

Planning Proposal

REZONING of land at 123 Taylor Road CHILCOTTS GRASS (Lot 2 DP1185561)

March 2020



Table of Contents

Part 1 - Objectives or Intended Outcomes.....	3
Site description and setting.....	3
Part 2 - Explanation of Provisions	6
Part 3 - Justification	6
Section A - Need for the Planning Proposal.....	6
Section B – Relationship to strategic planning framework.....	7
Section C – Environmental, social and economic impact.....	9
Section D – State and Commonwealth interests.....	15
Part 4 - Mapping	16
Part 5 - Community Consultation.....	20
Part 6 - Project Timeline.....	20
Part 7 – LEP Delegations.....	20
Conclusion	21

Part 1 - Objectives or Intended Outcomes

The objective of this planning proposal is to rezone the western section of 123 Taylor Road, Chilcotts Grass (Lot 2 DP1185561), from Zone RU1 Primary Production to part Zone R1 General Residential and part Zone E3 Environmental Management. The proposal is aimed at facilitating the future subdivision of the land for residential development and to protect the biodiversity values of the riparian environment.

The subject area is presently zoned RU1 Primary Production with a minimum lot size of 40ha in the Lismore Local Environmental Plan 2012, as shown on Figure 1 below. Land south of the site that is within Zone RE1 Public Recreation and Zone R1 General Residential is not part of this Planning Proposal.

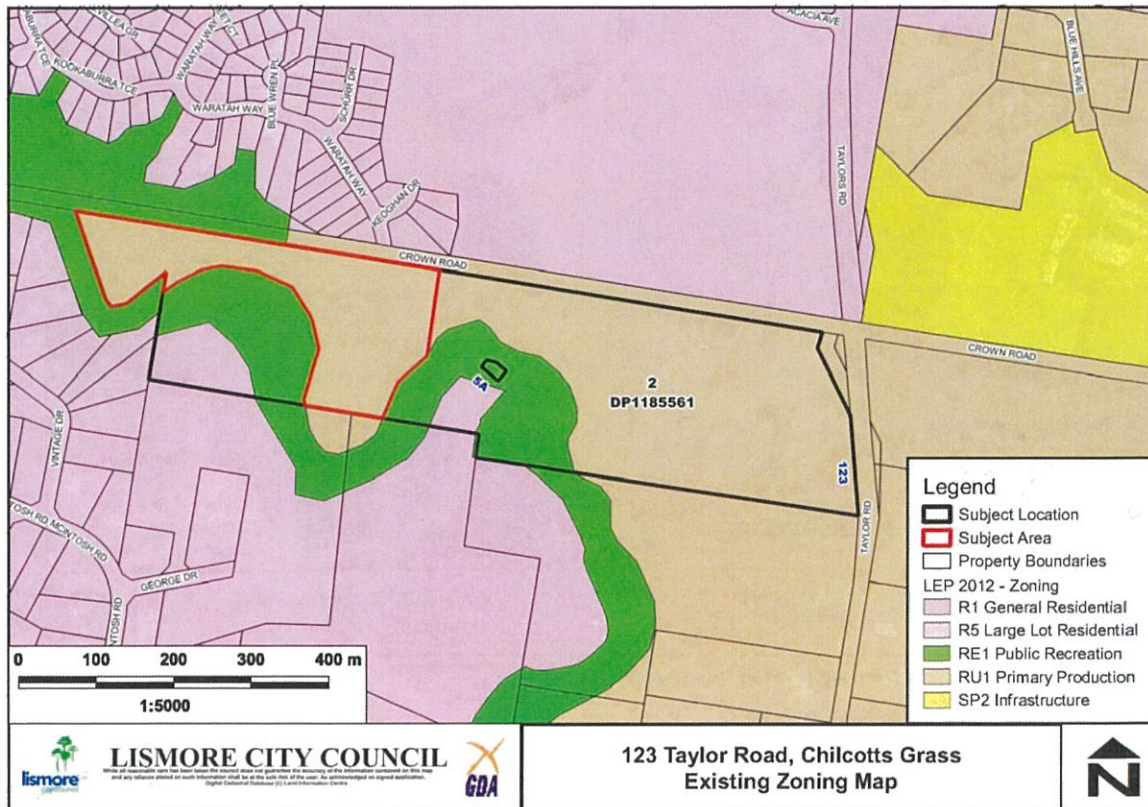


Figure 1: Current zones Lismore LEP 2012 – 123 Taylor Road, Chilcotts Grass

Site description and setting

The parcel of land is approximately 20.09 hectares and comprises a dwelling and various farm sheds. The land is currently used for grazing horses. The western part of the site proposed for rezoning is approximately 5.3 hectares. Of that area, the western part of the land and along the riparian zone of Tucki Tucki Creek comprises areas of closed forest consisting primarily of Camphor Laurel with planted eucalypts. The eastern section of this area is predominately cleared of native vegetation. The slope of the subject area varies from undulating to hilly (20-33%).

The site is located approximately seven (7) kilometres by road to Lismore's CBD which offers a high level of services and facilities commensurate to its status as a Regional City. Surrounding land uses include R1 zoned residential land with existing subdivision approvals to the north (Waterford Park) and south (Hidden valley Estate). There are existing residential

lots to the west, with RE1 zoned Public Recreation land (Tucki Tucki Creek), and RU1 land to the east used primarily for grazing.

The site is proposed to be serviced with reticulated water from Council Mains which currently terminates at the end of Waratah Way. Reticulated sewerage is present on the property and there is sufficient capacity to accommodate infill development. Preliminary assessment suggest that a gravity sewage service can service the proposed development. Overhead powerlines currently traverse the site.

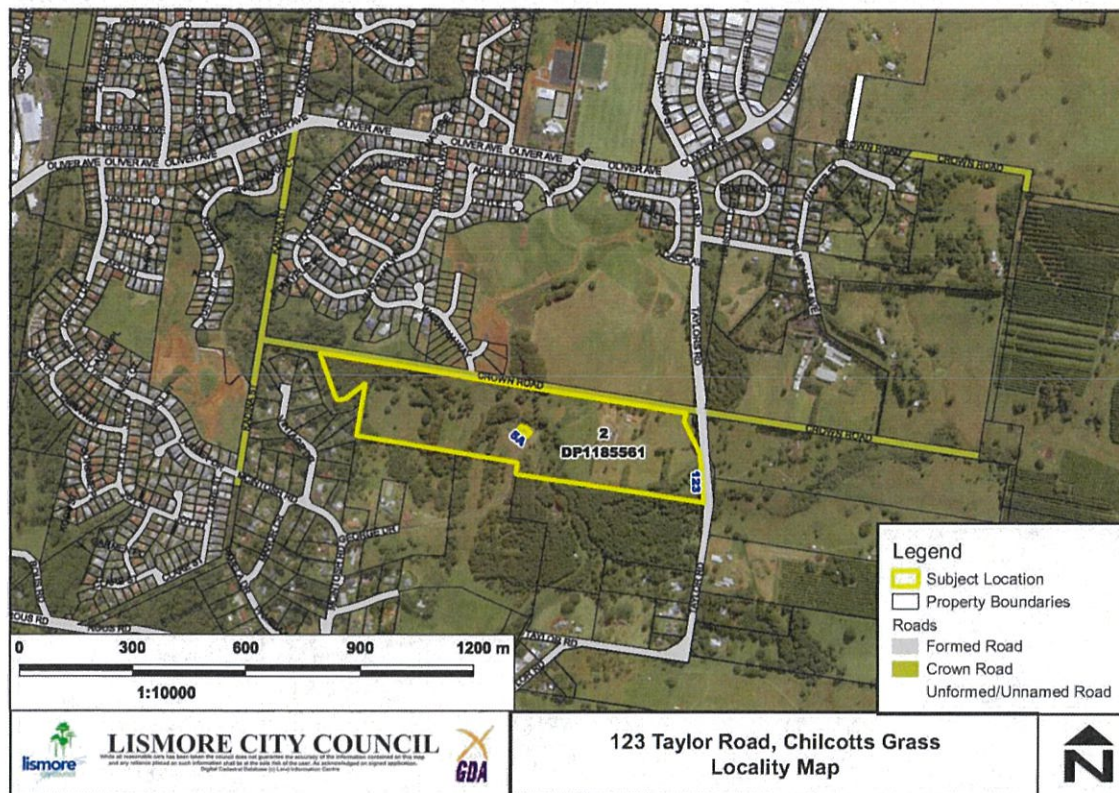


Figure 2: Aerial photograph of the site and locality



Figure 3: Mature vegetation along the southern end of the subject area.



Figure 4: A section of Tucki Tucki Creek.

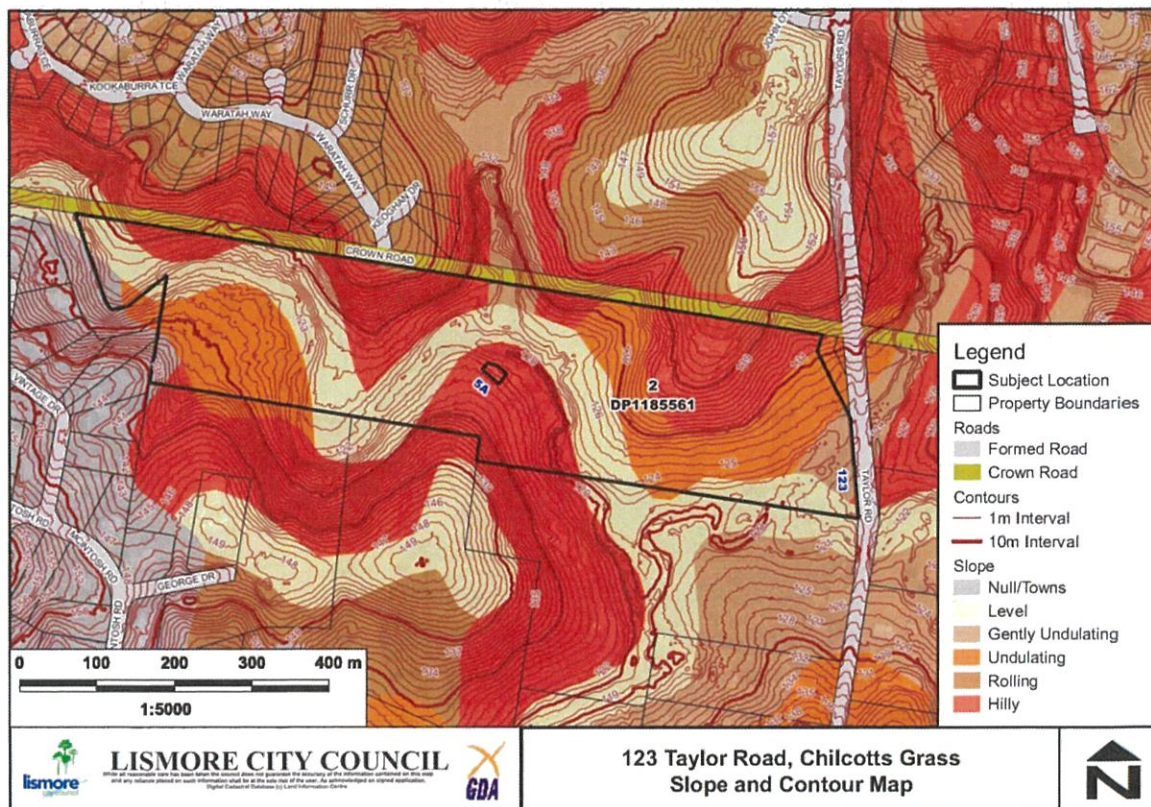


Figure 5: Slope of the land.

Part 2 - Explanation of Provisions

The objective of the proposal will be achieved by amending the Lismore Local Environmental Plan (LEP) 2012 to rezone part of 123 Taylor Road, Chillcotts Grass (Lot 2 DP1185561) from Zone RU1 Primary Production to part Zone R1 General Residential and part Zone E3 Environmental Management. The landowner has given consent to the application of the E zone. The Planning proposal will;

- Amend the **Land Zoning Map** to change part of the subject land from Zone RU1 Primary Production to Zone R1 General Residential and E3 Environmental Management.
- Amend the **Minimum Lot Size Map** for part of the land from 10ha to 600 m² for the area being rezoned to R1 and 2ha for the area being rezoned to E3.
- Amend the **Height of Building Map** for part of the land to provide for a building height of 8.5m.

Proposed mapping is provided in Part 4 of this report.

Part 3 - Justification

Section A - Need for the Planning Proposal

There is a need for the Planning Proposal to allow for the rezoning of the site from Zone RU1 Primary Production to Zone R1 General Residential. The North Coast Regional Plan 2036 states that the Lismore LGA will need a minimum of 3350 new dwellings by 2036 to meet anticipated population growth. The proposed rezoning will assist in meeting this demand for new residential land.

Q1. Is the planning proposal a result of any strategic study or report?

The Lismore Growth Management Strategy 2015-2035 (GMS) was adopted by Council at its Ordinary meeting on 12 May 2015 and identifies land preferred for development for residential and employment purposes.

The subject site is specifically identified and discussed in the GMS as an 'Urban Fringe Investigation' site. The GMS notes that the subdivision potential of the site is limited by steep topography and bushfire prone vegetation. It also notes that while the land is mapped as being State Significant farmland, there is little prospect of it being used for agriculture due to its proximity to existing and new housing.

Map 16 'Potential Residential Infill and Urban Fringe Sites' of the GMS clearly identifies the subject land as a 'potential urban site' area as shown in Figure 6. The GMS was conditionally approved by the Department of Planning and Environment on 11 August 2015.

The area proposed to be rezoned is identified as 'Investigation area – urban land' in the Urban Growth Area map for the Lismore LGA in the North Coast Regional Plan 2036.

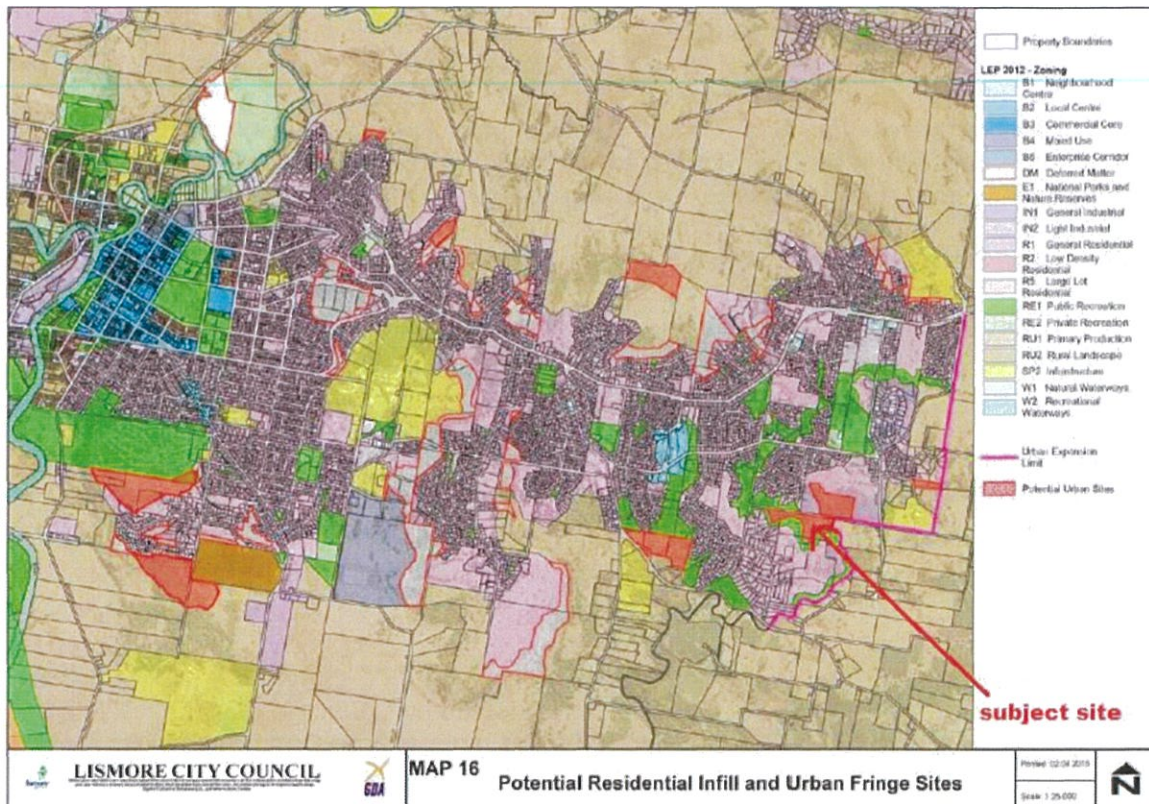


Figure 6: Lismore Growth Management Strategy (2015-2035) map showing the subject site.

Q2. Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

A planning proposal to change the zone to the R1 General Residential zone and an associated amendment of the Lot Size map and Building Height map is the best way to enable residential subdivision.

The current minimum lot size applying to the land is 40ha which precludes subdivision of the land and the provision of additional dwellings. Therefore, a change to the zoning and minimum lot size applying to the land is necessary to achieve the objectives and intended outcomes and the planning proposal is the only means to achieve this.

A change in zoning and minimum lot size to part of the land is consistent with Council's Growth Management Strategy and therefore is the most appropriate means of enabling the development of the land. The inclusion of the E3 zone along the riparian corridor of Tucki Tucki Creek is considered the best way of protecting and managing the ecological values of that part of the site.

Section B – Relationship to strategic planning framework

Q3. Is the planning proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy?

The North Coast Regional Plan (NCRP) is the current overarching State Government framework to sustainably manage growth for the Far North Coast and allocate further development of land for residential and employment purposes in appropriate locations.

The NCRP states that 'local growth management strategies will be prepared by councils to reflect the directions and actions contained in this Plan.' The planning proposal is consistent

with the goals and actions of the NCRP with regard to locating new housing in and around existing towns where essential services and road infrastructure has been established.

The NCRP also states that local Growth Management Strategies 'will be developed prior to preparing a local environmental plan to zone land for residential, rural residential, commercial and industrial land uses'. This proposal is consistent with the intent of the NCRP as the future subdivision and development of the site is compatible with Council's GMS that the State Government has approved.

The NCRP Urban Growth Area map for the Lismore Local Government Area shows the subject land as 'Investigation area – Urban Land' so the Planning Proposal is consistent with this strategy.

Q4. Is the planning proposal consistent with a council's local strategy or other local strategic plan?

The Planning Proposal is consistent with the following strategic planning documents:

- Imagine Lismore (Community Strategic Plan 2017-2027)
- Lismore Growth Management Strategy 2015-2035 (GMS)

Imagine Lismore (Community Strategic Plan) 2017-2027

Imagine Lismore 2017-2027 was developed and endorsed by Council in accordance with the *Local Government Act 1993*. The plan identifies the main priorities and aspirations for the future of the local government area for a period of at least 10 years.

The planning proposal is consistent with the following Imagine Lismore objectives and strategies:

- *Our land-use planning caters for all sectors of the community;*
- *Ensure land is available and serviced to meet population growth in locations that are accessible, close to services and employment, and suitable for development; and*
- *Ensure a diverse range of land use and development opportunities are available.*

Lismore Growth Management Strategy 2015-2035

The subject site is identified on Map 16 of the GMS as a 'Potential Residential Infill and Urban Fringe Sites' as shown in Figure 6.

Q5. Is the planning proposal consistent with applicable State Environmental Planning Policies?

The Planning Proposal is consistent with the requirements of the applicable State Environmental Planning Policies (SEPPs). An assessment against relevant SEPPs is provided at **Appendix 1**.

Q6. Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 directions)?

The proposal is consistent with applicable Section 9.1 Directions or any inconsistency can be justified. An assessment against the Ministerial Directions is provided at **Appendix 2**.

Section C – Environmental, social and economic impact

Q7. 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?

Koala and other threatened fauna habitat

The Biodiversity Assessment Report lists eight (8) candidate threatened fauna species having potential of occurring in the subject land, with only the koala known to occur.

The site is mapped as containing areas of primary koala habitat according to Council mapping as shown in Figure 7. Koalas were observed on site by the consulting ecologist from Land & Fire Assessments (L&FA) during survey work in areas not mapped as primary koala habitat. The L&FA ecologist has stated that the areas mapped do not support koala food trees but has identified established eucalypts further south along Tucki Tucki Creek that should be considered as 'preferred koala habitat' as shown in Figure 9.

A proportion of the mapped primary koala habitat area was cleared prior to the preliminary biodiversity assessment and is shown in the L&FA consultant's report as "since cleared vegetation" (see Figure 8). It was observed by Council staff at a site inspection that this land had been cleared and the matter was referred to the former Office of Environment and Heritage for further investigation.

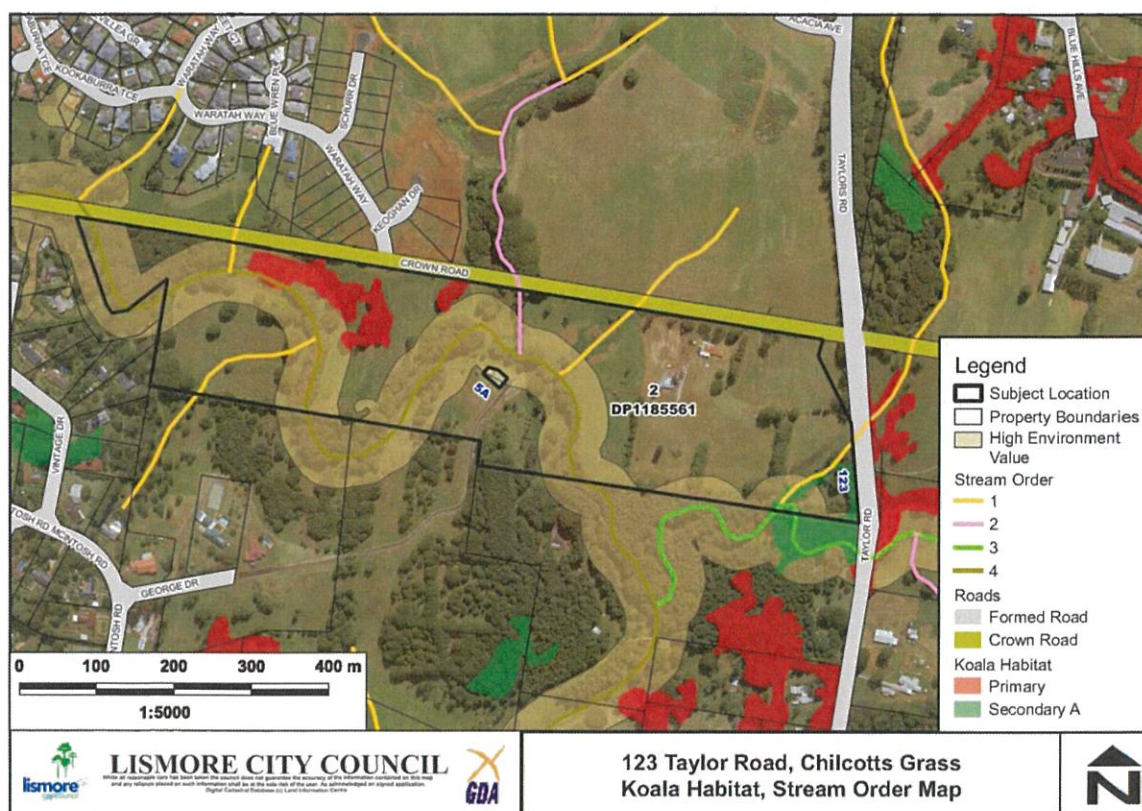


Figure 7: Council mapping showing koala habitat and areas of high environmental value.



LEGEND

 Subject Site	 Zone 4 - PCT 1302 Subtrop RF_Med
 Planning Proposal Area and Lot Layout	 Zone 5 - PCT 1302 Subtrop RF_Low
 VI Plots	 Since Cleared Vegetation
 Zone 1 - PCT 693 Blackbutt Tallowwood_Low	 Exotic Plantings
 Zone 2 - PCT 841 Forest Red Gum_Low	 Subtropical Lowland Rf TEC
 Zone 3 - PCT 1302 Subtrop RF_Good	

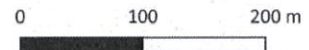


Figure 8: Vegetation Zones across the site as identified in Land and Fire Assessment's preliminary biodiversity assessment report.

LCC's ecologist advised that the koala is confirmed to utilise the site for breeding and foraging. To support a viable population of koalas, connectivity of habitat across the landscape is required to facilitate the safe movement and dispersal of the species throughout their lifecycle. The habitat on the subject site is important as it provides a stepping stone in the connectivity of koala habitat within the broader landscape. Koala habitat within the planning area is currently connected, however there is significant modification of koala habitat (loss and gain) due to development in the immediate and surrounding area of the subject site. The Planning Proposal identifies two trees to be removed to facilitate the extension of the road, (a Guioa and a Sweet Pittosporum), neither of which are koala food trees.

Any future DA would be considered against the criteria for a 'small impact development' in Lismore City Council's Comprehensive Koala Plan of Management (CKPoM) and mitigation measures have been proposed that could be included with any subsequent DA. These mitigation measures include;

- Lot layout and road design that maintains habitat linkages for the safe koala movement
- Bushfire asset protection zones that do not remove koala food trees
- The use of suitable designed boundary fences and suitable safety provisions for swimming pools

Under SEPP 44 and Lismore's CKPoM, any future development application for subdivision will be required to undertake a detailed koala habitat assessment report. Different assessment criteria apply for land verified as 'preferred koala habitat' and 'core koala habitat' and appropriate controls and conditions apply, including a restriction on title prohibiting the keeping of domestic dogs for areas identified as 'core koala habitat'.

The Planning Proposal will not directly impact on the existing koala habitat and a requirement for a 40m buffer from Tucki Tucki Creek will ensure that no building works can be undertaken in close proximity to the areas identified as koala habitat.

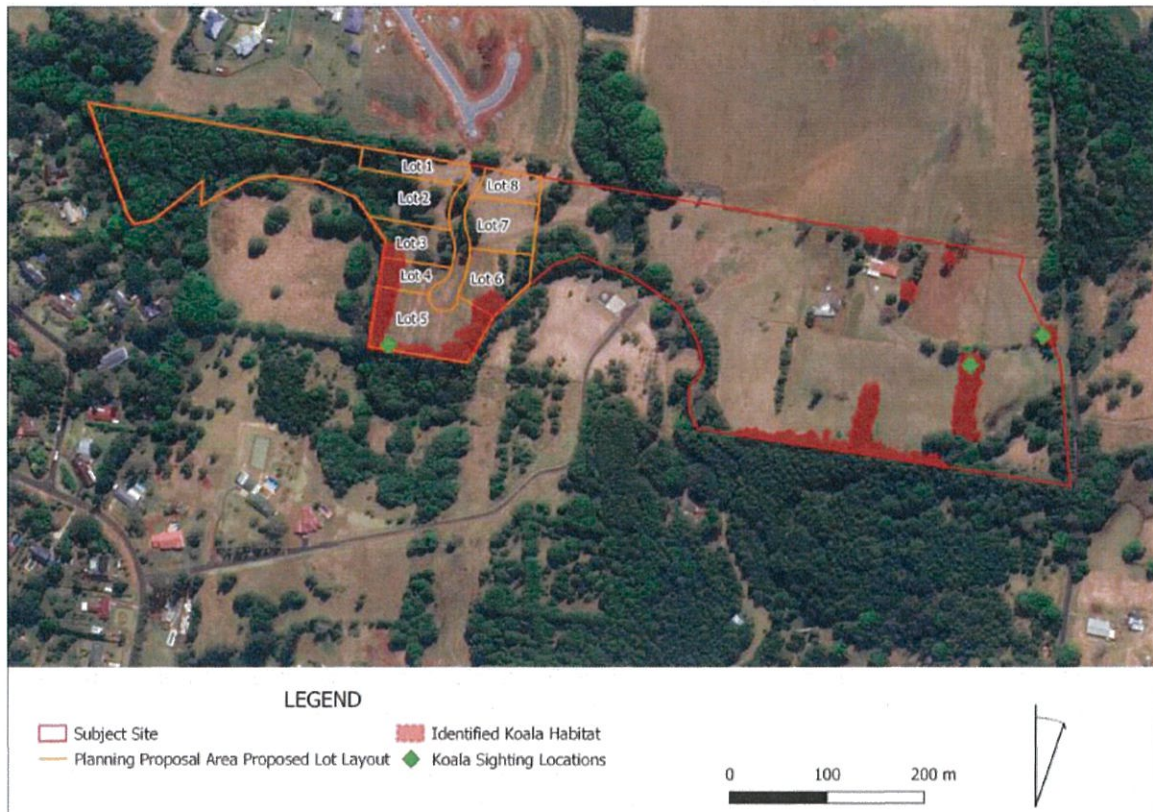


Figure 9: Field assessment of koala habitat locations and koala sightings by L&FA

No other threatened fauna was found within the site. A list of 'candidate credit species' was identified in the L&FA preliminary biodiversity assessment report that would need to be assessed to determine their presence or absence prior to any future residential development.

Threatened Flora / Vegetation Communities

No threatened flora species were detected during surveys conducted over a 4 day period in September 2018. Hairy Joint Grass (*Arthraxon hispidis*) was not detected within the subject area, however it is known to occur in the eastern portion of the on the subject land which is not part of this Planning Proposal.

The site does contain areas of Lowland Subtropical Rainforest Threatened Ecological Communities (TEC), with the largest and highest scoring patch occurring in the western part of the planning proposal area. LCC's ecologist made the following comments;

Although the patch meets the TEC criteria it is burdened with significant weed infestation, predominantly Camphor Laurel and Privet. The patch (Zone 4 in Figure 8) is demonstrating

reasonable resilience in that there is substantial recruitment of rainforest species in the understory.

Council's ecologist has assessed this area against the criteria for an E3 Environmental Management Zoning according to the Northern Councils E Zone Review Final Recommendations and determined that it meets the criteria as shown in Table 1 below;

Table 1: Zone E3 – Environmental Management Criteria

Department of Planning, Industry and Environment E3 Zone Criteria	Assessment
Riparian and estuarine vegetation and wetlands	The subject land is waterfront land as defined under the NSW Water management Act 2000 and is land comprising of riparian and estuarine vegetation on waterfront land.

It is considered that the application of Zone E3 to the area identified as Lowland Subtropical Rainforest TEC (Zone 4 in Figure 8) is an adequate negotiated planning outcome to ensure its ongoing protection and management. The landowner has given consent to the application of the E zone.

Q8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

Contaminated Land

A preliminary contaminated land assessment has been presented as supporting information to the planning proposal. Soil sampling was carried out in the development site and the results indicate that contaminants were below the Health Investigation levels (HIL) for residential development. The sampling regime however does not meet EPA guidelines in that sampling was not carried out in a systematic pattern. Systematic patterns are typically used for agricultural lands where contamination is expected to be fairly homogenous.

The information presented generally indicates that the site is suitable or can be made suitable for the proposed use, so no further technical reporting is required prior to a Gateway determination. At the sub-division DA stage, the matter of contamination will need to be revisited and additional technical reporting will be required to meet EPA Sampling Guidelines.

Bushfire

The site is mapped as containing bushfire prone vegetation as shown in Figure 10. The western part of the site is identified as Category 2 vegetation with some Category 1 to the north and east of the subject area and a large area of Vegetation Buffer in between. A preliminary assessment of bushfire hazard indicates that future development will be able to meet the requirements of Planning for Bushfire Protection 2006. As the site is mapped as bushfire prone land, the Planning Proposal will require referral to the NSW Rural Fire Service.

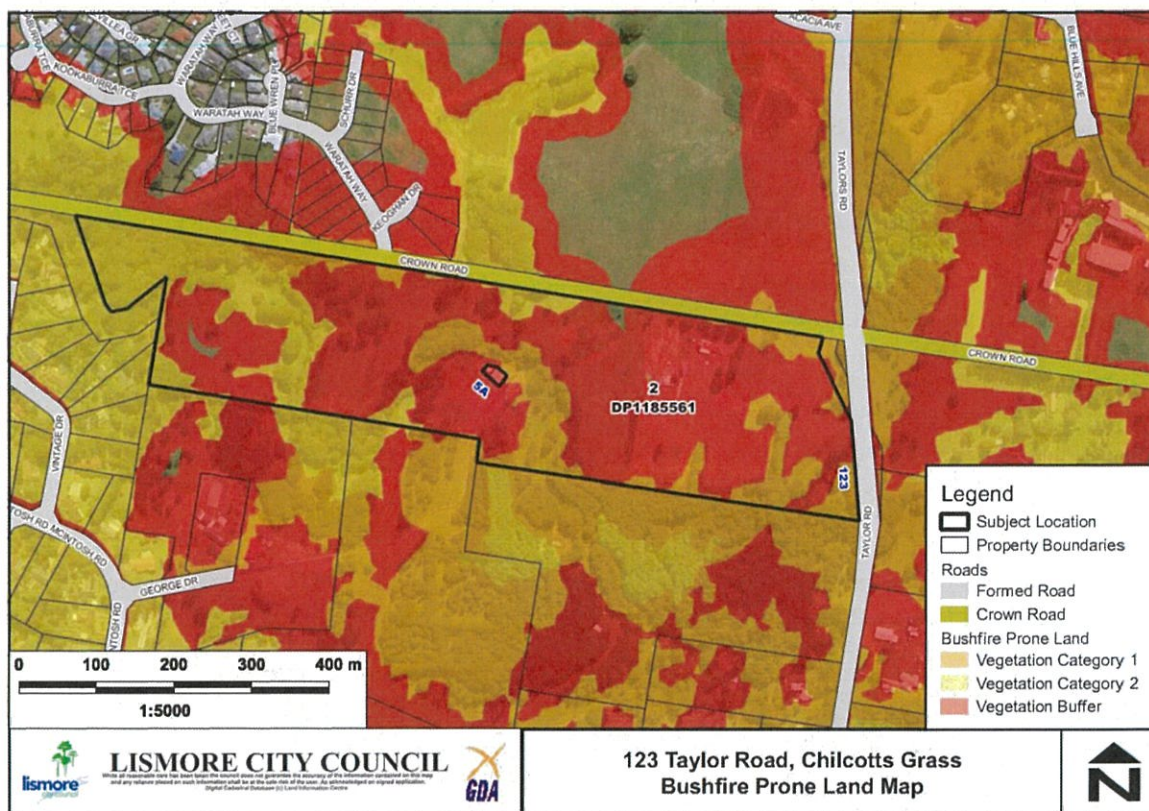


Figure 10: Bushfire prone land

Buffers to Watercourses

A preliminary enquiry was sent to the Natural Resource Access Regulator (NRAR) regarding buffer requirements to a fourth order stream (Tucki Tucki Creek). NRAR's guidelines for riparian corridors are that a 40m buffer should be maintained, measured from the high bank. NRAR commented that the 'indicative' lot layout provided shows physical works (ie. dwellings) could be located outside of the 40m buffer. Infrastructure (sewer) was indicated on the indicative lot layout to be within the 40m buffer, but this is consistent with the NRAR's guideline matrix that permits certain activities within the outer 50% of the buffer area.

NRAR noted that the indicative lot layout had several properties with direct access to Tucki Tucki Creek which is "undesirable" as it could lead to encroachment into the core riparian zone and would create additional Basic Landholder Rights (BLR) to extract water from the creek.

In consultation with the landowner, the Planning Proposal has been amended to include an E3 zone that provides for a 40m riparian buffer all the way along the western part of the subject area. The proposed R1 land will not have direct access to Tucki Tucki Creek as the creek line is within an area already zoned RE1 Public Recreation to be purchased by Lismore City Council. The land is part of 12.05 hectares identified as part of the Tucki Tucki Creek Acquisition and Embellishment plan within LCC's Section 94 Contributions Plan. The outcome is that no additional waterfront lots will be able to be created as a result of the Planning proposal.

State Significant Farmland

The area is mapped as being State Significant Farmland as shown in Figure 11. In regards to the potential commercial viability of nearby lands to undertake intensive plant agriculture (which would require a buffer of up to 150m in accordance with Council's DCP Chapter 11 on

Buffers), this is considered to be an unlikely scenario. Much of this land to the north and south has been zoned R1 General Residential and developed for urban residential development. The area to the east on the subject land has been cleared of a small area of macadamias (prior to 2015) and is currently used for grazing. Given the small amount of land available for intensive agriculture use and the existing residential zonings, it is considered unlikely that future intensive agriculture will be undertaken. No intensive agriculture is currently undertaken within 150m of the proposed rezoning. Therefore the potential for land use conflict between the proposed rezoning and existing and potential use of adjoining land is low and acceptable.

The Northern Rivers Farmland Protection Project (NRFPP) outlines principles whereby regionally significant farmland may be included in an urban settlement strategy. These principles were applied when the subject site was included within Lismore's GMS for 'potential residential infill and urban fringe sites' and the applicant has demonstrated the proposal is in keeping with these principles in that;

- the land is fragmented from contiguous agricultural use by Tucki Tucki Creek and land already development for urban residential use to the north and south
- the site is not suitable for commercial cultivation or horticulture due to the slope and proximity to a watercourse
- the proposal is minor in nature and there are no likely impacts on existing agricultural uses (which are limited to the eastern boundary)

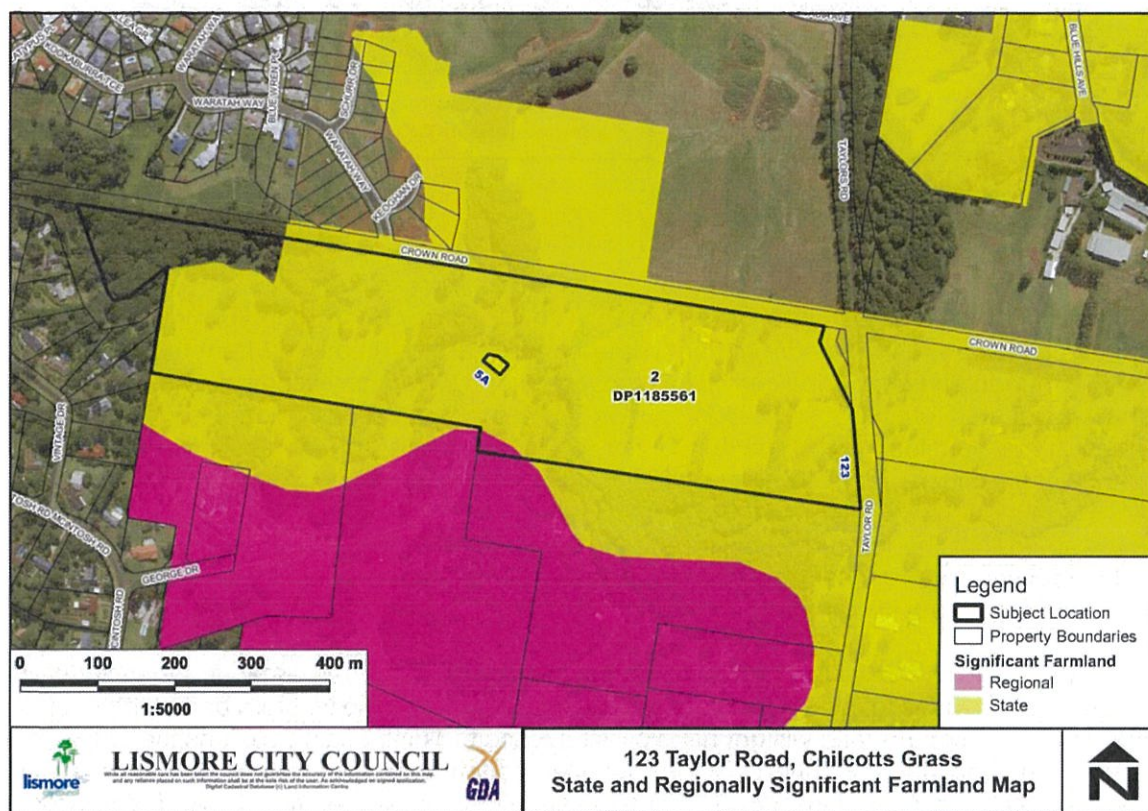


Figure 11: State and Regionally Significant Farmland.

Stormwater Management

Due to the scale of the rezoning, geographic location and scale of future road and drainage works, technical reporting in relation to the matter of stormwater quality can be reasonably considered at future subdivision stage. Given the proximity to Tucki Creek, any stormwater works within 40m of the creek will require referral to NRAR at the sub-division stage.

Q9. Has the planning proposal adequately addressed any social and economic effects?

Economic Impacts

The planning proposal will facilitate the development of up to eight (8) additional lots which is unlikely to create any adverse economic effects. There is likely to be some additional economic activity generated by development of the land and construction of future dwellings.

Social Impacts

Due to the nature and scale of the proposal there are not expected to be any adverse social impacts. A social impact assessment is not triggered by LCC's policy as the proposed rezoning will result in less than 20 dwellings. The provision of additional land for residential development will increase housing choice.

Aboriginal and European Cultural Heritage

A comprehensive report by Everick Heritage Consultants assessing the cultural heritage significance of the site was provided. It includes consultation with representative Aboriginal parties.

AHIMS record 04-4-0163 is located in the centre of the Project Area, being a grinding groove in the flow zone of Tucki Tucki Creek at its confluence with a tributary from the north. This registered site is NOT located within the Planning Proposal area – it is located further to the east - and the report concludes the following regarding this record:

- no evidence that a grinding groove of Aboriginal origin was present at this registered site;
- suggests record 04-4-0163 is located within allotments proposed for public reserves (RE1 zone);
- suggests record 04-4-0163 not within the urban investigation area and unlikely to be subject to impacts from development.

Whilst the report concludes that survey unit 1 be subject to additional investigation (subsurface test pitting), this area of the property falls outside of the Planning Proposal and that would remain Zone RU1. Any future planning proposal for this area would trigger the need to undertake this further investigation work as part of proposal assessment.

Other recommendations in the report relating to Aboriginal object find procedures should be included in any conditions of consent for any approved subdivision/ development application.

Section D – State and Commonwealth interests

Q10. Is there adequate public infrastructure for the planning proposal?

Water supply

Councils engineer has advised that the existing water main that terminates at Waratah Way can be extended to service the new development that would result from this rezoning.

Sewerage services

The proponent's preliminary assessment suggests that a gravity sewerage system can service the development and if required, a low pressure sewerage system can be incorporated into the development. This has been confirmed by Council's development engineer.

Education, Health and Emergency Services

The site is located approximately 7kms by road from the Lismore CBD and the Base Hospital and allied health services, various primary and secondary schools, Southern Cross University and emergency services.

Roads and Traffic

The site has a road access via an extension of Waratah Way. This proposal would formalise the completion of Waratah way and no further linkages are required for future public road access.

The Crown Road reserve to the north of the subject site will become superfluous to road network needs and it is recommended that it be amalgamated into the proposed rezoning area. The use of this Crown Road for public linkages and management of the Tucki Tucki Creek (RE1 Public Recreation areas) should be considered and a referral will be sent to the Crown Lands section of DoPIE following Gateway determination.

Q11. What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway determination?

A preliminary enquiry was sent to NRAR regarding access and buffers to a fourth order stream (Tucki Tucki Creek) which is discussed under Question 8.

It is recommended that the following authorities are consulted following the Gateway determination:

- Rural Fire Service
- Department of Primary Industries
- Biodiversity and Conservation Division (DoPIE)
- Natural Resource Access Regulator (Land and Water Division)
- Crown Lands

Part 4 - Mapping

Current zoning

The land within the subject area is currently in Zone RU1 Primary Production under the provisions of the Lismore Local Environmental Plan 2012. The land is also mapped on the Lot Size Map with a minimum lot size of 40ha. There is no maximum height of buildings that applies to the land.

Proposed land zoning, lot size and height of buildings

It is proposed to rezone part of the land from RU1 Primary Production to R1 General Residential zone and part of the land to E3 Environmental Management.

The change to the zoning map will require corresponding changes to the minimum lot size and height of building maps as shown in Figures 12-17 on the following pages.

This will be achieved by amending map sheets: LZN_006AB, LSZ_006AB and HOB_006AB.

No changes are required to the Lismore LEP 2012 written instrument.

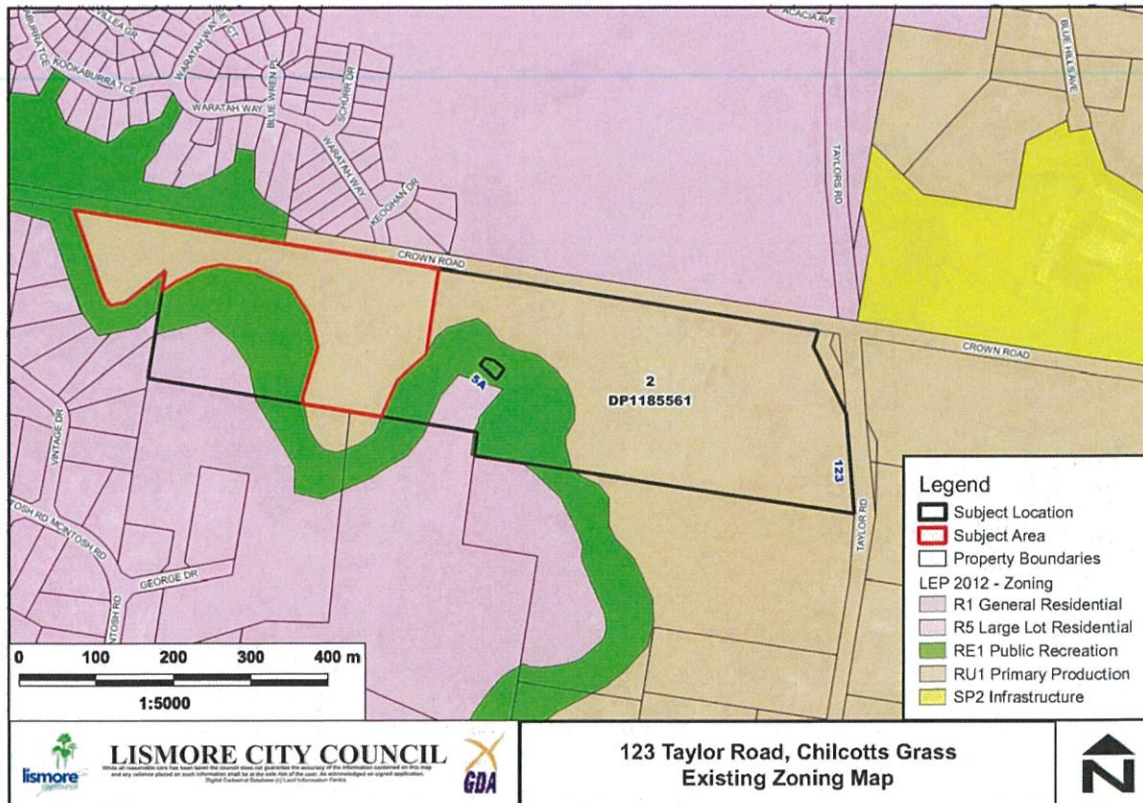


Figure 12: Existing Land Zoning

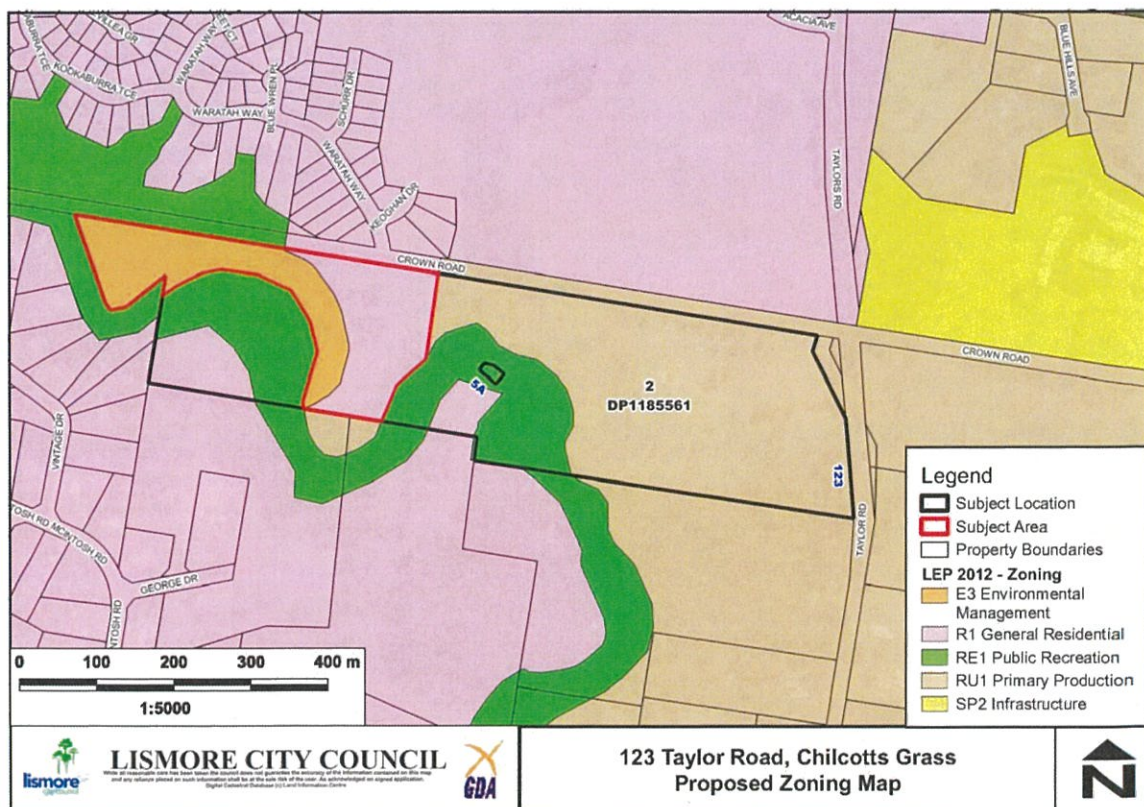


Figure 13: Proposed Land Zoning

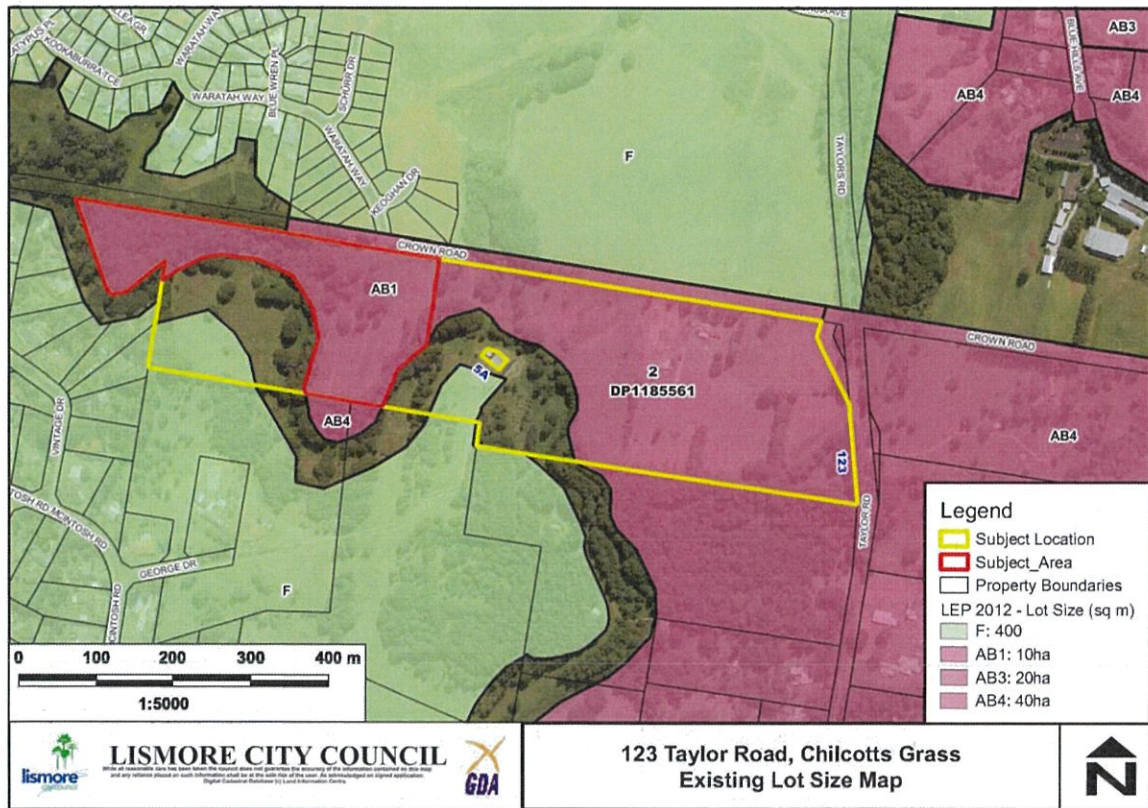


Figure 14: Existing Minimum Lot Size

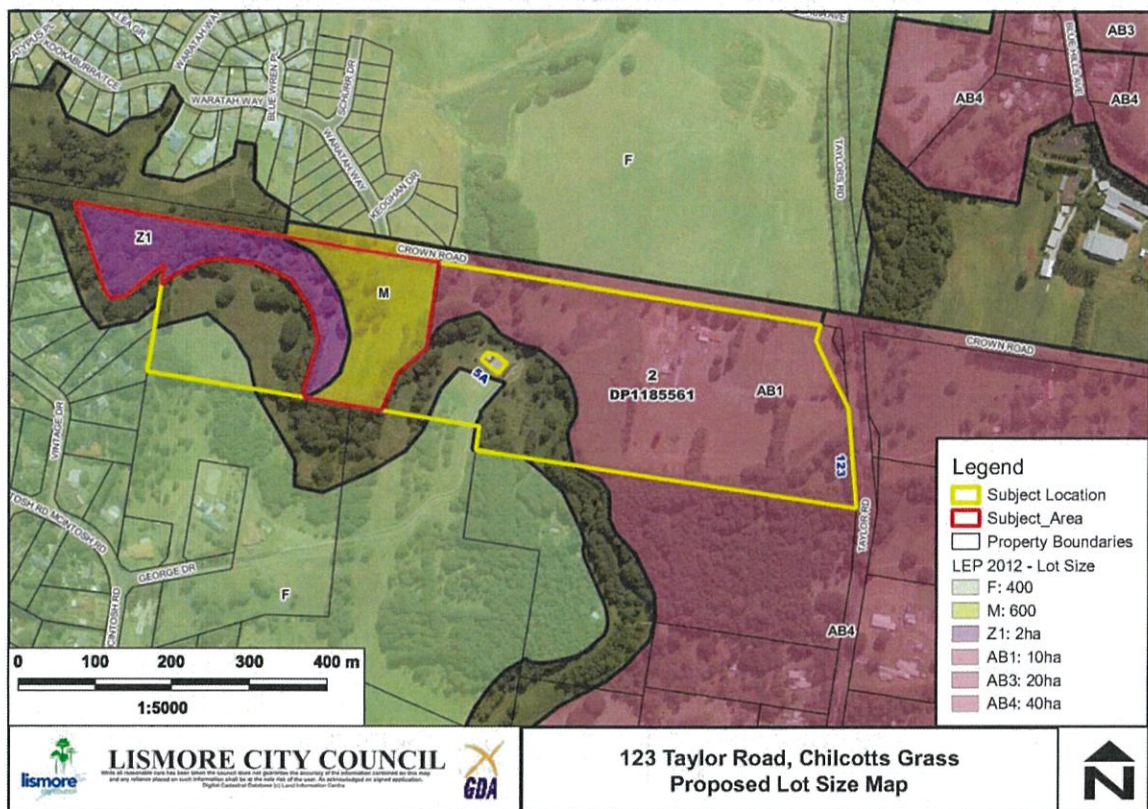


Figure 15: Proposed Minimum Lot Size

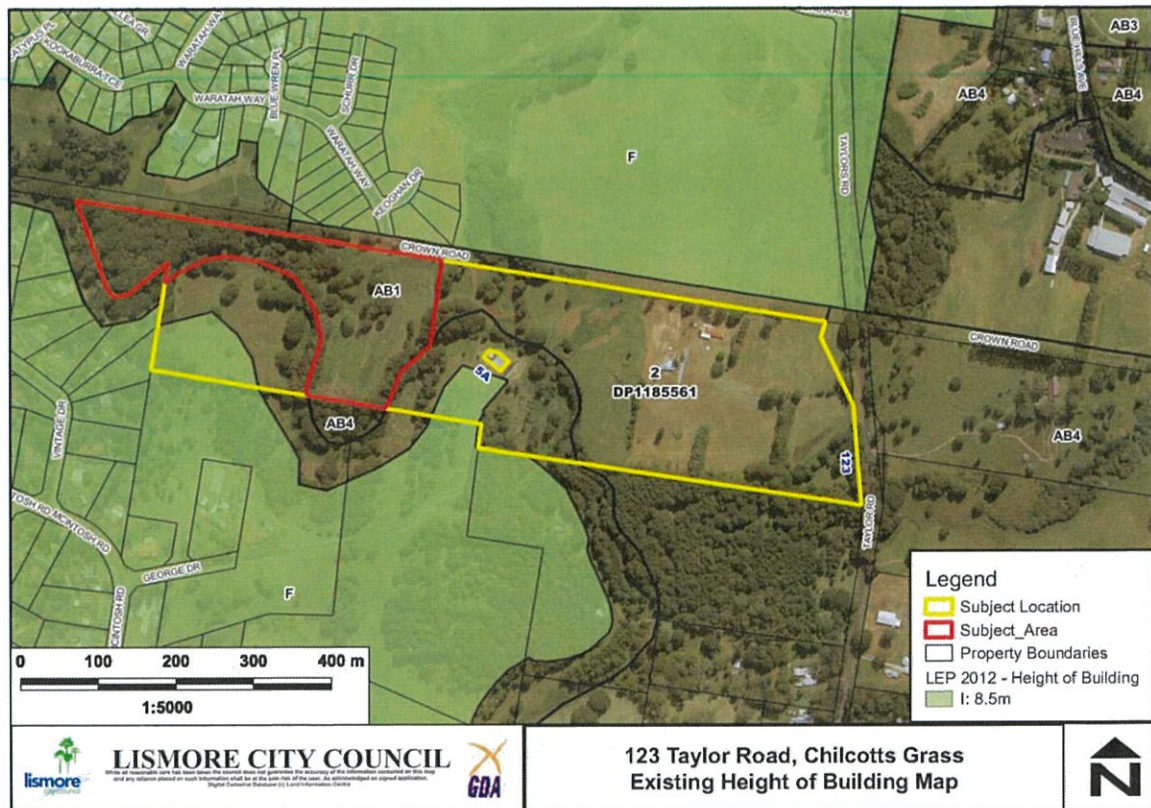


Figure 16: Existing Height of Buildings

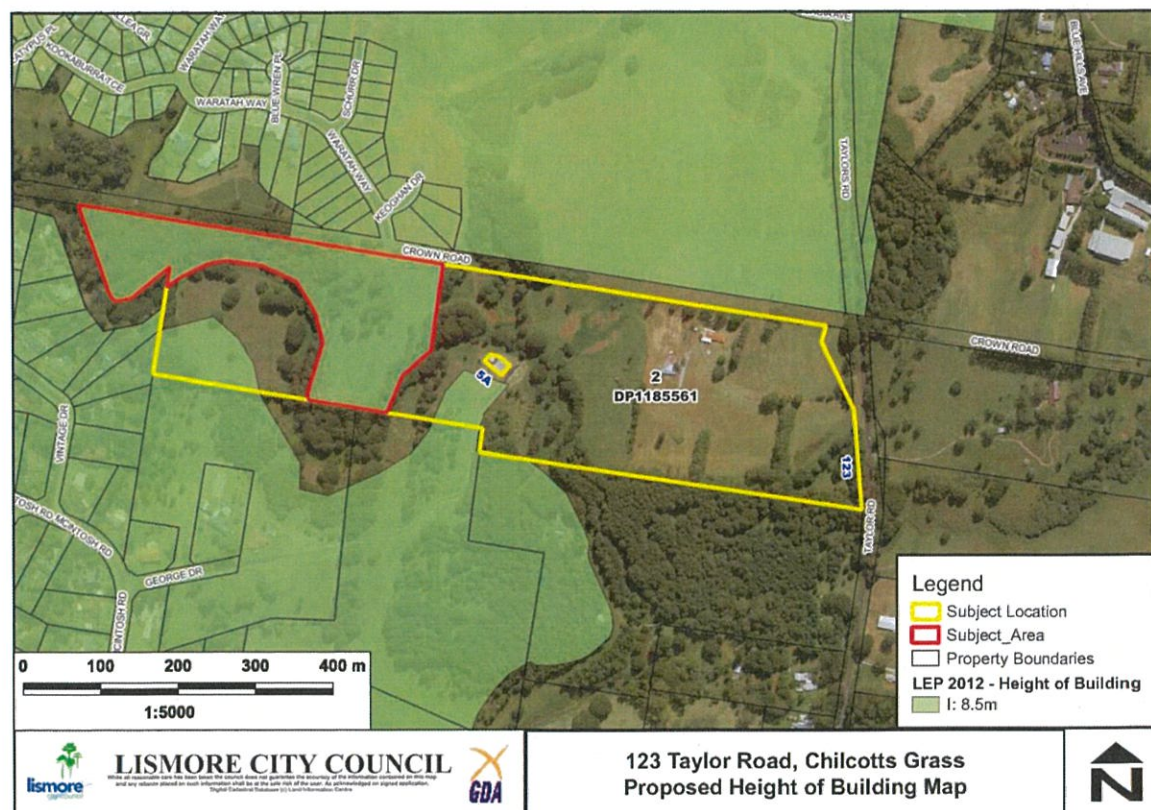


Figure 17: Proposed Height of Building

Part 5 - Community Consultation

Council will carry out consultation with the community following Gateway Determination. Council considers that a twenty-eight (28) day public exhibition period is appropriate.

Notification of the exhibited Planning Proposal will include:

- A newspaper advertisement (Local Matters) that circulates in the area affected by the Planning Proposal.
- The website of Lismore City Council and the Department of Planning, Industry and Environment.
- Letter to adjoining landholders.
- Referral to Ngulingah Local Aboriginal Land Council and the Friends of the Koala (FoK). FoK comment will be sought on any impacts this rezoning may have on koala movements and corridor locations and key habitat in the surrounding area.

The written notice will:

- Provide a brief description of the objectives or intended outcomes of the Planning Proposal.
- Indicate the land that is the subject of the Planning Proposal.
- State where and when the Planning Proposal can be inspected.
- Provide detail that will enable members of the community to make a submission.

Exhibition Material:

- The Planning Proposal, in the form approved for community consultation by the Director General of the Department of Planning, Industry and Environment.
- The Gateway Determination
- Any studies required as part of the Planning Proposal.

The Gateway Determination will confirm the public consultation requirements.

Part 6 - Project Timeline

It is anticipated that the planning proposal will be completed within the indicative timeline shown below:

- Report to Council – **March 2020**
- Gateway determination issued – **April 2020**
- Agency and public consultation – **May-June 2020**
- Consideration of submissions – **June-July 2020**
- Council consideration of the proposal post exhibition – **August 2020**
- Anticipated date of submission to the Department for notification of the making of the LEP – **September 2020**
- Anticipated date for plan making – **October 2020**

Part 7 – LEP Delegations

The Department of Planning and Environment wrote to Council on 1 March 2016 stating that Councils will not be issued authorisation to use the Minister's plan making functions for planning proposals which seek to apply an E zone.

Conclusion

The subject land has been identified in the Lismore Local GMS 2015-2035 as a potential urban site, and as an investigation area for urban land in the NCRP. A preliminary assessment of the Planning Proposal led to the refinement of the R1 General Residential area to the eastern part of the subject land and the inclusion of an area of E3 Environmental Management Zone in the western part. The landowner has given consent to the application of the E zone. The proposal is consistent with relevant State Environmental Planning Policies and s9.1 Ministerial Directions, or any inconsistency can be justified. There is sufficient information to enable Council to support the Planning Proposal and forward it to the Department of Planning, Industry and Environment for its consideration and response.

APPENDIX 1 Compliance with applicable State Environmental Planning Policies

State Environmental Planning Policy	Requirements	Compliance
SEPP 44 – Koala Habitat Protection	<p>3 Aims, objectives etc To encourage the proper conservation and management of areas of natural vegetation that provide habitat to koalas...</p> <p>(a) by requiring the preparation of plans of management before development consent can be granted in relation to areas of core koala habitat, and</p> <p>(b) by encouraging the identification of areas of core koala habitat, and</p> <p>(c) by encouraging the inclusion of areas of core koala habitat in environment protection zones.</p> <p>16 Preparation of local environmental studies The Director General may require that potential or core koala habitat not proposed for environmental protection zoning is the subject of an environmental study.</p>	<p>Consistent SEPP 44 would need to be considered at the development application stage, and in this regard, must be consistent with LCC's adopted Comprehensive Koala Plan of Management (CKPoM) for the south-east area of the Lismore LGA. The applicant has addressed the relevant sections of the CKPoM and recommendations and comments have been included at Part 3, Q7 within this report.</p>
SEPP 55 – Remediation of Land	<p>6 Contamination and remediation to be considered in zoning or rezoning proposal</p> <p>Council is required to consider whether the land is contaminated when rezoning for residential development.</p>	<p>Consistent. A preliminary contaminated land assessment has been prepared to support the planning proposal. Council's Environmental Health Officer has commented that the soil sampling carried out at the site did not meet NSW EPA sampling design guidelines in that sampling was not carried out in a systematic pattern. Results indicate that contaminants were below Health Investigation Levels for residential development.</p> <p>The information presented generally indicates the site is suitable or can be made suitable for the intended use.</p> <p>It is noted that post-Gateway and prior to any subdivision of the land, an amended technical report will be required to meet EPA sampling guidelines.</p>

State Environmental Planning Policy	Requirements	Compliance
SEPP (Affordable Rental Housing) 2009	No specific requirement regarding rezoning land.	Not applicable.
SEPP (Housing for Seniors or People with a Disability) 2004	No specific requirement regarding rezoning land.	Not applicable.
SEPP (Infrastructure) 2007	No specific requirement regarding rezoning land.	Not applicable.
SEPP (Coastal Management) 2018	Not applicable	The subject land is not affected by the Coastal Use or Coastal Environment area mapping or the Coastal Wetland and proximity area for coastal wetland mapping. The site is mapped as being State Significant Agricultural Land.
SEPP (Primary Production and Rural Development) 2019	3 Aims of Policy (a) to facilitate the orderly economic use and development of lands for primary production, (b) to reduce land use conflict and sterilisation of rural land (c) to identify State significant agricultural land (d) to simplify the regulatory process for smaller-scale low risk artificial waterbodies, and routine work in irrigation areas and districts, (e) to encourage sustainable agriculture, including sustainable aquaculture, (f) to consider effects of all proposed development in the State on oyster aquaculture, (g) to identify aquaculture that is to be treated as designated development.	Clause 11 of the SEPP says; <i>(1) Land is State significant agricultural land if it is listed in Schedule 1.</i> <i>(2) The provisions in Schedule 1 relating to the carrying out of development on State significant agricultural land have effect.</i> There are currently no areas or provisions listed in Schedule 1.
SEPP (Vegetation in Non-Rural Areas) 2017	3 Aims of Policy The aims of this Policy are: (a) to protect the biodiversity values of trees and other vegetation in non-rural areas of the State, and (b) to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation	No clearing of vegetation is proposed as part of the re-zoning. The clearing of two trees for the provision of a road and the thinning of some vegetation to comply with APZ requirements will be addressed at the subdivision DA stage.

APPENDIX 2 – Compliance with Section 9.1 Ministerial Directions

Ministerial Directions	Requirements	Compliance
1. Employment and Resources		
1.1 Business and Industrial Zones	Not applicable	Not applicable
1.2 Rural Zones	A Planning Proposal must not rezone land from a rural zone to a residential zone unless it is justified under clause 5 of the direction. Such justification includes the identification of the land in a strategy.	Consistent. The subject site is identified in the North Coast Regional Plan as 'Investigation area - urban land'. The site is also identified in the Lismore Growth Management Strategy 2015-2035 as a 'potential urban site'.
1.3 Mining Petroleum Production and Extractive Industries	This direction applies when the Planning Proposal: Has the effect of prohibiting mining of coal or other minerals, production of petroleum, or winning or obtaining extractive materials; Restricting the potential of State or regionally significant mineral resources	Not applicable. The Planning Proposal does not have the effect of prohibiting mining of coal or other minerals, production of petroleum, or winning or obtaining extractive materials. Pursuant to clause 7 <i>SEPP (Mining, Petroleum Production and Extractive Industries) 2007</i> , mining, petroleum production and extractive industries can occur where agriculture or industry may be carried out (with or without development consent). The land does not accommodate mineral resources or extractive materials which are of State or regional significance.
1.4 Oyster Aquaculture	Not applicable	Not applicable.
1.5 Rural Lands	This direction applies when: <ul style="list-style-type: none"> • The planning proposal effects land within an existing or proposed rural or environmental protection zone; • When changes are proposed to minimum lot size in a rural or environmental protection zone. The Planning Proposal must: <ul style="list-style-type: none"> • Be consistent with any applicable strategic plan; • Consider the significance of agriculture; • Identify and protect environmental values; • Consider the natural and physical constraints of the land; 	The land is currently zoned RU1 and changes are proposed to the minimum lot size, so this direction applies. The proposal is consistent with the Lismore Growth Management Strategy (2015-2035) and North Coast Regional Plan (2036) The site is identified as State Significant Farmland. However it is noted within the GMS that " <i>there is very little prospect of it being used for agriculture due to the proximity of existing and new housing</i> ". The land directly north is the Waterford Park residential estate and the land directly south has been re-zoned for future residential use. The small area of land is not considered viable for future agricultural activities. Areas of environmental value, specifically Lowland Subtropical Rainforest TEC have been identified and are proposed to be protected by

Ministerial Directions	Requirements	Compliance
		<p>the inclusion of an E3 zone in the western part of the site.</p> <p>The natural and physical constraints of the land have been assessed and addressed within this report.</p>
2. Environment and Heritage		
2.1 Environment Protection Zones	The Planning Proposal must include provisions that facilitate protection of environmentally sensitive areas. Must not reduce protection standards for environmental protection zones.	<p>An area of Lowland Subtropical Rainforest TEC is identified in the western part of the subject site. It is proposed to re-zone this area as E3 – Environmental Management. A recommendation from NRAR to create a 40m buffer along the riparian area of Tucki Tucki Creek and prohibit new lots with direct creek frontage has resulted in the E3 zone being applied.</p> <p>As the whole site is currently zoned RU1 – Primary Production, the proposed rezoning of this area will increase the level of environmental protection for the TEC and riparian corridor areas.</p>
2.2 Coastal Protection	Not applicable	Not applicable
2.3 Heritage Conservation	Planning proposal must incorporate provisions for conservation of European and Aboriginal heritage items or places.	<p>Consistent.</p> <p>Preliminary assessment through an AHIMS search and a review of Schedule 5 in the Lismore LEP 2012 indicates no items or places of Aboriginal or European heritage significance. A site inspection was undertaken by members of the Bundjalung Tribal Society and Ngulingah Local Aboriginal Land Council and no Indigenous cultural heritage sites or objects were identified.</p> <p>AHIMS record 04-4-0163 is located in the centre of the investigation area in a report prepared by Everick Heritage Consultants, being a grinding groove in the flow zone of Tucki Tucki Creek at its confluence with a tributary from the north. This registered site is NOT located within the Planning Proposal area</p>

Ministerial Directions	Requirements	Compliance
		<p>and the report concludes the following regarding this record:</p> <ul style="list-style-type: none"> • no evidence that a grinding groove of Aboriginal origin was present at this registered site • suggests record 04-4-0163 is located within allotments proposed for public reserves • suggests record 04-4-0163 not within the urban investigation area and unlikely to be subject to impacts from development.
2.4 Recreation Vehicle Areas	Not applicable	Not applicable
2.5 Application of E2 and E3 Zones and Environmental Overlays in Far North Coast LEPs	A planning proposal that introduces or alters an E2 or E3 zone or an overlay must apply zones and clauses consistent with the Northern Councils E Zone Review Final Recommendations	The proposed E3 area is consistent with the recommendations in the Northern Councils E Zone Review final report.
3. Housing, Infrastructure and Urban Development		
3.1 Residential Zones	<p>Where applicable a Planning Proposal must include provisions that encourage the provision of housing that will:</p> <ul style="list-style-type: none"> (a) Broaden the choice of housing types and locations. (b) Make efficient use of existing infrastructure and services. (c) Reduce consumption of land on the urban fringe. (d) Housing of good design. <p>In addition, a planning proposal must:</p> <ul style="list-style-type: none"> • Contain a requirement that residential development is not permitted until land is adequately serviced. • Not contain provisions that will reduce permissible residential density of land. 	<p>Consistent.</p> <p>A range of housing types will be permitted.</p> <p>The land is situated relatively close to the Lismore CBD and is serviced by existing infrastructure. The Planning Proposal will therefore make more efficient use of this infrastructure by facilitating increased development potential of the land.</p> <p>Lismore LEP 2012 contains provisions that require the provision of services prior to development consent for residential development.</p> <p>The planning proposal will not reduce the permissible residential density of the land; rather, it will increase it.</p> <p>The Planning Proposal is therefore consistent with this Direction.</p>

Ministerial Directions	Requirements	Compliance
3.2 Caravan Parks and Manufactured Home Estates	(a) Retain provisions that permit development of caravan parks. (b) Retain zonings of existing caravan parks. (c) Take into account principles for siting manufactured home estates.	Consistent. Caravan Parks and Manufactured Homes are permitted with consent in both the RU1 and R1 zones. Therefore there will be no change to provisions relating to this use.
3.3 Home Occupations	The Planning Proposal must permit home occupations in dwelling houses without development consent.	Consistent. Home occupations are permitted without development consent under LEP 2012 and SEPP (Exempt and Complying Development Codes) 2008. This planning proposal does not affect these provisions.
3.4 Integrating Land Use and Transport	The Planning Proposal must give effect to and be consistent with the aims, objectives and principles of: <ol style="list-style-type: none"> <i>Improving Transport Choice – Guidelines for planning and development</i> (DUAP 2001) <ul style="list-style-type: none"> better integrate land use and transport planning and development, provide transport choice and manage travel demand to improve the environment, accessibility and livability, reduce growth in the number and length of private car journeys, make walking, cycling and public transport use more attractive. <i>The Right Place for Business and Services – Planning Policy</i> (DUAP 2001) This policy aims to encourage a network of vibrant, accessible mixed use centres that are closely aligned with and accessible by public transport, walking and cycling. Objectives include: <ul style="list-style-type: none"> help reduce reliance on cars and moderate the demand for car travel encourage multi-purpose trips encourage people to travel on public transport, walk or cycle provide people with equitable and efficient access protect and maximise community investment in centres, and in transport infrastructure and facilities 	Consistent. The site has sufficient capacity to provide access to transport for residents. The site is adjacent to existing residential development, associated infrastructure and education, retail, recreation, medical, religious, sporting, trade and professional services. The proposed residential development will lead to increased car journeys. However, Waratah Way has been assessed as having the capacity to cater for this increase in traffic without any upgrades. The planning proposal will facilitate development that will access services and facilities in Lismore, and serve to reinforce the role and importance of this Regional City.

Ministerial Directions	Requirements	Compliance
	<ul style="list-style-type: none"> foster growth, competition, innovation and investment confidence in centres, 	
3.5 Development Near Licensed Aerodromes	Not applicable	Not applicable. The site is not in the vicinity of a licensed aerodrome.
3.6 Shooting Ranges	Not applicable	Not applicable. The site is not located adjacent to an existing shooting range.
4. Hazard and Risk		
4.1 Acid Sulfate Soils	Not applicable	Not applicable.
4.2 Mine Subsidence and Unstable Land	Applies to mine subsidence areas Applies to areas identified as unstable	Consistent. The land is not within a mine subsidence area. The site is not mapped as being unstable or prone to subsidence and displays no physical evidence of this. The planning proposal is therefore consistent with this Direction.
4.3 Flood Prone Land	Not applicable	Not applicable. The land is not prone to flooding.

Ministerial Directions	Requirements	Compliance
4.4 Planning for Bushfire Protection	<p>A Planning Proposal in bush fire prone land:</p> <ul style="list-style-type: none"> (a) Is to be referred to the Commissioner of the NSW Rural Fire Service following receipt of a gateway determination and prior to community consultation. (b) Have regard to Planning for Bush Fire Protection 2006. (c) Restrict inappropriate development from hazardous areas. (d) Ensure bush fire hazard reduction is not prohibited within the APZ. 	<p>Consistent.</p> <p>The subject site is mapped as bushfire prone land.</p> <p>A preliminary bush fire threat assessment was submitted with the planning proposal. This assessment found that the site can accommodate future development that will comply with the relevant provisions of Planning for Bushfire Protection 2006.</p> <p>Council is required under section 9.1 of the EP&A Act 1979, Ministerial Direction 4.4 to consult with the Commissioner of the NSW Rural Fire Service following receipt of a gateway determination and prior to undertaking community consultation in satisfaction of section 57 of the EP&A Act, and take into account any comments so made.</p> <p>Bush fire hazard reduction authorised under the <i>Rural Fires Act 1997</i> can be carried out on any land without development consent.</p> <p>The planning proposal is consistent with this Direction.</p>
5. Regional Planning		
5.1 Implementation of Regional Strategies	The Planning Proposal must be consistent with the Far North Coast Regional Strategy.	<p>Consistent.</p> <p>The North Coast Regional Plan Urban Growth Area Map identifies the site as 'Investigation Area – Urban Land'.</p> <p>This planning proposal is therefore consistent with the NCRP.</p>
5.2 Sydney Drinking Water Catchments	Not applicable	Not applicable
5.3 Farmland of State and Regional Significance on the NSW Far North Coast	<p>The Planning Proposal must not rezone land mapped as State or regionally significant farmland under the Northern Rivers Farmland Protection Project.</p> <p>The Direction does not apply to areas contained within a 'town and village growth boundary' in the Far North Coast Regional Strategy.</p>	<p>Consistent.</p> <p>The area is within the urban land investigation area within the North Coast Regional Plan (2036) and is identified as a potential residential infill / urban fringe site within Lismore's Growth management Strategy (2015-2025). Therefore this direction is considered not to apply, despite being mapped as state significant farmland.</p>
5.4 Commercial and Retail Development along the Pacific Highway, North Coast	Not applicable.	Not applicable.

Ministerial Directions	Requirements	Compliance
5.8 Second Sydney Airport: Badgerys Creek	Not applicable.	Not applicable.
6. Local Plan Making		
6.1 Approval and Referral Requirements	A Planning Proposal should not contain provisions requiring concurrence, consultation or referral of a Minister or public authority without approval from the relevant Minister or public authority; and the Director General of the Department of Planning. It must not identify development as designated development unless justified.	Consistent. The Planning Proposal does not introduce new concurrence, consultation or referral requirements. Nor does it propose new forms of designated development.
6.2 Reserving Land for Public Purposes	A Planning Proposal must not create, alter or reduce existing zonings or reservations of land for public purposes without approval of the relevant public authority and the Director General of the Department of Planning.	Consistent. This planning proposal does not affect public land.
6.3 Site Specific Provisions	A Planning Proposal to allow a particular land use (residential development) must rezone the site to an existing zone already applying to the LEP that allows the land use, without additional development standards to those already in use in that zone.	Consistent. The proposed Zone R1 General Residential is the most appropriate for future residential development on the land. No additional development standards are applied that are not already in use.
7. Metropolitan Planning – Not applicable		

ATTACHMENT 3 – North Coast Regional Plan 2036 Compliance Table

Action	Requirement	Compliance
Direction 1: Deliver environmentally sustainable growth		
1.1	Urban development in mapped areas.	N/A
1.2	Review mapped areas for high environmental value.	Areas of high environmental value are shown in Figure 7. As noted in Part 3 Q7 of this report, the applicant has questioned the mapping of koala habitat included in the OEH Biodiversity Values Map and has provided mapping showing areas of koala habitat further to the south along the riparian zone of Tucki Tucki Creek. (See Figure 8). The report provided by L&FA indicates the planning proposal is able to adequately address requirements for the protection of threatened species and TECs.
1.3	Identify residential, commercial or industrial uses in GMS.	Complies. The site is identified as potential residential infill / urban fringe within the GMS.

Action	Requirement	Compliance
1.4	Prepare land release criteria to assess appropriate locations for future urban growth.	Undertaken through the GMS investigations.
Direction 2: Enhance biodiversity, coastal and aquatic habitats, and water catchments		
2.1	Implement the 'avoid, minimise, offset' hierarchy to biodiversity.	The applicant has provided a proposed lot layout which demonstrates the only impact on existing vegetation to be the removal of two trees for the provision of a road access and the thinning of some vegetation to comply with APZ requirements. The rezoning will therefore avoid, minimise and offset any impact on biodiversity values.
2.2	Ensure local plans manage marine environments, water catchment areas and groundwater sources.	N/A
Direction 3: Manage natural hazards and climate change		
3.1	Reduce the risk from natural hazards by identifying, avoiding and managing	N/A
3.2	Review flood risk, bushfire and coastal management mapping.	Council's bushfire prone land mapping identifies the site as having vegetation in Category 1 and Category 2 and 'Vegetation Buffer'. The Planning Proposal will be referred to the Rural Fire Service for advice prior to public exhibition.
3.3	Use latest knowledge on regional climate projections for new urban development.	N/A
Direction 4: Promote renewable energy opportunities		
4.1	Identifying renewable energy resource precincts and infrastructure corridors.	N/A
4.2	Enable appropriate smaller-scale renewable energy projects	N/A
4.3	Promote appropriate smaller and community-scale renewable energy projects.	N/A
Direction 5: Strengthen communities of interest and cross-regional relationships		
5.1	Collaborate on regional and intra-regional housing and employment land delivery, and industry development.	N/A
5.2	Integrate cross-border land use planning between NSW and SE Qld.	N/A
5.2	Cooperation and land use planning between the City of Gold Coast and Tweed Shire Council.	N/A
5.4	Prepare a regional economic development strategy.	N/A
Direction 6: Develop successful centres of employment		
6.1	Facilitate economic activity around industry anchors by considering new infrastructure needs & encourage clusters of related activity.	N/A
6.2	Flexible planning controls, business park development opportunities and opportunities for start-up industries.	N/A
6.3	Reinforce centres through LGMS and LEP as primary mixed-use locations	N/A

Action	Requirement	Compliance
6.4	Focus commercial activities in existing centres; place-making focused planning	N/A
6.5	Appropriate mix of land uses; prevent encroachment of sensitive uses on employment land	N/A
6.6	Deliver employment land through LGMS and LEP	N/A
6.7	Ensure employment land delivery is maintained through an annual North Coast Housing and Land Monitor.	N/A
Direction 7: Coordinate the growth of regional cities		
7.1	Prepare action plans for regional cities	N/A
Direction 8: Promote the growth of tourism		
8.1	Facilitate appropriate large-scale tourism developments in prime tourism development areas.	N/A
8.2	Facilitate tourism and visitor accommodation and supporting land uses in coastal and rural hinterland locations through LGMS and LEP.	N/A
8.3	Prepare destination management plans or other tourism focused strategies.	N/A
8.4	Promote opportunities to expand visitation to regionally significant nature-based tourism places.	N/A
8.5	Preserve the region's existing tourist and visitor accommodation.	N/A
Direction 9: Strengthen regionally significant transport corridors		
9.1	Encouraging business and employment activities that leverage major transport connections.	N/A
9.2	Minimise impact of development on regionally significant transport infrastructure.	N/A
9.3	Ensure the effective management of the State and regional road network.	N/A
Direction 10: Facilitate air, rail and public transport infrastructure		
10.1	Deliver airport precinct plans that maximise potential of value-adding industries close to airports.	N/A
10.2	Consider airport-related employment/precincts that capitalise on future expanded Gold Coast Airport.	N/A
10.3	Protect the North Coast Rail Line and high-speed rail corridor.	N/A
10.4	Provide public transport where urban area has potential to generate sufficient demand.	N/A
10.5	Deliver a safe and efficient transport network to serve future release areas.	N/A
Direction 11: Protect and enhance productive agricultural lands		
11.1	Direct urban and rural residential development away from important farmland. Support existing and small-lot primary production.	The site is mapped as being State Significant Agricultural Land. However it is noted within the GMS that " <i>there is very little prospect of it being used for agriculture due</i>

Action	Requirement	Compliance
		<i>to the proximity of existing and new housing". The land directly north is the Waterford Park residential estate and the land directly south has been re-zoned for future residential use. The small area of land is not considered viable for future agricultural activities.</i>
11.2	Update the Northern Rivers Farmland Protection Project (2005).	N/A
11.3	Identify and protect intensive agriculture clusters in local plans.	N/A
11.4	Encourage commercial/tourist/recreation that complements/promotes agricultural sector.	N/A
11.5	Address sector-specific considerations for agricultural industries through local plans.	N/A
Direction 12: Grow agribusiness across the region		
12.1	Promote the expansion agribusiness in LGMS and LEPs.	N/A
12.2	Encourage the co-location of intensive primary industries and compatible processing activities.	N/A
12.3	Leverage proximity from the Gold Coast and Brisbane West Wellcamp airports for agribusiness.	N/A
12.4	Facilitate investment in the agricultural supply chain.	N/A
Direction 13: Sustainably manage natural resources		
13.1	Locate sensitive development eg residential away from region's natural mineral and forestry resources.	N/A
13.2	Plan for the ongoing use of lands with regionally significant construction material resources.	N/A
Direction 14: Provide great places to live and work		
14.1	Prepare precinct plans in growth areas or centres bypassed by the Pacific Highway. Establish appropriate zoning, development standards & S94.	N/A
14.2	Deliver precinct plans that are consistent with the Precinct Plan Guidelines (Appendix C).	N/A
Direction 15: Develop healthy, safe, socially engaged and well-connected communities		
15.1	Deliver guidelines for healthy built environments.	N/A
15.2	Facilitate more recreational walking and cycling paths.	N/A
15.3	Implement actions and invest in boating infrastructure priorities.	N/A
15.4	Create socially inclusive communities.	N/A
15.5	Deliver CPTED.	N/A
Direction 16: Collaborate and partner with Aboriginal communities		
16.1	Develop partnerships with Aboriginal communities to facilitate engagement during the planning process.	N/A

Action	Requirement	Compliance
16.2	Engage with Aboriginal communities with preparation of LGMS and LEP.	N/A
Direction 17: Increase the economic self-determination of Aboriginal communities		
17.1	Deliver opportunities to increase the economic independence of Aboriginal communities.	N/A
17.2	Foster closer cooperation with LALC.	N/A
17.3	Identify priority sites with economic development potential that LALC may wish to investigate.	N/A
Direction 18: Respect and protect the North Coast's Aboriginal Heritage		
18.1	Ensure Aboriginal objects and places are protected, managed and respected.	N/A
18.2	Undertake Aboriginal cultural heritage assessments to inform planning and development proposals.	N/A
18.3	Adopt appropriate measures in planning strategies and local plans to protect Aboriginal heritage.	N/A
18.4	Prepare maps to identify sites of Aboriginal heritage in 'investigation' areas to protect Aboriginal heritage.	N/A
Direction 19: Protect historic heritage		
19.1	Ensure best-practice guidelines are considered when assessing heritage significance.	N/A
19.2	Prepare, review and update heritage studies and include appropriate local planning controls.	N/A
19.3	Deliver the adaptive or sympathetic use of heritage items and assets.	N/A
Direction 20: Maintain the region's distinctive built character		
20.1	Development consistent with the North Coast Urban Design Guidelines (2009).	N/A
20.2	Review the North Coast Urban Design Guidelines (2009).	N/A
Direction 21: Coordinate local infrastructure delivery		
21.1	Undertake detailed infrastructure service planning to support proposals for new major release areas.	N/A
21.2	Maximise the cost-effective and efficient use of infrastructure.	The future development of the subject site is well located to utilise existing reticulated sewerage and water infrastructure.
Direction 22: Deliver greater housing supply		
22.1	Deliver an appropriate supply of residential land within LGMS and local plans.	This Planning Proposal is identified in the LGMS as 'Urban Infill / Fringe Investigation' so will result in the release of additional land zoned appropriately for residential development.
22.2	Facilitate housing and accommodation options for temporary residents.	N/A
22.3	Monitor the supply of residential land and housing through the North Coast Housing and Land Monitor.	N/A
Direction 23: Increase housing diversity and choice		

Action	Requirement	Compliance
23.1	Encourage housing diversity - target 40% of new housing as dual occupancies, apartments, townhouses, villas or dwellings on 400m ² , by 2036.	N/A
23.2	Develop LGMS to respond to changing housing needs and support initiatives for ageing in place.	N/A
Direction 24: Deliver well-planned rural residential housing areas		
24.1	Facilitate the delivery of well-planned rural residential housing areas.	N/A
24.2	Enable sustainable use of the region's sensitive coastal strip - new rural residential areas located outside the coastal strip, unless in LGMS	N/A
Direction 25: Deliver more opportunities for affordable housing		
25.1	Deliver more opportunities for affordable housing.	N/A
25.2	Prepare guidelines for local housing strategies to plan for local affordable housing needs.	N/A

