FUTURE URBAN

ENGAGEMENT SUMMARY

URBAN GROWTH MANAGEMENT STRATEGY

DRAFT UGMS FINAL ENGAGEMENT – JUNE – JULY 2025

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Document Control

Revision	Description	Author	Date
V1	Draft Summary	KGH	05.08.2025
V2	Updated Summary to include response	KGH	26.09.2025

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HOW WE ENGAGED

Engagement on the improved draft of the Urban Growth Management Strategy (UGMS) was undertaken between 13 June 2025 and 21 July 2025.

During this period, we sought feedback from the community and key stakeholders through:

- Community Open Days held at the Civic Centre on Saturday 28 June and Tuesday 1 July; and/or,
- Completing a survey; or,
- Making a written submission.

The draft UGMS, a summary of the improvements and supporting documents were available on Council's Have Your Say page.

The engagement activities were advertised through direct letters to more than 1,200 properties, Council's social media, Council's newsletter and by direct email to key stakeholders.

WHO WE HEARD FROM

Over the engagement period, more than 150 people or organisations provided feedback on the improved UGMS, including:

- Approximately 70 people registered to attend the Community Drop In Sessions;
- 132 survey responses; and
- 27 written submissions[1].

This is in addition to the 141 people who attended the Community Drop In Sessions in November 2024 and the 92 written submissions that were received late 2024, on the previous version of the UGMS.

In relation to the survey, we heard from:

- Mostly local residents and ratepayers (>75% of survey responses);
- 17 local business owners; and
- Some 13% identified themselves as regular visitors to the area.

In relation to the submissions received:

- 15 submissions (41%) were from people directly affected by an action in the draft UGMS;
- 5 submissions were from State Agencies;
- 2 submissions were from local residents (excluding those who were directly affected)
- 1 submission was from an organisation;
- 1 submission was from a utility provider;
- 2 submissions did not disclose whether they were local or otherwise; and,
- 1 submission was from a resident of Alexandrina Council.

The community open days provided an opportunity for the community to ask questions and express feedback to Council staff and the consultant team. A team of 4 people, including 3 qualified and experienced planners, were available to answer queries and explain the draft UGMS and attendees were encouraged to capture their feedback with sticky notes and coloured dots representing support

[1] One late submission was also received on 25 August 2025, which was not included within the engagement summary.

(green) or concern (red) with aspects of the draft UGMS. Images of the boards, including the feedback captured during the open days are included in **Appendix 1**.

WHAT WE HEARD

The feedback received in relation to the UGMS is summarised for each of the principles of the draft UGMS below.

A copy of all feedback reviewed in order to prepare this engagement summary is appended to this summary, including:

- Images of the engagement boards from the Community Open Days, including the feedback captured during both open days forms **Appendix 1**;
- A summary of all submissions received forms **Appendix 2**;
- A copy of all submissions, with personal contact details redacted, forms **Appendix 3**; and,
- A report summarising the findings from the survey is provided in **Appendix 4.**

Figure 1.1 *Community Open Day in June*



Principle 1

Housing supply meets the needs of our community

Survey

80% of survey responses (106 people) supported creating opportunities for young people and families to build or buy a home in Victor Harbor.

The survey also posed the question '*do you support Council focussing on one priority growth area for housing, being along Welch/Armstong Road / the Ring Route / Waggon Road?'.* Some 50% (66 people) supported this, whilst 28% did not support this and a further 20% were 'not sure'.

In relation to the rural living areas, some 45% of responses (59 people) *do not support* the reduction in the 'rural living infill investigation areas' whilst 35% did support the reduction to these areas.

Most surveys also provided additional feedback. The most common comments in relation to housing were:

- There needs to be more land and affordable packages for families and reiterated support for initiatives that attract families (7 survey responses); and,
- Bigger allotments are needed for young families and for urban greening (5 survey responses). Some survey responses indicated a size, which was generally larger than 800m^2.

Submissions

The most common comments in relation to housing made in the submissions were:

- Would not be supportive of high-density housing (8 submissions);
- Support for the reduction in 'Rural Living Infill Investigation Areas' (8 submissions);
- Plan for the right mix of family and young person housing (7 submissions); and
- Consider low rise residential development in the main street on Victor Harbor (7 submissions).

Community Open Days

At the community open days, there was feedback received in relation to:

- Uncertainty and dissatisfaction with the Greater Adelaide Regional Plan, and in particular, the extent of land it identified for growth
- Mixed opinions in relation to the reduction of 'Low Density Infill Development Investigation Areas'. In particular, several people who reside to the west of Greenhills Road were dissatisfied that their land was no longer being investigated. Conversely, several people from Morgan Park were satisfied that their land was no longer being investigated.
- There were mixed views in relation to including some rural living areas within the Priority Growth Area.

Principle 1 Housing supply meets the needs of our community
Response to Feedback
In response to the above feedback, the following improvements were made to the UGMS: • Expanding actions which relate to housing opportunities for young people and families (actions 1.2B, 1.2C and 1.2D); and • Providing additional commentary regarding the investigations needed to inform the Priority Growth Area including, investigations will confirm what upgrades to infrastructure are needed, confirm which roads and intersections will require upgrading and identify areas of protected and high-value vegetation and habitat. No additional changes were made in relation to the 'rural living infill investigation areas'.

Principle 2

Our economy is productive, prosperous and attracts investment

Survey

The survey posed the question '*do you support actions which seek to change the trajectory of Victor Harbor by being a more attractive, dynamic and sustainable place for young people to live, work and study?* Some 73% of survey responses (97 people) indicated that they support these actions.

In addition, some 58% (77 people) indicated that they support securing a future activity centre at Encounter Bay, whilst 23% indicated they weren't sure and 17% indicated that they did not support this.

The survey also specifically asked people if they '*support focusing the potential for new activity centre within the 'priority growth area' and removing any actions relating to rezoning commercial land on Adelaide Road / Waterport Road*?' Some 38% (50 people) indicated that that they 'weren't sure' whilst 36% indicated that they support this. Some 24% did not support this change to the UGMS.

In relation to employment land, some 54% (71 people) supported increasing the area for employment land to the north of Waterport Road and prioritising the rezoning of this land whilst 27% people did not support this.

The majority of survey responses (93%) supported ensuring that farming activities are identified and protected from incompatible land uses.

Most surveys also provided additional feedback. The most common comments in relation to the economy were:

- Its important to protect the right to farm (4 survey responses);
- Council should focus on professional services and tourism (2 survey responses); and
- Encounter Bay needs a retail centre (2 survey responses).

Submissions

In relation to the economy, there were no emerging themes or recurring comments that were consistent across multiple submissions. The majority of feedback relating to the economy was received from Business Victor Harbor, which included the following suggestions:

- Consider imposing a vacant land differential rate on vacant industrial or commercial sites - through a targeted approach;
- Encourage the implementation of an 'out of centres' policy focusing growth within and around the CBD to avoid splitting the towns commercial base; and
- Support the creation of smaller neighbourhood shopping precincts with small-format supermarkets and daily essential services, while keeping major hospitality and large retail facilities concentrated in the CBD.

Community Open Days

One community member gave clear feedback in relation to rezoning along Waterport Road and raised several concerns, including biodiversity, traffic, flooding and suggested focussing only on the land immediately abutting the existing industrial estate.

Principle 2 Our economy is productive, prosperous and attracts investment
Response to Feedback
In response to the above feedback, the following improvements were made to the UGMS: • Providing further details on the investigations that will be needed to inform the rezoning of land for employment purposes to the north of Waterport Road; • Expanding the proposed rezoning for employment purposes, to include the 'Future Employment Area' that is in the Environment and Food Production Area (i.e., amalgamating these two separate actions areas, into one); and • Add an action to engage with Alexandrina Council regarding the potential expansion of the employment area to the east.

Principle 3

Services and infrastructure meet demand and are reliable and efficient

Survey

The majority of survey responses (76% or 101 people) support the preparation of a business case for Council to provide childcare, particularly for children under the age of 3.

Most survey responses also made comment on infrastructure matters in response to the question seeking any additional feedback. The most common comments in relation to infrastructure were:

- Local services are at capacity and services need to be increased to accommodate growth (22 survey responses). This comment was usually in reference to access to medical services, including GPs, specialists and increasing the capacity of the hospital.
- Traffic on both local and State roads was raised as a concern (14 survey responses).
- Speed limits and/or intersection treatments, particularly on along the ring route was also raised as a matter that needed attention (9 survey responses).

Submissions

There was one submission which was referred to multiple properties owned by multiple land owners. Each of these submissions were counted as individual submissions, however, raised the same infrastructure matters, including:

- Traffic needs to be considered in relation to the Priority Growth Area;
- A new intersection on Armstong Road could impede quality of life and threaten native vegetation; and
- Rezoning for employment near Waterport Road needs to consider flooding, stormwater and inadequate road conditions.

Other comments raised in relation to infrastructure were only raised once. Some of the key suggestions included:

- Environment Protection Authority encourages use of the Stormwater Management Overlay, particularly for any areas flagged for the intensification of urban development and especially in the vicinity of environments that are sensitive to pollutant typically found in urban run off.
- Department of Environment and Water recommends that stormwater discharge to the coast is minimised via Water Sensitive Urban Design so that sensitive benthic habitats within the Encounter Marine Park Habitat Protection Zone are protected.
- SAPNs substation (4 Day Road) is situated within the Priority Growth Area and future investigations should consider the interface with this station. Land may be required for a new substation to meet increasing demand for electricity.
- Business Victor Harbor made several suggestions including that Council should:
    - » Develop a detailed Infrastructure Staging and Funding Plan within 12 months, including cost breakdowns, timelines and developer contributions (including digital infrastructure)
    - » Explore bold, long-term solutions to overcome Victor Harbor's fundamental connectivity challenges to provide the region with the same type of major highway connections that underpin growth in other major regional towns such as Mount Barker and Murray Bridge

Principle 3 Services and infrastructure meet demand and are reliable and efficient
Community Open Days
Several land owners suggested greater setbacks or buffers were needed along main roads, such as the ring route. In relation to infrastructure, some community members expressed concern over a potential new intersection on Armstrong Road (as shown on Map 4 of the Strategy). There was also detailed feedback given by several members of the public about speed limits and intersection safety, particularly along the ring route.
Response to Feedback
In response to the above feedback, the following improvements were made to the UGMS: • Updating the actions relating to infrastructure investigations to make it clear which infrastructure needs to be considered and planned for, to inform the prioritisation of future growth areas. This includes confirming that detailed traffic investigations will be needed to inform the Structure Plan for the Priority Growth Area and to rezone land for employment purposes to the north of Waterport Road. Such investigations can consider potential road widening, if needed; • Removing reference to new intersections on Armstrong Road, with such to be determined by future traffic investigations; • Updating action 3.4C to confirm that a Code Amendment to apply the Stormwater Management Overlay will be undertaken; • Expanding the area where a new river crossing may be considered for the Hindmarsh River; and • Adding a new objective, target and actions relating to public transport.

Principle 4

Our environment is protected and enhanced

Survey

The majority of survey responses (90% or 119 people) supported Council committing to establish key wildlife corridors, particularly linking the Hindmarsh and Inman Rivers.

Most survey responses included additional feedback. In relation to the environment, the most common comments were:

- Protection, and enhancement of, green space/corridors and biodiversity is important (12 survey responses).
- Preservation of the coast and coastal character is a priority (6 survey responses).
- Watercourses should have a large buffer (for flooding and biodiversity) (5 survey responses). Responses included varying buffer widths ranging from 100 metres to 300 metres.

Submissions

Many submissions provided feedback in relation to the environment. One submission was provided on behalf of seven different properties within the Priority Growth Area and was counted as seven individual submissions. The most common comments made in relation to the environment were the comments raised in these seven submissions and included:

- Improve the mapping relating to vegetation to better represent high value environmental assets and protect vulnerable and listed species in the area.
- Development is having a negative impact on Hindmarsh River. Climate change adaption plans and inundation zones should be considered when investigating overall watershed and stormwater impacts.
- Environmental assessments should precede infrastructure investigations.
- Focus on the protection of existing wildlife corridors, heritage bush and remnant paddock trees – and then create new corridors.

Other comments raised in relation to infrastructure were only raised once. Some of the key feedback received includes:

- Develop a collaborative Fleurieu regional approach to establish South Australia's first Regional Circular Economy Hub.
- The Environment Protection Authority encourages Council to review the Environment Protection (Waste to Resources) Policy 2010 and consider including initiatives to support the circular economy in its urban growth strategy.
- The Department of Environment and Water is in the early stages of planning for a Code Amendment that will support action 4.6A in the UGMS.
- Council should apply the mitigation hierarchy within the UGMS (avoid, minimise, rehabilitate/restore, offset).
- Council should consider a nature positive target to ensure that the City of Victor Harbor should be back to 2020 levels by 2030, and 'fully recovered' by 2050.

Principle 4 Our environment is protected and enhanced
Community Open Days
Most of the actions and changes in relation to the environment were positively received. Several discussions were had with community members about the new *Biodiversity Act* and its importance to Victor Harbor specifically. Multiple community members raised concerns with recent developments where tree removal appeared excessive, and a better outcome could have been achieved if greater protections existed for vegetation and biodiversity.
Response to Feedback
In response to the above feedback, the following improvements were made to the UGMS: • Include reference to the *Biodiversity Bill 2025* and add a new appendix to include mapping of areas with known biodiversity values; • Add specific actions relating to the environmental investigations needed to inform the future Structure Plan for the Priority Growth Area and for the rezoning of land for employment purposes to the north of Waterport Road; • Add Key Wildlife Corridor Options for investigation to Map 7; and • Add a target to confirm that Council will work towards achieving net zero emissions by 2050.

Principle 5

Our landscape, character and heritage is celebrated and retained

Survey

There were no notable changes to the actions relating to character and heritage between the 2024 version of the Strategy and the 2025 Strategy[2]. As a result, there were no specific questions within the survey relating to character and heritage. Notwithstanding this, some survey responses included feedback in relation to these matters. These comments included:

- Preservation of the coast and coastal character is a priority (6 survey responses).
- Its important to protect heritage and character areas (6 survey responses).
- Growth should be avoided near the hills face areas and hills face protections should be increased near Waterport Road (1 survey response).

Submissions

Several submissions provided feedback in relation to celebrating and retaining character and heritage. This feedback includes:

- The *'State is failing to protect the uniqueness, character and charm of Victor Harbor by enabling a mechanism for high density development without adequate protection for either environment or the lifestyles of existing residents and property owners'* (7 submissions).
- Character and heritage areas should apply to our entire Council and not just some zones (7 submissions).
- Maintain strong design standards to keep development sympathetic to local character (2 submissions).
- Provide clarity on gateway policies to preserve town identity while allowing modern branding (1 submission).

Community Open Days

As there were very few changes proposed between the 2024 version and the 2025 version, most discussions focussed on explaining what the ‘gateway’ and ‘character areas’ were and advising of indicative timing for the proposed actions.

Response to Feedback

In response to the above feedback, the UGMS has been updated to allow the expansion of hills face protection for Brown Hill (i.e., to the north of Waterport Road).

Several actions are already included in the UGMS that seek to improve character and heritage protections within Victor Harbor. In addition, actions have been added to the UGMS to establish an internal process for engaging with Ramindjeri and Ngarrindjeri organisations and individuals, in line with Council’s Reconciliation Action Plan.

[2] Except for minor changes to the Gateway Overlay to consider the new greenfield areas identified within the Greater Adelaide Regional Plan.

Principle 6

Council's long term financial sustainability is not compromised by urban growth

Survey

There were no survey questions which specifically referred to the financial sustainability of the Council. Some survey responses provided feedback in relation to financial mechanisms which included:

- Consider a levy for homeowners who only use property for 2 months/year and Airbnb's / consider initiatives to entice homeowners to live locally (3 survey responses).
- Introducing a levy on unoccupied houses puts a disproportionate cost burden on houses that require less Council services (1 survey response).

Submissions

No submissions specifically provided feedback in relation to managing the financial sustainability of the Council. One submission suggested that it is reasonable to increase rates to improve infrastructure.

Community Open Days

There was no specific feedback in relation to managing Council's long-term sustainability noted at the open days.

Response to Feedback

One new action was included in relation to Principle 6, which commits Council to publish a plain-English annual 'UGMS progress' update which summarises which actions are in progress or complete.

Other Matters

Survey

Two survey responses suggested that the maps within the Strategy could be improved or were hard to read due to the scale (i.e., individual properties are hard to identify on an A4 map that applies to the whole urban area of Victor Harbor).

Submissions

Several submissions raised comments on other matters, which do not directly relate to one of the Strategy's principles. Some of these matters include:

- Alexandrina Council would like to collaborate on coordinating land and infrastructure for economic developments and work together to provide feedback on State policy. The Alexandrina Council also noted that it is finalising the South Coast Growth Strategy and preparing a Recreation and Open Space Strategy.
- Concerns regarding the Greater Adelaide Regional Plan (GARP) (7 submissions).
- General support for the Strategy as a whole (3 submissions).
- Business Victor Harbor suggested that Council should:
    - » Commit to a formal review of growth targets every 3-5 years, adapting projections to shifting economic and demographic realities economic and demographic realities;
    - » Publish annual reports tracking: land supply, development progress and reasons for delays; and
    - » Publish plain-language quarterly updates on UGMS progress and what's changing.

Community Open Days

Several community members expressed feedback on the GARP. Some provided feedback on the areas nominated within the GARP and some were concerned that the community weren't directly consulted, in a similar manner to the Council's consultation on the UGMS.

One community member gave feedback in relation to the land directly abutting the Encounter Lutheran School. In particular, they requested that this land be rezoned to 'Suburban Neighbourhood' and querying why no land use was shown for the land between Adelaide Road and Victor Harbor Road.

Response to Feedback

Several changes to mapping were made in order to improve mapping within the Strategy made. Actions relating to collaborating with Alexandrina Council, particularly regarding a potential expansion of the future employment area into Alexandrina Council.

In response to feedback from Business Victor Harbor, Council have committed to publish a plain-English annual 'UGMS progress' update which summarises which actions are in progress or complete.

In relation to the land between Adelaide Road and Victor Harbor Road, updates were made to Map 9 to add land uses to this area, albeit Council have not proposed any actions with respect to this area.

APPENDIX 1. COMMUNITY OPEN DAY BOARDS

Key Changes made to the Strategy - Addressing the Greater Adelaide Regional Plan

The areas nominated in the Greater Adelaide Regional Plan have been adopted by the State Government.

Council would like to prioritise the release of land to ensure that the growth of Victor Harbor is managed responsibly.

For more information on the Greater Adelaide Regional Plan, have a look at the Regional Planning Portal here: https://regional.plan.sa.gov.au/regional-plans/greater-adelaide

Either side of Bacteria Lane should not be future Greenfield Growth & retained as Vegetation/A Fauna Corridor

I am in 100% DISAGREEMENT with the change to either side of Bacteria Lane being vegetation only. Ridiculous assertion

DRAFT FOR CONSULTATION
JUNE 2025

Victor Harbor Council boundary
Urban Growth Boundary
Arterial and distributor roads
Future Greenfield Growth Area
Future Greenfield Supply - In EFPA
Future Employment Land

Areas which are subject to actions within Council's Urban Growth Management Strategy:
Short term actions
Medium term actions

PAGE 82

MAP 2 - PRIORITISATION OF FUTURE AREA IN THE GREATER ADELAIDE REGIONAL PLAN

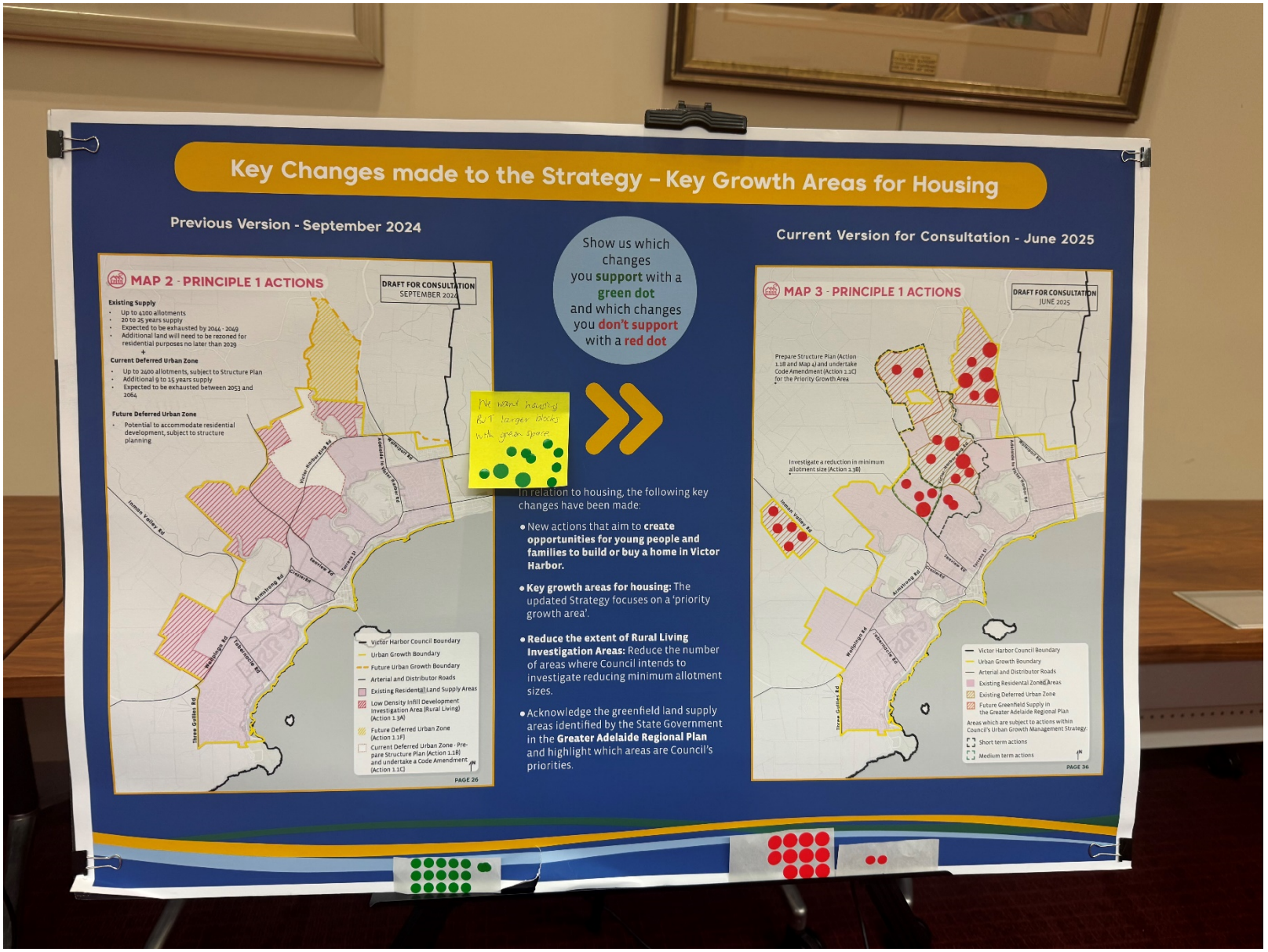
DRAFT FOR CONSULTATION
JUNE 2025

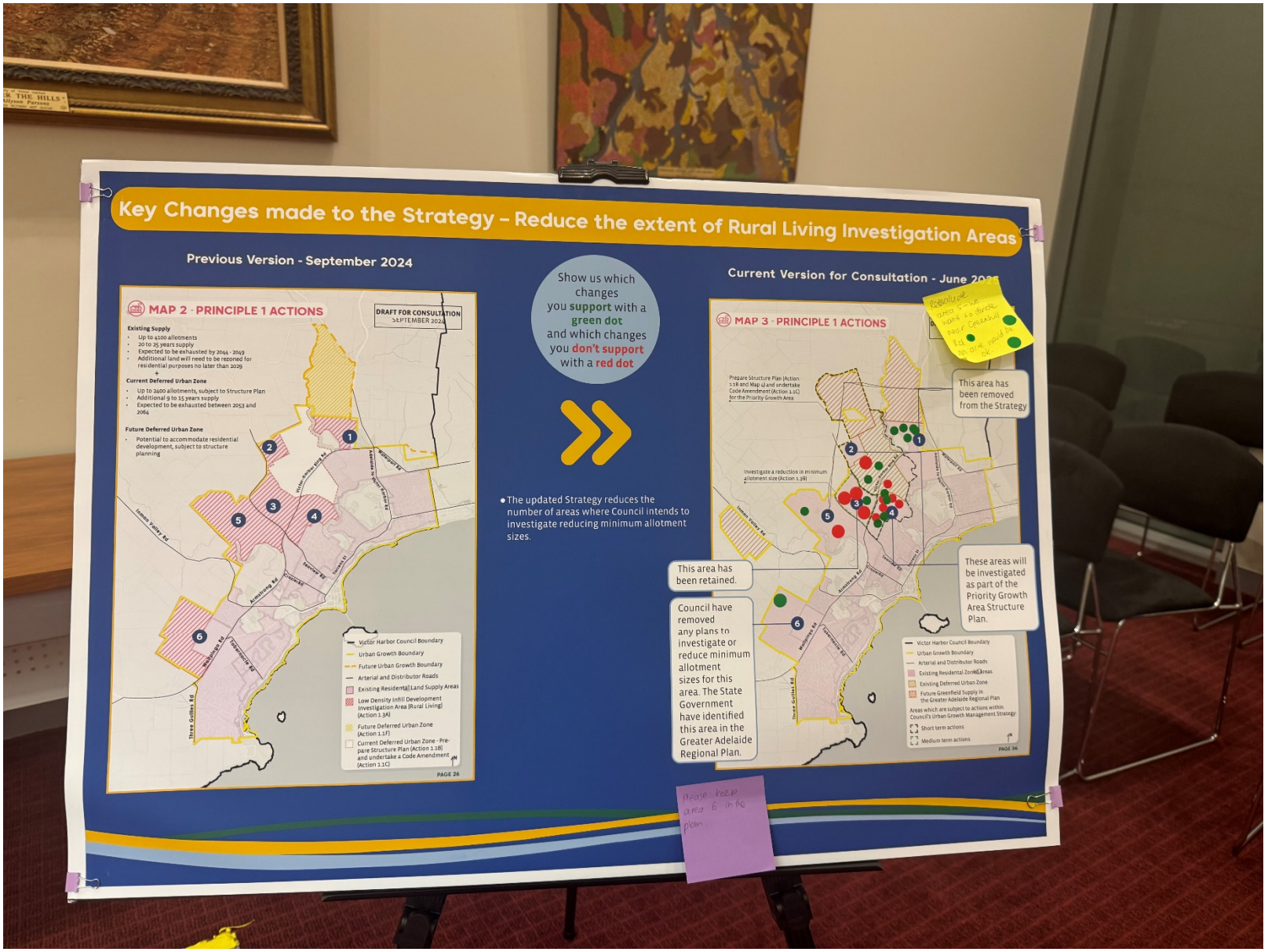
Can you merge the blue/green maps with yellow/green?

Victor Harbor Council boundary
Urban Growth Boundary
Arterial and distributor roads
Areas identified in both the GARP and UGMS
1 Order of Prioritisation

PAGE 19

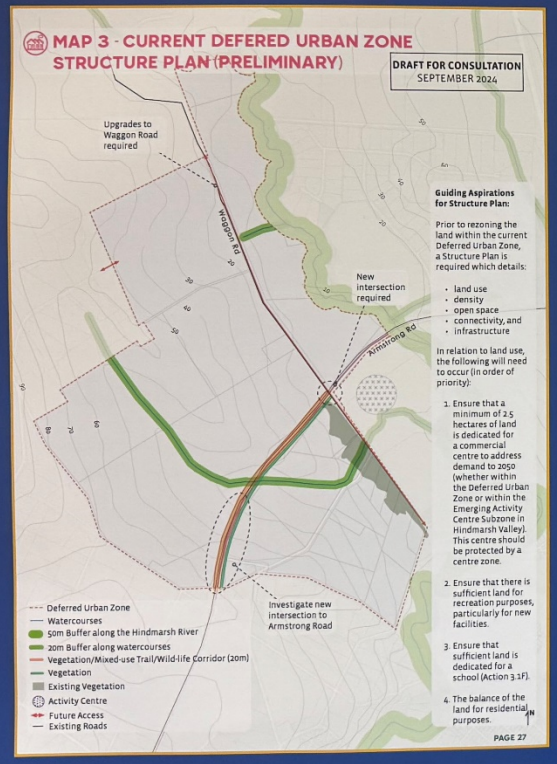
Show us if you support this prioritisation by:
- placing a **green dot** for areas you agree with
- placing a **red dot** for areas you don't agree with or do not think should be a priority before 2050


Key Changes made to the Strategy – Key Growth Areas for Housing
Previous Version - September 2024
MAP 2 - PRINCIPLE 1 ACTIONS
DRAFT FOR CONSULTATION SEPTEMBER 2024
Existing Supply
Up to 4100 allotments
20 to 25 years supply
Expected to be exhausted by 2044 - 2049
Additional land will need to be rezoned for residential purposes no later than 2029
+
Current Deferred Urban Zone
Up to 2400 allotments, subject to Structure Plan
Additional 9 to 15 years supply
Expected to be exhausted between 2053 and 2064
Future Deferred Urban Zone
Potential to accommodate residential development, subject to structure planning
Victor Harbor Council Boundary
Urban Growth Boundary
Future Urban Growth Boundary
Arterial and Distributor Roads
Existing Residential Land Supply Areas
Low Density Infill Development Investigation Area (Rural Living) (Action 1.3A)
Future Deferred Urban Zone (Action 1.1F)
Current Deferred Urban Zone - Prepare Structure Plan (Action 1.1B) and undertake a Code Amendment (Action 1.1C)
PAGE 26
We want industry BUT larger blocks with green space
Show us which changes you support with a green dot and which changes you don't support with a red dot
In relation to housing, the following key changes have been made:
New actions that aim to create opportunities for young people and families to build or buy a home in Victor Harbor.
Key growth areas for housing: The updated Strategy focuses on a 'priority growth area'.
Reduce the extent of Rural Living Investigation Areas: Reduce the number of areas where Council intends to investigate reducing minimum allotment sizes.
Acknowledge the greenfield land supply areas identified by the State Government in the Greater Adelaide Regional Plan and highlight which areas are Council's priorities.
Current Version for Consultation - June 2025
MAP 3 - PRINCIPLE 1 ACTIONS
DRAFT FOR CONSULTATION JUNE 2025
Prepare Structure Plan (Action 1.1B and Map 4) and undertake Code Amendment (Action 1.1C) for the Priority Growth Area
Investigate a reduction in minimum allotment size (Action 1.3B)
Victor Harbor Council Boundary
Urban Growth Boundary
Arterial and Distributor Roads
Existing Residential Zoned Areas
Existing Deferred Urban Zone
Future Greenfield Supply in the Greater Adelaide Regional Plan
Areas which are subject to actions within Council's Urban Growth Management Strategy:
Short term actions
Medium term actions
PAGE 36


Key Changes made to the Strategy – Reduce the extent of Rural Living Investigation Areas
Previous Version - September 2024
MAP 2 - PRINCIPLE 1 ACTIONS
DRAFT FOR CONSULTATION
SEPTEMBER 2024
Existing Supply
Up to 4100 allotments
20 to 25 years supply
Expected to be exhausted by 2044 - 2049
Additional land will need to be rezoned for residential purposes no later than 2029
+
Current Deferred Urban Zone
Up to 2400 allotments, subject to Structure Plan
Additional 9 to 15 years supply
Expected to be exhausted between 2053 and 2064
Future Deferred Urban Zone
Potential to accommodate residential development, subject to structure planning
Victor Harbor Council Boundary
Urban Growth Boundary
Future Urban Growth Boundary
Arterial and Distributor Roads
Existing Residential Land Supply Areas
Low Density Infill Development Investigation Area (Rural Living) (Action 1.3A)
Future Deferred Urban Zone (Action 1.1F)
Current Deferred Urban Zone - Prepare Structure Plan (Action 1.1B) and undertake a Code Amendment (Action 1.1C)
PAGE 26
Show us which changes you support with a green dot and which changes you don't support with a red dot
The updated Strategy reduces the number of areas where Council intends to investigate reducing minimum allotment sizes.
Current Version for Consultation - June 202
MAP 3 - PRINCIPLE 1 ACTIONS
Prepare Structure Plan (Action 1.1B and Map 4) and undertake Code Amendment (Action 1.1C) for the Priority Growth Area
Investigate a reduction in minimum allotment size (Action 1.3B)
This area has been removed from the Strategy
This area has been retained.
Council have removed any plans to investigate or reduce minimum allotment sizes for this area. The State Government have identified this area in the Greater Adelaide Regional Plan.
These areas will be investigated as part of the Priority Growth Area Structure Plan.
Victor Harbor Council Boundary
Urban Growth Boundary
Arterial and Distributor Roads
Existing Residential Zone Areas
Existing Deferred Urban Zone
Future Greenfield Supply in the Greater Adelaide Regional Plan
Areas which are subject to actions within Council's Urban Growth Management Strategy
Short term actions
Medium term actions
PAGE 36
Please keep area 6 in the plan.

Key Changes made to the Strategy – A Priority Growth Area

Previous Version - September 2024

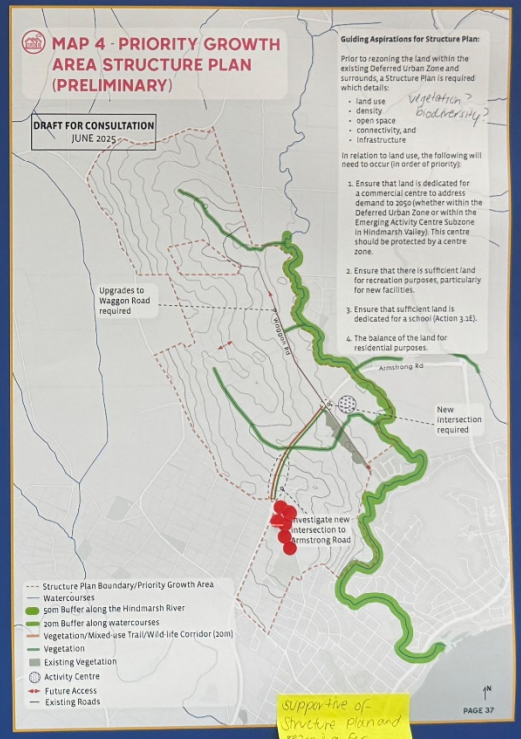


Show us which changes you **support** with a **green dot** and which changes you **don't support** with a **red dot**

The updated Strategy focuses on a 'priority growth area' which includes the:

- existing Deferred Urban Zone along Welch Road / Armstrong Road / the Ring Route / Waggon Road and
- the adjacent greenfield land supply area to the north from the Greater Adelaide Regional Plan

Current Version for Consultation - June 2025

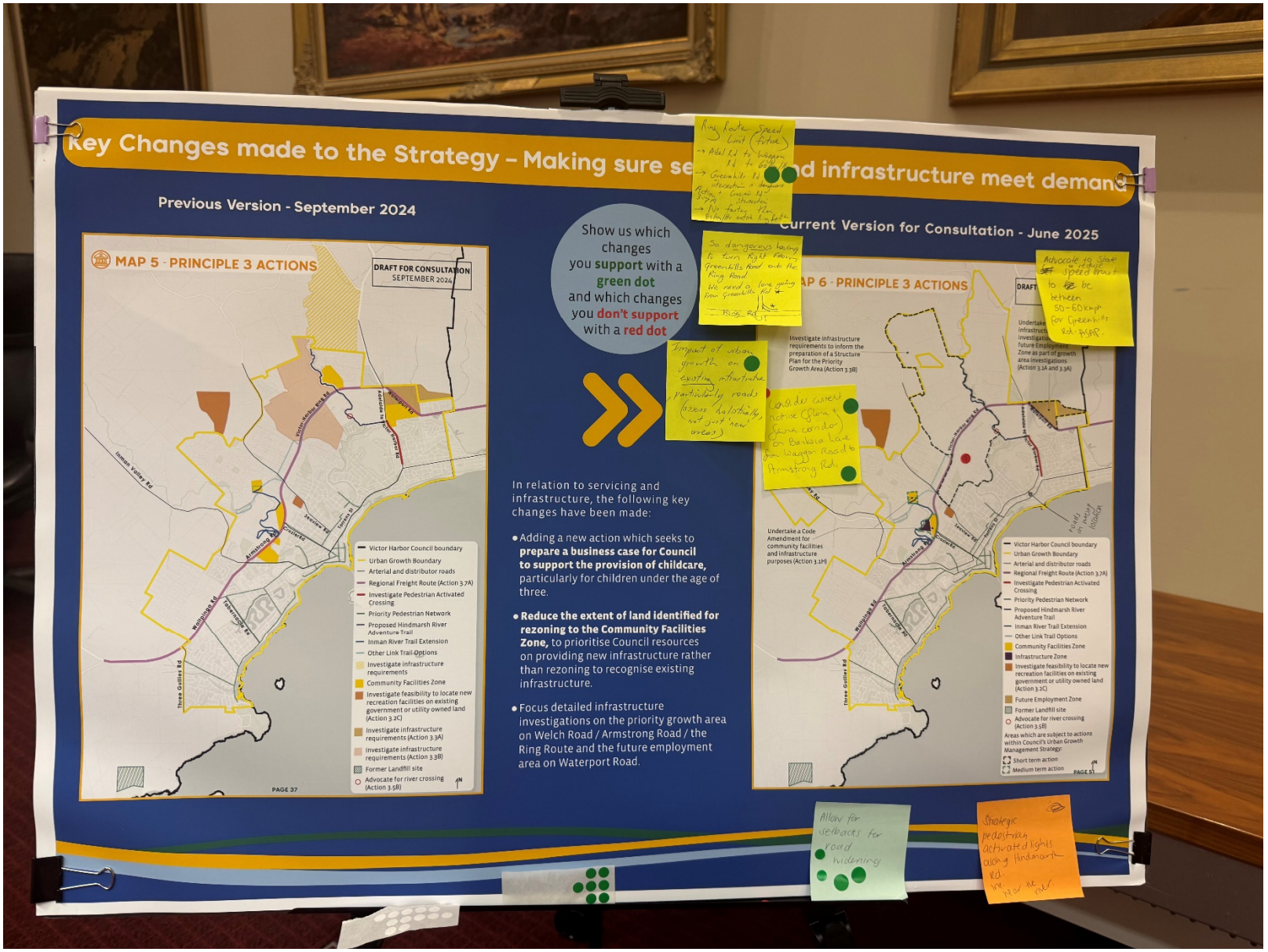


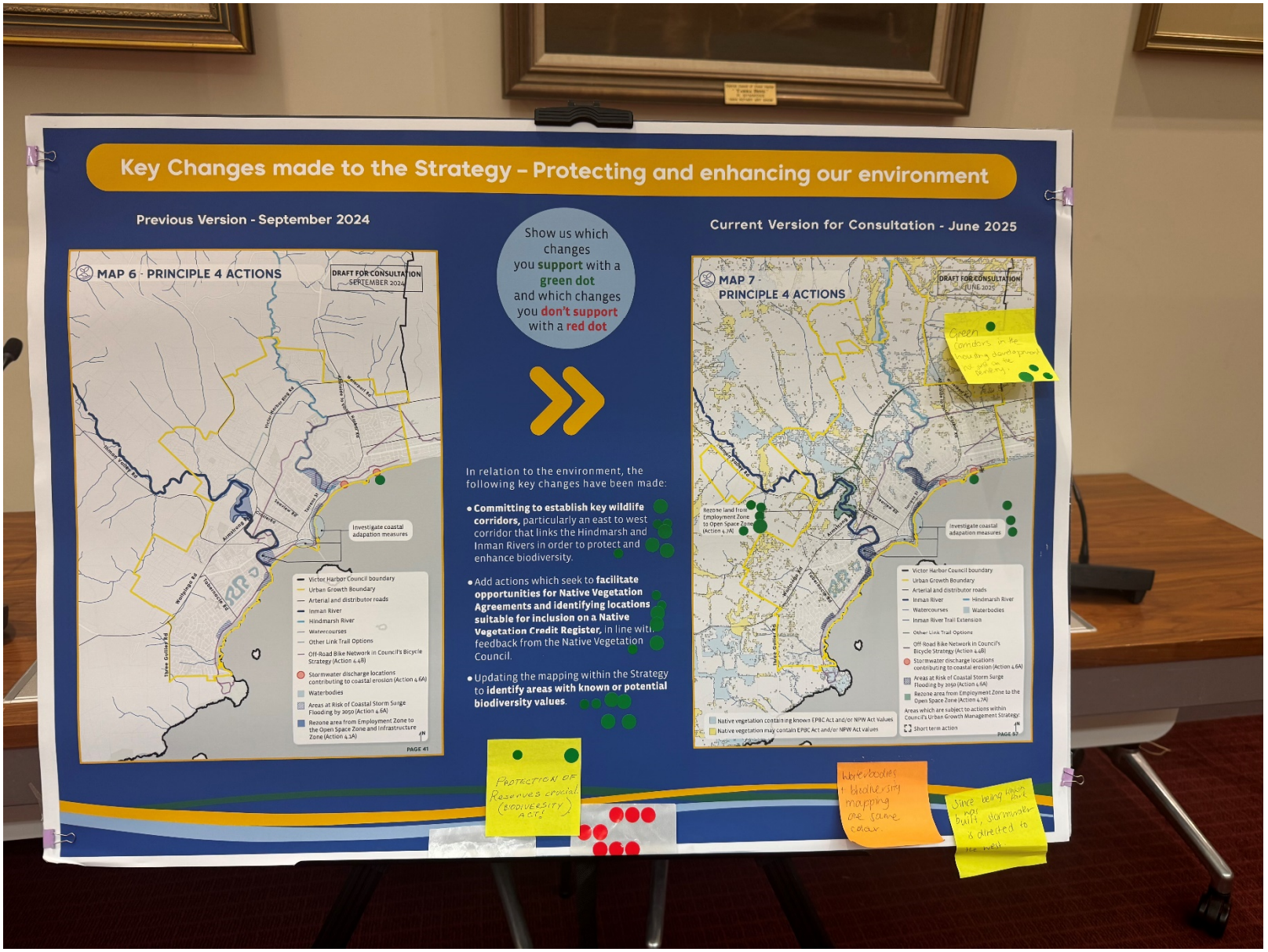
Banksia Lane should be included as wildlife corridor

supportive of structure plan and rezoning for residential purposes (of or densifying contiguous with existing residential development) to the area south of Fullers East Rd.

Do we need a greater buffer to the freight rd?

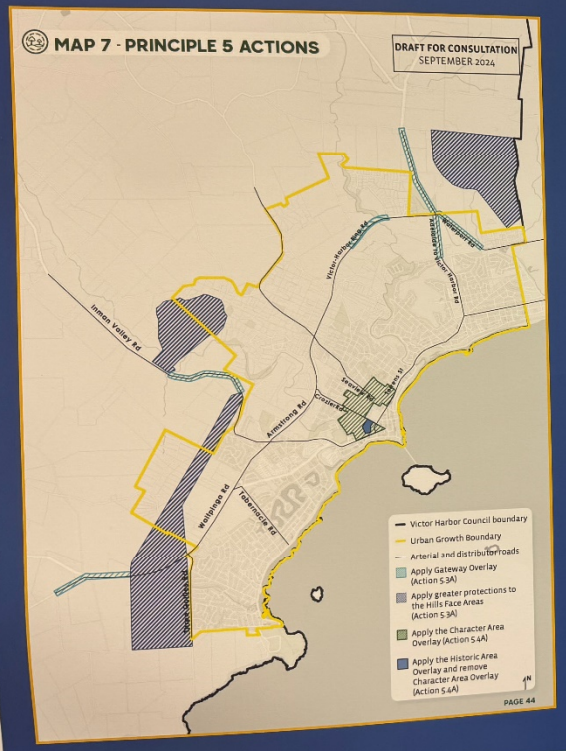

Key Changes made to the Strategy - Planning for the Economy
Previous Version - September 2024
MAP 4 - PRINCIPLE 2 ACTIONS
DRAFT FOR CONSULTATION SEPTEMBER 2024
Victor Harbor Council boundary
Urban Growth Boundary
Future Urban Growth Boundary
Arterial and distributor roads
Investigate rezoning to allow for a larger centre at Encounter Bay (Action 2.1B)
Zoned Commercial Areas
Rezone for Employment Purposes (Action 2.1D)
Rezone for Commercial Purposes (Action 2.1C)
Future Employment Zone (Action 2.1F and 2.1G)
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Current Version for Consultation - June 2025
MAP 5 - PRINCIPLE 2 ACTIONS
DRAFT FOR CONSULTATION JUNE 2025
The Guiding Aspirations for this Structure Plan Area identify that land will need to be dedicated for a commercial centre, and may involve relocating or rezoning this Emerging Activity Centre.
Rezone land for employment purposes (Action 2.1B)
Advocate for changes to the Environment and Food Production Area (Action 2.1D and 2.1 E)
Victor Harbor Council boundary
Urban Growth Boundary
Arterial and distributor roads
Emerging Activity Centre Location
Structure Plan Area (see Map 4)
Centre Hierarchy
Regional Centre
Neighbourhood Centre
Local Centre
Rezone for Employment Purposes (Action 2.1B)
Future Commercial Land (No actions proposed)
Future Employment Land
Areas which are subject to actions within Council's Urban Growth Management Strategy:
Short term actions
Medium term actions
PAGE 43
In relation to the economy, the following key changes have been made:
New actions that seek to change the trajectory of Victor Harbor by being a more attractive, dynamic and sustainable place for young people to live, work and study
Securing a future activity centre at Encounter Bay by improving planning controls for a site that was previously identified for this purpose.
Focusing the potential for new commercial land within the 'priority growth area' and removing any actions relating to rezoning commercial land on Adelaide Road / Waterport Road.
Increase the area envisaged for future employment purposes to the north of Waterport Road and prioritise the rezoning of this land.
Ensuring that key farming or primary production activities are identified and protected from incompatible land uses.
Consider land capability with rezoning changes to Bedrock Rd on Waterport Rd
Access/safety challenges along Waterport Rd Consider rezoning employment but not res
High % of risk along Waterport Rd Boundaries can't expand
Show us which changes you support with a green dot and which changes you don't support with a red dot
Highlight and support our Indigenous culture
Backport area centre - yes I might live here small
Support protects our Wildlife heritage


Key Changes made to the Strategy – Making sure se
nd infrastructure meet demand
Previous Version - September 2024
Current Version for Consultation - June 2025
MAP 5 - PRINCIPLE 3 ACTIONS
DRAFT FOR CONSULTATION SEPTEMBER 2024
MAP 6 - PRINCIPLE 3 ACTIONS
Show us which changes you support with a green dot and which changes you don't support with a red dot
In relation to servicing and infrastructure, the following key changes have been made:
• Adding a new action which seeks to prepare a business case for Council to support the provision of childcare, particularly for children under the age of three.
• Reduce the extent of land identified for rezoning to the Community Facilities Zone, to prioritise Council resources on providing new infrastructure rather than rezoning to recognise existing infrastructure.
• Focus detailed infrastructure investigations on the priority growth area on Welch Road / Armstrong Road / the Ring Route and the future employment area on Waterport Road.
Victor Harbor Council boundary
Urban Growth Boundary
Arterial and distributor roads
Regional Freight Route (Action 3.7A)
Investigate Pedestrian Activated Crossing
Priority Pedestrian Network
Proposed Hindmarsh River Adventure Trail
Inman River Trail Extension
Other Link Trail Options
Investigate infrastructure requirements
Community Facilities Zone
Investigate feasibility to locate new recreation facilities on existing government or utility owned land (Action 3.2C)
Investigate infrastructure requirements (Action 3.3A)
Investigate infrastructure requirements (Action 3.3B)
Former Landfill site
Advocate for river crossing (Action 3.5B)
Undertake a Code Amendment for community facilities and infrastructure purposes (Action 3.1H)
Future Employment Zone
Infrastructure Zone
Areas which are subject to actions within Council's Urban Growth Management Strategy:
Short term action
Medium term action
PAGE 37
PAGE 51


Key Changes made to the Strategy – Protecting and enhancing our environment
Previous Version - September 2024
Current Version for Consultation - June 2025
Show us which changes you support with a green dot and which changes you don't support with a red dot
MAP 6 - PRINCIPLE 4 ACTIONS
DRAFT FOR CONSULTATION SEPTEMBER 2024
MAP 7 - PRINCIPLE 4 ACTIONS
DRAFT FOR CONSULTATION JUNE 2025
In relation to the environment, the following key changes have been made:
• Committing to establish key wildlife corridors, particularly an east to west corridor that links the Hindmarsh and Inman Rivers in order to protect and enhance biodiversity.
• Add actions which seek to facilitate opportunities for Native Vegetation Agreements and identifying locations suitable for inclusion on a Native Vegetation Credit Register, in line with feedback from the Native Vegetation Council.
• Updating the mapping within the Strategy to identify areas with known or potential biodiversity values.
Green corridors in the housing development pipeline
Protection of Reserves crucial (biodiversity act)
Waterbodies + Biodiversity mapping are same colour
Since being urban land has been built, stormwater is directed to the river

Key Changes made to the Strategy - Retaining our character and heritage

Previous Version - September 2024

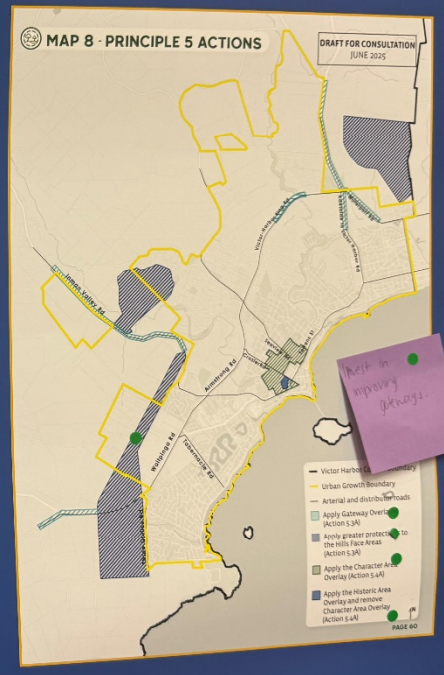


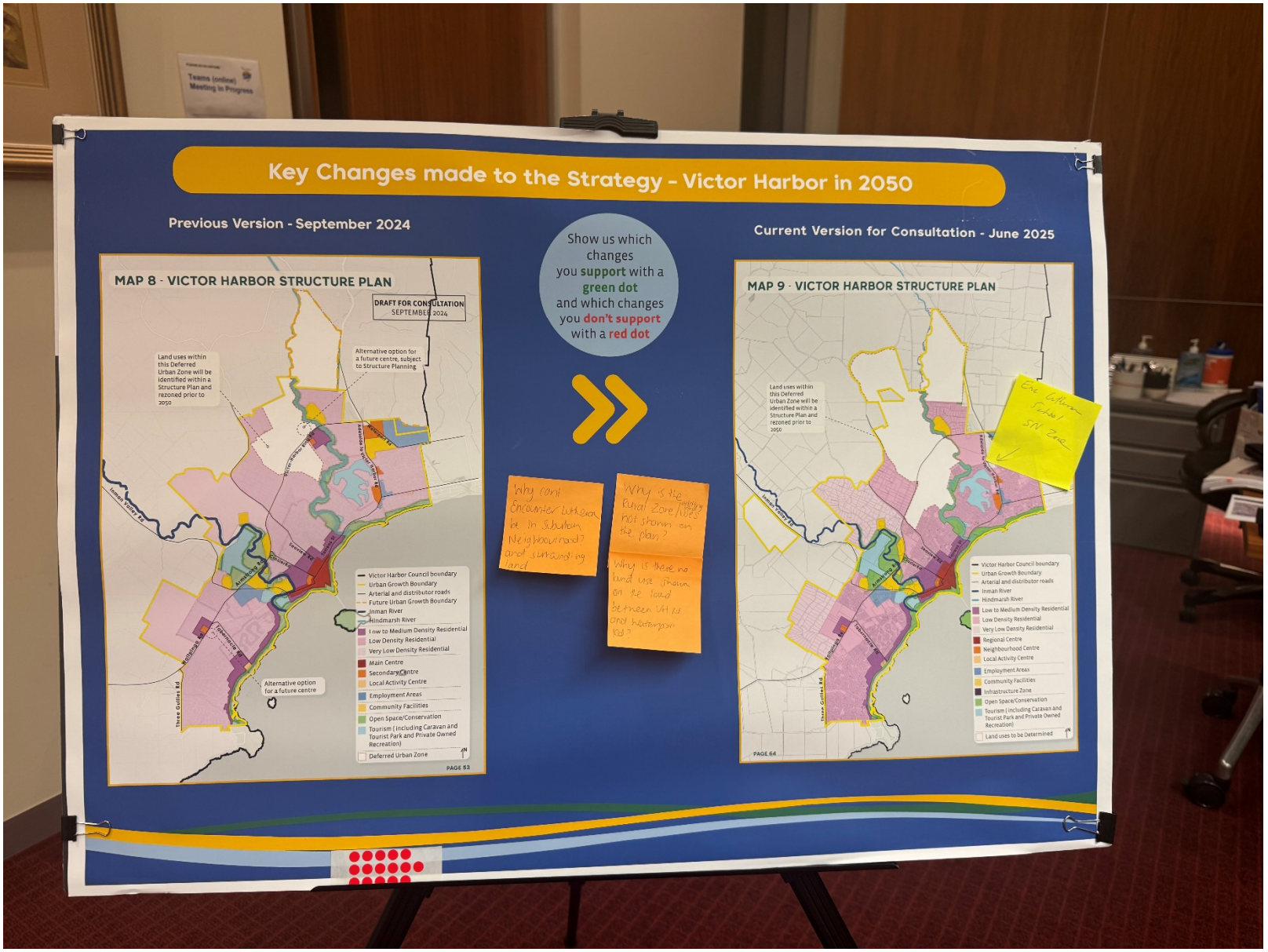
Show us which changes you **support** with a **green dot** and which changes you **don't support** with a **red dot**

In relation to protecting Victor Harbor's character and heritage, the following key changes have been made:

- **Expanding the area where future 'gateway' policies may apply,** in order to reflect the recent changes to the urban growth boundary implemented by the State Government.

Current Version for Consultation - June 2025




Key Changes made to the Strategy - Victor Harbor in 2050
Previous Version - September 2024
Current Version for Consultation - June 2025
Show us which changes you support with a green dot and which changes you don't support with a red dot
MAP 8 - VICTOR HARBOR STRUCTURE PLAN
DRAFT FOR CONSULTATION SEPTEMBER 2024
Land uses within this Deferred Urban Zone will be identified within a Structure Plan and rezoned prior to 2050
Alternative option for a future centre, subject to Structure Planning
Alternative option for a future centre
Victor Harbor Council boundary
Urban Growth Boundary
Arterial and distributor roads
Future Urban Growth Boundary
Inman River
Hindmarsh River
Low to Medium Density Residential
Low Density Residential
Very Low Density Residential
Main Centre
Secondary Centre
Local Activity Centre
Employment Areas
Community Facilities
Open Space/Conservation
Tourism (including Caravan and Tourist Park and Private Owned Recreation)
Deferred Urban Zone
PAGE 53
Why can't Encounter Lutheran be in Suburban Neighbourhood and surrounding land
Why is the Rural Zone (uses) not shown on the plan?
Why is there no land use shown on the land between VH Rd and Waterport Rd?
MAP 9 - VICTOR HARBOR STRUCTURE PLAN
Land uses within this Deferred Urban Zone will be identified within a Structure Plan and rezoned prior to 2050
Encl Urban Settlement SN Zone
Victor Harbor Council boundary
Urban Growth Boundary
Arterial and distributor roads
Inman River
Hindmarsh River
Low to Medium Density Residential
Low Density Residential
Very Low Density Residential
Regional Centre
Neighbourhood Centre
Local Activity Centre
Employment Areas
Community Facilities
Infrastructure Zone
Open Space/Conservation
Tourism (including Caravan and Tourist Park and Private Owned Recreation)
Land uses to be Determined
PAGE 64

APPENDIX 2. DETAILED SUMMARY OF ALL FEEDBACK

SUMMARY OF WRITTEN FEEDBACK - SUBMISSIONS AND SURVEY

FEEDBACK RECEIVED THROUGH SUBMISSIONS

Category	Number of Mentions	Feedback
Housing	8	Do not support high density development, particularly in existing rural living areas. Examples of high-density development included Oceane.
	8	Support the action to reduce the extent of rural living investigation areas
	7	Plan for the right mix of family and young person housing
	7	Consider low rise residential development in the main street of Victor Harbor / facilitate mixed-use development
	3	Do not support rezoning land within the Deferred Urban Zone to the Rural Living Zone
	3	Support and look forward to the progress of a Structure Plan for the Priority Growth Area and would like to see this Structure Plan support residential development to the south of the ring route
	1	Supports the balanced approach to housing
	1	Would like the Inman Valley Road growth area identified within the GARP to be provided more consideration in the UGMS
	1	Don't focus on one corridor or area for growth
	1	Advocate for policies - similar to the former Commonwealth-State Housing Agreement - that provide grants or stamp duty exemptions to first home buyers purchasing existing homes
	1	Support diversity of housing and keep any one housing type under 40% of new builds
	1	Limit clustering of retirement villages
	1	UGMS should elevate urban consolidation by prioritising infill development
	1	Incentives should be considered for mixed-use and medium-density housing
	1	Appreciates Council removing intent to rezone land to Community Facilities Zone and requests that the land at 4595 Victor Harbor Road be rezoned to Suburban Neighbourhood Zone
	1	Does not support any development on Waggon Road, north of the ring road
	1	No new "55 aged plus" estates
	1	There is an opportunity for the Regional Key Worker Housing Scheme to support housing opportunities in CVH
	1	The UGMS does not consider affordable housing and non-commercial housing

Category	Number of Mentions	Feedback
Housing	1	Local government should manage the impacts of short stay accommodation on housing
Economy	1	Be proactive in attracting younger generations, ensuring Victor Harbor remains a balance, multi-generational community with a sustainable workforce
	1	Consider imposing a vacant land differential rate on vacant industrial or commercial sites - through a targeted approach
	1	Encourage the implementation of an 'out of centres' policy focusing growth within and around the CBD to avoid splitting the towns commercial base
	1	Support the creation of smaller neighbourhood shopping precincts with small-format supermarkets and daily essential services, while keeping major hospitality and large retail facilities concentrated in the CBD
	1	Support initiatives that attract younger generations to live, work and invest in Victor Harbor
	1	Support rezoning Waitpinga Road as a local commercial centre for essential services and modest retail - avoid large hospitality venues
	1	Support rezoning for employment purposes north of Waterport Road
	1	Recommend that a commercial balance is struck between any future employment land area and recommended green belts etc.
	1	UGMS should acknowledge the catchment that the centre serves
	1	Retail as a sector should be specifically mentioned (rather than collectively referring to activity centres)
	1	The Strategy doesn't clarify what 'greater utilisation is' in the context of the regional centre
	1	The Blue Water Economy should be replaced with the retail sector
Infrastructure	7	A new intersection on Armstong Road will impede quality of life and threaten native vegetation
	7	Traffic needs to be considered (acknowledging that further traffic investigations are included in the UGMS)
	7	Rezoning for employment near Waterport Road needs to consider flooding, stormwater and inadequate road conditions.
	1	Consider extending SA Water infrastructure to Rural Living areas within the Priority Growth Area
	1	Council should plan for end of life care, including palliative care, rehabilitation facilities and Voluntary Assisted Dying
	1	Develop a detailed Infrastructure Staging and Funding Plan within 12 months, including cost breakdowns, timelines and developer contributions (including digital infrastructure)
	1	Support the detailed infrastructure investigations for the Priority Growth Area

Category	Number of Mentions	Feedback
Infrastructure	1	Explore bold, long-term solutions to overcome Victor Harbor's fundamental connectivity challenges to provide the region with the same type of major highway connections that underpin growth in other major regional towns such as Mount Barker and Murray Bridge
	1	Prioritise childcare facilities and ensure that zoning and infrastructure planning includes provisions for early childhood education centres
	1	Reevaluate current restrictions on heavy freight to ensure efficient regional logistics while maintaining safety and infrastructure integrity
	1	Support the protections of freight corridors
	1	Recognise that proposal such as the Sellicks Hill / Myponga road corridor may further exacerbate freight challenges
	1	Encounter Lutheran (south of Waterport Road) intends to pursue a rezoning to accommodate the logical expansion of their existing campus and to support growing demand for educations services.
	1	Encounter Lutheran do not support the revised 2025 version of the UGMS which removes the 'Community Facilities Zone' from all land owned by the college and no longer proposes commercial uses across the northern portion of Lot 10 Adelaide Road.
	1	DEW recommends that stormwater discharge to the coast is minimised via WSUD etc so that sensitive benthic habitats within the Encounter Marine Park Habitat Protection Zone are protected and recommend that action 4.6B be expanded to include this outcome.
	1	EPA encourages use of the Stormwater Management Overlay, particularly for any areas flagged for the intensification of urban development and especially in the vicinity of environments that are sensitive to pollutant typically found in urban run off.
	1	There should be a buffer zone along Waitpinga Road and the Regional Freight Route and a new action should be added to the UGMS to create such
	1	Road set-back buffer zones should be considered as potential off-set land within the Native Vegetation SEB Credit Register
	1	Consider implementing a Victor Harbor Bike Bus Network, drawing from successful pilot efforts at Port Elliot Primary School and presented at the Youth Climate Summit
	1	SAPNs substation (4 Day Road) is situated within the Priority Growth Area and future investigations should consider the interface with this station. Land may be required for a new substation to meet increasing demand for electricity.
	1	CVH should provide bus stops to increase public transport patronage

Category	Number of Mentions	Feedback
Infrastructure	1	UGMS should consider a park n ride in consultation with DIT
Environment	7	Improve the mapping relating to vegetation to better represent high value environmental assets and protect vulnerable and listed species in the area
	7	Development reduces tree canopy
	7	Development is having a negative impact on Hindmarsh River. Climate change adaption plans and inundation zones should be considered when investigating overall watershed and stormwater impacts. Particularly notes the impact of Oceane on the Hindmarsh River.
	7	Environmental Impact Statements should be prepared to inform growth areas
	7	Environmental Assessments should precede Infrastructure Investigations
	7	Focus on the protection of existing wildlife corridors, heritage bush and remnant paddock trees - rather than creating new
	7	Map 7, Principle 4 actions - this map lacks detail of local significant biodiversity assets
	1	Clarify how biodiversity credit schemes or a Native Vegetation Credit Register will work so businesses know their obligations and opportunities
	1	Introduce incentives - rebates, faster approvals - to help businesses go green
	1	Develop a collaborative Fleurieu regional approach to establish South Australia's first Regional Circular Economy Hub
	1	DEW is in the early stages of planning for a Code Amendment that will support action 4.6A in the UGMS
	1	DEW supports action 5.4
	1	EPA encourages Council to review the Environment Protection (Waste to Resources) Policy 2010 and consider including initiatives to support the circular economy in its urban growth strategy
	1	Council should apply the mitigation hierarchy within the UGMS (avoid, minimise, rehabilitate/restore, offset)
	1	Include a nature positive target to ensure that the City of Victor Harbor should be back to 2020 levels by 2030, and 'fully recovered' by 2050
	1	The Native Vegetation Council recommends updating the definition of 'Unit Biodiversity Score'
	1	Enhance the concept of linear green corridors that serve dual functions - biodiversity protection and active transport routes

Category	Number of Mentions	Feedback
Character	7	The 'State is failing to protect the uniqueness, character and charm of Victor Harbor by enabling a mechanism for high density development without adequate protection for either environment or the lifestyles of existing residents and property owners'
	7	Character and heritage areas should apply to our entire Council are not just some zones.
	2	Maintain strong design standards to keep development sympathetic to local character
	1	Provide clarity on gateway policies to preserve town identity while allowing modern branding
	1	Support the Hills Face Protection and request further consultation regarding where the topographic line is applied
	1	The Gateway Overlay should be applied to Waitpinga Road and the Gateway Overlay should include 'set-back buffer zones' and policies which prevent colorbond fencing
Other	7	Indicated the GARP supports poor decision making
	3	General support for the Strategy overall
	1	Alexandrina Council would like to collaborate in relation to coordinating land and infrastructure for economic developments and work together to collaborate on State policy
	1	Alexandrina Council are finalising the South Coast Growth Strategy and preparing a Recreation and Open Space Strategy
	1	Commit to a formal review of growth targets every 3-5 years, adapting projections to shifting economic and demographic realities
	1	Publish annual reports tracking: land supply, development progress and reasons for delays
	1	Publish plain-language quarterly updates on UGMS progress and what's changing
	1	UGMS does not align with GARP
	1	Request for the urban growth boundary to be moved (despite EFPA) as EFPA is intended to prevent residential, but is not intended to prevent employment development

APPENDIX 3. SUBMISSIONS

30 July 2025

Ms Victoria MacKirdy
Chief Executive Officer
City of Victor Harbor

Email: localgov@victor.sa.gov.au

Dear Victoria

Re: City of Victor Harbor – Draft Urban Growth Management Strategy

Thank you for the opportunity to comment on the amendments made to the draft *Urban Growth Management Strategy* (UGMS) in response to community consultation.

It is recognised that since the release of the first iteration of the UGMS, the State Government has endorsed the Greater Adelaide Regional Plan (GARP) and that the UGMS has subsequently been amended to align with the actions and priorities of the GARP, where relevant.

Housing

Alexandrina supports the balanced approach that Victor Harbor has identified in the UGMS of identifying areas for infill development and suitably located sites for greenfield growth, as well as retaining areas for rural living lifestyle options, to ensure diverse housing supply and form that is age inclusive.

As you are aware, late last year, Alexandrina Council consulted on its draft South Coast Growth Strategy (SCGS) which identified areas to accommodate future population growth in Goolwa, Middleton, Port Elliot and Hindmarsh Island. Feedback from the community as well as the outcome of the GARP are currently being considered; it is expected that the SCGS will be finalised by the end of 2025. An updated Strathalbyn Town Plan is also likely to replace the current Strathalbyn Town Plan 2014-2024 to reflect housing demand in the township.

Together with the UGMS, it is considered that these pieces of work will be important in understanding our shared Fleurieu housing and other land use needs.

The Economy/Employment

The draft UGMS has proposed an increase to the future employment area, adjacent to the Regional Freight Route. We are keen to continue to work with Victor Harbor in coordinating the provision of suitably zoned land and infrastructure for a range of different economic developments to provide opportunities for young families. Alexandrina Council's *Productive Economy Paper* has highlighted some useful

information for strategic decision making in respect to employment lands that also cross our administrative boundaries.

Services and Infrastructure

As noted by the UGMS, Councils are required to deliver housing strategies to ensure land use and infrastructure is planned for in an orderly and economic way, and ultimately, a financially sustainable way. Alexandrina Council will continue to work with Victor Harbor Council in understanding the future infrastructure demand, including community and social infrastructure, across the Fleurieu region and to understand areas where we can form partnerships.

Environment

We continue to support the targets identified in the UGMS for the improvement of the natural environment and biodiversity, particularly in our coastal areas. In particular, we anticipate that the Structure Plan for the Priority Growth Area will consider and seek to protect the extent of native vegetation across the Area.

Landscape Character, Amenity and Heritage

We continue to support Victor Harbor's objectives to introduce better planning policy to protect important landscapes, character areas and heritage and would be happy to work together to reintroduce policies to protect these important features or advocate for improved State policy. Any infill opportunities will need to consider new areas proposed for character or heritage protections.

Recreation and Open Space

As you are aware, Alexandrina Council is in the process of preparing a Recreation and Open Space Strategy which is expected to be released in Q4 2025.

Perhaps what becomes clear in considering Victor Harbor's UGMS, is the reinforcement of the benefits of increased collaboration, resource and information sharing between our organisations and continued dialogue about the opportunity to establish a Planning Subregion and/or a Joint Planning Board.

Thank you again for the opportunity to comment on the second stage of this very important strategic document. We look forward to continuing to work collaboratively with you on the many shared opportunities and challenges identified.

If you wish to discuss any of the comments, please do not hesitate to contact Kylie Weymouth, Manager Strategic Development by email kylie.weymouth@alexandrina.sa.gov.au

Yours sincerely



Andrew Macdonald

From: [redacted]
To: City of Victor Harbor; David Read
Subject: IREC40044125 - SM18.20.030 - UGMS Your Say Submission. Inman Valley Rd
Date: Monday, 30 June 2025 9:11:55 AM

North Face Fleurieu Estate

Subject: Support for Proposed Housing Development for Families. Inman Valley Rd.

Dear City of Victor Harbor

We write to express strong support for the development of a new housing initiative within the Existing Deferred Urban Zone located on Inman Valley Rd**,** and ask that the area be indicated as a Growth Area within the UGMS. We ask that a Structure Plan be created that will support a family focused housing development. We note that the area has not been recognised as a Priority Growth area by council, but ask that it be given somewhat more consideration than outlined in the UGMS.

We envisage a North Face Housing Estate designed specifically to meet the needs of young families in our community. Our community is facing a significant shortage of accessible, well-designed homes suitable for young families as priority appears to have been given to 55+ communities.

Young families are the cornerstone of a vibrant, sustainable community. By providing housing that meets their needs, we can ensure a healthy demographic balance, stimulate the local economy, and foster long-term social cohesion.

Young families are increasingly prioritising lifestyle alongside affordability when choosing where to live. This development will incorporate well-designed outdoor spaces that support a range of family activities, including:

- Playgrounds and nature-based play areas that promote physical activity and cognitive development
- Shared open spaces for family recreation, informal sport, and community events
- Walking and cycling trails that will connect to nearby parks, and reserves.
- Natural green buffers and biodiversity zones, offering hands-on learning and environmental awareness for children
- Family picnic areas and community gardens, encouraging outdoor interaction, sustainability, and local food culture

These features are intentionally designed to encourage outdoor activity, active transport, and positive health outcomes
This project creates an environment that supports family life, social connection, and wellbeing by ensuring that homes are close to green space and recreational facilities. It reflects the strategy's commitment to "designing places that promote active lifestyles, mental health, and wellbeing."

By targeting young families, this development helps rebalance Victor Harbor's ageing demographic profile and responds to a recognised gap in housing supply for key workers and first-home buyers.

Key Features of the Vision

- Affordable pricing through smart design and material efficiency
- Mixed housing options including 2–4 bedroom homes and townhouses
- Family-friendly infrastructure such as green spaces, playgrounds, and walking paths
- Sustainable design, incorporating energy-efficient building practices and renewable energy systems

Community and Economic Benefits

This development initiative has far-reaching benefits beyond housing:

- It strengthens local schools, clubs, and health services through population renewal
- It supports Victor Harbor's economy by attracting and retaining young workers and professionals
- It reduces long-term infrastructure strain by encouraging new growth areas, while simultaneously bringing new life to the Encounter Bay and Central Victor Harbor areas.
- It builds neighbourhood pride and fosters long-term residency and local engagement

We respectfully urge the council to support this proposal. In doing so, we take a critical step toward building a more inclusive, future-ready community where families can thrive.

We welcome the opportunity to work collaboratively with council planners, local residents, and other stakeholders to ensure that the final development reflects shared community values and priorities.

Thank you for your consideration.

Yours sincerely,

[redacted]

Sent from my iPhone



Residents & Property Owners Feedback (Banksia Lane Precinct)

Draft Urban Growth Management Strategy
(Stage 3 Consultation)

City of Victor Harbor

9 July 2025

We acknowledge the Ramindjeri and Ngarrindjeri people as the Traditional Custodians of the land and surrounding waters of the region in which we live. We pay respect to Elders past, present, and emerging, and extend this respect to all Aboriginal and Torres Strait Islander people.

9 July 2025

Dear Council,

RE: Feedback on Draft Urban Growth Management Strategy (Stage 3 Consultation) City of Victor Harbor.

This submission has been prepared by residents and property owners (rate payers) in the [redacted] and [redacted].

Preamble
As neighbours we share a common experience. Our families have worked hard to invest into living within a rural, nature positive environment and we share real community pride in protecting and living in our patch. Most of these rural living blocks are larger than the "average" suburban block and represent lifelong investments and desire to live in the rural and country "feel" that Victor Harbor has offered to its community for many years. Simply it's "why we live where we live".

As neighbours we have watched on as urban development has slowly eroded the character of our city, increasingly presenting the entrance to our city as a high-density urban living and commercial location, similar to the fringes of Mount Barker, inner Adelaide and other city locations.

We seek to raise Council's and the State Government's awareness to the beauty and character of Victor Harbor. A treasured rural and costal town loved by South Australians. Victor Harbor should not become another Mount Barker, to be changed forever into a high density, urban concrete commuter town. "Victor" is a place to live life, smell the fresh sea air, walk the beach and experience the trees, birds and wildlife our community treasures dearly.

This is not an anti-development submission. It's a plea to please get it right.

Please respect the residents that live here, why they choose to live in Victor Harbor and most importantly please protect the precious environment & wildlife that share our properties.

Key themes of our submission

- Our homes are surrounded by high value environmental assets, remnant bushland and wildlife corridors. Many of these assets are poorly represented in the development plans & maps provided in the DUGMS documentation.
- Proposed investigations for a further road intersection on Armstrong Road near the Fuller East Road intersection potentially threaten high value native vegetation on Banksia Lane, which has never been a through road, even though named as a road.

- Any new road via a further road intersection on Armstrong Road would be a major impediment to quality of life through increased vehicle traffic, additional noise, fracturing of the wildlife corridor (Banksia Lane) and reduction in overall tree canopy and green space.
- Heritage scrub blocks (see Figure 1) contain vulnerable and listed species and should be protected for the future.
- Current road infrastructure (Waggon Road South), Fuller Road and Days Road are poorly maintained and unlikely to be able to cope with higher levels of traffic, particularly if fed from a new Armstrong Road intersection. We note proposed infrastructure investigations should consider this and other traffic factors.
- We understand that investigations into infrastructure will consider power, water and sewer needs based on numbers of expected new residents and developed blocks, but this is likely to be highly variable depending on the density of dwellings approved and have implications for all services.
- Development density should be thoroughly investigated. High density dwelling urban suburbs "in filled" into the existing rural living zones will, in our opinion, severely detract from the character and environment in which we live (and from the city as a whole), which currently attracts visitors and tourism for these rural characteristics. In our view, visitors come to Victor Harbor to experience the rural feel, nature and coastal beauty, not for a high-density urban experience.
- We appreciate that the City of Victor Harbor is essentially hamstrung by the planning directions of the GARP and that the State is effectively laying down the "development" law. However, in doing so, we feel the State is failing to protect the uniqueness, character and charm of Victor Harbor by enabling a mechanism for high density development without adequate protection for either the environment or the lifestyles of existing residents and property owners.
- The plan is suggesting that tree canopy achieve 30% by 2030. Our observations are that high density urban development's generally result in canopy loss, particularly where native vegetation clearance for roads (such as could happen with Banksia Lane), paddocks and infill of larger blocks tend to reduce the overall planting space on dwelling allotments due to their small size and inevitably large house footprint, leaving small reserves and inadequate street planting space for tree species that often provide little habitat for local birds and animals.
- The plan seeks to reduce the overall median age of the population. We note that recent Victor Harbor developments promote an over 55's demography, which seems counter intuitive. Whilst we all have concerns over the cost of housing, this aspect is beyond our ability to control or comment on in this submission, but it would be to the City's advantage to plan for the right mix of family and young person housing (which may not be high density "city fringe" dwellings!).
- Intense development is already having a negative impact on the Hindmarsh River. The River is a key local environmental asset and should be protected from encroaching urban development. Climate change adaptation plans and inundations zones should be considered when investigating overall watershed and stormwater impacts from high density urban development.
- Consider creating a "slow zone" for Waggon Road, where residents, walkers and cyclists can share the road, noting the current condition of Waggon Road and the road shoulder does not support walkers or cyclists.

Figure 1. Local Map Victor Harbor



Map data s comp ed from a var ety of sources and hence ts accuracy s var ab e.

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N

0 370 Kms

Comp ed: 1-Ju -2025
Generated at: www.naturemaps.sa.gov.au
Datum: Geocentr c Datum of Austra a, 2020
Project on: Web Mercator (Aux ary Sphere)

Government of South Australia
Department for Environment and Water

Figure 1. *Extract from nature maps (SA Government) highlighting the general area of interest for this submission and highlighting known wildlife corridors, heritage vegetation, rare plant species and rural character of the Hindmarsh River valley.*

Feedback on "Summary of Key Changes to the Draft Urban Growth Management Strategy" For Consultation Document.

<u>Key Changes made to the Strategy relating to Housing</u>

- Focus on the existing DUZ in the Welch Rd/Amstrong Rd/Ring Route/Waggon Rd will place more pressure on an already "stressed" Hindmarsh River Valley, with increased potential pollution and negative impact on existing biodiversity in the river valley, noting the current unacceptable environmental impacts of the Oceane development on the Hindmarsh River, highlighting the complete failure of the current planning approvals system. This communicates little confidence to the community of a rigorous planning and development process.
- We support the action to reduce the extent of rural living investigations area. Minimum allotment sizes should be maintained and wherever possible high level of green space, allotment canopy and vegetation maintained to assist city cooling for a hotter future climate and maintain the rural ambiance of our city.
- We feel **"Acknowledging"** the GARP greenfield land supply areas provides support to poor decision making by the State Government, who seem focused purely on numbers rather than modern, good planning assessment with vision for a high-quality living experience for existing residents as well as future residents.
- **Key Growth Areas for Housing**. Any future investigations into these designated areas (Map 3, Principle 1 Actions) should commence with a detailed EIS. This is a fragile river environment. Planning should consider beyond current 1:100 year flood events and consider greater setbacks from river plains. Interstate rainfall events are clearly showing the inadequacy of stormwater and development approvals to cope with a changing climate.

<u>Key Changes made to the Strategy – A Priority Growth Area</u>

- **Priority Growth Area**. Map 4 – Priority Growth Area Structure Plan (Preliminary) highlights "investigate new intersection to Armstrong Rd". This provides lack of detail on why, what specific location and any benefits and has created great angst (through inclusion of an arbitrary circle/zone on a map) for local residents who fear increased noise, traffic, congestion, native vegetation clearance and impact on existing wildlife corridors and rural living.
- **Reduce the extent of Rural Living Investigations Area.** We support this general approach, **<u>BUT</u>** suggest a detailed, independent environmental assessment (EIS) be completed (including climate, noise and residential impact), before infrastructure needs are considered, as this may further reduce the locations that are in fact viable for any form of development.

Key Changes made to the Strategy – Addressing the GARP

- **Addressing the Greater Adelaide Regional Plan**. We unanimously feel the State Government has set numbers (people) for development in our region via a poorly informed desk top analysis, with little or no consideration for existing residents, local environment, biodiversity, impacts of climate change and the full cost of infrastructure needs. This is an institutional and bureaucratic "plan over the top" failure of the new statewide approach to planning with little or no experience in or understanding of local issues. We expect better performance from our State Government and suggest there is a need for a greater involvement of local residents, in addition to local government representation. We hope these comments can help to shape a more robust and effective State planning system.

Key Changes made to the Strategy – Planning for the Economy & Servicing and Infrastructure.

- **Planning for the Economy**. Rezoning, particularly in the Waterport Road zone needs to consider flooding, stormwater, existing residents, and currently inadequate road conditions for increased commercial traffic. The land between Waterport Rd and Adelaide/Victor Rd has high wetland conservation and education value. We should not sacrifice this for development.
- Consider appropriate low rise residential development in the main street of Victor Harbor to accommodate further residential living space. The main street has exhibited commercial and building condition decline for some time, and whilst still has heritage value does present opportunity for a "face lift" appropriately designed and constructed for a mix of commercial businesses and urban living.

Key Changes made to the Strategy relating to the Environment

- **Strategy Relating to the Environment**. We support the commitment to establish key wildlife corridors. We note reference to updating of mapping biodiversity values. We suggest focus be firstly on protection and enhancement of **existing** wildlife corridors, heritage bush and remnant paddock trees. This is a key and well understood principle of environmental management – first protect what you have. The maps and plans provided fail to highlight existing environmental assets within the proposed development zone. These assets include locally rare and threatened plant species and communities, significant habitat for declining woodland bird species, and significant existing corridors for wildlife that have not been mapped or recognised in the documents provided. Furthermore, these areas provide tree shading and cooling for existing residents which will be vital for future city living in a changing climate.
- **Protecting and enhancing our environment. Map 7, Principle 4 Actions**. This map is too small and lacking in sufficient local detail of local significant biodiversity assets. This relates to our comments regarding the need for a rigorous and independent EIS BEOFRE development zones are considered and further investigated.

Key Changes made to the Strategy relating to Protecting Character and Heritage

- **Protecting Character and Heritage.** Wording and communication to community during periods of proposed change is very important. "Expanding the area where future gateway policies may apply" is difficult to understand wording. We don't know what it means. In our view the GARP suggests to us a message from the State Government that "you will accept development at all costs". "You will do as you are told and accept your percentage of statewide urban development". Our view is that will be at the considerable cost to the character and heritage of the Victor Harbour region by consuming valuable arable land containing environmental and character settings. We strongly support sufficient investigations to document and truly understand the potential impacts on character and heritage and avoid tokenistic attention to the main issue here – rapid, poorly considered and underfunded development that fails to adequately consider local environmental, residential and community sentiment impacts. Map 8 Principle 5 Actions (Celebrating and retaining our heritage) is a good example. In our view the coloured and hashed designated areas should apply to the entire area of the map. Greater protection to the full area, greater protection to regional character and greater protection to the history of our town. Character and Heritage features apply to our entire council area not just some zones. They are at the core of why we live where we live!

Our Suggested Actions

1. Ensure all remnant and high-quality native vegetation and wildlife corridors are protected and not cleared for the sake of "development".
2. Recognise existing heritage agreement vegetation as cornerstone environmental assets to the region.
3. New roads or intersections should consider the noise and traffic increase impact on existing residents and environments.
4. Develop in sympathy with the local environment. High density developments with roofs covering over 80% of an allotment and predominantly black rooves creates a visual eyesore and is not sympathetic to either an attractive and nature positive or "cool" city. Consider appropriate allotment sizes for these locations that enable continuity of vegetation, screening of houses and adequate setbacks as well as a greater % of parks and reserves.
5. Map and plan for 30% tree canopy cover first. Then consider allotment size and low density infill. **Yes** to green space, **No** to a concrete jungle.
6. Consider and maintain existing wildlife corridors. No clearance for convenience.
7. Plan more effectively at the State level. Develop a better, continual feedback planning process from Community to State Government. The population projections by the State Government are unrealistic and present a scenario for enduring negative impact on community and sensitive environments in the locations suggested within the Hindmarsh River Valley. It defies logic that we have reached Stage 3 of Consultation with the State Government not adequately listening to local Government or community, who possesses greater knowledge, data and research at the local level.

Feedback Forms
See Attached

Submission by the following residents and property owners:

Name	Address	Email
[redacted]	[redacted]	[redacted]

Signed:

[redacted]

From: [redacted]
To: City of Victor Harbor
Subject: IREC39962125 - SM18.20.030 - Victor Harbor Stage 3 Consultation on Draft Urban Growth Management Strategy
Date: Tuesday, 17 June 2025 9:03:29 PM

To Whom It May Concern

Thank you for the very detailed Stage 3 Draft Plan. It is wonderful to see detailed information about where Victor is today versus where it needs to be in the future.

I am writing this on behalf of the population that forms the majority of the current population - being those over the age of 60.

Your plans have nothing in them for ageing and end of life care.

When people move to Victor, they continue to age, regardless of the age they were when they first arrived.

There are many opportunities to have beginning to end sustainable, environmental, strategies for those who are currently ageing in Victor and those you are enticing to live in Victor who will then age here.

For example, it would be interesting to investigate with Hometown Australia, their purchase of the Estia nursing home on Tabernacle/Bay Road as an end of life care service that Rosetta and their new Village residents could use when they reach the end stage of their lives and need full nursing care. Having a facility where people from the Villages know others may assist in them moving out of their independent homes to provide housing for others. Nursing home turnover is predicated on a person staying there from 1-3 years - however, those of us who have worked in this industry know that when someone gets 24/7 care, they tend to live longer so there may need to be more nursing homes built, not less.

We also know that SA Health is using the nursing homes as end of life facilities - putting people who are in terminal stage in these facilities to remove bed block in the hospitals. People who are terminal don't die on cue, so they may live up to 1 year beyond what people thought they might live.

There are not enough nursing home facilities in the area to accommodate the needs of the people who are currently reaching that ageing stage.

There are not enough end-of-life facilities in this area to accomodate palliative care or VAD (Voluntary Assisted Dying).

When people know where they are going to end up towards the end of their life, they feel relief to know this. They get quite anxious when they don't know this - as in breaking their hip and suddenly being tossed into a nursing home never again to go back to their independent life. This impacts on their mental health and that of their families.

In relation to these facilities, we need rehabilitation facilities where people can rehabilitate from a hip fracture, stroke, or other significant injury for a period of 2-4 weeks. The people requiring these facilities will be people who don't have others to look after them if they go home. This is a significant part of the population that you have identified in your demographics.

Thinking through the infrastructure required for this community means accepting the whole of life concept, including final years and end of life.

If you would like a more detailed discussion about all of this, I would be happy to provide you with a seminar - free of charge, free of bias - based on my research and academic expertise in this area.

Younger people become older people.

Provide the infrastructure for the older people and you will be providing employment and everything required that younger people need including sporting facilities.

Thank you again for providing the detailed strategy.

Kind regards

[redacted]

Business Victor Harbor Submission:
Victor Harbor Urban Growth Management Strategy 2050

Submitted by: Business Victor Harbor (BVH)
Date: Monday 7th July, 2025

For the attention of Victoria Mackirdy, CEO, Mayor Dr Moira Jenkins, City of Victor Harbor;

"Victor Harbor isn't just growing—it's changing. The choices we make today will decide whether future generations inherit rolling hills and coastal views, or endless rooftops and traffic jams."

Growth decisions today will shape Victor Harbor's identity, economy, and liveability for generations. Getting it right is crucial to protect our town's character, support local businesses, and ensure quality of life for residents young and old.

Business Victor Harbor (BVH) submits this feedback because the stakes of the Victor Harbor Urban Growth Management Strategy 2050 (UGMS) are critical. Growth is coming. How we manage it now will determine whether we preserve the lifestyle, character, and economic resilience that make Victor Harbor unique—or risk losing what sets this town apart.

A thriving business community generates jobs, supports local services, and underpins the economic resilience that allows Victor Harbor to invest in roads, parks, healthcare, and the very lifestyle that draws people here.

BVH appreciates Council's extensive consultation efforts and the opportunity for stakeholders to provide input into this important plan. We particularly thank David Read for his informative presentation to our BVH Board, which was invaluable in shaping this submission.

BVH's Top Priorities for UGMS Implementation

- Infrastructure planning and funding clarity.
- Protection of freight corridors and regional connectivity.
- Diverse housing to support workforce retention.
- Safeguarding Victor Harbor's environmental and scenic values.
- Transparent, frequent communication with the community.

- Supporting childcare as critical economic infrastructure to help attract working families.
- Ensuring new activity centres, such as at Encounter Bay, are carefully staged and integrated with existing commercial areas.
- Encouraging a regional Circular Economy hub to drive sustainable growth and local jobs.

Growth Isn't Just Bricks and Mortar

"Growth isn't just bricks and mortar. It's jobs. Homes families can afford. Clean beaches and hillsides that still look like Victor Harbor."

We commend Council for the depth and ambition of the UGMS. It rightly seeks to provide "a clear strategic framework for how urban growth should be managed over the next 25 years," balancing housing, employment, infrastructure, heritage, and environmental values (UGMS, p. 5).

Council has the power to steer Victor Harbor's future. We're asking you to steer it wisely.

1. Growth Vision and Population Targets: Avoid Becoming Another Mount Barker

The UGMS projects a future population of 25,000–36,000 residents by 2050 (UGMS, p. 18). Even at the lower end, that's a near 50% increase over current numbers.

Victor Harbor's demographics present unique challenges:

- 42% of residents are aged 65 or older, double Adelaide's 19% (UGMS, p. 14).
- Our median age is 60, shaping workforce supply, service demand, and housing needs.
- Persons per household have shifted from an average of 4 several decades ago to approximately 1.7 today, indicating a spreading of the population and the risk of an eventual oversupply of dwellings.

"This isn't just a planning decision. It's about ensuring Victor Harbor grows in a way that keeps its unique character, rather than following the path of rapid growth seen in places like Mount Barker."

BVH's Specific Asks:

- Commit to a formal review of growth targets every 3–5 years, adapting projections to shifting economic and demographic realities.
- Explicitly tie population forecasts to:
    - Workforce availability.

- Housing affordability.
- Economic diversification.

- Consider potential oversupply of dwellings due to changing household sizes in long-term planning.
- Be proactive in attracting younger generations, ensuring Victor Harbor remains a balanced, multi-generational community with a sustainable workforce.

2. Don't Let Growth Stall: How We Avoid Empty Blocks and Lost Time

Focusing growth around Welch Road, Armstrong Road, and the Ring Route makes sense (UGMS, p. 48). But relying on one corridor poses real risks:

- Land banking restricts supply and drives up prices.
- Infrastructure delays stall housing roll-out.
- Poor staging creates disconnected suburbs.

The Makris Encounter Bay Lesson

Victor Harbor learned a hard lesson locally. In the early 1990s, Makris Holdings unveiled a visionary master-planned community for Encounter Bay with mixed-use spaces and open areas.

Decades later, much of the land sat vacant. Only recently did Oakford Estate emerge—but without the vibrant mixed-use precinct originally promised.

The consequences:

- Housing delayed for decades.
- Infrastructure planning left in limbo.
- Lost opportunities for thriving local business hubs.

Vacant Land and Rating Policy Questions

BVH acknowledges that the City of Victor Harbor currently applies a higher differential rate to vacant land to discourage land banking in residential zones. However, it's not clear whether this policy extends beyond residential zones to include vacant industrial, commercial, or retail-zoned land.

BVH's Specific Asks:

- Council should clarify whether the current vacant land differential rate applies only to residential-zoned land, or whether it can also be imposed on vacant industrial and commercial sites.

- Consider expanding differential rating to vacant industrial, commercial, or retail land in designated growth areas. A targeted approach—not a blanket policy—could encourage development in key precincts without unfairly burdening legitimate long-term landholders.
- Mandate detailed staging plans linked to infrastructure timelines for large landholders.
- Implement enforceable "use-it-or-lose-it" provisions for rezoned land to deter speculation.
- Publish annual reports tracking:
    - Land supply.
    - Development progress.
    - Reasons for delays.

3. Infrastructure – The Foundation of Everything

Victor Harbor Road already handles 10,000 vehicles daily (DIT Traffic Data, 2022)—a figure that surges by 50% during peak seasons.

Stormwater systems in older catchments lack capacity for denser developments. Equally critical is the sewage treatment plant's capacity to handle another 8,000 residents.

Mount Barker offers a stark warning:

- A population surge from ~13,700 to over 23,000 between 2010–2021 (68% growth).
- Emergency $9 million sewer upgrades.
- A proposed $100 million expansion still unfunded.

Business SA estimates that delays in critical infrastructure projects can add 15–20% to eventual costs due to inflation and escalation.

BVH's Specific Asks:

- Develop a detailed Infrastructure Staging and Funding Plan within 12 months, including:
    - Cost breakdowns.
    - Timelines.
    - Developer contributions versus public funding.
- Disclose sewage treatment capacity under both UGMS scenarios, and clarify funding plans for necessary upgrades.
- Ensure digital infrastructure is treated as core utility infrastructure.

- Continue detailed infrastructure investigations in the Priority Growth Area.
- Explore bold, long-term solutions to overcome Victor Harbor's fundamental connectivity challenges, including the possibility of duplicating or considering road tunnels between McLaren Vale and Victor Harbor, to provide the region with the same type of major highway or freeway connections that underpin growth in other major regional towns such as Mount Barker, Murray Bridge, Port Pirie, Port Augusta, Whyalla, Port Lincoln, the Riverland, and the South East.

4. No Internet? No Business.

Digital connectivity is now as crucial as roads or water. The ABS reports 83% of regional businesses depend on digital tools (ABS, 2021), yet black spots persist across Victor Harbor's outskirts.

BVH's Specific Asks:

- Recognise digital infrastructure as essential infrastructure.
- Actively secure funding through programs like the Regional Connectivity Program.

5. Keeping Victor Harbor Employed and Supporting Working Families

Tourism contributes over $160 million annually (Tourism Research Australia, 2023). Yet businesses face obstacles:

- Rising commercial rents.
- Limited affordable industrial and retail spaces.
- Soaring freight costs.

A key factor in ensuring a balanced economy is making Victor Harbor more than just a "dormitory" town, where people only sleep but commute elsewhere for work. Without local job opportunities, neighbourhood services, and family-friendly infrastructure, we risk becoming a residential hub with few economic drivers.

Childcare as Economic Infrastructure

Childcare isn't just a social service; it's a cornerstone of economic development. Accessible, affordable childcare allows working parents to participate fully in the workforce, attracting young professionals and helping local businesses thrive.

Smaller Retail Precincts & Local Services

BVH strongly supports the development of smaller neighbourhood shopping precincts as Victor Harbor grows. These precincts should include essential services like small-format supermarkets, food outlets, and daily needs stores, ensuring that new residential areas remain well-served without drawing business away from the established CBD. Large hospitality venues such as taverns or big-box retail centres should remain focused around the town centre to prevent the dilution of commercial activity and avoid the issues seen in other regional towns where retail spread leads to business closures in core precincts.

Reinvigorating Existing Housing Stock

A further challenge in housing affordability and urban renewal is the under-utilisation of older housing stock. BVH notes that under the former Commonwealth-State Housing Agreement (CSHA), incentives were offered for first-home buyers purchasing existing dwellings, rather than just new builds. This policy successfully encouraged turnover of older housing, stimulating renovations and local trades like construction, plumbing, electrical, and landscaping.

BVH believes similar incentives could play a critical role in Victor Harbor, allowing younger buyers to enter the market and helping ensure older housing stock does not stagnate while new estates dominate future supply.

BVH's Specific Asks:

- Prioritise childcare facilities in all new development plans to support working families.
- Ensure zoning and infrastructure planning includes provisions for early childhood education centres.
- Work with state and federal programs to secure funding for new childcare facilities as part of growth initiatives.
- Encourage the implementation of an "out-of-centres" policy focusing growth within and around the CBD to avoid splitting the town's commercial base.
- Support the creation of smaller neighbourhood shopping precincts with small-format supermarkets and daily essential services, while keeping major hospitality and large retail facilities concentrated in the CBD.
- Advocate for policies—similar to the former Commonwealth-State Housing Agreement—that provide grants or stamp duty exemptions to first-home buyers purchasing existing homes. This would encourage turnover of older housing stock, support affordability, and stimulate local trades and small business.
- Be proactive in attracting younger generations to live, work, and invest in Victor Harbor, ensuring a sustainable local workforce and vibrant community life.

6. Protecting Freight and Regional Links: Keeping Victor Harbor the Heart of the Fleurieu

Freight corridors keep Victor Harbor's economy moving and ensure we remain the thriving centre of the Fleurieu Peninsula. Currently, heavy freight movement is restricted in Victor Harbor, which can limit the efficiency of regional logistics and impact local businesses that rely on timely deliveries.

BVH's Specific Asks:

- Reevaluate current restrictions on heavy freight to ensure efficient regional logistics while maintaining safety and infrastructure integrity.
- Identify and protect key freight corridors before new residential developments encroach on these routes.
- Integrate freight planning into all urban expansion decisions to support local industry and maintain Victor Harbor's role as a central hub for the region.
- Recognize that proposals such as the Sellicks Hill/Myponga road corridor may further exacerbate freight challenges for Victor Harbor, particularly if Hindmarsh Tiers Road is part of the State's plan. Feedback from freight operators—including the SA Road Transport Association—highlights concerns that:
    - Heavy vehicles and tourists mixing on the same single-lane roads between McLaren Vale and Victor Harbor is unsafe.
    - High costs of acquiring prime agricultural land would strain government budgets.
    - Agriculture—including producers like Fleurieu Milk—could suffer significant impacts.
    - Environmental and community concerns are high.
    - New corridors may fail to solve freight cost constraints for Victor Harbor.

7B. Waitpinga Road: Growth with the Right Balance

BVH supports the UGMS vision for Waitpinga Road as a local commercial centre (UGMS, p. 48).

BVH's Specific Asks:

- Zone the area for essential services and modest retail, like supermarkets and food outlets.

- Avoid placing large hospitality venues like hotels or taverns in this precinct, which are better suited to the town centre.
- BVH supports commercial zoning for essential services to support future residential growth—but only if it avoids out-of-centres developments that strip business and jobs from Victor Harbor's CBD, as witnessed in other regional towns across South Australia.

8. Housing that Works for Everyone

Housing affordability is reaching crisis levels:

- Median prices have jumped from ~$340,000 in 2019 to over $510,000 in 2024—a 50% increase (CoreLogic, 2024).
- Vacancy rates sit under 1.5% (REISA, 2024).

Retirement villages serve a purpose but shouldn't dominate the market. Families and workers also deserve a future here.

"Picture a Victor Harbor where a young family can afford a house with space for kids and a dog. Where tourists spend money in local shops instead of sitting in traffic. Where businesses thrive—and so does our lifestyle."

BVH's Specific Asks:

- Demand diverse housing in all new developments:
    - Detached homes with yard space.
    - Affordable townhouses for first-home buyers.
    - Balanced medium-density—but not overwhelmingly dominant.
- Keep any one housing type under 40% of new builds.
- Limit clustering of retirement villages in single areas.
- Enforce development timeframes to curb speculative holding.

9. Keeping Victor Harbor Beautiful

The UGMS recognizes Victor Harbor's scenic value (UGMS, p. 47). That's not just aesthetic—it's economic:

- 62% of Fleurieu visitors cite nature as their top reason to visit (Tourism Research Australia, 2023).

BVH's Specific Asks:

- Maintain strong design standards to keep development sympathetic to local character.
- Encourage modern architecture that fits seamlessly into local streetscapes.
- Streamline approvals for adaptive reuse of heritage buildings.
- Clarify how biodiversity credit schemes or a Native Vegetation Credit Register will work so businesses know their obligations and opportunities.

10. Sustainability that Businesses Can Afford

- 78% of regional businesses support sustainability goals.
- Yet 42% cite cost as the main barrier (Business SA, 2022).

BVH's Specific Asks:

- Match sustainability standards to project scale.
- Introduce real incentives—rebates, faster approvals—to help businesses go green.
- Partner with businesses and their supply chains to create practical sustainability pathways tailored to the region.
- Develop a collaborative Fleurieu regional approach to establish South Australia's first Regional Circular Economy Hub, inspired by examples such as Bega's Regional Circularity Cooperative Limited in NSW. BVH has already established the Greater Fleurieu Circular Economy Collaborative Working Group to explore this transformative opportunity.

11. Keep Consultation Clear and Frequent

BVH recognises and appreciates Council's openness in the UGMS process. That transparency must continue.

BVH's Specific Asks:

- Publish plain-language quarterly updates on UGMS progress and what's changing.
- Involve business groups early to ensure practical policy-making.
- Provide clarity on gateway policies to preserve town identity while allowing modern branding.

- Ensure infrastructure can handle major festivals and events that power our local economy.

BVH: A Partner for Solutions

BVH isn't just raising concerns. We're ready to help craft solutions. We bring business insights and community knowledge that can turn vision into reality.

Let's Keep Victor Harbor… Victor Harbor

This isn't just a planning decision. It's about ensuring Victor Harbor grows in a way that keeps its unique character, rather than following the path of rapid growth seen in places like Mount Barker.

Growth isn't only about new houses. It's about:

- Local jobs.
- Families finding homes they can afford.
- Landscapes that still look like Victor Harbor.
- Businesses thriving so the community can thrive too.

Council has the chance to write the next chapter of Victor Harbor's story. Let's make sure it's one of balance, prosperity, and the lifestyle we all love. BVH stands ready to help.

Yours in partnership for Victor Harbor's future,

[redacted]
Business Victor Harbor
[redacted]

[redacted]
Business Victor Harbor
[redacted]

[redacted]
Business Victor Harbor
[redacted]

[redacted]
Business Victor Harbor
[redacted]

Government of South Australia
Department for Housing and Urban Development

Planning and Building

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83 Pirie Street
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GPO Box 1815
Adelaide SA 5001
DX 171

Tel 08 7133 2804

21 July 2025

Mr David Read
Strategic & Policy Planner
City of Victor Harbor

By email: dread@victor.sa.gov.au

Dear Mr Read

Thank you for inviting the Department for Housing and Urban Development (the Department) to comment on the Updated Victor Harbor Urban Growth Management Strategy (UGMS) 2050. Apologies for the delay in responding.

I commend council for being proactive in planning for the growth of your community. As you have previously acknowledged, drafting of the UGMS had commenced prior to the final Greater Adelaide Regional Plan (GARP), released in March. As such, a review of the UGMS has found some misalignment between the GARP and UGMS, namely:

- Different population projections and housing targets used
- Land identified as Future Employment in GARP on Victor Harbor Road has not reflected in the UGMS.
- Sites identified in the GARP as Future Greenfield Growth Area on Waterport Road and other smaller sites nearby have not been reflected in the UGMS.

Based on previous discussions with council that the growth strategy is primarily focused on those future urban lands (such as existing deferred urban) that were already identified prior to the release of GARP. Department would like to work with Victor Harbor Council on future updates to the Growth Management Strategy, to ensure greater alignment with GARP, particularly the longer-term growth areas and long-term strategic objectives identified within it.

Thank you for the opportunity to review and provide feedback on this important Council strategic document. We look forward to continuing this work through the development of local housing strategies and the progression of other actions identified within the Greater Adelaide Regional Plan.

If you have any further questions, please do not hesitate to contact [redacted], [redacted] – [redacted] at [redacted].

Yours sincerely

[redacted]

[redacted]

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ABN 87 346 799 642

18 July 2025

City of Victor Harbor
PO BOX 11
Victor Harbor SA 5211

Email – localgov@victor.sa.gov.au

To whom it may concern,

Re: Encounter Lutheran College response to City of Victor Harbor Draft Urban Growth Management Strategy 2050 (UGMS)

This letter has been prepared in response to the Victor Harbor Urban Growth Management Strategy 2050 (UGMS), which was recently updated following feedback received during the community consultation process.

This letter specifically addresses the strategic directions proposed for land owned and controlled by Encounter Lutheran College (the 'College') including its existing campus at 64 Adelaide Road, Hayborough, as well as undeveloped land to the immediate north of the campus at Lot 10 Adelaide Road, Hindmarsh Valley.

The views expressed herein represent the position of the Encounter Lutheran College Board. We strongly believe that land under the control and ownership of the College should be designated for future community facility uses, with the exception of the northern portion of Lot 10, which we propose be reserved for potential future commercial use to support projected population growth in the region as well as the planned expansion of employment related land uses in the immediate locality.

The opinions expressed within this submission have been informed by the current zoning and policy framework applying to the land pursuant to the Planning and Design Code (Version 2025.12 dated 3 July 2025), the Draft UGMS 2050 dated September 2024, the Engagement Summary report on the UGMS 2050 (Draft UGMS phase two engagement), the Draft UGMS 2050 dated June 2025 as well as the strategic directions set out within the recently released Greater Adelaide Regional Plan (the 'GARP').

1.0 Background & Context

All land under the ownership and control of the College is illustrated in ***Figure 1*** over-page.

Established in 2001, Encounter Lutheran College operates from 64 Adelaide Road, Hayborough. Our campus has a frontage to Strawberry Hill Road to the north and Adelaide Road to the west. The College is located within the 'Suburban Neighbourhood Zone' of the Planning and Design Code.

The College is an active and engaged member of the community, and contributes significantly to the wider Victor Harbor City Council, delivering private educational services to families of Victor Harbor and the broader Fleurieu Peninsula region. The College provides educational services to children of all age cohorts including Early Learning, Primary and Secondary school students.

To address significant growth in demand for educational services, the College has employed 80 additional staff over a 12-year period, and our existing campus ground is now approaching full capacity.

In response to this growing demand, the College more recently purchased Lot 10 Adelaide Road, Hindmarsh Valley, which is a significant 28.9 hectare (approx.) land parcel located directly north of our existing campus, over Strawberry Hill Road. Lot 10 has a frontage to Strawberry Hill Road (south), Waterport Road (east) and Adelaide Road (west), offering strategic connectivity and expansion potential.

Whilst Lot 10 Adelaide Road, Hindmarsh Valley is located entirely within the 'Rural Zone', it is the Colleges intention to pursue a land rezoning to accommodate the logical expansion of our existing campus to support growing demand in educational services within the region.

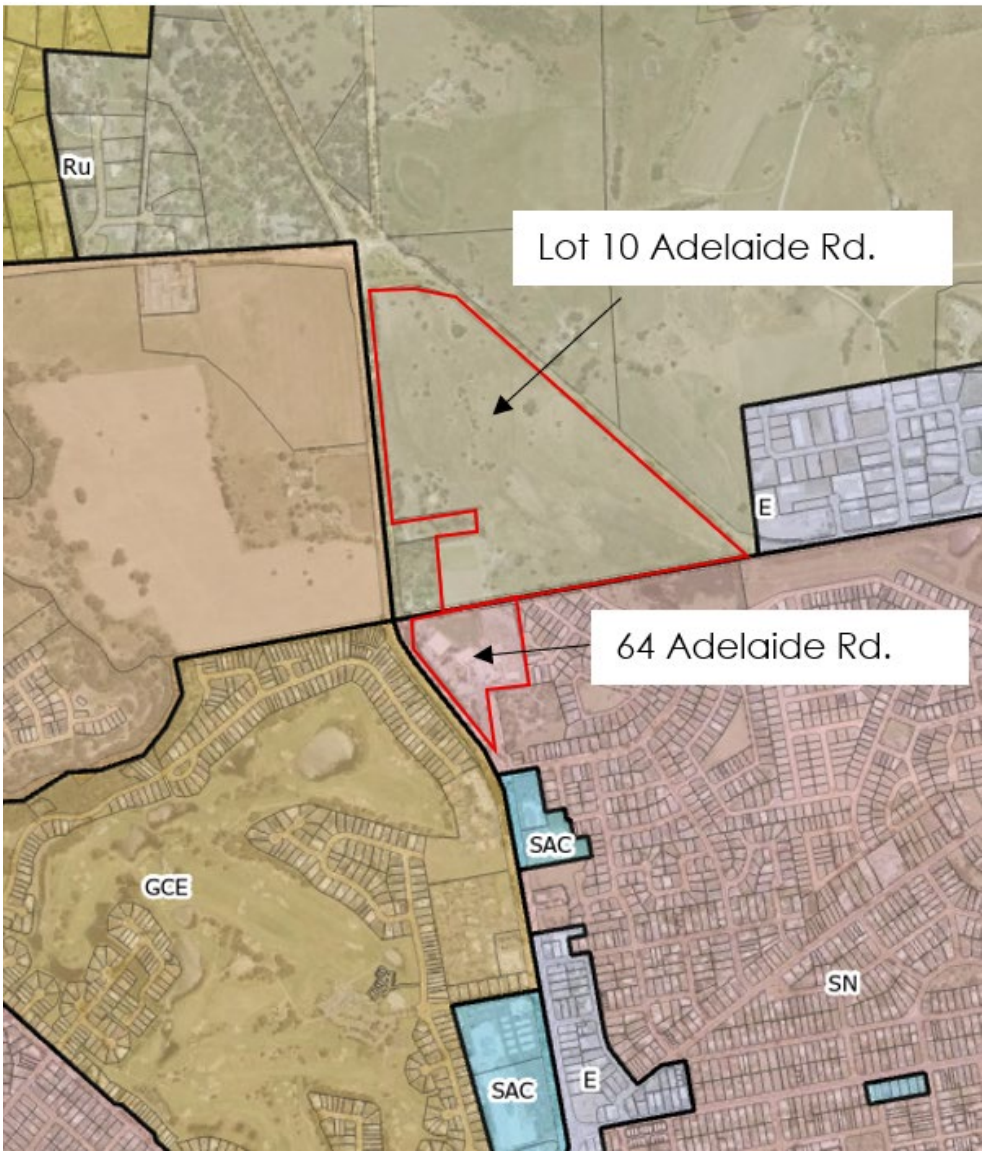


Figure 1 – College Land and Existing Zoning

2.0 The Greater Adelaide Regional Plan

The Greater Adelaide Regional Plan (GARP) provides a long-term strategic blueprint to guide urban growth and development across the Greater Adelaide region, through to 2055. Amongst other things, the GARP sets short, medium and long term targets in relation to population growth and the provision of social infrastructure (such as schools) to support this growth.

To support population projections, the GARP forecasts an estimated additional yield of approximately 6,600 dwellings within the Victor Harbor region, including *'greenfield sub-areas'* adjacent Encounter Bay, along portion of the Inman Valley Road and between Greenhills Road and Victor Harbor Roads. In addition, the GARP also forecasts the provision of an additional 3,200 dwellings near Goolwa and Middleton.

Within the GARP, our existing campus is situated within an *'Existing Township'* (being land where residential development is the predominant focus); with Lot 10 identified as a *'Future Greenfield Growth Area'*, situated within the urban growth boundary and outside of the Environment and Food Protection Area (EFPA).

Figure 2 illustrates the location of land under the ownership and control of the College, relative to planned urban growth areas.

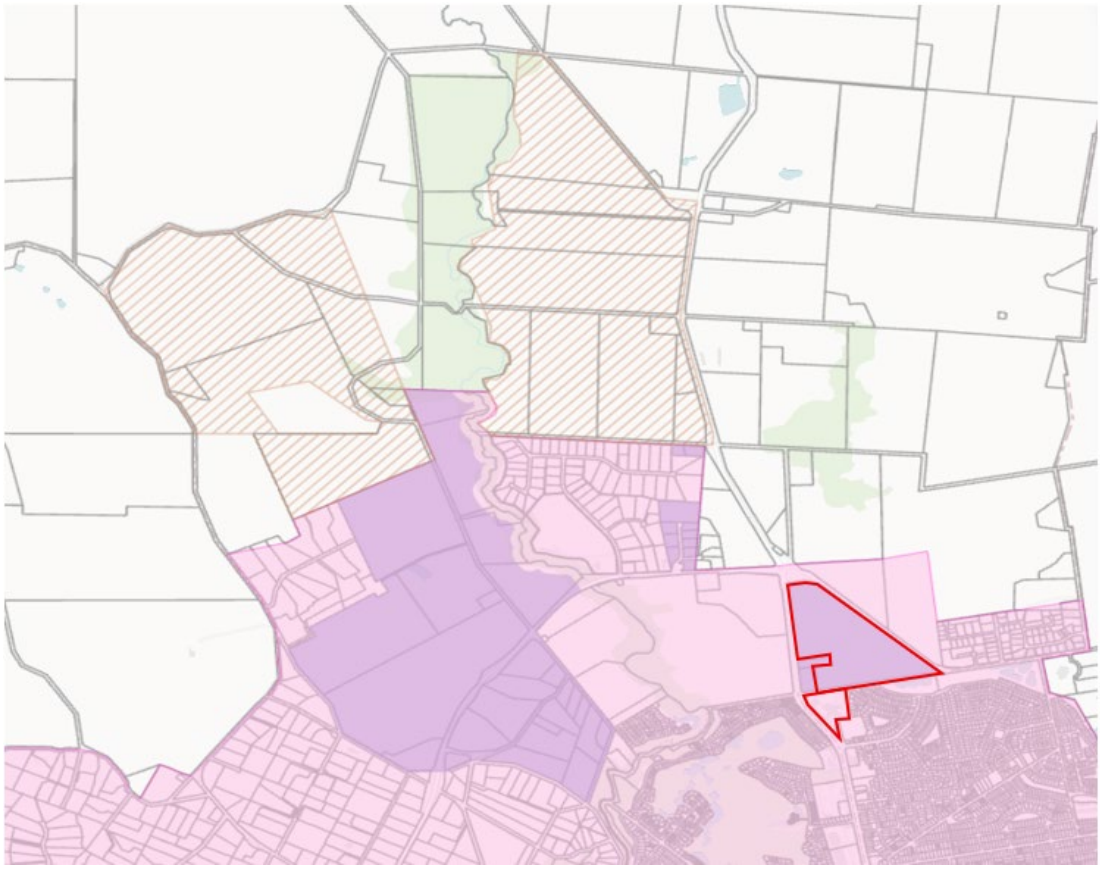


Figure 2 – College Land relative to Greenfield Growth Areas (Source: GARP)

We understand that the GARP does not provide a succinct definition of the term 'Future Greenfield Growth Area'. However, further to our discussion with Grant Croft (Acting Manager, Greater Adelaide Regional Plan, Department for Housing and Urban Development) we understand the term refers to undeveloped or largely undeveloped land identified on the urban fringe or in township settings that are strategically suitable for future urban development, which could include a range of supporting activities including activity centres, schools, open space and other important functions.

This is further emphasised within the GARP itself which notes the importance of social infrastructure (including schools) to support growing communities. In particular, Social Infrastructure Strategic Objective 4 seeks to "*facilitate the expansion of existing education facilities and the establishment of new education hubs to support lifelong learning in established areas and new growth areas, to accommodate future demand.*"

3.0 The Victor Harbor Urban Growth Management Strategy

In October 2024, Victor Harbor Council released the first draft Urban Growth Management Strategy (UGMS) for community feedback. The 2024 UGMS identified our existing campus grounds (64 Adelaide Road) together with a significant portion of Lot 10 for future rezoning to the Community Facilities Zone. The northern portion of Lot 10 was identified for future commercial development and specifically, the establishment of a 'Secondary Centre' to support the established and growing community.

The spatial application of the Community Facilities Zone and future commercial land (Secondary Centre) was informed by the Council's Community Plan, and the following Strategic Principles:

- **Principle 2** – Our economy is productive, prosperous and attracts investment.
- **Principle 3** – Services and Infrastructure meeting demand and are reliable and efficient.

In support of Principle 2, the 2024 UGMS noted the importance of allocating sufficient land "*to allow for the expansion of existing businesses and the establishment of new businesses across numerous sectors*". Similarly, Principle 3 aimed to ensure that adequate services are available to support population growth.

The following 'Actions' from the 2024 UGMS were directly or indirectly applicable to the College:

3.1.2 Protect existing community facilities and facilitate their expansion by rezoning land to support these uses shown on Map 5.

3.1.5 Advocate for the additional provision of primary and secondary schools, hospitals, an urgent care clinic or similar, aged care and emergency services (ongoing priority)

While the College was broadly supportive of the strategic directions outlined in the 2024 UGMS (as confirmed in our written submission), we do not support the revised 2025 version of the UGMS, which now:

1. Proposes to remove the spatial application of land for Community Facility uses or the 'Community Facilities Zone' from all land owned by the College; and
2. No longer proposes commercial uses across the northern portion of Lot 10 Adelaide Road.

Figure 3 provides a visual comparison of the significant shift in strategic direction between the original and revised 2050 Structure Plans contained within the UGMS:

2024 UGMS Structure Plan

2025 UGMS Structure Plan

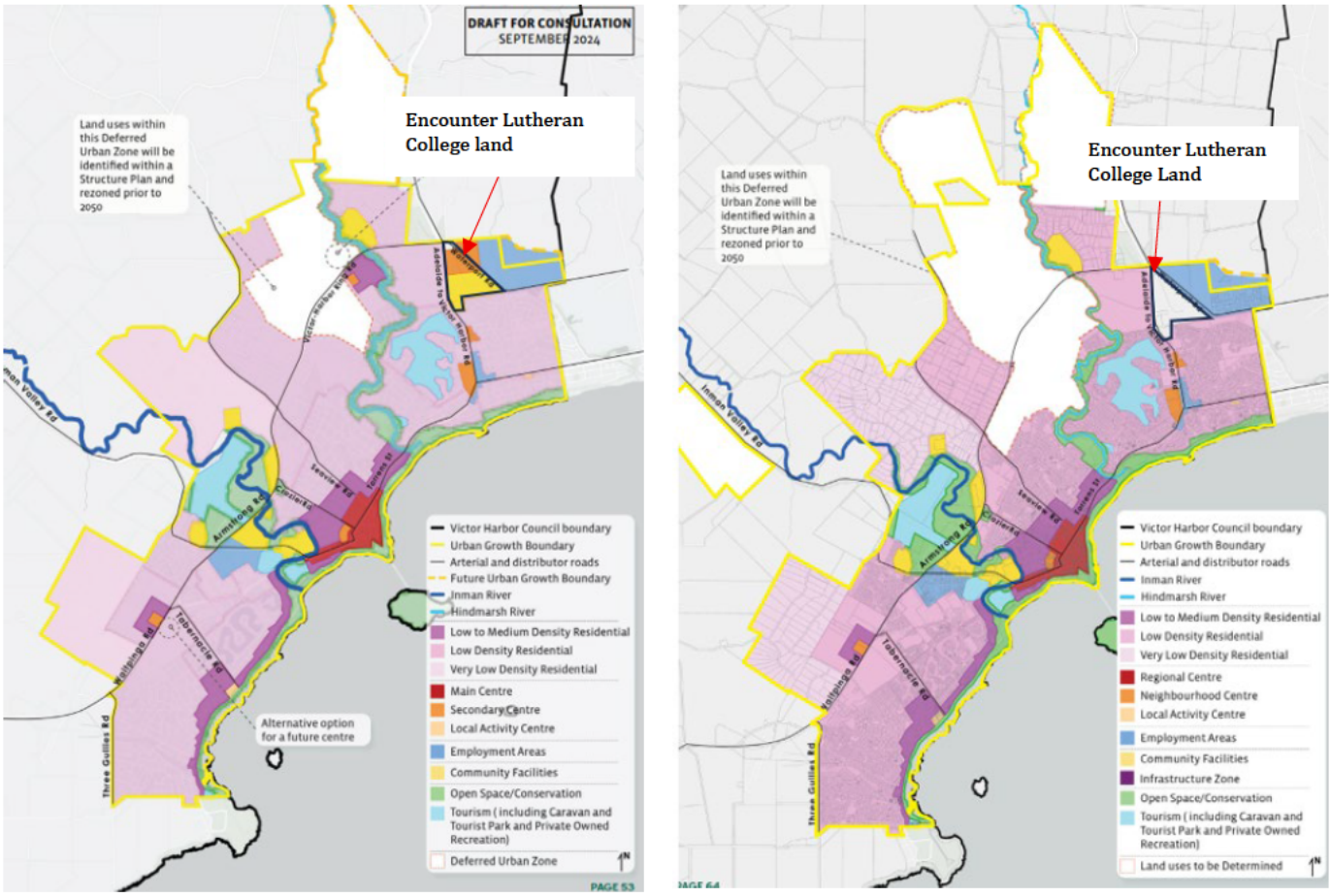


Figure 3 – 2024 & 2025 UGMS Structure Plan Comparison

As illustrated, the revised Structure Plan doesn't provide any strategic direction for land owned by the College, either in relation to future expansion of the College (educational establishment), or for any other purpose.

In our view, the revised UGMS and the outcomes of the community consultation process offer very little justification for this significant shift in strategic direction. For example, the Engagement Summary indicates that only two (2) landowners within areas earmarked for rezoning to the Community Facilities Zone opposed the change. Encounter Lutheran College represents the families of over 830 students, and given anticipated population growth of future families moving to the region who will require access to quality educational facilities. In our opinion, the voice of the College should be carefully considered and given significant weight, given the vital role we play in delivering essential educational services to a growing community.

The Engagement Summary identified twelve (12) people in support of the commercial use of the northern end of Lot 10, and ten (10) people in opposition. In addition, opposition was noted from community members attending Community Open Days, with concerns raised about parking and traffic sightlines along Waterport Road. Despite these mixed views, the limited response rate suggests that the feedback may not be representative of the broader community. Further, concerns related to traffic and parking are design considerations and should not be used to guide strategic decisions regarding future land rezoning and the long-term needs of the wider community.

4.0 Recommended Amendments to the UGMS

Encounter Lutheran College does not support the revised (2025) version of the UGMS, which completely excludes all land under the ownership and control of the College.

Instead, we respectfully request the Council considers further revisions to the UGMS to:

1. Support the ongoing use of 64 Adelaide Road as an educational facility;
2. Enable the logical and orderly expansion of our existing educational facility by designating the majority of Lot 10 for community facility-type uses or the Community Facilities Zone (which could include but is not limited to educational uses); and
3. Designate the northern end of Lot 10 for commercial purposes, such as a 'Local Activity Centre' or similar development.

These recommendations are broadly consistent with those presented in the 2024 UGMS, albeit with a smaller portion of Lot 10 allocated to future commercial uses. Our proposed land use arrangement is illustrated in ***Figure 4*** below.

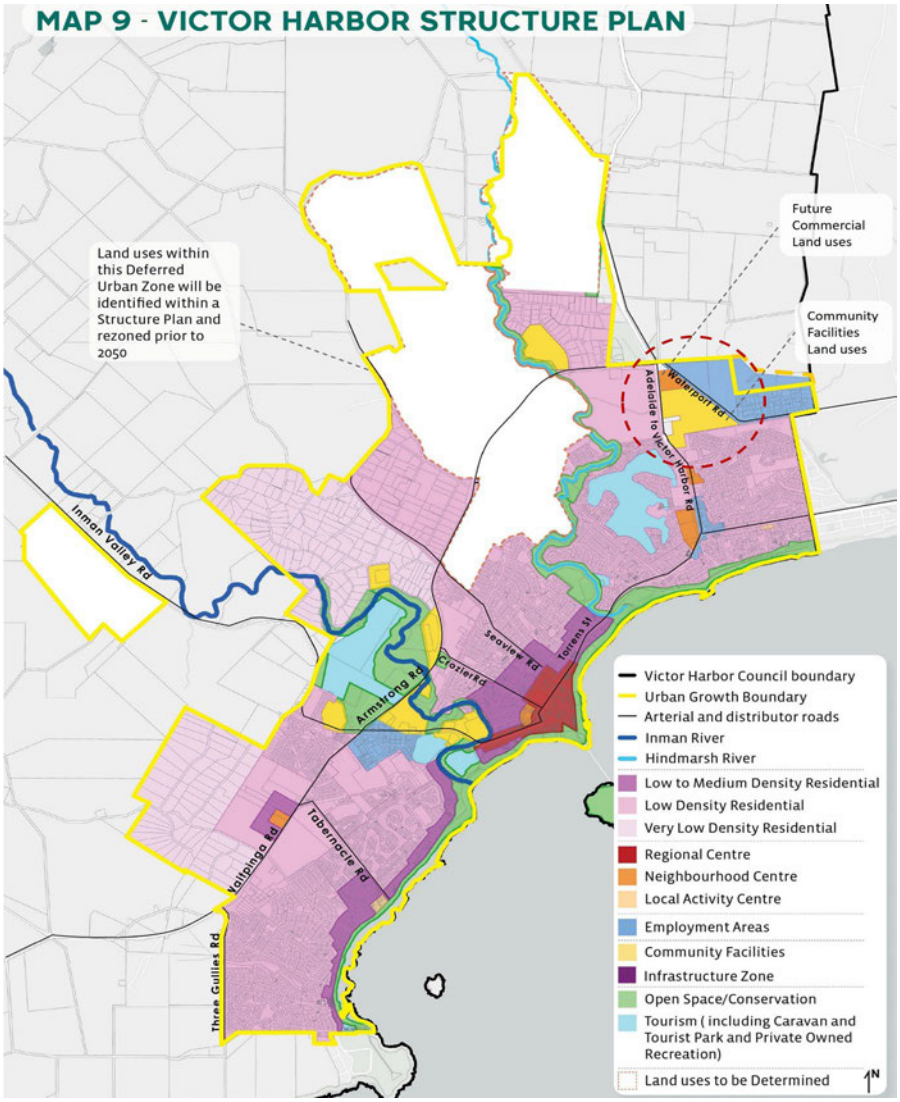


Figure 4 – Suggested changes to UGMS Structure Plan

Our reasons for recommending the above changes to the UGMS are outlined and addressed below.

4.1 Strategic Alignment with GARP

While the UGMS claims to be informed by the strategic directions of the Greater Adelaide Regional Plan (GARP), the revised 2025 Strategy doesn't acknowledge any of the land owned and controlled by Encounter Lutheran College, including our strategically located holding at Lot 10 Adelaide Road, Hindmarsh Valley. This omission is particularly concerning given that Lot 10 was purposefully acquired to support the future expansion of our existing campus and is ideally positioned to meet the educational infrastructure needs of a growing regional population.

This omission represents not only a missed opportunity but also a clear inconsistency with the strategic directions outlined in the GARP. The GARP explicitly identifies Lot 10 as a *Future Greenfield Growth Area* and separately emphasises the critical importance of delivering social infrastructure to support projected population growth within the Fleurieu Region.

The revised UGMS itself cites high population growth projections from the GARP, suggesting that Victor Harbor's population could increase by more than 19,000 people. It also acknowledges the need for Council to plan for housing, employment, services, and infrastructure to accommodate this growth.

The Social Infrastructure Objectives within the GARP also call for the identification and preservation of suitable land for social infrastructure, including its expansion. Similarly, Action 3.1D of the updated UGMS states that Council should act as an "*advocate for the additional provision of primary and secondary schools, tertiary education… to support the growing population and to attract and retain young people.*"

By removing College owned land from the UGMS, the revised strategy contradicts this stated action and risks undermining our ability to expand and meet future educational demand. This decision not only disregards the strategic intent of the GARP but also doesn't recognize the essential role Encounter Lutheran College plays in delivering educational services to a growing community.

The UGMS identifies approximately 24.6 hectares of land east of Lot 10 (on the opposite side of Waterport Road) for rezoning to support employment uses. Designating the northern portion of Lot 10 for commercial purposes (such as a Local Activity Centre) is directly aligned with GARP's strategic objectives for Greenfield and township development. Notably, Objective 4 of the GARP seeks the following outcome:

> *"Incorporate employment land and activity centres in new growth areas where required to ensure new communities have convenient access to everyday goods and services and local employment opportunities."*

Conversely, failing to allocate sufficient land for commercial uses to support employment and residential growth will place additional pressure on the existing town centre.

For these reasons, the recommended changes shown in ***Figure 4*** are directly aligned with the strategic intent of the GARP. Specifically:

1. Applying the Community Facilities Zone to our existing campus reflects its long-standing use as an educational facility;
2. Designating the majority of Lot 10 for community facility uses supports the logical and orderly expansion of the campus in line with population growth and the GARP's Future Greenfield Development designation;
3. Lot 10 is located outside the Environment and Food Production Area (EFPA), making it highly suitable for rezoning and urban development; and

4. Establishing a small Activity Centre at the northern end of Lot 10 complements the proposed employment zoning of adjacent land and supports the creation of a well-serviced and well-connected community.

4.2 Supports Gateway Development

With respect to Lot 10, the revised UGMS seeks to maintain the status quo in relation to land use outcomes and zoning. The existing Rural Zoning which applies to this land primarily seeks to support primary production activities together with associated value adding, processing, warehousing and distribution.

At the same time, the UGMS proposes to apply the 'Gateway Overlay' to the entire frontage of Lot 10 along both Waterport Road and Adelaide Road (refer to ***Figure 5***). This overlay appears to acknowledge the allotment's strategic significance as a landmark site at the gateway to Victor Harbor. However, the form and type of development contemplated by the 'Rural Zone' is not conducive to achieving the high-quality design outcomes and built form presence envisioned by the Gateway Overlay. In contrast, allocating land fronting Waterport Road and Adelaide Road for community facilities and small-scale commercial land uses (such as smaller scale retail offerings) adjacent the Waterport Road / Adelaide Road junction would better align with Council's aspirations for this important entry 'gateway' into the city.

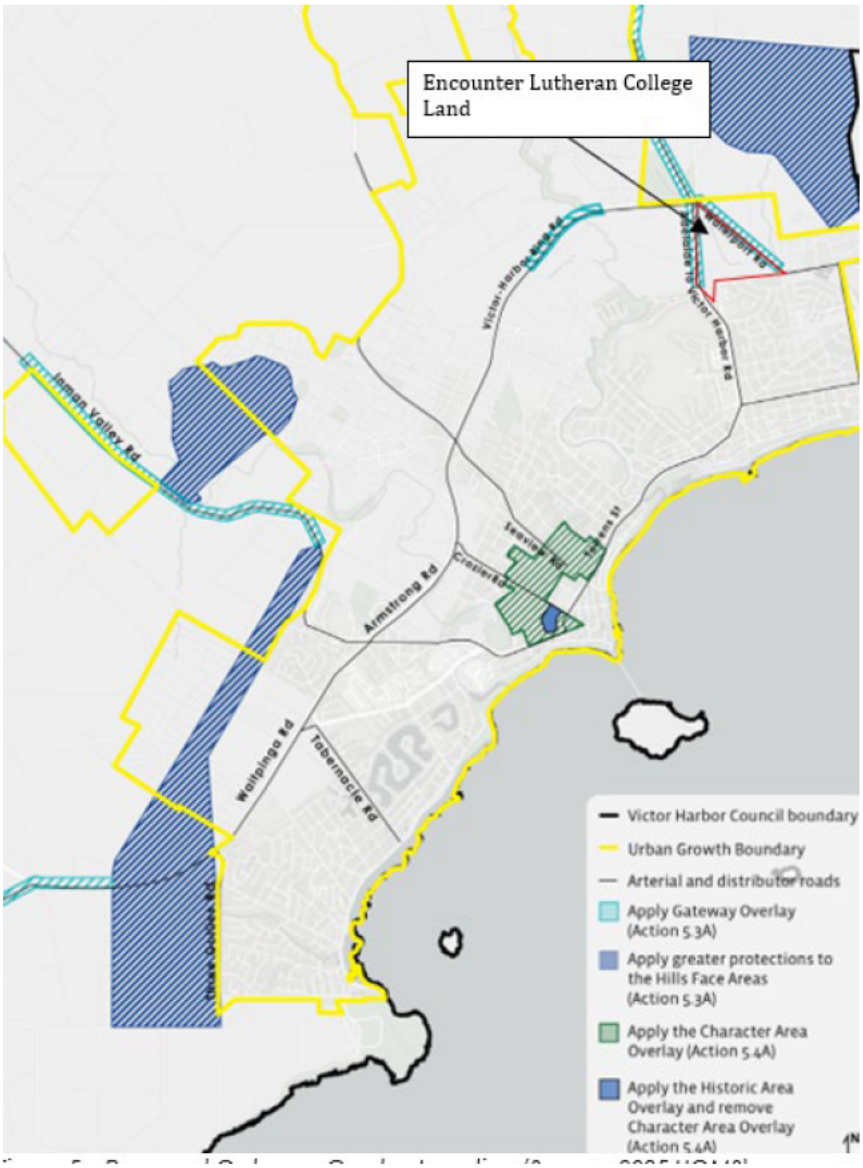


Figure 5 – Proposed Gateway Overlay Location (Source: 2025 UGMS)

4.3 Management of Interface Impacts

The UGMS 2025 proposes to rezone land immediately east of Lot 10 to facilitate the development of employment-generating uses. We understand that a future rezoning of this land would therefore likely involve the application of either the 'Employment Zone' or the 'Strategic Employment Zone'.

Both zones allow for a variety of commercial activities, including forms of industry that may generate emissions or other impacts that could negatively affect local amenity.

In addition to supporting the provision of essential social infrastructure, designating Lot 10 for community facility uses would enable future development that assists to manage interface impacts. For example, this could be achieved by locating less sensitive uses (such as sporting ovals and recreational facilities) along Waterport Road, thereby creating a buffer between more intensive employment uses to the east and more sensitive community uses to the west.

5.0 Summary & Request

Encounter Lutheran College does not support the revised 2025 Urban Growth Management Strategy (UGMS), which entirely omits recognition of land owned and controlled by the College. The Strategy doesn't adequately fulfil its stated objective to "*advocate for the additional provision of primary and secondary schools, tertiary education,*" and overlooks the pressing need for essential social infrastructure. With significant population growth projected for the region, the absence of planning for future educational facilities represents a critical gap in the UGMS's strategic framework and undermines its commitment to responsible and community-focused development.

The City of Victor Harbor's vision is to be "*a place of choice to live, invest and visit*", and education is a critical component of the infrastructure required to realise this vision.

The future sustainability and capacity of Encounter Lutheran College to thrive will directly support the objectives of the City of Victor Harbor, including those outlined in the UGMS. We view the College as a committed community partner, aligned with the Council's goals, albeit through a different lens. It is therefore disappointing that the revised UGMS doesn't acknowledge or incorporate land owned by the College, despite its clear relevance to the region's future infrastructure and service delivery needs.

While Encounter Lutheran College may be viewed as a single stakeholder, in reality we represent 830 students and their families, serving the interests of over 2,000 South Coast residents, the majority of whom reside within the City of Victor Harbor. We respectfully request that this submission be considered in that context, recognising the College's significant role in supporting the region's educational and social infrastructure.

In closing, we request that the UGMS is amended and updated to incorporate the following changes:

1. Apply the 'Community Facilities Zone' to our existing campus to reflect its long-standing use as an educational facility and ensure alignment with its current and future role in the region;
2. Designate the majority of Lot 10 Adelaide Road for community facility uses to support the logical and orderly expansion of the College in response to projected population growth, consistent with the Greater Adelaide Regional Plan's 'Future Growth Area' designation; and

3. Allocate the northern portion of Lot 10 for future commercial uses to complement planned employment expansion to the east and accommodate anticipated population growth, enhancing the strategic value of this highly connected and strategic landmark site.

We thank you in anticipation of your favorable consideration of this submission. Please don't hesitate to contact me should you require any further information or clarification.

Sincerely

[redacted]

[redacted]

9 July 2025

To Whom It May Concern:

Please find following the written submission for [redacted] and [redacted]n in reply to the current draft of the Victor Harbor Urban Growth Management Strategy 2050.

1) Employment Land

- We remain supportive for the expansion of future employment land into our property, as identified in both the UGMS and the GARP.

- It would be good if Map 9 in the UGMS could be adjusted to reflect more accurately the new 'urban growth boundary' with one line removed and the 'dashed' line made solid (as identified in Diagram 1 below). I suspect this has been done for the area remaining in the EFPA, however it is my understanding that Employment Land, unlike Residential Land, can be developed within the EFPA, and Employment Land's removal from the EFPA is not required for a code amendment or development approval to take place. In the event a request was lodged for EFPA removal, for the relevant Employment Land area, I suspect the case would be stronger if this area was identified solidly within in the Urban Growth Boundary.

DIAGRAM 1: Map 9 Adjustment

2) Hills Face Protection

- We have no major objection to the Hills Face Protection on our property.

- We feel it important however that a topographic line is agreed to on our land before any plans are developed or protection is implemented. The existing line, as it applies to our land, appears to be reasonably generic.

- While not our land, we also believe the 'building envelope' on lot 5 and the title of Lot 2 (please refer to Diagram 2 below) should be omitted from future Hills Face Protection. I suspect developments will take place on this land prior to any implementation of this policy, but in the event this was not the case, it would seem fair and reasonable to provide some protection to these landowners, who purchased this land under existing conditions.

DIAGRAM 2: Lot 1 and Lot 5

3) Gateway Overlay along Waterport Road

- We have no major objection to the Gateway Overlay along Waterport Road and are supportive of the Gateway Overlays in general.

- In relation to the Gateway Overlay along Waterport Road it will be important that a commercial balance is struck between any future employment land area and any required/recommended green belts and planting requirements.

If you have any questions regarding our feedback please do not hesitate to get in touch.

All the best,

[redacted]

Submission re Draft Urban Growth Management Strategy: The need for setback buffer zones

Urban growth should be guided by thoughtful, forward-thinking planning, yet the development of Sea Scape along Waitpinga Road is a glaring example of development outpacing planning. Two houses have already sprung up within mere metres of this main arterial and distributor road—one of the busiest routes linking Victor Harbor and Cape Jervis. Freight vehicles, caravans, and cars stream past daily, yet there is **no appropriate buffer zone** to set back homes from this traffic corridor.

The VH Council's Draft Urban Growth Management Strategy Map 6 designates Waitpinga Road as a Regional Freight Route. This is a significant thoroughfare, yet planning documents show no evidence that space has been preserved, through designated setbacks, to protect residents from a major arterial route. The absence of a set-back (or buffer zone) along Waitpinga Road suggests that currently **development is outpacing proper planning**. It's essential that The Urban Growth Management Strategy develops set-back buffer zone policies, and prevents development from becoming an irreversible mistake. Once houses are built, there is **no room to correct this oversight as is evident in Sea Scape, along Waitpinga Road, where allowance has not been made for an appropriate set-back.**

Set-back buffer zones are not mere technicalities; they are essential safeguards. They provide environmental enhancement, noise mitigation, and—most importantly—safety for residents.

Specifically, the VH Council's Draft Urban Growth Management Strategy, needs to respond to the following actions or comments:

- In principle 3, action 3.7A (which refers to the Freight Route and seeks to ensure that the speed limit is retained), there is no reference to the needs of residents who live close to the Freight Route.

- Principle 3, needs to add a new action 3.7B stating that, as a high priority, set-back buffer zones be designated for major roads. Set-backs on major roads provide buffer zones that create a physical distance between roads and housing. This is a safety feature providing a physical barrier in case of accidents. Set-backs also create space for green buffer zones that offer environmental benefits, such as supporting biodiversity and reducing heat-island effects, as well as enhancing the visual appeal of a community. Further, set-backs enable space for future road widening.

- In principle 4, action 4.3B, needs to include road set-back buffer zones as potential offset land that may generate significant environmental benefit credits re the Native Vegetation Credit Register.

- In principle 5, action 5.3A, needs to add an additional dot point: to apply the Gateway Overlay to Waitpinga Road, as it is a very scenic entry to Victor Harbor.

Set-back buffer zones along the road sides will enhance this scenic entry to Victor Harbor.

- Principle 5, action 5.3A, needs to also include the application of set-back buffer zones as an essential part of the Gateway Overlay to all roads leading into Victor Harbor, including Waitpinga Road which carries tourists entering Victor Harbor from Kangaroo Island and is a road of high scenic value.

  The notes to this action state principles for areas of high-scenic value. These principles should also refer to the need to create planning controls relating to fencing along major roads; specifically, there should be controls against colourbond fences that create 'colourbond tunnels' not in keeping with the Gateway Overlay.

Victor Harbor's Urban Growth Management Strategy has a unique opportunity to enhance Victor Harbor to be a place of choice for people of all ages to live, raise families, work and retire as well as retaining the accolade as the most popular tourist town in South Australia.



Native Vegetation Council

81-95 Waymouth Street
Adelaide SA 5000

GPO Box 1047
Adelaide SA 5001

Ph| 08 8303 9777

nvc@sa.gov.au

Contact: [redacted]
Telephone: 08 8303 9777

2 July 2025

City of Victor Harbor
PO Box 11
Victor Harbor SA 5211
Email: localgov@victor.sa.gov.au

Dear UGMS Project Team,

Thank you for the opportunity to review the revised draft City of Victor Harbor Urban Growth Management Strategy.

The Native Vegetation Council (Council) is an independent statutory body established under the *Native Vegetation Act 1991* (NV Act). Its functions include keeping the condition of native vegetation in the State under review and advising in relation to the preservation, enhancement and management of existing native vegetation. Further functions involve encouraging the re-establishment of native vegetation and research, considering applications to clear native vegetation, determining offsets, and enforcing compliance with the NV Act.

The Council supports all changes actioned by the UGM Project Team in response to previous feedback, highlighting the following objectives:

- Objective 4.1A: Establish key wildlife corridors to improve linkages between green spaces, particularly an east to west corridor that can link the Hindmarsh and Inman Rivers,
- Objective 4.1B: Review environmental protections within the Planning and Design Code and Council's bylaws to ensure that they assist the delivery of the Environmental Management Plan and the Biodiversity and Natural Assets Management Plan
- Objective 4.1C: Set a tree canopy and green space target for the Victor Harbor urban area (defined by the urban growth boundary)
- Objective 4.1E: Identify opportunities for Native Vegetation Agreements to protect biodiversity on Council Land
- Objective 4.3B: Investigate areas for potential off-set/land that may generate significant environment benefit credits and nominate them on the Native Vegetations Credit Register

In particular, the Council welcomes the inclusion of Objective 4.1E. It is a brilliant addition that enhances the City of Victor Harbor's strategy for protecting and enhancing the environment. The Council encourages the City of Victor Harbor to contact the Department for Environment and Water's Native Vegetation Branch if assistance is required to identify appropriate land for protection.

The Council notes the omission of previous feedback, including:

- The City of Victor Harbor is encouraged to apply the Mitigation Hierarchy (avoid, minimise, rehabilitate/restore, offset) to reduce threats to biodiversity, particularly in relation to current or proposed future growth areas.
- The inclusion of a 'nature positive' target for Victor Harbor. This would mean that the quantity and quality of native vegetation across the City of Victor Harbor should be back to 2020 levels by 2030, and 'fully recovered' by 2050.
- It is unclear from the current draft which actions are directly related to Objective 4.2.

The Council provides the following additional comments:

- The removal of native vegetation poses a greater threat to regional biodiversity than the removal on introduced species. As such, the protection of native vegetation must be prioritised. The Council's previous submission recommended using 'native vegetation' rather than 'vegetation' whenever appropriate. This was, in part, a request designed to prioritise native vegetation when considering biodiversity outcomes. It is encouraging to see that this suggested change has been actioned in some places. Yet there are some places where 'vegetation' remains. The Council recommends using 'native vegetation' rather than 'vegetation' when detailing "clearance" (see objective 4.2), intentions to "protect" (see objective 4.7B) or 'Unit Biodiversity Scores (see page 73).

- A correction is required to the Strategy's current definition of "Unit Biodiversity Score" as it implies that the Department of Environment and Water "evaluates the benefit of retaining or clearing an area of vegetation". It is in fact, the Council that considers the unit biodiversity score when determining whether to approve a request for native vegetation clearance. The Council strongly encourages updating the definition of "Unit Biodiversity Score" to ensure greater accuracy.

- As previously noted, Objective 4.1E identifies the City of Victor Harbor's intent to identify opportunities for Native Vegetation Agreements to protect biodiversity. For accuracy, the Council recommends using 'Native Vegetation Heritage Agreements' rather than 'Native Vegetation Agreements'.

The Council encourages the City of Victor Harbor to continue working with the Department for Environment and Water's Native Vegetation Branch. This partnership generates opportunities for the joint review of all land within current council boundaries, flagging areas for potential protection through Native Vegetation Heritage Agreements. Continued partnership also provides opportunities to identify native species for inclusion on the City of Victor Harbor's *Street Tree Species List*.

Thank you again for the opportunity to provide comments on revised draft Strategy. If you have any questions about this submission, please contact Ms Jannah Wilson, Policy Officer, on telephone number (08) 8303 9777 or email nvc@sa.gov.au.

Yours sincerely

[redacted]

[redacted]

[redacted]

NATIVE VEGETATION COUNCIL

From: [redacted]
To: David Read; City of Victor Harbor
Subject: IREC40235225 - SM18.20.030 - Re: Victor Harbor Urban Growth Management Strategy 2050 (UGMS) - Consultation (extended to 21 July 2025)
Date: Tuesday, 22 July 2025 10:47:28 AM
Attachments: covh_logo_rgb_4817ac2f-a8c9-4bb1-9d7a-1ed0de5e99aa.png
vv2025_7f0a9b8b-84e1-46ed-a17e-664ccb130bc2.png

Hi David, please excuse my lateness in reply. It is an extensive draft to read and summarise. Hopefully my submission can be taken onboard. The feedback below isn't new or groundbreaking; it is mainly how I see the potential for Victor Harbor to evolve into a well-connected regional city. I have emphasised the key areas of the draft I like to see prioritised.

Regards[redacted].

UGMS Feedback Submission

Respondent: [redacted]
Areas of Interest: Urban Design & Planning, Active Transport, Climate-Responsive Infrastructure, Community Engagement

Summary of Feedback

The Draft UGMS 17.0 presents a strong framework for guiding Victor Harbor's growth to 2050. It reflects genuine community consultation and integrates key themes of sustainability, staged growth, and resilience. The strategy outlines a vision that is well aligned with the region's values.

Several areas would benefit from further emphasis and early prioritisation—particularly around reducing urban sprawl, focusing investment in existing urban centres, enhancing green transport networks, and embedding climate adaptation strategies into infrastructure planning.

Considerations & Key Feedback

1. Urban Containment & Renewal

Support: Continued commitment to precinct staging and limiting outward expansion is essential.

Feedback:

- The UGMS should elevate urban consolidation by prioritising infill development and the revitalisation of existing commercial and residential nodes.
- Incentives for mixed-use and medium-density housing in core urban areas (e.g., near Ocean St, Maude St, Victoria St and other Primary Roads, community precincts, and existing bus routes) could reduce dependency on fringe expansion.
- Avoiding greenfield sprawl reduces infrastructure costs, traffic load, and emissions—particularly in a climate-constrained future.
- Enhance existing council and private building asset renewal programs. Incentivise potential tenants to active spaces and buildings to create longer term business outcomes and revitalise existing commercial precincts. (Eg. Renew Adelaide concept.)

2. Connected Communities & Green Transportation

Support: Stronger attention to walking and cycling infrastructure in precinct planning.

Feedback:

- Active transport corridors should be treated as core infrastructure, not amenities. Prioritise early delivery of separated cycling and walking routes in each precinct's infrastructure sequencing.

- Integrate safe routes to schools in staging plans, especially with youth populations forecasted in Precinct A and future developments.
- Develop a cohesive cycling network that connects key community nodes: schools, shops, healthcare, transport stops, and recreational trails.
- Consider implementing a Victor Harbor Bike Bus Network, drawing from successful pilot efforts at Port Elliot Primary School and presented at the Youth Climate Summit.

3. Green Corridors & Ecological Infrastructure

Support: The UGMS's focus on protecting biodiversity, waterways, and integrating water-sensitive design.

Feedback:

- Enhance the concept of linear green corridors that serve dual functions: biodiversity protection and active transport routes.
- Include ecological trail networks in the staging maps, with native vegetation buffers and stormwater filtration infrastructure.
- Engage local groups in the co-design and maintenance of green transport and recreation spaces.

4. Adaptation to Climate Risk

Support: Recognition of coastal vulnerability and importance of resilient infrastructure.

Feedback:

- Prioritise climate adaptation strategies such as shading, tree canopy expansion, permeable surfaces, and stormwater reuse in all precinct designs.
- Embed climate risk analysis into land release schedules—precincts more exposed to flood, bushfire, or erosion risk should be deprioritised or redesigned.
- Include cool corridors (shaded pedestrian and cycle paths) within growth areas to mitigate heat and enhance wellbeing.

5. Youth Infrastructure & Community Hubs

Support: Scheduling of new community facilities in growth areas.

Feedback:

- Plan for multi-functional youth spaces early in precinct development: e.g., bike hubs, outdoor venues and sporting spaces, repair workshops and professional development & community sustainable and activity events.
- Leverage existing programs to activate new infrastructure through youth-led maintenance and community engagement initiatives.

Summary Recommendations

1. **Reinforce growth within existing urban boundaries**, not just through sequencing but by actively enabling renewal.
2. **Invest early in green transport networks** that connect homes to services—bikes, walking, and transit should guide growth, not follow it.
3. **Use green corridors as structural elements**, not just buffers—integrate them into ecological and recreational planning.
4. **Ensure climate change adaptation is embedded**, with metrics tied to resilience, not just

growth.

5. **Enable local pilot projects**—youth programs, trail hubs, and community bike buses—to serve as models for scalable, place-based success.

On Wed, 9 Jul 2025 at 09:43, David Read <dread@victor.sa.gov.au> wrote:

> Hi [redacted],
>
> You may be interested in this project, as it considers the future growth of Victor Harbor to 2050.
>
> In October 2024, the draft City of Victor Harbor Urban Growth Management Strategy was released for community feedback. Following this feedback, Council has made multiple improvements to the Strategy to ensure that our city remains a place of choice to live, work, invest and visit for our current and future community.
>
> Before we finalise the Strategy, we would like to hear your feedback on these improvements. An updated draft Urban Growth Management Strategy has been released for a final round of community consultation.
>
> A summary of what we heard from the community during the last round of consultation and the key changes made to the updated Strategy are provided on Council's Your Say Victor Harbor website or can be viewed in hard copy at the Civic Centre (1 Bay Road, Victor Harbor).
>
> You can have your say by:
>
> - **Completing a survey** before 5pm on Monday, 21 July 2025 either via:
>   - Online at www.yoursay.victor.sa.gov.au/ugms
>   - Hard copies available from the Civic Centre at 1 Bay Road, Victor Harbor
> - **Making a written submission** and return it before 5pm on Monday, 21 July 2025 either via:
>   - the online submission form
>   - email to localgov@victor.sa.gov.au
>   - post to City of Victor Harbor (UGMS Consultation), PO Box 11, Victor Harbor SA 5211
>
> **More information?**
>
> A copy of the draft Urban Growth Management Strategy and supporting documents are available online or a hard copy can be collected from the City of Victor Harbor Civic Centre (1 Bay Road, Victor Harbor).
>
> **David Read** | Strategic & Policy Planner
>
> **City of Victor Harbor**
> 1 Bay Road, Victor Harbor SA 5211
> **P** 85510536 | **M** 0421053116
> **E** dread@victor.sa.gov.au | www.victor.sa.gov.au

VV 2025.png

The City of Victor Harbor acknowledges the Ramindjeri and Ngarrindjeri people, the Traditional Custodians of the land and surrounding waters where we live and work. We acknowledge their deep connection to Country and pay our respects to Elders past, present and emerging. This respect is extended to Aboriginal and Torres Strait Islander people across Australia.

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City of Victor Harbor (UGMS Consultation)
PO Box 11, Victor Harbor SA 5211 [Recipient Position/Title]

Via Email: localgov@victor.sa.gov.au

21 July 2025

To whom-so-ever-it-may-concern,

Re: City of Victor Harbor UGMS

Thank you for the opportunity to provide feedback on the draft City of Victor Harbor (CVH) Urban Growth Management Strategy (UGMS). Regional Development Australia Adelaide Hills, Fleurieu and Kangaroo Island (RDA AHFKI) mission is to lead, facilitate and collaborate to realise the region's economic potential. For this reason, we are particularly interested in providing feedback on the housing, economy, services and infrastructure components of the UGMS.

Before providing feedback on those specific areas, we offer a general note on population. Although the UGMS discusses state (GARP) and council population projections, there is no apparent acknowledgement or consideration of the total catchment population which is attracted to the CVH by its increasingly important role as the Fleurieu's retail and services centre. That catchment might extend from Normanville in the west, to Mount Compass in the north and Finnis to the east. That area includes the significant Goolwa growth area identified in the GARP.

Housing

There are some missed aspects and opportunities in this strategy including:

- There is an opportunity to collaborate with the South Australian government's Regional Key Worker Housing Scheme. This scheme builds new fit-for-purpose housing in key areas to attract and retain essential workers like teachers, health-care workers and police. In a recent meeting with the CEO of the Barossa Hills Fleurieu Local Health network, a lack of accommodation options for staff was identified as one of the organisations top issues. RDA AHFKI is a willing supporter and advocate to assist this scheme come to CVH.

- Housing diversity for stage of life is a strong point made in the strategy, with a focus on working-age population. However, there is a lack of consideration given to the important affordable housing and non-commercial housing (public and community).

- In December 2022 4.2% of the CVH housing was listed on Stayz and AirBnB (ref; AirDNA). The growing popularity of short-stay accommodation has removed some of the long-term rental stock, placing upward pressure on house prices and decreasing the availability of housing for workers. Based on the importance of these impacts and the potential for local government to play a role in the availability of short-stay accommodation, it would seem reasonable for this issue to be addressed in the UGMS.

Economy

- The economy of CVH and the AHFKI region more broadly, is led by and highly reliant on population growth. For the CVH, Household Consumption of $883m makes up 56% of GRP Expenditure (ABS 2021 Census). It is highly likely population growth will continue to be a significant factor on the economic performance of CVH. For that reason, it is pertinent that the UGMS consider the needs of population services industries including location (access, exposure) and scale including suitability for big-box retail and home-maker style developments.

- Retail isn't mentioned in 2.2 despite being CVH's 2nd highest employer and the sector with the highest Location Quotient (specialisation). As the Fleurieu's retail centre, it is remarkable this sector isn't being addressed.

- Further, in the discussion on the CVH Regional Centre, there is mention that the centre doesn't necessarily need more land to accommodate growth because there is scope for 'greater utilisation' of existing retail spaces. The strategy doesn't expand on that point so it is left open as to what 'greater utilisation' means, how it is measured, evaluated and how can it be influenced if at all? This appears to be a major gap in the strategy.

- To the above points, in 2.2 the Blue Water Economy is primarily a part of the Tourism sector and could be replaced with Retail.

Services and Infrastructure

- RDA AHFKI has undertaken significant work on public transport. In a survey receiving over 2,000 responses, the lack of safe, sheltered bus stops was a common reason deterring patronage of public transport. Local government has a responsibility for bus stops and there is an opportunity for CVH to take a leadership position by providing lighting and safe pavements to help raise public transport patronage.

- On the topic of public transport, there should be consideration given to the future need for a Park n Ride that will support more regular future bus services between Adelaide and CVH. Consideration should be given to planning for the location of a Park n Ride in conjunction with Department of Infrastructure and Transport.

- RDA AHFKI is an advocate for the South Coast Freight Corridor and is very supportive of the focus on it in the strategy. The same route is also important for the south cost community generally, providing a critical duplicate/alternative transport route for locals and visitors, in particular in its role to provide greater road capacity during the busier summer months.

I trust the above feedback is welcomed and I look forward to seeing the completed strategy.

Regards,

[redacted]

[redacted]
Director of Regional Development

From: [redacted]
To: City of Victor Harbor
Subject: IREC40076925 - SM18.20.030 - Urban Growth Management Strategy feedback
Date: Wednesday, 2 July 2025 3:54:32 PM

To: Urban Growth Management Project Team.

Thank you for the opportunity to attend the recent Community Open day forum and congratulations on the work done to inform rate paying residents of the strategy being proposed.

While I endorse and understand the need to put in place stategies to create opportunities for young people and families to build or buy a home in Victor Harbor, I would like to feedback two areas of concern relating to the location of this initiative.

1. The proposed part location of the Deferred Urban Zone.
2. The smaller size of allotments in the Deferred Urban Zone

My concern relates to the deferred Urban Zone on the northern side of the ring road, being Waggon Road, currently a no through road.
I do not support any development on either side of Waggon Road, (on the northern side of the Victor Harbor Ring Road) as it should remain as Rural land use.

In factoring in the need for future housing, I would like to propose that the Victor Harbor Ring Road be used as a boundary, whereby the southern side of the(seaside) be allocated for residential housing and development, whilst the north side of the Victor Harbor Ring Road remain as is, and be the lungs of Victor Harbour.

This also would be in keeping with the current nature and character of the area, together with preserving the natural habitat and environment in this zone.

In the light of the Council wishing to reduce the median age of the area, can I suggest that there be no further “55 aged plus estates” approved and newly residential sized house blocks be larger, not smaller. That would encourage families to have a back yard for children.

I would also like to add that the approved smaller allotments at Oceane, being high density smaller allotments, is also out of character for this area.
Normally higher density allotments are found close to the central city hub and move to a larger sizes when further out from the central city hub, however this does not seem to be the case.
Hence my concern is that this potential pattern of smaller allotments could eventuate along Waggon Road as a duplicate of what is already evident and would be out of character with the area, particularly if a developer sees opportunity to assign more houses or government try to pressure Council on housing quotas.

Hence I do not support (1) Council reducing the extent of rural living areas which are being investigated for smaller allotment sizes and (2) only support Council focussing on the Southern side within the deferred Urban zone for housing, specifically being the Southside of Welch Road / Armstrong Road / the Ring Route / Waggon Road.

Thank you again for the opportunity to provide feedback as I appreciate this is not

an easy task.

I hope this feedback is considered in a positive, favourable and constructive manner, as we all desire to preserve and balance the beautiful area we all live in, whilst maintaining and supporting our rural farm land.

Regards,



Our Ref: REB Draft Victor Harbor Urban Growth

18 July 2025

City of Victor Harbor
PO Box 11
Victor Harbor SA 5211

By Email Only: localgov@victor.sa.gov.au

Dear Sir/Madam

Draft Victor Harbor Urban Growth Management Strategy

Thank you for providing the opportunity to SA Power Networks to comment on the above strategy consultation.

SA Power Networks may be impacted by proposed area growth in its capacity as operator of the State's electricity distribution network or, alternatively, as a landowner/occupier. Irrespective of the tenure arrangement, all of SA Power Networks' land interests will be directly related to the operation of the electricity distribution network.

It is not practical for SA Power Networks to review every consultation to the extent necessary to comment on its individual property ownerships/occupations or infrastructure impacts. Accordingly, this response has been prepared in most part to draw attention in a general way to the matters which SA Power Networks believes should be taken into consideration in progressing the proposal.

SA Power Networks notes our Victor Harbor Substation at 4 Day Road, Victor Harbor is located within a proposed future "Priority Growth Area". Consideration should be given to the fact that any development of land in close proximity to SA Power Networks infrastructure could be impacted by:

- security required to protect against unauthorised access. This will often necessitate fencing which does not accord either in height or nature with that in the general locality.
- noise and dust.
- the movement of vehicles (including heavy vehicles) at various times throughout the day and night (including weekends).
- building setbacks, building near power lines and vegetation clearances that are prescribed by the Electricity Act 1996.

SA Power Networks takes its obligations to meet future electricity demand very seriously. You will appreciate that *any* infill or green field development will necessarily require a corresponding upgrade of the electricity distribution network (which may involve the setting aside of land for a new substation).

Real Estate Branch
GPO Box 77 ADELAIDE SA 5001
1 Anzac Highway, Keswick SA 5035
T 0429 304 125 **F** 08 8404 5193
www.sapowernetworks.com.au

Prospective developers and those approving any development should give consideration to the current network capacity. Consideration should therefore be given to the long lead times in meeting any increased load demand, and the requirement for developers to contribute towards augmentation of the upstream electricity network along with funding direct costs associated with extension/connection of electrical infrastructure specifically for their development. Developers should contact SA Power Networks' Builders and Contractors line directly in this regard on phone number: 1300 650 014.

It is preferred that developers refer to the SA Power Networks Distribution Annual Planning Report for up to date augmentation information. This is a public report available at the following link,
http://www.sapowernetworks.com.au/centric/industry/our_network/annual_network_plans/distribution_annual_planning_report.jsp

If requiring further clarification or information, please do not hesitate to contact me further.

Yours sincerely,

[redacted]

[redacted]

Victor Harbor Council

1 Bay Road, Victor Harbor 5211

[redacted]

Dear Council,

It was with relief and gratitude that I received the notice that Council will not be going ahead with the rezoning of my property to Community Facilities.

I thank the Council for their decision.

In light of the changes to the draft 2 of the UGMS, I respectfully submit to Council that they consider extending the **Suburban Neighborhood** zone, whose northern boundary is Strawberry Hill Road, to encompass the land enclosed and bordered to the north of Strawberry Hill Road, on the East by Waterport Road, and on the West by Victor Harbor Rd.

This parcel of land is zoned Rural. It is within the Victor Harbor Urban Growth Boundary and is defined in the GARP as Future Greenfield Growth Area:

> **PlanSA - SA Planning & Property Atlas**
> Residential Broadhectare *Suburb:* HINDMARSH VALLEY *LGA:* VICTOR HARBOR
> *broad_cat:* Growth Area broadhectare (*source:* https://sappa.plan.sa.gov.au/)

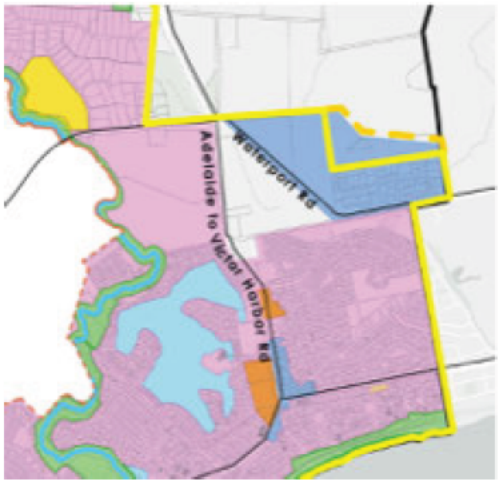
The **Suburban Neighborhood** zone would be a continuation of this zone from the South. This zone is very versatile in that it would give the three owners and council a reasonable and viable use of this area to accommodate requirements in the future (please see Maps below)**.**

Suburban Neighbourhood - *Low density housing is consistent with the existing local context and development pattern. Services and community facilities contribute to making the neighbourhood a convenient place to live without compromising residential amenity and character* (PlanSA Planning and Design Code).

Yours Respectfully,

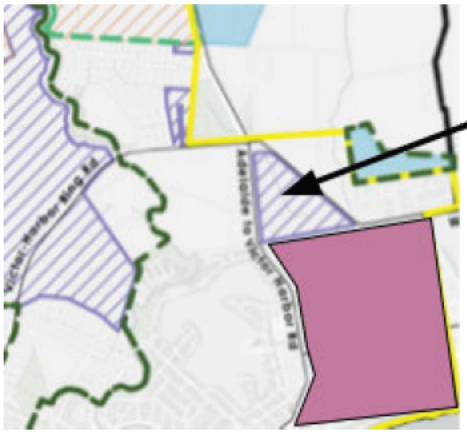
[redacted]

[redacted]



Low to Medium Density Residential

Urban Growth Boundary



Area of land bordered by Strawberry Hill Rd,Waterport Rd and Victor Harbor Rd

Future Greenfield Growth Area

Adjoining Suburban Neighborhood zone

Submission regarding current City of Victor Harbor planning perspectives from landowners [redacted] and [redacted] and [redacted] and [redacted]

Who are we?

- [redacted] and [redacted] are current property owners and ratepayers in the City of Victor Harbor through separately-owned residences in the [redacted].
- I addition to these holdings, the two families via their SMSFs invested three years ago in the property at [redacted] .... one of the two subject properties most relevant to this submission. This property is a [redacted].
- [redacted] owns via an inheritance from his deceased father a large parcel of land immediately to the [redacted] and traversing as well [redacted] to extend the full property holding to a total of [redacted].
- When combined, the two properties of some [redacted] offer the potential to house some 3,000+ lots with an average size of 300 square metres .... this calculation is offered for illustrative purposes only and ought not be interpreted as any specific intention to do so.
- The Council's senior leaders have met with [redacted] during the April visit which he undertook from Germany to the southern Fleurieu.
- [redacted] took part in the recent community consultation sessions about the local growth strategy held in the Council Chamber. [redacted] has been in verbal contact with other landowners who have holdings in the current [redacted] which we anticipate will become the subject of a Code Amendment application to become an approved Residential Zone.
- During 2025 we have all been active enquirers about what steps are involved in achieving the necessary Code Amendment from the Minister to allow the future commencement of design and construction of residential lots across the two properties identified above.
- We have decided to collaborate with each other to achieve the outcome of a Code Amendment to cover the full extent of both properties.
- [redacted] recently wrote an email to Council planners to express our strongest-possible objection to a proposal (advanced by neighbours further "down the hill" on [redacted]) that a Rural Living Zone be created on those tracts of our properties to the east of [redacted]. (*Please advise if this email needs to be re-sent! It is relevant.)*
- We have further engaged with planning consultants and have discussed with prospective local joint venture developers various elements of the rezoning processes and matters to contend with about residential property development on a scale such as what this project envisions.

What do we contend?

- We applaud the Council for the extensive community consultations held recently about the City's future growth strategy.
- We especially applaud the Council's intentions regarding both providing a 99-year lease access to developers /operators of the large Community Recreation Centre earmarked for 202 Armstrong Rd. The Council's willingness to invest almost $12 million in this project is the kind of signal that developers seek, and a great confidence provider to developers such as ourselves who seek to create residential housing to assist the Council achieve its projected population increases of the order of 8,000 people during the next 25 years.
- We also look forward greatly to learning more about the next stage of the formation of a Structure Plan. The relevance of this Structure Plan to our own aspirations is very clear .... as people who want to anchor our own property development contemplations and designs within the legitimate community development aspirations of both Local and State Governments, a Structure Plan presents as an ideal opportunity to bring landowners, developers, financiers and representatives of Government together to acknowledge the interdependence that unites all parties to actually get the vision ironed out and able to be executed.
- We would wish to be active participants over the next twelve months in the various stages of forming the Structure Plan.
- Logic dictates to everybody that the community voice and its many hopes also unites with local landowner aspirations; an aligned project emerges which will become a lighthouse residential subdivision to bring pride of place, residential amenity and social and recreational opportunity to future residents of the subject zone.

Conclusion

In essence, we stand at the ready.

Please continue to communicate as positively and as effectively as what you are already doing, so that we can be that kind of good-citizen active-collaborator group to see mutual benefits from what beckons us with this process.

Outlook

UGMS submission - DEW (Environment, Heritage & Sustainability)

From David Read <dread@victor.sa.gov.au>
Date Fri 01/08/2025 09:09
To Kayla Gaskin-Harvey <kayla@futureurban.com.au>

1 attachment (2 MB)
DEW comments_updated VH UGMS 2050_July 2025.docx;

David Read | Strategic & Policy Planner

City of Victor Harbor
1 Bay Road, Victor Harbor SA 5211
P 85510536 | **M** 0421053116
E dread@victor.sa.gov.au | www.victor.sa.gov.au



The City of Victor Harbor acknowledges the Ramindjeri and Ngarrindjeri people, the Traditional Custodians of the land and surrounding waters where we live and work. We acknowledge their deep connection to Country and pay our respects to Elders past, present and emerging. This respect is extended to Aboriginal and Torres Strait Islander people across Australia.

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From: Smith, De-Anne (DEW) <De-Anne.Smith@sa.gov.au>
Sent: Thursday, 31 July 2025 4:37 PM
To: David Read <dread@victor.sa.gov.au>
Subject: IREC40317825 - SM18.20.030 - DEW comments - Victor Harbor Urban Growth Management Strategy 2050 - Open for Consultation

OFFICIAL

Hi David

Albeit slightly past the extended consultation period please find attached comments from the Department for Environment and Water (DEW) on the updated draft Urban Growth Management Strategy. Thanks for engaging with us and it was great to see some of our previous comments reflected in the Strategy.

If you have any questions in relation to these comments pleases don't hesitate to contact me using the details below.

Kind regards

De'Anne

De'Anne Smith
Principal Planning Officer
I am only in the office on Wednesday and Thursday.

Planning & Assessment | Environment, Heritage and Sustainability
Department for Environment and Water
P (08) 7133 7346
Level 8, 81-95 Waymouth Street, Adelaide, 5000
GPO Box 1047, Adelaide, SA 5001, AUSTRALIA

environment.sa.gov.au

Government of South Australia
Department for Environment and Water

Helping South Australians conserve, sustain and prosper

We acknowledge that the lands that we live and work on are the traditional lands of South Australia's First Nations peoples. We pay respect to the traditional custodians of these ancestral lands and acknowledge their deep spiritual connection to Country.

From: David Read <dread@victor.sa.gov.au>
Sent: Wednesday, 9 July 2025 3:42 PM
To: Smith, De-Anne (DEW) <De-Anne.Smith@sa.gov.au>
Subject: RE: Victor Harbor Urban Growth Management Strategy 2050 - Open for Consultation

No problem at all De'Anne, the consultation period has been extended to 21 July 5pm (being circulated, as of this morning)

David Read | Strategic & Policy Planner

City of Victor Harbor
1 Bay Road, Victor Harbor SA 5211
P 85510536 | **M** 0421053116
E dread@victor.sa.gov.au | www.victor.sa.gov.au



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DEW comments – updated draft Victor Harbor Urban Growth Management Strategy 2050 – July 2025

Native Vegetation

- DEW supports the Actions 4.1E and the DEW, Native Vegetation Branch is available to assist Council in the Heritage Agreement process.

- DEW supports Action 4.3B but notes that the reference to Native Vegetations Credit Register should be 'Native Vegetation SEB Credit Register'

Coast

- As the draft Strategy states, Victor Harbor's context is unique in that it is the only regional centre or satellite city within Greater Adelaide that is on the coast. From this perspective DEW supports that the draft Strategy acknowledges the coastal protection and adaptation management challenges and flags risk areas and the need to adapt over time to these risks.

- Action 4.6A is consistent with the Actions identified under the Coastal Environment section of the Natural Resources, Environment and Landscapes theme of the Greater Adelaide Regional Plan (GARP), with DEW assigned as the responsible party:

    - "Update coastal processes and hazard mapping including coastal flooding and storm surge, dune drift and coastal mangrove and saltmarshes to inform spatial amendments to the Coastal Areas Overlay and Coastal Flooding Overlay."
    - "Initiate a Code amendment to amend the Coastal Areas Overlay, to update coastal flooding policy and associated finished ground and floor level Technical and Numeric Variations."

    DEW is in the early stages of planning for a Code Amendment that will address the matters identified in the GARP. Noting that the draft Strategy sets out how Council intends to manage growth over the next 25 years, it is anticipated that the Code Amendment referenced in the GARP will investigate how the Planning and Design Code can be amended to appropriately identify and address coastal hazard risks (including those associated with sea level rise) beyond 2100. Council will have an opportunity to provide a submission on the draft Code Amendment to ensure that the areas of risk are considered through appropriate policy updates and associated mapping.

- Any future growth areas (including infill development where open space for wetlands is limited) needs to ensure that stormwater discharge to the coast is minimised via WSUD etc so that sensitive benthic habitats within the Encounter Marine Park Habitat Protection Zone are protected. Suggest that Action 4.6B be expanded to include this outcome. Below provides further detail to assist Council in considering this matter.

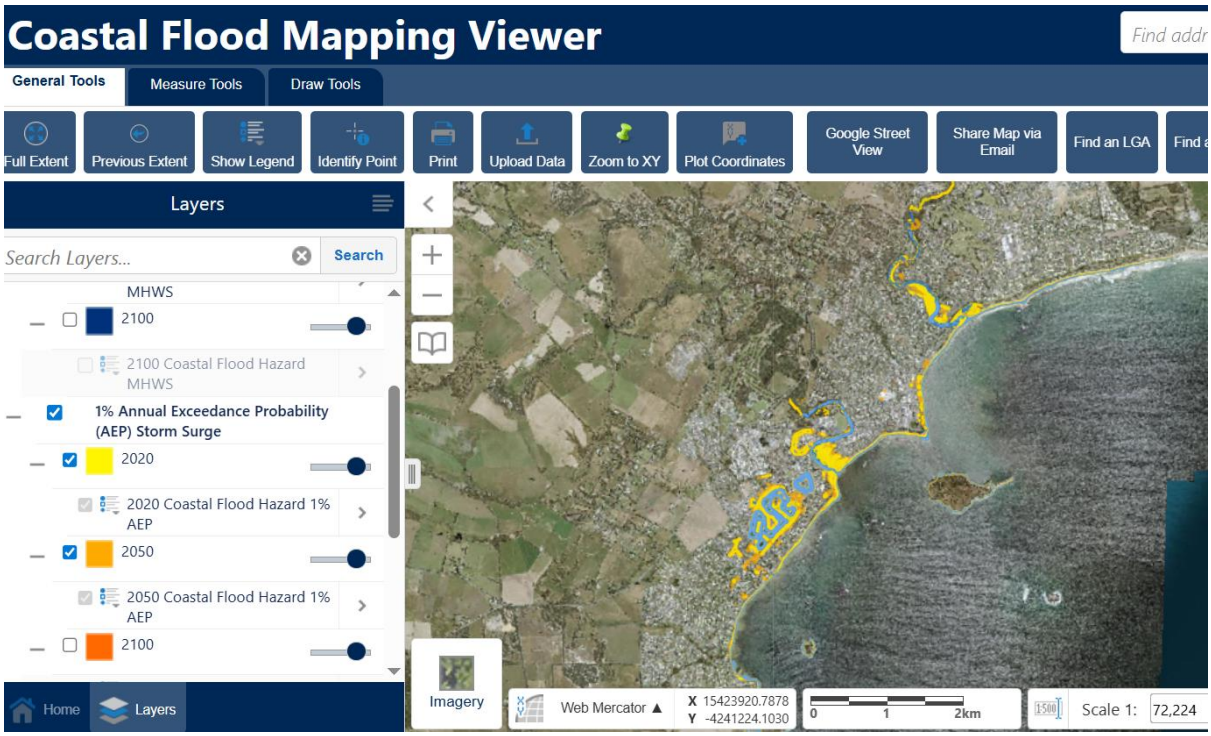
    Disclaimer

    The data provided in this tool has been developed to help communicate the risks of sea level rise and storm surge. The coastal flood mapping should be considered approximate only and is designed to be used at a regional scale to assist in identifying areas at greater risk of coastal flooding and in prioritising adaptation options. The data is not provided as

professional advice and should not be relied upon for site specific decision making or for making financial or any other commitments.

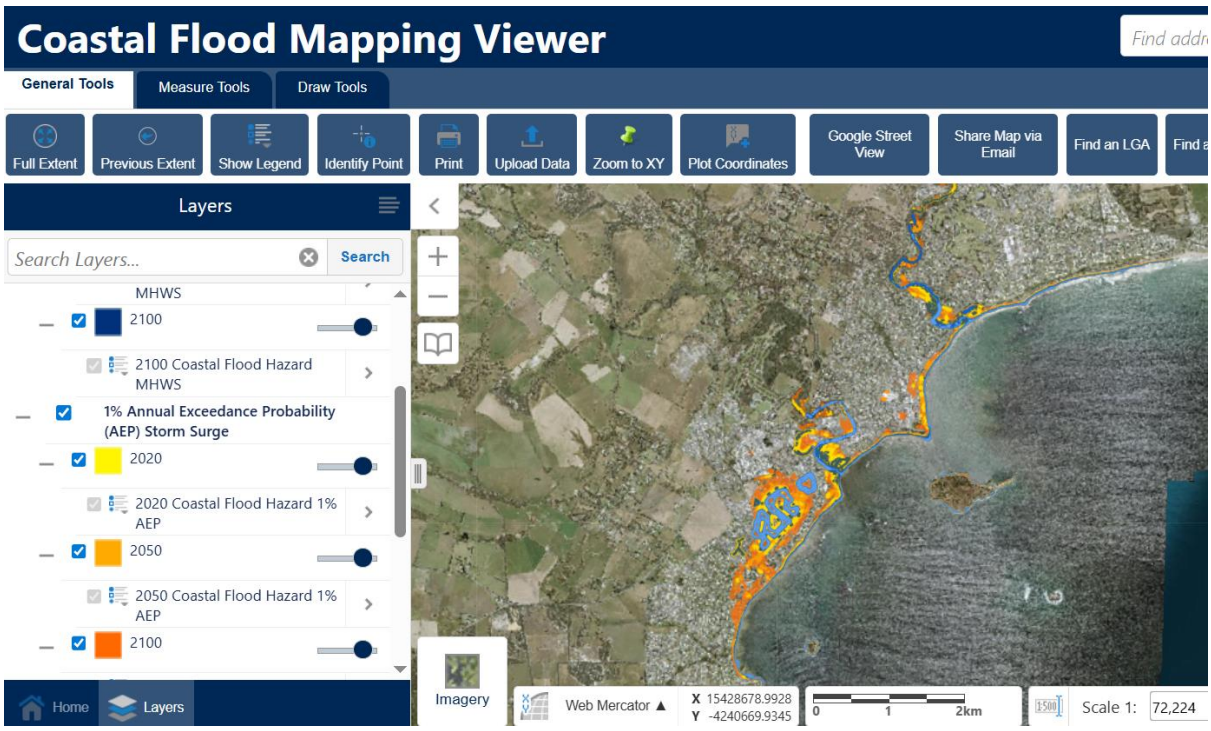
This is a broad scale mapping tool for visualisation purposes only. For a more detailed understanding at local levels a detailed assessment is required to determine local scale implications and inform management decisions. The mapping has limitations which users need to be aware of, including there is no allowance for:

• Recent, modified or proposed barriers (e.g. Seawalls, levees, etc.)
• Hydraulic flow restrictions, such as the width and depth of channel flow paths for flooding (i.e. can enough sea water flow through a restriction to fill the low lying area during the duration of the storm surge event).
• Coastal erosion hazard.
• Future changes to the landform, through uplifting or movement of tectonic plates or through the installation of man-made structures since the original LiDAR was captured.
• Coincident flood risk from inland (e.g. rainfall or river) sources.
• Inland coastal areas beyond the extent captured through the LiDAR, so any land further in-land will not show in the scenarios



Marine High Water Spring Tide to 2050 inc 2050 Coastal Flood Hazard 1% AEP

DEW comments – updated draft Victor Harbor Urban Growth Management Strategy 2050 – July 2025



Marine High Water Spring Tide to 2100 inc 2100 Coastal Flood Hazard 1% AEP

While, this is bathtub modelling, (see disclaimer above) coastal flooding hazard risks should be clearly identified and adaptation plans and adaptation pathways prioritised by Council in liaison with community. Noting that there are infill development in areas within the Urban Growth Boundary that are subject to coastal flooding hazard risks, where the risk will increase with continued sea level rise.

DEW notes that the draft Strategy acknowledges a number of these matters:

- Page 35 acknowledges in 1.5 that –“ Urban Growth Areas are not located in areas that are exposed to a high hazard risk, including bushfire, drought, flooding and heatwaves
- Pg 49 - 3.4 acknowledges inland flooding risks “3.4 - The impacts of flooding within Victor Harbor are reduced through water sensitive urban design and ensuring stormwater management systems are designed to account for rainfall events which will occur at a greater intensity as our climate changes”.
- Pg 54 - 4.5 urban environment can adapt to the effects of climate change
- Pg 55 captures most DEWs previous comments e.g. 4.6 coastline is protected from the impacts of urban development.
- 4.6B that captures that frequent and intense storm events have led to large volumes of stormwater being discharged directly onto the beach.

While DEW notes that the draft Strategy addresses a number of matters such as hazards, inland flooding etc, DEW considers that the issue of stormwater being reused and redirected away from the coast due to the impact of discharges impacting on beach levels but also on the offshore sensitive marine ecosystems within Encounter Bay within the

Habitat Protection Zone of the Encounter Marine Park is a matter that should be considered.

Stormwater not only scours the coastlines where it exits out onto beaches but also impacts sensitive offshore seagrasses and intertidal and subtidal algal reef off Victor Harbor through elevated nutrient levels and sedimentation, which can result in the widespread loss of seagrass beds and impacts to sensitive temperate reef ecosystems off Victor Harbor.

Stormwater flows can accelerated coastal erosion, destabilised the shoreline, and contributed to the degradation of sensitive marine habitats. With the extensive seagrass meadows off the coastline of Victor, increased stormwater impacts from increased urbanisation can lead to seagrass loss which in turn results in seabed erosion and increased seabed deepening leading to increased wave attack and accelerated coastal erosion which has occurred off a number of South Australia's urban areas including Adelaide and Beachport where seagrass loss due to urbanisation has led to significant increases in coastal protection infrastructure.

- Recommended additional references that could have been reviewed as part of the draft Strategy e.g. not included on the list on page 75:

  Southern Fleurieu Coastal Action Plan (2007): which recommends redirection of urban stormwater away from direct coastal discharge points. (Currently Under review 2025)

  Stormwater Management Authority (SA) Strategic Plan 2021-2030: Reduce environmental impacts from urban run-off entering streams and coastal environments.

  Victor Harbor Stormwater Management Plan
  https://www.victor.sa.gov.au/__data/assets/pdf_file/0025/1611394/Victor-Harbor-Urban-Stormwater-Management-Plan-with-maps-webres.pdf

Heritage

- DEW supports Action 5.4 to undertake a Code Amendment to implement the recommendations of the Inter-War Heritage Survey.

Other comments

- Typo – Pg 14 – under 'Activating Victor Harbor' heading – 'Supporting the protection and enhancement of key lifestylekey lifestyle appeal for Victorfor Victor Harbor, including our environment, events, arts and culture.'

- Suggested addition – Pg 14 Under 'Climate Change' – include the following 'This will result in Victor Harbor being warmer and drier and with more regular and intense storm events and continued sea level rise due to climate change.'

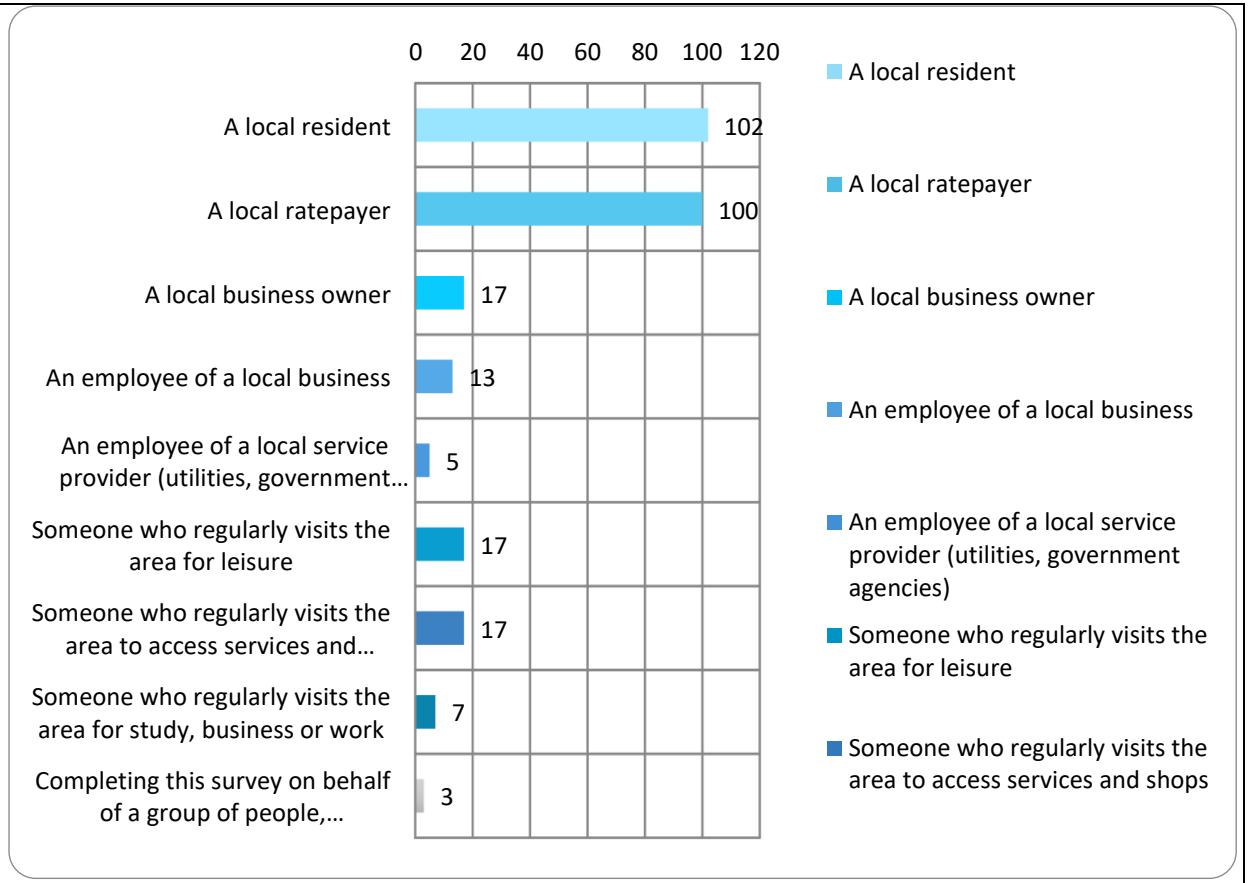
APPENDIX 4. SUMMARY OF SURVEY RESPONSES

SurveyTool:	Draft Urban Growth Management Strategy Feedback Survey	12 June 2025 to 28 July 2025

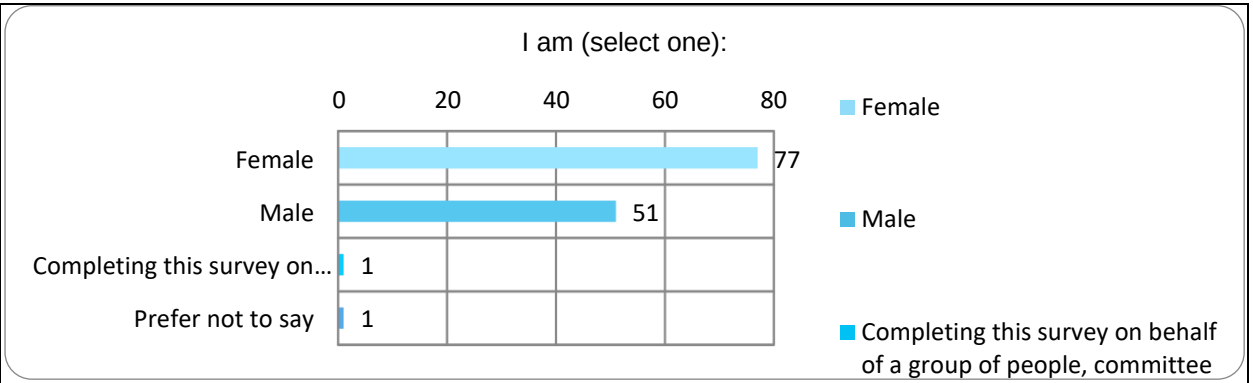
Survey Responses Graph

special characters like '&' will be removed from options

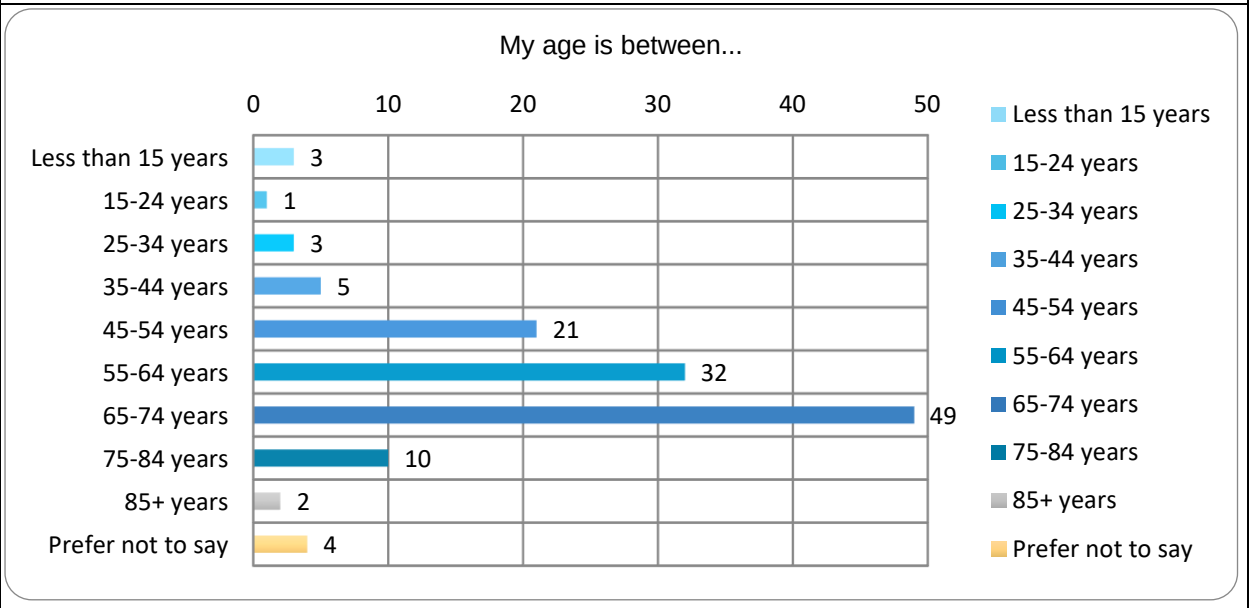
I am (select all that apply):	
A local resident	102
A local ratepayer	100
A local business owner	17
An employee of a local business	13
An employee of a local service provider (utilities, government agencies)	5
Someone who regularly visits the area for leisure	17
Someone who regularly visits the area to access services and shops	17
Someone who regularly visits the area for study, business or work	7
Completing this survey on behalf of a group of people, committee or organisation	3



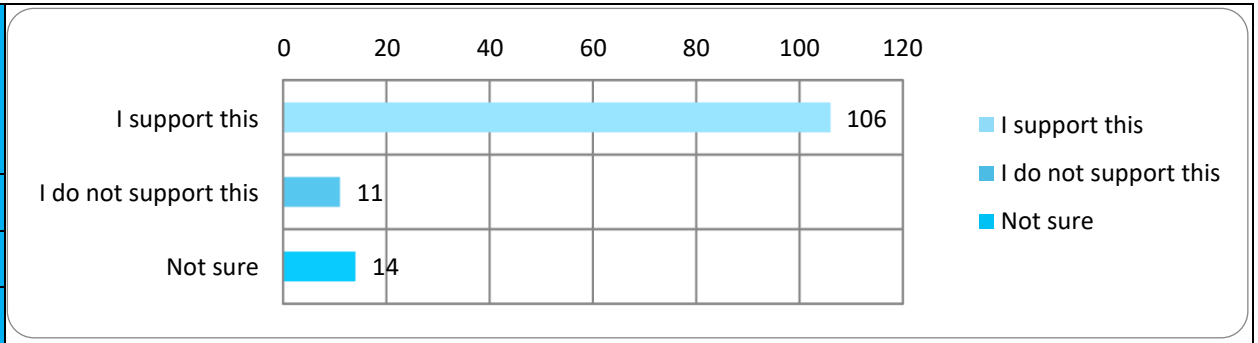
I am (select one):	
Female	77
Male	51
Completing this survey on behalf of a group of people, committee or organisation	1
Prefer not to say	1



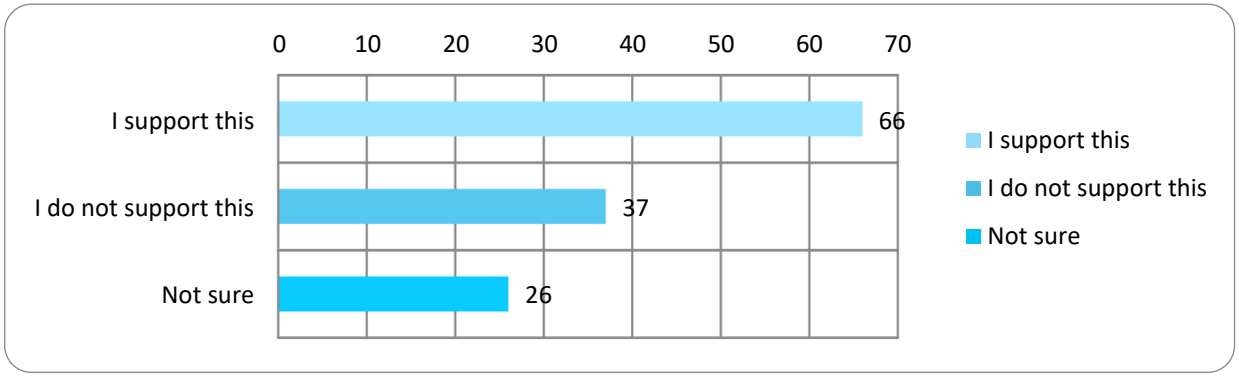
My age is between (select one):	
Less than 15 years	3
15-24 years	1
25-34 years	3
35-44 years	5
45-54 years	21
55-64 years	32
65-74 years	49
75-84 years	10
85+ years	2
Prefer not to say	4



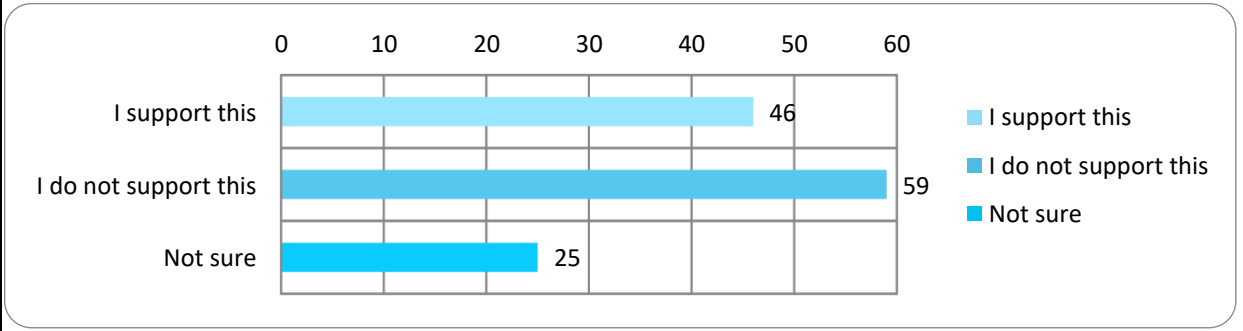
Do you support Council creating opportunities for young people and families to build or buy a home in Victor Harbor?	
I support this	106
I do not support this	11
Not sure	14

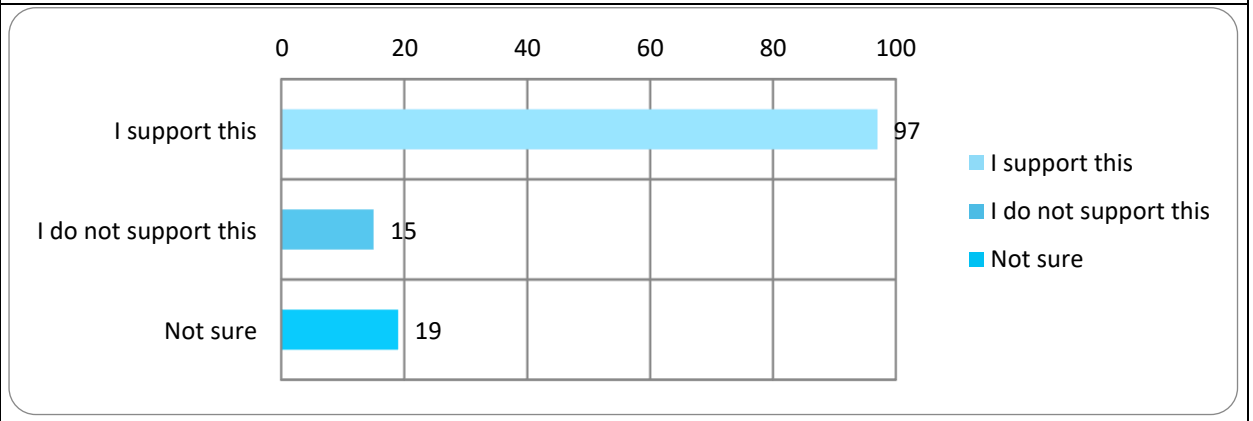
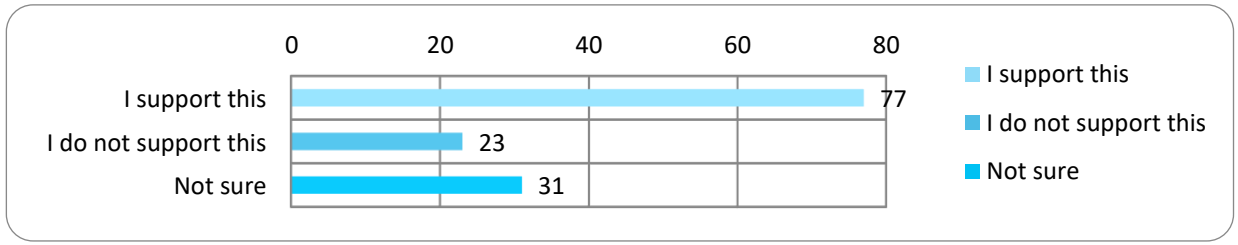


Do you support Council focussing on one priority growth area for housing, being along Welch Road / Armstrong Road / the Ring Route / Waggon Road?	
I support this	66
I do not support this	37
Not sure	26

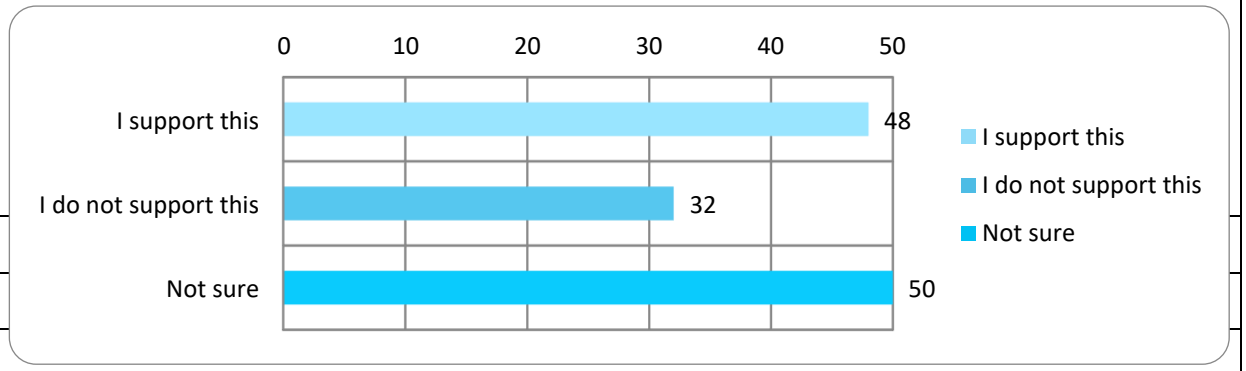


Do you support Council reducing the extent of rural living areas which were being investigated for smaller allotment sizes?	
I support this	46
I do not support this	59
Not sure	25

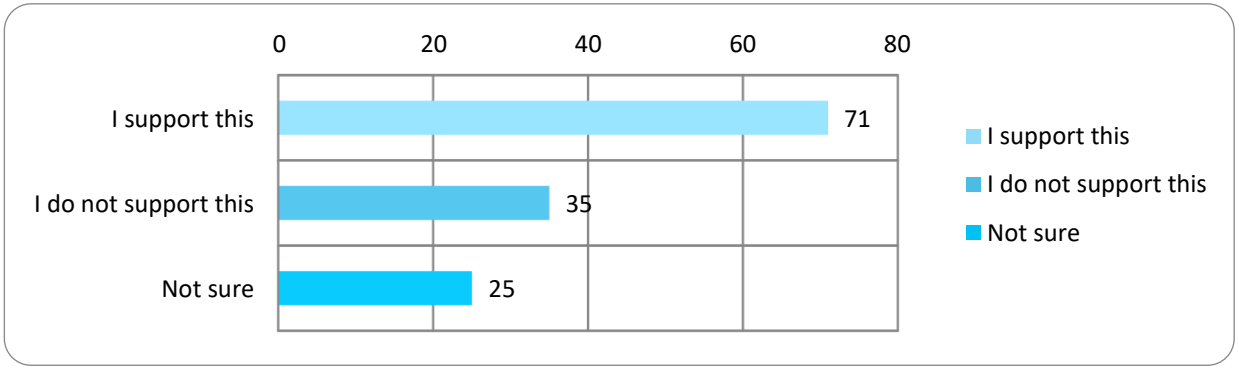


Do you support actions which seek to change the population trajectory of Victor Harbor by being a more attractive, dynamic and sustainable place for young people to live, work and study?		
I support this	97	
I do not support this	15	
Not sure	19	
Do you support securing a future activity centre at Encounter Bay?		
I support this	77	
I do not support this	23	
Not sure	31	

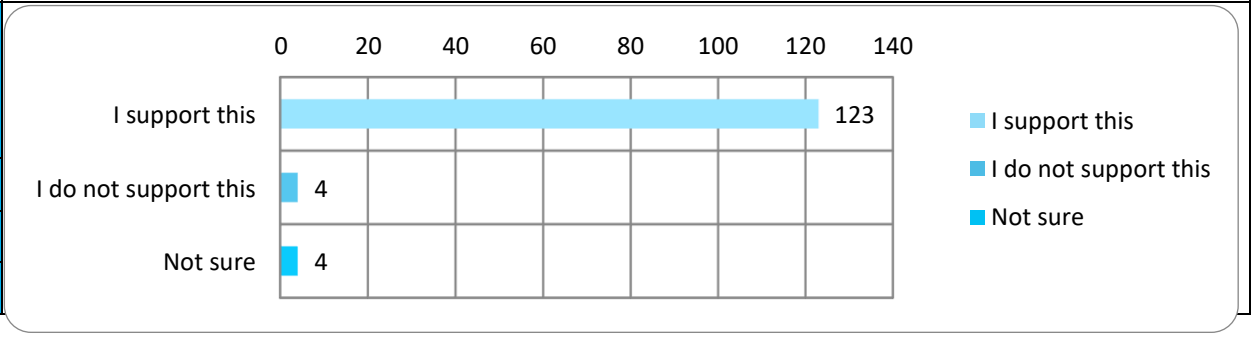
Do you support focusing the potential for new activity centre within the 'priority growth area' and removing any actions relating to rezoning commercial land on Adelaide Road / Waterport Road?	
I support this	48
I do not support this	32
Not sure	50



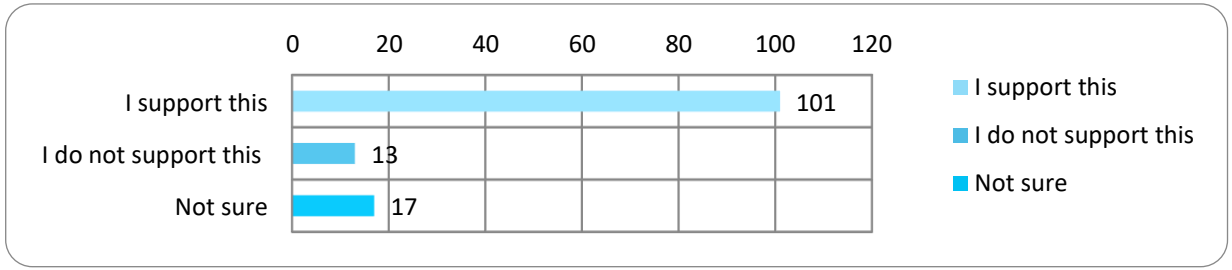
Do you support increasing the area envisaged for future employment purposes to the north of Waterport Road and prioritising the rezoning of this land?	
I support this	71
I do not support this	35
Not sure	25



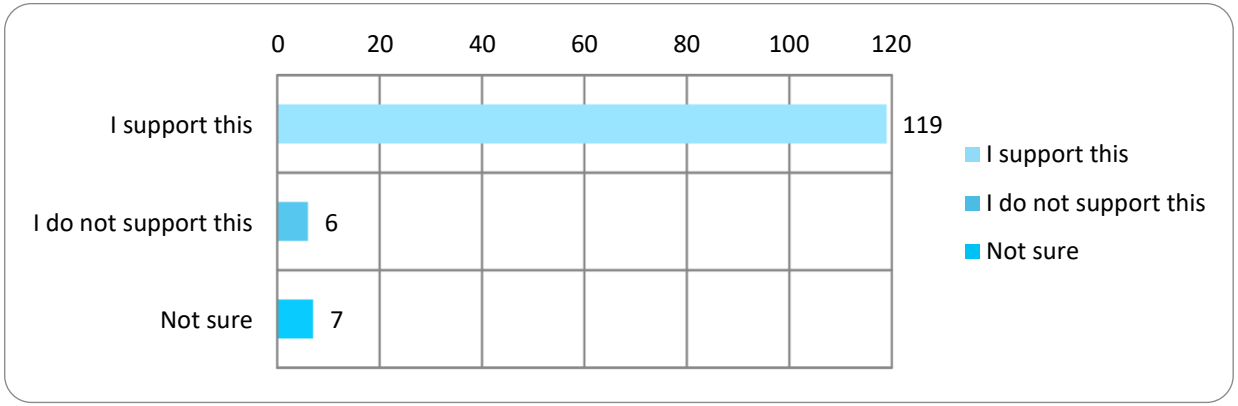
Do you support ensuring that key farming or primary production activities are identified and protected from incompatible land uses?	
I support this	123
I do not support this	4
Not sure	4



Do you support Council preparing a business case for Council to support the provision of childcare, particularly for children under the age of three (3)?	
I support this	101
I do not support this	13
Not sure	17



Do you support committing to establish key wildlife corridors, particularly an east to west corridor that links the Hindmarsh and Inman Rivers in order to protect and enhance biodiversity?	
I support this	119
I do not support this	6
Not sure	7



ADDITIONAL FEEDBACK RECEIVED THROUGH SURVEY

Category	Number of Mentions	Feedback
Housing	7	There needs to be more land and affordable packages for families and younger / support initiatives that attract families
	5	Young families / urban greening requires bigger allotments (>800m2)
	3	Disappointed that area was removed as a Rural Living Infill Investigation Area (one submission related to Morgan Park and two submissions related to Bulter Rise)
	3	Do not support a reduction of minimum allotment sizes in residential or rural living areas
	3	Do not support the Adelaide Road growth area (#2 on Map 2)
	3	Ensure amenity for new developments
	2	Don't support residential or commercial development beyond the 'ring route'
	2	Increase density in the town
	2	Support the development of a Structure Plan for the Priority Growth Area
	1	Avoid 'gutter to gutter' housing
	1	Do not support infill development between the rivers
	1	Don't support Priority Growth Area but do support rezoning land for 'greenfield'
	1	Increase proposed area for housing on Inman Valley Road (and reduce area on Adelaide Road)
	1	Restrict the number of houses
	1	Rural living areas in the Priority Growth Area should have minimum allotment size of 2000-4000m2
	1	Support and encourage changes to policy to support granny flats
	1	Support the reduction in 'Rural Living Infill Investigation Areas'
	1	Would support growth of several areas rather than one growth area (so as not to cause congestion in one area)
Economy	4	Need to protect the right to farm
	2	Council should focus on attracting professional services industrial and investing heavily in tourism attractions
	2	Encounter Bay needs retail centre

Category	Number of Mentions	Feedback
Economy	1	Do not support commercial / employment on Waterport Road
	1	Emerging Activity Centre at the Corner of Victor Harbor Ring Road and Waggon Road is out of character
	1	Need more employment opportunities
	1	Support Emerging Activity Centre adjacent Waggon Road
Infrastructure	22	Local services are at capacity / services need to be increased to accommodate growth
	14	Traffic is an issue
	9	Speed limits / intersection treatments near housing and key intersections should be reviewed
	6	Parking in the CBD is a problem
	2	More recreational opportunities (such as a bowling alley or play café)
	2	Provide quality child care to support families
	2	Should include a plan showing connected walking and cycling pathways
	1	Extend Airport Road to Waterport Road
	1	Impact on Waggon Road and surrounds needs to be clearly articulated
	1	Need additional recreational facilities in Encounter Bay
	1	Non motorised transport must be supported
	1	Public transport requires a greater focus in the UGMS
	1	Put in infrastructure and raise the rates
	1	Seal Day Road
	1	Water pressure at Encounter Bay has dropped since development has occurred
Environment	12	Protection of (and enhancement of) green space/corridors and biodiversity is important.
	6	Preservation of the coast and coastal character is a priority
	5	Watercourses should have a large buffer (for flooding and biodiversity) (one survey suggested 300m)
	2	Need management strategies for accessing the coast and beaches
	1	Need to consider fauna, particularly on Waterport Road and the proposed employment area
	1	Stop cutting down established eucalypts

Category	Number of Mentions	Feedback
Character	6	Preservation of the coast and coastal character is a priority
	6	Protect character / heritage areas
	1	Do not support growth near the hills face
	1	Hills face protections should be increased for Waterport Road
Financial Sustainability	3	Consider a levy for homeowners who only use property for 2 months/year and Airbnb's / consider initiatives to entice homeowners to live locally
	1	Introducing a levy on unoccupied houses puts a disproportionate cost burden on houses that require less Council services
Other	1	Make Council priorities on Map 2 clearer
	1	Maps are hard to read