

25 February 2020

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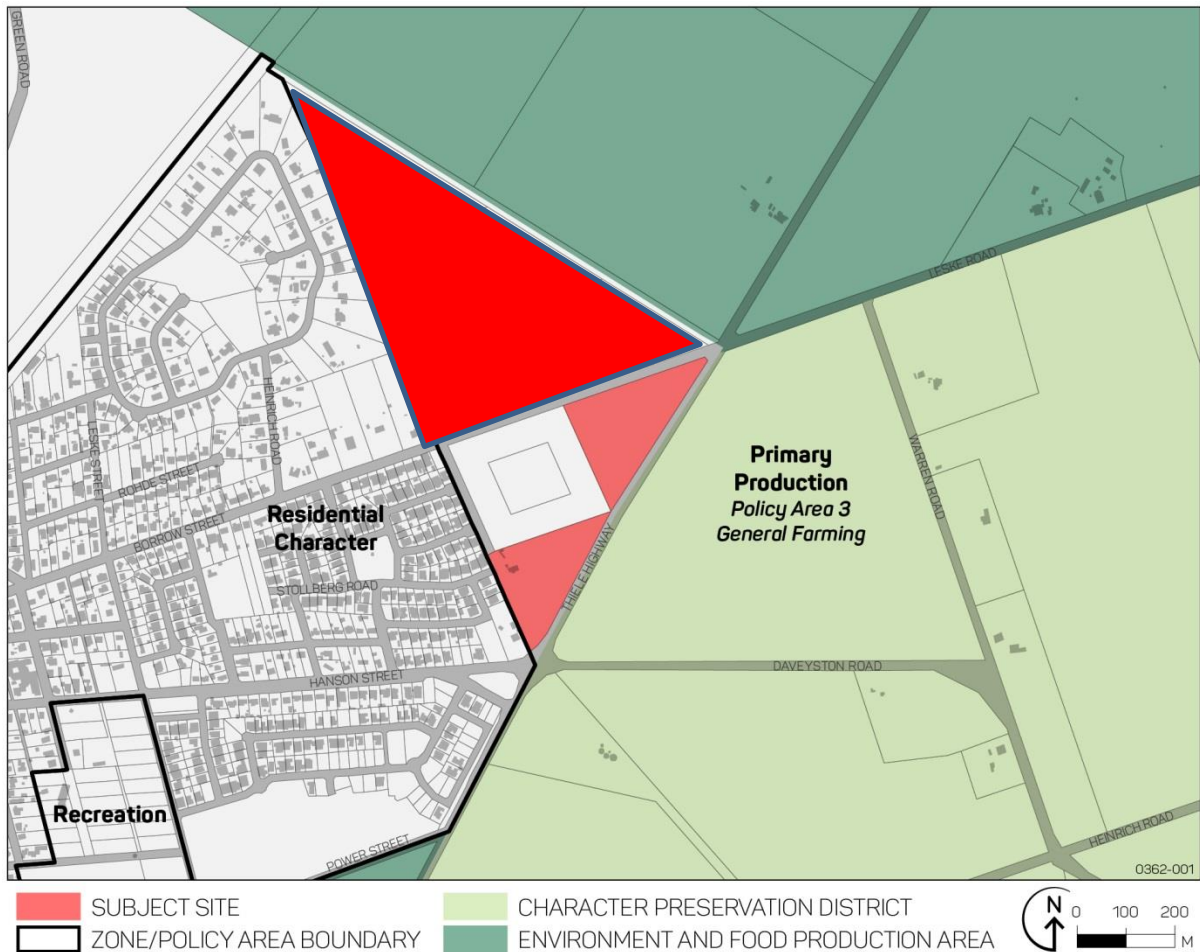
ABN 87 096 337 576

Mr M Lennon  
 Chair State Planning Commission  
 GPO Box 1815  
 ADELAIDE SA 5001

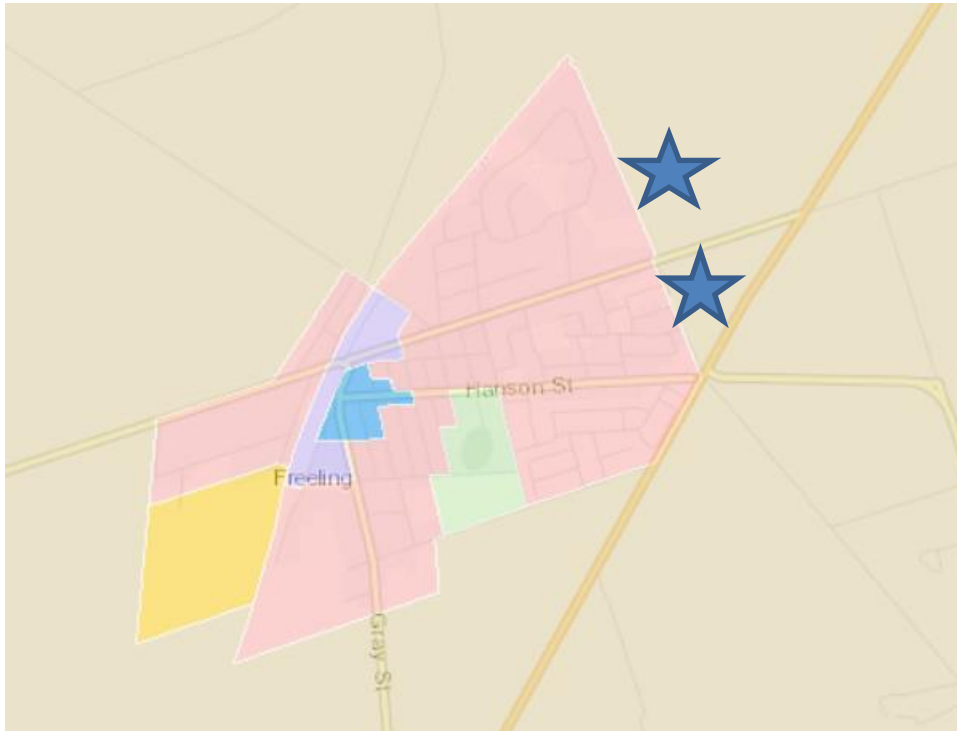
Dear Michael

Growth of Freeling

I have been engaged by Windy Acres Pty Ltd and the Leske family to prepare this submission on the draft Planning and Design Code, and specifically with regard to Piece Allotments 94 and 95 in Filed Plan 174514 located on Borrow Street and the Thiele Highway Freeling as well as Lots 523, 524, 530, 531 and 537 in HP160500 on the northern side of Borrow Street. The subject land is currently zoned Primary Production Zone. The draft PD Code proposes to zone the land Rural. The owners are seeking for the land to be rezoned to Suburban Neighbourhood as per the land to the west of the subject land. The subject land is shown in red on the plan below.



The proposed zones in the PD Code are shown on the plan below. The light brown is the Rural Zone. The two blue stars represent the locations of the Windy Acres and Leske land.



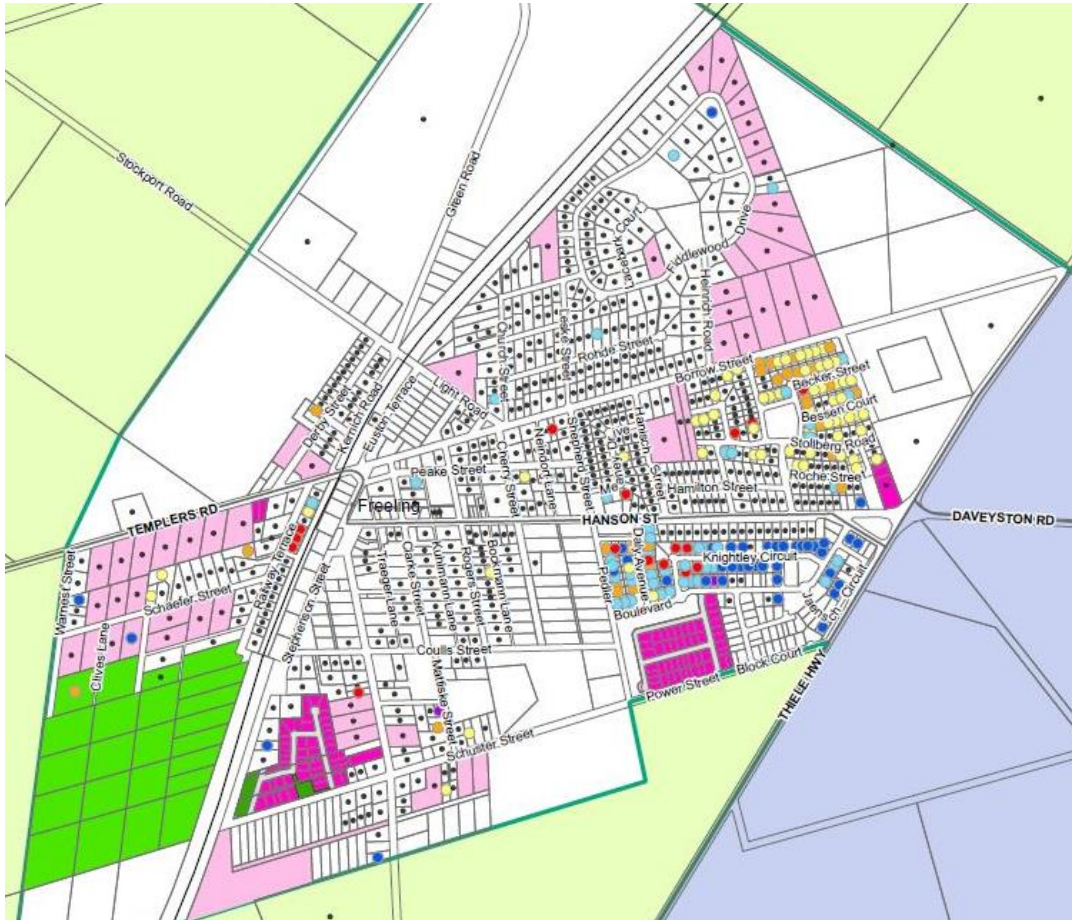
Within Freeling in the past few years new dwellings have been built in the range of 16 – 59 per annum. The average has been 37 per annum. The table on the following page utilises available data from DPTI (SA).

Year Built	Number of Dwellings
Pre 2011	566
2011	59
2012	27
2013	16
2014	45
2015	39

The plan below shows the following:



The bright pink allotments have been approved but are not yet titled.

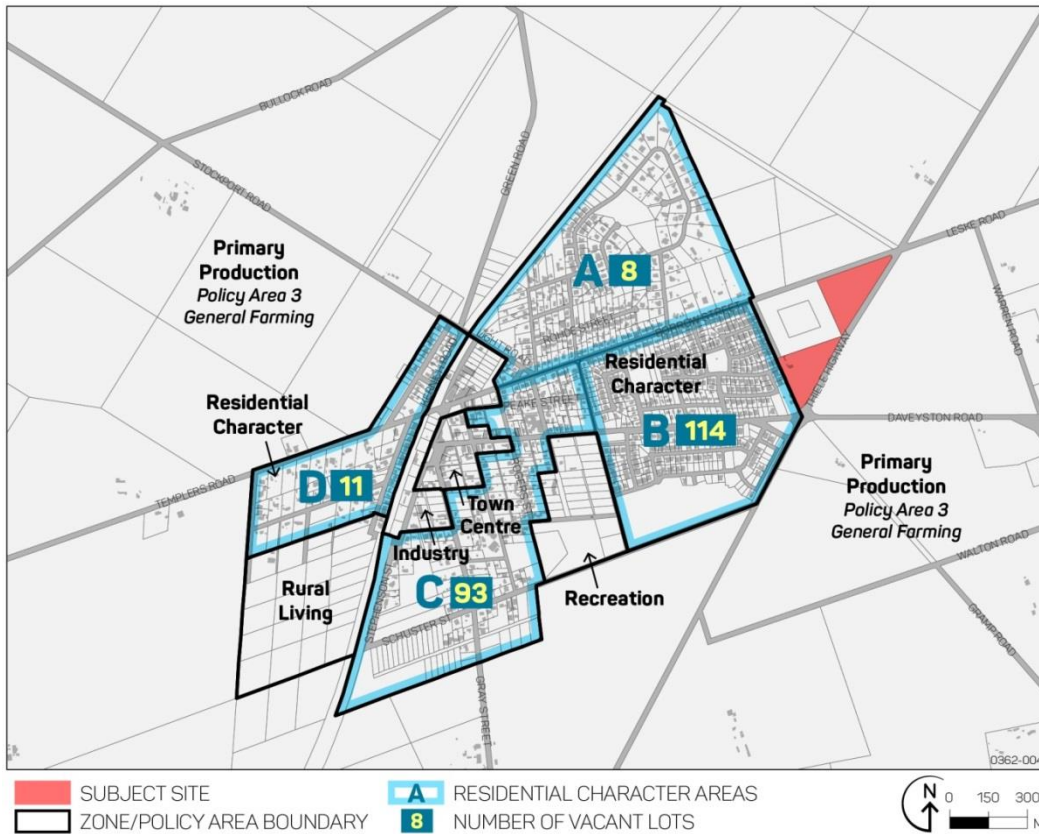


That part of Freeling that is currently zoned Residential Character has limited remaining development capacity. As of 26 November 2016 in the area north of Borrow Rd and east of Light Rd (marked A on the plan below) there were 8 vacant allotments which can have dwellings built upon them.

In the area south of Borrow Rd and east of the Freeling Recreation Park (marked B on the plan on the following page) there were 114 vacant allotments. Most of these allotments are in the Freeling Estate.

In the area west of the Freeling Recreation Street Park and east of the railway line (marked C on the plan below) there were 78 vacant allotments. In this area there is land that could be further developed to create in the order of 15 allotments.

In the area to the west of the railway line (marked D on the plan below) there were 11 vacant allotments.

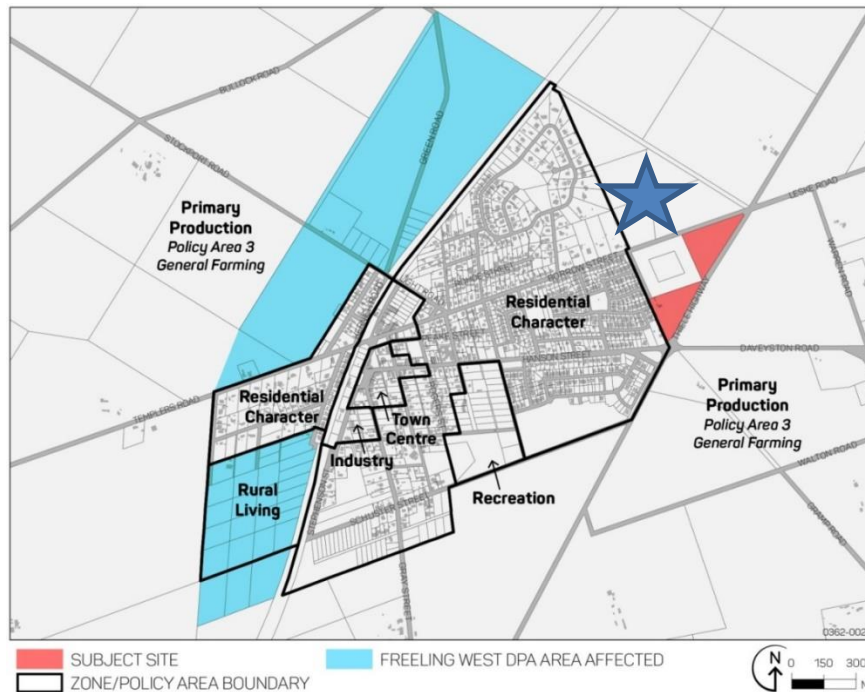


Thus, there were a total of 226 residential allotments that have or could be created as of November 2017. Note this does not include re-subdivision of existing larger allotments with existing dwellings or allotments within the Rural Living Zone.

On the basis that dwellings are built at the rate of 37 per annum and this occurred in the year since 26 November 2016 then there is 5.1 years supply as from the end of November 2017. However, not all allotments will be built upon as the landowners, for various reasons, will not develop. This is typically 10 - 15% of allotments. This leaves 2.5 years of supply as from February 2020 – which takes us to June 2022.

There is land in the Freeling township that is not affected by the Environment Food Protection Area (EFPA) and outside of the Character Preservation Area that remains zoned Primary Production and Rural Living. This land, including the subject land, but not including the cemetery land, amounts to approximately 148.7 hectares.

The Freeling (West) Residential DPA was placed on public exhibition in late 2012, but for various reasons was scrapped in 2014. The land affected by that DPA is shown on the plan on the following page.



The Windy Acres land along with the land (approximately 23 ha) owned by the Leske family on the north side of Borrow Rd (see blue star on the plan above) should be seriously considered for a minor expansion of Freeling that would enable some 230-270 dwellings to be built, which is about 6 years of supply.

A study of the future of Freeling was to be undertaken in 2014/15 along with the study for Kapunda. For various reasons the Freeling component of the study did not proceed, but the Township Futures – Kapunda study was undertaken.

Given the proposed Code Amendment process will take around a year to complete and it will September 2020 before the PD Code is introduced, there is a real possibility that there will be minimal residential allotments available for sale within a couple of years which may lead to a lack of supply price increase, which could be avoided. As such it is considered the subject land should be zoned Suburban Neighbourhood as part of the initial introduction of the PD Code.

Should you have any queries regarding this matter please do not hesitate to contact me at [REDACTED] or by phone on [REDACTED]

Yours sincerely  
STIMSON CONSULTING PTY LTD

JOHN STIMSON  
Managing Director