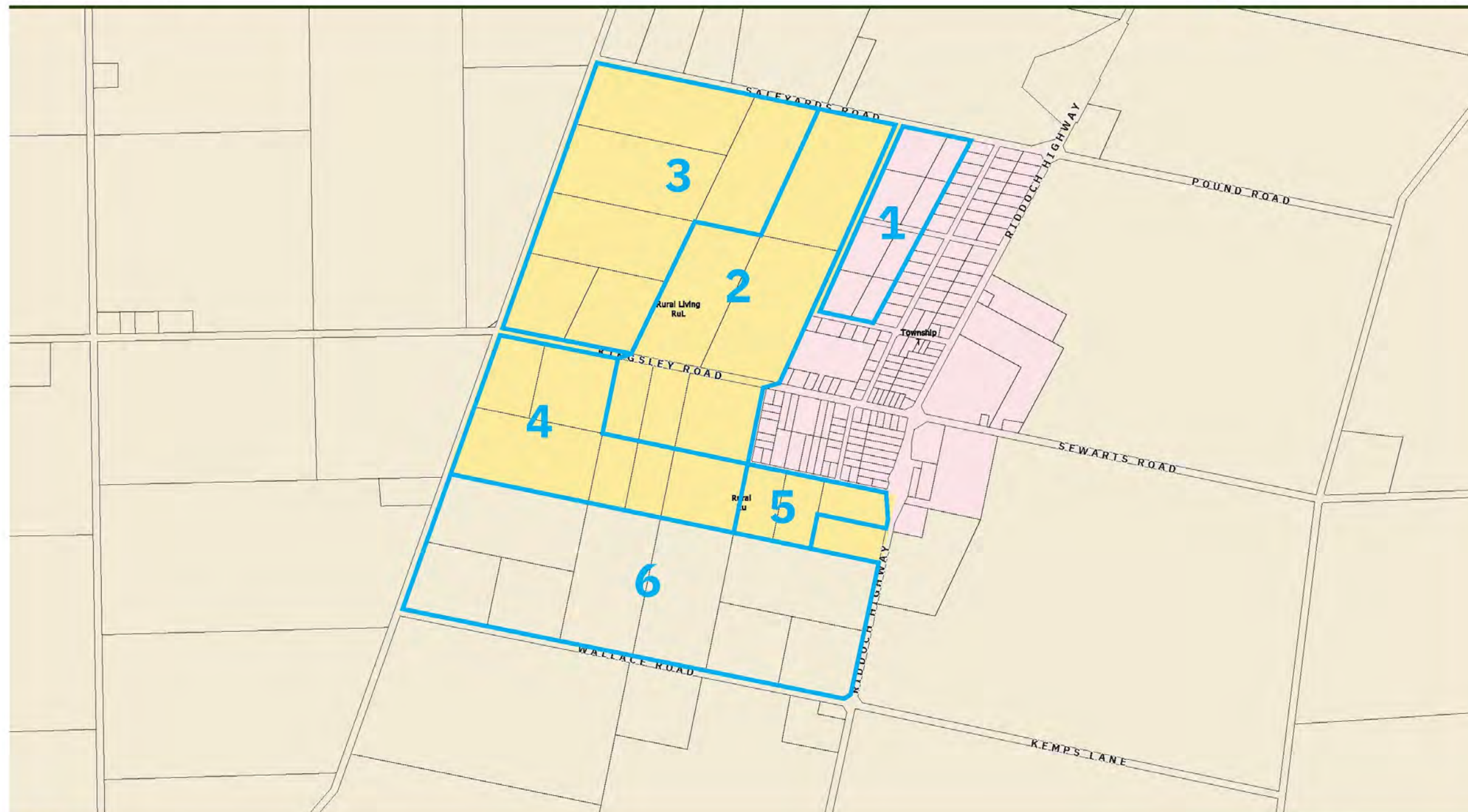
New allotments centrally located closer to Riddoch Highway should be 800 square metres in area, and allotments further out should be 1,300 square metres in area. Area 6 is not included at this stage and is proposed to be considered for rezoning to Deferred Urban.

LDOAs in Allendale East are shown in **Figure 2** below.

A breakdown of the yield of LDOAs in Allendale East is shown in **Table 6** below.

Table 6: Allendale East LDOAs

Location at Allendale East	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	91,400sqm	1,080sqm	85 lots	2.5 people	213 people
Area 2	419,000sqm	1,080sqm	388 lots	2.5 people	970 people
Area 3	268,500sqm	1,657.5sqm	162 lots	2.5 people	405 people
Area 4	218,900sqm	1,657.5sqm	132 lots	2.5 people	330 people
Area 5	58,100sqm	1,080sqm	54 lots	2.5 people	135 people
Total	1,055,900sqm		821 lots		2,053 people



1	9.14 ha
2	41.90 ha (excludes Kingsley Road)
3	26.85 ha
4	21.89 ha
5	5.81 ha
6	46.61 ha

AREAS

Allendale East

Figure 2: LDOAs in Allendale East



4.8.2 Yahl

Yahl provides a number of opportunities for future residential growth. No CWMS is available and land for expansion is mostly zoned Rural Horticulture. Because the land has higher value for primary production, future land for residential development should not be rezoned for larger lot residential or rural living size allotment.

All new allotments should be in the order of 1,300 square metres in area, which is consistent with the majority of allotments currently in the Yahl settlement.

LDOAs in Yahl are shown in **Figure 3** below.

A breakdown of the yield of LDOAs in Yahl is shown in **Table 7** below.

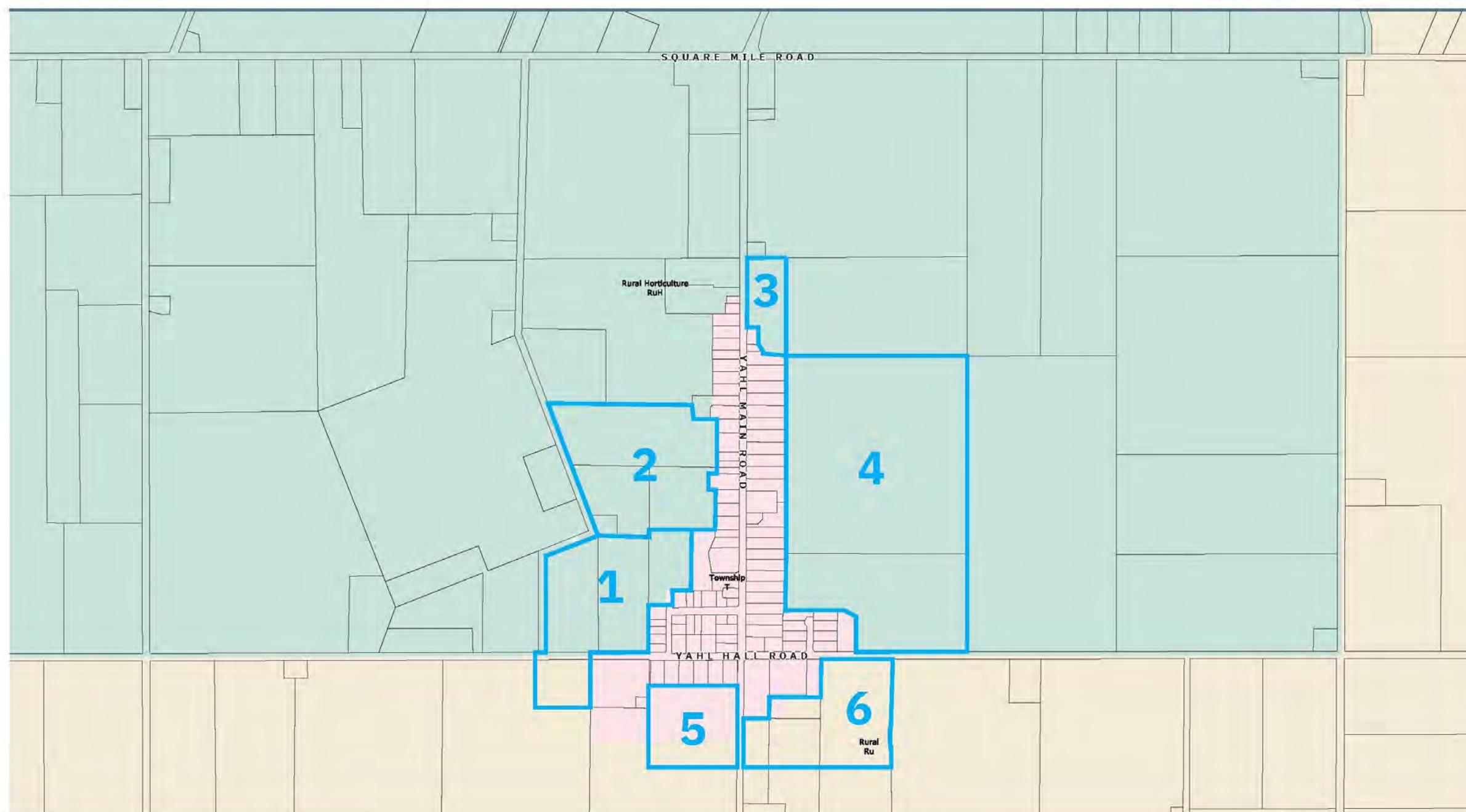
Table 7: Yahl LDOAs.

Location At Yahl	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	131,600sqm	1,657.5sqm	79 lots	2.5 people	198 people
Area 2	133,800sqm	1,657.5sqm	81 lots	2.5 people	203 people
Area 3	25,700sqm	1,657.5sqm	16 lots	2.5 people	40 people
Area 4	378,300sqm	1,657.5sqm	228 lots	2.5 people	570 people
Area 5	59,000sqm	1,657.5sqm	36 lots	2.5 people	90 people
Area 6	96,400sqm	1,657.5sqm	58 lots	2.5 people	145 people
Total	824,800sqm		498 lots		1,246 people



52883 YAH-XA-3D
1:10000 @ A3 / 1:5000 @ A3
0 100 200

MASTERPLAN + **OUTER SPACE**
TOWN + COUNTRY PLANNERS SINCE 1977



1	13.16 ha	4	37.83 ha
2	13.38 ha	5	5.9 ha
3	2.57 ha	6	9.64 ha

AREAS

Yahl A

Figure 3: LDOAs in Yahl



4.8.3 Tarpeena

Tarpeena has significant areas of vacant land that are zoned Township, which provides opportunities for additional residential growth. CWMS is available and has the potential for augmentation to cater for future development.

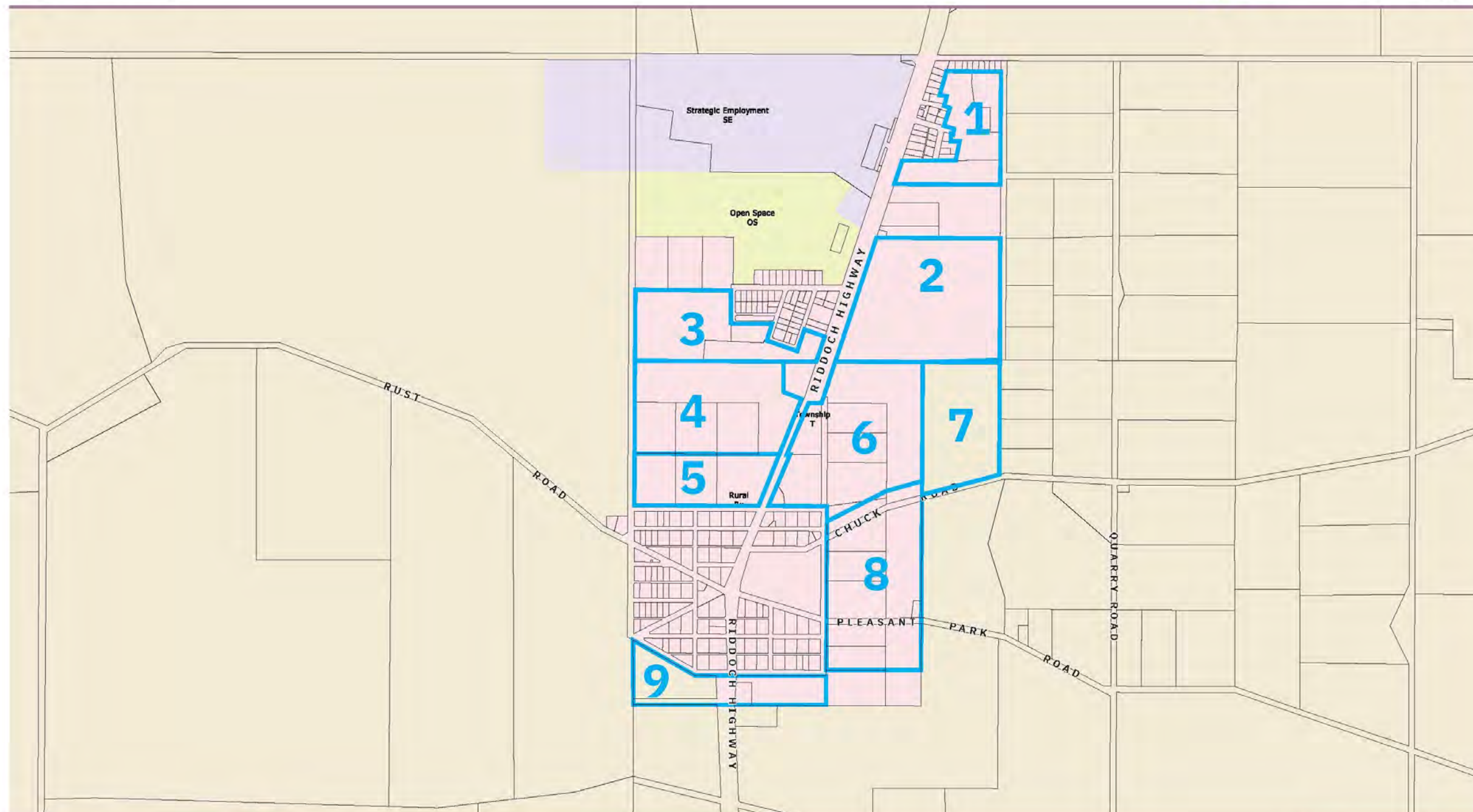
New allotments located closer to the existing developed residential areas close to the Riddoch Highway should be 800 square metres in area, and allotments further from the developed areas should be 1,300 square meters in area.

LDOAs in Tarpeena are shown in **Figure 4** below.

A breakdown of the yield of LDOAs in Tarpeena is shown in **Table 8** below.

Table 8: Tarpeena LDOAs

Location At Tarpeena	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	62,300sqm	1080sqm	58 lots	2.5 people	145 people
Area 2	206,400sqm	1657.5sqm	124 lots	2.5 people	310 people
Area 3	107,500sqm	1080sqm	99 lots	2.5 people	247 people
Area 4	165,400sqm	1657.5sqm	100 lots	2.5 people	250 people
Area 5	80,800sqm	1080sqm	75 lots	2.5 people	188 people
Area 6	112,900sqm	1657.5sqm	68 lots	2.5 people	170 people
Area 7	108,900sqm	1657.5sqm	66 lots	2.5 people	165 people
Area 8	188,900sqm	1080sqm	175 lots	2.5 people	437 people
Area 9	77,900sqm	1080sqm	72 lots	2.5 people	180 people
Total	1,111,000sqm		837 lots		2092 people



1	6.23 ha	6	11.29 ha
2	20.64 ha	7	10.89 ha
3	10.75 ha	8	18.89 ha
4	16.54 ha	9	7.79 ha
5	8.08 ha		

AREAS

Tarpeena

Figure 4: LDOAs in Tarpeena



4.8.4 Kongorong

Kongorong has significant areas of vacant land that are zoned Township, which provides opportunities for additional residential growth. No CWMS is available and the minimum site area under the Code is specified as 1,200 square metres.

All new allotments should be in the order of 1,300 square metres in area, which is consistent with the majority of allotments currently in the settlement.

LDOAs in Kongorong are shown in **Figure 5** below.

A breakdown of the yield of LDOAs in Kongorong is shown in **Table 9** below.

Table 9: Kongorong LDOAS

Location At Kongorong	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	25,400sqm	1,657.5sqm	15 lots	2.5 people	38 people
Area 2	129,500sqm	1,657.5sqm	78 lots	2.5 people	195 people
Total	154,900sqm		93 lots		233 people

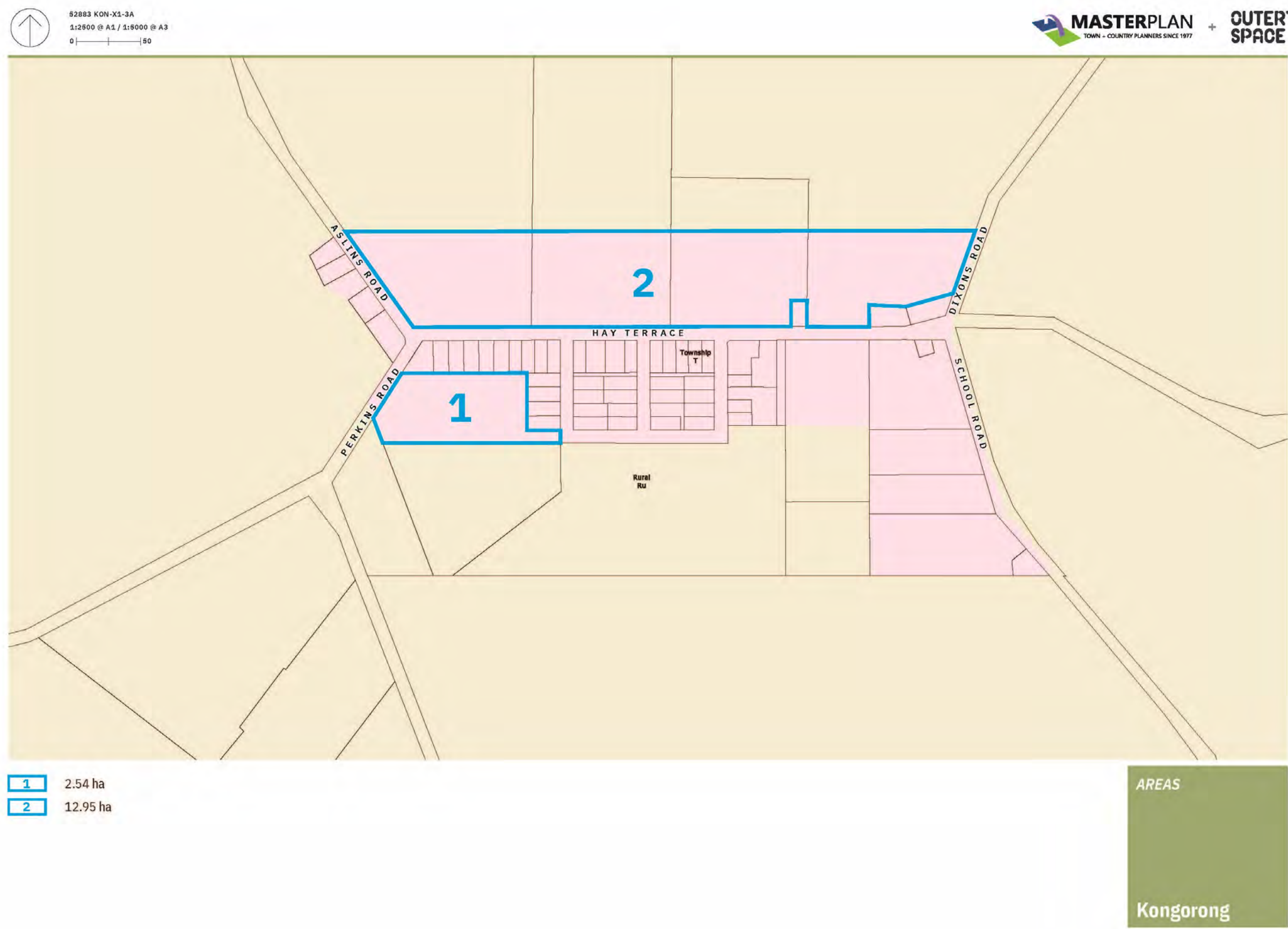


Figure 5: LDOAs in Kongorong



4.8.5 Compton

The Compton area has two significant opportunities that are already zoned for residential development. One area is zoned Neighbourhood (this is the site of the previously proposed Mount Percy Golf Course residential development) and the other is zoned Rural Living (this site is part of a zoned area that extends into the City of Mount Gambier) and has been partially subdivided.

Neither area is well serviced by infrastructure and recent land divisions have created allotments between 3,000 square metres and 5,000 square metres.

LDOAs in Compton are shown in **Figure 6** below.

Three separate options have been considered for Compton:

- A. Potential allotment yield and population growth using 3,000 square metre allotments, based on the current lack of infrastructure in the area (no additional infrastructure).
- B. Potential allotment yield and population growth using an average of 1,800 square metres (achieved via a range of allotment sizes between 1,300 square metres and 3,000 square metres) with infrastructure including reticulated water and wastewater at a minimum.
- C. Potential allotment yield and population growth using 800 square metre allotments, based on infrastructure being significantly upgraded and considering the Minister's recent response to a proposed Code Amendment for part of the area zoned Rural Living (with the area essentially transitioning the area to a suburban area).

In 2022 a Code Amendment was proposed for part of the area zoned Rural Living. The Code Amendment proposed to rezone the land to Neighbourhood Zone with a minimum site area of 1,300 square metres, given the land can be fully serviced with reticulated water, sewer, natural gas, NBN and electricity. Council supported the Code Amendment.

The Minister refused to allow the Code Amendment to proceed – his refusal letter stated:

I note that the subject land forms part of a larger rural living zone in close proximity to the City of Mount Gambier. Whilst I note that the proposal seeks to explore the application of the Neighbourhood Zone, the level of density sought is more akin to that expected in the Rural Living Zone. As it stands, I consider that the proposal does not encourage the orderly expansion of the urban area and am of the view that the future densification should be explored by the District Council of Grant and the City of Mount Gambier as part of the regional planning process currently underway.

A breakdown of the yield of LDOAs in Compton for Option A (no additional infrastructure) using 3,000 square metre allotments is shown in **Table 10** below.



Table 10: Compton LDOAs (Option A)

Location At Compton	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	290,700sqm	3,600sqm	81 lots	2.5 people	202 people
Area 2	142,000sqm	3,600sqm	39 lots	2.5 people	98 people
Area 3	144,300sqm	3,600sqm	40 lots	2.5 people	100 people
Area 4	334,200sqm	3,600sqm	93 lots	2.5 people	233 people
Area 5	224,400sqm	3,600sqm	62 lots	2.5 people	155 people
Area 6	282,600sqm	3,600sqm	78 lots	2.5 people	195 people
Area 7	145,300sqm	3,600sqm	40 lots	2.5 people	100 people
Area 8	249,500sqm	3,600sqm	69 lots	2.5 people	172 people
Area 9	268,700sqm	3,600sqm	75 lots	2.5 people	187 people
Area 10	173,700sqm	3,600sqm	48 lots	2.5 people	120 people
Area 11	61,400sqm	3,600sqm	17 lots	2.5 people	42 people
Area 12	97,800sqm	3,600sqm	27 lots	2.5 people	67 people
Area 13	256,100sqm	3,600sqm	71 lots	2.5 people	177 people
Total	2,670,700sqm		740 lots		1,848 people

A breakdown of the yield of the LDOAs in Compton for Option B (infrastructure upgraded, Rural Neighbourhood sized allotments) using an average of 1,800 square metre allotments is shown in **Table 11** below.

Table 11: Compton LDOAs (Option B)

Location At Compton	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	290,700sqm	2,295sqm	127 lots	2.5 people	318 people
Area 2	142,000sqm	2,295sqm	62 lots	2.5 people	155 people
Area 3	144,300sqm	2,295sqm	63 lots	2.5 people	158 people
Area 4	334,200sqm	2,295sqm	146 lots	2.5 people	365 people



Location At Compton	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 5	224,400sqm	2,295sqm	98 lots	2.5 people	245 people
Area 6	282,600sqm	2,295sqm	123 lots	2.5 people	308 people
Area 7	145,300sqm	2,295sqm	63 lots	2.5 people	158 people
Area 8	249,500sqm	2,295sqm	109 lots	2.5 people	273 people
Area 9	268,700sqm	2,295sqm	117 lots	2.5 people	293 people
Area 10	173,700sqm	2,295sqm	76 lots	2.5 people	190 people
Area 11	61,400sqm	2,295sqm	27 lots	2.5 people	68 people
Area 12	97,800sqm	2,295sqm	43 lots	2.5 people	108 people
Area 13	256,100sqm	2,295sqm	112 lots	2.5 people	280 people
Total	2,670,700sqm		1,166 lots		2,919 people

A breakdown of the yield of LDOAs in Compton for Option C (infrastructure upgraded, suburban transition) using 800 square metre allotments is shown in Table 12 below.

Table 12: Compton LDOAs (Option C)

Location At Compton	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	290,700sqm	1,080sqm	269 lots	2.5 people	672 people
Area 2	142,000sqm	1,080sqm	131 lots	2.5 people	327 people
Area 3	144,300sqm	1,080sqm	134 lots	2.5 people	335 people
Area 4	334,200sqm	1,080sqm	309 lots	2.5 people	772 people
Area 5	224,400sqm	1,080sqm	208 lots	2.5 people	520 people
Area 6	282,600sqm	1,080sqm	262 lots	2.5 people	655 people
Area 7	145,300sqm	1,080sqm	134 lots	2.5 people	335 people
Area 8	249,500sqm	1,080sqm	231 lots	2.5 people	577 people
Area 9	268,700sqm	1,080sqm	249 lots	2.5 people	622 people
Area 10	173,700sqm	1,080sqm	161 lots	2.5 people	402 people
Area 11	61,400sqm	1,080sqm	57 lots	2.5 people	142 people



Location At Compton	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 12	97,800sqm	1,080sqm	90 lots	2.5 people	225 people
Area 13	256,100sqm	1,080sqm	237 lots	2.5 people	592 people
Total	2,670,700sqm		2,472 lots		6,176 people

There is a significant difference between Options A and C - creation of 800 square metre allotments via provision of infrastructure (Option C) has the potential to significantly increase allotment yield and population growth at Compton (by 1,732 allotments and 4,328 people) above Option A.

On its own Option C has the potential to provide almost all of the population growth envisaged by Scenario 2.

Option B (average 1,800 square metre allotments) represents a "middle ground" between Options A and C. Option B has the potential to increase allotment yield and population growth at Compton above Option A by 426 allotments and 1,071 people. This results in a modest level of population growth resulting from the provision of infrastructure but providing a more spacious living option that more closely reflects the current open character of Compton.

The 1,800 square metres average allotment size has been modelled for Option B following a review of Rural Neighbourhood Zones currently existing in the State, particularly those proximate to urban areas. The most common minimum site area applied is 2,000 square metres, at locations close to towns such as Murray Bridge, Port Augusta, Millicent, Remark, Berri, Loxton, Stirling and Aldgate. When allowance is made for the provision of public infrastructure, such as roads, open space and drainage, the overall land required under Option B is calculated at a rate of 2,295 square metres per allotment.

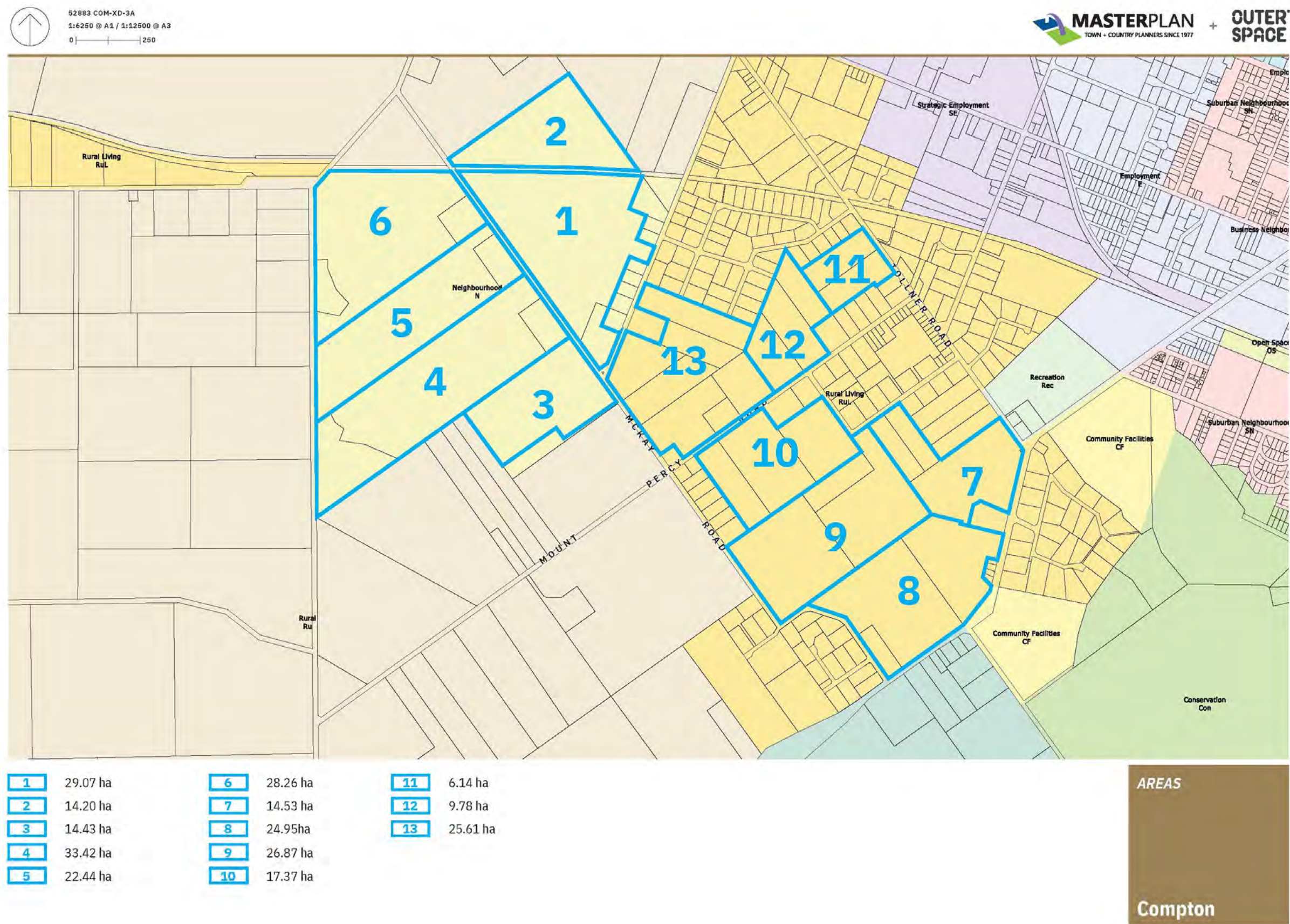


Figure 6: LDOAs in Compton



4.8.6 River and Coastal Communities

In the Rural Living and Township Zones Boundaries Review and Master Plan project, the following river and coastal communities were evaluated, and township growth opportunities identified:

- Blackfellows Caves - Approximately 120 additional allotments.
- Cape Douglas - No useful supply of additional allotments or opportunity to expand identified.
- Carpenter Rocks - Approximately 70 additional allotments.
- Donovans - Approximately 85 additional allotments.
- Nene Valley - Approximately 10 additional allotments.
- Pelican Point - Approximately 200 additional allotments.
- Racecourse Bay - Approximately 20 additional allotments.
- Eight Mile Creek to Brown Bay - No useful supply of additional allotments or opportunity to expand identified.

In aggregate this is a potential additional supply of approximately 505 allotments, which applying the average household size assumed would accommodate approximately an additional 1,262 persons.

4.8.7 Port MacDonnell

As described in the Port MacDonnell Urban Design Framework, coastal flooding mapping produced by the Department for Environment and Water (DEW) shows that the majority of the land surrounding the township is low-lying and subject to inundation. This limits the ability of the township to expand. Consequently, only growth areas on land already zoned for residential development (Neighbourhood Zone and Rural Neighbourhood Zone) have been considered.

There is opportunity for in-fill development throughout the township - potential yield and population growth can only be estimated with a significant level of detailed analysis.

LDOAs in Port MacDonnell are shown in **Figure 7** below.

A breakdown of the yield of LDOAs in Port MacDonnell is shown in **Table 13** below.

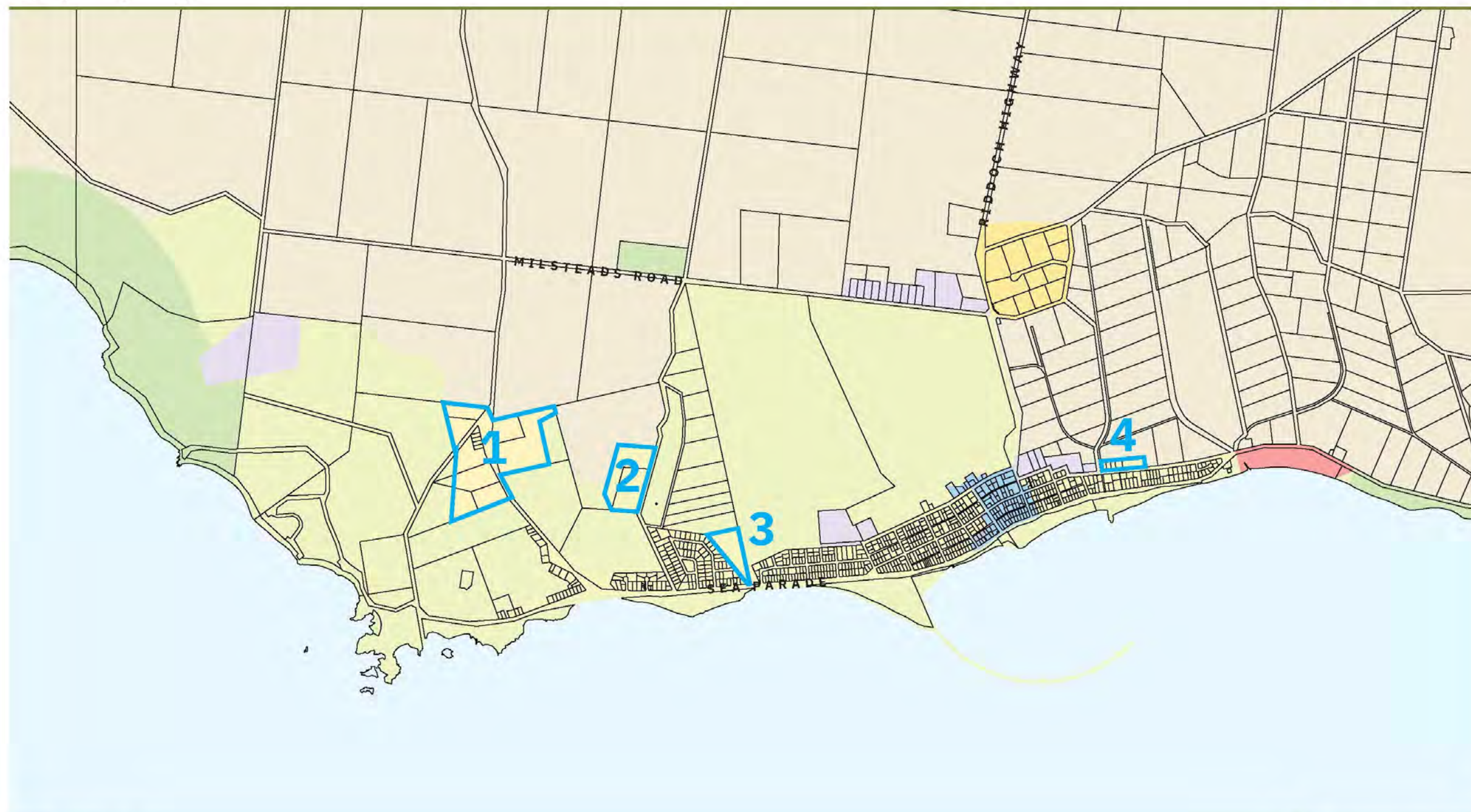
Table 13: Port MacDonnell LDOAs

Location At Port Macdonnell	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	229,800sqm	1657.5sqm	138 lots	2.5 people	345 people
Area 2	69,500sqm	1080sqm	64 lots	2.5 people	160 people
Area 3	28,300sqm	1080sqm	26 lots	2.5 people	65 people
Area 4	12,400sqm	1080sqm	11 lots	2.5 people	27 people
Total	340,000sqm		239 lots		597 people



53133 POR-XC-3A
1:3000 @ A3 / 1:1500 @ A1
0 100

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TOWN + COUNTRY PLANNERS SINCE 1977



1	22.98 ha
2	6.95 ha
3	2.83 ha
4	1.24 ha

RESIDENTIAL LAND
DEVELOPMENT
OPPORTUNITY AREAS

DISTRICT COUNCIL OF GRANT
STRATEGIC LAND USE PRIORITIES PROJECT

PORT
MACDONNELL

Figure 7: LDOAs in Port MacDonnell



4.8.8 Worrolong Rural Living Area

Expansion of this area to the east was proposed as part of the Rural Living and Township Zone Boundaries Review and Master Plan. Land to the south has also been considered as an expansion to the zone, to further provide rural living opportunities at this location.

LDOAs in Worrolong are shown in Figure 8 below.

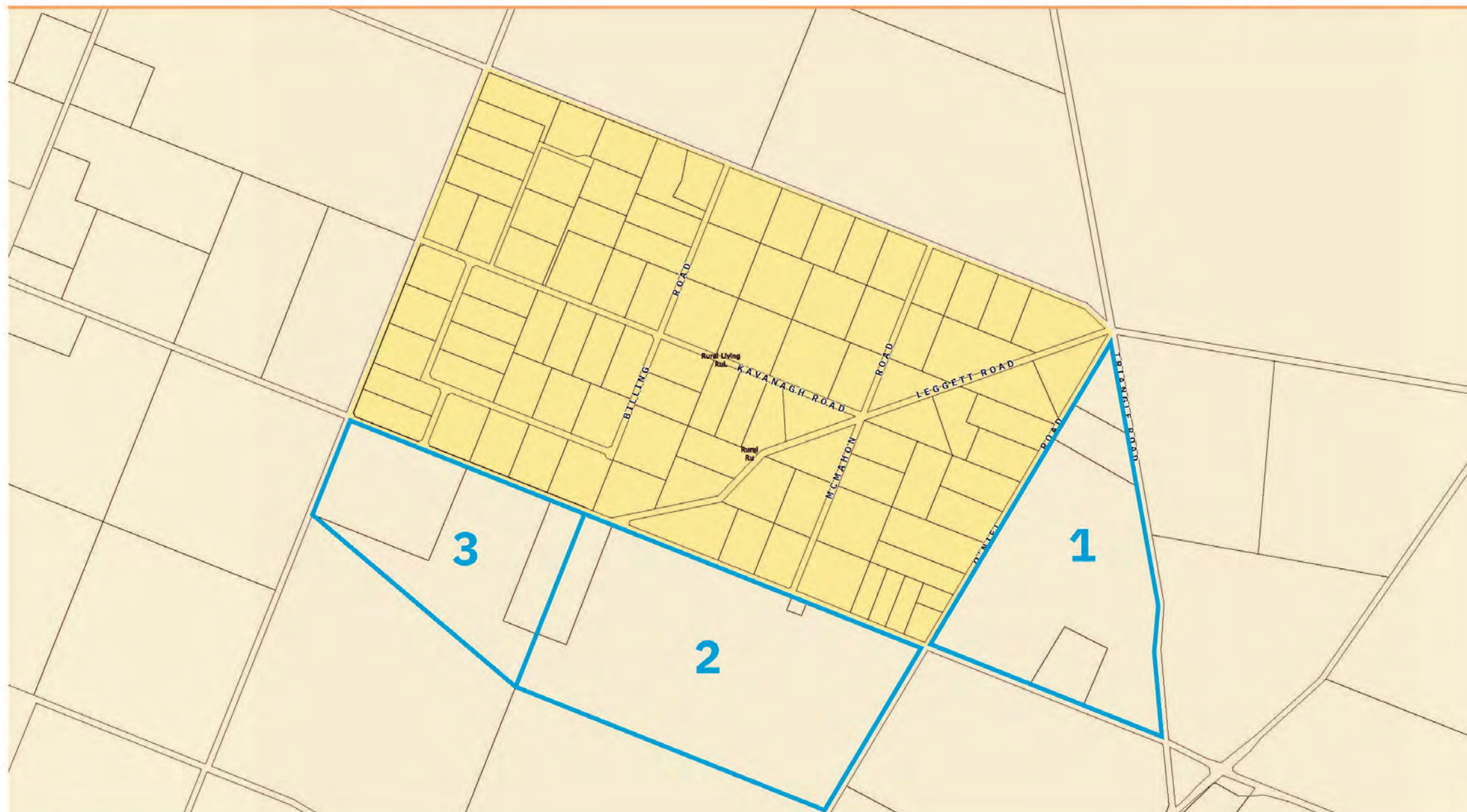
A breakdown of the yield of LDOAs in Worrolong is shown in **Table 14** below.

Table 14: Worrolong LDOAs

Location At Worrolong	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	402,500sqm	11,500sqm	35 lots	2.5 people	87 people
Area 2	618,600sqm	11,500sqm	54 lots	2.5 people	135 people
Area 3	447,200sqm	11,500sqm	39 lots	2.5 people	97 people
Total	1,468,300sqm		128 lots		319 people



52883 WOR-X1-3A



1	40.25 ha
2	61.86 ha
3	44.72 ha

AREAS

Worrolong

Figure 8: LDOAs in Worrolong



4.8.9 Suttontown A Rural Living Area (Princes Highway)

This site provides a significant opportunity for the creation of rural living allotments close to the City of Mount Gambier and is a logical extension of the rural living areas immediately to the north and east.

LDOAs in Suttontown A are shown in Figure 9 below.

A breakdown of the yield of LDOAs in Suttontown A is shown in **Table 15** below.

Table 15: Suttontown A LDOAs.

Location At Suttontown A	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	604,200sqm	11500sqm	52 lots	2.5 people	130 people
Total	604,200sqm		52 lots		130 people

4.8.10 Suttontown B Rural Living Area (Pine Hall Avenue)

This area has development potential given its location directly adjacent to the City of Mount Gambier and access to infrastructure. However expansion of the Strategic Employment Zone along the northern boundary is proposed as part of the Industrial Land Review and Master Plan, and so it is recommended that should further development be supported the future allotment size in this area is limited to 3,000 square metres or above so only a modest increase in density is achievable.

LDOAs in Suttontown B are shown in Figure 10 below.

A breakdown of the yield of LDOAs in Suttontown B is shown in **Table 16** below.

Table 16: Suttontown B LDOAs.

Location At Suttontown B	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	123,200sqm	3600sqm	34 lots	2.5 people	85 people
Area 2	169,600sqm	3600sqm	47 lots	2.5 people	117 people
Total	292,800sqm		81 lots		202 people

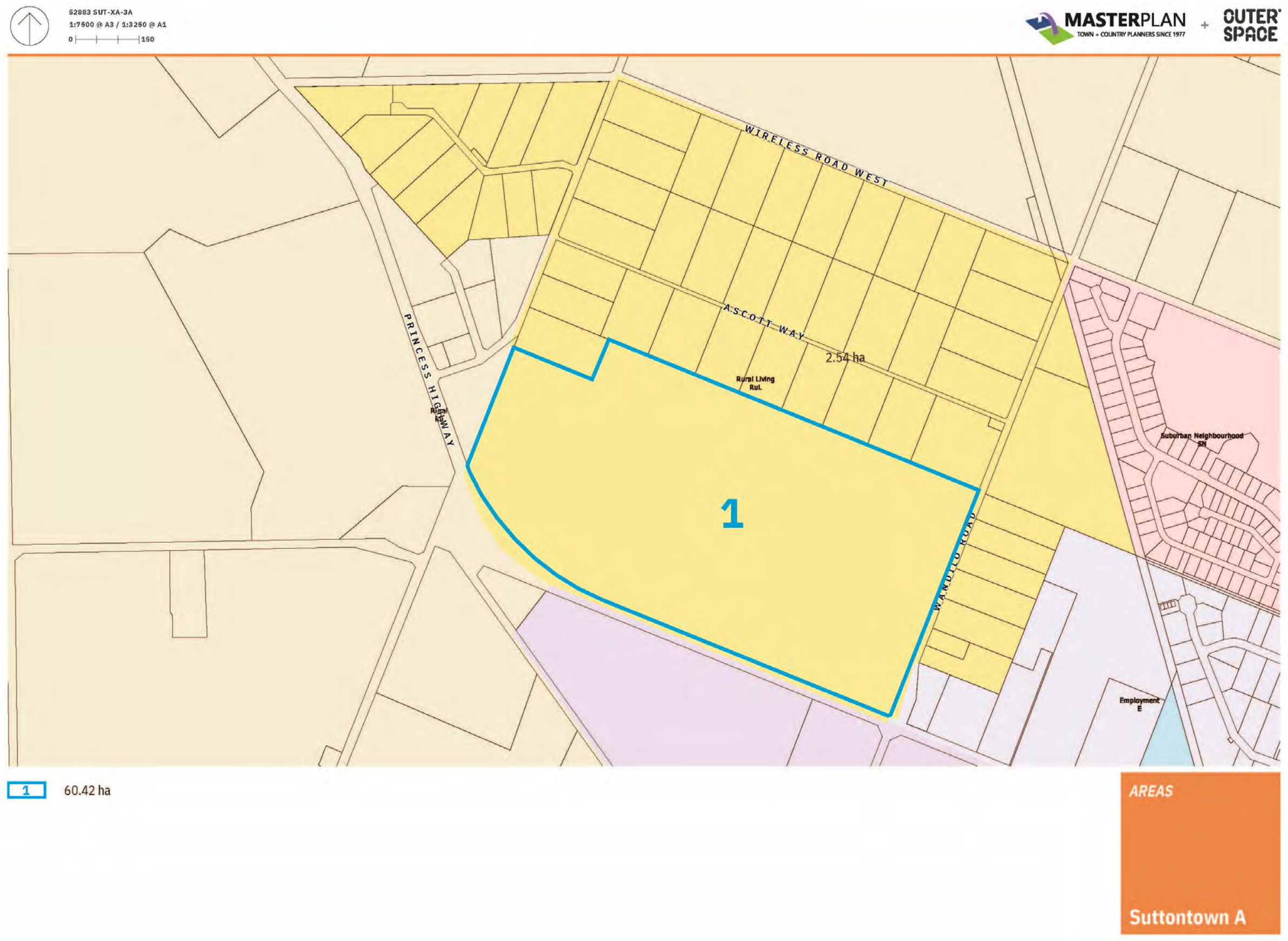
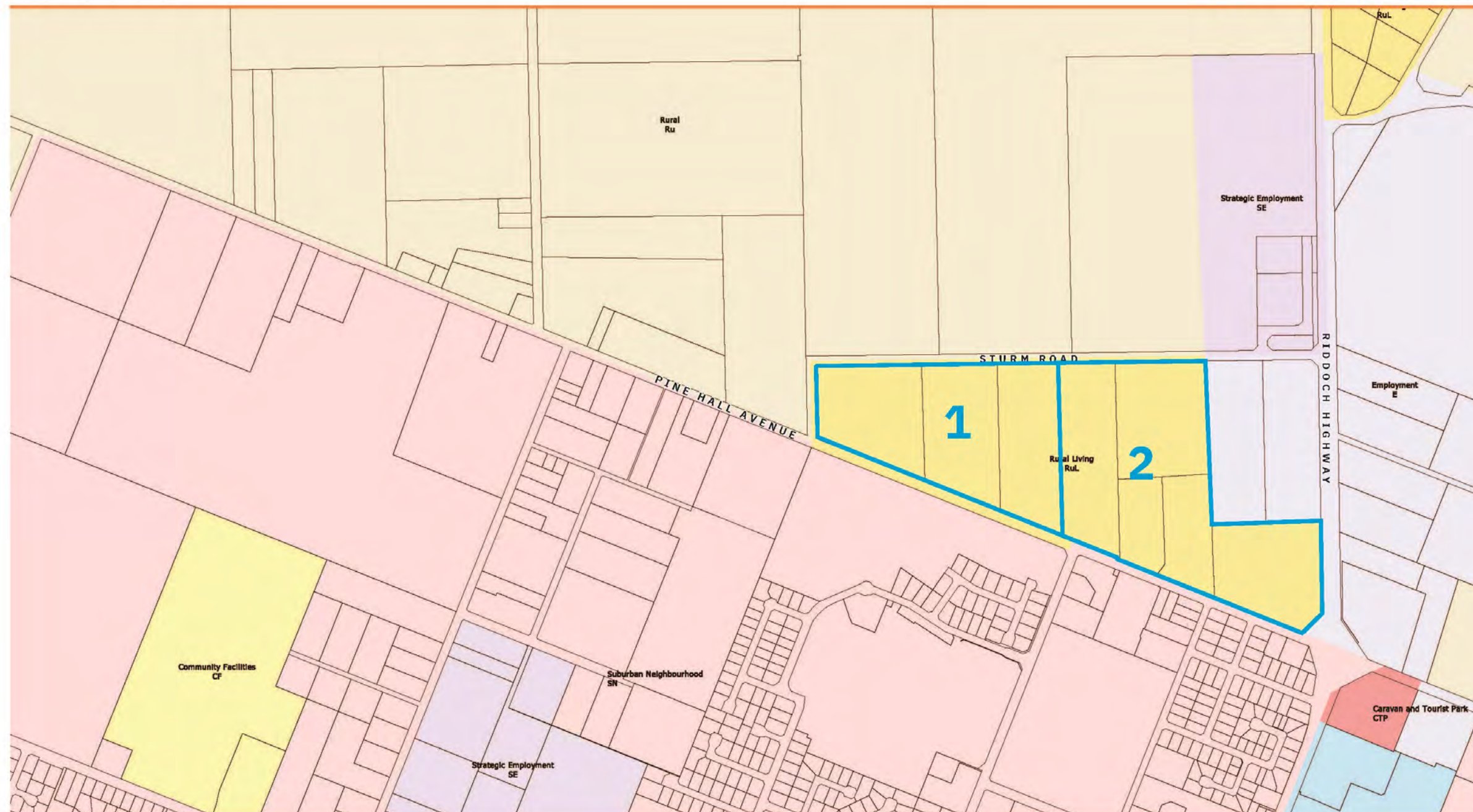


Figure 9: LDOAs in Suttontown A



52883 SUT-XB-3A
1:7500 @ A3 / 1:3250 @ A1
0 150

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TOWN + COUNTRY PLANNERS SINCE 1977



1 12.32 ha
2 16.96 ha

AREAS

Suttontown B

Figure 10: LDOs in Suttontown B



4.8.11 Compton A Rural Living Area (Illman Road)

This area creates an opportunity as a logical extension to the small area already developed for rural living, and the minimum site area of 1.0 hectare specified in the Code should be continued.

LDOAs in Compton A are shown in Figure 11 below.

A breakdown of the yield of LDOAs in Compton A is shown in **Table 17** below.

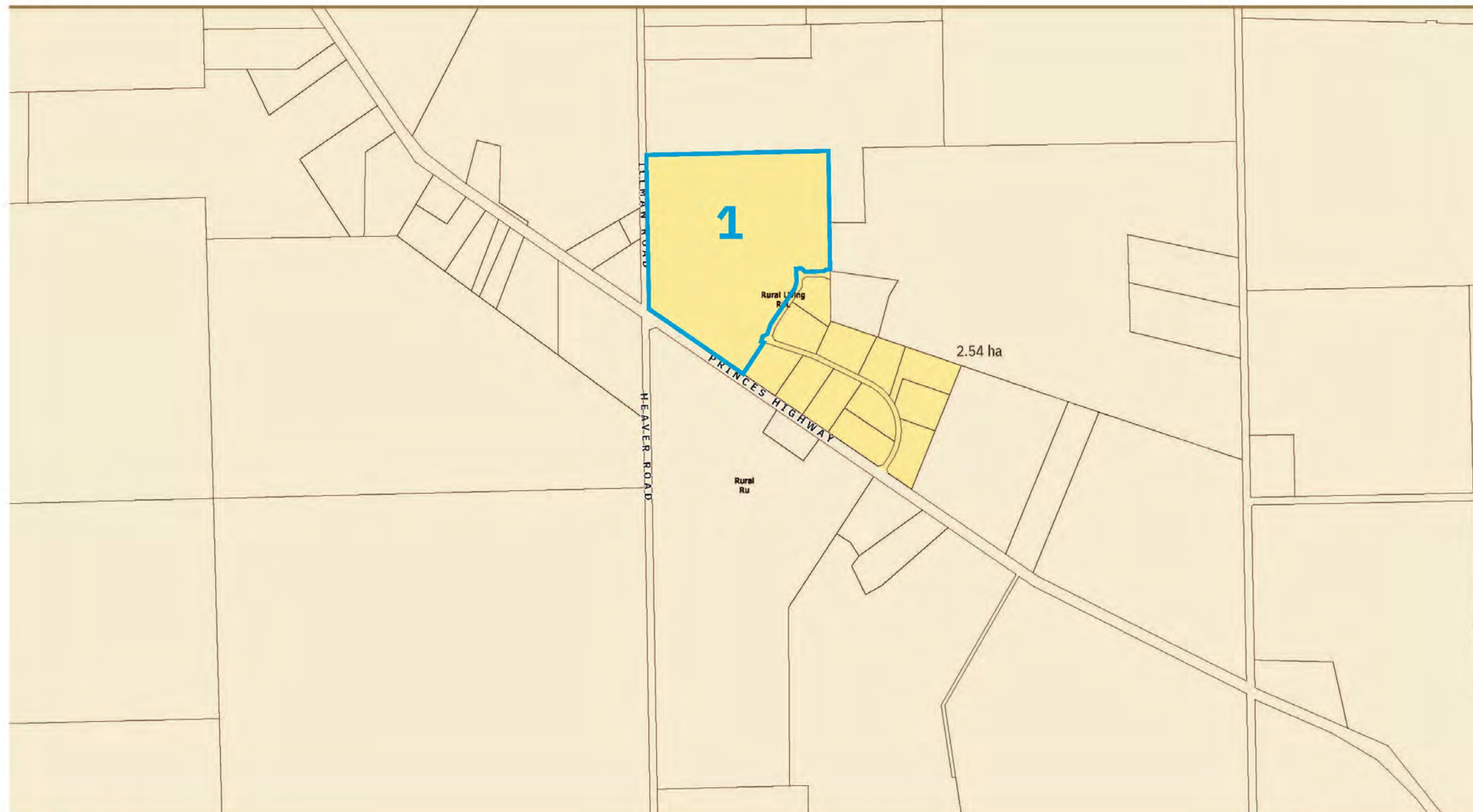
Table 17: Compton A LDOAs

Location At Compton A	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	230,500 sqm	11,500 sqm	20 lots	2.5 people	50 people
Total	230,500 sqm		20 lots		50 people



52883 COM-XA-3A
1:10000 @ A3 / 1:5000 @ A1
0 2000

MASTERPLAN + **OUTER SPACE**
TOWN - COUNTRY PLANNERS SINCE 1977



1 23.05 ha

AREAS

Compton A

Figure 11: LDOAs in Compton A



4.8.12 Mil Lel B Rural Living Area (Sherwin Road)

There is opportunity for this area to be expanded to the north and the east to create additional rural living allotments. Should further development be supported it is recommended that the minimum site area of 1.0 hectares specified in the Code is continued.

LDOAs in Mil Lel B are shown in Figure 12 below.

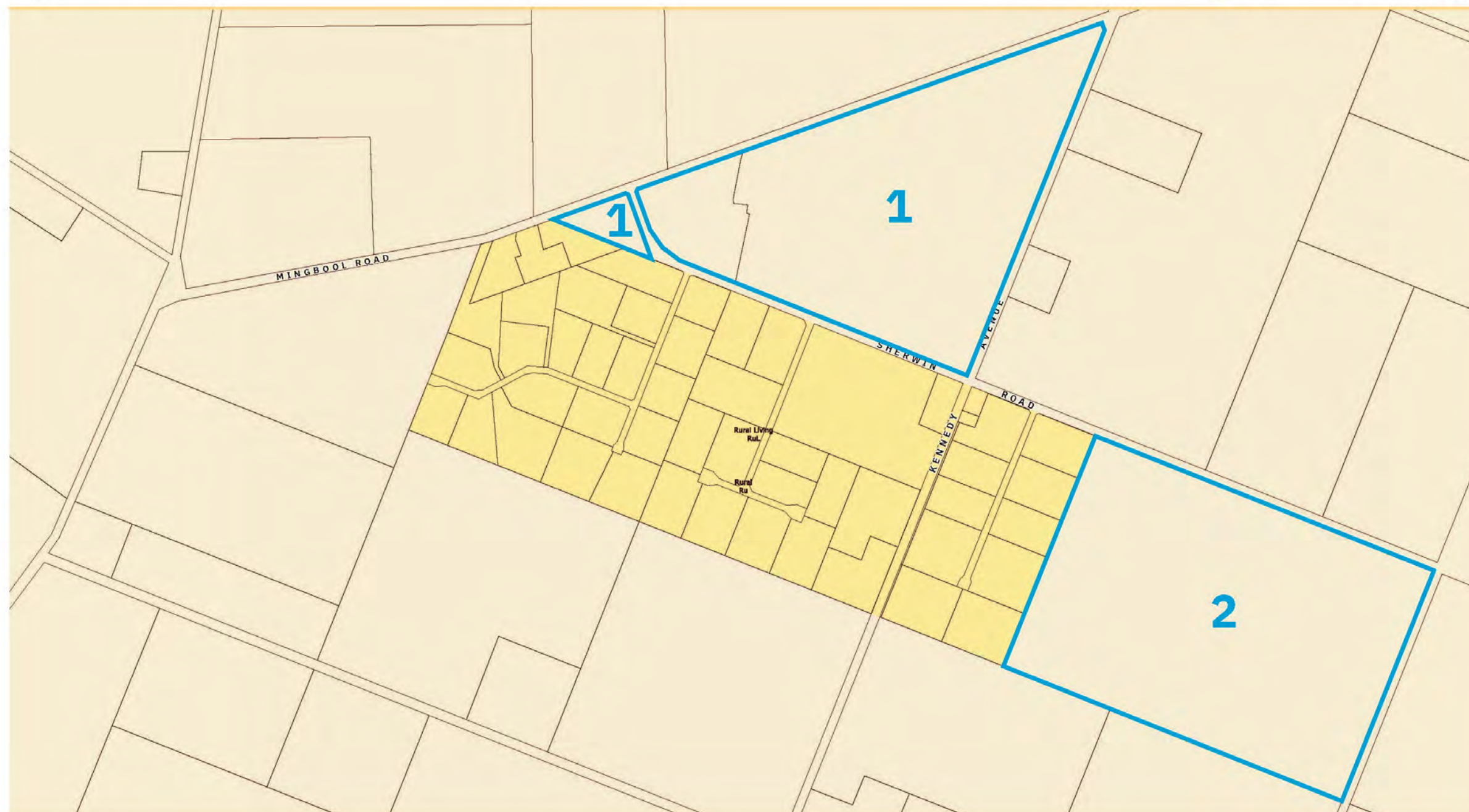
A breakdown of the yield of LDOAs in Mil Lel B is shown in **Table 18** below.

Table 18: Mil Lel B LDOAs

Location At Mil Lel B	Area	Overall Land Required Per Lot	Yield	Average Household Size	Population Increase
Area 1	439,600 sqm	11,500 sqm	38 lots	2.5 people	95 people
Area 2	480,300 sqm	11,500 sqm	41 lots	2.5 people	102 people
Total	919,900 sqm		79 lots		197 people



52883 MIL-XB-3A



1	43.96 ha
2	48.03 ha

AREAS

Mil-Lel B

Figure 12: LDOAs in Mil-Lel B



4.9 Implications

In an overall sense the modelling above demonstrates that a large supply of land for residential growth in the Council area exists. Growth can occur within and immediately adjacent to existing townships (including along the coast and rural living areas).

The range of allotment sizes that have been modelled demonstrates that growth in Grant can occur at densities lower than in the City of Mount Gambier, allowing the existing rural character and point of difference (to the City) to be retained.

This in turn means that no significant loss of primary production land with high capability/suitability should occur as the Council's population grows.

Future high level infrastructure investigation will allow further refinement of the modelling.

To realise a number of the growth opportunities described above, a Code Amendment will be required to make required changes to the Planning and Design Code.

Given the multiplicity of sites and land owners, it is recommended Council or the Minister undertake the key Code Amendments rather than leaving it to individual land owners to pursue separate Code Amendments for their own land. Prior to proceeding Council will need to consult with land owners to gauge their support for having their land rezoned.

Subject to feedback from land owners and the State Government, the key Code Amendments would include the following:

1. Rezone land at Allendale East from Rural Living Zone to Township Zone, and adjust the minimum site area TNV for the Township Zone to 800 square metres.
2. Decrease the minimum site area for the Rural Living Zone at Allendale East to 1,300 square metres.
3. Rezone land at Yahl from Rural Horticulture Zone and Rural Zone to Township Zone.
4. Rezone two small areas at Tarpeena from Rural Zone to Township Zone, and adjust the minimum site area TNV in the Township Zone to 800 square metres or 1,300 square metres depending on location.
5. Rezone land at Worrolong from Rural Zone to Rural Living Zone with a minimum site area TNV of 1.0 hectare.
6. Rezone land at Suttontown B from Rural Living Zone to Rural Neighbourhood Zone with a minimum site area TNV of 3,000 square metres.
7. Rezone land at Mil Lel B from Rural Zone to Rural Living Zone with a minimum site area TNV of 1.0 hectare.

Code Amendments of this scale and complexity generally take approximately 18 months to two years to complete. This includes a formal consultation period of at least six weeks.



No rezoning work is required at Kongorong, coastal and river townships nor Port MacDonnell to facilitate growth at those locations. Potential growth at Compton is discussed below.

4.9.1 Compton

As described previously, the Compton area has two significant opportunities that are already zoned for residential development. One area is zoned Neighbourhood (this is the site of the previously proposed Mount Percy Golf Course residential development) and the other is zoned Rural Living (this site is part of a zoned area that extends into the City of Mount Gambier) and has been partially subdivided.

Neither area is well serviced by infrastructure and recent land divisions have created allotments between 3,000 square metres and 5,000 square metres.

Three options have been considered in the modelling for Compton:

- A. Potential allotment yield and population growth using 3,000 square metre allotments, based on the current lack of infrastructure in the area. This would result in an additional 740 allotments with a population increase of 1,848 people.
- B. Potential allotment yield and population growth using an average of 1,800 square metres (achieved via a range of allotment sizes between 1,300 square metres and 3,000 square metres) with infrastructure including reticulated water and wastewater at a minimum. This would result in an additional 1,166 allotments with a population increase of 2,919 people.
- C. Potential allotment yield and population growth using 800 square metre allotments, based on infrastructure being upgraded and considering the Minister's recent response to a proposed Code Amendment for part of the area zoned Rural Living. This would result in an additional 2,472 allotments with a population increase of 6,176 people.

There is a significant difference between Options A and C - creation of 800 square metre allotments via provision of infrastructure (Option C) has the potential to significantly increase allotment yield and population growth at Compton (by 1,732 allotments and 4,328 people) over and above Option A.

On its own Option C has the potential to provide almost all of the population growth envisaged by Scenario 2.

Option B (average 1,800 square metre allotments) represents a 'middle ground' between Options A and C. Option B has the potential to increase allotment yield and population growth at Compton over and above Option A by 426 allotments and 1,071 people. This results in a modest level of population growth resulting from the provision of additional service infrastructure but providing a more spacious living option that more closely reflects the current open character of Compton.

During the consultation process for the Inner Townships Master Plan, Compton residents expressed a very strong desire to protect the rural character of the area and to continue the traditional rural/rural living patterns of development (allotments larger than 3,000 square metres). They wished to avoid what they saw



as medium to high density residential subdivision, such as was proposed in the Code Amendment (refused in 2022) which proposed 1,300 square metre allotments in part of the area zoned Rural Living.

When refusing the Code Amendment, the Minister indicated that he considered the proposal does not encourage the orderly expansion of the urban area and was of the view that the future densification should be explored by the District Council of Grant and the City of Mount Gambier as part of the regional planning process.

The regional planning process is underway, and it is currently anticipated the Limestone Coast Regional Plan will be on public consultation in late 2024 or early 2025. Council currently has the opportunity to provide input into the initial investigations. Planning and Land Use Services (PLUS) has provided Council staff with mapping and recommendations that consider the growth of the City of Mount Gambier, including the two zoned areas at Compton. The PLUS analysis remains confidential at this stage and

so has not been quoted in this report.

The area zoned Neighbourhood is disjointed from the City of Mount Gambier and is likely

to continue to be subdivided into allotments between 3,000 square metres and 5,000 square metres, given the lack of ability to provide reticulated infrastructure. This would result in a potential yield of

393 allotments with an increase of approximately 983 people. Rezoning this area to Rural Neighbourhood Zone with an average site area of approximately 1,800 square metres would provide a more appropriate policy framework.

Due to its location the area zoned Rural Living is more easily able to be serviced with reticulated water, sewer, natural gas, NBN and electricity. Unless the area is rezoned it is also likely to continue to be subdivided into allotments between 3,000 square metres and 5,000 square metres, resulting in a potential yield of 347 allotments with an increase of approximately 865 people. However, ongoing development of this density would significantly compromise the use of the land in the future to accommodate urban expansion of the City and also compromise the ability for the area to provide a suitable transition from an urban to a rural development pattern.

In addition, the rural living area is within the Blue Lake Zone 1 (Protection) where use of a reticulated sewer may be preferable to the creation of hundreds of additional owner-operated on-site wastewater treatment systems, to protect the quality of water entering the Blue Lake. A density of development greater than rural living would be required to make an upgrade to the sewer system viable.

It is noted that Council supported the Code Amendment (refused in 2022) which proposed 1,300 square metre allotments, indicating support for a density greater than envisaged by the current Rural Living zoning at that time.

In keeping with the Minister's views, the future growth of the City is an issue to be considered more broadly as part of the regional planning process in conjunction with the City Council. It is recommended that



Council continue to engage with the City of Mount Gambier to discuss the potential growth of the City and seek to form a common view on zoning and growth at Compton which can be put forward for inclusion in the draft Limestone Coast Regional Plan.



5 Engagement Outcomes

Council resolved to seek community feedback on the Strategic Land Use Priorities report, with this public feedback used to validate the SLUPP report and define Council's input into the regional planning process. It was also envisaged that this information may assist the community with making informed submissions when engagement on the Limestone Coast Regional Plan is undertaken by the State Planning Commission.

The following documents were prepared by MasterPlan for publication on the Your Say DC Grant community engagement platform over the 3-week consultation period in April 2024:

- The Strategic Land Use Priorities Plan (full report).
- A Strategic Land Use Priorities Plan summary report.
- Strategic Land Use Priorities Plan Online Survey.
- Written submission template (online or via email).

A dedicated project page was created on Your Say DCG (Strategic Land Use Priorities) for the community to read background information on the project, understand what is proposed, how to have your say, the project's timeline, and view the full Draft Strategic Land Use Priorities Project and summary documents.

The Your Say DCG Strategic Land Use Priorities Project page statistics:

- 345 total project page visits.
- 126 downloads of the full draft document.
- 50 downloads of the summary document.
- 98 project page visits were from a link on social media.
- 34 project page visits were from a link in an email.

Promotion of the community consultation occurred between 5 and 29 April 2024. Social media posts and stories were scheduled on Facebook, Instagram and LinkedIn which gained a total of 3,143 views across all three sites and five posts. Details of the consultation were uploaded to Council's main website within the Public Notices section alongside a media release in the Latest News section. This media release was also distributed to local media sources.

A database of approximately 360 community members were emailed the consultation details via the online Your Say DCG newsletter. An additional 170 people received Council's Community Newsletter which contained the Draft Strategic Land Use Priorities Project information. Direct emails were delivered to participants and invitees of Council's Strategic Land Use Priorities Business Engagement Workshop held in May 2023, and individuals who had registered their interest in the project with Council staff members.

Hard copies of the full Draft Strategic Land Use Priorities document, summary document and survey were made available at Council's Principal Office and Port MacDonnell Community Complex. A total of 24 submissions (22 online and 2 paper based) were received during the consultation period with 1 additional late submission).



The feedback received during the community engagement process has been summarised in a 'What We Heard' report which is enclosed at **Attachment 3**.

Overall, the feedback received during the engagement process reflected that which has been received from stakeholders earlier in the project, and from the community more generally during the engagement process associated with the concurrent preparation of the Inner Townships Master Plan.

In respect of Employment Growth respondents were asked to identify from a list, the key challenges that currently hold back the development of industrial land in the Council area. Key challenges ranked (highest to lowest number of responses received), are shown in **Table 19** below:

Table 19: Key Challenges to Development of Industrial Land

Rank	
1	Infrastructure is still undeveloped (i.e. water, sewer, electricity, road network).
2	Access to skilled workers.
2	Lack of housing for workers.
3	Land is in the wrong location (i.e. topography, interface with residential land, lack of access).
3	Limitations on Transport/Freight routes (i.e. Heavy Vehicle routing).

Other challenges identified by respondents can be broadly summarised as follows:

- Upgrade roads along heavy vehicle (B-Double) freight routes to assist businesses in delivering and receiving their products and services more efficiently.
- Improve access to reliable mobile coverage (address gaps in coverage) to improve digital connectivity in the region including for those travelling arterial roads.
- Improve access to fast, reliable and affordable internet services.
- Increasing freight costs undermining competitiveness and ability to scale.
- High prices for regional flights (needs to be more cost-effective to travel by air).
- Lack of affordable and quality housing.

In respect of Residential Growth, respondents were asked to identify from a list, the key challenges that come with increasing resident population in the Council area. Key challenges, ranked (highest to lowest number of responses received), are shown in **Table 20** below:



Table 20: Key Challenges to Residential Growth

Rank	
1	Conflict between residential development and primary production activities (i.e. fragmentation of productive land, interface and cropping activities and/or management of animals).
2	Lack of housing diversity (i.e. dwelling types, allotment sizes).
2	Lack of essential services (i.e. schools, medical services, community services).
3	Housing affordability (both rental and home ownership options).
3	Infrastructure is still undeveloped (i.e. water, sewer, electricity, road network).

Other challenges identified by respondents can be broadly summarised as follows:

- Strategic Land Use Priorities Project report does not set an ambitious target; requires ambitious targets for long-term planning for growth.
- All business needs a population base to sustain and grow with confidence.
- Poor quality builds.
- Fragmentation of productive land.
- Maintain the City-Country feel.
- 5,000 square metres allotments are what is in demand and should be the minimum allotment size in Compton.
- Large allotments (low-density) for residential living is unsustainable.
- Allotments in Compton should be no less than 5,000 square metres.



6 Supplementary Consideration - July 2024

Following preparation of the 'What We Heard' report, a further workshop with Elected Members and the consultant team who have prepared the Strategic Land Use Priorities Project report was held on Thursday 20 June 2024. The purpose of this workshop was to review the community feedback received during the consultation process, and to ask questions and discuss those issues which still required further consideration prior to Council considering the final report for adoption.

The key issues for further consideration included:

1. Compton density and character
2. Lake Terrace East employment lands expansion
3. Yahl expansion

Following the Elected Members Workshop, consideration of these issues was summarised in a memorandum, which was considered by Council at its meeting in July 2024. A copy of the memorandum is enclosed at **Attachment 4**.

The consideration of these three issues from the memorandum is summarised below.

6.1 Compton Density and Character

The future development of land at Compton has been subject of significant review and consideration by Council and interest by stakeholders and the community over a period exceeding a decade. A series of strategic and policy changes over time has resulted in a spatial planning arrangement on the western edge of Mount Gambier which are convoluted and have resulted in the area developing in a piecemeal fashion with limited infrastructure. This presents a significant series of risks for poor planning, development and environmental and social outcomes.

At the present time, a Rural Living Zone with a minimum allotment area Technical and Numeric Variation (TNV) of 5,000 square metres is located at the boundary of the City of Mount Gambier and District Council of Grant. Beyond this is located a Neighbourhood Zone with a minimum allotment size TNV of 450 square metres, before a transition back to a Rural Living Zone along Capiro Road. The land is in the Neighbourhood Zone, with a minimum allotment size TNV of 450 square metres was envisaged to be developed as an integrated Golf Course Estate under the Grant Council Development Plan (now revoked). The Golf Course Estate project however did not progress and the requirement for integrated development around a golf course was lost in the transition from the Grant Council Development Plan to the Planning and Design Code, leaving just a Neighbourhood Zone.

Whilst the need for reticulated water and wastewater infrastructure has limited the ability of land in the Neighbourhood Zone to be developed for residential sized allotments, a number of divisions for allotments in the range of 3,000 to 5,000 square metre have progressed, fragmenting the land and creating the risk of uncoordinated re-subdivision.



The transition from urban forms of development to lower density residential and then rural land on the edge of the city should be clear and structured. The current situation is almost the complete reverse of this and should be corrected as soon as possible to minimise the risk of further undesirable outcomes.

In the correspondence from the Minister for Planning to the proponent of the Moorak Estate Code Amendment (declined), the Minister stated:

I note that the subject land forms part of a larger rural living zone in close proximity to the City of Mount Gambier. Whilst I note that the proposal seeks to explore the application of the Neighbourhood Zone, the level of density sought is more akin to that expected in the Rural Living Zone. As it stands, I consider that the proposal does not encourage the orderly expansion of the urban area and am of the view that the future densification should be explored by the District Council of Grant and the City of Mount Gambier as part of the regional planning process currently underway.

Noting the historic pattern of development in the area, the following is evident. There are:

- A number of undivided strategic allotments (4 hectares or more) remaining as opportunities for future division.
- A broad range of allotment sizes that range in size from as small as 700 square metres, to 3,000 to 5,000 square metres.
- Some larger allotments in the 6,000 - 8,000 square metres.
- A smaller number of allotments in the 1-hectare to 4-hectare range.

In assessing the character of the Compton area in the Rural Living Zone and Neighbourhood Zone, it can be described as a broad, generally open large lot residential area with a mixture of Rural Living, Rural Neighbourhood and a small number of Residential sized allotments. The area is almost exclusively detached dwellings, some of which have significant vegetation, interspersed with more open areas, particularly on the residual allotments greater than 1 hectare in size.

It is observed that the open character is, in a significant part, a function of the land division potential which currently exists not having been fully taken up, with additional yield of in excess of 500 dwellings existing under the current policy (even without assuming urban size allotments in the Neighbourhood Zone). If this available yield under the existing policy was exploited to a greater degree, it is certain that the character of the area would be materially different to the present.

Our assessment of the Minister's reasons for refusal of the Moorak Estate Code Amendment is that the density was insufficiently high, and that the area should be developed at more urban densities. With due respect to the Minister, State Planning Commission and Department, we disagree with such an assessment. The average allotment size proposed by the Moorak Estate Code Amendment was in the order of 2,000 square metres, with a mix of allotment sizes between around 1,400 square metres and 3,000 square metres envisaged. The allotments were to be served with reticulated water and wastewater. We do not consider this to be a level of density 'akin to a Rural Living Zone'.



Feedback from the City of Mount Gambier in respect of this issue indicated a level of support for future residential development which would form an 'edge' to the city, with development occurring in an orderly and coordinated manner. It was suggested that development would be best suited by a form of Residential/Rural Living type allotments that enables a gradual transition from the city to primary production land beyond. The importance of allotments being connected to reticulated water and wastewater was also highlighted.

In the Strategic Land Use Priorities Project report, three scenarios for the growth of Compton were envisaged:

- Option A - 3,000 square metre average allotments - representing approximately the average of recent development proposals in the area.
- Option B - 1,800 - 2,000 square metre average allotments - representing approximately the outcome proposed in the Moorak Estate Code Amendment.
- Option C - 800 square metre allotments - representing an urban outcome within a neighbourhood zone.

A SWOT analysis has been undertaken for each option and is presented in the following tables.

Table 21: SWOT Analysis - Option A

Strengths • Minimal policy change from current position • Least change to existing character (but will still be material) • Feedback suggests Option A is supported by the City of Mount Gambier	Weaknesses • Uncoordinated land divisions occur over time • Inappropriately small divisions in former Golf Course Estate Neighbourhood Zone • Proliferation of on-site wastewater disposal with hundreds of additional systems • Correspondence from the Minister for Planning to the proponent of the Moorak Estate Code Amendment (declined) suggests that the Minister seeks greater density residential development as an expansion to the urban area of City of Mount Gambier
Opportunities • Limited calls on Council provision of infrastructure in short term	Threats • Lack of coordination • Potential impact on groundwater resources • Future pressure for policy change likely to endure



Table 22: SWOT Analysis - Option B

Strengths - Clear policy change pathway to align whole of Compton in single Rural Neighbourhood Zone - Provides for moderate level of population growth - Balances character with infrastructure provision opportunity	- Weaknesses - Not supported by a group of existing residents
Opportunities - Provides opportunity for infrastructure serviced land division to be developed by private sector - Coordinated development maximises ability to manage character to controls on public realm, fencing and open space	Threats Ongoing incremental land division will compromise outcomes if resolution not reached in a timely manner

Table 23: SWOT Analysis - Option C

Strengths Largest potential population growth	Weaknesses - Will result in the largest change to existing character - Will result in the greatest potential for land use conflict and interface issues - No realistic pathway to achieving density outcome in existing divided areas - Will compete with similar development typologies in City of Mount Gambier - Feedback suggests that the Option C is not supported by the City of Mount Gambier or community.
Opportunities None identified	Threats - Unlikely to engender broad community support - Resource overhead to coordinate infrastructure provisions will be significant - Likely to result in a large number of uncoordinated applications for resubdivision of existing allotments

The existing pattern of development in the Compton area has evolved over time and reflects a variety of approaches to the division of land and provision of infrastructure. Under existing policy, significant opportunity for additional development remains, however this will continue to occur in a largely uncoordinated, piecemeal fashion and likely be serviced through an ongoing proliferation of on-site wastewater disposal systems.

It is considered that doing nothing, or delaying further consideration of policy outcomes is not an acceptable solution and will result in greater risk of poor outcomes.



In considering a preferred option, it is considered that the area transitioning to residential densities (less than 800 square metre allotments) should be excluded. The existing area is too fragmented and the infrastructure coordination to achieve residential development densities across hundreds of existing allotments is not considered realistic. Such an outcome would result in a dramatic change to character of the area and is considered unlikely to engender significant support from the community.

Recognising that Council is not the decision maker in future zoning outcomes, but rather is a key stakeholder providing input to the Minister and State Planning Commission, an appropriate path forward at this time is to seek to further engage with the benefit of the information that has been gained during the preparation of the Strategic Land Use Priorities Project and the subsequent community consultation.

In seeking to engage on these issues to find a suitable policy outcome for the Compton area, a sensible position for Council to adopt is considered to be as follows:

- Council recognises the role of the Minister and State Planning Commission in the preparation of the Limestone Coast Regional Plan.
- Council has considered the extensive feedback including from the Minister in respect of the Moorak Estate Code Amendment, key stakeholders and the community.
- Council has considered growth scenarios for the future of the District Council of Grant comprehensively on a Council-wide basis in the Strategic Land Use Priorities Project.
- The current policy for the Compton area is inconsistent with good planning outcomes, and is failing to prevent the continued fragmentation of the land by division into allotments not consistent with policy requirements.
- The current policy does not provide a framework for the coordination of infrastructure, and will continue to result in a proliferation of on-site wastewater disposal systems.
- The current policy will not prevent the ongoing change of the character of the area through re-subdivision to achieve existing development opportunities.
- An improved policy framework would provide consistent guidance on average and minimum allotment sizes, matched with required infrastructure provision and requirement for urban design outcomes to achieve desired character outcomes, particularly for larger land divisions.

Whilst the exact minimum allotment sizes will be determined through the process, the outcome modelled in Option B is considered to represent the best balance between achieving efficient use of the available land, preserving desired character outcomes and providing opportunities for reticulated infrastructure for water and wastewater.

6.2 Lake Terrace East Employment Lands Expansion

The opportunity for future employment lands on the southern side of Lake Terrace East have been considered during strategic reviews over an extended period. Existing employment lands exist on the northern side of Lake Terrace East within the City of Mount Gambier, and opportunity presented for a logical expansion to the south to provide further land supply.



Feedback from the City of Mount Gambier indicated that they were not supportive of expansion of employment lands in this location, citing issues including:

- Interface with sensitive receivers including residential development and educational facilities.
- Potential risks/impacts on groundwater resources from industrial/commercial uses.
- Loss of productive primary production land.

In reviewing the potential benefits and drawbacks of additional employment lands in this location, it is noted that the potential rezoning has been identified at a strategic level and has not been pursued by landowners or proponents of development on the identified land.

Having regard to the supply and demand for industrial land across the District Council of Grant, it is not considered that the Lake Terrace East area will materially impact the adequate supply of future land. The issues highlighted in the feedback from the City of Mount Gambier do have merit, and whilst they would not necessarily rule out the use of the land for employment lands purposes, given the limited impact on overall employment lands supply and the lack of material demand to actually progress rezoning or development, it is considered reasonable for Council to not further pursue this land for future employment lands.

6.3 Yahl Expansion

The potential for expansion of residential development opportunity at Yahl has been considered by District Council of Grant in a number of strategic projects including the Rural Living and Townships Review (2019), the Inner Townships Master Plan (2023) and the Strategic Land Use Priorities project. Numerous landowners have approach Council over an extended period seeking to ascertain the opportunity for rezoning to provide for additional residential development opportunities.

It is recognised that expansion of Yahl would present some degree of challenge from an engineering and stormwater management perspective, and that some land in the vicinity of Yahl has high levels of agricultural productivity. However, there is no information to suggest that the engineering issues cannot be overcome (as they have been for existing development in Yahl), or that a moderate expansion contiguous with the existing township would materially impact the primary production capacity of the wider region.

Feedback from the City of Mount Gambier indicated that they were not supportive of expansion of employment lands in this location, citing issues including:

- Lack of services and facilities.
- Future expansion would entrench a vehicle dependant township.
- Loss of productive primary production land.

It is noted that feedback from the community during engagement on the multiple projects listed above, has typically supported a moderate level of further residential growth at Yahl, with opportunities for expansion having been identified to the south, east and west.



Modelling undertaken for Yahl in the Strategic Land Use Priorities Project indicated a maximum potential growth of 498 allotments and a population increase of 1,246 persons, this would represent a high-end scenario rather than a likely outcome.

Noting the feedback from the City of Mount Gambier, it is observed:

- Yahl already forms a hub of community activity as whilst there are no retail or other commercial activities, there is a thriving school, sporting facilities, community hall, public toilets and Country Fire Service facilities.
- Like almost everywhere in the Limestone Coast Region, including urban areas of the City of Mount Gambier, the almost complete lack of public transport services means the whole region is almost completely car dependant.
- Primary production land immediately adjacent Yahl is already compromised by the interface with the existing township and is not identified as being as productive as land located further to the west.

While the position expressed by the City of Mount Gambier is understood, it is considered that Yahl provides opportunity for a moderate expansion of residential development in a manner which achieves a high-quality residential environment, consolidated in an area where there is a significant level of community facilities and infrastructure.

If further development opportunities are prioritised immediately adjacent existing development, the potential exists to increase the number of allotments, whilst having the length of interface between residential development and primary production uses remain consistent with the current township boundaries.

It is considered appropriate to retain the proposal for the moderate approach of Yahl, undertaken in a manner that preserves the existing character, mitigates engineering and stormwater issues and mitigates the potential impact on adjacent primary production land.



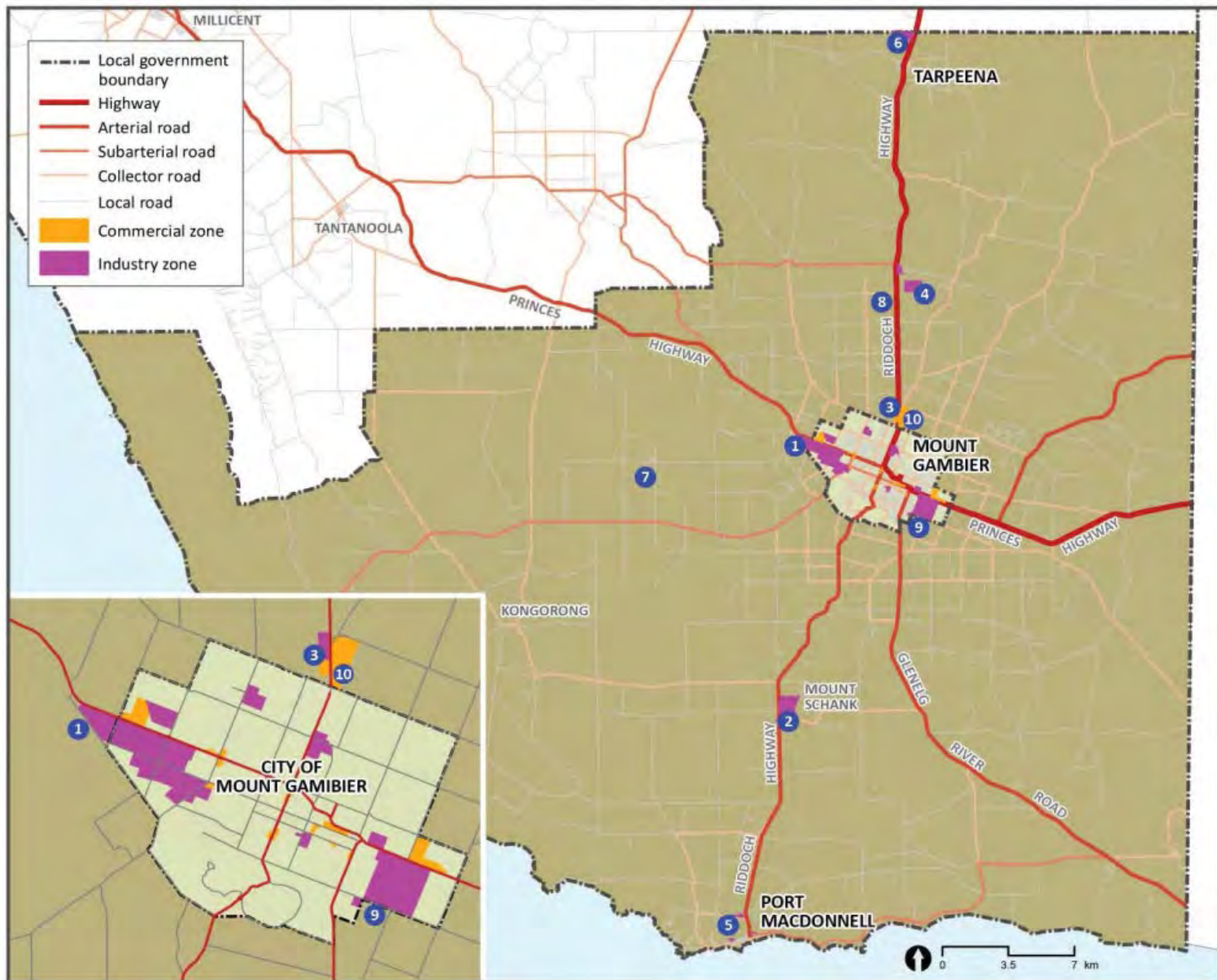
7 Council Adoption

At its meeting on 15 July 2024, Council resolved to receive, note and approve the Strategic Land Use Properties Project report, subject to the inclusion of the findings contained in the 'What We Heard' report and including adoption of the recommendations contained in the memo prepared following the engagement and subsequent Elected Members workshop. The final version of the report has been updated to reflect the resolution of Council.



Attachment 1

Extract from the Industrial Land Review and Master Plan



Attachment 1: Extract from 2016 *Industrial Land Review and Master Plan* showing locations of Report Recommendations.



Attachment 2

District Council of Grant Industrial Land Review and Master Plan 2016 (ILR)

DISTRICT COUNCIL OF GRANT INDUSTRIAL LAND REVIEW AND MASTER PLAN 2016 (ILR)				
ILR RECOMMENDATION	PLANNING & DESIGN CODE	COMMENTARY	REVIEW CONCLUSION	PRIORITY
Millicent Road Policy Area 1				
Retain this area, to service the western portion of the Council area, and the City of Mt Gambier, in the longer term.	Zone: Strategic Employment Overlays: Gateway, Hazards (Bushfire-General), Hazards (Bushfire-Urban Interface), Hazards (Flooding-Evidence Required, Native Vegetation, Prescribed Wells Area, Urban Transport Routes, Water Protection Area, Water Resources TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	Adjoins the City of Mount Gambier and is a logical extension to the industrial area within the City immediately to the east.	Recommendation remains valid, no action is required.	Not Required
Mount Schank Policy Area 2				
Rezone the northern part of the Policy Area to Primary Production Zone (now Rural Zone), with the southern portion being retained to service general and light industry activity in the southern part of the Council area.	Zone: Strategic Employment Overlays: Hazards (Bushfire-General), Hazards (Flooding-Evidence Required), Key Outback and Rural Routes, Native Vegetation, Prescribed Wells Area, Urban Transport Routes, Water Protection Area TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	Site is a significant distance from Mount Gambier and is relatively isolated. It directly adjoins Mount Schank State Heritage Area to the east, and rezoning would preserve open landscape and views to the SHA. There will still be 47 ha of undeveloped land available for service and light industry if the northern part is rezoned.	Recommendation remains valid, Code Amendment required.	Medium
Northern Gateway Policy Area 3				
Retain this area to service industrial activities which require a near City location.	Zone: Strategic Employment Overlays: Building Near Airfields, Gateway, Hazards (Bushfire-General), Hazards (Flooding-Evidence Required), Native Vegetation, Prescribed Wells Area, Urban Transport Routes, Water Protection Area, TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	Site is close to the City of Mount Gambier, it is on the route to the airport, and adjoins land to the east and south that is zoned Employment, which could be developed for commercial or light industrial uses.	Recommendation remains valid, no action is required.	Not Required
This area be extended to the west (and potentially longer-term to the north), subject to further investigations delineating suitable boundaries to limit adverse impacts on more "sensitive" development.	Zone: Rural Overlays: Building Near Airfields, Dwelling Excision, Hazards (Bushfire-General), Hazards (Flooding-Evidence Required), Key Outback and Rural Routes, Limited Land Division, Native Vegetation, Prescribed Wells Area, Water Protection Area, TNVs: Minimum Ground and Floor Levels 1.85m and 2.1m AHD, Minimum Dwelling Allotment Size 20ha	Extension to the west could help with infrastructure costs (incl. water and sewer), and providing access to Riddoch Highway via Sturm Road. Could also help to justify construction of a dual carriageway along Riddoch Highway, which is seen as desirable by Council.	Recommendation remains valid, Code Amendment required.	Medium
Penola Road Policy Area 4				

Rezone the northern portion (with frontage to Ridge Road) from Industry Zone to Primary Production Zone (now Rural Zone).	Zone: Strategic Employment Overlays: Aircraft Noise Exposure, Building Near Airfields, Gateway, Hazards (Bushfire-General), Hazards (Bushfire-High Risk), Hazards (Flooding-Evidence Required), Key Outback and Rural Routes, Native Vegetation, Prescribed Wells Area, Water Protection Area, TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	Northern portion seems less suitable for development, given topography and proximity to current approach and take-off paths for Mount Gambier Airport. An energy pellet plant on the southern portion has received planning approval from SCAP, and so the current zoning should be retained.	Recommendation remains valid apart from the proposal to rezone the southern portion (with frontage to Hutchinson Road) to Rural Zone. Code Amendment required. Investigations should include whether creation of an industrial park on airport land would be easier to achieve and would create a better outcome.	Medium
Rezone the southern portion (with frontage to Hutchinson Road) from Industry Zone to Primary Production Zone (now Rural Zone).	Zone: Strategic Employment Overlays: Aircraft Noise Exposure, Building Near Airfields, Gateway, Hazards (Bushfire-General), Hazards (Flooding-Evidence Required), Native Vegetation, Prescribed Wells Area, Water Protection Area, TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	Both of the above will result in there being no vacant zoned land being available at this strategic location for new industrial development, and so investigations into rezoning the alternative site along Riddoch Highway is supported. Agree that investigations will have to consider potential impacts on airport operations and access to Riddoch Highway.		Not Required
An alternative site, of approximately 40ha, be established to the west of the current southern portion with frontage to Riddoch Highway. This will require rezoning of this site from Primary Production Zone to Industry Zone.	Zone: Rural Overlays: Aircraft Noise Exposure, Building Near Airfields, Dwelling Excision, Hazards (Bushfire-General), Hazards (Flooding-Evidence Required), Key Outback and Rural Routes, Limited Land Division, Native Vegetation, Prescribed Wells Area, Water Protection Area, TNVs: Minimum Ground and Floor Levels 1.85m and 2.1m AHD, Minimum Dwelling Allotment Size 20ha	Creation of an industry park on airport land by Council is likely to be an easier outcome to achieve than rezoning land on the eastern side of Riddoch Highway.		High
Port MacDonnell Policy Area 5				
The Dingley Dell Road portion of the Policy Area be retained. While it is not clear if it is meeting its intended function of accommodating small home industries or is acting more as a de-facto rural living Area, it is not considered to be a significant matter requiring urgent attention.	Zone: Strategic Employment Overlays: Hazards (Bushfire-Urban Interface), Hazards (Flooding-Evidence Required), Native Vegetation, Prescribed Wells Area, Water Protection Area, TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	There are only a small number of allotments with development potential that are zoned Strategic Employment in the town. They should be retained.	Recommendation remains valid, no action is required.	Not Required
The Irven Street portion of the Policy Area be retained.	Zone: Strategic Employment Overlays: Hazards (Bushfire-General), Hazards (Bushfire-Urban Interface), Hazards (Flooding-Evidence Required), Native Vegetation, Prescribed Wells Area, Water Protection Area TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	There are only a small number of allotments with development potential that are zoned Strategic Employment in the town. They should be retained.	Recommendation remains valid, no action is required.	Not Required

The Boat Yard portion of the Policy Area be retained.	Zone: Strategic Employment Overlays: Hazards (Bushfire-Urban Interface), Hazards (Flooding-Evidence Required), Native Vegetation, Prescribed Wells Area, Water Protection Area TNVs: Minimum Frontage 20m, Minimum Site Area 2500sqm	There are only a small number of allotments with development potential that are zoned Strategic Employment in the town. They should be retained.	Recommendation remains valid, no action is required.	Not Required
At the Boat Yard portion, investigate opportunities to repurpose part of the Council Depot site for light industry.	As above	Rezoning is not required. Council may wish to consider that this land is used as a precinct to accommodate coastal crayfish processing operations.	Recommendation remains valid. Council to undertake relevant investigations.	High
At the Boat Yard portion, extend development north of current activities - still within the Industry Zone.	As above	Rezoning is not required. Council may wish to consider that this land is used as a precinct to accommodate coastal crayfish processing operations.	Recommendation remains valid. Council to undertake relevant investigations.	High
At the Boat Yard portion, investigate opportunities to extend development to the west (rezoning land from Open Space zone).	Zone: Open Space Overlays: Hazards (Bushfire-Medium Risk), Hazards (Flooding-Evidence Required), Native Vegetation, Prescribed Wells Area, Water Protection Area TNVs: Finished Ground and Floor Levels 2.5m and 2.75m AHD	Could provide a logical extension to the existing zoned area. However, it requires significant investigation to confirm suitability of the site for industrial purposes, including whether the land would be made available by the Crown, infrastructure availability, access and potential impact on adjoining residents.	Recommendation remains valid, relevant investigations to be undertaken prior to consideration of a Code Amendment.	High
Tarpeena Policy Area 6				
The eastern portion of this Policy Area, accommodating the Timberlink Australia sawmill and timber processing plant, be retained in the Industry Zone.	Zone: Strategic Employment Overlays: Hazards (Bushfire-Medium Risk), Hazards (Flooding-Evidence Required), Key Outback and Rural Routes, Native Vegetation, Prescribed Wells Area, Water Protection Area, Water Resources	The Timberlink Australia sawmill and timber processing plant is a significant facility, and the zoning should be retained.	Recommendation remains valid, no action is required.	Not Required
The western portion of this Policy Area, accommodating electricity transmission lines and forest plantation, be rezoned from Industry Zone to Primary Production Zone (now Rural Zone).	Zone: Strategic Employment Overlays: Hazards (Bushfire-High Risk), Hazards (Flooding-Evidence Required), Key Outback and Rural Routes, Native Vegetation, Prescribed Wells Area, Water Protection Area, Water Resources	Given poor access and current use for plantation forestry and for transmission lines, it is unlikely this land would be developed for industrial purposes. Not seen as a priority however as rezoning does not create new development opportunities.	Recommendation remains valid, Code Amendment required.	Low
Primary Production Zone (now Rural Zone)				
That "General Industry" be deleted form the non-complying list in the Primary Production Zone to provide greater flexibility to approve industries associated with "produce" in the zone.	Industry, including General, Light and Special Industry are all envisaged within the Rural Zone. Proposals will follow the performance assessed pathway. Policies within the Rural Zone seek to limit scale of industrial activities and that they are related to primary production. The Rural Horticulture Zone to the south of the City of Mount Gambier has similar policy, however there is more restrictive policy regarding scale of development.	Transition to the Rural Zone and Rural Horticulture Zone in the Planning and Design Code has addressed this issue.	Recommendation remains valid, no action is required.	Not Required

Industry in Other Zones				
Retain current policy position that supports the potential for industry (primarily light and service industry) in the Airfield, Commercial, Rural Living, Settlement, Town Centre and Township Zones).	Proposals for light industry can be assessed within Township, Township Activity Centre and Rural Living Zones, and will follow the performance assessed pathway. Proposals may be subject to public notification. Light industry is envisaged in the Employment Zone, will follow the performance assessed pathway and may be subject to public notification. See below for the Infrastructure (Airfield) Zone.	Transition to the Planning and Design Code has addressed this issue.	Recommendation remains valid, no action is required.	Not Required
Airfield Zone (now Infrastructure (Airfield) Zone)				
That policy within the Airfield Zone be amended to achieve greater conformity with the Master Plan, particularly to loosen the nexus between light, service industry and warehousing only being envisaged where "ancillary to and in association with aviation activities".	Light industry and stores are envisaged in Infrastructure (Airfield) Zone, associated with and ancillary to aviation activities. Proposals will follow the performance assessed pathway. Light industry and stores that are not associated with and ancillary to aviation activities could also be assessed as performance assessed development but would be more difficult to justify and would be subject to public notification.	The Planning and Design Code has carried over policy requiring light industry and warehouses are associated with and ancillary to aviation activities. Removing this restriction from the current zone may be difficult to achieve as it is core Code policy for airports across the State and is reasonable to have in place. If Council identifies surplus land at the airport a Code Amendment to rezone this land to Strategic Employment Zone could be undertaken to create an industrial park. As the landowner, Council is in a strong position to proceed with this recommendation. Creation of an industry park on airport land by Council is likely to be an easier outcome to achieve than rezoning land on the eastern side of Riddoch Highway.	Recommendation remains valid, relevant investigations to be undertaken prior to consideration of a Code Amendment.	High
Longer-term site on Lake Terrace East, adjacent to the south-eastern boundary of the City of Mount Gambier				
That the site be further investigated as a potential longer-term location for light industry/commercial development.	Zone: Rural Horticulture Overlays: Dwelling Excision, Hazards (Bushfire-General), Hazards (Flooding-Evidence Required), Limited Land Division, Native Vegetation, Prescribed Wells Area, Water Protection Area TNVs: Finished Ground and Floor Levels 1.85m and 2.1m AHD, Minimum Site Area 15ha	Site is adjacent to the City of Mount Gambier and adjoins land in the City already zoned Strategic Employment and Employment. There is no undeveloped land in Grant on the eastern side of the City that is zoned for industrial use. So location wise this site makes sense. However there appears to be little demand to develop sites included in the ILR, and so this site could remain a longer term option.	Recommendation remains valid, relevant investigations to be undertaken in the medium to longer term prior to consideration of a Code Amendment.	Low



Attachment 3

What We Heard Report



What We Heard

Strategic Land Use Priorities Project Report

Community Engagement

July 2024

What We Heard

Strategic Land Use Priorities Project Report

Community Engagement

July 2024

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Version	Date	Detail	Prepared	Review
Final	3 July 2024	53133REP02	KF	

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Appendices

Appendix	Strategic Land Use Priorities Plan Summary Report
Appendix	Strategic Land Use Priorities Plan Online Survey
Appendix	Moorak Estate Code Amendment Letter

1 The Strategic Land Use Priorities Project

The State Planning Commission has commenced preparation of seven Regional Plans across South Australia, including one for the Limestone Coast. Regional Plans provide a long-term vision for a region to guide land use planning over a 15-to-30-year period, with a particular focus on the integration of land use, transport infrastructure and the public realm.

Strategic and policy planning informs the Regional Plan through a joint process which includes the State Government, Local Government along with industry and community stakeholders. The Minister for Planning and the State Planning Commission are the key decision makers, but Council has a key role in providing local context, recommending policy amendments and identifying opportunities for strategic growth and development. Once the Regional Plan is in place, Council also has a key role in facilitating the envisaged development for their area.

In 2022, District Council of Grant engaged consultants MasterPlan to undertake modelling of future employment and residential growth options and prepare a data report outlining options and recommendations as to how future growth could be accommodated without impacting the character of the district.

Population growth is influenced by a variety of factors, the majority of which are external to the control of Council. The Council has a role in managing growth through input into strategic planning and infrastructure development processes. The State Government undertakes population data collection and modelling at the State and Local Area levels.

The resulting report, titled the Strategic Land Use Priorities Project ('SLUPP'), forms an important input to the Limestone Coast Regional Plan, ensuring growth opportunities within the District Council of Grant are accurately identified. The Limestone Coast Regional Plan will also be used to support future potential Code Amendments (rezoning). These Code Amendments may be led by the State Government, Council, a landowner or developer at some time in the future.

The Strategic Land Use Priorities project is focused on two types of growth:

- Employment Growth
 - Review of supply of land for industrial development throughout the Council area.
- Residential Growth
 - How population growth can be spatially accommodated within the Council area.

The SLUPP report provides a detailed assessment and priority actions and recommendations relating to key land uses in the Council area for consideration by the State Planning Commission.

2 How We Engaged

The SLUPP report put forward a number of recommendations, for both industrial growth and residential growth. The report has primarily been developed as a data analysis report to support Council decision making and input into the development of the Limestone Coast Regional Plan by the State Planning Commission.

Council resolved to seek community feedback on the Strategic Land Use Priorities report, with this public feedback used to validate the SLUPP report and define Council's input into the regional planning process. It was also envisaged that this information may assist the community with making informed submissions when engagement on the Limestone Coast Regional Plan is undertaken by the State Planning Commission. It is worth noting, that this community engagement is in addition to the stakeholder engagement undertaken during preparation of the SLUPP report (see Section 2.0 of the SLUPP report).

The following documents were prepared by MasterPlan for publication on the Your Say DC Grant community engagement platform over the 3-week consultation period:

- Strategic Land Use Priorities Plan (full report).
- Strategic Land Use Priorities Plan (summary report) (**Appendix A**).
- Strategic Land Use Priorities Plan Online Survey (**Appendix B**).
- Written submission template (online or via email).

An explanatory narrated PowerPoint presentation was also prepared to support the above listed documents. Whilst a draft was provided to Council Administration, review and subsequent approval of the document was not received prior to the closure of the consultation period.

Discussions were also held with key stakeholders in the local development industry.

3 Who We Heard From

A total of 23 stakeholders provided their views and feedback during the three-week consultation period, either as a written submission (online or via email) or by completing the online survey. One of those responses was in the form of a written submission that did not directly address the survey questions..

- Respondents represented several distinct stakeholder groups:
- District Council of Grant Resident (13 respondents);
- Business owner in the District Council of Grant (3 respondents);
- Non-resident District Council of Grant Landowner (2 respondents); and
- Other (4), including a future resident of District Council of Grant, Real Estate Agent in Mount Gambier and Districts, Project Management, and family of District Council of Grant landowner.

A summary of submissions received by stakeholder group is shown in **Figure 1**.

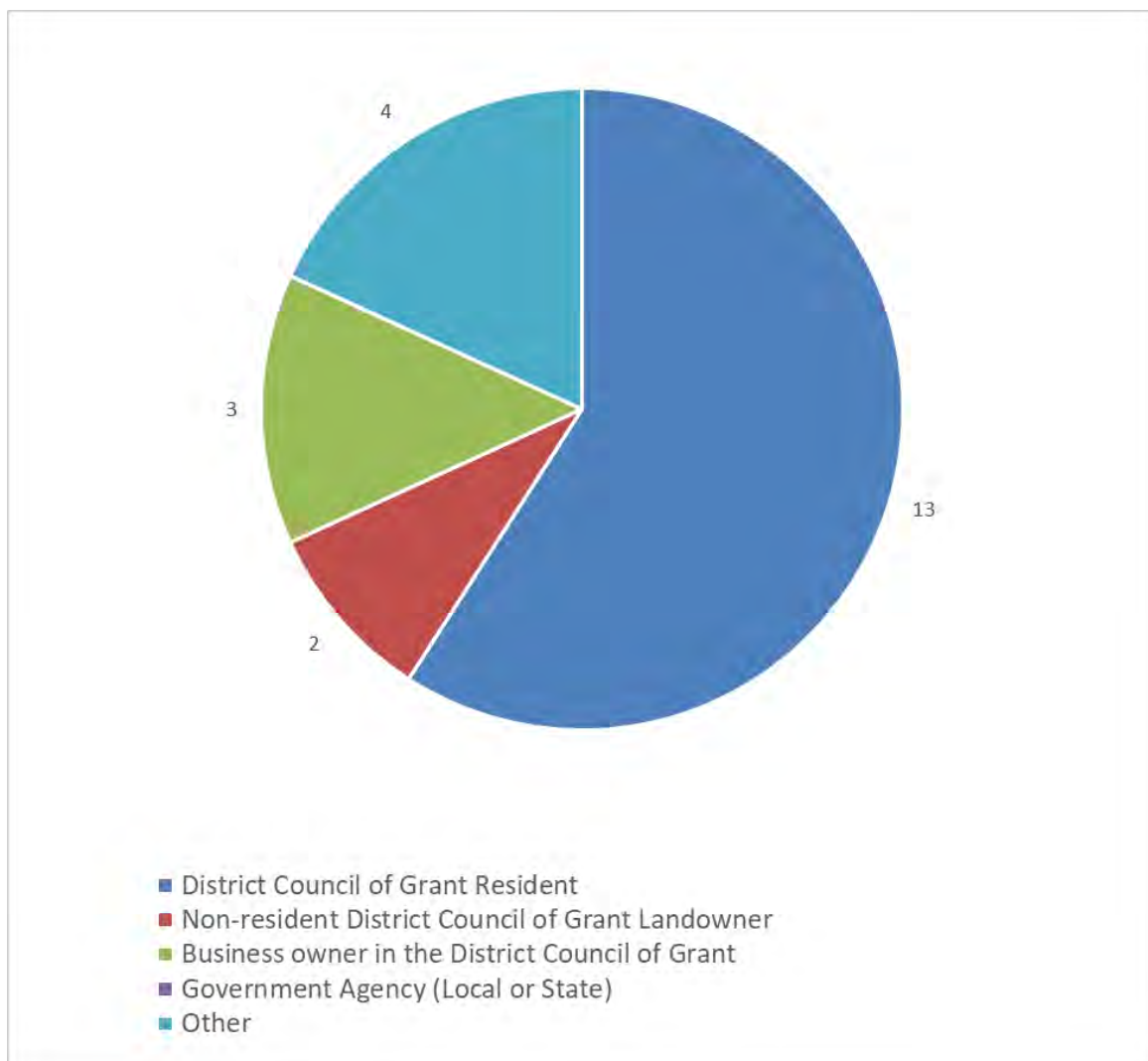


Figure 1: Submissions received by stakeholder group.

Most respondents were interested in Residential Zoning (14), followed by both Residential and Industrial Growth (8).

In reviewing stakeholder feedback, it is important to note that the number of responses (23 responses), and the subjective nature of the submissions, means that data received cannot be considered a definitive position that reflects the opinions of the District Council of Grant population as a whole. However, when considered together with existing data, the feedback received, provides Council with guidance on a range of matters to consider when validating land use policy matters covered in the Strategic Land Use Priorities Project. Ultimately, where the survey responses do not provide a clear direction on a matter, due to divided opinions, it is Council's role to make a decision which policy direction to advocate..

4 What We Heard

This What We Heard Report is a summary document of the stakeholder feedback received during the consultation period for consideration. The report does not seek to provide any recommendations or responses to the feedback received.

For the entirety of understanding, it is recommended that this ‘What We Heard’ report be read in conjunction with the written submission and online surveys, received and attached verbatim at **Appendix C**.

4.1 Employment Growth

Respondents were asked to identify from a list, the key challenges that currently hold back the development of industrial land in the Council area. Key challenges ranked (highest to lowest number of responses received), are shown in **Table 1** below:

Table 1: Key Challenges to Development of Industrial Land

Rank	Key Challenges Identified by Respondents
1	Infrastructure is still undeveloped (i.e. water, sewer, electricity, road network).
2	Access to skilled workers.
2	Lack of housing for workers.
3	Land is in the wrong location (i.e. topography, interface with residential land, lack of access).
3	Limitations on Transport/Freight routes (i.e. Heavy Vehicle routing).

Other challenges identified by respondents can be broadly summarised as follows:

- Upgrade roads along heavy vehicle (B-Double) freight routes to assist businesses in delivering and receiving their products and services more efficiently.
- Improve access to reliable mobile coverage (address gaps in coverage) to improve digital connectivity in the region including for those travelling arterial roads.
- Improve access to fast, reliable and affordable internet services.
- Increasing freight costs undermining competitiveness and ability to scale.
- High prices for regional flights (needs to be more cost-effective to travel by air).
- Lack of affordable and quality housing.

Respondents were asked to identify potential growth industries. Potential growth industries identified by stakeholders can be broadly summarised as follows:

- Value-adding to agricultural, fisheries and forestry industries.
- Diversification of agriculture and other industries.
- Warehousing and distribution.
- Services that support industries and businesses including Trade Services (e.g. Builders, Plumbers, Electricians).
- Forestry and Timber, including processing.

- Work From Home (i.e. workers choosing to work remotely from rural areas).
- Tourism, including fishing tourism, coastal tourism, and cave tourism.
- Hospitality, including to support tourism.
- Retail.
- Green economy including renewable energy generation such as wind and solar.
- Fabrication and manufacturing.
- Education.
- Transport and Logistics.
- Regional industry innovation hub.

Respondents were further asked in relation to the potential growth industries, if the Strategic Land Use Priorities Project report catered for such industries. Responses can be broadly summarised as follows:

- A need for increased connectivity to support the vast range of digital technologies in industries.
- Access to skilled workers and training centres.
- Flat area north of Sturms Road should be preserved for light to medium industry, transport and logistics.

Respondents were asked if they believed the recommendations contained in the Strategic Land Use Priorities report allowed for sufficient industrial land, for the next 15 – 30 years. Seven (7) respondents believed sufficient industrial land was allowed for, seven (7) did not believe there was sufficient land, and two (2) did not know.

Further comments provided by respondents, can be broadly summarised as follows:

- Good access required to important transportation infrastructure.
- Council to be proactive and ensure no industrial uses in the vicinity of residential areas, or unduly impact on residential amenity.
- Council to support rezoning for industrial growth if required.

Respondents were asked if, in principle, they supported the Council's proposal for a Regional Industrial Park at Glenburnie (near the existing Mount Gambier & Districts Saleyards). Fourteen (14) respondents in principle supported the proposal, one (1) did not support the proposed, and three (3) don't know. Further comments provided by respondents can be summarised as follows:

- Must be located to the east of the Saleyards to avoid highly productive land.
- Must be well sited with good access to important transportation infrastructure, including connection to:
 - Heavy vehicle bypass.
 - Future reinstatement of freight rail service.
- Minimise interface issues to support 24/7 operations.
- Should not include heavy industry.
- Need to maintain aesthetics, level of amenity within the area.

4.2 Residential Growth

Respondents were asked to identify from a list, the key challenges that come with increasing resident population in the Council area. Key Challenges, ranked (highest to lowest number of responses received), are shown in **Table 2** below:

Table 2: Key Challenges to Residential Growth

Rank	Key Challenges Identified by Respondents
1	Conflict between residential development and primary production activities (i.e. fragmentation of productive land, interface and cropping activities and/or management of animals).
2	Lack of housing diversity (i.e. dwelling types, allotment sizes).
2	Lack of essential services (i.e. schools, medical services, community services).
3	Housing affordability (both rental and home ownership options).
3	Infrastructure is still undeveloped (i.e. water, sewer, electricity, road network).

Other challenges identified by respondents can be broadly summarised as follows:

- Strategic Land Use Priorities Project report does not set an ambitious target; requires ambitious targets for long-term planning for growth.
- All business needs a population base to sustain and grow with confidence.
- Poor quality builds.
- Fragmentation of productive land.
- Maintain the City-Country feel.
- 5,000 square metres allotments are what is in demand and should be the minimum allotment size in Compton.
- Large allotments (low-density) for residential living is unsustainable.
- Allotments in Compton should be no less than 5,000 square metres.

With regard to allotment size, the Strategic Land Use Priorities Project report anticipates that residential allotments that are larger than 5,000 square metres in the area are likely to be less in demand. Nine (9) respondents agreed, seven (7) disagreed, and three (3) don't know.

It is worth noting that the sizable number of responses (surveys and a written submission) relate to the previously proposed (and subsequently refused) Private Proponent led 'Moorak Estate' Code Amendment. This has influenced the survey responses with regard to residential growth.

Feedback from this group of residents can be summarised as:

- Opposition to what they perceive as 'high density' residential development within Compton.
- Look and feel that future residential development may have, including use of Colorbond or other solid fencing.
- Preference for minimum allotment size of 5,000 square metres.
- Desire to protect the rural landscape.

- Perceptions of unfairness (e.g. ‘I couldn’t subdivide my land to less than 5,000 square metres, so why should they be allowed to’).
- Reference to the Minister for Planning, correspondence to the proponent for the Moorak Estate Code Amendment outlining the Minister’s reasons for refusing to initiate the Code Amendment. The respondent asserts that the reasons the Minister elected not to support the Proposal related to his desire to see the land used for large rural living allotments.

Whilst this report does not seek to provide any recommendations or responses to the feedback received, in respect to this last item, it is important to clarify the reasons for the Minister not to support the Proposal. The correspondence from the Minister of Planning to the proponent, dated 28 October 2022, a copy of which is attached at **Appendix D**, states:

I note that the subject land forms part of a larger rural living zone in close proximity to the City of Mount Gambier. Whilst I note that the proposal seeks to explore the application of the Neighbourhood Zone, the level of density sought is more akin to that expected in the Rural Living Zone. As it stands, I consider that the proposal does not encourage the orderly expansion of the urban area and am of the view that the future densification should be explored by the District Council of Grant and the City of Mount Gambier as part of the regional planning process currently underway.

(Emphasis added).

It is our opinion, that the Minister for Planning considered that the proposal could impact the future expansion of the urban area in an orderly manner through inefficient use of the available land, and could result in inefficient delivery of infrastructure and social services and that a higher density of residential development should be considered by DC Grant and the City of Mount Gambier as part of the Limestone Coast Regional Plan process.

Respondents were asked, after reviewing the growth modelling contained in the Strategic Land Priorities Project report, where from a list, they preferred to see residential growth occur. Areas, ranked (highest to lowest number of responses received), are shown in Table 3 below:

Table 3: Preferred Residential Growth (Townships)

Rank	
1	Worrolong Rural Living Area
1	Suttontown B Rural Living Area (Pine Hall Avenue)
2	Coastal and River Townships
2	Suttontown A Rural Living Area (Princes Highway)
3	Allendale East
3	Compton
4	Kongorong
5	Port MacDonnell

Rank	
5	Mil L B Rural Living Area (Sherwin Road)
5	Other
6	Compton A Rural Living Area (Illman Road)
6	Yahl
7	Tarpeena

Other townships identified by respondents included:

- Pelican Point.
- Glenburnie (Rural Living).
- Eight Mile Creek.

Other comments included:

- No growth projection for Blackfellows Caves included in the Strategic Land Use Priorities Project report (mainly holiday homes and not permanent residents).
- Land division must result in sites that are accessible and suitable for their intended purpose, including:
 - Road infrastructure (including vehicles entering and exiting the land division, impact on existing roads);
 - Stormwater infrastructure; and
 - Social infrastructure.
- Preference to see expansion of existing townships where infrastructure is already established.
- Residential development must avoid highly productive land used for agricultural purposes.

Respondents were asked if they support the Residential Growth recommendations contained in the Strategic Land Use Priorities report, eight (8) supported the recommendations, eight (8) did not support the recommendations, and three (3) don't know. Further comments provided by respondents, can be broadly summarised as follows:

- Road, stormwater and social Infrastructure is required to support growth.
- Strategic Land Use Priorities Project report does not set an ambitious target; require ambitious targets for long-term planning for growth.
- Council to advocate for dual lanes from Mount Gambier to Tarpeena.
- New housing must:
 - be affordable;
 - good quality builds; and
 - have access to social infrastructure such as school bus, open space within walking distance, public transport etc.

4.3 General Comments on the Strategic Land Use Priorities Project

Respondents were provided with the opportunity to provide general comments on the Strategic Land Use Priorities Project outcomes and recommendations.

These comments can be broadly summarised as follows:

- Penola Road Policy Area 4 should remain as a priority to rezone from Industry to Rural Zone.
- Consider rezoning the former CSIRO buildings north-west of the Mount Gambier Regional Airport, as it is not suitable for rural land uses.
- Land in Compton (McKay Road, White Avenue) to have a minimum allotment size of 5,000 square metres.
- Strategic Land Use Priorities Project report does not provide for a southern bypass route around Mount Gambier.
- Residential development should be focused to the east:
 - to support proposed Regional Industrial Park at Glenburnie.
 - on land with limited productive capacity (agricultural).
- Protection of heritage buildings in growth areas.
- Minimum lot size of 5,000 square metres in rural living areas.
- More roadside tree planting.
- Reduce 'red tape' and unnecessary delays in assessing development applications to support commercial and residential development.
- Maintain sense of community.
- Council needs to 'be bold' and act with 'urgency' and 'gusto' to support growth and prevent further loss of important services such as health services and hospitals.
- Lack of community engagement by Council on proposed 'rezoning' included in the Strategic Land Use Priorities project report.
- Lack of community engagement with Compton residents on this Code Amendment.
- Failure of the SLUPP report to consider feedback received from Compton residents at previous public consultation activities, including consultation for projects previously undertaken by Council and projects unrelated to Council.
- Potential to accommodate a designated zone to accommodate tourists, holiday accommodation, and 'Tiny Homes' in the vicinity of Port MacDonnell and either side of Eight Mile Creek. Such development that allows for relocation, 'retreating' from high tides, coastal erosion etc. Visitors and short-term residents to support the established Port MacDonnell population and the steadiness of services and businesses in Port MacDonnell.

4.4 Regional Plan for the Limestone Coast Advocacy

Respondents were provided with the opportunity to identify the key priorities they believed Council should be presenting to the State Planning Commission on behalf of residents. These comments can be broadly summarised as follows:

- Penola Policy Area 4 should remain as a priority to rezone from Industry to Rural Zone.

- Duplication of the Riddoch Highway between Mount Gambier and Tarpeena to:
 - foster growth in Tarpeena; and
 - improve transport efficiency.
- Understand which roads are being used as freight routes. Fund and upgrade key freight routes.
- New housing must be:
 - affordable;
 - good quality builds; and
 - sustainable (solar panels, quality insulation, electrical appliances (i.e. no gas)).
- Rezoning process to be simpler and have more input from Council.
- More community input into local planning.
- Residential growth needs to be supported by access to social infrastructure and community services, for example schools, hospitals, open space.
- Maintain existing minimum site areas in rural living areas.
- Employment.
- Tourism.
- Affordability.
- Maintain character (and integrity) of existing areas.

5 Recommended Next Steps

Feedback provided during the engagement outlined in **Section 2**, with existing data contained in the draft SLUPP report, provides clear guidance on the issues considered by the SLUPP.

Continuing the consultant team's commitment to collaborate with Council Administration and Elected Members throughout every phase of the SLUPP, it is recommended that:

1. Council proceeds to receive the Strategic Land Use Priorities Project report, the 'What We Heard' Community Engagement report, subject to recommendations in respect of Compton, Lake Terrace East and Yahl as set out in the 'Strategic Land Use Priorities Project – Status and Next Steps' memorandum.
2. Council Chief Executive Officer proceed to engage with Planning and Land Use Services staff and the State Planning Commission, providing this information and seeking to meet and make presentations on the position of Council for the purpose of further informing the preparation of the Limestone Coast Regional Plan.

Appendix

Strategic Land Use Priorities Plan Summary Report



Strategic Land Use Priorities Project Summary Report

April 2024

How to read this Summary Report

This Summary Report has been prepared to provide a general overview of the outcomes of the Strategic Land Use Priorities Project.

The **(Sections)** and **(Attachments)** contained in this Summary Report provide a quick reference to guide the reader to the more detailed discussion contained in the full Strategic Land Use Priorities Project document.

Strategic Land Use Priorities Project

The State Planning Commission has commenced preparation of seven Regional Plans across South Australia, including one for the Limestone Coast. Regional Plans provide a long-term vision for a region to guide land use planning over a 15 to 30 year period, with a particular focus on the integration of land use, transport infrastructure and public realm.

Strategic and policy planning informs the Regional Plan through a joint process which includes the State Government, Local Government along with industry and community stakeholders. The Minister for Planning and the State Planning Commission are the key decision makers, but Council has a key role in providing local context, recommending policy amendments and identifying opportunities for strategic growth and development. Once the Regional Plan is in place, council also has a key role in facilitating the envisaged development for their area.

In 2022, District Council of Grant engaged consultants MasterPlan to undertake modelling of future employment and residential growth options and prepare a data report outlining options and recommendations as to how future growth could be accommodated without impacting the character of the district.

Population growth is influenced by a variety of factors, the majority of which are external to the control of Council. Council has a role in managing growth through input into strategic planning and infrastructure development processes. The State Government undertakes populations projections at a State and Local Area level.

The resulting report, titled the Strategic Land Use Priorities Project, forms an important input to the Limestone Coast Regional Plan, ensuring growth opportunities within the District Council of Grant are accurately identified. The Limestone Coast Regional Plan will also be used to support future potential Code Amendments (rezoning). These Code Amendments may be led by Council, a landowner or developer at some time in the future.



The Strategic Land Use Priorities Project is focused on two types of growth:

Employment Growth:

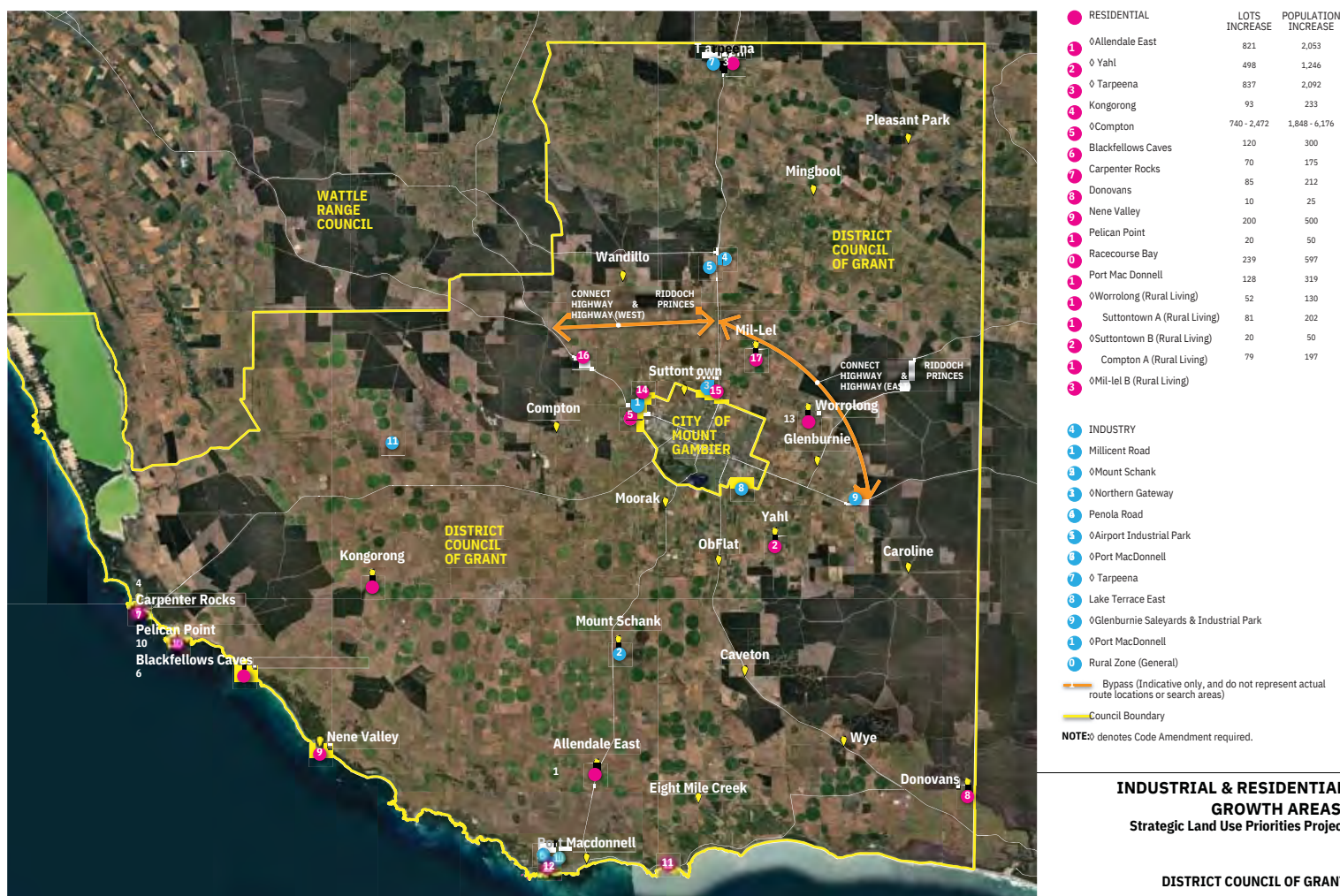
- Review of supply of land available for industrial development throughout the Council area.

Residential Growth:

- How population growth can be spatially accommodated within the Council area.

The Strategic Land Use Priorities Project document provides a detailed assessment and priority actions and recommendations relating to key land uses in the Council area for consideration by the State Planning Commission.

A map of the District Council of Grant area shows the location of each of the industrial and residential growth area opportunities (**Attachment 4**).



IMPORTANT

The Strategic Land Use Priorities Project has primarily been developed as a data analysis report to support Council decision making and input into the development of the Limestone Coast Regional Plan by the State Planning Commission.

All recommendations are subject to further investigation and consultation with landowners before any Code Amendment processes proceed.

Employment Growth (Section 3.0)

This part of the project focused on reviewing supply of land for industrial development throughout the council area.

Industrial Land Review and Master Plan (Section 3.1)

In 2016 the District Council of Grant engaged consultants URPS to undertake an Industrial Land Review and Master Plan. The Industrial Land Review and Master Plan included a thorough review of the issues related to industrial development, including:

- Strategic context
- Zone policies under the Grant Council Development Plan (as it was pre-Planning and Design Code)
- Supply and demand of land for industrial purposes
- The role of infrastructure
- Separation distances
- The Blue Lake Groundwater Capture Area and Buffer Area
- Bushfire Risk

Based on the investigations and consultation undertaken, the Industrial Land Review and Master Plan made a number of recommendations, mostly related to individual sites already zoned for industrial use.

The overall effect of the recommendations would result in the combined area zoned for industrial purposes being reduced from the current 345 hectares to some 215-305 hectares. It was considered this area would still far exceed the desired requirement for the rolling 15-year 'industrial land bank' considered necessary to meet future demand.



Changes since the Industrial Land Review and Master Plan (2016) (Section 3.2)

Implementation of Planning and Design Code

In the six (6) years since the Industrial Land Review and Master Plan was completed, the Planning and Design Code has been implemented across South Australia replacing the Grant Council Development Plan. The Planning and Design Code now provides a single source of planning policy for assessing development applications across the State.

The transition to the Code brought a number of relevant changes, in particular:

- The Industry Zone (and Policy Areas referred to in the Industrial Land Review and Master Plan) have transitioned to a Strategic Employment Zone, which has a similar intent but does not have site specific policy as the previous zones did
- The Commercial Zone has transitioned to an Employment Zone, which has a similar intent
- The Primary Production Zone has transitioned to a Rural Zone which has increased flexibility for industrial proposals to be considered within primary production areas
- General policy related to issues such as interface between uses, transport access and parking have been updated
- A number of issues such as bushfire risk, flooding and native vegetation are now applied via a series of Overlays

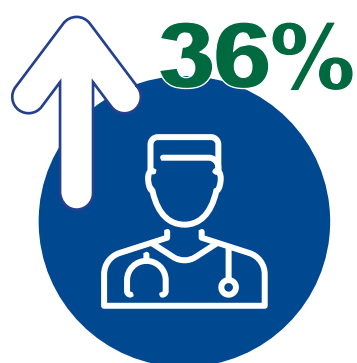
Regional Employment

The 2021 Australian Census shows that over the last decade manufacturing has declined as an industry of employment for residents of the District Council of Grant.

In 2011 manufacturing was ranked as the second highest employer with 503 residents of the District Council of Grant employed. In 2021 manufacturing had dropped to fourth place, with 338 residents employed. This represents a 33 per cent decrease in residents employed in manufacturing jobs over ten (10) years. This trend has occurred even though the population in District Council of Grant has increased by 10 per cent over the same period. This decline in manufacturing employment figures is generally consistent with the figures recorded for neighbouring City of Mount Gambier, the Limestone Coast and South Australia as a whole.

Agriculture, forestry and fishing has consistently been the highest employment sector in District Council of Grant with 867 residents employed in the sector in 2021, after a 4 per cent increase over ten (10) years.

The sectors with the greatest growth over the last ten (10) years have been:



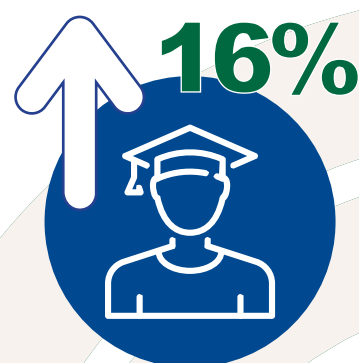
Health Care &
Social assistance

with 458 residents in
2021



Construction

with 404 residents in
2021



Education &
Training

with 285 residents in
2021

Development of Zoned Land

A desktop review has been undertaken to determine the extent of new development that has taken place on the sites considered in the Industrial Land Review and Master Plan.

With only one exception, none of the sites considered for rezoning through the Industrial Land Review and Master Plan have been further developed. For the most part, the undeveloped portions of the sites in the Industrial Land Review and Master Plan continue to be used for farming purposes, or in a small number of instances for large-block residential use.

Employment Growth Recommendations

Subject to agreement from landowners, the Strategic Land Use Priorities Project recommends:

- 1 Retain Millicent Road Policy Area 1
- 2 Rezone Mount Schank Policy Area 2 to Primary Production Zone
- 3 Retain the Northern Gateway Policy Area 3 and extend it to the west, subject to further investigations
- 4 Rezone two portions of Penola Road Policy Area 4 to Primary Production Zone
- 5 Retain the three portions at Port MacDonnell Policy Area 5 and consider options for further development of the Boat Yard portion (including an extension to the west)
- 6 Retain the eastern portion of Tarpeena Policy Area 6 (Timberlink Australia site) and rezone the western portion that accommodates forest plantation and electricity transmission lines to Primary Production Zone
- 7 Amend policy in the Airfield Zone at Mount Gambier Airport to loosen the nexus between light, service industry and warehousing with aviation activities and allow for a broader range of employment uses

8

Work with the State Planning Commission to include relevant policy in the Limestone Coast Regional Plan that will support implementation of the Industrial Land Review recommendations, in particular, the recommended rezonings

9

Support the preparation of a business case by Regional Development Australia Limestone Coast proposing a new intermodal terminal just to the north-east of the Saleyards, to facilitate movement of freight by rail (as opposed to by road), to the Port of Portland, Melbourne, Adelaide and elsewhere in Australia. The business case will be put to Infrastructure Australia to secure support and funding.

10

Investigate the creation of a Regional Industrial Park at Glenburnie adjacent to the Saleyards that builds on the success of the Saleyards operations, and which will be able to support and capitalise on the opportunity an intermodal terminal could provide.

11

Monitor the implications of the closure of the Millicent Saleyards and consider the specific implications for the Mount Gambier & District Saleyards at Glenburnie.

12

In conjunction with relevant stakeholders identify a suitable location for a precinct to accommodate coastal crayfish processing operations at Port MacDonnell. Council may wish to consider the Boat Yard site as a potential location, consistent with the recommendations of the Industrial Land Review. Inclusion of a visitor facility and restaurant would create the opportunity to expand the business.



Residential Growth (Section 4.0)

This part of the project focused on residential growth modelling to determine the spatial requirements to house an increased population in the Council area.

Growth modelling has included review of:

- Housing and population statistics from the 2021 Census
- Hypothetical growth scenarios for an increased population
- Relevant spatial parameters – average household size, range of allotment sizes, land required for provision of public infrastructure such as roads, open space, drainage
- Aggregate land required to achieve growth scenarios
- Spatial analysis of growth options in and around each township, Port MacDonnell, coastal and riverine townships and rural living areas. This has taken into account the findings of previous master plans prepared for Council – the River and Coastal Communities Urban Design Framework (2014) and the Rural Living and Township Zone Boundaries Review and Master Plan (2020)
- Estimation of additional allotment yield and population increase for each location



Background (Section 4.1)

The current population in Grant LGA (2021 Census) was 8,636 residents. Over 95 per cent of dwellings in the District Council of Grant are separate houses, and average household size has remained consistent (with a slight decrease) over the last ten (10) years at a rate of 2.7 persons per dwelling in 2011, and 2.6 persons per dwelling in 2021. Council provided two residential growth scenarios for consideration:

Scenario 1



**Population growth to 10,000 residents
(Section 4.4):**

This equates to an increase of 1,364 residents. Represents a population growth outcome which is highly likely to occur in the medium term on the basis of organic population growth rates which have historically occurred in the region.

Will require an additional estimated 546 dwellings (1,364 divided by an average household size of 2.5 persons).

Scenario 2



**Population growth to 15,000 residents
(Section 4.5):**

This equates to an increase of 6,364 residents. Represents a significantly higher population, which if achieved, will either occur in the long to very long term or potentially more rapidly if a significant, sustained uptake in growth rates is experienced.

Will require an additional estimated 2,547 dwellings (6,364 divided by an average household size of 2.5 persons).

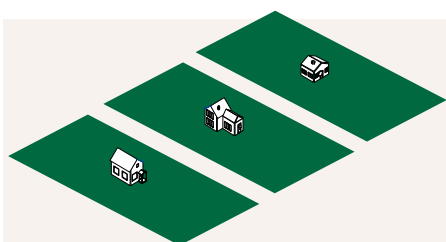
Allotment Size and Residential Densities (Section 4.2)

With the number of dwellings to achieve the growth scenarios having been estimated based on the predicted average household size of 2.5 persons, consideration needs to be given to the spatial implications of demand for this number of dwellings. The spatial requirements are based on the distribution of allotment sizes (with an allowance for the land requirements for public infrastructure and community facilities).

To cater for future demand, residential development at the following average allotment sizes are recommended, spread across various locations:

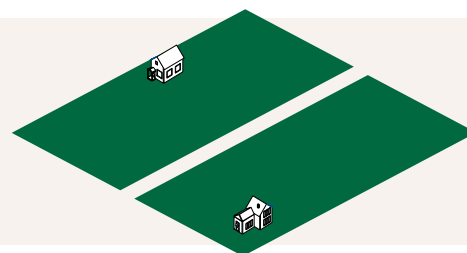
800m²

for potential residential sized allotments in growth areas adjoining the City of Mount Gambier and inner townships with Community Wastewater Management System/Sewer availability (Tarpeena and Allendale East).



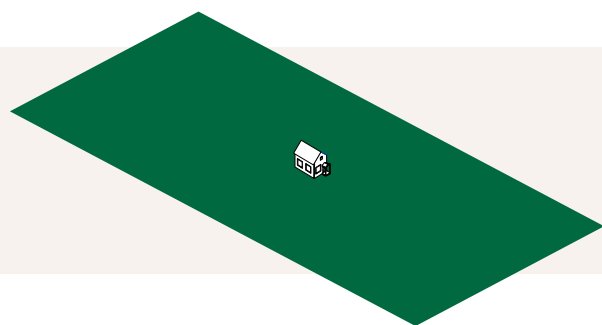
1,300m² - 2,000m²

for housing on larger allotments in more visually open rural settings, (but without the extent of land requiring ongoing maintenance of a larger rural living area).



3,000m²

for a large lot residential option, with an allotment size typically enabling on-site wastewater disposal.



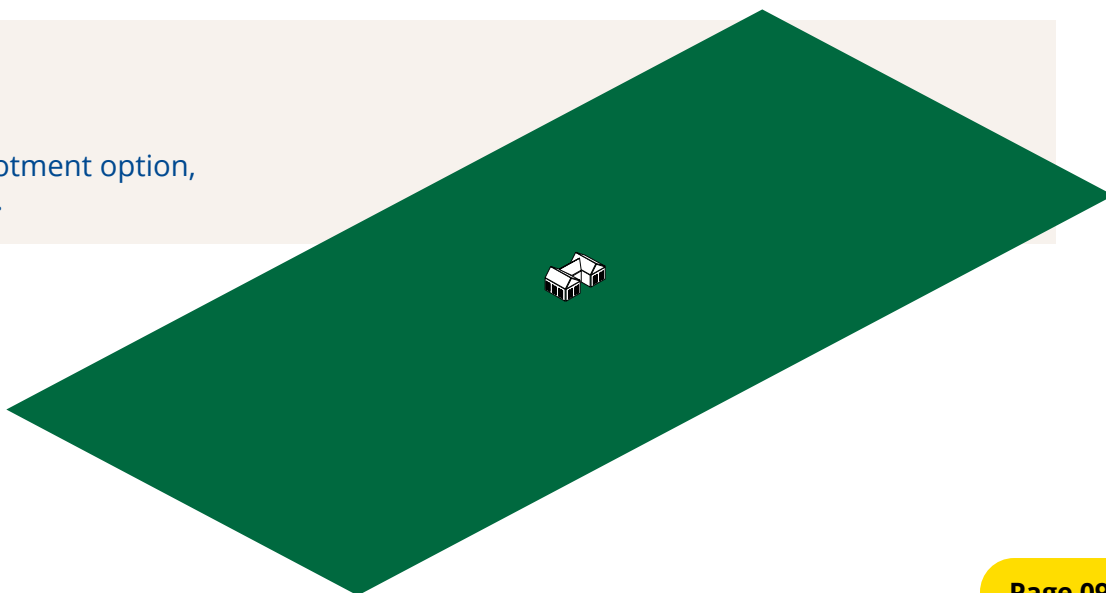
5,000m²

for a mid-range allotment size which accommodates a small rural living allotment option.

10,000m²

for a larger rural living allotment option, with more spacious living.

It is anticipated that demand will be highest for the smaller allotments (800 square metres, 1,300 – 2,000 square metres and 3,000 square metres) which are likely to be available closer to Mount Gambier and in existing, established townships.





Following review of all township options within the District Council of Grant, including careful review and evaluation of previous studies, in particular the Rural Living and Township Zones Boundaries Review and Master Plan, the following key township priorities have been modelled on the basis of their capacity to accept more significant levels of growth over the short, medium and longer term.

- Allendale East (**Section 4.8.1**)
- Kongorong (**Section 4.8.4**)
- Yahl (**Section 4.8.2**)
- Compton (**Section 4.8.5**)
- Tarpeena (**Section 4.8.3**)

Coastal and River Townships (**Section 4.8.6**) that were initially considered in the Rural Living and Township Zones Boundaries Review and Master Plan have also been reviewed, and their growth opportunities are included on the basis of the figures modelled in the previous studies. These townships and settlements include:

- Blackfellows Caves
- Nene Valley
- Cape Douglas
- Pelican Point
- Carpenter Rocks
- Racecourse Bay
- Donovans
- Eight Mile Creek to Brown Bay.

Port MacDonnell (**Section 4.8.7**) has also been reviewed, however, growth opportunities are limited to a small number of undeveloped sites already zoned for residential development.





Rural Living

Rural Living allotments have been popular in the District Council of Grant for a long time, and this form of development contributes substantially to the character of the district. Rural living type development and allotments provide a distinct separation from the more urban forms of development which are found in neighbouring City of Mount Gambier.

Further consideration has been given to both infill in existing townships and settlements, and to some logical extensions of existing Rural Living areas:

- Worrolong Rural Living Area (**Section 4.8.8**)
- Suttontown A Rural Living Area (Princes Highway) (**Section 4.8.9**)
- Suttontown B Rural Living Area (Pinehall Avenue) (**Section 4.8.10**)
- Compton A Rural Living Area (Illman Road) (**Section 4.8.11**)
- Mil Lel B Rural Living Area (Sherwin Road) (**Section 4.8.12**)

Compton (Section 4.9.1)

The Compton area has two significant opportunities that are already zoned for residential development. One area (the site of the previously proposed Mount Percy Golf Course residential development) is zoned Neighbourhood; and the other; is zoned Rural Living (this area is adjacent land in the City of Mount Gambier which is also zoned for Rural Living) and has been partially subdivided. Neither area is well serviced by infrastructure and recent land divisions have typically created allotments between 3,000 square metres and 5,000 square metres.

Three (3) options have been considered in the modelling for these parts of Compton:

1. Potential allotment yield and population growth using an average of 3,000 square metre allotments, based on the current lack of infrastructure in the area.
2. Potential allotment yield and population growth using an average of 1,800 square metres (achieved via a range of allotment sizes between 1,300 square metres and 3,000 square metres) with infrastructure including reticulated water and wastewater at a minimum.
3. Potential allotment yield and population growth using 800 square metre allotments, based on infrastructure being significantly upgraded and considering the Minister's current position on introducing additional areas zoned for Rural Living.

Residential Growth Recommendations (Section 4.9)

The provision of more spacious residential allotment types is considered to be an important point of difference between the lifestyle available in District Council of Grant and more suburban, and urban, Mount Gambier.

As a result of this work a number of recommendations have been presented for Council's consideration, including the potential to initiate Code Amendments to facilitate desired zoning changes.

Note: Code Amendments of this scale and complexity generally take approximately 18 months to two years to complete, including a formal consultation period of at least six weeks with affected property owners.

Subject to further consultation with landowners, and support of the State Planning Commission, these could include:

1

Rezone land at Allendale East from Rural Living Zone to Township Zone and adjust the minimum site area for the Township Zone to 800 square metres.

2

Decrease the minimum site area for the Rural Living Zone at Allendale East to 1,300 square metres.

3

Rezone land at Yahl from Rural Horticulture Zone and Rural Zone to Township Zone.

4

Rezone two small areas at Tarpeena from Rural Zone to Township Zone and adjust the minimum site area in the Township Zone to 800 square metres or 1,300 square metres depending on location.

5

Rezone land at Worrolong from Rural Zone to Rural Living Zone with a minimum site area of 1.0 hectare.

6

Rezone land at Suttontown B from Rural Living Zone to Rural Neighbourhood Zone with a minimum site area of 3,000 square metres.

7

Rezone land at Mil Lel B from Rural Zone to Rural Living Zone with a minimum site area of 1.0 hectare.

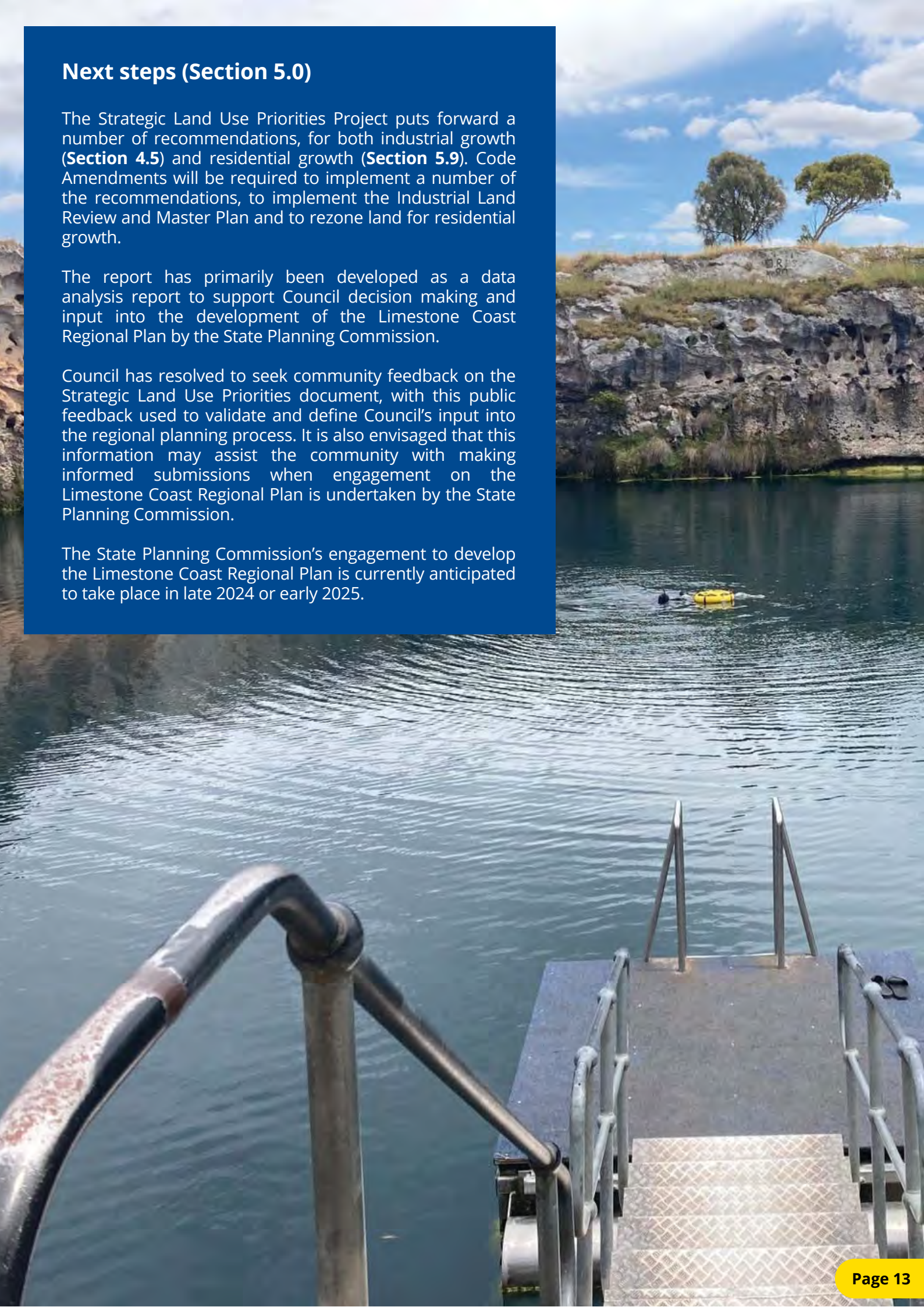
Next steps (Section 5.0)

The Strategic Land Use Priorities Project puts forward a number of recommendations, for both industrial growth (**Section 4.5**) and residential growth (**Section 5.9**). Code Amendments will be required to implement a number of the recommendations, to implement the Industrial Land Review and Master Plan and to rezone land for residential growth.

The report has primarily been developed as a data analysis report to support Council decision making and input into the development of the Limestone Coast Regional Plan by the State Planning Commission.

Council has resolved to seek community feedback on the Strategic Land Use Priorities document, with this public feedback used to validate and define Council's input into the regional planning process. It is also envisaged that this information may assist the community with making informed submissions when engagement on the Limestone Coast Regional Plan is undertaken by the State Planning Commission.

The State Planning Commission's engagement to develop the Limestone Coast Regional Plan is currently anticipated to take place in late 2024 or early 2025.



Get Involved

The Strategic Land Use Priorities Project document and supporting documentation is available to view on Your Say DCG.

You can view the report, and have your say:

- Complete the online feedback form at: yoursaydgc.com.au/strategic-land-use-priorities
- Email feedback to info@dcgrant.sa.gov.au
- Submit a hard copy feedback form or correspondence to:
 1. Principal Office: 324 Commercial Street West, Mount Gambier
 2. Port MacDonnell Community Complex: 5-7 Charles Street, Port MacDonnell
 3. Post to: PO Box 724, Mount Gambier SA 5290.

Hard copies of the Strategic Land Use Priorities Project and feedback form are available at Council's Principal Office and Port MacDonnell Community Complex.

Do you have questions about the Project? Submit your query on the project page via Your Say DCG for Council staff and MasterPlan to answer in video form.

Council staff are also contactable at the Principal Office on (08) 8721 0444 or info@dcgrant.sa.gov.au and/or by appointment at the Port MacDonnell Community Complex.

Feedback will be accepted until 5.00pm Monday 29 April 2024.

Appendix

Strategic Land Use

Priorities Plan Online Survey

Strategic Land Use Priorities

Your Say DCG

Strategic Land Use Priorities Project Feedback Form

Thank you for your interest in the Strategic Land Use Priorities Project.

The following questions are a guide only and are intended to find out your thoughts and opinions on the data, analysis and recommendations contained in the Strategic Land Use Priorities Project Report. This feedback form includes questions in three sections titled: Employment Growth, Residential Growth and Limestone Coast Regional Plan.

General comments may be provided to Council via email info@dcgrant.sa.gov.au or in the General Comments section within this form.

Please note any personal information submitted will not be made public. Council staff and consultants will not contact those who submit feedback unless clarification is required.

Name of person completing this feedback form

Contact phone number

Email address

Please indicate which category best describes your link to land in the District Council of Grant (selected one option only)

(Choose any 1 options) (Required)

- ☐ District Council of Grant Resident
- ☐ Non-resident District Council of Grant Landowner
- ☐ Business owner in the District Council of Grant
- ☐ Government Agency (Local or State)
- ☐ Other (please specify)

Please specify your main interest in the Strategic Land Use Priorities Project (selected one option only)

(Choose any 1 options)

- ☐ Residential Zoning (only)
- ☐ Industrial Zoning (only)
- ☐ Both Residential and Industrial Land Supply

Strategic Land Use Priorities

Your Say DCG

Residential Growth

This part of the project focused on residential growth modelling to determine the amount of land required to house an increased future population in the Council area.

What do you believe are the key challenges that come with increasing the resident population in the Council area?

(Choose all that apply)

- ☐ Housing affordability (both rental and home ownership options)
- ☐ Infrastructure is still undeveloped (i.e. Water, Sewer, Electricity, Road Network)
- ☐ Lack of housing diversity (i.e. dwelling types, allotment sizes)
- ☐ Lack of essential services (i.e. schools, medical services, community services)
- ☐ Conflict between residential development and primary production activity (i.e. fragmentation of productive land, interface with cropping activities or/or management of animals)
- ☐ Other
- ☐ Provide further comment below:

The Strategic Land Use Priorities Project report anticipates that residential allotments that are larger than 5,000 square metres in area, are likely to be less in demand. Do you agree?

(Choose any 2 options)

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☐ Provide further comment below:

After reviewing the Growth Modelling contained in the Strategic Land Use Priorities Project report, where do you prefer to see residential growth occur? (tick all that apply)

(Choose all that apply)

- ☐ Allendale East
- ☐ Coastal and River Townships
- ☐ Compton
- ☐ Compton A Rural Living Area (Illman Road)
- ☐ Kongorong
- ☐ Mil Lei B Rural Living Area (Sherwin Road)
- ☐ Port MacDonnell
- ☐ Suttontown A Rural Living Area (Princes Highway)
- ☐ Suttontown B Rural Living Area (Pinhall Avenue)
- ☐ Worrolong Rural Living Area
- ☐ Yahl
- ☐ Other
- ☐ Provide further comment below:

Strategic Land Use Priorities

Your Say DCG

Do you support the Residential Growth recommendations contained in the Strategic Land Use Priorities Project report?

(Choose all that apply)

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☐ Provide further comment below:

Employment Growth

This part of the Strategic Land Use Priorities Project focused on reviewing the supply of land zoned for industrial development throughout the Council area.

Do you believe the recommendations contained in the report allow for sufficient industrial land, for the next 15 – 30 years?

(Choose any 1 options)

- ☐ Yes
- ☐ No
- ☐ Other (please specify)

What do you believe are the key challenges, if any, that currently hold back the development of industrial land in the Council area? (tick all that apply)

(Choose all that apply)

- ☐ Land is in the wrong location (i.e. topography, interface with residential land, lack of access)
- ☐ Limitations with Transport/ Freight routes (i.e. Heavy Vehicle routing)
- ☐ Infrastructure is still undeveloped (i.e. Water, Sewer, Electricity, Road Network)
- ☐ Access to skilled workers
- ☐ Lack of housing for workers
- ☐ Other (please specify)

Which industries do you believe are growing (or have the potential to grow) in the District Council of Grant area?

Strategic Land Use Priorities

Your Say DCG

In relation to the question above, do the recommendations contained in the Strategic Land Use Priorities Project report cater for such industries?

(Choose any 2 options)

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☐ Provide further comment below:

In principle, do you broadly support the Council's proposal for a Regional Industrial Park at Glenburnie (near the existing Mount Gambier & Districts Saleyards)?

(Choose any 2 options)

- ☐ Yes
- ☐ No
- ☐ Don't know
- ☐ Provide further comment below:

Do you have any general comments on the Strategic Land Use Priorities Project Outcomes and Recommendations?

Strategic Land Use Priorities

Your Say DCG

Limestone Coast Regional Plan

The State Planning Commission is currently undertaking a review of the Limestone Coast Regional Plan.

What do you believe are the key priorities that Council should be presenting to the State Planning Commission on behalf of residents?

Appendix

Moorak Estate

Code Amendment Letter

Hon Nick Champion MP



**Government
of South Australia**

Minister for Trade and
Investment

Minister for Housing and
Urban Development

Minister for Planning

GPO Box 11032
ADELAIDE SA 5001

T: (08) 8235 5580

E: ministerchampion@sa.gov.au

22EXT0216

EHomes Pty Ltd
C/- Frank Brennan
Frank Brennan Consulting Services

By email: frank@fbcs.com.au

Dear Mr Brennan

I write to advise that under section 73(2)(b)(vii) of the *Planning, Development and Infrastructure Act 2016*, I have considered the advice of the State Planning Commission and have resolved to not support the Proposal to Initiate the Moorak Estate Code Amendment.

I note that the subject land forms part of a larger rural living zone in close proximity to the City of Mount Gambier. Whilst I note that the proposal seeks to explore the application of the Neighbourhood Zone, the level of density sought is more akin to that expected in the Rural Living Zone. As it stands, I consider that the proposal does not encourage the orderly expansion of the urban area and am of the view that the future densification should be explored by the District Council of Grant and the City of Mount Gambier as part of the regional planning process currently underway.

For further information, please contact Ms Catherine Hollingsworth from Planning and Land Use Services, Department for Trade and Investment, on 0457 837 760 or via email at catherine.hollingsworth@sa.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Nick Champion".

Hon Nick Champion MP
Minister for Planning

28 / 10 / 2022





Attachment 4

Memorandum

Strategic Land Use Priorities

Memorandum

Attention	Mr Darryl Whicker
Organisation	District Council of Grant
From	Michael Richardson
Reviewed by	Kirsten Falt
Subject	Strategic Land Use Priorities Project – Status and Next Steps
Date	3 July 2024
Job No.	53133

Background

The District Council of Grant has undertaken the Strategic Land Use Priorities Project, which has analysed the spatial opportunities for future commercial and residential development in the Council area. Following preparation of the final report, Council has undertaken community consultation in accordance with its relevant policies and procedures. The feedback received during the community consultation process has been summarised in a 'What We Heard' report.

Following preparation of the 'What We Heard' report, a further workshop with Elected Members and the consultant team who have prepared the Strategic Land Use Priorities Project report was held on Thursday 20 June 2024. The purpose of this workshop was to review the community feedback received during the consultation process, and to discuss those issues which still required further consideration. Based on the outcomes of that Elected Member workshop, some minor updates were made to the Strategic Land Use Priorities Project report and the What We Heard report, such that they are suitable for Council to consider for adoption.

Most recommendations in the Strategic Land Use Priorities Project report, as was presented for community consultation remain unchanged.

This memorandum is intended to support the report to Council for formal consideration and adoption of the Strategic Land Use Priorities Project report. Once Council has adopted the report, it is intended that the contents of this memo can form the basis of a brief for presentation to PlanSA staff and the State Planning Commission, for inputting into the Limestone Coast Regional Plan.



SLUPP Recommendations

The Strategic Land Use Priorities Project made recommendations in respect of employment lands (supporting industrial and commercial development) and residential development.

In respect to employment lands, the Strategic Land Use Priorities Project report recommends:

1. Retain Millicent Road Policy Area 1.
2. Rezone Mount Schank Policy Area 2 to Primary Production Zone.
3. Retain the Northern Gateway Policy Area 3 and extend it to the west, subject to further investigations.
4. Rezone two portions of Penola Road Policy Area 4 to Primary Production Zone.
5. Retain the three portions at Port MacDonnell Policy Area 5 and consider options for further development of the Boat Yard portion (including an extension to the west).
6. Retain the eastern portion of Tarpeena Policy Area 6 (Timberlink Australia site) and rezone the western portion that accommodates forest plantation and electricity transmission lines to Primary Production Zone.
7. Amend policy in the Airfield Zone at Mount Gambier Airport to loosen the nexus between light, service industry and warehousing with aviation activities and allow for a broader range of employment uses.
8. Work with the State Planning Commission to include relevant policy in the Limestone Coast Regional Plan that will support implementation of the ILR (Industrial Land Review and Master Plan) recommendations, in particular, the recommended rezonings.
9. Support the preparation of a business case by Regional Development Australia Limestone Coast proposing a new intermodal terminal just to the north-east of the Saleyards, to facilitate movement of freight by rail (as opposed to by road), to the Port of Portland, Melbourne, Adelaide and elsewhere in Australia. The business case will be put to Infrastructure Australia to secure support and funding.
10. Investigate the creation of a Regional Industrial Park at Glenburnie adjacent to the Saleyards that builds on the success of the Saleyards operations, and which will be able to support and capitalise on the opportunity an intermodal terminal could provide.
11. Monitor the implications of the closure of the Millicent Saleyards and consider the specific implications for the Glenburnie Saleyards.
12. In conjunction with relevant stakeholders identify a suitable location for a precinct to accommodate coastal crayfish processing operations at Port MacDonnell. Council may wish to consider the Boat Yard site as a potential location, consistent with the recommendations of the Industrial Land Review. Inclusion of a visitor facility and restaurant would create the opportunity to expand the business.



In respect to residential development, the Strategic Land Use Priorities Project report recommends:

1. Rezone land at Allendale East from Rural Living Zone to Township Zone and adjust the minimum site area for the Township Zone to 800 square metres.
2. Decrease the minimum site area for the Rural Living Zone at Allendale East to 1,300 square metres.
3. Rezone land at Yahl from Rural Horticulture Zone and Rural Zone to Township Zone.
4. Rezone two small areas at Tarpeena from Rural Zone to Township Zone and adjust the minimum site area in the Township Zone to 800 square metres or 1,300 square metres depending on location.
5. Rezone land at Worrolong from Rural Zone to Rural Living Zone with a minimum site area of 1.0 hectare.
6. Rezone land at Suttontown B from Rural Living Zone to Rural Neighbourhood Zone with a minimum site area of 3,000 square metres.
7. Rezone land at Mil Lel B from Rural Zone to Rural Living Zone with a minimum site area of 1.0 hectare.

In respect of land at Compton, the Strategic Land Use Priorities Project report modelled three density outcomes, noting that a determination on which outcome was preferred would be delayed until the community consultation had been completed.

Consultation Outcomes

The outcomes of the consultation on the Strategic Land Use Priorities Project are set out in the 'What we Heard Report'.

In respect of Employment Growth Respondents were asked to identify from a list, the key challenges that currently hold back the development of industrial land in the Council area. Key challenges ranked (highest to lowest number of responses received), are shown in **Table 1** below:

Table 1 Key Challenges to Development of Industrial Land

Rank	
1	Infrastructure is still undeveloped (i.e. water, sewer, electricity, road network).
2	Access to skilled workers.
2	Lack of housing for workers.
3	Land is in the wrong location (i.e. topography, interface with residential land, lack of access).
3	Limitations on Transport/Freight routes (i.e. Heavy Vehicle routing).



Other challenges identified by respondents can be broadly summarised as follows:

- Upgrade roads along heavy vehicle (B-Double) freight routes to assist businesses in delivering and receiving their products and services more efficiently.
- Improve access to reliable mobile coverage (address gaps in coverage) to improve digital connectivity in the region including for those travelling arterial roads.
- Improve access to fast, reliable and affordable internet services.
- Increasing freight costs undermining competitiveness and ability to scale.
- High prices for regional flights (needs to be more cost-effective to travel by air).
- Lack of affordable and quality housing.

In Respect of Residential Growth

Respondents were asked to identify from a list, the key challenges that come with increasing resident population in the Council area. Key challenges, ranked (highest to lowest number of responses received), are shown in Table 2 below:

Table 2 Key Challenges to Residential Growth

Rank	
1	Conflict between residential development and primary production activities (i.e. fragmentation of productive land, interface and cropping activities and/or management of animals).
2	Lack of housing diversity (i.e. dwelling types, allotment sizes).
2	Lack of essential services (i.e. schools, medical services, community services).
3	Housing affordability (both rental and home ownership options).
3	Infrastructure is still undeveloped (i.e. water, sewer, electricity, road network).

Other challenges identified by respondents can be broadly summarised as follows:

- Strategic Land Use Priorities Project report does not set an ambitious target; requires ambitious targets for long-term planning for growth.
- All business needs a population base to sustain and grow with confidence.
- Poor quality builds.
- Fragmentation of productive land.
- Maintain the City-Country feel.
- 5,000 square metres allotments are what is in demand and should be the minimum allotment size in Compton.
- Large allotments (low-density) for residential living is unsustainable.
- Allotments in Compton should be no less than 5,000 square metres.

Issues For Consideration

The majority of the recommendations in the Strategic Land Use Priorities Project report were supported by the feedback received during the community consultation process.



Having regard to the feedback received during the consultation process, and additional feedback received from the City of Mount Gambier administration, the following items were outstanding for further consideration prior to adoption of the Strategic Land Use Priorities Project report.

1. Compton density and character.
2. Lake Terrace East employment lands expansion.
3. Yahl expansion.

Discussion on each of these issues is set out in the following sub-sections.

Compton Density and Character

The future development of land at Compton has been subject of significant review and consideration by Council and interest by stakeholders and the community over a period exceeding a decade. A series of strategic and policy changes over time has resulted in a spatial planning arrangement on the western edge of Mount Gambier which are convoluted and have resulted in the area developing in a piecemeal fashion with limited infrastructure. This presents a significant series of risks for poor planning, development and environmental and social outcomes.

At the present time a Rural Living Zone with a minimum allotment area Technical and Numeric Variation (TNV) of 5,000 square metres is located at the boundary of the City of Mount Gambier and District Council of Grant. Beyond this is located a Neighbourhood Zone with a minimum allotment size TNV of 450 square metres, before a transition back to a Rural Living Zone along Caferperco Road. The land is the Neighbourhood Zone, with a minimum allotment size TNV of 450 square metres was envisaged to be developed as an integrated Golf Course Estate under the Grant Council Development Plan (now revoked). The Golf Course Estate project however did not progress and the requirement for integrated development around a golf course was lost in the transition from the Grant Council Development Plan to the Planning and Design Code, leaving just a Neighbourhood Zone.

Whilst the need for reticulated water and wastewater infrastructure has limited the ability of land in the Neighbourhood Zone to be developed for residential sized allotments, a number of divisions for allotments in the range of 3,000 to 5,000 square metre have progressed, fragmenting the land and creating the risk of uncoordinated resubdivision.

The transition from urban forms of development to lower density residential and then rural land on the edge of the city should be clear and structured. The current situation is almost the complete reverse of this and should be corrected as soon as possible to minimise the risk of further undesirable outcomes.

In the correspondence from the Minister for Planning to the proponent of the Moorak Estate Code Amendment (declined), the Minister stated:



I note that the subject land forms part of a larger rural living zone in close proximity to the City of Mount Gambier. Whilst I note that the proposal seeks to explore the application of the Neighbourhood Zone, the level of density sought is more akin to that expected in the Rural Living Zone. As it stands, I consider that the proposal does not encourage the orderly expansion of the urban area and am of the view that the future densification should be explored by the District Council of Grant and the City of Mount Gambier as part of the regional planning process currently underway.

Noting the historic pattern of development in the area, the following is evident. There are:

- A number of undivided strategic allotments (4 hectares or more) remaining as opportunities for future division;
- A broad range of allotment sizes that range in size from as small as 700 square metres, to 3,000 to 5,000 square metres;
- Some larger allotments in the 6,000 – 8,000 square metres; as well as
- A smaller number of allotments in the 1-hectare to 4-hectare range.

In assessing the character of the Compton area in the Rural Living Zone and Neighbourhood Zone, it can be described as a broad, generally open large lot residential area with a mixture of Rural Living, Rural Neighbourhood and a small number of Residential sized allotments. The area is almost exclusively detached dwellings, some of which have significant vegetation, interspersed with more open areas, particularly on the residual allotments greater than 1.0 hectares in size.

It is observed that the open character is, in a significant part, a function of the land division potential which currently exists not having been fully taken up, with additional yield of in excess of 500 dwellings existing under the current policy (even without assuming urban size allotments in the Neighbourhood Zone). If this available yield under the existing policy was exploited to a greater degree, it is certain that the character of the area would be materially different to the present.

Our assessment of the Minister's reasons for refusal of the Moorak Estate Code Amendment is that the density was insufficiently high, and that the area should be developed at more urban densities. With due respect to the Minister, State Planning Commission and Department, we disagree with such an assessment. The average allotment size proposed by the Moorak Estate Code Amendment was in the order of 2,000 square metres, with a mix of allotment sizes between around 1,400 square metres and 3,000 square metres envisaged. The allotments were to be served with reticulated water and wastewater. We do not consider this to be a level of density 'akin to a Rural Living Zone'.



Feedback from the City of Mount Gambier in respect of this issue indicated a level of support for future residential development which would form an 'edge' to the city, with development occurring in an orderly and coordinated manner. It was suggested that development would be best suited by a form of Residential/Rural Living type allotments that enables a gradual transition from the city to primary production land beyond. The importance of allotments being connected to reticulated water and wastewater was also highlighted.

In the Strategic Land Use Priorities Project report, three scenarios for the growth of Compton were envisaged:

- Option A – 3,000 square metre average allotments – representing approximately the average of recent development proposals in the area.
- Option B – 1,800 - 2,000 square metre average allotments - representing approximately the outcome proposed in the Moorak Estate Code Amendment.
- Option C – 800 square metre allotments – representing an urban outcome within a neighbourhood zone.

A SWOT analysis has been undertaken for each option and is presented in the following tables.

Table 3 SWOT Analysis – Option A

Strengths • Minimal policy change from current position • Least change to existing character (but will still be material) • Feedback suggests Option A is supported by the City of Mount Gambier	Weaknesses • Uncoordinated land divisions occur over time • Inappropriately small divisions in former Golf Course Estate Neighbourhood Zone • Proliferation of on-site wastewater disposal with hundreds of additional systems • Correspondence from the Minister for Planning to the proponent of the Moorak Estate Code Amendment (declined) suggests that the Minister seeks greater density residential development as an expansion to the urban area of City of Mount Gambier
Opportunities • Limited calls on Council provision of infrastructure in short term	Threats • Lack of coordination • Impact on groundwater resources • Future pressure for policy change likely to endure



Table 4 SWOT Analysis – Option B

Strengths • Clear policy change pathway to align whole of Compton in single Rural Neighbourhood Zone • Provides for moderate level of population growth • Balances character with infrastructure provision opportunity	Weaknesses • Not supported by a group of existing residents
Opportunities • Provides opportunity for infrastructure serviced land division to be developed by private sector • Coordinated development maximises ability to manage character to controls on public realm, fencing and open space	Threats • Ongoing incremental land division will compromise outcomes if resolution not reached in a timely manner

Table 5 SWOT Analysis – Option C

Strengths • Largest potential population growth	Weaknesses • Will result in the largest change to existing character • Will result in the greatest potential for land use conflict and interface issues • No realistic pathway to achieving density outcome in existing divided areas • Will compete with similar development typologies in City of Mount Gambier • Feedback suggests that the Option C is not supported by the City of Mount Gambier or community. s
Opportunities • None identified	Threats • Unlikely to engender broad community support • Resource overhead to coordinate infrastructure provisions will be significant • Likely to result in a large number of uncoordinated applications for resubdivision of existing allotments



The existing pattern of development in the Compton area has evolved over time and reflects a variety of approaches to the division of land and provision of infrastructure. Under existing policy, significant opportunity for additional development remains, however; this will continue to occur in a largely uncoordinated, piecemeal fashion and likely be serviced through an ongoing proliferation of on-site wastewater disposal systems.

It is considered that doing nothing, or delaying further consideration of policy outcomes is not an acceptable solution and will result in greater risk of poor outcomes.

In considering a preferred option, it is considered that the area transitioning to residential densities (less than 800 square metre allotments) should be excluded. The existing area is too fragmented and the infrastructure coordination to achieve residential development densities across hundreds of existing allotments is not considered realistic. Such an outcome would result in a dramatic change to character of the area and is considered unlikely to engender significant support from the community.

Recognising that Council is not the decision maker in future zoning outcomes, but rather is a key stakeholder providing input to the Minister and State Planning Commission, an appropriate path forward at this time is to seek to further engage with the benefit of the information that has been gained during the preparation of the Strategic Land Use Priorities Project and the subsequent community consultation.

In seeking to engage on these issues to find a suitable policy outcome for the Compton area, a sensible position for Council to adopt is considered to be as follows:

- Council recognises the role of the Minister and State Planning Commission in the preparation of the Limestone Coast Regional Plan;
- Council has considered the extensive feedback including from the Minister in respect of the Moorak Estate Code Amendment, key stakeholders and the community;
- Council has considered growth scenarios for the future of the District Council of Grant comprehensively on a Council-wide basis in the Strategic Land Use Priorities Project;
- The current policy for the Compton area is inconsistent with good planning outcomes, and is failing to prevent the continued fragmentation of the land by division into allotments not consistent with policy requirements;
- The current policy does not provide a framework for the coordination of infrastructure, and will continue to result in a proliferation of on-site wastewater disposal systems;
- The current policy will not prevent the ongoing change of the character of the area through resubdivision to achieve existing development opportunities;
- An improved policy framework would provide consistent guidance on average and minimum allotment sizes, matched with required infrastructure provision and requirement for urban design outcomes to achieve desired character outcomes, particularly for larger land divisions.



Whilst the exact minimum allotment sizes will be determined through the process, the outcome modelled in Option B is considered to represent the best balance between achieving efficient use of the available land, preserving desired character outcomes and providing opportunities for reticulated infrastructure for water and wastewater.

Lake Terrace East Employment Lands Expansion

The opportunity for future employment lands on the southern side of Lake Terrace East have been considered during strategic reviews over an extended period. Existing employment lands exist on the northern side of Lake Terrace East within the City of Mount Gambier, and opportunity presented for a logical expansion to the south to provide further land supply.

Feedback from the City of Mount Gambier indicated that they were not supportive of expansion of employment lands in this location, citing issues including:

- Interface with sensitive receivers including residential development and educational facilities.
- Potential risks/impacts on groundwater resources from industrial/commercial uses.
- Loss of productive primary production land.

In reviewing the potential benefits and drawbacks of additional employment lands in this location, it is noted that the potential rezoning has been identified at a strategic level and has not been pursued by landowners or proponents of development on the identified land.

Having regard to the supply and demand for industrial land across the District Council of Grant, it is not considered that the Lake Terrace East will materially impact the adequate supply of future land. The issues highlighted in the feedback from the City of Mount Gambier do have merit, and whilst they would not necessarily rule out the use of the land for employment lands purposes, given the limited impact on overall employment lands supply and the lack of material demand to actually progress rezoning or development, it is considered reasonable for Council to not further pursue this land for future employment lands.

Yahl Expansion

The potential for expansion of residential development opportunity at Yahl has been considered by District Council of Grant in a number of strategic projects including the Rural Living and Townships Review (2019), the Inner Townships Master Plan (2023) and the Strategic Land Use Priorities project. Numerous landowners have approached Council over an extended period seeking to ascertain the opportunity for rezoning to provide for additional residential development opportunities.



It is recognised that expansion of Yahl would present some degree of challenge from an engineering and stormwater management perspective, and that some land in the vicinity of Yahl has high levels of agricultural productivity. However, there is no information to suggest that the engineering issues cannot be overcome (as they have been for existing development in Yahl), or that a moderate expansion contiguous with the existing township would materially impact the primary production capacity of the wider region.

Feedback from the City of Mount Gambier indicated that they were not supportive of expansion of employment lands in this location, citing issues including:

- Lack of services and facilities.
- Future expansion would entrench a vehicle dependant township.
- Loss of productive primary production land.

It is noted that feedback from the community during engagement on the multiple projects listed above, has typically supported a moderate level of further residential growth at Yahl, with opportunities for expansion having been identified to the south, east and west.

Modelling undertaken for Yahl in the Strategic Land Use Priorities Project indicated a maximum potential growth of 498 allotments and a population increase of 1,246 persons, this would represent a high-end scenario rather than a likely outcome.

Noting the feedback from the City of Mount Gambier, it is observed:

- Yahl already forms a hub of community activity as whilst there are no retail or other commercial activities, there is a thriving school, sporting facilities, community hall, public toilets and Country Fire Service facilities.
- Like almost everywhere in the Limestone Coast Region, including urban areas of the City of Mount Gambier, the almost complete lack of public transport services means the whole region is almost completely car dependant.
- Primary production land immediately adjacent Yahl is already compromised by the interface with the existing township and is not identified as being as productive as land located further to the west.

While the position expressed by the City of Mount Gambier is understood, it is considered that Yahl provides opportunity for a moderate expansion of residential development in a manner which achieves a high-quality residential environment, consolidated in an area where there is a significant level of community facilities and infrastructure.

If further development opportunities are prioritised immediately adjacent existing development, the potential exists to increase the number of allotments, whilst having the length of interface between residential development and primary production uses remain consistent with the current township boundaries.



It is considered appropriate to retain the proposal for the moderate approach of Yahl, undertaken in a manner that preserves the existing character, mitigates engineering and stormwater issues and mitigates the potential impact on adjacent primary production land.

Conclusion

With the exception of the items set out for further discussion in the preceding sections of this memorandum, the remainder of the recommendations as set out in the Strategic Land Use Priorities Project report remain as previously expressed.

It is recommended that Council proceed to receive the Strategic Land Use Priorities Project report, the 'What We Heard' report and this memo, and adopt the Strategic Land Use Priorities report, subject to the recommendations in respect of Compton, Lake Terrace East and Yahl as set out in this memo.

It is recommended that Council's CEO then proceed to engage with Planning and Land Use Services staff and the State Planning Commission, providing this information and seeking to meet and make presentations on the position of Council for the purpose of further informing the preparation of the Limestone Coast Regional Plan.

