

Subdivision of Rural Land Severed by a Sealed Road

Proposal Title : **Subdivision of Rural Land Severed by a Sealed Road**

Proposal Summary : **The proposal seeks to include provisions into Nambucca LEP 2010 to permit the subdivision of land zoned RU1 Primary or RU2 Rural Landscape, severed by a sealed road, and identified on the 'Severed Land Application Map'.**

PP Number : **PP_2015_NAMBU_002_00** Dop File No : **15/09740**

Proposal Details

Date Planning Proposal Received : **24-Jun-2015** LGA covered : **Nambucca**

Region : **Northern** RPA : **Nambucca Shire Council**

State Electorate : **OXLEY** Section of the Act : **55 - Planning Proposal**

LEP Type : **Policy**

Location Details

Street :
Suburb : City : Postcode :
Land Parcel : **Various land parcels zoned RU1 Primary Production or RU2 Rural Landscape and shown on the map accompanying the planning proposal**

DoP Planning Officer Contact Details

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RPA Contact Details

Contact Name : **Grant Nelson**
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DoP Project Manager Contact Details

Contact Name :
Contact Number :
Contact Email :

Land Release Data

Growth Centre : **N/A** Release Area Name : **N/A**
Regional / Sub Regional Strategy : **Mid North Coast Regional Strategy** Consistent with Strategy : **No**

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MDP Number :		Date of Release :	
Area of Release (Ha) :	0.00	Type of Release (eg Residential / Employment land) :	N/A
No. of Lots :	0	No. of Dwellings (where relevant) :	22
Gross Floor Area :	0	No of Jobs Created :	0

The NSW Government Lobbyists Code of Conduct has been complied with : **Yes**

If No, comment : **The Department of Planning and Environment's Code of Practice in relation to communications and meetings with lobbyists has been complied with to the best of the Region's knowledge. The Northern Region has not met with any lobbyists in relation to this proposal, nor has the Northern Region been advised of any meeting between other Departmental Officers and lobbyists concerning the proposal.**

Have there been meetings or communications with registered lobbyists? : **No**

If Yes, comment :

Supporting notes

Internal Supporting Notes : **Advice was sought from the Department's Hunter, Southern and Western Regions with regard to whether any similar road severance subdivision provisions have already been proposed or implemented. No similar provisions were identified.**

External Supporting Notes :

Adequacy Assessment

Statement of the objectives - s55(2)(a)

Is a statement of the objectives provided? **Yes**

Comment : **The planning proposal adequately describes its intent to permit the subdivision of rural lots that are severed by a public road. If the proposal is supported, it is recommended that prior to public exhibition that the objectives be further clarified to confirm that the provisions will only apply to certain areas of the LGA in close proximity to Nambucca, Macksville, Bowraville and Scotts Head (and not areas such as Taylors Arm, Yarranbella, Utungun, Missabotti and South Arm as discussed elsewhere in the proposal).**

It is also noted that the intent of the proposal and the accompanying Council report is to permit the erection of a rural dwelling on vacant lots that result from the proposed subdivision provisions. This would not be possible under the current provisions of Nambucca LEP 2010 Clause 4.2A Erection of Dwelling Houses and Dual Occupancies (Attached) on land in certain rural and environmental protection zones. Clause 4.2A permits the erection of dwelling houses in the RU1 and RU2 Zones only if the:

- lot complies with the minimum lot size map; or**
- lot was created before the Plan commenced and a dwelling was permissible before that commencement; or**
- lot was created from a subdivision granted prior to the Plan commencing and a dwelling was permissible if the plan of subdivision had been registered before that commencement; or**
- lot is an existing holding.**

If the proposal is supported, it is recommended that Council be required to consider this matter prior to public exhibition.

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Explanation of provisions provided - s55(2)(b)

Is an explanation of provisions provided? **Yes**

Comment : The proposal adequately describes the proposed subdivision provisions, but does not explain that it will apply only to certain areas of the LGA or address the issue of dwelling permissibility on resulting vacant lots. It is also noted that the draft clause included in Appendix 1 of the proposal limits application of the clause to lots that have a dwelling. The proposal and the accompanying Council report however state the intent is to permit the subdivision of lots that are vacant but have a 'dwelling entitlement'.

If the proposal is supported, it is recommended that Council be required to consider these matters prior to public exhibition.

Justification - s55 (2)(c)

a) Has Council's strategy been agreed to by the Director General? **Yes**

b) S.117 directions identified by RPA : **1.2 Rural Zones**

* May need the Director General's agreement

Is the Director General's agreement required? **Yes**

c) Consistent with Standard Instrument (LEPs) Order 2006 : **Yes**

d) Which SEPPs have the RPA identified? **SEPP (Rural Lands) 2008**

e) List any other matters that need to be considered : **The Mid North Coast Regional Strategy, the Settlement Planning Guidelines: Mid and Far North Coast Regional Strategies (2007) and the Department approved Nambucca Rural Residential Land Release Strategy 2009 are also applicable to the proposal.**

Have inconsistencies with items a), b) and d) being adequately justified? **No**

If No, explain : **The inconsistencies of the proposal with certain SEPPs, s117 Directions, the Mid North Coast Regional Strategy, the Settlement Planning Guidelines: Mid and Far North Coast Regional Strategies (2007) and the Department approved Nambucca Rural Residential Land Release Strategy 2009 are not considered to be adequately justified. Refer to discussion below.**

Mapping Provided - s55(2)(d)

Is mapping provided? **Yes**

Comment : The planning proposal includes a map which identifies lots severed by sealed roads across the LGA. The planning proposal states however that the provisions will be limited to lots within a certain proximity to Nambucca, Macksville, Bowraville and Scotts Head. The provided map is considered likely to cause confusion as to where the provisions will apply. It should be amended prior to public exhibition to show only the lots affected by the proposal if it is supported.

Community consultation - s55(2)(e)

Has community consultation been proposed? **Yes**

Comment : **The RPA has identified a 14 day exhibition period for the proposal.**

As the proposal is considered to be inconsistent with certain SEPPs, s117 Directions, the Mid North Coast Regional Strategy, the Settlement Planning Guidelines: Mid and Far North Coast Regional Strategies (2007) and the Department approved Nambucca Rural Residential Land Release Strategy 2009, it is considered more appropriate if the proposal is supported, that a 28 day notification period be undertaken to allow the community an adequate opportunity to review the proposal.

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Additional Director General's requirements

Are there any additional Director General's requirements? **No**

If Yes, reasons :

Overall adequacy of the proposal

Does the proposal meet the adequacy criteria? **Yes**

If No, comment :

The Planning Proposal and accompanying documentation are considered to satisfy the adequacy criteria by:

1. Providing appropriate objectives and intended outcomes;
2. Providing a suitable explanation of the provisions proposed by the LEP to achieve the outcomes;
3. Providing an adequate justification for the proposal;
4. Outlining a proposed community consultation program; and
5. Providing a project time line.

The submitted proposal does not provide details on mapping as required by the Department's A Guide to Preparing Planning Proposals and includes the project time line in a separate document. If supported, the proposal should be amended prior to public exhibition to address these matters.

Council has sought an authorisation to exercise its plan making delegations for this proposal. If supported, it is considered likely that drafting of the currently proposed clause (Appendix 1 of the proposal) will be complex and could raise a number of legal issues associated with the subjective nature of certain criteria. As the proposal is also considered to be contrary to a number of policy directions, action will need to be taken to assess and resolve these inconsistencies. It is therefore recommended that an authorisation to exercise its plan making delegations not be issued to Council in regard to this matter.

The RPA has provided a project time line which estimates that Council will be ready to seek a Parliamentary Counsel Opinion for this matter in November 2015. If supported, to ensure an adequate period for finalisation, a 9 month time frame for completion of the proposal is recommended. If an authorisation to exercise delegation is issued to Council, the project time line will also need to be updated prior to public exhibition to include the additional delegated tasks.

Proposal Assessment

Principal LEP:

Due Date :

Comments in relation to Principal LEP :

Nambucca LEP 2010 was notified in July 2010.

Assessment Criteria

Need for planning proposal :

The proposal is not the result of any strategic study or report.

Council has prepared the proposal due to landowner concerns regarding access and management of lots split by a rural road. These concerns include:

- rural activities are difficult to manage in a safe manner when access is required between land on opposing sides of a road;
- the value of the severed land for rural purposes is minimal due to size and management constraints;
- poor management of severed land can result in environmental issues such as erosion and weeds; and

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- in many areas the severed land may be a logical extension to a nearby rural residential area.

The proposal has been prepared to address these concerns and undertake the required amendments to Nambucca LEP 2010. The proposal aims to permit the subdivision of land zoned RU1 Primary or RU2 Rural Landscape, severed by a sealed road, and identified on a 'Severed Land Application Map'.

While a total of 103 severed road lots have been identified by Council across the LGA, it is currently intended to limit the proposed provisions to 22 lots in proximity to Macksville, Bowraville, Nambucca and Scotts Head.

The subdivision provisions proposed by Council will permit the 22 lots to be subdivided only if:

- the lot is severed by an existing sealed public road;
- the existing lot has a dwelling entitlement;
- the proposed lot boundaries use the road as the boundary;
- the resulting lots are greater than 1ha in size; and
- the resulting lots have a suitable area available for future dwellings and access, and access that is at or above the flood planning level for the land.

The subdivision provisions will also include a number of matters for consideration including existing and approved land uses in the vicinity, the potential impacts on the preferred and predominant land uses in the area, natural and physical constraints, potential land use conflict issues and the potential impacts on the environmental values or agricultural viability of the land.

When Nambucca Shire Council sought advice on this proposal in late 2014, the Department's Northern Region advised (letter attached):

- the road severance provisions have the potential to increase the proliferation of dwellings in rural areas;
- Council's Rural Residential Strategy and LEP already provide an estimated 28 years of zoned rural residential land supply;
- secondary dwellings are permissible in the RU1 and RU2 Zones under Nambucca LEP 2010;
- it is considered that adequate opportunity for dwellings in rural areas already exists in Nambucca LGA;
- opportunities exist under clauses 4.1C and 4.2 of Nambucca LEP 2010 to undertake boundary adjustments or primary production subdivisions that could be used to address the landowner management concerns regarding severed lots;
- should Council wish to pursue this matter, an amendment to its local rural residential strategy would be required in the first instance to enable a more thorough analysis and justification of the lots which may be subjected to the provisions and to enable their inclusion in the broader rural residential release program for the LGA.

Council was advised that this analysis would require:

1. justification in relation to the SEPP (Rural Lands) and s117 Direction 1.5 Rural Land;
 2. limiting its application to land adjoining existing rural residential areas or in close proximity to towns;
 3. an assessment of traffic volumes of the roads should be conducted to determine the level of traffic movements which makes the management of the land unworkable;
 4. whether the land is cleared of significant native vegetation or whether further extensive clearing will be required to accommodate a dwelling;
 5. consideration of existing land uses on neighbouring land which may be incompatible with future rural residential development; and
- If the amendment to the strategy is approved, Council may then either rezone the land and change the minimum lot size, or include the land on a map to which the severed land provisions would apply.

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Council has chosen to prepare the current proposal without undertaking the recommended amendment to its rural residential strategy or conducting the suggested strategic analysis in relation to traffic volumes, native vegetation clearing or adjoining land uses. It is understood that only lots that are fully or substantially flood prone have been excluded. Council considers this proposal to be a minor stand alone provision that could be dealt with separately to its rural residential strategy.

It is noted however that Council staff in the accompanying Council report recommended not addressing this matter through an amendment to its rural residential strategy. Council staff highlighted that such an amendment would require significant resources from Council including staff time and finances, and that other landholders who had been excluded from the rural residential release rezonings in 2010 may find the new provisions concerning as it could detract further from their perceived future right to subdivide. These reasons are considered to be inadequate and inappropriate for not undertaking the recommended analysis and Strategy amendment to justify the need for the provisions.

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Consistency with strategic planning framework :

The principle of permitting ad hoc and scattered rural subdivision and dwellings on the basis of a potential physical constraint (such as the location of a sealed road) without a detailed strategic analysis of its implications and merits is considered to be inconsistent with the existing planning framework.

Such a principle if adopted (and potentially extended once accepted to allow subdivision in more remote locations, wherever rural properties are severed by watercourses and other physical obstacles, or when landowners are not capable of adequately managing their land) would have significant State wide precedence and adverse implications for the future development of rural lands, the protection of primary production lands and the wider agricultural sector, and minimising rural land use conflict.

Council has justified the need for the proposal based primarily on potential difficulties associated with the managing of rural land severed by a sealed road. Many rural properties however across NSW have and continue to operate efficient and well managed agricultural holdings when severed by roads and other physical obstacles. While it is acknowledged that lot severance by extremely high volume traffic roads that have physical barriers that prevent landowners from crossing at certain locations (such as sections of the Pacific Highway) can increase the difficulty for owners managing their land, no detail regarding the traffic volumes or physical barriers associated with the roads to which the proposed subdivision provisions are to be applied has been provided justifying the difficulties or the need in this situation.

It is also noted that the Nambucca LGA has ample existing opportunities for rural /rural residential housing supply as discussed previously, and that the proposed provisions are not needed to address rural housing supply issues. Opportunities also already exist within the existing subdivision provisions of Nambucca LEP 2010 for the creation of primary production lots and rural boundary adjustments to allow owners to dispose of the land if they having difficulties in managing their holding (while allowing the land to be retained for agricultural production). Explanation and justification why these existing subdivision opportunities do not provide opportunities for owners to address land management issues for road severed lots has also not been addressed by Council, particularly in relation to the negative outcomes associated with the loss of agricultural lands, increased and scattered rural housing and increased land use conflict for the surrounding agricultural industry.

In relation to the existing planning framework, it is considered that the proposal is inconsistent with the following matters:

MID NORTH COAST REGIONAL STRATEGY

The Mid North Coast Regional Strategy requires that LEPs protect the Region's environmental and natural resource assets by including provisions to limit dwellings in rural zones, include minimum subdivision standards for rural zones, retention of regionally significant farmland in agricultural production and that no new rural residential development be permitted (particularly in the Coastal Area east of the Pacific Highway) unless it is in accordance with an approved local growth management strategy.

The proposed road severance provisions are considered to be inconsistent with the Strategy as they will not help protect the Region's environmental and natural resource assets. The provisions will in fact increase the number of dwellings in rural zones, provide an exception to the adopted minimum lot subdivision standards, alienate regionally significant farmland by allowing it to be used for rural residential development and will create ad hoc and scattered rural residential development outside the scope of Council's Director General approved rural residential strategy in the absence of any strategic assessment of the physical constraints of the land. It is considered that insufficient assessment of these matters has been undertaken to justify the significant inconsistencies.

SETTLEMENT PLANNING GUIDELINES: Mid and Far North Coast Regional Strategies

The Settlement Planning Guidelines were developed to assist councils in preparing local

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growth management strategies that achieve the planning outcomes required under the Regional Strategies. These guidelines specifically recommend that:

- future rural residential development should be clustered to encourage a sense of community and the efficient provision of services;
- fragmented development over the landscape will not be permitted;
- future rural residential development should be planned to minimise land use conflict;
- future development should avoid areas of environmental significance, significant natural and / or economic resource, potential hazard, high landscape or cultural heritage value, or potential increased risk associated with impacts of climate change; and
- future development should not contribute to ribbon development along major or arterial roads that could impact on safety and efficiency.

The proposed road severance provisions are inconsistent with these guidelines as they will promote scattered and unplanned rural residential development along sealed roads that will be difficult to service efficiently. No assessment of potential land use conflict impacts or the environmental significance or the physical constraints affecting the land has been undertaken. It is proposed that these matters will not be considered until the development application stage. It is considered that insufficient assessment of these matters has been undertaken to justify the significant inconsistencies.

NAMBUCCA RURAL RESIDENTIAL RELEASE STRATEGY 2009 (As Amended)

The Nambucca Rural Residential Strategy (as amended) was adopted by Council and approved by the Director General in 2009. The Strategy was specifically prepared to replace the former unplanned 5 year 'quota' release provisions that had existed in Nambucca LEP 1995 and to inform the preparation of Nambucca LEP 2010. The aim of the Strategy was to adopt 'a more strategic and sustainable approach to rural residential housing' compared to the former unplanned approach while 'maximising the benefits of lifestyle options derived from residential housing while minimising the economic, social and environmental costs' that can occur.

The strategy adopted a clustered / ring approach around key centres and areas combined with performance based controls to strategically direct rural residential development to preferred areas. The strategy highlighted that this approach would help avoid fragmented settlement patterns with higher servicing costs that can also impact negatively upon agricultural enterprises and environmental values. The Strategy identified short, medium and long term rural residential release areas, with the short term areas rezoned under Nambucca LEP 2010 and providing an estimated 28 years of land supply. The Strategy also did not include areas around Bowraville or Scotts Head in the short term release areas 'based largely on the limited services available in these areas'.

The proposed road severance provisions are inconsistent with the Strategy as it returns to the former unplanned approach and adopts an ad hoc and scattered delivery of rural residential development (including around centres such as Bowraville and Scotts Head that have been identified as not being suitable at present due to limited services) that are likely to have all the negative impacts that the Strategy identified could occur from such development. It is considered that insufficient assessment of these matters has been undertaken to justify the significant inconsistencies.

SEPP (RURAL LANDS) 2008

While the rural planning principles and the rural subdivision principles contained within the SEPP acknowledge the importance of rural and rural residential housing, they also emphasise:

- the importance of rural lands and agriculture;
- the promotion and protection of opportunities for current and potential productive and sustainable economic activities in rural areas;
- minimisation of rural land fragmentation and rural land use conflicts;
- need to consider servicing and appropriate locations for rural housing; and
- need to consider the natural and physical constraints and opportunities of land.

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The proposed road severance provisions are considered to be inconsistent with the SEPP and these principles as it promotes rural land fragmentation and potential land use conflict and does not protect agricultural lands or assess the physical constraints of the land (these matters are deferred for consideration until the development application stage). It is considered that insufficient assessment of these matters has been undertaken to justify the significant inconsistencies.

SECTION 117 DIRECTIONS

The proposal is considered to be inconsistent with the following s117 Directions:

- 1.2 Rural Zones

Increases the permissible density of land in a rural zone.

- 1.5 Rural Lands

Inconsistent with the rural planning principles and the rural subdivision principles contained within the SEPP (Rural Lands) 2008.

- 4.1 Acid Sulfate Soils

Applies to land containing acid sulphate soils and an acid sulphate soils study has not been prepared.

- 4.3 Flood Prone Land

May permit an increase in development on flood prone land.

- 4.4 Planning for Bushfire Protection

Applies to land identified as being bushfire prone and does not include the required development provisions contained in the Direction.

- 5.1 Implementation of Regional Strategies

Proposal is inconsistent with the Mid North Coast Regional Strategy as discussed above.

While the inconsistencies with 4.1 Acid Sulfate Soils, 4.3 Flood Prone Land and 4.4 Planning for Bushfire Protection could likely be resolved in accordance with the relevant provisions, the inconsistencies with 1.2 Rural Zones, 1.5 Rural Lands and 5.1 Implementation of Regional Strategies are not considered to be justified. The road severance provisions are inconsistent with these Directions in that they promote and increase fragmented and scattered rural housing, that is inefficient and difficult to service, and has the potential to increase land use conflict with surrounding agricultural uses without any strategic analysis justifying the need.

Environmental social
economic impacts :

The proposal will have some positive economic benefits to owners due to the windfall profit in land value that would occur by permitting the subdivision and erection of dwelling. In addition the perceived road safety issue generated by the need to manage land on either side of a busy road could be resolved.

However these considerations are significantly outweighed by a number of potential adverse environmental, social and economic impacts that may have State wide precedence if supported. These impacts include:

- increased potential native vegetation clearing and associated biodiversity impacts; and
- adverse economic and social impacts due to increased rural land fragmentation and the likely restriction on surrounding agricultural land uses due to land use conflicts.

A strategic assessment of these impacts and the affected lands has not been undertaken to support the proposal. The proposal defers any consideration of these issues until the development application stage. This is not considered appropriate.

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Assessment Process

Proposal type : **Inconsistent**

Community Consultation
Period : **Nil**

Timeframe to make
LEP : **0 months**

Delegation : **DDG**

Public Authority
Consultation - 56(2)
(d) : **Office of Environment and Heritage
NSW Department of Primary Industries - Agriculture
NSW Rural Fire Service
Transport for NSW - Roads and Maritime Services**

Is Public Hearing by the PAC required? **No**

(2)(a) Should the matter proceed ? **Yes**

If no, provide reasons : **If the proposal is supported, it is considered that consultation should be undertaken with the identified agencies.**

Resubmission - s56(2)(b) : **No**

If Yes, reasons :

Identify any additional studies, if required. :

If Other, provide reasons :

Council should be advised that the Department would need to undertake a review of the State wide implications of such a policy before it can be determined whether a similar proposal could be supported in the future. In this regard it is noted that there to be no other similar provisions in planning instruments elsewhere in the State.

If the outcome of this review supports such a policy, Council could then implement it through a coordinated rural residential release program that is in accordance with an amended Rural Residential Land Release Strategy that is approved by the Secretary and that considers:

- 1. its justification in relation to the Mid North Coast Regional Strategy, the Settlement Planning Guidelines : Mid and Far North Coast Regional Strategies, the SEPP (Rural Lands) and s117 Directions 1.2 Rural Zones and 1.5 Rural Land;**
- 2. an assessment of traffic volumes and physical barriers on the subject roads to confirm that the management of the land is unworkable and separation necessary;**
- 3. the physical constraints of the land confirming that the land is suitable for future subdivision and additional rural dwellings;**
- 4. the presence of existing land uses on neighbouring lands which may be incompatible with the future rural residential development; and**
- 5. whether the location of the land is in suitable proximity to appropriate centres or existing rural residential areas and that adequate and efficient services can be made available.**

Identify any internal consultations, if required :

No internal consultation required

Is the provision and funding of state infrastructure relevant to this plan? **No**

If Yes, reasons :

Documents

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Document File Name	DocumentType Name	Is Public
Nambucca Shire Council_LEP 2010 Amendment - Subdivision of Rural Land Severed by a Sealed Road - Council letter_.pdf	Proposal Covering Letter	Yes
Planning Proposal.pdf	Proposal	Yes
Project Time Line.pdf	Proposal	Yes
Council Report and Resolution.pdf	Proposal	Yes
Department Letter to Council.pdf	Proposal	Yes
Map - Rural Lots severed by sealed Road.pdf	Map	Yes

Planning Team Recommendation

Preparation of the planning proposal supported at this stage : **Not Recommended**

S.117 directions: **1.2 Rural Zones**

Additional Information : **It is recommended that:**

(a) the proposal not be supported as it does not sufficiently demonstrate the need or justification for the proposed provisions or its inconsistencies with the SEPP (Rural Lands) 2008, s117 Directions 1.2 Rural Zones, 1.5 Rural Lands, 5.1 Implementation of Regional Strategies and the Mid North Coast Regional Strategy and associated planning settlement guidelines; and

(b) Council be advised that the Department would need to undertake a review of the State wide implications of such a policy before it can be determined whether a similar proposal could be supported in the future.

Supporting Reasons : The principle of permitting ad hoc and scattered rural subdivision and dwellings on the basis of a potential physical constraint (such as the location of a sealed road) without a detailed strategic analysis of its need, implications or merits is not supported. Such a principle if supported would have State wide precedence and implications for the future management of rural lands and the wider agricultural sector.

The presence of a potential physical constraint is not considered sufficient in the absence of any strategic assessment to justify the need to fragment rural land, increase the number of scattered and difficult to service rural dwellings, increase potential land use conflict and put at risk the undertaking of routine agricultural activities on the surrounding lands. These outcomes would have significant implications if adopted across the State for the NSW agricultural sector and would jeopardise agricultural activities that produced agricultural commodities valued at over \$10.8 billion in 2011/12 for the NSW economy.

It is also noted that a number of existing agricultural holdings across NSW are being conducted successfully and efficiently even when affected by such a physical constraint. It is considered preferable that the Department undertake a review of the State wide implications of such a policy to determine whether it would support a similar proposal in the future prior to Council committing further resources to this issue. If the outcome of the review was to support such a policy, Council could then undertake a strategic assessment to identify and justify the sites that are physically suitable and warrant subdivision and that could be incorporated into Council's rural residential strategy and release program.

Signature:



Printed Name:

Jim Clark
Team Leader Local Planning

Date:

26 June 2015

