



PLANNING PROPOSAL

AMENDMENT TO THE INVERELL LEP 2012

Cnr Gwydir Highway & Jardine Road, Inverell

August 2020

Ref: 19037

**Planning Proposal
Amend Inverell LEP 2012 with respect to 60 Jardine Road INVERELL**

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1 Introduction

This Planning Proposal has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* and the *Guide to Preparing Planning Proposals* (August 2016) which details the information required to be provided as part of a Planning Proposal application.

This Planning Proposal seeks to explain the intended effect of, and justification for the proposed amendment to the Inverell Local Environmental Plan 2012 (ILEP 2012) to rezone part Lot 1 DP 825894, 60 Jardine Road, Inverell (the subject land) from the **RU1 Primary Production** and the **R1 General Residential** zones to the **B5 Business Development zone**. Refer to **Figure 1** below for the location of the site and **figure 4** for the current zoning applying to the site.

The proposal also seeks an amendment to the ILEP 2012 minimum lot size map to facilitate development of the subject land for large format retail purposes so as to provide flexibility in the creation of title to accommodate permissible development. To achieve this intended outcome, it is proposed to alter the minimum Lot size map from a minimum lot size of 450m² to no minimum lot size consistent with the minimum lot size that currently applies to the adjoining B5 zoned land. The area subject to the rezoning (subject site/land) and amendment to the minimum lot size map is illustrated on **Figures 5**.

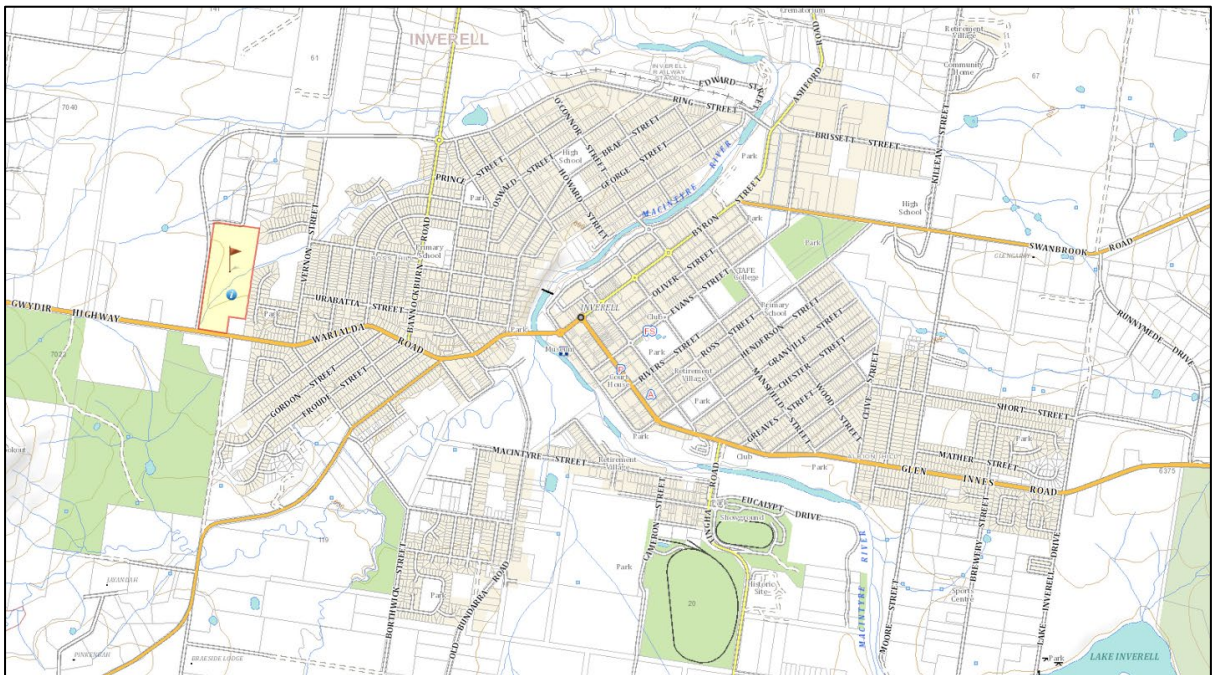


Figure 1: Location 60 Jardine Road Inverell

1.1 Summary of Planning Proposal

This Planning Proposal is being driven by a scheme for a new Bunnings store to service Inverell and the North West region of NSW. The land is located at the corner of the Gwydir Highway and Jardine Road at the western gateway to Inverell as illustrated at figure 1 above.

Bunnings is proposing to enhance its presence in Inverell, through relocation and expansion of its existing store, as part of its national network strategy. The existing Bunnings Inverell store has been a successful outlet, however, the store has aged (originally opened in around 1991) and is not consistent with modern consumer and operational expectations for a large-format hardware and home improvement retailer such as Bunnings.

The objective of this Planning Proposal is to facilitate the Bunnings development by extending the existing B5 Business Development zone over approximately 1.8ha of land currently zoned RU1 Primary Production and R1 General Residential at this location. This would result in:

- The rezoning of approximately 1.56 hectare of the subject land from the RU1 Primary Production zone to the B5 Business Development zone, and
- .23ha from the R1 General Residential zone to the B5 Business Development zone.

This Planning Proposal also seeks to remove the minimum lot size provisions applying to the land so there is also consistency with the minimum lot size provisions currently applying to the existing B5 Business Development zone land in this area.

This rezoning proposal is illustrated in **figure 2** below.

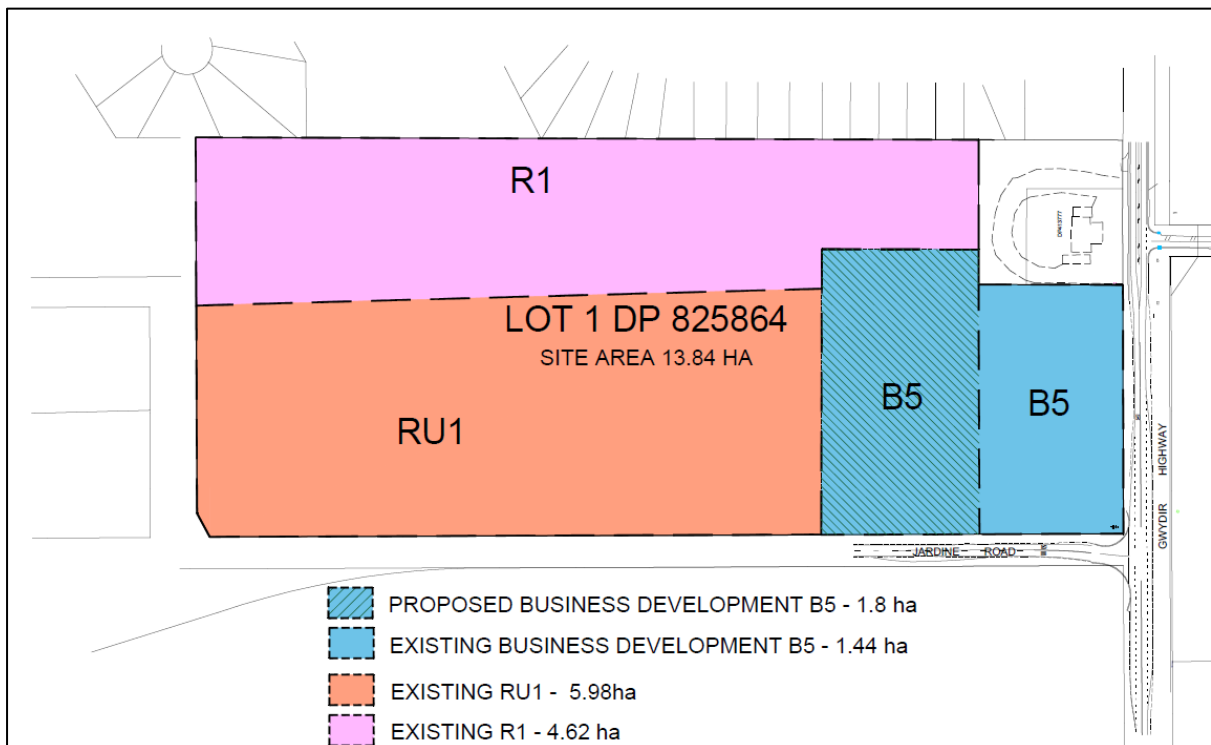


Figure 2: Existing and Proposed zoning framework of Lot 1 DP825894

Councils strategic planning framework and Local Environmental Plan support a Bunnings style development in this location with land already zoned B5 Business Development. However, during due diligence investigations a scarred tree of significance to aboriginal culture was discovered on the site, and the need to conserve this scarred tree and a surrounding curtilage reduced the available area for the Bunnings new store development. It was also determined that the site area available under the current B5 Business Development zone compromised the retail offering that was required to meet market demand (ie the area zoned B5 Business Development was not large enough to locate the desired floor area of the new Bunnings store). Additional land is also required for an on-site stormwater detention facility, and earthworks. Consequently, in order to then facilitate the development, the existing B5 zone needs to be extended as illustrated on figure 2 above.

Other alternative options have been explored for the location of the new Bunnings store with the results confirming that there is no other available or suitable land within Inverell where the store could be developed. A **Site Selection Audit** report accompanies the Planning Proposal detailing that investigation process. The Planning Proposal and resulting new Bunnings store (subject to DA approval) would result in not only an enhanced retail offering to the community and the construction industry, but also result in employment growth and help Inverell capture escape expenditure in the building supplies and hardware category.

As this Planning Proposal will explain, there will be no environmental impacts and there are no infrastructure constraints to site development. The Planning Proposal is a matter of minor significance given not only the relatively small area to which it applies, but also the proposal is to extend an existing zoning to facilitate a development which Councils strategic framework supports.

1.2 Site Description

The subject site is that part of Lot 1 DP 825894 (parent lot) that is proposed to be rezoned **B5 Business Development** and is illustrated on **figure 2 above**. The parent lot is located at 60 Jardine Road Inverell on the north eastern corner with Warialda Road (Gwydir Highway) at the western gateway to Inverell, and on its rural/urban interface. Thus, the surrounding properties adjoining the site are either zoned as Primary Production RU1 or General Residential R1.

That part of the lot the subject of this Planning Proposal is located on Jardine Road extending east towards the residential properties which front Mills Street. It has an area of some 1.8 hectares as illustrated on figure 2 and is zoned Ru1 Primary Production and R1 General Residential.

The parent lot is located opposite a nursery and adjacent to a service station on its eastern side, with a motel further to the east and other commercial and light industrial style uses. To the east of the subject site is a residential area (Mills Street).

An aerial photo of the parent lot and subject site are provided at **figure 3** below. The subject site consists of cleared grazed land including a mix of both invasive exotic and degraded native grasses, with seven mature *Eucalyptus albens* (White Box) trees with regeneration occurring under the mature trees.

From a geological perspective the site occurs within the Inverell Basalts where the landscape, as described by Mitchell (2002), is distinguished by undulating low hills of the New England Plateau on extensive basalt flows of a Tertiary lava field. Black structured loam and clay thickening downslope

to sticky black clay in drainage lines are high in nutrients. There is a first order ephemeral drainage line running through the western edge of the lot.

Located in the front south eastern section of the property, adjacent to the service station, is a scarred tree of aboriginal cultural significance that has been recorded on AHIMS (#11-6-0133). It has been recommended that a 17m curtilage around the scarred tree be fenced off and it be retained and conserved. The curtilage area is approximately 507m² and is illustrated on **Figure 7**.



Figure 3: Subject Land - Part Lot 1 DP825894, 60 Jardine Road, Inverell

Under the ILEP 2012, Lot 1 DP825894 is currently zoned:

- RU1 Primary Production – Approximately 7.54 hectares;
- R1 General Residential – Approximately 4.86 hectares; and
- B5 Business Development – Approximately 1.44 hectares.

Refer to **figure 4** below:

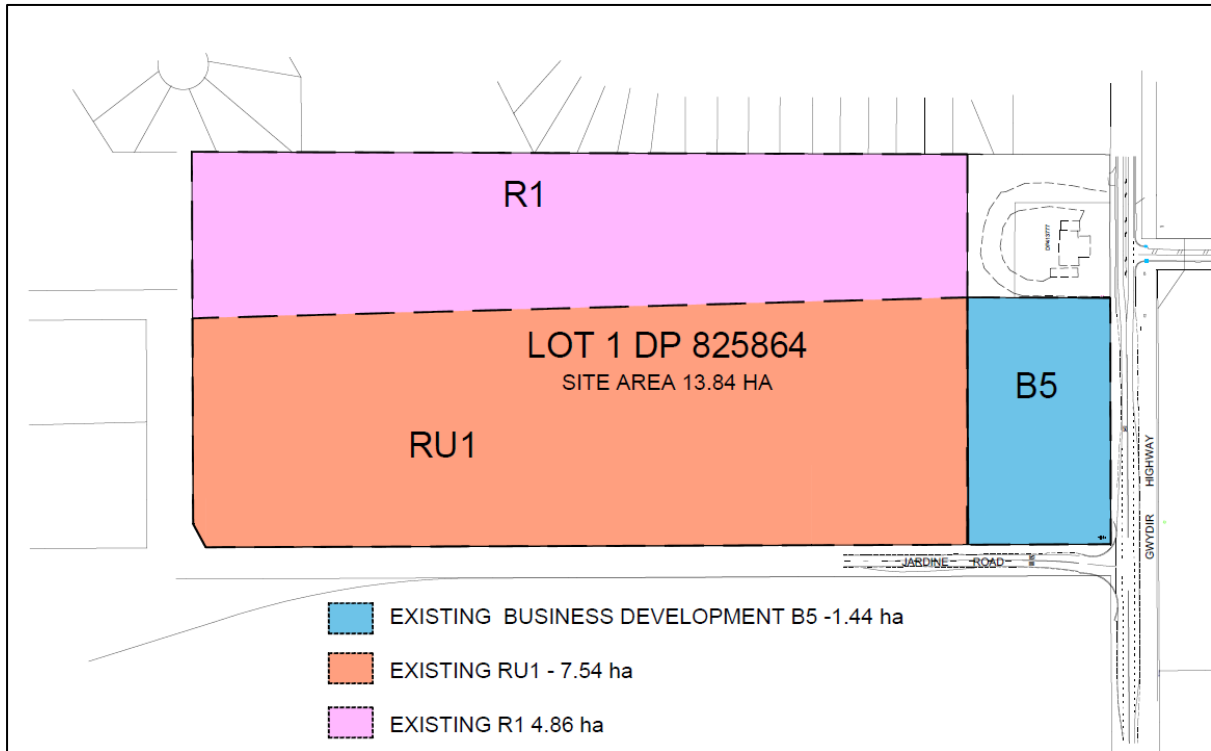


Figure 4: Current Zoning Structure

In relation to the minimum lot size provisions of the LEP the following provisions apply as illustrated on **figure 5** below:

- 450 square metres – the land zoned RU1 Primary Production and R1 General Residential; and
- No minimum lot size – the land zoned B5 Business Development.

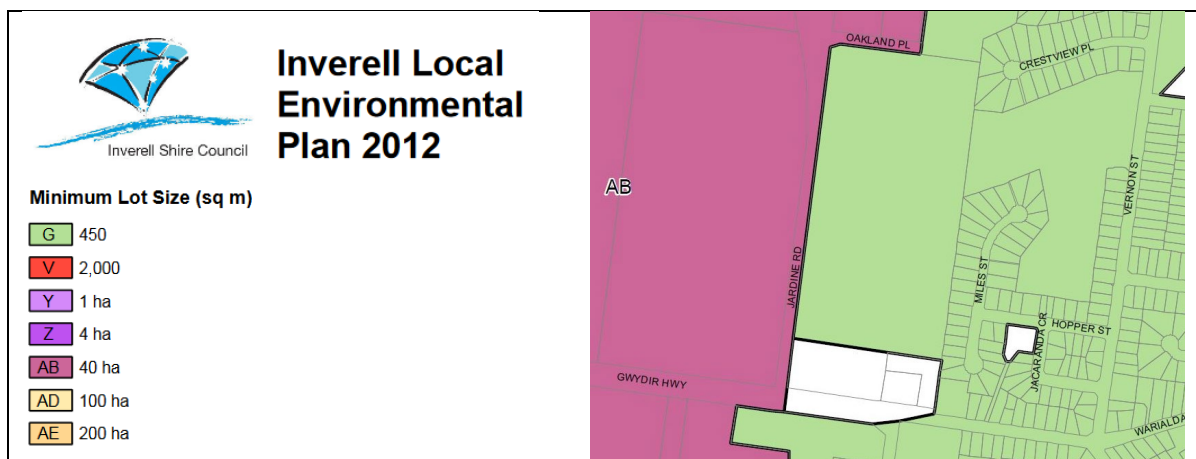


Figure 5:Current Minimum Lot Size

1.3 Bunnings Proposal

The Planning Proposal will facilitate the development of a new Bunnings store in Inverell to replace the existing store located on the eastern fringe of the Inverell town centre at the corner of Oliver and Arthur Streets. The existing site was acquired by Bunnings and opened on the 25th February 2011 with a hardware and building supplies store operating at the site under a different business brand since 1991 and existing buildings on the site dating back to 1954. The existing Bunnings store has a total floorspace of approximately 4,705m². Although the store has traded successfully since opening nearly 9-years ago, the store is small to comparable outlets in other regional towns. Further, the outlet has an overall design and layout which does not meet the contemporary expectations of hardware and home improvement customers, as well as the operational requirements of Bunnings.

Consideration was given to expand and re-configure the existing Bunnings store at its current location, however the existing site area is less than 7,000m² and a further 2 – 3 hectares would be required, and that is not an option given the developed and fragmented nature of land in this locality. As such, Bunnings are seeking to relocate and expand their Bunnings Inverell store to 60 Jardine Road (refer **Figure 2** above).

Closure of the existing Bunnings would not occur until the new facility is established, at which time Bunnings would repurpose the existing commercial building so that it can be used by alternative large format retail or showroom uses. Importantly, the financial incentive for Bunnings to re-lease - or to 'backfill' the existing store is informed by their ownership of the site.

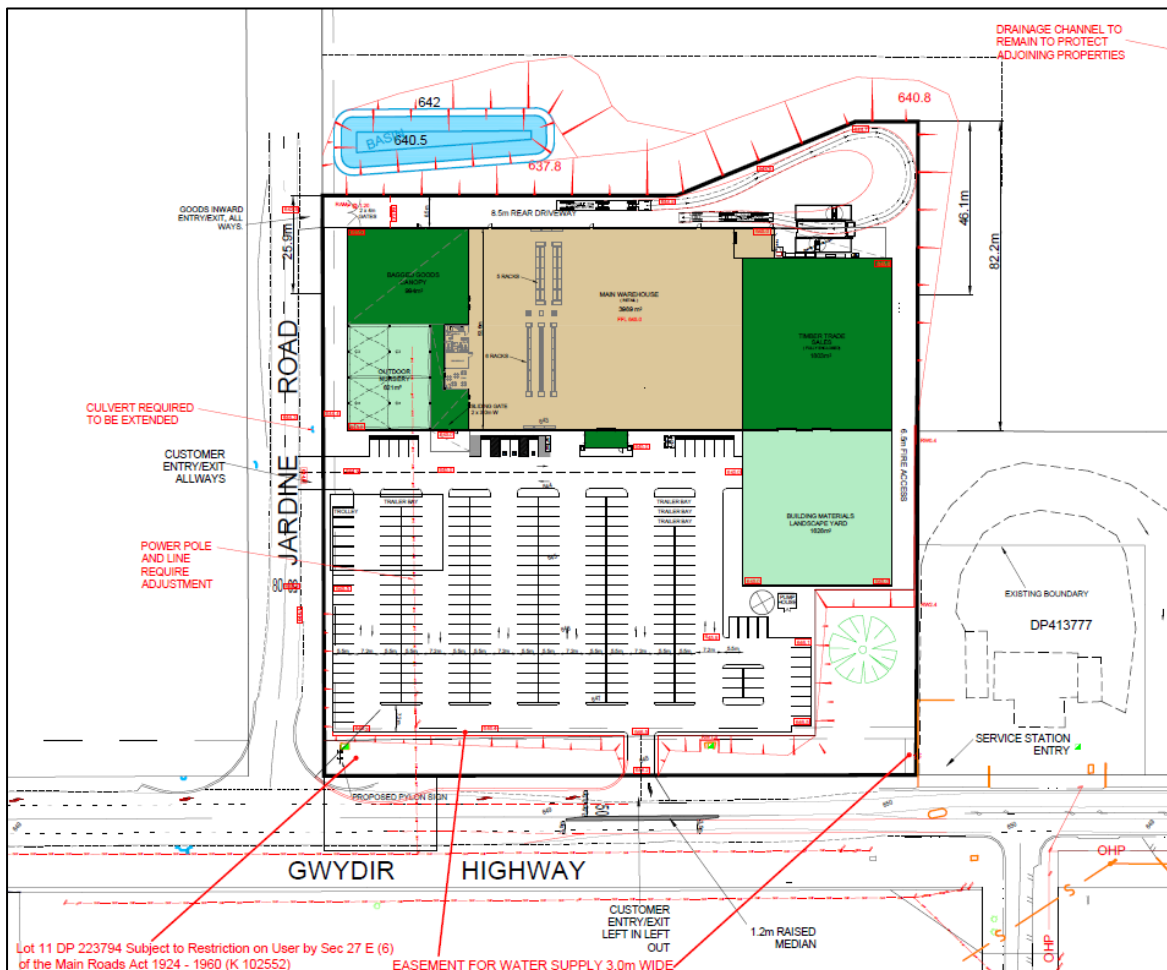


Figure 6: Bunnings Proposal

The subject site would accommodate a new Bunnings warehouse with a total area of some 9,090m². This is a size consistent with increasing demand and changing needs within the North West region. The proposed floorspace mix of the new Bunnings Inverell is shown in Table 1 and compared with the existing store. In total, the new store will almost double in size increasing floorspace by 4,385m² or 93% larger than the existing Bunnings Inverell. The new store would be supported by 214 car parking spaces and propose entry into and out of the car park via Jardine Road, with a 'left in/left out' access point on Gwydir Highway. The new store would also provide a high-quality, purpose-built, and modern format hardware warehouse which overcomes significant limitations for both customers and Bunnings associated with the existing premises.

Assuming a relatively timely approval process, the store is expected to open by June 2022.

Table 1: Comparison Between Existing and Proposed Bunnings Stores

Bunnings Facility	Existing Floor Area m ²	Proposed Floor Area	Increase Area
Main Warehouse	1,570m ²	4,040m ²	+2,470m ²
Nursery & bagged goods	570m ²	1,620m ²	+1,050 m ²
Timber trade area	2,570m ²	3,430m ²	+860m ²
Total Retail	4,705m²	9,090m²	4,380m²

In relation to the site location, the following site advantages are noted:

- **Strategic location:** the site is located on Gwydir Highway, which is the key east-west road connection through Inverell, and which has a high degree of accessibility to the surrounding North West region.
- **Exposure:** the site has significant exposure to passing traffic on the Gwydir Highway, with strong sight lines for traffic and customers within the general area.
- **Serving trade customers:** the site is well-located with respect to potential local business customers given the proximity of trade and industry uses.
- **Accessibility:** the site is easily accessible with access to be provided via both Jardine Road and Gwydir Highway.
- **Land area:** the total size of the proposed site is approximately 3.9 hectares which can easily accommodate the Bunnings warehouse building and car parking, access ways and landscaping that are required. Site depth and layout is also able to adequately accommodate the Bunnings store footprint. The area also allows for a future expansion.
- **Conservation of item of Aboriginal Heritage** – in the front south eastern corner of the site adjacent to the service station is located an aboriginal scar tree. The site is large enough and of a sufficient shape to enable this tree to be conserved as part of the development.

2 Objectives and Intended Outcome

The objective of this Planning Proposal is to enable the development of a new Bunnings store at 60 Jardine Road, Inverell while retaining and conserving an existing aboriginal scarred tree that is located on the property. This will be achieved by amending the Inverell Local Environmental Plan 2012 so as to provide additional appropriately zoned land that will facilitate large format retail development, including hardware and building supplies style businesses.

The intended outcome therefore of this Planning Proposal is to rezone additional land that will support large format retail development, and in particular hardware and building supplies style businesses, in a location that is consistent with Councils strategic planning framework namely its “Strategic Land Use Plan 2011 – 2031” and “2011 Employment Lands Strategy”.

The intended outcome is to also amend the minimum lot size map so that the minimum lot size provisions are consistent across the B5 Business Development zone in this area.

3 Explanation of Provisions

The intended outcome will be achieved by:

- Extending the current **B5 Business Development** zone over Lot 1 DP 825894, 60 Jardine Road (the subject land) north. This will result in the landuse zoning of this part of the subject land changing from the **RU1 Primary Production** and **R1 General Residential** zones to the **B5 Business Development** zone.
- Amending the **minimum lot size map** to facilitate future retail development of the site. In order to provide flexibility for future uses, the proposal is to have no minimum lot size.

This will involve amendments to the following ILEP 2012 Maps:

- Land Zoning Map – Sheet LZN_008A; and
- Lot Size Map – LSZ_008A

Figures 7 - 10 show the existing and proposed zoning and minimum lot sizes for the subject land.

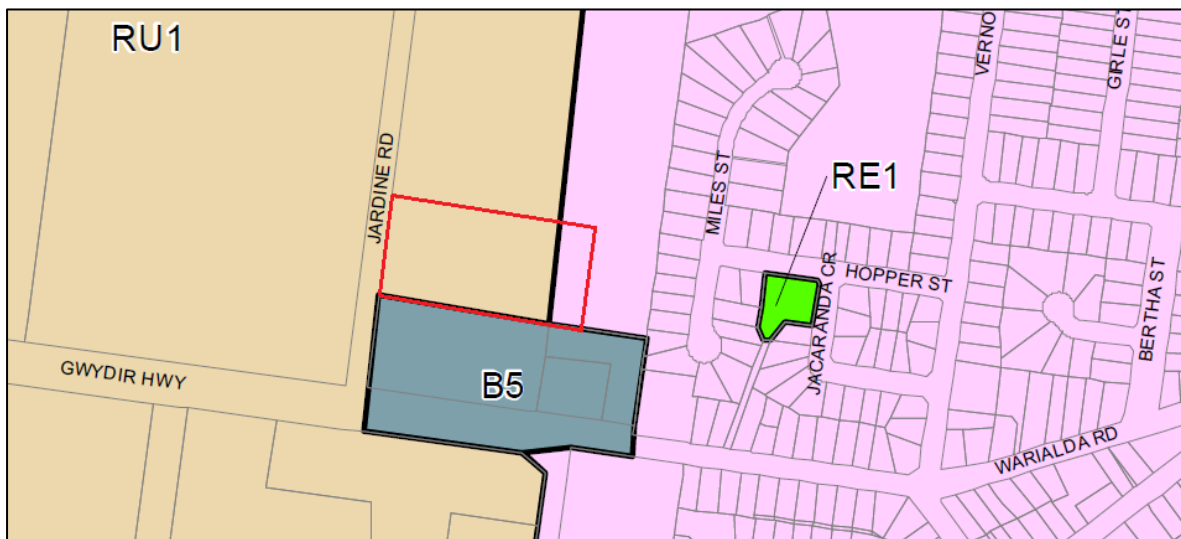


Figure 7: Existing Zoning Structure

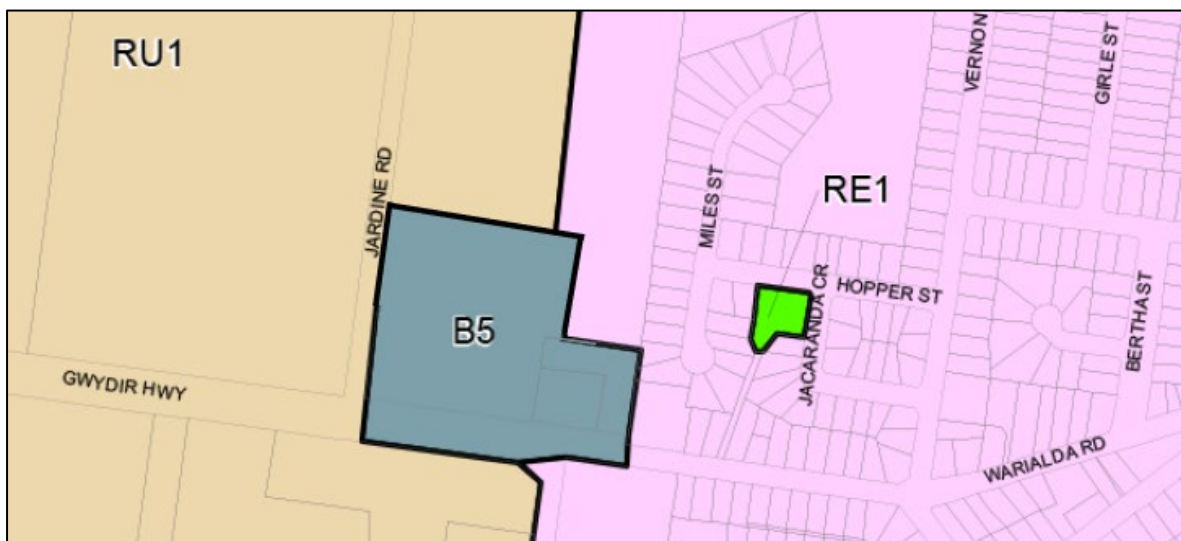


Figure 8: Proposed Zoning Structure



Figure 9: Existing Minimum Lot Size



Figure 10: Proposed Minimum Lot Size

4 Justification for Proposed Rezoning

In accordance with the Department of Planning's *guide to Preparing Planning Proposals*, this section provides a response to the following issues:

- Need for the Planning Proposal;
- Relationship to the strategic planning framework;
- Environmental, social and economic impact; and
- State and Commonwealth Interests.

4.1 Need for the Planning Proposal

4.1.1 Is the Planning Proposal a result of any Strategic Study or Report?

The catalyst for this Planning Proposal is the need for a particular business, Bunnings, which is currently restricted on its current site, to relocate to a newer site so that a larger retail facility can be provided. The subject site (the area of the rezoning) is a modest 1.8ha in area and consequently the rezoning is for a relatively small area and consequently there is no strategic study relevant to this Planning Proposal. The proponent has however commissioned two reports that justify the site selection and the economic need for the new Bunnings store.

4.1.1.1 Site Selection Audit

Insite Planning Services undertook a **Site Selection Audit** of the Inverell urban area the objective of which was to identify potentially suitable sites and assess each for their suitability for a new Bunnings store. The **Site Selection Audit** involved a six step process, namely:

1. For the purposes of the Inverell Local Environmental Plan 2012 (ILEP 2012), a Bunnings store is defined as a hardware and building supply store. Consequently, the first step in the process was to review each of the urban zones within the ILEP 2012 to determine which landuse zones permitted with consent *hardware and building supply* stores.
2. The second step was to identify the location of the landuse zones which permitted hardware and building supply stores within the Inverell urban area.
3. Then the locational and site requirements for a new Bunnings store were nominated.
4. Each location identified was then investigated from which potential sites were nominated.
5. Each site was then assessed against the site and locational criteria as well as potential planning, environmental and infrastructure considerations to determine those sites that satisfied the relevant criteria.

The primary purpose of the **Site Selection Audit** was to determine if the existing planning framework can accommodate a modern format Bunnings. The audit identified land in the following zones as potentially suitable locations to locate a new Bunnings store:

- B2 Local Centre zone
- B5 Business Development zone
- IN1 General Industrial zone

There were five areas where these zones applied within the Inverell urban area and each was identified to determine if there were suitable sites. The five areas are identified on figure Six potential sites were identified, of which five are unable to accommodate a new Bunnings Warehouse store comparable to that proposed for the Subject Site. Reasons include limited accessibility to customers; site development constraints; flooding issues; low levels of commercial exposure; and unavailability of land for purchase or lease.

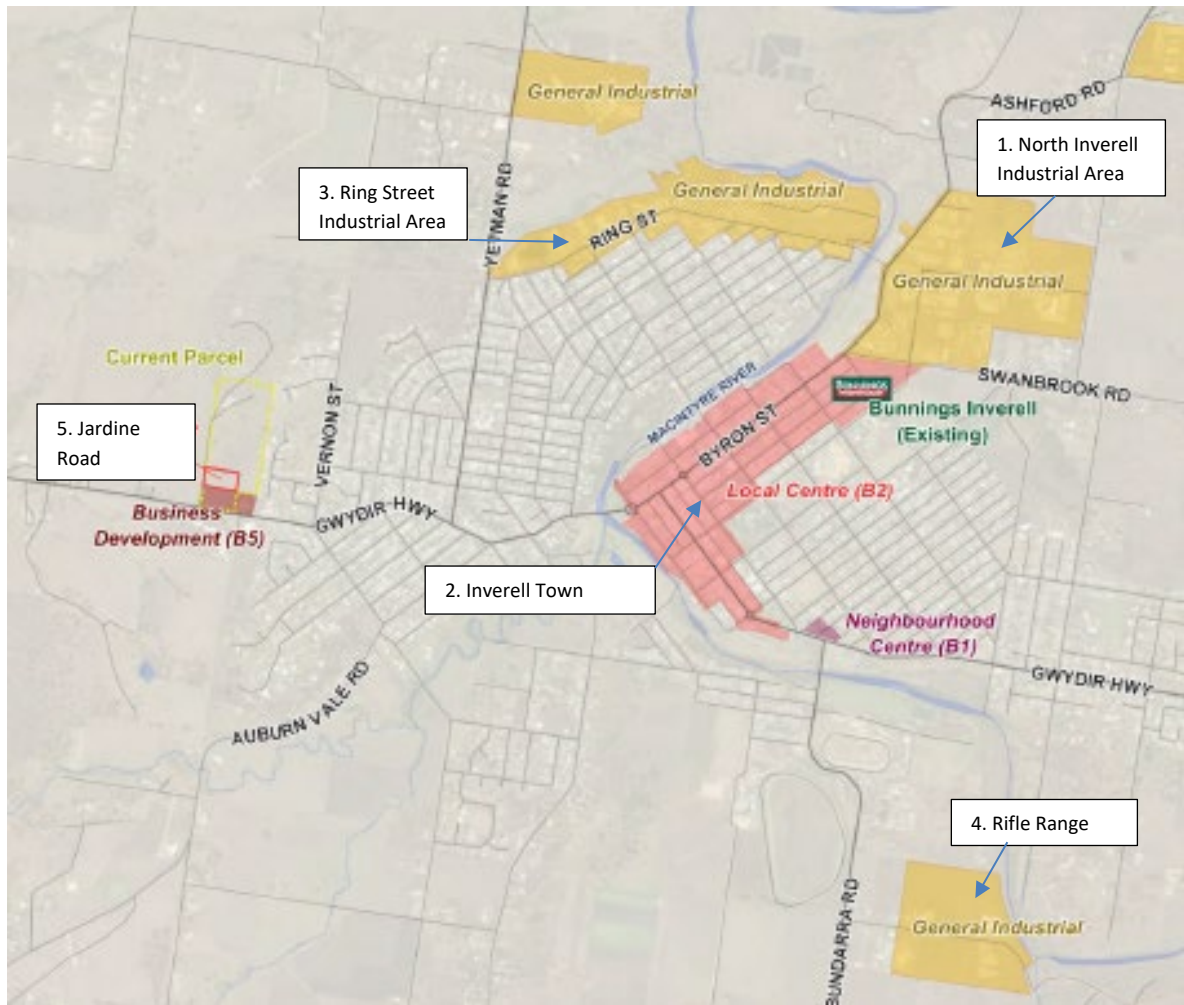


Figure 11: Potential Site Locations

In order to then assess the suitability of all of the sites available for a Bunnings store, the locational requirements of Bunnings for their new store sites was nominated as well as relevant planning considerations.

Inverell is regarded as a second tier regional market so finding the right site that meets minimum standards for Bunnings is an important consideration. The factors nominated can be summarised as follows:

- Appropriate zoning where Bunnings are a permissible use.
- Commercial exposure sites that have highest visibility and commercial traffic which for Inverell means a town centre location or a site on the Gwydir Highway.
- Suitable access for customers and service vehicles.
- Consistency with Councils Planning Framework and Strategies.
- Ready access to the necessary services and infrastructure.

- Environmental constraints and hazards consideration.
- Topography to minimise bulk earthworks.
- Site size and shape which means minimum site area of 2ha and conventional square/ rectangular shape lot.
- Compatibility with surrounding landuses.
- Economic impact on town centre

From this process six specific sites were identified and then a comparative analysis of each of them assessed with ratings provided from “complies with locational requirements” through to “showstopper” which means one of these and the site is deemed not a suitable location. As can be seen from Table 1, only the Jardine Road does not have any *showstoppers*, but that is subject to the rezoning proceeding.

Table 2: Comparative Site Analysis

Consideration/ Site	Wyndham Street	Bissett & Killeen Streets	Swanbrook Road	Ring Street	Rifle Range Road	Jardine Road
Land use Zoning	Red	Red	Red	Red	Red	Green
Commercial Exposure	Red	Red	Red	Red	Red	Green
Access	Red	Red	Green	Red	Red	Green
Strategic Planning	Red	Red	Red	Red	Red	Green
Services	Green	Green	Green	Green	Green	Green
Hazards & Constraints	Red	Red	Red	Green	Green	Green
Topography	Green	Green	Green	Green	Green	Light Green
Site Size & Shape	Red	Light Green	Red	Light Green	Green	<i>Subject to rezoning</i>
Neighbourhood Compatibility	Red	Red	Light Green	Red	Red	Green
Economic Impacts	Red	Red	Green	Red	Red	Green

Legend	
Blue	Essential Consideration
Light Blue	Important Consideration; can be managed
Green	Complies with requirements
Light Green	Satisfactory compliance with requirements
Red	Substandard compliance with requirements/ potential showstopper – subject to design and DD
Dark Red	Showstopper

As a result of the site selection audit process, the report concluded as follows:

“While hardware and building supplies are permitted with development consent within five (5) zones under the Inverell LEP 2012, the most appropriate zone for any large format retail development, including a Bunnings Warehouse style development, is the B5 Business Development zone. The Inverell Shire Council strategic planning framework also directs this form of development to the B5 zone and the Jardine Road Precinct.”

Following consultation with Council, a Site Selection Audit was undertaken focusing on the B2 Local Centre, B5 Business Development and IN1 General Industrial zones. Council in particular directed focus on a site at the end of Wyndham Street in the North Inverell Industrial Area, and to the Rifle Road precinct. Along with the Jardine Road site, a further 3 sites were also identified in the Ring Street Industrial area, adjacent to the existing Bunnings store at the northern end of the town centre, and in Bissett Street in the North Inverell Industrial area.

Of the six sites investigated, only the Jardine Road site was deemed a suitable location, and that is subject to the rezoning proceeding to give the site adequate area to locate a new Bunnings store.

The sites that Council suggested be investigated were not suitable as they did not have the required commercial exposure, were poorly located and within areas of substandard amenity. The Rifle Range Road precinct has significant area of land, and a major National Brand retail operator such as Bunnings locating in this area, notwithstanding the substandard commercial exposure, would draw other retail operators out of the town centre to locate near Bunnings as an anchor retail operator. This would have negative economic impacts on the Inverell town centre and is not desirable.”

4.1.1.2 Economic Assessment

Ethos Urban undertook an **Economic Assessment** which assesses the economic implications of the proposal to relocate and expand the existing Bunnings store in Inverell. The outcomes of the Economic Assessment are summarised in the report as follows:

“The proposed new Bunnings Inverell is double the size of the existing store, with significantly more space for product display, storage, customer circulation and operational requirements.

Policy

- *The guiding policy for planning decisions in Inverell Shire Council is the Inverell Local Environmental Plan 2012. Under the LEP, the Subject Site is located partly within the B5 Business Development zone which permits, with consent, hardware and building supplies.*
- *The objective of the B5 zone is to enable a mix of business and warehouse uses, and specialised retail premises that require a large floor area. In this regard, the development of the site for a new Bunnings store at the Subject Site is consistent with the objectives of the B5 zone.*
- *Other key strategic planning policies include the Inverell Shire Employment Lands Strategy 2011 and Inverell Strategic Land Use Plan 2012. The former plan recognises the Subject Site and surrounding area as a location where an enterprise corridor could locate. Both plans identified the need for large bulky goods retailing to locate outside the town centre. The proposed Bunnings Inverell is generally consistent with the expectation of these plans.*

Trade Area

- *A Trade Area has been defined which describes the geographic area that would be served by the new and expanded Bunnings Inverell store. This Trade Area partly reflects the current trading patterns of Bunnings Inverell, although allowing for the wider regional appeal of a new and enhanced store. A Primary Trade Area includes Inverell and surrounding areas, with a Secondary West identified to include Moree and a Secondary East including Glen Innes and Tenterfield.*

- *In 2019, the population of the Primary Trade Area was estimated at 23,500 residents. This represents total growth of +310 persons since 2011 or a growth of +40 persons per annum over the period. For the total Trade Area, the population has declined from 50,000 persons in 2011 to 49,510 persons in 2019. This slow rate of decline is forecast to continue throughout the period 2019 to 2031, with an average annual decline of -60 persons. This decline may be reversed if lifestyle changes and technology allowing remote working continues to support the desirability of living in regional areas.*

Need and Impact

- *At present, Bunnings Inverell is generating a market share of approximately 10% of spending on Bunnings Type Merchandise by Trade Area residents.*
- *The proposed new Bunnings Inverell store is forecast to achieve total turnover of approximately \$21.1m in its first year of trading. This represents an average trading level of approximately \$2,330/m². For the purposes of this analysis, the first full year of trading is assumed to be 2023. During the first year of trading, the new and expanded Bunnings Inverell store is forecast to capture approximately 24% of the retail market for Bunnings Type Merchandise in the PTA and 17% for the Trade Area overall.*
- *The proposed new Bunnings Inverell also will attract some sales which would otherwise be directed to a new Bunnings store proposed for Narrabri. In this respect, the proposed new Bunnings Inverell retains the higher-order service role of the town in the face of competitive pressure from development in other regional centres (such as Warwick and Narrabri).*
- *Any competitive trading impacts arising from the proposed new and expanded Bunnings Inverell store will be due to the potential for the spending of consumers to be diverted from alternative shopping destinations. Total spending by Trade Area residents on Bunnings Type Merchandise being directed to all other traders will decline marginally by - \$2.0m in 2023 relative to existing levels.*
- *This implies an average trading impact on competitive retailers of less than -3% on current sales and is well within the bounds of normal competitive pressure in the retail sector, and is unlikely to result in any identifiable impact on the role and function of the Inverell town centre. Furthermore, the new and enhanced Bunnings store in Inverell has the potential to attract additional spending and visitation to the town which mitigates any small trading impacts on other hardware and home improvement retailers.*

Net Community Benefit

- *The development of a new Bunnings store at the Subject Site will require a total investment of \$12.0m, including land purchase, construction cost, store fit-out and stock. This will include a capital investment of approximately \$10.8m for all building works*
- *Construction of the new building would support 21 FTE jobs in the construction industry and support a further 34 FTE jobs in related (supplier) industries over the development period. This equates to a total of around 55 FTE jobs being created directly or indirectly during the construction period.*
- *Once the existing Bunnings Inverell building is repurposed and occupied by another appropriate use, a total of approximately 130 jobs will be accommodated in Inverell across both sites. This is 80 additional jobs relative to a Business As Usual outcome, with overwhelming majority of workers living in and around Inverell.”*

4.1.2 Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

Having regard to the objects of the EP&A Act 1979, a Planning Proposal is considered to be the only means of achieving the intended outcomes. *Hardware and building supplies* businesses are currently prohibited in the RU1 Primary Production and G1 General Residential zones that applies to the subject site, and the only means of enabling such development on the site is to either rezone the site to a zone that permits this landuse, or include the landuse as a permissible use in schedule 1 of the ILEP 2012.

The B5 Business Development zone adjoins the subject land and permits *hardware and building supplies* businesses. Consequently, the most efficient way to achieve the intended outcome is to extend the B5 zone across the subject site.

It was quickly concluded that any option to expand and re-configure the existing Bunnings store at its current location is unrealistic due to the large additional site area required and the developed and fragmented nature of surrounding development. As such, Bunnings are seeking to relocate and expand their Inverell store to the Subject Site in line with the existing zoning and strategic planning framework.

4.2 Relationship to the Strategic Planning Framework

4.2.1 Is the Planning Proposal consistent with the objectives and actions of the applicable regional, sub-regional or district plan or strategy (including any exhibited draft plans or strategies?)

4.2.1.1 New England North West Regional Plan 2036

The *New England North West Regional Plan 2036* is the State governments 20-year blueprint for the future of the New England and North West region. The plan covers a vast area of the state from Gunnedah, Narrabri, and Moree in the west, to Quirindi, Tamworth and Walcha in the south, the NSW border in the north and Armidale, Glen Innes, and Tenterfield in the east.

Inverell is identified in the plan as a 'strategic centre' meaning that Inverell is seen as a major centre of regional strategic importance supporting the rural communities in that area. Provisions within the Regional Plan that are of relevance are as follows:

Direction7: Build strong economic centres

- *"Where out-of-centre commercial areas are proposed, they must be of an appropriate size to service their catchment."*
- *Action 7.2: "Focus retail and commercial activities in central business precincts and develop place-making focused planning strategies for centres."*

In relation to Direction 7, the Council strategic planning framework and the ILEP 2012 have established this area as a location for large format retailing including hardware and building supply businesses.

Direction 12: Adapt to natural hazards and climate change

- *Action 12.1: “Minimise the risk from natural hazards and the projected effects of climate change by identifying hazards, managing risks and avoiding vulnerable areas, particularly when considering new urban release areas.”*

Studies have been undertaken supporting this Planning Proposal that have established that the site does not contain areas of high biodiversity value, is not subject to bushfire risk, is not flood prone land, is not contaminated land or part of a designated waterway.

Direction 23: Collaborate with Aboriginal communities to respect and protect Aboriginal culture and heritage

- *Action 23.4: Undertake Aboriginal cultural heritage assessments to inform local land use strategies and to identify any appropriate heritage management mechanism.*

In respect to Direction 23, the outcome of an aboriginal due diligence exercise identified a scarred tree of aboriginal archaeological significance and as a result it is recommended to be retained and conserved. This has reduced the area available at 60 Jardine Road for the proposed Bunnings development and driven the need for this Planning Proposal.

Local Government Narratives - Inverell

- *“Support the development of employment lands.”*

In terms of the local narrative, the Planning Proposal will result in an extension of the B5 Business Development zone which will support the development of employment lands making the Planning Proposal entirely consistent with this direction.

4.2.2 Is the Planning Proposal consistent with Council’s Community Strategic Plan or other local strategic plan?

The following provides relevant background to the Department of Planning endorsed strategic planning work undertaken by Council since 2006. This strategic planning underpins the current zoning of the land, the subject of the rezoning request.

The relevant ‘Strategic Plans’ that support this Planning Proposal are:

- Inverell Shire Employment Lands Strategy 2011, and
- Inverell Strategic Land Use Plan 2012
- Inverell Local Environmental Plan 2012
- Inverell Development Control Plan 2013

4.2.2.1 Employment Lands Strategy 2011

The Inverell Shire Employment Land Strategy was first adopted by Council in July 2008, as part of Council's comprehensive Shire wide strategic planning which commenced in 2006.

Following adoption of the strategy Council received demand for the establishment of a large format bulky goods precinct. Council then undertook investigations which included:

- The attributes of bulky goods retailing including siting characteristics and vehicular access and transportation requirements;
- The predicted future demand and supply of bulky goods;
- Department of Planning Policies relating to market forces, planning principles, competition between businesses, and the need to cater for a future demand; and
- The possible solution in Inverell for a large format bulky goods precinct in a suitable highway location at the edge of town.

Inverell Shire Council then commissioned a review of its Employment Land Strategy. The focus of the review was the provision of large format bulky goods floorspace as well as future requirements for bulky good stores in excess of 1000 square metres gross leasable area (GLA).

The revised Employment Land Strategy was completed in August 2011 and adopted by Council as part of the Inverell Shire Strategic Landuse Plan in December 2011 (RES-182/11).

The adopted Inverell Shire Employment Land Strategy provides guidance in regard to the future development of large format bulky goods stores in Inverell. The purpose of the Inverell Employment Lands Strategy 2011 was:

"to provide Inverell Shire Council, the community, stakeholders and government agencies with a means of identifying the values and vision that will provide for the sustainable management and development of business and industrial lands, protection of key industries, and to provide the planning and policy framework to achieve this vision".

In relation to the need for large format bulky goods floorspace or future requirements for bulky goods stores in excess of 1,000 m² gross leasable area (GLA), the strategy provided a long term approach to identify the optimal location for land which was to be used for employment purposes, and to identify the most efficient method of implementing this. At section 3.2, the strategy notes the following:

"A review of the Employment Lands Strategy undertaken for Council in 2009 found that provision should be made for large format bulky goods stores or stores in excess of 1000 square metres GLA. Unencumbered land is required to cater for potential major developments requiring large sites that cannot be accommodated in the town centre or in the areas north of the town centre currently zoned Industrial and proposed to be rezoned for a smaller format bulky goods precinct.

An appropriate location for this type of development was identified in the vicinity of the Gwydir Highway and Jardine Road. It is envisioned that a potential enterprise corridor could be located on the north side of Gwydir Highway east and west of Jardine Road and on the south side of Gwydir Highway opposite Jardine Road (refer Figure 5). An enterprise corridor could be suitable for the location of space extensive highway related uses that could include:

- *large format bulky goods;*
- *automotive retail, caravan and boat sales;*
- *agricultural products sales;*
- *a service centre, including a petrol filling station, truck stop and associated uses.”*

Section 4 of the strategy document then deals with the desired ‘Planning Framework’ based on the town centre, industrial and commercial activities that are appropriate to be located outside the town centre. At *Section 4.2 of the Strategy* states:

“Inverell is an important district and sub-regional centre and services an extensive rural catchment area. There is an important need for the city to provide opportunities for space extensive businesses that are not industrial functions but extend well beyond the realm of core retailing and smaller format bulky goods retailing. There are a number of space-extensive activities that regional service cities need to accommodate. Typically these require highway frontages with good access to the region and rural areas and adjoining towns and cities.

The types of activities which require highway access and extensive sites include:

- *larger format bulky goods stores;*
- *trade supplies, including timber yards and building materials and engineering supplies;*
- *automotive, boat and caravan sales; and*
- *agricultural equipment and supply sales”.*

The area in the vicinity of the Warialda Road and Jardine Road is identified by the strategy as suitable for the future development of a large format bulky goods precinct. Figure 9 is an extract of the plan contained in the Employment Land Strategy. It should be noted that the area identified as a large format bulky goods precinct (enterprise corridor) equates to approximately 10 hectares.

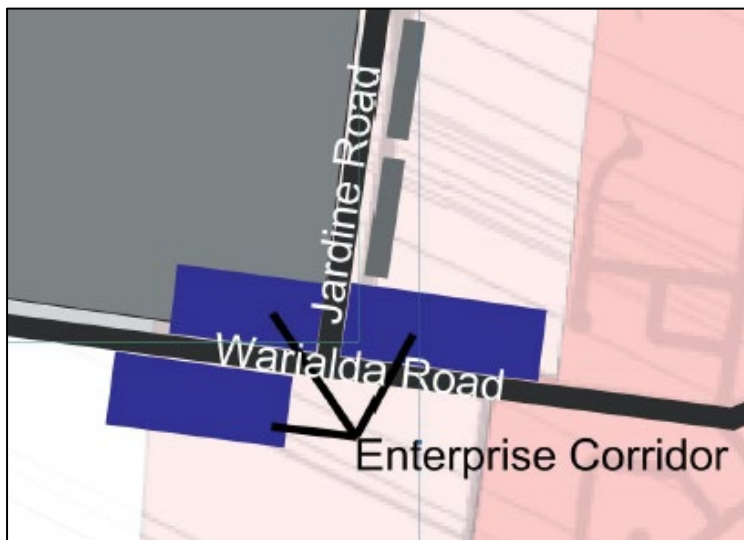


Figure 12: Employment Lands Strategy Enterprise Corridor Identification

To this end section 6 then sets out recommendations with the subject site fitting squarely within that area:

“ Consistent with the principal and supporting objectives identified in Section 4..2 it is considered the area in the vicinity of the Gwydir Highway and Jardine Road is suitable for the future development of an enterprise corridor.”

4.2.2.2 Inverell Strategic Land Use Plan 2012 (ISLUP)

The Inverell Strategic Land Use Plan (ISLUP) was adopted by Council in December 2011. The ISUP was the amalgamation of a number of strategies including the Employment Land Strategy and covers off on all landuse issues from residential growth, town centre development, industrial activity, rural issues through to land conservation and ultimately informed the preparation of the ILEP 2012. The following figure from the plan provides an illustration of its role:

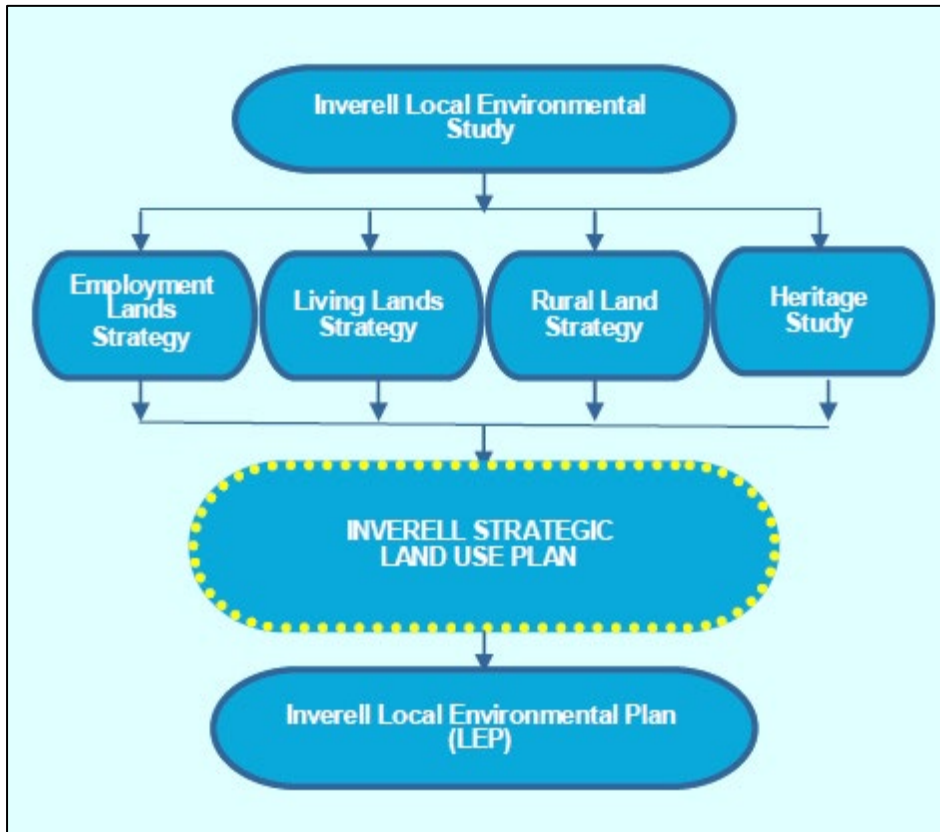


Figure 13: Inverell Strategic Landuse Plan

The ISLUP reinforces the concept of a large format bulky goods precinct as identified in the Inverell Shire Employment Land Strategy.

“The strategy also recognises that a separate precinct for larger format bulky goods type activities in accessible and visible locations outside of the CBD is required.”

After its adoption by Council in December 2011, the Inverell Strategic Landuse Plan was then endorsed by the Department of Planning and served as the primary strategic document which informed the preparation of the Draft Inverell Local Environmental Plan in 2012.

4.2.2.3 Inverell Local Environmental Plan 2012

After exhibition of the Draft Inverell Local Environmental Plan in July 2012, the Inverell Local Environmental Plan 2012 (ILEP 2012) was gazetted on 7 December 2012.

It is important to note that with the gazettal of the ILEP 2012, the 10 hectares of land identified in the Employment Land Strategy for a large format bulky goods precinct (Figure 9) was not all zoned B5 Business Development. Only approximately 2.5 hectares was zoned B5 Business Development

which also encompassed a disused service station at 143-149 Warialda Road, which at the time was expected to be demolished (Figure 2). The 2.5 hectares of B5 Business Development zoned land, including the disused service station was thought to be sufficient to facilitate the development of a single large format bulky goods store.

The rationale mandated by the Department of Planning behind only zoning part of the land identified for a large format bulky goods precinct was that an oversupply may lead to inappropriate, cheaper and smaller development in the precinct, and thus lead to adverse impacts via commercial leakage from the Inverell CBD. It was considered that the over zoning of land to B5 Business Development would undermine the objectives of Council's primary intent for the development of a vibrant and diverse town centre.

It was also understood that the services station would be redeveloped and subsumed as part of a large format retail development in this area. However, the service station was redeveloped in 2013 and reopened reducing the area available for this style development in the B5 Business Development zone by approximately 1ha. This left only 1.5ha of land appropriately zoned and this is not a large enough land area for a sustainable large format retail development.

The Department of Planning indicated that, in the future, if the B5 Business Development zone was fully developed, the Department endorsed Employment Lands Strategy's identification of additional large format bulky goods precinct land (Figure 9) west of Jardine Road and south of the Gwydir Highway would lend weight to a relatively straight forward "spot rezoning". In this case this has occurred via the development and reopening of the service station providing rational for this Planning Proposal.

4.2.2.4 Inverell Development Control Plan 2013

The Inverell Development Control Plan (DCP) was adopted by Council in July 2013. The aim of the DCP is to provide further guidance on development in the Shire, and to support the objectives, intent and direction of Council's planning policies and environmental planning instruments, namely the Inverell *Local Environmental Plan 2012*.

Chapter 4 of the DCP relates to commercial and industrial development. The following extract shows the intent for development in the various commercial precincts within the town.

"4.2 Intent

The intent of this chapter is to:

- *Promote orderly and well designed development in accordance with the hierarchy of commercial precincts within Inverell. These precincts are:*
 - **Town Centre Core Area** – *The preferred location for shopfront retail activity, including major new stores (excluding bulky goods), and is also the main pedestrian area within the town centre. This core includes a periphery of major community facilities, office and professional services.*
 - **Town Centre Outer Area** – *Adjoins the town centre core area and is currently characterised by light industrial and commercial activities. Refer to Figure 4.1. Small format bulky goods stores or stores less than 1000m² Gross Floor Area (GFA) are*

encouraged in this area. Large retail outlets greater than 1000m² GFA should not be located in the Town Centre Outer Area.

- **Enterprise Corridor** – *The area zoned B5 Business Development under the ILEP and which provides an effective land supply and appropriate location for the development of large floor area highway related commercial activities (i.e. large format bulky goods) that cannot be accommodated in the other commercial precincts.*
- **Neighbourhood Centres** – *A range of small scale precincts zoned B1 Neighbourhood Centre under the ILEP containing retail, business and community uses designed to serve the surrounding neighbourhood.*
- *Sustain Inverell's role as an important district and sub-regional industrial centre, with the continuing provision of cost competitive, attractive and well-planned industrial areas to meet the town's requirements for the foreseeable future.*
- *Consider appropriate commercial and industrial development outside of commercial and industrial zoned areas, where the development is permissible and compatible with the surrounding area and the establishment of such will not adversely impact on the viability of the central business district of Inverell."*

In summary, it can be seen the intent of the DCP is that any type of bulky goods development is not preferred in the Town Centre Core area (CBD) and only small format bulky goods stores less than 1000 square metres GFA are encouraged in the Town Centre Outer Area. The "Enterprise Corridor" (land zoned B5 Business Development) is set aside for large format bulky goods and highway related commercial activities that cannot be accommodated in either the Town Centre Core or Outer Areas.

4.2.2.5 Consistency with Local Strategic Planning Framework

As stated earlier in this report, the "Planning Proposal is being driven by a scheme for a new Bunnings store to service Inverell and the North West region on land located on the corner of the Gwydir Highway and Jardine Road at the western gateway to Inverell".

Under the ILEP 2012, a "Bunnings Warehouse" development is characterised as a 'Hardware and building supplies', which is permissible with consent in the B5 Business Development zone but prohibited within the RU1 Primary Production and R1 General Residential zones.

The portion of Lot 1 DP 825894 zoned B5 Business Development under the ILEP 2012 is approximately 1.54 hectares (**Figure 2**). The indicative area identified for a new Bunnings Warehouse development on Lot 1 DP 825894 is approximately 3.24 hectares. Therefore, the amendment requested is for enlarging the existing B5 Business Development zone over Lot 1 DP 825894 immediately to the north by approximately 1.8 hectares. This would result in the zoning of approximately 1.56 hectare of the subject land changing from the RU1 Primary Production zone to the B5 Business Development zone, and .23ha from the R1 General Residential zone to the B5 Business Development zone.

An indicative zoning map for the requested amendment is shown in **Figure 8**. For a comparison against the current zoning of Lot 1 DP 825894 previously shown, refer to **Figure 7**.

The Planning Proposal also requests an amendment to the current minimum lot size map to have no minimum lot size applying to the enlarged B5 Business Development zone. An indicative minimum lot size map for the requested amendment is shown in **Figure 10**. For a comparison against the current minimum lot sizes applicable to Lot 1 DP 825894 previously shown, refer to **Figure 9**. The rationale for this is to maintain consistency in the minimum lot size across the B5 Business Development zone in this area.

The proposed rezoning will leave a portion of land between the eastern boundary of the rezoning and the western boundary of existing residential properties facing Miles Street. The width of this length of land is 84m which provides ample area for a local road and a row of residential lots.

4.2.3 Is the Planning Proposal consistent with applicable State Environmental Planning Policies?

Table 3 provides an assessment of the Planning Proposal against all relevant State Environmental Planning Policies.

Table 3: Relevant State Environmental Planning Policies

Policy	Relevance	Consistency and Implications
SEPP No. 55 – Remediation of Land	SEPP No. 55 aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Clause 6 of SEPP No 55 requires that contamination and remediation be to be considered in the rezoning of land. Specifically, Clause 6 requires that: (a) the planning authority has considered whether the land is contaminated, and (b) if the land is contaminated, the planning authority is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for all the purposes for which land in the zone concerned is permitted to be used, and (c) if the land requires remediation to be made suitable for any purpose for which land in that zone is permitted to be used, the planning authority is satisfied that the land will be so remediated before the land is used for that purpose.	Based on a visually inspection and an background search, the subject site has historically been used for cattle and sheep grazing purposes only and consequently there has been no historic use of the subject land that would have likely resulted in any gross contamination.

Policy	Relevance	Consistency and Implications
SEPP No. 64 – Advertising and Signage		The Planning Proposal does not contain provisions that would be inconsistent with or hinder the application of the SEPP. This SEPP may apply to signage associated with any future development application.
State Environmental Planning Policy (Koala Habitat Protection) 2019	The Koala SEPP aims to encourage the proper conservation and management of areas of natural vegetation that provide habitat for koalas.	An assessment was undertaken by environmental consultants Ecological who provided the following assessment: <i>“Potential Koala habitat was assessed in accordance with the State Environmental Planning Policy No. 44 – Koala Habitat Protection (SEPP 44). The impact area was not determined to be either potential or core Koala habitat in accordance with SEPP 44, due to the identification of only five mature individual key feed trees of Eucalyptus albens and the development site being part of a non-contiguous patch. There are six historical records of Koalas observed within a 10 km radius of the development site (OEH 2018) with the most recent being scats found in Copeton Dam Road TSR (11 km). The last physical sighting recorded was in 2006 in vegetation along the Macintyre River (3 km). Further assessment using the ‘EPBC Act referral guidelines for the vulnerable Koala’ (Department of the Environment [DoE], 2014) was undertaken which concluded that significant impacts to Koala would not occur as a result of the proposed development.”</i>
SEPP Infrastructure 2007	Clause 101 of this SEPP relates to development with a frontage to a classified road and Clause 104 relates to assessment of traffic impacts of certain types of development, such as development with car parking supply in excess of 200 vehicles.	<p>Frontage to a Classified Road</p> <p>Clause 101 of the Infrastructure SEPP sets out provisions relating to development with a frontage to a classified road. While the Gwydir Highway is a classified road, the subject site fronts Jardine Road only. Notwithstanding, any future development would include the land fronting the highway and consequently any future application must ensure that there are no adverse impacts on the efficiency and ongoing operation of the road and ensure that it is appropriately located and designed to address potential traffic noise or vehicle emissions. This will be addressed at DA stage.</p>

Policy	Relevance	Consistency and Implications
		<p>Traffic Generating Development Clause 104 applies to developments of the relevant size or capacity that either:</p> <ul style="list-style-type: none"> <i>a) has direct vehicular or pedestrian access to any road,</i> <i>or</i> <i>b) has direct vehicular or pedestrian access to a classified road or to a road that connects to a classified road where the access (measured along the alignment of the connecting road) is within 90m of the connection.</i> <p>As with the assessment under Clause 101 above, while the property has frontage to the Gwydir Highway, the subject sites does not have frontage to a classified road and is not within 90m of the classified road. Consequently, the provisions of Clause 104 do not apply to this Planning Proposal, however any future Development Application will and require referral to the Roads and Maritime Service (RMS) for comment.</p>



4.2.4 Is the Planning Proposal consistent with applicable Ministerial Directions?

The applicable Ministerial Directions are addressed below in **Table 4**.

Table 4: Section 9.1 Directions

Direction	Provision	Consistent	Justification
<p>1.1 Business and Industrial Zones.</p>	<p>The objectives of this Direction are as follows:</p> <ul style="list-style-type: none"> <i>a) encourage employment growth in suitable locations</i> <i>b) protect employment land in business and industrial zones, and</i> <i>c) support the viability of identified strategic centres.</i> <p>A Planning Proposal must:</p> <ul style="list-style-type: none"> <i>(a) give effect to the objectives of this direction,</i> <i>(b) retain the areas and locations of existing business and industrial zones,</i> <i>(c) not reduce the total potential floor space area for employment uses and related public services in business zones,</i> <i>(d) not reduce the total potential floor space area for industrial uses in industrial zones, and</i> 	<p>It is considered that the Planning Proposal is consistent with these objectives in that it:</p> <ul style="list-style-type: none"> • Facilitates employment growth as an extension to the existing area along the Gwydir Highway zoned for business development; • Facilitates employment growth consistent with Council strategic direction for large format and hardware style business growth; • Does not adversely impact established business and industrial zones within Inverell. <p>The Planning Proposal is consistent with this direction as it:</p> <ul style="list-style-type: none"> • Will retain the areas and locations of existing business and industrial zones, • Will increase the total potential floor space area for employment uses and related public services in business zones, 	<p>The proposal is consistent with this direction, and therefore no justification is required.</p>



Direction	Provision	Consistent	Justification
	<p><i>(e) ensure that proposed new employment areas are in accordance with a strategy that is approved by the Secretary of the Department of Planning and Environment.</i></p>	<ul style="list-style-type: none"> • Will not reduce the total potential floor space area for industrial uses in industrial zones, and • Is in accordance with the <i>Inverell Strategic Land Use Plan 2012</i> that has been approved by the Secretary of the Department of Planning and Environment. 	
<p>1.2 Rural Zones</p>	<p>The objective of this direction is to protect the agricultural production value of rural land.</p> <p>This direction applies when a relevant planning authority prepares a Planning Proposal that will affect land within an existing or proposed rural zone.</p> <p>A Planning Proposal must:</p> <p><i>(a) not rezone land from a rural zone to a residential, business, industrial, village or tourist zone.</i></p> <p><i>(b) not contain provisions that will increase the permissible density of land within a rural zone (other than</i></p>	<p>The proposal seeks to rezone land partly from a rural zone to a business zone so is not consistent with this objective.</p> <p>A Planning Proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the Planning Proposal that are inconsistent are:</p> <p><i>(a) justified by a strategy which:</i></p> <p><i>(i) gives consideration to the objectives of this direction,</i></p> <p><i>(ii) identifies the land which is the subject of the Planning Proposal (if the Planning Proposal relates to a particular site or sites),and</i></p>	<p>The inconsistency is justified as follows:</p> <p>a) The proposal is consistent with both the <i>Inverell Employment Lands Strategy 2011</i> and the <i>Inverell Strategic Land Use Plan 2012</i> that has identified this area for future large format retailing purposes.</p> <p>b) Is not inconsistent with the <i>New England North West Regional Plan 2036</i>.</p> <p>c) The subject site is split zoned with the part zoned RU1 comprising approximately 1.75ha of land which is a relatively small area and is therefore of minor significance.</p>



Direction	Provision	Consistent	Justification
	<p><i>land within an existing town or village).</i></p>	<p><i>(iii) is approved by the Director-General of the Department of Planning, or</i> <i>(b) justified by a study prepared in support of the Planning Proposal which gives consideration to the objectives of this direction, or</i> <i>(c) in accordance with the relevant Regional Strategy, Regional Plan or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or</i> <i>(d) is of minor significance</i></p>	
<p>1.5 Rural Land</p>	<p>This direction applies when a relevant planning authority prepares a Planning Proposal that:</p> <p><i>(a) will affect land within an existing or proposed rural or environment protection zone (including the alteration of any existing rural or environment protection zone boundary) or</i></p>	<p>The proposal is consistent with this direction as it:</p> <p>a) Is consistent with the both the <i>Inverell Employment Lands Strategy 2011</i> and the <i>Inverell Strategic Land Use Plan 2012</i> that has identified this area for future large format retailing purposes.</p> <p>b) Is a relatively small site of some 1.45ha and consequently will not impact on agriculture and primary production.</p> <p>c) Is not going to impact on any environmental values of the site.</p>	<p>The proposal is consistent with this direction, and therefore no justification is required.</p>



Direction	Provision	Consistent	Justification
	<p><i>(b) changes the existing minimum lot size on land within a rural or environment protection zone.</i></p> <p>This Planning Proposal will affect land within an existing rural zone. Consequently, the Planning Proposal must:</p> <p><i>(a) be consistent with any applicable strategic plan, including regional and district plans endorsed by the Secretary of the Department of Planning and Environment, and any applicable local strategic planning statement</i></p> <p><i>(b) consider the significance of agriculture and primary production to the State and rural communities</i></p> <p><i>(c) identify and protect environmental values, including but not limited to, maintaining biodiversity, the protection of native vegetation, cultural heritage, and the importance of water resources</i></p> <p><i>(d) consider the natural and physical constraints of the land,</i></p>	<p>d) Is consistent with the natural and physical characteristics of the site.</p> <p>e) Will not compromise opportunities for investment in productive, diversified, innovative and sustainable rural economic activities.</p> <p>f) Adjoining rural land is used for grazing purposes and consequently the proposal will not lead to landuse conflict with existing farming operations and effect farmers right to farm principles.</p> <p>g) Is not going to compromise State significant agricultural land.</p> <p>h) Will result in an efficient and economical use of the subject land consistent with the social, economic and environmental interests of the community.</p>	



Direction	Provision	Consistent	Justification
	<p><i>including but not limited to, topography, size, location, water availability and ground and soil conditions</i></p> <p><i>(e) promote opportunities for investment in productive, diversified, innovative and sustainable rural economic activities</i></p> <p><i>(f) support farmers in exercising their right to farm</i></p> <p><i>(g) prioritise efforts and consider measures to minimise the fragmentation of rural land and reduce the risk of land use conflict, particularly between residential land uses and other rural land uses</i></p> <p><i>(h) consider State significant agricultural land identified in State Environmental Planning Policy (Primary Production and Rural Development) 2019 for the purpose of ensuring the ongoing viability of this land</i></p> <p><i>(i) consider the social, economic and environmental interests of the community.</i></p>		



Direction	Provision	Consistent	Justification
<p>3.4 Integrating Land Use and Transport.</p>	<p>The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:</p> <ul style="list-style-type: none"> <i>(a) improving access to housing, jobs and services by walking, cycling and public transport, and</i> <i>(b) increasing the choice of available transport and reducing dependence on cars, and</i> <i>(c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and</i> <i>(d) supporting the efficient and viable operation of public transport services, and</i> <i>(e) providing for the efficient movement of freight.</i> <p>This direction applies when a Planning Proposal will create, alter or remove a zone or a provision relating to urban land, including land zoned for</p>	<p>The site has frontage to two roads and the intersection of Jardine Road and Gwydir Highway and has been designed to cater for traffic generated from the future development of the site. The site's access to Gwydir Highway provides good road connections to the regional road network.</p> <p>A Traffic Impact Assessment has been prepared which demonstrates that the existing road network is capable of accommodating any potential increase in traffic generation from the rezoning.</p> <p>The Planning Proposal is considered consistent with the relevant guidelines published by the Department (of Urban Affairs & Planning) in 2001 in the context of the site and Inverell as a regional town.</p>	<p>The proposal is consistent with this direction, and therefore no justification is required.</p>



Direction	Provision	Consistent	Justification
	<p>residential, business, industrial, village or tourist purposes.</p> <p>As the proposal intends rezoning land for a business use, this Direction applies. The Planning Proposal must therefore apply the aims, objectives and principles of Guidelines published by the Department (of Urban Affairs & Planning) in 2001, entitled:</p> <ul style="list-style-type: none"> • “Improving Transport Choice”, and • “The Right Place for Business and Services”. 		
<p>5.10 Implementation of Regional Plans.</p>	<p>The Direction requires Planning Proposals to be consistent with the Central West and Orana Region Regional Plan 2036.</p>	<p>The proposal is consistent with the Central West and New England North West Regional Plan 2036– refer to section 4.2.1.1 of this Planning Proposal.</p>	<p>The proposal is consistent with this direction and therefore no justification is required.</p>
<p>6.1 Approval and Referral Requirements.</p>	<p>A Planning Proposal must not include referral or concurrence requirements without approval of the pertinent Minister of public authority or identify development as ‘designated’ without approval of the Secretary of Planning & Environment.</p>	<p>To implement this proposal, a LEP to rezone the subject land would not require specific or additional referral, consultation, or concurrence provisions. The proposal(s) is consistent with this direction.</p>	<p>The proposal is consistent with this direction and therefore no justification is required.</p>



Direction	Provision	Consistent	Justification
<p>6.3 Site Specific Provisions</p>	<p>A Planning Proposal that will amend another environmental planning instrument in order to allow a particular development proposal to be carried out must either:</p> <p>(a) allow that land use to be carried out in the zone the land is situated on, or</p> <p>(b) rezone the site to an existing zone already applying in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already contained in that zone, or</p> <p>(c) allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended.</p> <p>(5) A Planning Proposal must not contain or refer to drawings that show details of the development proposal.</p>	<p>This Planning Proposal contains drawings that show details of a development proposal.</p> <p>The direction allows inconsistency as follows:</p> <p>A Planning Proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are of minor significance.</p>	<p>The Planning Proposal is a direct result of the need to zone additional land to facilitate a Bunnings development on the site consistent with Councils strategic planning framework and directions from the Department of Planning when the B5 Business Development zone was original introduced into the Jardine Road precinct.</p> <p>It is of minor significance given it is entirely consistent with the Councils strategic planning framework and that it proposes to only rezone an additional 1.8ha of land.</p>

4.3 Environmental, Social and Economic Impact

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

The land subject to this Planning Proposal has been investigated for potential ecological impacts by **Eco Logical** who have commented as follows:

“Seventeen threatened flora species and 30 fauna species were identified from database searches as known, likely or having the potential to occur within the development site area. No threatened flora or fauna species were identified during the field surveys. Threatened fauna habitat was assessed, comprising mainly four individual hollow-bearing trees to be removed within the development site. Fourteen species-credit species (eight flora and six fauna) were surveyed in December and February 2018/19. The development site was determined to be substantially degraded that it is unlikely to support populations of threatened species. No threatened species were recorded, and no species credits were required to be calculated.

SAll values have been considered as part of this assessment. These values include ‘White Box Yellow Box Blakely’s Red Gum Woodland’. A threshold of 0 is assumed and therefore it is possible that SAll could occur. However, given the highly degraded nature of the site, serious impacts are unlikely, and a referral is not required.”

In relation to an assessment under the Biodiversity Conservation Act the consultant’s report states:

“For vegetation zone 1 – PCT 590 Low, the BAMC generated a vegetation integrity score of 18.4. This is below the threshold (score <20) required to offset native vegetation and therefore no ecosystem credits are required to offset the removal of 2.13 ha for vegetation zone 1. For vegetation zone 2 – PCT 590 Moderate (TEC), the BAMC generated a vegetation integrity score of 23.3. Three ecosystem credits are required to offset the removal of 0.22 ha for vegetation zone 2. Given the lack of suitable habitat, and no threatened species were identified during field surveys no species credits were required to be calculated.”

4.3.2 Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

4.3.2.1 Flooding

The land subject to this Planning Proposal is elevated and not identified by Council as being flood prone land.

4.3.2.2 Bushfire

Council records indicated that the site is not mapped as bushfire prone land.

4.3.3 Has the Planning Proposal adequately addressed any social and economic effects?

4.3.3.1 Aboriginal Archaeology

This Planning Proposal is being driven by the need to conserve a scarred tree that was located during due diligence investigations in the south eastern frontage of the site adjoining the service station. The need to conserve the tree and a curtilage around the tree effectively reduces the available area on the site zoned B5 Business Development such that there was insufficient area left to develop a new Bunnings hardware and building supplies business. Consequently, the Planning Proposal is to extend the B5 Business Development zone to in part compensate for this loss of land. The area where the zoning extension occurs, the subject site identified in figures 1 & 2, does not contain any items of aboriginal heritage significance.

Heritage conservation is covered by a compulsory clause in the Standard Instrument (Local Environmental Plans) Order 2006, and the ILEP 2012 has adopted the Standard Instrument provisions with respect to heritage conservation.

An investigation has been undertaken in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW*. The purpose of the due diligence assessment (Eco Logical/ELA) was firstly to identify whether there are Aboriginal objects or places present in the Study Area and/or whether there are specific Aboriginal cultural constraints on the Study Area. The second aim was to identify whether the proposed activity will impact the Aboriginal heritage identified.

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database maintained by the Office of Environment & Heritage (OEH) identified 13 sites within 10 km of the study area.

A pedestrian survey of the entire study area was also undertaken, and the results of this assessment did not identify any areas of archaeological potential within the subject site, however, as noted above, a culturally scarred tree was identified during the survey by the Aboriginal Representatives. The site has been recorded on AHIMS by Diane Marlow as “*Warialda Highway new Bunnings complex site*” AHIMS ID 11-6-0133.

In order to conserve this scarred tree, the following recommendation has been made:

Recommendation – Scarred Tree

“It is recommended that the development be modified so that the scarred tree is avoided by all proposed work on the site. It is also recommended that the tree be fenced with a suitable buffer of approximately 15 m to prevent any inadvertent impacts to the tree, its branches and its roots from the proposed development. The proponent has taken this into consideration and redesigned the layout for the proposed Bunnings in order to conserve the scarred tree site with a buffer of approximately 17 m (Figure 2). This should include fencing off of the scarred tree site during construction works to ensure no damage is inflicted during construction of the warehouse.”

As noted above, adoption of this recommendation will result in a reduction in the developable area zoned B5 Business Development which this Planning Proposal is seeking to rectify such that the Bunnings Development can proceed.

4.3.3.2 Economic Impacts

This Planning Proposal will facilitate a new Bunnings store which represents an expansion and enhancement of large-format retailing in Inverell at a location supported by strategic policy as a location for employment land growth. The proposed rezoning of the Subject Site effectively extending the current B5 Business Development zone in this location represents a logical and timely expansion of employment land.

The development of a new Bunnings store at the subject site will require a capital investment of approximately **\$10.8 million**. Including land purchase and other non-construction costs, the total commitment associated with the project is approximately \$18.3 million.

This investment will be of significant benefit to the regions trade and construction industries.

The Planning Proposal will enable the new Bunnings development which will provide a positive economic contribution via the job creation directly and indirectly. Specifically, the following employment would be generated as a result of the development:

Direct employment in the construction industry depends on the nature of the building, in particular, the capital intensity of the project. The **Economic Assessment** that accompanies this Planning Proposal has estimated 1.96 FTE direct construction industry job years per \$1 million of expenditure (or 1.0 FTE job year per \$510,000) will be generated by the construction activity, based on research and the type of work expected to be undertaken in the construction phase of the site.

In addition, these direct construction industry jobs lead to demand for employment in supplier industries in the wider economy. The ABS construction multiplier is 2.6 - that is, for every single FTE job in the construction industry a further 1.6 FTE jobs are supported elsewhere in the economy.

Total construction costs of \$10.8 m would support 21 FTE jobs *in the construction industry* and support a further 34 FTE jobs *in related (supplier) industries* over the development period. This equates to a total of around 55 FTE jobs being created directly or indirectly during the construction period.

When the store becomes fully operational Bunnings have advised that the store will employ 75 people being a mixture of full time, part time and casual positions. The current store employs 50 people meaning an increase of 25 jobs.

Backfilling of the existing Bunnings Inverell store with employment from new businesses will also create additional jobs. The Economic Assessment has also estimated that once the existing Bunnings Inverell building is repurposed and occupied by another appropriate use, it will generate a further 25 jobs.

It can be anticipated that further flow on effects on employment are created in the broader economy as a result of the potential income and employment generated. Using a conservative employment multiplier of 1.9 (as recommended by the Australian National Accounts guidelines), there could be the potential flow on effect of 95 additional ongoing jobs (FT, PT and casual) throughout the local economy. That is a total of an additional 145 potential new jobs.

Bunnings is also an important source of employment for older people seeking to re-enter the workforce, or those no longer working full-time but who are seeking casual work.

4.3.3.3 Social Impacts

With regards to specific social impacts it was identified that the likely area of affectation (ie the area where the social impacts are most likely) is determined to be within the vicinity of the development. In considering the social impacts the following conclusions have been derived:

Table 5: Social Impact Assessment

Social Assessment	Impact Comment
Changes to the population and characteristics of the area.	The Bunnings development is expected to have no impact on the population and its characteristics.
Economic costs and benefits.	The Bunnings development is expected to have a positive impact with particular focus on job creation (directly and indirectly). Refer to section 3.1.1.2 and 4.3.3.2 of this Planning Proposal.
The community structure, its character, or beliefs.	The Bunnings development is expected to have no impact on the community structure
The health and safety of those living and working in the vicinity of the development.	The Bunnings development is expected to create no adverse impacts on the health and safety of the local community.
Accessibility	All new Bunnings store developments are designed and constructed so that they are compliant with the BCA and is accessibility requirements.
Cost of living, including housing affordability.	The Bunnings development is expected to have no impact on the cost of living however will increase competition in the building supplies industry which could lead to a reduction in building supply costs.
Sense of place and community	A land use assessment indicates that due to surrounding development, the location, natural barriers (road), accessibility from the Gwydir Highway and proximity to existing residences the Bunnings development will have no adverse impact on the sense of place and community.

In addition to contributing to investment and supporting job creation, the Planning Proposal facilitating a new Bunnings store would be expected to generate the following benefits:

- Improved access to an affordable, larger scale, hardware, and homemaker retailer for residents in the trade area.
- Improved access for local residents and trade customers to a wide range of well-priced hardware and homeware goods.
- New jobs for the local labour force.
- Introduction enhanced building/hardware supplies at a location convenient for business and trade customers within the region.
- Improved access for trade and business customers to hardware and trade supplies

- Enhancing the regional service role of Inverell in a manner consistent with the economic development objectives of Council
- A demonstrated major investment in Inverell by a high profile ASX listed entity (Wesfarmers Group)
- Additional employment land able to accommodate economic development supporting population growth and prosperity in Mudgee and the wider region.

Overall, the Planning Proposal will result in an overall positive economic and social impact on the broader LGA as well as the local community of Inverell. The development is consistent with the planning framework and will provide ongoing jobs.

4.3.3.4 Noise

A Noise Impact Assessment (NIA) for the overall Bunnings development has been undertaken by acoustic consultants *Reverb* to accompany a future development application subject to a successful Planning Proposal outcome. The NIA concludes that the site is suitable for the intended purpose providing recommendations to be incorporated into the design which will ensure that noise from the site will be either within the criterion or generally below the existing noise levels in the area for the majority of the time.

With relatively constant traffic on nearby roads, and the abundance of nearby commercial development, noise generated by the proposed site will be audible at times but not intrusive at any nearby residence. As the character and amplitude of activities associated with the site will be similar to those already impacting the area, it will be less intrusive than an unfamiliar introduced source and should be acceptable to residents.

4.4 State and Commonwealth Interests

4.4.1 Environmental Considerations

In respect to the Commonwealth EPBC Act, Eco Logical who undertook the Ecological Assessment of the subject site and concluded as follows:

“An assessment of the Commonwealth Significant Impact Criteria (Commonwealth of Australia 2013) was applied to nine threatened species listed under the EPBC Act, including one reptile Five-clawed Worm-skink; three mammals, Koala, Grey-headed Flying-fox, Corben’s Long-eared Bat; three bird species, Regent Honeyeater, Painted Honeyeater, Swift Parrot; and two endangered flora species, Hawkweed and Austral Toadflax. The assessments concluded that the project would not have a significant impact on the above-mentioned species. A referral to the Commonwealth is not required.”

4.4.2 Is there adequate public infrastructure for the Planning Proposal?

4.4.2.1 Access, Transport and Traffic

To determine whether the road network can adequately serve the needs of the intended future development, a traffic impact assessment has been prepared in respect to the future development of the subject site by Transport and Traffic Planning Associates. The report considers the likely impacts of the envisaged access arrangements and potential traffic implications of the envisaged development on the local road network.

Based on the findings of this investigation it is evident that the existing public road network and public transport services can accommodate the predicted demands imposed by future development resulting from the Planning Proposal.

4.4.2.2 Infrastructure Services

A Preliminary Services Infrastructure Strategy has been undertaken by *High Definition Design* in relation to servicing the site for water supply, sewerage, power, and communications. This investigation confirmed that all essential services are readily available to be connected to the subject site.

Notwithstanding, Clause 6.6 of the ILEP 2012 requires that Council be satisfied that relevant services that are essential for any proposed development are available or that adequate arrangements have been made to make them available when required.

4.4.3 Stormwater Management & Downstream Flooding

A Stormwater Management Plan (SWMP) has also been prepared addressing potential for downstream flooding. The SWMP has been prepared in accordance with the stormwater quantity and quality requirements of the Inverell Shire Council's Development Control Plan for industrial Development and Subdivisions.

The scope of the report includes an identification of the stormwater management requirements for the proposed development and in order to devise a stormwater management strategy.

The increase in impervious areas and alteration of the natural topography due to land development has the potential to increase and concentrate peak storm flows. This has the potential to impact on flow regimes and cause erosion of the downstream drainage network and associated waterways.

The site generally drains towards the north-eastern boundaries. Stormwater runoff from the site surface flow toward an existing open drainage channel along the northern boundary, and then conveys to an existing watercourse downstream to the east of the site.

The stormwater drainage management plan involves:

- Roof areas of Bunnings building will drain to rainwater tanks/harvesters for re-use. Water Tanks will overflow through a piped connection to pipe.

- Output of the collected stormwater from drainage pipe system to the combined detention and bioretention basins for treatment.
- Capture of stormwater from carpark areas by a convectional pit and pipe drainage network located in the carpark where required.
- Discharge from the catchment's outlets will be conveyed over land towards the existing waterways, or piped where required, generally similar to the discharge from the undeveloped catchments.

The pre and post-developed site conditions were modelled to establish the peak rate of discharge for each critical storm event from the 1 year to 100 year ARI events. The depth of water in basin was modelled in Drains for the 100 year ARI storm event was found to be 641.71m with a max volume of 498m³, therefore the detention volume 498m³ will be required. The location of the detention basin is illustrated on the development site plan at Figure 3 on the northern boundary of the development site.

4.4.4 What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway Determination?

No formal consultation with State and Commonwealth public authorities has been undertaken at this stage for this Planning Proposal. Consultation will occur in accordance with the conditions outlined in the Gateway Determination to be issued for this Planning Proposal. It is anticipated that the NSW Natural Resources Access Regulator (NRAR) and NSW Roads and Maritime Services (RMS) would be consulted in relation to this Planning Proposal.

5 Mapping

The proposal will involve amendments to the following LEP maps:

- Land Zoning Map – Sheet LZN_008A (refer to Appendix 2); and
- Lot Size Map – LSZ_008A (refer to Appendix 3)

6 Community Consultation

In accordance with Schedule 1, Part 1 (4) of the Environmental Planning and Assessment Act 1979, community consultation must be undertaken by the local authority prior to approval of the Planning Proposal.

Whilst the Gateway Determination will confirm the community consultation requirements, it is likely that if this Planning Proposal is supported, it would be classed as a “low impact” proposal in accordance with Section 5.5.2 of “A Guide to Preparing LEPs” that would require exhibition for a period of not less than 14 days.

A “low impact” proposal is defined as a “Planning Proposal that in the opinion of the planning authority making the Gateway determination is:

- consistent with the pattern of surrounding land use zones and/or land uses;
- consistent with the strategic planning framework;
- presents no issues with regard to infrastructure servicing;
- not a principal LEP; and
- does not reclassify public land.

It is evident in this report that the proposal satisfies the above criterion.

7 Timeframes

Table 3 provides a timeline which within the Planning Proposal could be completed:

Table 6: Timelines

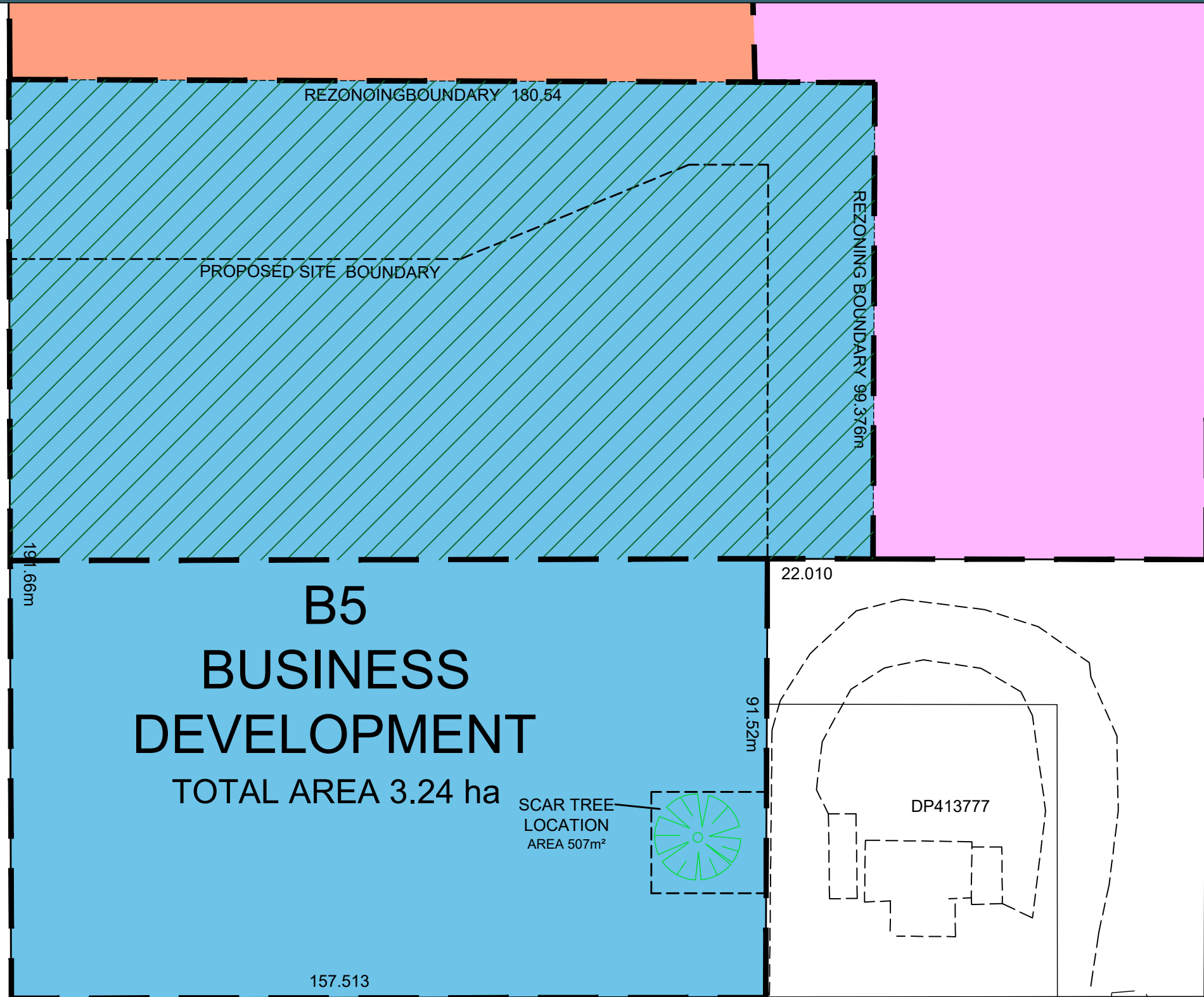
Project Timeline	Date
Anticipated commencement date (date of Gateway determination)	September 2020
Anticipated timeframe for the completion of required studies	December 2020
Timeframe for government agency consultation (pre and post exhibition as required by Gateway Determination) (21 days)	February 2021
Commencement and completion dates for public exhibition period	February 2021
Dates for public hearing (if required)	N/A
Timeframe for consideration of submissions	March 2021
Timeframe for the consideration of a proposal post exhibition	April 2021
Anticipated date RPA will forward the plan to the department to be made (if not delegated)	May 2021
Anticipated date RPA will make the plan (if delegated)	June 2021
Anticipated date RPA will forward to the department for notification (if delegated)	June 2021

Appendix 1 – Site Area Proposed to be Subject to B5 Business Development





JARDINE ROAD

80.09

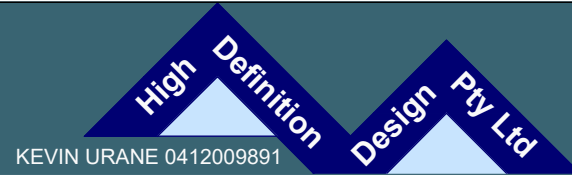


GWYDIR HIGHWAY

-  PROPOSED BUSINESS DEVELOPMENT B5 - 1.8 ha
-  EXISTING BUSINESS DEVELOPMENT B5 - 1.44ha

TITLE: PROPOSED BUNNINGS
 CORNER OF JARDINE ROAD AND GWYDIR HIGHWAY
 INVERELL, NSW

B5 BUSINESS DEVELOPMENT SITE



Date:	10.06.20	Scale:	1:1000 A3	Designed:	KU	Project No	HD139
Cad Ref:	HD139 r22					Drawing No	Revision
No	22	REZONING PLANS		KU	22.06.20	HD05	22
		Amendment		Drawn	Date		

Appendix 2 – Proposed New Land Zoning Map – Sheet LZN_008A



Inverell Local Environmental Plan 2012

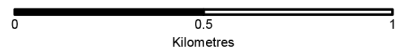
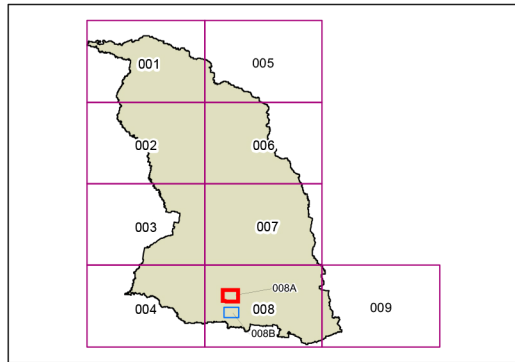
Land Zoning Map - Sheet LZN_008A

Zone

- B1 Neighbourhood Centre
- B2 Local Centre
- B5 Business Development
- E1 National Parks and Nature Reserves
- E3 Environmental Management
- E4 Environmental Living
- IN1 General Industrial
- R1 General Residential
- R5 Large Lot Residential
- RE1 Public Recreation
- RE2 Private Recreation
- RU1 Primary Production
- RU5 Village
- SP1 Special Activities
- SP2 Infrastructure

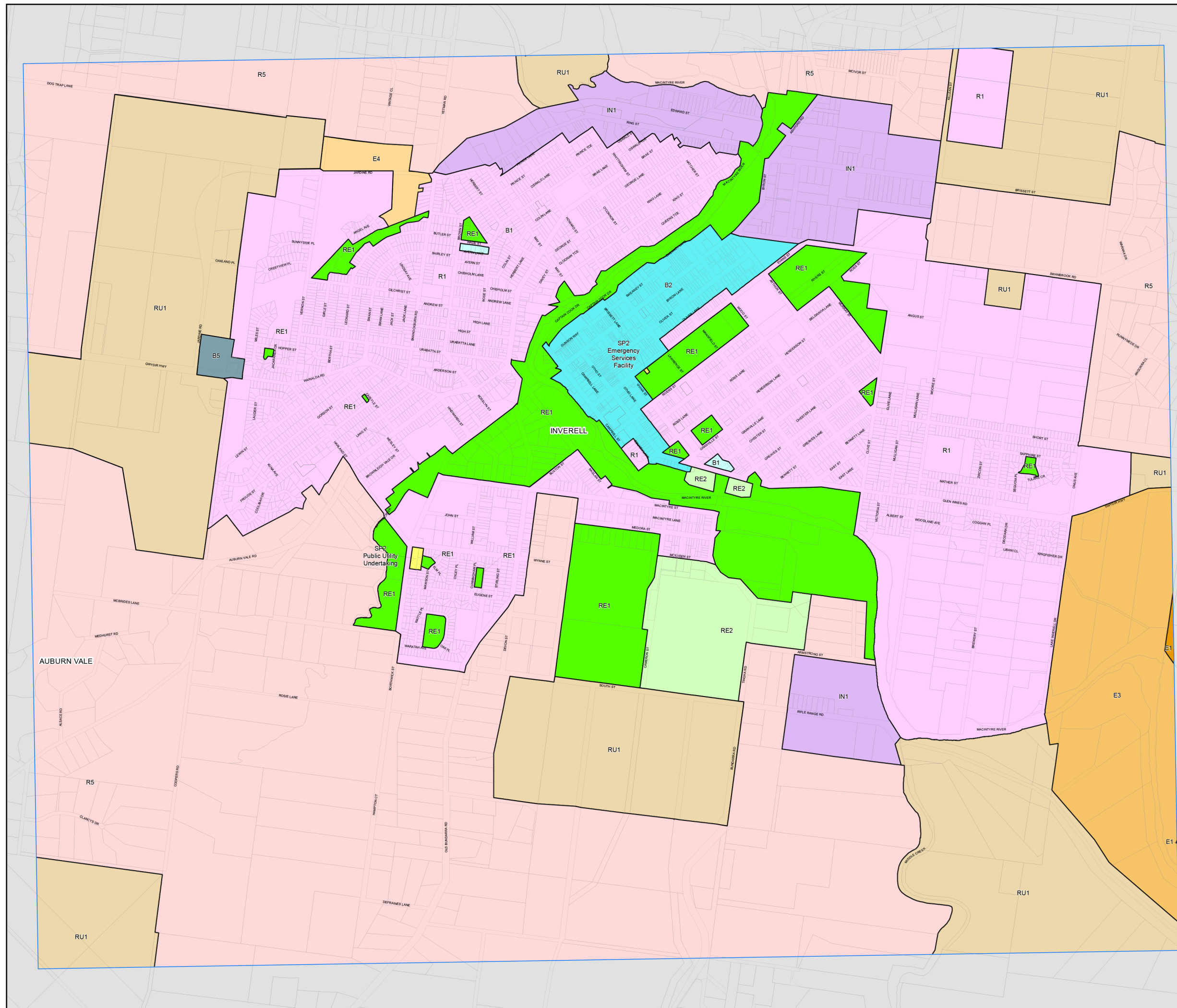
Cadastre

Base data 30/8/2012 ©
Land and Property Information (LPI)
Addendum data 30/08/2012 © Inverell



Projection: GDA 1994
Zone 56
Scale: 1:20,000 @ A3

Map Identification Number: 4200_COM_LZN_008A_020_20121023



**Appendix 3 – Proposed New Minimum Lot Size Map – Lot Size Map –
LSZ_008A**



Inverell Local Environmental Plan 2012

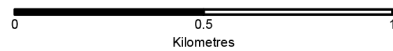
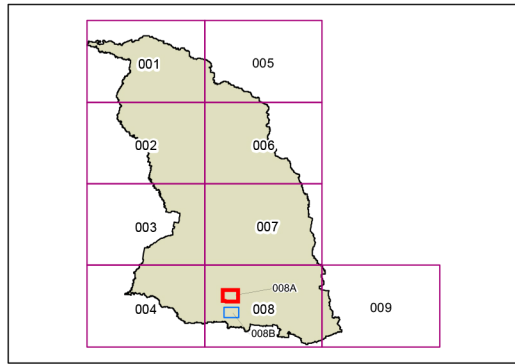
Lot Size Map - Sheet LSZ_008A

Minimum Lot Size (sq m)

- G 450
- V 2,000
- Y 1 ha
- Z 4 ha
- AB 40 ha
- AD 100 ha
- AE 200 ha

Cadastre

Base data 30/8/2012 ©
 Land and Property Information (LPI)
 Addendum data 30/08/2012 © Inverell



Projection: GDA 1994 Zone 56

Scale: 1:20,000 @ A3

Map Identification Number: 4200_COM_LSZ_008A_020_20121023

