

PLANNING PROPOSAL

Tamworth Regional Local Environmental Plan (TRLEP) 2010 Proposal to amend Rural Boundary Adjustment Provisions

- ❖ **Amendment of the rural subdivision provisions of the *Tamworth Regional Local Environmental Plan 2010 (TRLEP 2010)* to provide increased flexibility for rural boundary adjustments where one or more of the lots are less than the minimum lots size shown on the Lot Size Map.**

Part 1 – Objectives or Intended Outcomes

The objective of this proposal is to provide flexibility in the application of boundary adjustment provisions in the *RU1 – Primary Production* and *RU4 – Primary Production Small Lots* zones under the *Tamworth Regional Local Environmental Plan 2010 (TRLEP 2010)*. The planning proposal addresses circumstances where the lots do not meet minimum lot size shown on the *TRLEP 2010* Lot Size Map.

The proposal aims to address the concerns of rural property owners relating to limitations encountered by the application of boundary adjustment provisions under of the *TRLEP 2010*. The intended outcome is to provide the opportunity for affected landowners to make application for boundary adjustments in certain circumstances where they are currently restricted from doing so. The proposal does not provide for amendment to the *TRLEP 2010* Lot Size Maps or the potential creation of additional dwellings on rural lands in the Tamworth Regional Council (TRC) Local Government Area (LGA).

Part 2 – Explanation of Provisions

It is reasonably common that rural landholders may wish to undertake a boundary adjustment between holdings. Such circumstances may arise when a property is sold or to facilitate improved land management outcomes.

The *Tamworth Regional Local Environmental Plan 2010 (TRLEP 2010)* addresses boundary adjustment issues under clause 4.2, which aims to provide flexibility in the application of standards for subdivision in rural zones. It is proposed to amend clause 4.2 to provide improved land management outcomes and additional options in the purchase and sale of rural property.

The intent of the planning proposal is to permit subdivision in the *RU1* and *RU4* rural zones to effect realignment of boundaries between lots where one or both do not meet the minimum lot size shown on the *TRLEP 2010* Lot Size Map. This would be permitted on the basis that no additional lots or potential for additional dwelling houses would be created. Also, it would need to be demonstrated that the potential for land use conflict is not increased and that an unreasonable impact on agricultural capacity of the land will not result.

A clause in these general terms was proposed for inclusion in the draft *TRLEP 2009*, however, the clause was not included when the *TRLEP 2010* was published on 21 January 2011, by the Minister for Planning.

Part 3 – Justification

Section A – Need for the planning proposal.

A1. Is this planning proposal a result of any strategic study or report?

The planning proposal is consistent with the strategic planning direction outlined in the *Tamworth Regional Development Strategy (RDS)*. Relevant sections include:

6.2 Supporting and Protecting Rural Futures

6. Maintain viable farm sizes, the capacity to continue farming practices, minimise the fragmentation of the agricultural land resource and encourage the consolidation of small holdings.

(*Tamworth Regional Development Strategy 2008: Page 23*)

12.6 Implementation: Short Term Priorities

Supporting and Protecting Rural Futures

Encourage a wide variety of agricultural activities within the agricultural zones.

(*Tamworth Regional Development Strategy 2008: Page 67*)

This strategic planning recognises the importance of maintaining holding sizes while encouraging a range of agricultural activities to continue or be developed as the opportunity arises. The proposed amendments do not provide for the creation of additional lots or opportunities for additional dwellings to be erected.

The strategic analysis acknowledges that land use patterns need to be supported that sustain and strengthen the viability of rural lands to achieve land management outcomes and support agricultural operations of different types including family-run businesses.

A2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The planning proposal is the only legal method of amending the *TRLEP 2010* to provide more flexibility in the application of boundary adjustment provisions.

A3. Is there a net community benefit?

A notable net community benefit is identified in connection with the proposed amendments. (Refer to **attachment 1** for the analysis of net community benefit).

In summary:

- The proposed amendments recognise the benefits of flexible boundary adjustment provisions in terms of land management outcomes and rural real estate activity.
- The amendments target equity and parity by providing the opportunity for flexibility in the application of boundary adjustment provisions under the *TRLEP 2010* and generally within the lot size regimes shown on the *TRLEP 2010 Lot Size Maps*.

Consequently, it is considered that the resultant community benefit significantly outweighs the administrative cost of implementing the proposal.

Section B – Relationship to strategic planning framework

The planning proposal is consistent with the strategic planning direction outlined in the *Tamworth Regional Development Strategy (RDS)*, as noted above.

B1. Is the planning proposal consistent with the objectives and actions contained within the applicable regional or sub-regional strategy?

Tamworth Regional Council (TRC) is not subject to a regional or sub-regional strategy.

B2. Is the planning proposal consistent with the local council's Community Strategic Plan, or other local strategic plan?

The planning proposal is consistent with the TRC *Keychange Community Strategic Plan (CSP) 2022*.

The plan identifies a number of challenges for the future that are relevant to the planning proposal, including:

- Balancing the needs of city, village and rural lifestyles to ensure that each of our towns and villages retain their unique character and identity; and
- Managing the region's development in a way that respects the social and economic needs and environmental functions for the benefit of the community and future generations.

Relevant strategies prescribed in the (*Keychange CSP 2022: Pages 11&12*) include:

Theme	Objective	Strategy
A Prosperous Region	P1 A strong and diverse economic base	P1.2 Protect our agricultural industry
	P4 Sustainable growth	P4.1 Actively encourage people to relocate to the Tamworth Region
A Region for the Future	F1 Sustainability	F1.4 Support local supply chains e.g. live local, grow local, buy local
	F2 Council is respected by the community	F2.1 Represent and advocate community needs
	F3 Tomorrow planned for today	F3.1 Sound land-use planning to prevent and minimise land-use conflict

B3. Is the planning proposal consistent with applicable state environmental planning policies (SEPPs)?

Refer to **attachment 2**.

B4. Is the planning proposal consistent with applicable Ministerial Directions (s.117 directions)?

Refer to **attachment 3**.

Section C – Environmental, social and economic impact

C1. Is there any likelihood that critical habitat or threatened species, population or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

The proposal does not automatically confer a right to adjust rural boundary lines and matters including the effect on critical habitat or threatened species, population or ecological communities, or their habitats, are the subject of the development assessment process.

C2. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

No

C3. How has the planning proposal adequately addressed any social and economic effects?

The planning proposal has outlined how the related social and economic effects are anticipated to have a positive impact across rural land in the Tamworth Regional Council Local Government Area (LGA). (Refer to **attachment 1**)

Section D – State and Commonwealth interests

D1. Is there adequate public infrastructure for the planning proposal?

The subject lands are generally serviced by road, electricity and telecommunications infrastructure. As the proposal does not provide for an increase in the number of lots or dwelling houses it can be said that there is no ostensible increase in the demand for public infrastructure.

D2. What are the views of State and Commonwealth Public Authorities consulted in accordance with gateway determination, and have they resulted in any variations to the planning proposal.

As part of the planning process for the *TRLEP 2010*, Council implemented an extensive consultation process with a range of government agencies through the Section 62 process.

The views of State and Commonwealth Public Authorities will sought in accordance with a prospective gateway determination.

Part 4 – Mapping

The proposed amendment relates to the written component of Council's LEP. Consequently, no changes are proposed to the *TRLEP 2010* Maps.

Part 5 – Community Consultation

As part of the planning process for the *TRLEP 2010*, Council undertook and implemented an extensive consultation strategy engaging with the community using a range of means including; media, internet, community presentations and displays at each of the Council Branches (Barraba, Manilla and Nundle), as well as the Kootingal Library/Hall.

The concerns of some rural property owners were noted during the public consultation process regarding rural land management and Council responded by drafting and including a clause to address boundary adjustment provisions. However this clause was not included in the published *TRLEP 2010*.

An extensive community consultation strategy would be implemented in accordance with any prospective gateway determination. It is expected that the a 14 day exhibition period would be implemented with range of consultation mechanisms including; advertisements in local newspapers, media release, internet information, and displays at each of the Council Branches

Part 6 – Project timeline

The table below provides an indication of the timeline for the planning proposal.

Anticipated commencement date (date of Gateway determination)	October 2013 upon receipt of Gateway Determination by Council.
Anticipated timeframe for the completion of technical information	Technical studies have not been identified as a component of the planning proposal. The Department of Planning and Infrastructure Gateway Determination may make prescriptions relating to technical information.
Timeframe for government agency consultation (pre and post exhibition as required by Gateway determination)	November 2013 Subject to the requirements of a Gateway Determination, agency consultation would occur during the public consultation phase.
Commencement and completion dates for public exhibition period	11 to 25 November 2013
Dates for public hearing (if required)	Not identified as being required.
Timeframe for consideration of submissions	3 weeks
Timeframe for the consideration of a proposal post exhibition	6 weeks (partly in conjunction with consideration of submissions)
Date of submission to the Department and Parliamentary Counsel to finalise LEP	21 February 2014 (subject to Council resolution - 11 February 2014)
Anticipated date RPA will make the plan (if delegated)	May 2014
Anticipated date RPA will forward to the department for notification	May 2014

**ATTACHMENT 1: ANALYSIS OF NET COMMUNITY BENEFIT CRITERIA
RURAL BOUNDARY ADJUSTMENT PLANNING PROPOSAL**

EVALUATION CRITERIA	COMMUNITY COSTS AND BENEFITS		
	BASE CASE – CURRENT SITUATION (or COMMENT)	PLANNING PROPOSAL	COMMUNITY BENEFIT PER CRITERION
YES/NO (or other comment as applicable) Is the planning proposal compatible with agreed State and regional strategic direction for development in the area? YES	The broad application of the lot size provisions promotes the aim of protecting valuable agricultural land by reducing the opportunity for fragmentation of holdings. However, the implementation of the LEP results in inflexibility in considering the merits of proposed rural boundary adjustments in a range of situations.	The proposed amendments would provide the opportunity for Council to consider subdivision applications to effect boundary adjustments in certain circumstances that are not currently provided for under the <i>TRLEP 2010</i> without undermining the LEP or the intent of the overall <i>Tamworth RDS 2008</i>.	The planning proposal promotes the continued occupation of rural holdings in the Council LGA to maintain agricultural land management outcomes and provides greater flexibility for landholders when dealing with their land. A community benefit is identified for this criterion.
Is the planning proposal located in a global/regional city, strategic centre or corridor nominated within the Metropolitan Strategy or another regional/sub-regional strategy? NO	Not located in a specified area.	Not Applicable (NA)	NA
Is the proposal likely to create a precedent or create or change the expectations of the landowner or other landholders? YES	The current provisions of the TRLEP 2010 restrict the options available to landowners regarding rural boundary adjustments.	The proposal would provide greater flexibility for landholders to consider boundary adjustment options when managing their land. However the proposal would not set the precedent of providing for additional dwellings to be constructed.	While the proposal may change the expectations of landholders compared to the current situation, an unacceptable precedent would not result that would undermine the <i>TRDS 2008</i> and <i>TRLEP 2010</i>. A community benefit is identified for this criterion

Have the cumulative effects of other spot rezoning proposals in the locality been considered? What was the outcome of these considerations? NA	There are no spot rezoning under consideration for the land subject to the planning proposal.	NA	NA
Will the planning proposal facilitate a permanent employment generating activity?	The current provisions of the TRLEP 2010 aim to protect valuable agricultural land but restrict the options available to landowners regarding rural boundary adjustments.	The proposed amendments would provide more flexibility; however, permanent employment generation is not identified in connection with the proposal.	It is considered that the planning proposal may be benefit/cost neutral for this criterion.
STATUS QUO Will the planning proposal impact upon the supply of residential land and therefore housing supply and affordability? No	Residential zoned land or urban areas are not affected by the planning proposal.	NA	NA
Is the existing public infrastructure (roads, rail, utilities) capable of servicing the proposed site? Is public transport currently available or is there infrastructure capacity to support future public transport?	The current provisions of the TRLEP 2010 aim to protect valuable agricultural land but restrict the options available to landowners regarding rural boundary adjustments.	The planning proposal does not entail a potential increase in traffic or demand for infrastructure relative to existing provisions.	It is not considered that additional pressure would be placed on existing infrastructure. It is considered that the planning proposal may be benefit/cost neutral for this criterion.
STATUS QUO Will the proposal result in changes to the car distances traveled by customers, employees and suppliers? NO If so, what are the likely impacts in terms of greenhouse gas emissions, operating costs and road safety?	The subject lands have existing traffic attractors relating to the primary production and other uses of the land.	The proposal does not involve an increase in traffic as additional housing entitlements are not proposed.	It is considered that the planning proposal may be benefit/cost neutral for this criteria.

Are there significant Government investments in infrastructure or services in the area whose patronage will be affected by the proposal? NO If so, what is the expected impact?	There are no identified infrastructure facilities that meet this criterion.	NA	NA
Will the proposal impact on land that the Government has identified a need to protect (e.g. land with high biodiversity values) or have other environmental impacts? Is the land constrained by environmental factors? NO	The subject lands cover a wide area of rural land with a variety of environmental attributes and constraints.	The proposal does not involve an increase in dwelling houses on rural land. The proposal would provide greater flexibility for landholders to consider boundary adjustment options when managing their land which could result in improved environmental outcomes.	It is considered that the planning proposal may be benefit/cost neutral for this criteria.
Will the LEP be compatible or complementary with surrounding land uses? What is the impact on amenity in the location and wider community? Will the public domain improve? STATUS QUO	The subject lands are dominated by a range of agricultural enterprises. Generally dwellings are established on the holdings.	The proposal would provide greater flexibility for landholders to consider boundary adjustment options when managing their land and should not have impact on amenity of the location, wider community or public domain.	It is considered that the planning proposal may be benefit/cost neutral for this criterion.
Will the proposal increase choice and competition by increasing the number of retail and commercial premises operating in the area? STATUS QUO	The subject lands are dominated by a range of agricultural enterprises.	The proposal would have no significant impacts on commercial activity on the subject lands.	It is considered that the planning proposal may be benefit/cost neutral for this criteria.
If a stand-alone proposal and not a centre, does the proposal have the potential to develop into a centre in the future? NA	The subject lands cover a wide area of rural land. As such it is considered that this criterion is not applicable.	NA	NA

What are the public interest reasons for preparing the draft plan? What are the implications of not proceeding at that time?	The broad application of the lot size and rural subdivision provisions promotes the aim of protecting valuable agricultural land by reducing the opportunity for fragmentation of holdings. However, inflexibility has resulted where Council cannot consider the merits of boundary adjustment applications in a range of circumstances.	The proposed amendments would facilitate the opportunity for landowners and Council to consider the merits of boundary adjustment options to effect positive land management outcomes without undermining the intent and objectives of the <i>Tamworth RDS 2008 and TRLEP 2010</i> .	Implementing the proposed amendments in the short term will provide options for rural landholders to consider rural boundary adjustment in certain circumstances that are not currently provided for. It is in the community interest in terms of economic activity and strengthening rural communities & centres in the future. A delay in implementing the amendments continues to restrict rural landholders options to pursue the best land management outcomes for the subject lands. A community benefit is identified for this criterion.
NET COMMUNITY BENEFIT = 3 of the 10 applicable criteria above identify a clear community benefit. 6 of the 10 applicable criteria are assessed as being potentially benefit/cost neutral. 0 or the 10 applicable criteria identify a significant cost to the community. Overall, a notable net community benefit is identified in relation to this planning proposal.			

**ATTACHMENT 2: CONSIDERATION OF STATE ENVIRONMENTAL PLANNING POLICIES (SEPPS)
RURAL BOUNDARY ADJUSTMENT PLANNING PROPOSAL**

SEPP	Applicable to TRC	Consistent / Not inconsistent	Reason for inconsistency or comment
No. 1 Development Standards	No	NA	SEPP1 does not apply to the Local Government Area (LGA) as per Cl.1.9 of the <i>TRLEP 2010</i> .
No. 4 Development Without Consent and Miscellaneous Exempt and Complying Development	Yes (N/A Cl.6 & parts 3&4)	Yes	SEPP 4 provisions are additional to those in <i>TRLEP 2010</i> .
No. 6 Number of Storeys in a Building	Yes	NA	Height of buildings (Cl.4.3) not adopted in <i>TRLEP 2010</i> .
No. 15 Rural Land-sharing Communities	Yes	Yes	It is not proposed to alter zoning provisions. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 21 Caravan Parks	Yes	Yes	It is not proposed to alter zoning provisions. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 22 Shops and Commercial Premises	Yes	Yes	It is not proposed to alter zoning provisions. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 30 Intensive Agriculture	Yes	Yes	It is not proposed to alter zoning provisions. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 32 Urban Land Consolidation (Redevelopment of Urban Land)	Yes	NA	The planning proposal does affect urban land.
No. 33 Hazardous and Offensive Development	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 36 Manufactured Home Estates	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 44 Koala Habitat Protection	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .

No. 50 Canal Estate Development	Yes	NA	Not applicable to the subject land.
No. 55 Remediation of Land	Yes	Yes	It is not proposed to alter zoning provisions. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 62 Sustainable Aquaculture	Yes	Yes	It is not proposed to alter zoning provisions. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 64 Advertising and Signage	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
No. 65 Design Quality of Residential Flat Development	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Housing for Seniors or People with a Disability 2004	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Building Sustainability Index: BASIX 2004	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Major Development 2005	Yes	NA	The planning proposal does not affect major development sites. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Mining, Petroleum Production and Extractive Industries 2007	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Temporary Structures 2007	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Infrastructure 2007	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Rural Lands 2008	Yes	Yes	The planning proposal is aligned with the rural planning principles specified in Part 2 of the SEPP. It is not proposed to alter zoning provisions. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Exempt and Complying Development Codes 2008	Yes	Yes	The proposal is designed to work in combination with the SEPP. The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .
Affordable Rental Housing 2009	Yes	Yes	The provisions of the SEPP are additional to those in <i>TRLEP 2010</i> .

**ATTACHMENT 3: CONSIDERATION OF SECTION 117 MINISTERIAL DIRECTIONS -
ASSESSMENT RELATIVE TO THE RURAL BOUNDARY ADJUSTMENT PLANNING PROPOSAL**

1. Employment and Resources

Direction	Applicable to TRC	Consistent	Reason for inconsistency or comment
1.1 Business and Industrial Zones	Yes	Not applicable	The planning proposal does not affect Business or Industrial zones.
1.2 Rural Zones	Cl.2(a) Yes Cl.2(b) No	Yes	It is not proposed to amend the zoning of any land currently affected by a rural zone or provide for an increase in land density.
1.3 Mining, Petroleum Production and Extractive Industries	Yes	Yes	The planning proposal does not propose a change of zoning that would affect the permissibility of mining on the subject lands. The SEPP (mining, petroleum production and extractive industries) prevails over the <i>TRLEP 2010</i> .
1.4 Oyster Aquaculture	No	Not applicable	Not affecting the LGA.
1.5 Rural Lands	Yes	Yes	The planning proposal is consistent with the rural planning principles specified in Part 2 of the Rural Lands SEPP. It is not proposed to alter zoning provisions. Cl.3(b) is not applicable as it is not proposed to amend the existing minimum lot size of the subject lands.

2. Environment and Heritage

Direction	Applicable	Consistent	Reason for inconsistency or comment
2.1 Environment Protection Zones	Yes	Yes	The proposal does not include any elements that would reduce environmental protection standards applying to the subject lands.
2.2 Coastal Protection	No	Not applicable	Not affecting the LGA
2.3 Heritage Conservation	Yes	No	The <i>TRLEP 2010</i> contains provisions that facilitate the conservation of heritage conservation elements. Aboriginal objects or places are protected under the National Parks and Wildlife Act 1974. No study has been undertaken to identify specific objects within the Region. It is considered that the planning proposal is justifiably inconsistent with the Direction.
2.4 Recreation Vehicle Areas	Yes	Yes	It is not proposed amend the zoning of the subject lands. The permissibility of the land-use is not increased or affected by the planning proposal.

3. Housing, Infrastructure and Urban Development

Direction	Applicable	Consistent	Reason for inconsistency or comment
3.1 Residential Zones	Yes	Not applicable	The proposal does not affect residential zoned land.
3.2 Caravan Parks and Manufactured Home Estates	Yes	Yes	It is not proposed to alter zoning provisions. The provisions of the SEPP No.36 (Manufactured Home Estates) prevail over the <i>TRLEP 2010</i> .
3.3 Home Occupations	Yes	Yes	The land-use continues to be permissible without consent where dwelling houses are permitted.
3.4 Integrating Land Use and Transport	Yes	Yes	It is not proposed to alter zoning provisions.
3.5 Development Near Licensed Aerodromes	Yes	Yes	There is no proposed rezoning or amendment of lot size provisions and the planning proposal aims only to provide flexibility for rural boundary adjustments between existing lots. While the proposal technically alters a provision that applies to land in the vicinity of a licensed aerodrome it is considered that the planning proposal is consistent with the Direction.
3.6 Shooting Ranges	Yes	Yes	There is no proposed rezoning or amendment of lot size provisions and the planning proposal aims only to provide flexibility for rural boundary adjustments between existing lots. While the proposal technically alters a provision that applies to land in the vicinity of shooting ranges it is considered that the planning proposal is consistent with the Direction.

4. Hazard and Risk

Direction	Applicable	Consistent	Reason for inconsistency or comment
4.1 Acid Sulfate Soils	No	Not applicable	Not affecting LGA
4.2 Mine Subsidence and Unstable Land	No	Not applicable	Not affecting LGA
4.3 Flood Prone Land	Yes	Yes	There is no proposed rezoning or amendment of lot size provisions and the planning proposal aims only to provide flexibility for rural boundary adjustments between existing lots. While the proposal technically alters a provision that applies to flood prone land it is considered that the planning proposal is consistent with the SEPP. Issues relating to flood planning are a matter for consideration via the development assessment process and are guided by the provisions of the <i>TRLEP 2010</i> and the <i>TRDCP 2010</i> .

4.4 Planning for Bushfire Protection	Yes	Yes	There is no proposed rezoning or amendment of lot size provisions and the planning proposal aims only to provide flexibility for rural boundary adjustments between existing lots. While the proposal technically alters a provision that applies to bushfire prone land it is considered that the planning proposal is consistent with the Direction. Bushfire protection issues are a matter for consideration via the development assessment process and are guided by the provisions of the <i>TRLEP 2010</i> and the <i>TRDCP 2010</i> .
5. Regional Planning			
Direction	Applicable	Consistent	Reason for inconsistency or comment
5.1 Implementation of Regional Strategies	No	Not applicable	Not affecting LGA
5.2 Sydney Drinking Water Catchments	No	Not applicable	Not affecting LGA
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	No	Not applicable	Not affecting LGA
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	No	Not applicable	Not affecting LGA
5.8 Second Sydney Airport: Badgerys Creek	No	Not applicable	Not affecting LGA
6. Local Plan Making			
Direction	Applicable	Consistent	Reason for inconsistency or comment
6.1 Approval and Referral Requirements	Yes	Yes	The planning proposal does not entail provisions which increase approval and referral requirements as outlined in the Direction.
6.2 Reserving Land for Public Purposes	Yes	Yes	The planning proposal does not entail provisions which affect the reservation of land for public purposes.
6.3 Site Specific Provisions	Yes	Yes	The planning proposal is not prepared on the basis of allowing a particular development to be carried out.
7. Metropolitan Planning			
Direction	Applicable	Consistent	Reason for inconsistency or comment
7.1 Implementation of the Metropolitan Strategy	No	Not applicable	Not affecting LGA