

ADDENDUM TO PLANNING PROPOSAL PP-2021-5594

Post Gateway Determination

Reduction of Minimum Lot Size from 3000m² to 1000m²

Lot 17 DP258661 17 Maiden Smith Drive, Moama

Document Control

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TABLE OF CONTENTS

INTRODUCTION4
ITEMS RAISED UNDER THE GATEWAY DETERMNATION4
(a) Outline potential lot yield of the subject land4
(b) Outline the recent rezoning history of the subject land
(c) Clarification of the current supply of residential zoned land in Moama7
(d) Provide discussion and justification for the introduction of 1,000m2 MLS in
Moama and on this site15
(e) Discussion on potential of the rest of the Maiden Smith Drive precinct for
infill development
(f) Consideration of the co-existence with tourism development as identified in
the Murray Shire Strategic Land Use Plan18
CONCLUSION

INTRODUCTION

Planning Proposal PP-2021-5594 seeks to reduce the minimum lot size (MLS) effecting Lot 17 DP 258661 (17 Maiden Smith Drive, Moama) from 3000m² to 1000m². No change is sought in respect to the current R2 Low Density Residential zoning. The Planning Proposal was prepared by Habitat Planning and endorsed by Council at the meeting of 4 November 2021. The Planning Proposal was forwarded to the Department of Planning & Environment (DPE) on 9 November 2021, with the Gateway Determination issued by DPE on 17 December 2021. This Addendum has been prepared in response to the items raised within the Gateway Determination. All other items raised within the Planning Proposal and associated attachments.

ITEMS RAISED UNDER THE GATEWAY DETERMNATION

Prior to the community consultation of the Planning Proposal, response to Condition 1 of the Gateway Determination is required to be provided or assessment by DPE. Items 1(a) to (f) of the Gateway Determination are addressed in this section.

(a) Outline potential lot yield of the subject land

Based on the size of the land (3.08 hectares), the proposed minimum lots size (1000m²), and an allowance for area required for infrastructure to service lots, the potential lot yield would be approximately 24 lots. An indicative lot layout has been provided in the Test of Significance submitted with the Planning Proposal (see page 9 of the Test of Significance).

(b) Outline the recent rezoning history of the subject land

The subject land was part of a broader Planning Proposal identified as PP_2016_MURRA_001_00. The Planning Proposal resulted in the R5 zoned area of Maidensmith Drive (shown in the figures below and including the subject land) being rezoned to R2 Low Density Residential and a reduction of the MLS from 5000m2 to 3000m2. See figures provided below for previous zoning and MLS.

The timeline of the Ma	aiden Smith Drive	Planning Proposa	l is outlined helow.
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3 March 2015	Council staff report recommended reduce MLS from 5000m ² to 2,000m ² north of Maiden Smith Drive. However, Council resolved to not support planning proposal.
13 April 2015	Proponent submitted pre-Gateway Review to Department to rezone from R5 Large Lot Residential to R2 Low Density Residential and amend MLS from 5000m ² to 2000m ²
12 May 2015	Department referred planning proposal to Joint Regional Planning Panel and recommended rezoning R5 to R2 and amend MLS from 5000m ² to 3000m ²
13 August 2015	Panel recommend retain R5 and MLS 5000m2 for river facing lots and support other lots in estate being rezoned to R2 and amend MLS to 3000m ²
27 April 2016	Gateway determination issued to rezone R5 to R2 and amend MLS 5000m ² to 3000m ² for all 23 lots in Maiden Smith Drive precinct
7 April 2017	Murray LEP 2011 Amendment No. 5 notified





Figure 1 – former and current Zoning and Minimum Lot Size mapping

(c) Clarification of the current supply of residential zoned land in Moama

Discussion regarding the supply of existing residential zoned land is provided below, broken down into zoned land without active subdivision approval, and zoned land with subdivision approval. Discussion has also been provided regarding the anticipated supply/growth requirements of Moama. All figures are current as at the date of the report and are subject to change based on the progression of approved subdivisions through various milestones and new dwelling applications received since the date of this report for subdivisions and dwelling houses.

Existing zoned areas with no approval/active application

Moama currently contains approximately 72 hectares of residential zoned land which is not affected by an active subdivision approval or subdivision development application. This land is zoned R1 General Residential, R2 Low Density Residential, or R5 Large lot Residential and ranges from zero MLS up to 4000m2. The theoretical lot supply of this land has been estimated at 535 lots. Potential Lot Yields (PLY) have been calculated based on:

 $PLY = \frac{Total area of lot}{Minimum lot size} - 25\% area to account for servicing infrastructure (roads etc.)$

The 25% reduction for servicing areas has been applied based on observations from existing subdivisions however this does not take into consideration the provision of public open space. The specific designs of subdivisions may also vary considerably based on factors which cannot be accounted for (i.e. the intention of the developer to provide a mix of densities within the subdivision larger than the MLS). The potential estimated yields do not account for existing dwellings or infrastructure located on the land. The location of such may reduce the available yield however this factor cannot be determined at this stage. These figures and rates of estimated supply are also subject to variables including:

- Timing of release of lots to market
- Timing of approval, construction, and title release
- Timing of housing construction
- Ability/intention of owner to seek approval for subdivision (some owners may not wish to further subdivide despite the opportunity being available)

Table 1 shows the breakdown of land supply based on existing zone and MLS. The areas taken into consideration for the purposes of these calculations are shown by the red outlines in Figure 2. Owners have commenced discussion with Council regarding commencing the development applications process for subdivisions on land indicated by the yellow circles.

Residential zoned vacant land (no approval)	MLS	PLY
R1 zone	Nil	60
R1 zone	450m2	274
R1 zone	750m2	96
R1 zone	2000m2	18
R2 zone	1000m2	4
R2 zone	3000m2	37
R5 zone	4000m2	46
	TOTAL	535



Figure 2 - Areas of existing residential zoned land (no active approval)

Existing zoned areas with active subdivisions

There are nine main subdivisions which are active within Moama. These subdivisions account for 1066 approved lots ranging in size from 450m² to 1500m² (approximately). Most are being released in stages, with around 15-30 lots in each stage. There are a further two longstanding subdivision approvals which have commenced (with ongoing consent) however are not under active construction. These subdivisions account for a further 33 lots A summary of the lot sizes and zoning of the lots is identified in Table 3. The locations of these active subdivisions are shown in Figure 3 below.

Zone	Lot size (m2)	Lots	Supply status	
R1	450-1500	1066	Lots under construction (SWC issued)	289
R5	4000	27	Lots constructed and awaiting	
Other	600	6	certificate of title issue (SC issued)	72
	TOTAL	1099	Remaining supply	738
			TOTAL	1099



Figure 3 - Areas of residential zoned land with active subdivision approval

Subdivision milestones and status

The general progression of a subdivision has been included in this section to provide context for the land supply process. The blue writing within Figure 4 indicates the relative number of lots (and stages) in Moama at each respective stage of the process. Within Moama, there are currently 738 lots across 29 stages which have not yet reached Subdivision Works Certificate (SWC stage), 488 of these lots have not yet been released for 'off the plan' sale. Of the 12 stages (289 lots) being constructed under an active SWC, a number of stages are nearing completion and are anticipated to have the Subdivision Certificate (SC) issued in the coming months.



Figure 4 - General subdivision milestones key figures for Moama

In reviewing a number of larger subdivisions approved since 2017 and completed to titling in Moama, the average lifespan of a subdivision stage (between 10-40 lots) was approximately 1 year from the issue of the SWC to the issue of titles. As shown above, Moama has 12 stages being constructed concurrently which are anticipated to be released to titling within the next 6-12 months. A further 72 lots (4 stages) are anticipated to be titled prior to August 2022.

Moama – 2021 Census

As at the 2021 census, Murray River Council had a population of 12,850, with 6,930 of those people residing in Moama. Between 2016 and 2021 (the previous census period) Moama saw a 18% increase in the population of Moama and a 16% increase in private dwellings. This equates to an average increase per year of just over 216 people and 87 new dwellings. We have also seen an increase in household size from 2.3 to 2.4 people. Snapshots of key census information from 2021 vs 2016, together with the census area boundary for Moama have been provide below in Figure 5



Moama Census Data – Statistical Area 2 (SA2) Area Code 109031184				
2016		2021		
People	5849	People	6930	
Median Age	47	Median Age	49	
Families	1572	Families	1939	
All private dwellings	2741	All private dwellings	3177	
Avg people per household	2.3	Avg people per household	2.4	

Figure 5 – 2016 and 2021 Census data comparison

PROJECTED HOUSING DEMAND

Scenario 1 – REMPLAN demand modelling

Council contracted REMPLAN to complete fine-grain town level projections out to 2041, which were finalised in May 2022. Council's projections split Moama into two areas – 'Moama East' and 'Moama West'- to delineate between servicing catchments and varying capacity to accommodate growth. These areas are defined below in Figure 6. It is noted that the 'Moama East' and 'Moama West' catchment areas are not the same as the census data area for 'Moama', even when combined. See Figure 7 which shows REMPLAN catchment areas overlayed into the larger Census Statistical Area 2 catchment for Moama. The REMPLAN projections predict that there will continue to be demand for housing in Moama East, however the majority of growth pressure will occur within Moama West. A summary of dwelling demand for Moama East and Moama West is set out below. A full breakdown of this data is available on Council's Website under our REMPLAN modules. It is important to note that the REMPLAN projections are based on a supply constrained model.



Figure 6 – REMPLAN catchment areas



Figure 7 – REMPLAN catchment areas vs Statistical Area 2 Census area

Moama East

Council forecast that the bulk of the Moama East projected growth will be accommodated within the 'Maiden's Green' Subdivision and Stages 5 and 6 of 'Barbers Paddock'. These developments allow for a total of 188 lots and based on the REMPLAN projections are anticipated to be depleted by approximately 2028. Some of the remaining dwelling demand will likely be accommodated via infill development into the older areas of Moama East, and the R5 zoned land along Cobb Highway, however any deficit in supply of new dwelling stock will need to be accommodated in Moama West. The supply of existing zoned land in Moama East which is not affected by a dwelling approval is zoned R5, and accounts for around 46 theoretical lots. Consumption of these lots would largely depend on market demand for lots 4000m².

MOAMA EAST	2016	2021	2026	2031	2036	2041
Dwellings	1941	2185	2331	2447	2557	2650
Total change		244	146	116	110	93
Annualised growth rate		2.40%	1.30%	0.98%	0.88%	0.72%
Population	4013	4545	4860	5054	5223	5357
Total change		532	315	194	169	134
Annualised growth rate		2.52%	1.35%	0.79%	0.66%	0.51%

Table 4 – Moama East dwelling and population projections – REMPLAN

Moama West

Based on the REMPLAN projections scenario for dwelling demand, Moama West will require 1072 new dwellings between now and 2041. Moama West contains the majority of active subdivisions with 247 lots under construction, and a further 49 lots at titling stage. In accordance with the dwelling demand projected by REMPLAN, these lots will likely be exhausted by approximately 2026. The projections show there is a healthy level of supply in the short term, however a significant drop off in supply will be experienced from 2029 onwards with decline from approximately 150 in 2023 settling into the 50's from 2029 onwards. The remaining approved supply (582 lots -which are yet to reach construction stage) are predicted to accommodate dwelling demand in Moama West to around 2037, however this supply will be at an increasingly constrained rate towards the end of the forecast period. This will likely have an impact on both availability and affordability within the Moama West area.

The remaining residential zoned land in Moama West which is not affected by a development consent for subdivision, accounts for a further 485 lots of theoretical supply, 430 of which could be average density lots (based on MLS) on greenfield areas, with the remaining 55 lots of low-density supply in the form of infill development within Maiden Smith Drive area. According to the REMPLAN modelling, this supply would provide approximately 291 more lots than the projected demand for dwellings in Moama West to 2041, however this would rely on the owner choosing to initiate the development of the land in the immediate future. The redevelopment of Maiden Smith Drive would also require significant private investment to upgrade servicing capacity.

MOAMA WEST	2016	2021	2026	2031	2036	2041
Dwellings	823	968	1238	1494	1761	2040
Total change		145	270	256	267	279
Annualised growth rate		3.30%	5.04%	3.83%	3.34%	2.99%
Population	1762	2065	2649	3204	3771	4376
Total change		303	584	555	567	605
Annualised growth rate		3.22%	5.11%	3.88%	3.31%	3.02%

Table 5 – Moama West dwelling and population projections – REMPLAN

Department of Planning & Environment forecasts

Based on population projections recently released by DPE, the population of Moama is forecast to steadily grow by 2.12% each year to 7,565 by 2026, and to 10,301 people by 2041. These projections largely align with Council's own town level projections. In both the DPE and the REMPLAN projections, data suggests that between 46-49% of growth will be accommodated in new dwellings, making it very important to keep new land supply available to accommodate future growth.

Scenario 2 – Development Approval Demand Modelling

Dwelling approval rates

Each financial year (FY) Council captures development data for housing approvals. As shown in the Table below, housing approvals in Murray River Council have been above 100 approvals per year since 2017 FY (the FY ending 30 June).

Financial Year (FY)	New approved dwellings (entire MRC LGA)	Located in Moama
2017 (FY)	106	86 (estimated)
2018 FY	94	82 (estimated)
2019 FY	114	92 (actual) (81%)
2020 FY	114	95 (actual) (82%)
2021 FY	165	147 (actual) (89%)
2022 FY	141	115 (actual) (82%)

 Table 6 – new dwelling approvals since 2017

Based on the above data, there have been an average of 103 applications approved each year in Moama since 2017 FY. If we apply a reduced average of 100 dwelling approvals/year in Moama, the approved active subdivision supply (1099 lots) within Moama would be exhausted within approximately 11 years. The land zoned residential, which is not affected by an approval (535 lots) would supply around 5 years on the proviso that the owners choose to seek approval in the immediate future. This simplistic assumption does not consider population growth rates, and the market demand for high, average, and low density housing stock which will impact this rate of take up.

Dwelling approval rates within approved subdivisions

Council staff have captured data for greenfield subdivisions in Moama which released lots between January 2015 and January 2022. Of the 624 lots released within these subdivisions, 493 (79%) have dwelling approvals issued, 70% of which were approved within 2 years of title issue with 62% of that figure issued within the first year of title release. As almost all lots released within Murray River Council are presold off the plan prior to construction and title release, it is anticipated that the approved lots already in the supply pipeline will be utilised for dwellings within the coming 2 years after the issue of land titles. It is also noted that construction of these lots will occur concurrently throughout various subdivisions, and as such the timing for release of title will likely also closely align. As noted in a previous section, Moama has 247 lots currently being constructed and a further 49 lots at title issue stage. Please see Table 7included below for further information relating to dwelling approval take up within greenfield subdivisions.

ESTATE	Total lots	Stages	Active yrs*	Dwelling approval issued	Approval within 1 year of title release (%)	Approval issued within 2 years of title release (%)
Dungala Estate	145	5	2014-2021	113	78%	78%
Winbi Park Estate	92	5	2013-2020	73	54%	70%
Barbers Paddock	95	6	2015- now**	91	81%	89%
Exclusively Moama 2731	37	1	2019-2020	20	54%	54%
Lakeview Estate	162	174	2012- 2022	123	65%	82%
River Sands Estate	24	1	2015-2020	14	46%	58%
Murray Banks Estate	69	3	2014-2018	59	53%	57%
TOTAL	624			493		
Average % Dwelling DAs approved within 1 year of title release 62%						
Average % Dwelling DAs approved within 2 year of title release 70						

* Active years indicate the date from Subdivision DA approval, to final title release of last stage ** last stage currently being constructed

(d) Provide discussion and justification for the introduction of 1,000m2 MLS in Moama and on this site

As discussed within the Planning Proposal, this site is positioned within an area of mixed developed densities ranging from 1000m² to 30,000m². The surrounding MLS within the Merool Road precinct are illustrated in Figure 8 below, showing 750m² MLS to the adjacent north-west, 1500m² and 2000m² to the south-west, and 3000m² to the south. A 1000m² MLS already exists in Moama (as shown in yellow circled area Figure 8 below) on land off Boundary Road to the south-east of this site - that land is also zoned R2 Low Density Residential. Additionally, as identified in the Planning Proposal, the *Murray Shire Strategic Land Use Plan 2010-2030* specifically advocates for the future infill/redevelopment of the Maiden Smith Drive area to a cited density of "1000m² to 1500m²". While 1500m² may also be an appropriate MLS based on the zoning of the site as R2 Low Density Residential, implementing a MLS of 1000m² at this site is considered suitably justified for this area, and Moama, as it will:

• Provide a suitable transition between the surrounding average and lower densities of the Merool Road area.

- Efficiently capitalise upon the existing infrastructure capacity of the area without jeopardising the existing average-to-low density character.
- Support future housing stock with a lot size which has proven attractive within Moama housing market, based on anecdotal evidence supplied by real estate agents and developers regarding lot sales. This lot size is also within the range which can support future development into Moama's most prominent form of housing; single dwellings with 3-4 bedrooms (see 2021 Census data).



Figure 8 – Minimum Lot Sizes for Merool Road/Maiden Smith Drive precinct

(e) Discussion on potential of the rest of the Maiden Smith Drive precinct for infill development

The Maiden Smith Drive precinct is serviced by raw and filtered water, and a lowpressure sewer rising main. Access to power and stormwater is also available. These services are provided via reticulated branch lines running from Merool Road, connecting subsequently into the mains infrastructure on Perricoota Road. Additionally, the lots on the southern side (river side) of Maiden Smith Drive are largely serviced by private septic systems. The existing services within Perricoota Road are as follows:

- Filtered water 225mm water main
- Raw water 225mm water main
- Drainage Stormwater pipe and pits (1050mm future development catered for in basin upgrade strategy adopted by Council)
- Sewer Sewer rising mains (150mm)
- Power Power substation

The lots shown by the red outline in Figure 9 below could be provided with direct access to the filtered water, raw water, rising sewer, power, and drainage available from the Perricoota Road mains without impacting the existing level of service, or

requiring major upgrades. Connection would likely require easements through some lots.



Figure 9 – Lots suitable for short term infill – connection directly to Perricoota mains

The remaining lots, shown by the red outline in Figure 10 below rely on the internal branch infrastructure, which is already at servicing capacity and experiences issues with respect to drainage and water pressure. As such, the capacity of this area for infill development above the current MLS would be reliant on significant upgrades to the water, sewer, power, and drainage infrastructure, including construction of kerb and gutter to replace the existing table/spoon drains. These upgrades would be at the cost of the developer. Murray River Council have planned upgrades to water, sewer and drainage infrastructure in the coming years, however these works are sought to alleviate existing servicing issues and are not proposed to increase the capacity of the area to accommodate intensified development.



Figure 10 – Lots unsuitable for short-term infill without significant infrastructure upgrade

(f) Consideration of the co-existence with tourism development as identified in the Murray Shire Strategic Land Use Plan.

The Murray Shire Strategic Land Use Plan identifies the Merool Road and Maiden Smith Drive area as "*Tourist/Residential*" and "*Future Tourist/Residential Stage 1*", as shown by the orange shading in Figure 11 below.



Figure 11 – Excerpt of Murray SLUP – orange area nominated as 'Tourist Residential'

The existing tourism facilities in the area identified by the SLUP and surrounds are shown below in Figure 12. These developments are long standing and were in operation prior to the adoption of the principal Murray Local Environmental Plan 2011 (adopted late 2011).





When the SLUP was written in 2010/2011 the plan noted the following (**bold** emphasis added):

"...Moama features a wide range of tourist accommodation and related facilities and has experienced a boom in this type of development over the past 10 years. It is reasonable to presume that tourist activities and accommodation will continue to expand in Moama. More recently there has been a trend away from the traditional caravan park type establishment to developments incorporating 'upmarket' cabins that are more akin to residential units. To maximise the tourist benefit, the larger of these developments generally seek to locate out of Moama on the river and this can create potential infrastructure problems for Council and environmental impacts. There are few sites remaining within Moama suitable for tourist development that are in close proximity to the river and above the flood level. The strategic response is to identify land within and out of Moama that is below the 1 in 100-year flood level and restrict its use through an LEP. Although tourist development can generally co-exist with residential development without too many problems, it is considered good strategy to nominate areas preferred exclusively for residential. This allows for tourist development to be focussed on particular precincts and minimise the risk of land use conflict ... ".

It is noted that the Principal Murray LEP 2011 zoned this land (and the Maiden Smith Drive area) R5 Large Lot Residential – a dedicated residential zone which prohibits the vast majority of tourism developments. It is further noted that under the current zoning,

the R2 Low Density Residential zone permits 'bed and breakfast accommodation' and 'camping grounds' with consent however prohibits the following:

- Caravan parks
- Commercial premises
- Entertainment facilities
- Function centres
- Hostels
- Registered clubs
- Retail premises (including food and drink premises)
- Tourist and visitor accommodation

As such, the development of this identified area under the former and current zoning has seen the existing tourism development operate amongst low-to-average density housing, however the expansion of tourism uses in the area has largely not occurred. The proposal does not seek to amend the zoning of the site, or any site in the vicinity, and as such, the existing co-existence between residential and tourism uses would remain unchanged from the established conditions.

It is further noted that since the adoption of the SLUP in 2012, formal tourist and visitor accommodation demand has been significantly affected by the introduction (and popularity of) hosted and non-hosted Short Term Rental Accommodation (such as AirBnB etc). The *State Environmental Planning Policy (Housing) 2021* conditionally exempts hosted and non-hosted short-term rental accommodation in dwelling houses from needing any formal Council consent. As such, a proportion of tourist and visitor accommodation in dwelling houses, with around 24 houses listed in Moama alone on one popular short term rental accommodation website.

CONCLUSION

This Addendum has responded to Items 1(a) to 1(f) raised in Gateway Determination issued in respect to Planning Proposal PP-2021-5594 and should be read in conjunction with the endorsed Planning Proposal and associated attachments. The Addendum confirms that the proposal could generate approximately 24 lots (subject to design) and will not impact the current capacity of the area to co-exist with established tourist developments in the Merool Road area. The proposed 1000m² MLS will provide a suitable transition between the existing residential development in the Maiden Smith Drive/Merool Road residential area and aligns with the lot size range specifically cited in the Murray SLUP 2012 for the redevelopment of the Maiden Smith Drive area. The proposal (and other lots adjoining Perricoota Road) can be suitably serviced by reticulated utilities without impacting existing service delivery in the area. This site is more suitable for short term infill development than the internal areas of Maiden Smith Drive based on the need for substantial infrastructure upgrades to support lot intensification of those internal areas below 3000m². Based on REMPLAN projections, Department of Planning & Environment (DPE) population forecasts, dwelling house approval rates, lot supply, subdivision approval milestone status, and current approved subdivisions, lots within Moama will be depleted within 11-15 years, noting that this rate may be accelerated based on the number of lots currently being constructed and soon to be titled. Residential zone land which is currently not affected by an approval for subdivision may add around 5 years to this supply, however this would be reliant on the land being approved for development in the immediate future, and appetite of the market for high, average, and low density lots.