

# **PLANNING PROPOSAL**

Amendment to the Gunnedah Local Environmental Plan 2012

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## **Proposed Amendment to Gunnedah Local Environmental Plan 2012.**

**107-109 Chandos Street Gunnedah**

**Lots 15, 16, 17 & 19 of DP 758492**

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## PART 1: OBJECTIVES AND BACKGROUND

The objective of this planning proposal is to amend the Gunnedah Local Environmental Plan 2012 to make **Caravan parks** a permissible use within the subject land located at 107-109 Chandos Street, Gunnedah NSW.

The subject site and surrounding land have a history of residential and commercial development. The land is within the Namoi River flood area. The land is currently zoned RU1 Primary Production as a preventative measure for further residential and commercial development within the flood area. The current zoning permits broad acre agricultural activities and has a minimum lot size of 400 hectares. This is considered inconsistent with the surrounding land uses. The proposed recreational vehicle (RV) park is a low impact land use that can operate successfully within the flood zone.

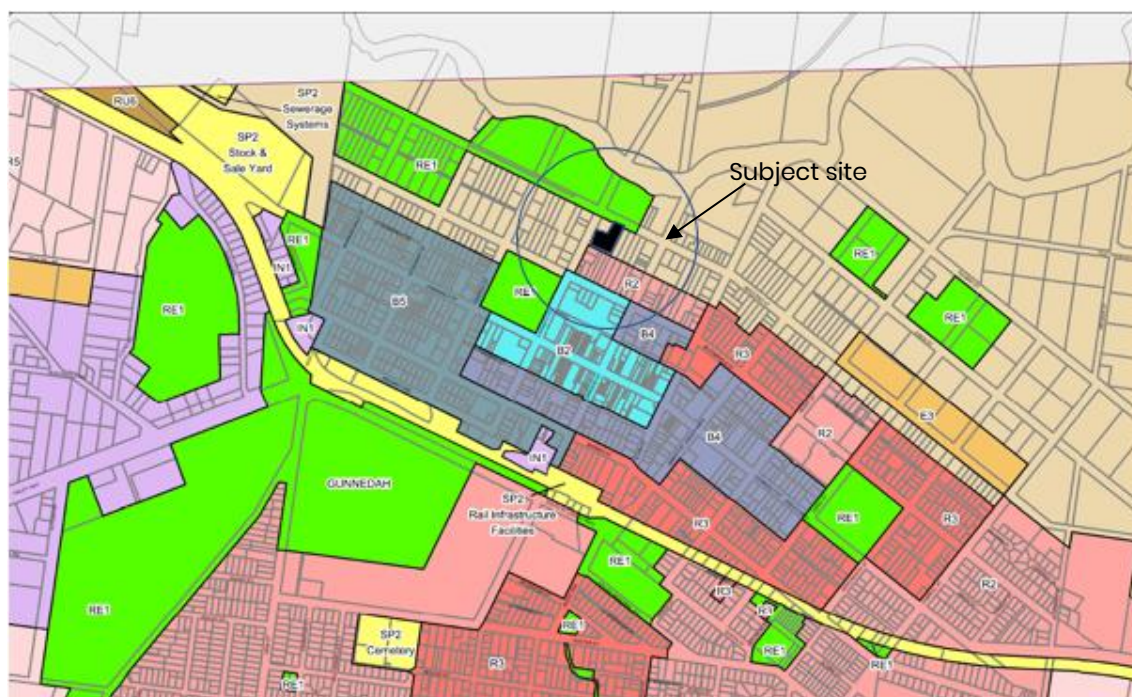
Currently, the RU1 Primary Production zone permits, with consent, the establishment of **camping grounds** but not caravan parks. The proposed use as a camping ground permits access by all recreational vehicle types except for caravans, which must use a caravan park. A CMCA RV park differs from a traditional caravan park in terms of the facilities provided and access is restricted to those vehicles that are fully self-contained. The proposed RV park supports all self-contained RVs including caravans, therefore there is a need to include **caravan park** as a permissible use within the subject land to allow the activity to be fully utilised.

This planning proposal intends to add one permissible land use (Caravan park) to the subject land only. Caravan park is a permissible use within the adjoining RE1, B4 and B5 zones.

A map showing the location of the subject land is provided in Figure 1.

The use of the land for the purposes of a self-contained RV park (defined as a caravan park) is not incompatible with land uses around the site and does not impact on the future use of the land in an agricultural context. The low impact development provides a compatible land use within the Namoi River flood area.

**Figure 1. – Locality Map**



## PART 2: EXPLANATION OF PROVISIONS

The use of land for the purpose of a Camping Ground is defined by the Standard Instrument as follows:

- **camping ground** means an area of land that has access to communal amenities and on which campervans or tents, annexes or other similar portable and lightweight temporary shelters are, or are to be, installed, erected or placed for short term use, but does not include a caravan park.

The use of the land for the purpose of a Caravan Park is defined by the Standard Instrument as follows:

- **caravan park** means land (including a camping ground) on which caravans (or caravans and other moveable dwellings) are, or are to be, installed or placed.

The proposed development of a self-contained RV park allows entry and camping by any recreational vehicle that contains its own fresh water and wastewater and provides its own eating and sleeping facilities. The definition of self-contained does not discriminate between the different types of recreational vehicles. The park will allow short term camping only and does not include permanent sites nor does it allow long term camping.

The purpose of this Planning Proposal is to allow the inclusion of caravans at the camping ground. By definition above, caravans are not permitted within a Camping Ground.

The *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005* defines both a caravan and a campervan as:

- **campervan** means a moveable dwelling (other than a caravan) that is designed so as to be capable of being registered (within the meaning of the Road Transport Act 2013) as a motor vehicle and includes a camper trailer.
- **caravan** means a moveable dwelling that is designed so as to be capable of being registered (within the meaning of the Road Transport Act 2013) as a trailer, but does not include a camper trailer.

Without a change in definitions to reflect the ability of caravans to be self-contained and therefore be able to stay within a camping ground, the only course of action available is to allow caravan parks as an additional permissible use within the subject land.

In order to achieve the objective of this planning proposal it is proposed to amend the Gunnedah Local Environmental Plan 2012 by the following:

Include Caravan park as an additional permitted use of the land in Schedule 1 of the Gunnedah LEP 2012 as follows:

- (1) *This clause applies to land at 107-109 Chandos Street Gunnedah, being lot 15 DP 758492, Lot 16 DP 758492, Lot 17 DP 758492 and Lot 19 DP 758492, in Zone RUI Primary Production.*
- (2) *Development for the purposes of a caravan park is permitted with development consent.*

## PART 3: JUSTIFICATION

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

- Section A: Need for proposal
- Section B: Policy Context
- Section C: Potential Environmental, Social and Economic Impact; and
- Section D: Other Government Interests

### SECTION A – NEED FOR THE PLANNING PROPOSAL

#### 1. Is the planning proposal the result of any strategic study?

The planning proposal is not the result of any strategic study or Local Strategic Planning Statement.

The planning proposal does support the planning priorities identified within the Local Strategic Planning Statement.

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

The proposal is considered the most appropriate means of achieving the intended outcome of allowing caravans to utilise this RV park.

One option would be to add Caravan parks as a permissible use to the RUI Primary Production Zone, however this would create the situation where caravan parks would be permissible within any land zoned RUI, which is not the intent of the zone.

The alternative way of achieving the objective of this planning proposal is to include Caravan parks as an additional permitted use of the land in Schedule 1 of the Gunnedah LEP 2012 for this specific parcel of lots. This option would limit the permissibility of this additional use to the subject site and eliminate any likelihood of development for the purposes of a Caravan park on other RUI zoned land throughout the Gunnedah Shire LGA.

In view of the above, including Caravan parks as a permissible use in the Schedule for this particular site is considered the preferred option to achieve the objectives of the planning proposal.

#### 3. Is there a community benefit?

The proposal will have a net community benefit (refer Appendix G) by providing greater options and choices in terms of visitor accommodation. By encouraging the low cost self-contained RV market to Gunnedah, it is increasing the number of visitors and the potential for local spending.

Given the specific RV market this proposal is targeting it is expected that this will increase total visitation to Gunnedah rather than dilute the existing visitation across more accommodation options. The park offers a discount to CMCA members, targeting a significant proportion of RV travellers who do not visit Gunnedah at present.

The site is close to the Gunnedah CBD, providing the linkage between camping and local retail spend. CMCA members spend on average \$770 per week whilst travelling, therefore the provision of a camping ground for self-contained RVs will provide significant economic benefit to the Gunnedah LGA. Based on analysis of CMCA RV park guests, park guests spend on average between \$127 and \$238 per RV per night (not including camping fees). This would provide a substantial economic benefit to local Gunnedah businesses.

The developer is seeking development consent for a camping ground for self-contained recreational vehicles only. The planning proposal will merely enable the camping ground on this site to accept all self-contained recreational vehicles, including caravans, rather than exclude caravans from the camping ground.

The land is currently vacant public (Gunnedah Shire Council) land that is maintained at the cost of the local ratepayers. The zoning and location within the Namoi River Flood Area restricts possible future development for residential or commercial purposes. Commercial investment on this land is unlikely given the site constraints. The proposed use as an RV park is considered a benefit to the local community due to utilisation of an otherwise vacant parcel of land, and a reduction in the area of land that council is required to maintain.

## SECTION B –RELATIONSHIP TO STRATEGIC PLANNING FRAMEWORK

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

It is noted that the *Gunnedah Urban Land Use Strategy 2016* reinforces the importance of agriculture to the regional economy. The 2016 strategy seeks to protect high value agricultural land from conflicting development or fragmentation. This proposal does not diminish the supply of agricultural land nor does it fragment that land because the subject site is located within a highly fragmented urban landscape.

Although not specifically identified within the Land Use Strategy, support of the local tourism industry is important to the viability of the local economy by providing economic diversity. The proposal is consistent with the strategic objective of improving the viability and vitality of the CBD. This is achieved through increased visitors and an expansion of the visitor economy.

### 2. Is the planning proposal consistent with the local Council's Community Strategic Plan, or other local strategic plan?

#### **Gunnedah Shire Local Strategic Planning Statement FUTURE 2040**

This strategy has been considered in the development of the Planning Proposal. The proposal is consistent with and supports the planning priorities of the Gunnedah Shire LSPS Future 2040 in terms of the following:

#### Local Planning Priority 3

*Grow Tourism* – “tourism contribution to the shire is comparatively lower than other LGA's in the New England North West region. Tourism is seen as a key opportunity for future growth. Passing traffic should be captured, at minimum as short-stay overnight visitors...”

“Low cost improvements can be investigated to enhance a variety of offerings around cultural, heritage, pastoral, mining, adventure and environmental themes by the construction of ancillary infrastructure such as rest areas for grey nomads.”

This proposal aims to support Local Planning Priority 3 through the provision of new RV accommodation which will meet a demand from the growing grey nomad and general road-based traveller cohort. There is limited appropriately zoned land within the Gunnedah township that suits this type of development, hence the need to include *caravan park* as a permissible use within this site to allow the investment and development to occur.

The proposal supports expansion of the local visitor economy through expansion of the range of accommodation options within Gunnedah. The location of the site specifically aims to encourage connectivity between park guests and the local retail centre of Gunnedah, increasing the length of stay and spend per night.

This proposal provides a low cost alternative for the local council because the investment is being made by a third party. This is in terms of both development of the site and operation of the RV park.

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## **Gunnedah Community Strategic Plan**

The planning proposal is consistent with the *Gunnedah Community Strategic Plan Aspirational Goal* of “Building our Shire’s Economy”.

The Outcome that aligns with this is:

2.3 “Increased tourism and promotion of the Gunnedah Shire” and strategies to achieve this:

2.3.2 “Provide accessible and welcoming areas for all travellers to stop, including caravans and recreational vehicles”

2.3.6 “Offer appropriate accommodation options...”

As per 2.3.2 and 2.3.6 above, the development will provide accommodation options for the travelling public through the development of low cost camping for self-contained recreational vehicles. The proposal will provide up to an extra 40 accommodation sites for visitors to the town and region. This option is not available at present, with recreational vehicles options limited to the showground or caravan park.

Those in self-contained vehicles do not always need the facilities provided at traditional caravan parks, and are seeking safe sites to park with minimal facilities at a commensurate low cost. This development will reduce the incidence of unregulated or illegal camping within the town.

The park includes a local and regional tourism sign to promote the region, and incorporates the opportunity for local businesses to promote their goods and services to the park guests. The park and Gunnedah in general will be promoted to CMCA membership through print and digital platforms and the park will be included on other public travel platforms as well.

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## **Gunnedah Koala Strategy 2015**

The planning proposal is consistent with the *Gunnedah Koala Strategy 2015*.

The subject site is within the strategy study area but less than 1 hectare in area. The subject site is not within any identified Koala habitat area and is identified as Urban Area within the Gunnedah Focus Area. Review of the Gunnedah Focus Area mapping confirms that the site is outside the Koala habitat areas identified.

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## **Gunnedah Rural Land Strategy 2007**

The planning proposal is consistent with the intent of the *Gunnedah Rural Land Strategy 2007* with regard to the following:

- The proposal does not seek to subdivide rural land
  - The site is outside the Namoi River riparian zone, but the development will maintain ground cover and not impact on the overland flow of flood waters through Gunnedah
  - No native vegetation is to be cleared because of the development
  - The site is within an urban setting and has no rural character to be maintained
  - The type of development will not sterilise the land for future agricultural use, although the land is already fragmented due to surrounding residential development
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## **Gunnedah Contributions Plan**

The Planning Proposal has considered the *Gunnedah Contributions Plan*, however the total development cost is below \$100,000 and therefore this plan does not apply.

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## **Gunnedah Open Space Strategy 2010**

The planning proposal is consistent with the *Gunnedah Open Space Strategy 2010* with regard to the following:

- The land is not identified as future open space recreation land
  - The activity will not sterilise the land for possible future use as recreation land if it is deemed strategically important to do so
  - The site is near to existing open space recreation land that can be utilised by park guests to improve their health and wellbeing
  - The site is not within any future residential development
  - The activity reduces the burden on council to maintain underutilised public land
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## **New England and North West Regional Plan 2023**

The Planning Proposal is consistent with the *New England North West Regional Plan 2023* through:

- Direction 7: Build strong economic centres
    - Action 7.2 – Focus retail and commercial activities in central business precincts and develop place-making focused planning strategies for centres.
      - Response: This proposal encourages local retail activity through the site's proximity to the Gunnedah retail centre
  - Direction 8: Expand tourism and visitor opportunities
    - Action 8 – Facilitate tourism and visitor accommodation and supporting land uses where appropriate through local growth management strategies and local plans.
      - Response: This proposal expands the visitor economy accommodation offering for Gunnedah and the New England North West, encourages park guests to experience local and regional visitor economy activities and creates linkages to the local Visitor Information Centre.
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Camping ground is already a permitted use within the zone. By including Caravan park as a permitted use within this site, this planning proposal seeks to allow all recreational vehicles to utilise the camping ground, rather than all recreational vehicles except caravans. Caravans represent 90% of the 711,00 registered recreational vehicles in Australia, so support of this planning proposal ensures that the Gunnedah region can access this significant segment of the RV market once the RV park is developed.

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

The State Environmental Planning Policies (SEPPs) that are relevant to this planning proposal are outlined below.

<b>Relevant SEPP</b>	<b>Consistency of Planning Proposal</b>
<i>SEPP No 21 – Caravan Parks</i>	The planning proposal is consistent with this SEPP in that the park is for short term tourist accommodation. The developer will seek consent from Gunnedah Shire Council for the operation of a caravan park.
<i>SEPP No 33 – Hazardous and Offensive Development</i>	The planning proposal does not involve any hazardous or offensive development activities.
<i>SEPP No 36 – Manufactured Home Estates</i>	The planning proposal does not trigger the consideration of this SEPP as the development is for short term accommodation only, with self-contained recreational vehicles only.
<i>SEPP No 55 – Remediation of Land</i>	The planning proposal does not trigger the need for any remediation or further investigation of land contamination as the additional land use to be permitted on the site is no more sensitive to land contamination than the uses currently permitted in the RUI zone
<i>SEPP No 62 – Sustainable Aquaculture</i>	The planning proposal does not trigger this SEPP because the proposal does not involve aquaculture
<i>SEPP No 64 – Advertising and Signage</i>	The planning proposal does not trigger this SEPP because it does not seek to change the signage already approved for the existing activity. No additional signage that is not already permissible under the current planning scheme is proposed as signage will be minor in scale and relates to the business activity.
<i>SEPP No 65 – Design Quality of Residential Apartment Development</i>	The planning proposal does not trigger this SEPP
<i>SEPP No 70 – Affordable Housing (Revised Schemes)</i>	The planning proposal does not trigger this SEPP
<i>SEPP (Aboriginal Land) 2019</i>	The planning proposal does not trigger this SEPP, the subject site is not within the mapped Aboriginal Land. A search using AHIMS Web Services (AWS) has confirmed that there are no known Aboriginal sites recorded in or near the site and no Aboriginal Places have been declared in or near the location (Appendix E).
<i>SEPP (Affordable rental housing) 2008</i>	The planning proposal does not trigger this SEPP. The development does not involve permanent housing and the flood prone land precludes housing development
<i>SEPP (Building Sustainability Index: BASIX) 2004</i>	The planning proposal does not trigger this SEPP as no habitable rooms are proposed.

<b>Relevant SEPP</b>	<b>Consistency of Planning Proposal</b>
<i>SEPP (Concurrences and Consents) 2018</i>	The planning proposal does not trigger this SEPP as it is not an integrated development
<i>SEPP (Educational Establishments and Child Care Facilities) 2017</i>	The planning proposal does not trigger this SEPP
<i>SEPP (Exempt and Complying Development Codes) 2008</i>	The planning proposal does not trigger this SEPP, a development application is required for the activity
<i>SEPP (Housing for Seniors or People with Disability) 2004</i>	The planning proposal does not trigger this SEPP
<i>SEPP (Infrastructure) 2007</i>	The planning proposal will access existing public infrastructure which is sufficient for the proposed development. The proposal also utilises idle surplus government land
<i>SEPP (Koala Habitat Protection) 2020</i>	The planning proposal does not trigger the need for further investigation because the subject site is less than 1 hectare in area, has been cleared of all trees and it is not within a core koala habitat
<i>SEPP (Mining, Petroleum Production and Extractive Industries) 2007</i>	The planning proposal does not trigger this SEPP as the development does not propose any mining or extractive industries, the development does not involve the prohibition of restriction of the development potential of the resources identified.
<i>SEPP (Primary Production and Rural Development) 2019</i>	The planning proposal does not trigger this SEPP as the development site is within an urban environment.
<i>SEPP (State and Regional Development) 2011</i>	The planning proposal does not trigger this SEPP, the development is not a State Significant or Regionally Significant development
<i>SEPP (State Significant Precinct) 2005</i>	The planning proposal does not trigger this SEPP, the development is not within a State Significant Precinct.

#### 4. Is the planning proposal consistent with applicable Ministerial Directions (s.9.1 Directions)?

Each s.9.1 Ministerial Direction is listed below with an annotation stating whether it is relevant to the Planning Proposal or not and confirming consistency.

<b>s.9.1 Direction Title</b>	<b>Applies</b>	<b>Consistency of Planning Proposal</b>
<i>1.1 Business and Industrial Zones</i>	NA	The Planning Proposal is located within the Rural Primary Production zone. In accordance with Clause 3 of the Direction, the Direction is not applicable.
<i>1.2 Rural Zones</i>	NA	The Planning Proposal does not propose to rezone or increase the permissible density of any rural zoned land. Therefore, in accordance with Clause 3 of the Direction, The Direction is not applicable.
<i>1.3 Mining, Petroleum Production and Extractive Industries</i>	NA	The Planning Proposal does not involve the prohibition or restriction, or the restriction of the development potential of the resources identified in clause 3(a)(b) of the Direction. The subject site is not affected by this Direction.
<i>1.4 Oyster Aquaculture</i>	NA	Not Applicable
<i>1.5 Rural Lands</i>	Yes	The existing provisions of the Gunnedah LEP 2012 allow for camping grounds to be established on this land. Accordingly, the proposal is considered to be consistent with Direction 1.5.
<i>2.1 Environment Protection Zones</i>	NA	The site is not within an environmentally sensitive area
<i>2.3 Heritage Conservation</i>	Yes	Existing provisions within the Gunnedah LEP 2012 relating to heritage conservation will continue to apply to the land subject to the planning proposal. Accordingly, the proposal is considered to be consistent with Direction 2.3.
<i>2.4 Recreation Vehicle Areas</i>	NA	The site is not within an environmental protection zone nor does it comprise a beach or a dune adjacent to or adjoining a beach.
<i>2.6 Remediation of Contaminated Land</i>	NA	To the best of the developer's knowledge, the site has been previously developed as residential land and is not subject to any previous contamination activities
<i>3.1 Residential Zones</i>	NA	The site is within a RUI Primary Production zone
<i>3.2 Caravan Parks and Manufactured Home Estates</i>	Yes	The planning proposal seeks to support the opportunity for a caravan park. There are limited alternative uses for the site given its location within a flood area and its primary production zoning
<i>3.3 Home Occupations</i>	NA	This proposal does not seek to provide dwelling houses
<i>3.4 Integrating Land Use and transport</i>	Yes	This planning proposal seeks to develop an RV park within easy pedestrian access to the main Gunnedah shopping precinct, reducing the need for guests to require vehicles to access the CBD.
<i>3.5 Development Near Licensed Aerodromes</i>	NA	Consultation with council staff confirms that the development will not infringe on the ILS for the Gunnedah Airport.

<b>s.9.1 Direction Title</b>	<b>Applies</b>	<b>Consistency of Planning Proposal</b>
<i>3.6 Shooting Ranges</i>	NA	The subject site is not adjacent to and/or adjoining an existing shooting range.
<i>4.1 Acid Sulfate Soils</i>	NA	The site is not within an identified Acid Sulfate soil affected area
<i>4.2 Mine Subsidence and Unstable Land</i>	NA	The site is not within a Mine Subsidence District
<i>4.3 Flood Prone Land</i>	Yes	<p>Consideration has been given to this Direction as the subject land is identified as being flood prone.</p> <p>The planning proposal will not result in an increased flood risk to development relative to that under the existing zoning of the land. The existing flood planning provisions of the Gunnedah Local Environmental Plan 2012 will not be affected by the proposal and will continue to apply to the land. Accordingly, the proposal is considered to be consistent with Direction 4.3.</p>
<i>4.4 Planning for Bushfire Protection</i>	NA	Not Applicable, the development site is not within the Bushfire Prone land or buffer zone.
<i>5.2 Sydney Drinking Water Catchments</i>	NA	Not Applicable, the site is not within the Sydney Drinking Water Catchment
<i>5.11 Development of Aboriginal Land Council Land</i>	NA	The land is not identified as that shown on the Land Application Map
<i>6.1 Approval and Referral Requirements</i>	NA	The planning proposal does not seek to require concurrence, consultation or referral to the Minister or other public authority
<i>6.2 Reserving Land for Public Purposes</i>	NA	The land is not reserved for future public purposes.
<i>6.3 Site Specific Provisions</i>	Yes	The planning proposal seeks to allow a land use on the relevant parcel of land within the existing zone. The proposed land use of a Caravan park is consistent with the current permitted land use of a Camping ground

## SECTION C – ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

### 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 planning proposal relates to land that is largely developed for urban purposes and comprises a range of land uses as well as cleared vacant land.

The planning proposal does not change the proposed use of the land and this use is not likely to have an adverse impact on critical habitat or threatened species, populations or ecological communities or their habitats. The site is devoid of trees and is within a residential context.

The proposed low impact use of the land will leave most of the site undisturbed. All undisturbed land within the site will be maintained as parkland, reflecting adjacent land uses.

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

The environmental impact of future development resulting from the planning proposal is unlikely to be any greater than that of development currently permitted in the RUI Primary Production zone. Furthermore, the potential environmental impact of the additional use to be permitted in the RUI Primary Production zone is no greater than that of the existing permitted use of a camping ground.

Stormwater will be managed through on-site absorption, with hardstand areas to drain to the existing public stormwater system where possible.

Overland flooding will be managed through an approved Park Emergency Management Plan. This plan allows for the removal of all RVs from the site prior to any flood event. The park will remain closed whilst the flood risk is apparent or until flood waters have receded. Proposed structures are designed to minimise the likelihood of creating any flood debris or diverting overland water flows.

The development will create minimal noise to neighbouring properties. The park guest demographic is the “grey nomad”. Visual amenity will be improved through landscaping and fencing.

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

This planning proposal will have positive social and economic impacts due to:

- Expanding accommodation options for the visitor economy within Gunnedah
- Providing low-cost camping options for a specific visitor economy market segment (self-contained recreational vehicles)
- Increasing retail spend within Gunnedah as a direct result of increased tourist numbers to the town
- The proposal will support economic diversification and support existing employment generating businesses.

The proximity of the development site to the Gunnedah CBD will support a greater level of engagement between park guests and retailers within the CBD. This will create the opportunity for greater spend per day for visitors.

Currently the land is vacant and underutilised. It requires ongoing maintenance by council as the owner, with no economic or community return. Future development of the site is limited due to its zoning and location within the flood area, therefore the intended use as an RV park will provide an economic return to the ratepayers for the land.

## SECTION D – COMMONWEALTH AND STATE INTERESTS

### 1. Is there adequate public infrastructure for the planning proposal?

The land subject to the planning proposal is serviced by adequate public infrastructure to meet the needs of existing and future development. The site is within a residential context with domestic water, sewer and electricity connections available to the site boundary. The development requires similar to a single domestic connection to operate.

The site is serviced by a local street with sufficient capacity to support this development.

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

Camping ground is a permitted use within the RUI Primary Production zone. This planning proposal seeks to add Caravan park to the permissible uses for the subject site only. This extra permitted use will allow the development to include caravans within the camping ground, but does not change the primary function of the development. For this reason, no State or Commonwealth public authorities have been consulted.

## PART 5: COMMUNITY CONSULTATION

Under Section 3.34(4) of the *Environmental Planning & Assessment Act (1979)*, before community consultation is undertaken the Director General of the DPI&E must approve the form of planning proposals to comply with the Gateway Determination. Should the planning proposal submitted be supported by DPI&E the draft plan will be placed on public exhibition in accordance with the department's guidelines. This will involve seeking further state agency, stakeholder, and general community feedback prior to being reported back to council.

It is suggested the planning proposal be advertised in the following manners:

- Advertised in local newspapers (Namoi Valley Independent and Northern Daily Leader),
- Displayed at Gunnedah Shire Council offices and on the council website.

## PART 6: PROJECT TIMELINE

The project timeline in respect of the planning proposal is provided below. The timeframe is indicative only and subject to change.

The anticipated timeframe for the proposed amendment to the Gunnedah Local Environmental Plan 2012 from submission of the proposal to NSW Planning and Environment to gazettal of the LEP amendment is provided below as a guide. The timeline commences from the formal report to Gunnedah Council.

- Gateway determination from report to council: 4-6 weeks
- Public Exhibition period: 4 weeks
- Consideration of formal submissions: 2-4 weeks
- Timeframe for consideration of proposals post exhibition: 2-4 weeks
- Date of submission to the Department to finalise LEP: 2-4 weeks

Action	Feb 2021	Mar 2021	Apr 2021	May 2021	Jun 2021	Jul 2021	Aug 2021
Gateway Determination	●						
Public Exhibition Period		●					
Consideration of Formal submissions			●				
Council report				●			
Department finalisation					●		
Gazettal					●		



## PART 7: CONCLUSION

The planning proposal seeks to include Caravan park as a permitted use within the RU1 Primary Production zone for this particular parcel of land only. The zone already permits camping grounds which allows for the establishment of the proposed recreational vehicle park, but specifically excludes caravans in the definition. The inclusion of caravans as a permitted recreational vehicle within the development site is consistent with the intent of the zone.

The inclusion of caravan park will not change the intended use of the land nor the operation of the business, other than to allow another market segment of vehicles to access and utilise the camping ground.

## APPENDIX A: MAPS AND PHOTOS

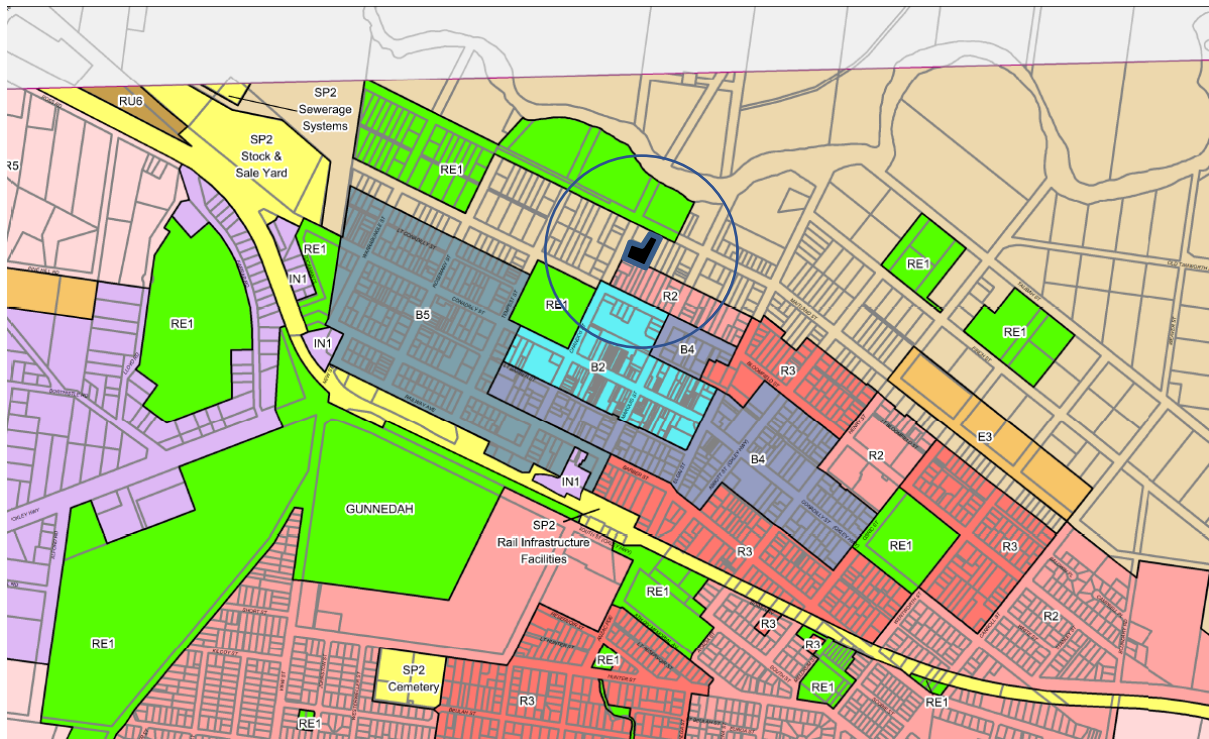


Figure 2: Site location within Gunnedah



Figure 3: Site showing lots, site boundary and applicable RU1 Primary Production zone



Figure 4: Aerial photo of site



Figure 5: Site photo from Chandos Street facing the park entrance location





Figure 6: Site photo viewed from Maitland Street

## APPENDIX B: Subject Land and Context

The land is located on the fringe of the Gunnedah township and comprises of 4 individual titles owned by the Gunnedah Shire Council. The land is listed as “operational” council land for the purposes of the Local Government Act.

The site is located within a mixed use setting, being approximately 200m from the commercial hub of Gunnedah. The adjacent surrounding land contains a mix of uses including established residential, commercial and community recreation land. Future development opportunity of the site is limited due to site constraints.



Figure 6: Subject site and context



## APPENDIX C: Site Description

The lots in question are previous residential lots in Gunnedah and are now vacant grassed lots with few trees. Residential houses were reclaimed and removed because the land is within the Namoi River High Hazard Flood Fringe. The proposal plans to utilise an area of approximately 7,000m<sup>2</sup> of land identified as RU1 Primary Production Zone under the Gunnedah Local Environmental Plan 2012.

The site fronts both Chandos Street and Maitland Street. Chandos Street provides direct sealed access to the main commercial centre of Gunnedah and the heavy vehicle detour (Bloomfield Street).



Figure 7: Subject site and surrounding residential properties

## APPENDIX D: Heritage

The Gunnedah LEP 2012 includes mapping of Heritage Items in the town. Below is an extract from the mapping showing the subject site in context with heritage items.

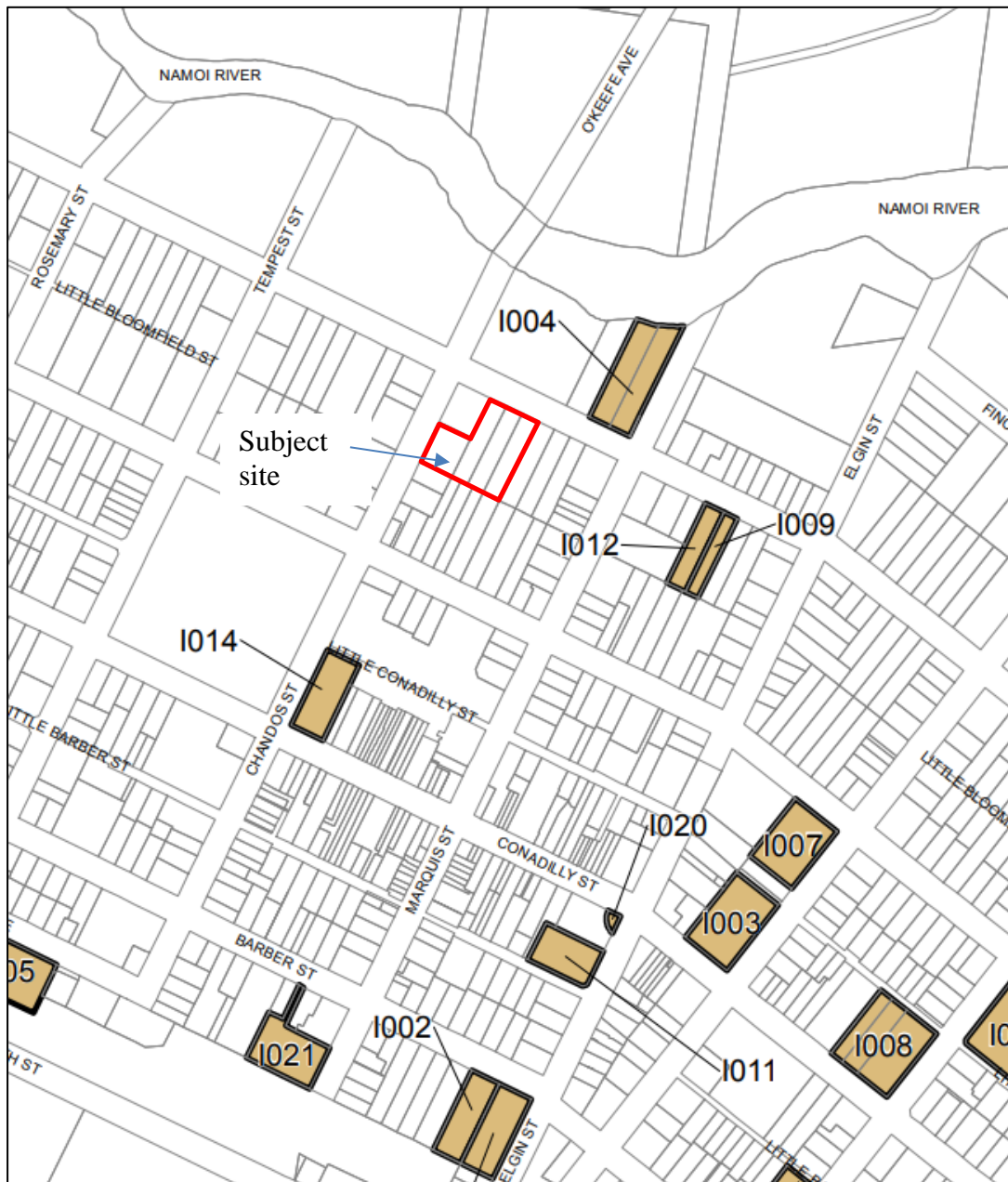


Figure 8: Heritage mapping Gunnedah LEP 2012

The subject site is not within a heritage precinct nor does it contain any heritage items within its boundaries. There are several heritage items identified in the vicinity of the site:

- I004 – old mill building on corner of Marquis and Maitland Streets. The site is not visible from the heritage item and does not impact on its curtilage.
- I012 – Roseneath Manor – historical residence that is not visible from the site

The heritage items identified are not impacted by the proposed development and this proposal will not affect the heritage significance of these properties.





## APPENDIX F: Traffic and Access

The crossover from Chandos Street will be constructed as per the Standard Drawings for residential driveways with a width and load bearing capacity to suit larger RVs. The cross-over will be concrete or two-coat sealed depending on council consent conditions.

Access to and from the park will be via a double gated entrance of approximately 8m width to facilitate the two-way movement of vehicles at the entrance.

Chandos Street is sufficiently wide enough to enable traffic to turn into the property whilst not obstructing through traffic. The development is within the town 50km/hr speed limit. Sight lines are unrestricted in both directions from the entranceway and traffic speeds are low (Figure 9).



Figure 9: Site line distances from park entrance



Figure 10: Street views north and south on Chandos Street from the park entrance

There is no public footpath within the road reserve on Chandos Street fronting the development site.

No parking spaces are provided within the park for the following reasons:

- No delivery vehicles are expected
- No guests are allowed at the park other than those booked in to stay in their own vehicles
- All tow vehicles must be parked within the allocated site
- The caretaker has their own site for an RV and tow vehicle

There is sufficient street parking in front of the development site if required.

The site is approximately 7,000m<sup>2</sup> in area. Based on experience with other parks up to 40 RVs can be sited within this footprint at any one time. This is assuming a range of vehicle sizes and configurations.

Generally, the RV parks are never at capacity and tend to operate at less than 50% occupancy across the year. There will be periods of extreme temperatures when it is possible there will be no park guests (mid-summer, mid-winter) for extended periods of time.

The proposed number of vehicles on the site at any one time will be a maximum of 25-30 vehicles (plus 1 for the manager's van, however this vehicle is parked on site for extended periods). On the basis that the RV or motorhome is the primary travelling vehicle for the visitor/s, it is likely for a short stay on the site, that there might be 2 traffic movements per day for daily expected tourism based exploring through the sub region. On that basis, it is estimated that the maximum number of traffic movements would be (a complete check out of all vehicles) 60 vehicle movements per day. The likelihood of this happening is low, as there will be peak, shoulder and low seasons throughout the year, where traffic movements from the site will be very minimal in comparison to the possible maximum movements.

On the basis of the above commentary regarding traffic movements, it is assumed that Chandos Street will be able to easily accommodate the extra traffic movements. On this basis, the following calculations are considered reasonable to use for this proposal:

- Maximum number of RV vehicles on site 30;
- Maximum 60 vehicle movements per day (based on a single return day trip for each vehicle)
- The seasonal nature of this use provides for variations;
- It is assumed for the purpose of this assessment that high season (spring and autumn months) will result in a full house and each vehicle will have two movements per day;
- Shoulder season will assume the park is half full every day;
- Low season will assume the park is empty most days (each period is made up of 4 months of the year);
- Therefore, when calculating an annual average daily traffic (AADT) for the site it is equal to 29.58;

This number of vehicle movements is considered minimal in the context of Chandos Street. It should also be noted that many guests will park their RV and set up camp for a number of days and then use bicycles or walk to nearby retail areas.

CMCA experience with RV park development confirms that the average stay per RV is 2.0 nights.

b

This report suggests that there will be no need to upgrade Chandos Street to accommodate the traffic movements associated with this development. The site is close to the northern boundary of the Gunnedah township and nearby to the town heavy vehicle bypass, so it will have little impact on local traffic.

## APPENDIX G: Analysis of Net Community Benefit Criteria

EVALUATION CRITERIA (YES/NO RESPONSE as applicable)	COMMUNITY COSTS AND BENEFITS		
	BASE CASE – CURRENT SITUATION (or COMMENT)	PLANNING PROPOSAL	COMMUNITY BENEFIT PER CRITERIA
Is the planning proposal compatible with agreed State and Regional strategic direction for development in the area?  Response: YES	The RU1 zoning does not permit the development of 'caravan park' and limits the development potential of the land.	The planning proposal will facilitate further development of the property intensifying the use of the land.	It is considered that the planning proposal will be positive in terms of costs and benefits based on this criterion.
Is the planning proposal located in a global/regional city, strategic centre or corridor nominated within the Metropolitan Strategy or another regional/sub-regional strategy?  Response: N/A	The planning proposal is not located in any of these specified areas.	Not applicable.	Not applicable.
Is the proposal likely to create a precedent or create or change the expectations of the landowner or other landholders?  Response: NO	Council currently maintains the land and it is undeveloped due to its zoning and location	The planning proposal seeks to allow the operation of a caravan park on this specific site only. Camping grounds are already a permitted use within the zone.	Not applicable.
Have the cumulative effects of other spot rezoning proposals in the locality been considered? What was the outcome of these considerations?  Response: N/A	No spot rezoning proposals have been considered or implemented in the locality.	Not applicable.	Not applicable.
Will the planning proposal facilitate a permanent employment generating activity?  Response: No	The land is vacant and has no employment generating capability at present.	The planning proposal will provide the opportunity for the employment of contractors during the construction phase and then into operational phase.	The proposal will result in a positive impact through local business turnover during construction. Park guests will spend within the town, supporting existing and new permanent staff within those local businesses.
Will the planning proposal impact upon the supply of residential	The land is not to be developed for residential purposes	There will be no impact on residential land supply or housing	Not applicable

EVALUATION CRITERIA (YES/NO RESPONSE as applicable)	COMMUNITY COSTS AND BENEFITS		
	BASE CASE – CURRENT SITUATION (or COMMENT)	PLANNING PROPOSAL	COMMUNITY BENEFIT PER CRITERIA
land and therefore housing supply and affordability?  Response: N/A		supply because of the development. Houses were removed from the land due to flood	
Is the existing public infrastructure (roads, rail, utilities) capable of servicing the proposed site?  Response: Yes	The land is already serviced by utilities and roads which are sufficient for the scale of activity.	The planning proposal proposes to access existing residential utility service connections.	No extra demand on public infrastructure that existed for the residential houses that existed on the land.
Is public transport currently available or is there infrastructure capacity to support future public transport?  Response: Yes	The park is located within walking distance of the major retail centre of Gunnedah. There is no bus or rail service within the town.	Not applicable	Not applicable
Will the proposal result in changes to the car distances travelled by customers, employees and suppliers?  Response: N/A	The development site is vacant land.	The planning proposal will result in the provision of tourist accommodation for self-contained vehicles. The aim of the development is to allow guests to park for a number of days and walk within the town.	Not applicable
If so, what are the likely impacts in terms of greenhouse gas emissions, operating costs and road safety?			
Are there significant Government investments in infrastructure or services in the area whose patronage will be affected by the proposal?  Response: N/A	Not Applicable	Not Applicable	Not Applicable
If so, what is the expected impact?			
Will the proposal impact on land that the Government has identified a need to protect (e.g. land with high biodiversity values) or have other	Land is not high value biodiversity land due to its previous use and location within the township.	Not Applicable	Not Applicable

EVALUATION CRITERIA (YES/NO RESPONSE as applicable)	COMMUNITY COSTS AND BENEFITS		
	BASE CASE – CURRENT SITUATION (or COMMENT)	PLANNING PROPOSAL	COMMUNITY BENEFIT PER CRITERIA
environmental impacts? Is the land constrained by environmental factors?  <i>Response: N/A</i>			
Will the LEP be compatible or complementary with surrounding land uses? What is the impact on amenity in the location and wider community?  Will the public domain improve?  <i>Response: YES</i>	The RU1 zone allows for the establishment of a camping ground.	The proposal is consistent with the permitted use of a camping ground and will not affect the permitted use but will expand the type of vehicles that can use the RV park. The amenity has been addressed through landscaping and park operational rules.	The development will provide landscaping and improve the visual amenity of the vacant land.
Will the proposal increase choice and competition by increasing the number of retail and commercial premises operating in the area?  <i>Response: No</i>	Limited low-cost camping options for self-contained recreational vehicles.	The planning proposal provides for an increase in the number of low cost camping sites available to tourists.	The proposal will increase visitor numbers to the town and CBD, resulting in increased revenue to these businesses. This will support existing businesses and provide an incentive for new service businesses.
If a stand-alone proposal and not a centre, does the proposal have the potential to develop into a centre in the future?  <i>Response: N/A</i>	Not Applicable	Not Applicable	Not Applicable
What are the public interest reasons for preparing the draft plan?	The RU1 zone prohibits caravan parks but allows camping grounds. The site is vacant public land that requires maintenance	The proposal seeks to allow the establishment of an RV park under the caravan park permitted use.	The intended use will expand the local tourism economy, provide more accommodation options for self-contained recreational vehicles. An increase in economic activity through local retail.
Summary	A significant net community benefit is identified by this analysis for 5 of the 6 applicable criteria examined above. No significant net cost was identified relating to any of the criteria considered.		



APPENDIX H: Additional Permitted Uses Map

