Dear Sir or Madam,

Submissions - Draft Planning and Design Code (Phase 2 - Rural Areas)

We act for SC Heinrich and Co Pty Ltd and the Heinrich family (collectively, "SCH") who collectively control allotments 5 and 530 Horrocks Highway, Stanley Flat (land).

The Department of Planning, Transport and Infrastructure (DPTI) has invited submissions about the draft Planning and Design Code for South Australia - Phase 2 (Rural Areas) (Draft Code) until 29 November 2019.

These submissions about the Draft Code are made on SCH’s behalf.

SCH’s position

In summary, SCH says that:-

1. given SCH’s depot use, the land should be incorporated in an Employment Zone or similar appropriate zone in the Code that supports depot uses;

2. if the land is not incorporated into an Employment Zone or similar appropriate zone, the proposed Rural Zone that is to apply under the Code is supported, subject to comments below;

3. the forms of Restricted Development for the Rural Zone are adequate and should not be further changed;

4. the Code should contain a land use definition of "private works depot" as follows:

   private works depot means land used for storage and operations connected with the provision of services including roadworks or earthmoving services or similar services by a body who carries out those services in trade or commerce.
5. the planning policies in the Code should recognise that privately-operated works depots are appropriately located in Rural Zones, provided that amenity and environmental issues are appropriately attended to.

SCH and its business operations

SCH is a family owned and operated earthmoving, quarrying and materials transport company which operates predominantly in the mid-north of South Australia.

SCH has been a long-standing business success and a source of employment and public infrastructure services to local and State government and the private sector for decades.

SCH has operated a "home base" and integrated depot facility for its business activities from allotment 5 since about 1981. Over that time, that facility has expanded as the business has grown.

The Development Plan vs the Code

The land is presently located in the Primary Production Zone and Horticulture Policy Area 2 of the Clare and Gilbert Valleys Development Plan.

The land is proposed to be located in a new Rural Zone according to the Draft Code. No Sub Zone applies, but the land but is subject to various overlays.

SCH's detailed submissions on the Code

Due to the unsatisfactory wording of the present Primary Production Zone in the Development Plan, my client has experienced serious difficulties upgrading and expanding its business operations at the land, despite its long-standing land use.

Accordingly, SCH strongly welcomes and supports the introduction of the new Rural Zone in its present draft form, subject to some suggested amendments to better support important depot facilities such as that operated by SCH in such areas.

We will make brief submissions about the Rural Zone provisions generally, before commenting on certain aspects of the balance of the draft Code.

Employment or similar zoning

SCH's primary submission is that given the longstanding historic use of the land (at least allotment 5) as a depot, it is appropriate that the land be rezoned to a sympathetic form of zoning, i.e., an Employment Zone, which encourages such a use.

Our client has previously made submissions about the incompatibility of the existing PPZ as part of the Clare and Gilbert Valleys Council's "Clare Township DPA" on 3 September 2018. A copy of those submissions is attached for your consideration.

SCH suggests that an Employment Zone would be an appropriate form of zoning to incorporate a depot use, noting that one of the Desired Outcomes (DOs) in that Zone is:

A comprehensive range of industrial, logistical, warehousing, storage, research and training land uses together with compatible business activities generating wealth and employment for the State.

SCH's land is in our submission, well suited to being incorporated into such a zone, particularly given the nature of its historical use, the lack of other suitably zoned land in Clare and its surrounds and the other reasons in our attached letter to the Council.
The Rural Zone

In general, and in the event that the land is not zoned to an Employment Zone or similar zone compatible with depot uses, SCH supports the rezoning of the land to a Rural Zone and the wording of the proposed new Rural Zone, subject to some comments and suggested amendments that follow.

My client strongly supports the new Desired Outcome 2 for the Rural Zone, which provides (with my underlining):

2 A zone supporting diversification of existing businesses that promote value adding, such as industry, storage and warehousing activities, the sale and consumption of primary produce, tourist development and accommodation…

SCH strongly believes that the existing Primary Production Zone in the Clare and Gilbert Valleys Council Development Plan fails to have proper planning regard to the range of reasonably expected land uses in such a Zone, most particularly including depots such as that operated by my client.

The new Rural Zone appropriately contemplates diversification of existing businesses including for storage, albeit my client would like to see depot uses more explicitly addressed and envisaged in the Zone policy.

Private works depot uses generally

It is obvious that depot uses such as that operated by my client (as opposed to public service depots, which are broadly a similar use) have not generally been dealt with in South Australian Development Plans historically.

The lack of planning policy direction and guidance for privately-operated “depot” uses has caused a range of planning and legal problems for those who operate those uses, even if they are done so in otherwise appropriate localities, where their amenity impacts can be managed and set well back from nearby residential uses.

In my submission, a "depot" use is not particularly suited to any single kind of zone. However, typically such depot uses will be appropriately located in open, rural-type areas such as that operated by SCH in the proposed new Rural Zone due to these opportunities for large sites and increased setbacks from other development.

SCH strongly submits that appropriate depot-type uses should be expressly defined in the draft Code (see below).

Furthermore, appropriate planning policies should be included in the Code, to ensure that where a depot use is located in a Rural Zone, its amenity and environmental impacts are appropriately managed and controlled.

There is simply no reason in principle why a depot use cannot be appropriately located in a Rural Zone, subject to those appropriate controls on amenity and environment and provided that valuable primary production land is not unreasonably prevented from productive use.

SCH therefore submits that the Desired Outcomes and other planning policies that apply for Performance Assessed Development in the Rural Zone should be appropriately amended so that depot uses are envisaged, subject to controls on amenity and environmental issues as is contemplated in the more general provisions of the Code.
"Depot" land use definition

SCH appreciates that "public service depot" is defined in the Draft Code. However, it submits that a further, additional definition of "private works depot" should be inserted into the Code.

Such a definition could be worded as follows:-

**private works depot** means land used for storage and operations connected with the provision of services including roadworks or earthmoving services or similar services by a body who carries out those services in trade or commerce.

SCH submits that it is appropriate to include such a definition into the Code in addition to the definitions of "public works depot" that already exist, to recognise that some similar depots are carried out in trade or commerce by private entities, such as SCH.

The kinds of private works depots operated by SCH are not uncommon. However, despite this, those uses are largely forgotten in planning policies and have been in current Development Plans across the State.

This has caused SCH serious problems by affording its neighbours rights of appeal and the ability to seriously delay or prevent reasonable expansions of its depot use, despite it being critical for my client's ability to provide important infrastructure services to its community.

We urge the Department to incorporate such a definition in the Code when finalised, and to make appropriate provision for depot uses in Rural Zones in the Code more broadly, consistent with the submissions above.

**Restricted Developments in Rural Zone - do not alter**

SCH supports the extent of Restricted Developments in the draft Rural Zone and says that list must remain unchanged.

In particular, a "depot" and the various elements comprising a depot use (which have been asserted by others as including "fuel depot", "road transport terminal", "store" and "motor repair station") must not be included in the Restricted Development list.

SCH's difficulties and experiences with the planning system and third-party appeals exemplify why such depot uses (and its component activities) must not be included on the Restricted Development list.

**Summary**

SCH thanks the Department for the opportunity to make submissions about the Draft Code.

SCH desires to be heard in respect of its submissions at any public meeting that may be held in respect of the Draft Code. Please advise us of the time and date of any relevant meeting in due course.
SCH awaits the implementation of the Code on 1 April 2020, consistent with its submissions.

Yours faithfully

[Signature]

Tom Crompton  
Senior Associate  
BOTTEN LEVINSON  
Email: [Redacted]

Dear Sir/Madam,

Clare Township DPA – written submissions – SC Heinrich & Co Pty Ltd

We act for SC Heinrich and Co Pty Ltd (SCH) and the Heinrich family in the above matter.

I refer to the Council’s invitation for submissions about the draft “Clare Township Development Plan Amendment” (DPA). This letter comprises my client’s submissions.

1. My client’s land holdings

SCH and the Heinrich family own or control the following land relevant to these submissions and the DPA:

   (i) Stanley Flat land - as shown in yellow in Annexure A and including two allotments used by SCH (shown in orange) as a depot\(^1\) (see attached), all presently in the Primary Production Zone and Horticulture Policy Area 2.

   (ii) Farrell Flat Road Land - as shown in Annexure B (see attached) and presently in the Residential Zone and the Industry Zone.

   (iii) Beare Street Land - 16 Beare Street, Clare\(^2\) and presently in the Residential Zone (no Policy Area).

These submissions relate to the Stanley Flat land, the Farrell Flat Road land and the Beare Street land and are summarised immediately below.

2. Executive summary - my client’s position

My client makes three principal requests for amendments and further investigations for the DPA relating to the three areas identified above. That is, my client respectfully seek:

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\(^1\) Allotment 5 and 530, Horrocks Highway, Stanley Flat comprised in CT 5262/640 and CT 6117/604.

\(^2\) Comprised in Certificate of Title 5262/638.
(i) **Stanley Flat Land**

That at least the Depot Land but if feasible, the Stanley Flat Land be re-zoned
to (in order of preference), an appropriate mixed use, commercial, or light
industrial-type zone that is sympathetic to the establishment and continuation of
depot uses carried on by my clients and others.

(ii) **Beare Street Land**

That the Beare Street Land and its locality be incorporated into the proposed
new Medium Density Policy Area, to permit the development of dwellings at
higher densities than presently contemplated by the more general Residential
Zone provisions.

(iii) **Farrell Flat Road Land**

That certain anomalies in the location of the Zone boundary between the
existing Industry Zone and Residential Zone at Farrell Flat Road be corrected
as shown in Annexure B.

I will detail the background to SCH the Depot Land, which is the principal focus of
these submissions. I will then elaborate on my client's other requests for the DPA.

3. **Background to SCH and the Heinrich family**

SCH is a family-owned and operated earthmoving, quarrying and materials transport
company that was founded by my client’s father, Stanley Heinrich in 1954.

SCH commenced as primarily an earthmoving contractor, but has grown over time and
now provides earthmoving, quarrying/landscape supply and haulage services mainly
across the mid-north of South Australia.

SCH has been a longstanding source of employment for Clare and the mid-north. It
has now been an important supplier of quarrying, earthmoving and haulage services to
local and State government and the private sector for many decades.

SCH presently employs 22 staff, who work at various work sites across the mid-north of
South Australia and the Depot Land itself. Its business relies heavily on the use and
parking of light and heavy vehicles and equipment. Its fleet includes light utes, small
medium and large trucks and a range of earthmoving quarrying equipment including,
for example, excavators, dozers, scrapers and mobile crushing plant.

SCH has always required a secure and appropriately located depot facility for its
business equipment. Accordingly, the Heinrich family purchased allotment 5 at the
Depot Land in 1981 because they considered it suitable for their depot needs. SCH
has continuously used allotment 5 as a business depot for some 37 years since then
but more recently, it expanded to allotment 530.

In 2014, SCH lodged a development application to reconfigure and expand its depot
and provide a covered vehicle parking building and associated works3 (2014 DA). The
Council processed the 2014 DA as a Category 3 form of development and granted
development plan consent to the 2014 DA on 7 April 2017 (2017 Consent).
However, as a result of the Category 3 categorisation due to the Primary Production Zoning (PPZ) of the land, my client was forced to defend proceedings by representors in the Environment, Resources and Development Court (ERD Court) challenging the 2017 Consent. The ERD Court appeal caused significant delay and cost to my client and culminated in consent orders quashing the 2017 Consent for procedural reasons.

Earlier in 2018, SCH lodged a fresh development application for its depot to regularise the use of the land and provide its desired covered vehicle parking building (2018 DA). However, again due to the current zoning, this application was also processed as a Category 3 form of development. It will soon be notified accordingly, with representors again being given appeal rights.

4. **Background to the Stanley Flat Land generally**

As shown in Annexure A, the Stanley Flat Land contains a range of allotment sizes ranging from less than 1 ha to approximately 30 ha of irregular shape and configuration. The Stanley Flat Land is bisected by the Hutt River and various unmade public road reserves. It contains various scattered native vegetation.

Despite the present zoning, many parts of the Stanley Flat Land are not used for productive primary production purposes. Rather, much of that land is presently owned or controlled by the Heinrich family and is used either as a depot (see above), residential purposes, vehicle parking (on Section 3029 at Lookout Road) or is vacant and unused.

Aside from my client’s land, Mr David Willson owns land where shown in Annexure A (Willson Land)⁴. The Willson Land is used as a residence and for commercial activities associated with Clare Valley Tours, including the parking of tour bus(es).

I now turn to my client’s specific submissions in relation to the Depot Land and more broadly, the Stanley Flat Land.

5.1 **Re-zoning critical to SCH’s ongoing commercial viability**

It is beyond argument that SCH’s depot and “home base” at the Depot Land in Annexure A is critical to the viability of SCH’s business. As mentioned, the Depot Land is the family’s central “home base” for all of the administration and parking/depot-type activities associated with its business.

It is equally critical to the ongoing viability of SCH’s business that it operate an appropriate depot to park, clean and service its vehicles and equipment and to conduct its other business activities.

To function efficiently, SCH will continue to have a need to upgrade or reconfigure its depot to meet its dynamic and evolving business needs. SCH requires flexibility to efficiently make sensible upgrades of its depot as needs arise.

However, it is evident above that my client has already experienced serious problems with developing its depot. These have largely been caused by the terms of the current PPZ.

My client believes it is critical that the Council’s Development Plan recognise its long-standing depot use and be more sympathetic to it, to ensure the continued viability of SCH’s business at the Depot Land.

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⁴ Sections 5 and 9 and allotment 4 in DP49598.
My client therefore submits that the DPA should be expanded to include the Stanley Flat Land but at least (and most importantly), the Depot Land and that this land be re-zoned to, in order of preference, a mixed-use type zone, a commercial zone or light industry zone.

5.2 Land already incompatible with productive primary production

In our submission, given the physical state of development on the Depot Land over many decades, the current PPZ policies are now of very limited relevance to much of the Depot Land.

For the same reasons, substantial portions of the Stanley Flat Land, but certainly the Depot Land is unlikely to be conducive to primary production or to ever be converted back to primary production. We make the following further submissions:

(I) Allotment 5 has been approved for and been developed with office and administration areas, storage buildings and staff amenities associated with SCH’s depot there.

(II) Underground fuel tanks, a re-fuelling pump and associated pumping infrastructure already exist and have been actively used for decades on allotment 5 in association with my client’s depot and previous agricultural land uses.

(III) Significant areas on the Depot Land and other land and public roads have historically been used for the manoeuvring of heavy vehicles associated with the depot.

(IV) The irregular shape, configuration and pattern of allotments is not conducive to wide-scale “viticulture and other agricultural production” or economically productive “cropping and grazing” activities contemplated by the current PPZ and Horticulture Policy Area 2.

(V) The sporadically-configured allotments are interrupted by the Hutt River and tracts of native vegetation, which make the efficient use for primary production limited.

(VI) Much of the Stanley Flat Land is already owned by either my clients or Mr Willson, neither of whom are farmers or wish to use the land for farming.

In our submission, the historical development of the Stanley Flat Land is now not conducive to productive primary production use and in the main, is unlikely to be converted back to primary production. This renders much of the PPZ policy irrelevant to this portion of the PPZ.

It follows that a more suitable and relevant suite of policies akin to a rural-type, sensitive mixed-use, commercial or light industrial zone should be seriously considered and investigated at least for the Depot Land (but also for the Stanley Flat Land).

5.3 Proposed re-zoning a good economic outcome for Clare

The Council engaged Property & Advisory to conduct a study entitled “Clare Industrial

6 See PPZ, Objective 1.
Land Study"*(P&A Study)* as part of its DPA investigations, given the lack of appropriately located industry zoned land in Clare.

The P&A Study recognised that there are economic benefits to Clare of securing future industrial type land supply:

*The clear benefit of securing a future industrial land supply is that it provides scope for Council to market to town new industries and investors, with flow-on effects such as increased local employment, improved rate revenue and improved expenditure on local construction and suppliers. Council cannot, of itself, furnish new industrial investment, but it can provide the conditions that make the town attractive to investors, and ensure that the town is at least on those investors "radar".*

As mentioned, SCH is already an employer of some 22 persons in the Clare region. It indirectly employs many others. With further investigations and appropriate policy change, the Stanley Flat Land could become a meaningful contributor of employment-generating uses that would provide economic benefits for the Clare Township and the Council area generally.

In our submission, it makes eminent planning sense, for the Depot Land and its locality to be permissive of uses that contribute to the economic future of Clare and its surrounds, subject of course to the outcomes of further detailed investigations.

### 5.4 Re-zoning can address shortage of commercial/industrial land

The P&A Study also recognises that there are locational and other difficulties with the existing commercial and industrial land supply in Clare. The P&A Study notes as follows about the commercial and industrial land supply problem:

*Arising from the ongoing investigations and engagement has been a continuing theme regarding the lack of suitable industrial land within Clare for industrial and commercial businesses to locate and grow. This lack of both diversity and growth has, anecdotally, led to out-of-zone developments occurring and a range of interface problems with residential land uses.*

My client agrees with the sentiments of others about the historical lack of suitably-zoned land at Clare for commercial business such as it to locate and grow.

Indeed, SCH’s Stanley Flat depot is one excellent example of “out-of-zone” developments occurring (with all of the resultant procedural and planning problems), due to a historical lack or inappropriateness of appropriate commercial and industrial-type zones in and near Clare.

To address the problem, the P&A Study identifies the Stanley Flat Land as being one potentially suitable option for alternative commercial or industry-type zones and was nominated as Option 6.

My client respectfully does not agree that the Stanley Flat Land would have no economic advantages over other townships such as Saddleworth or Balaklava. Indeed, that land remains an excellent and economic location for my client’s depot and administrative premises.

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7 PA 1829, R0194 dated June 2018
8 See Property and Advisory report, page 22
9 See page 2.
10 See Table 5 and Figure 11, pp 25-26.
In my submission the natural planning advantages of its distance a short distance away from suburban Clare far outweighs the location of commercial and industry zones near to the township. The land use interface problems with the existing industry and commercial zone locations are well documented by P&A. Any economic disadvantages by infrastructure deficiency at Stanley Flat can be solved including by contributions from my client and others. I will address the specific planning advantages of Stanley Flat in further detail below.

However, my client strongly maintains that the Stanley Flat Land and at least the Depot Land therein, is an excellent potential location for a carefully-considered, environmentally sensitive mixed-use, commercial or light industrial-type zone that can address the current lack of such appropriately located land in Clare itself.

**Stanley Flat Land a good planning outcome for re-zoning as proposed**

Of course, detailed investigations would be required to ensure that the Stanley Flat Land is suitable for the kinds of uses envisaged in a mixed-use, commercial or industrial-type zone. Those considerations are identified in the P&A Study\(^{11}\). Applying P&A’s considerations, in my submission the Stanley Flat land:

(i) **Traffic** - is accessible to heavy vehicles without causing undue problems for other traffic and has access to an (albeit partly unmade) local road to the north if required;

(ii) **Amenity, impacts and character** - is sufficiently separated from the township and residences in the PPZ so as not to cause significant diminution of the amenity of any sensitive use;

(iii) **Topography** - is generally flat and would require minimal earthworks for future development;

(iv) **Flood hazard risk** - has not in my client’s experience been significantly affected by flooding, nor was the site identified as a flood hazard risk during assessment by my client’s stormwater engineers, Mace Engineering, or by the Council or the NRM Board during the assessment of the 2014 DA; and

(v) **Infrastructure** - is capable of connecting to infrastructure and of being "self-sufficient" in terms of water and electricity. Infrastructure improvements could be made in the future including by co-operation with my clients, to service this land.

(vi) **Southern gateway** - is not on the southern approach to Clare, which Property and Advisory advise is a gateway location and should not be developed for industrial-type uses.

With these factors in mind, my client strongly considers that the Depot Land (and the broader Stanley Flat land) sufficiently satisfies the criteria identified by P&A (and Jensen +) and merits re-zoning in accordance with policies that are sympathetic to the continuation of SCH’s depot on the Depot Land, being the most critical factor for my client.

We acknowledge that the considerations identified in the P&A Study\(^{12}\) are referenced only to industrial land. However, the same planning considerations arise in relation to

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\(^{11}\) See page 24.
\(^{12}\) See page 24
commercial and mixed-use type uses that my client seeks for the Depot Land.

Whilst further investigations would clearly be required, in principle a re-zoning of the type proposed, if properly investigated and prepared, would be a sensible planning outcome for both the Clare Township and Stanley Flat and would have economic benefits to the Clare community generally. New zone provisions could be developed to ensure that the amenity of surrounding residences is maintained and that environmental considerations including watercourses such as the Hutt River are maintained.

The re-zoning would have the additional significant planning and economic benefits of allowing my client to continue its business operations efficiently, to ensure that SCH grows as a source of employment and as a vital service to the Clare township.

Specific amendments to current zoning

My client makes the following specific submissions concerning the possible future planning policies that could conceivably apply as part of a mixed use, commercial or light industrial zone at the Stanley Flat Land.

We submit that any new zoning for the Depot Land and the Stanley Flat land should take the following into account:

1. make activities associated with my client’s business depot a merit, Category 2 form of development at worst;

2. contain a provision listing envisaged forms of development in the Zone to include a "depot", "vehicle parking", "re-fuelling facilities", "office", "warehouse", "store", "workshop", "road transport terminal".

3. incorporate appropriate Objectives and Principles of Development Control controlling the emission of noise and odour, to preserve the interface with the Primary Production Zone and to protect the amenity of residences in the locality;

4. incorporate appropriate policies concerning the generation of traffic, car parking and vehicle movement, particularly on to the Horrocks Highway

5. incorporate policies to ensure the preservation and enhancement of natural resources and the natural environment, particular the Hutt River and its catchment;

6. incorporate appropriate water sensitive design and stormwater management policies to regulate operations in conjunction with existing Council Wide policies;

7. provide for landscaping buffers and visual screening the proposed range of uses from public roads and surrounding sensitive uses.

Procedural amendments

I have already outlined the cumbersome and difficult non-complying and Category 3 processes that now apply in the PPZ. My clients emphasise the need for change to

13 Noting that the Horrocks Highway is a primary arterial road identified in the Council’s Development Plan.
the policies applying to the Depot Land and make the following further submissions.

The non-complying list in the PPZ picks up many activities including, for example, a store, road transport terminal and a motor repair station that are broadly similar to those associated with a typical depot use. Whilst my client does not accept that a depot use fairly answers those forms of development (and is a separate and distinct form of development in its own right), to avoid doubt my client suggests that they be removed from the non-complying list.

We emphasise the importance that the Procedural Matters provisions applying to the Depot Land be altered to make a “depot” at worst a merit, Category 2 development.

**Farrell Flat Road Land**

As shown in Annexure B, my clients own or control substantial land located in the Industry Zone and Residential Zone at Farrell Flat Road, Clare.

However, there are anomalies and inconsistencies between existing, approved land uses and the zone boundary in this location. My clients therefore respectfully submit that the Zone boundary should be corrected and relocated to ensure that their existing lawful residential uses are removed from the Industry Zone and relocated into the Residential Zone.

In particular, my client Malcolm Heinrich resides at allotment 50 in DP 85125 and owns the adjacent residential land at allotments 5 and 6 in DP2300, where shown in Annexure B. However, at present these residential allotments are either wholly or partly located in the Industry Zone. The zone boundary ought to be moved northward so that these three allotments are located wholly in the Residential Zone.

**Beare Street Land**

Finally, as noted above my client SCH operates an un-manned service trade premises involving the display and sale of various landscaping supplies from its Beare Street Land.

The Beare Street land was formerly used by SCH as its business depot prior to relocating that depot to allotment 5 on the depot land in approximately 1981.

Should approval be forthcoming to SCH’s development application to regularise the depot use at allotment 530, my client intends to cease its service trade premises operation at the Beare Street Land and instead wishes to develop the Beare Street Land with dwellings.

Given the opportunity afforded by the DPA, my client respectfully seeks that the DPA locate the Beare Street Land and its locality in the proposed Medium Density Policy Area. This would allow the Beare Street Land to be developed at slightly higher densities than is facilitated by the remainder of the Residential Zone. 14

My client sees no particular planning or other reason why the Medium Density Policy Area cannot apply to an extended area that includes the Beare Street land.

My client respectfully submits that expanding the Medium Density Policy Area in this way will encourage further residential development in Clare, which will have resultant

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14 For example, detached dwellings with sites down to 350 m² and row dwellings with site areas in the order of 250 m².
economic benefits for the township.

Summary

My client wishes to be heard in respect of these submissions at the public meeting on 25 September 2018.

Please confirm that my client will be given the opportunity to appear personally or by representative to make submissions at that public meeting.

Yours faithfully

Tom Crompton
Senior Associate
BOTTEN LEVINSON
Email: tlc@bllawyers.com.au
ANNEXURE A

MAP OF STANLEY FLAT LAND AND DEPOT LAND
ANNEXURE B

PROPOSED RE-LOCATION OF ZONE BOUNDARY AT FARRELL FLAT ROAD
Land Services Group

The information provided above is not represented to be accurate, current or complete at the time of printing this report. The Government of South Australia accepts no liability for the use of this data, or any reliance placed on it.

Note: Place allotments 5 and 6 in DP 2300 and allotment 50 in DP 85125 into the Residential Zone.

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