

Canterbury LEP 2012 - implementing the Residential Development Strategy

Proposal Title :	Canterbury LEP 2012 - implementing the Residential Development Strategy		
Proposal Summary :	To amend Canterbury Local Environmental Plan 2012 (CLEP 2012) to implement key aspects of Council's recently completed residential development strategy (RDS).		
PP Number :	PP_2014_CANTE_001_00	Dop File No :	14/02541

Proposal Details

Date Planning Proposal Received :	07-Mar-2014	LGA covered :	Canterbury
Region :	Sydney Region East	RPA :	Canterbury City Council
State Electorate :	CANTERBURY LAKEMBA OATLEY	Section of the Act :	55 - Planning Proposal
LEP Type :	Precinct		

Location Details

Street :			
Suburb :		City :	Postcode :
Land Parcel :	The proposal involves multiple sites and precincts.		
Street :			
Suburb :		City :	Postcode :
Land Parcel :	The proposal involves certain land zoned R4 High Density Residential, all land zoned B5 Business Development and B6 Enterprise Corridor under CLEP 2012, as well as fifteen separate precincts and individual properties.		

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RPA Contact Details

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DoP Project Manager Contact Details

Contact Name :	
Contact Number :	
Contact Email :	

Land Release Data

Growth Centre :		Release Area Name :	
Regional / Sub Regional Strategy :		Consistent with Strategy :	
MDP Number :		Date of Release :	
Area of Release (Ha) :		Type of Release (eg Residential / Employment land) :	
No. of Lots :	0	No. of Dwellings (where relevant) :	750
Gross Floor Area :	0	No of Jobs Created :	211

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

If No, comment :

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

If Yes, comment : **The Agency is not aware of any meetings or communications with registered lobbyists concerning this planning proposal.**

Supporting notes

Internal Supporting Notes : **The proposal was received on 3 February 2013. Following initial assessment and consultation with the Employment Lands Team, Council was requested to provide additional information and correct various mapping and other errors on 26 February. The proposal was re-submitted on 7 March 2013, with an additional precinct (28-42 Josephine Street, Riverwood) for consideration.**

While Council has accepted the planning making delegation, it has not requested its use in this instance. It is proposed to enable Council to finalise the proposal under delegation, subject to any necessary conditions.

Council has included a seven month project timeline to complete the plan, which is considered insufficient for a complex proposal.

CLEP 2012 already includes a provision allowing Residential Accommodation as part of mixed use development in the B5 Business Development zone under Schedule 1 - Additional Permitted Uses. The Department agreed to this as a way of meeting Council's desire to permit a ground floor residential component as part of mixed use development, which is not permitted under the definition of Shop Top Housing.

External Supporting Notes : **The Department's Code of Practice in relation to communications and meetings with lobbyists has been complied with. Metro Delivery (CBD) has not met any lobbyist in relation to this proposal, nor has the Director been advised of any meetings between other agency officers and lobbyists concerning this proposal.**

Adequacy Assessment

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

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

Comment : **The statement of objectives is considered adequate, given the extent of the proposed**

changes:

1. correct zoning anomalies
2. provide catalyst sites for redevelopment
3. fine tune existing planning controls to help achieve greater efficiencies
4. assist in meeting housing targets.

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

Is an explanation of provisions provided? Yes

Comment : The proposal (Tag A) seeks to make the following policy, site specific and operational amendments to CLEP 2012:

A. CONSOLIDATE B5 and B6 ZONES

Consolidate all B6 Enterprise Corridor zoned land into the B5 Business Development zoning, as recommended by the RDS, because of their similarities and to also permit further housing opportunities on this land, by:

- rezoning all B6 zoned land to B5;
- applying the current provision under Schedule 1 of CLEP 2012, which permits Residential Accommodation as part of a mixed use development in the B5 zone, to this additional B5 land;
- carrying over B6 land uses not currently permitted in the B5 zone (ie Business Premises, Community Facilities, Light Industries, Plant Nurseries);
- adding residential flat buildings (RFBs) as a new permitted use in the consolidated B5 zone;
- carrying over the permissibility of Transport Depots from the B6 zone to the B5 zones, subject to specialised DCP controls;
- prohibiting certain uses currently permitted in the B6 zone from the proposed consolidated B5 zone, as they are generally not compatible with the residential uses permitted in the B5 zone (ie Animal Boarding or Training Establishments, Depots, Farm Buildings, Mortuaries, Vehicle Body Repair Workshops, Vehicle Repair Stations) (see proposed land use table in Part 2 of Council's submission at Tag A);
- increasing the current 12 m building height limit currently applying to B6 zoned land to the general 18 m height limit currently applying to the B5 zone, except for land in the Canterbury Road/Stanley Street/Perry Street/Una Street precinct at Campsie.

B. DELETE FLOOR SPACE RATIO (FSR) CONTROLS ON LARGER SITES ZONED R4 HIGH DENSITY RESIDENTIAL

Based on the RDS' recommendations recognising larger sites potentially have greater development efficiencies and can accommodate greater floor areas, the proposal is to delete FSR controls applying to R4 zoned land, but only where:

- a maximum 11.5 m building height applies;
- the site area exceeds 3,000 sqm; and
- the site frontage exceeds 50m or more.

C. PLANNING CONTROL AMENDMENTS TO 15 SEPARATE PRECINCTS OR PROPERTIES

Based on the RDS' recommendations, plus some amended precinct boundaries put forward by Councillors, the proposal seeks the following amendments (See summary of changes and maps for each item at C-Q in the proposal at Tag A):

(i) An increase in permissible density through:

- increases to either maximum permissible building height or maximum permissible FSR controls, or both, on a particular site;
- deletion of FSR controls where the land is being rezoned to B5 Business Development, to ensure consistency with provisions for the B5 zone where FSR controls are not applied.

(ii) Changes to permissible land uses through zoning amendments:

- rezoning certain land from R3 Medium Density Residential to R4 High Density Residential, to in particular, permit residential flat buildings;

- rezoning certain land from R4 High Density Residential to B5 Business Development to permit a much greater range of business uses;
- rezoning two sites from IN2 Light Industrial and RE 2 Private Recreation to R4 High Density Residential and R3 Medium Density Residential respectively;

(iii) Consequential amendments to lot size requirements:

- all land being rezoned from R3 or R4 to B5 will no longer be subject to lot size requirements, to be consistent with other B5 zoned land.

Justification - s55 (2)(c)

a) Has Council's strategy been agreed to by the Director General? **No**

b) S.117 directions identified by RPA :

1.1 Business and Industrial Zones

2.3 Heritage Conservation

* May need the Director General's agreement

3.1 Residential Zones

3.4 Integrating Land Use and Transport

4.1 Acid Sulfate Soils

6.3 Site Specific Provisions

7.1 Implementation of the Metropolitan Plan for Sydney 2036

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

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

d) Which SEPPs have the RPA identified?

SEPP No 1—Development Standards

e) List any other matters that need to be considered :

SEPPs

It is agreed with Council that the proposal is consistent with all relevant SEPPs. In relation to SEPP 55 - Remediation of Land, the proposal involves two contaminated sites which Council will manage by requiring remediation at the development application stage:

- 1375 Canterbury Road, Punchbowl, which previously contained a service station and is on a list of contaminated lands as Management Class A and notified to the Environmental Protection Agency (EPA), which is assessing the site; and
- 403-411 Canterbury Road and 1 Una Street, Campsie contains an existing service station for which notices have been served by the EPA.

SECTION 117 DIRECTIONS

The proposal is generally consistent with the relevant s117 Directions, with the exception of Directions 1.1 Business and Industrial Zones and 7.1 Implementation of the Metropolitan Plan for Sydney 2036, as discussed in the following section.

2.3 Heritage Conservation

There are no State or local heritage items or conservation areas involved.

3.1 Residential Zones

This direction encourages a wide variety of housing choice and types, make efficient use of infrastructure and services and minimise impact on the environment. In relation to residential development, the proposal involves:

- upzoning about 9,000 sqm of land from R3 to R4;
- rezoning about 3,200 sqm of land from IN2 to R4;
- rezoning about 9,800 sqm from RE2 to R3;
- increasing the density of about 24,100 sqm of R4 land through height and FSR changes to specific sites;
- an indeterminate potential increase in density through removal of FSR controls on R4 land over 3,000 sqm in size and with frontages exceeding 50 m; and
- loss of about 19,000 sqm of R3 and R4 land to B5, but the latter allowing RFBs and residential accommodation as part of mixed use development.

Council says the proposal will result in a net loss of 6,040 sqm of residential land, but this will be compensated for by:

- increasing the density of 33,100 sqm of residential land;
- potential further density increases through the removal of FSR controls on

- larger sites in R4 zones;
- providing 43,700 sqm of additional land for residential accommodation in mixed use development (ie B6 land rezoned to B5), plus permitting RFBs across the whole of the consolidated B5 zone; and
- a net 770 dwelling increase in housing capacity through the site specific rezonings, plus an as yet unknown dwelling increase from the removal of FSR controls from R4 land over 3,000 sqm in size.

It is agreed with Council that the proposal is consistent with this direction because it would:

- broaden the choice of building types by allowing RFBs in the B5 zone, site specific upzonings from R3 to R4, increasing density in the R4 zone, resulting in more multi-dwelling housing, RFBs and mixed use development, complementing housing permitted in R2 and R3 zones;
- make more efficient use of existing infrastructure and services by provide land for additional housing in an established urban area;
- help to reduce the consumption of land for housing on the urban fringe;
- generate development that would need to meet Council's design requirements;
- not reduce the permissible density of any residential land; and
- is justified by Council's recently completed RDS study.

3.4 Integrating Land Use and Transport

This direction development improves non-car based access to housing, jobs and services, reduces travel demand, supports public transport and efficient freight movement. It is agreed with Council that the proposal is generally consistent with this direction and the referenced policy documents (Improving Transport Choice - Guidelines for Planning & Development; and The Right Place for Business & Services) because:

- all of the specific sites entailing a zoning change or increase in density are located within 400 to 1000 metres walking distance of railway stations or high frequency bus routes (Principle 1 of the Improving Transport Choice);
- most of the site specific locations are within close proximity of existing centres or land zoned for future centre provision;
- locations for bulky goods and other large floor plate commercial development to arise in the B5 zone are located near existing clusters on Canterbury Road, and will help reinforce the role of Canterbury Road in this regard.

4.1 Acid Sulfate Soils

This direction aims to avoid significant adverse environmental impacts from using land potentially containing acid sulfate soils. This direction is relevant because the proposal includes four affected sites:

- 2-16 Sixth Avenue, Campsie – Class 5 (Site area 4000m2)
- 26-30 Campsie Street and 1 Assets Street, Campsie – Class 5 (Site area 1700m2)
- 998 Punchbowl Road, Punchbowl - Class 5 (Site area 1800m2)
- 134-140 Brighton Avenue, Campsie – Class 4 (Site area 1650m2) fate soils.

Council has advised the proposal is generally consistent with this direction because:

- all of the sites involved are relatively small and the impact will be minor, as this involves less than 0.1% of the LGA's 1,045 ha of acid sulfate soil affected land and two of the sites are already zoned R4;
- while the other two sites have a potentially greater impact as the zoning change proposed is from R3 to R4, both include existing service stations and will need to be remediated anyway if developed for residential purposes; and
- safeguards to control any soil leaching would be put into place as required by clause 6.1 of CLEP 2012.

However, as clause 6 of the direction requires Council to consider an acid sulfate soils study assessing the appropriateness of the change of land use given the affectation, the proposal is technically inconsistent with the Direction. It is recommended that the proposal is justifiably inconsistent with this direction because the inconsistency is considered to be minor, as explained by Council.

4.3 Flood Prone Land

It is agreed with Council that the proposal is consistent with this direction as none of the land is identified as flood affected under CLEP 2012.

6.3 Site Specific Provisions

This direction aims to discourage unnecessarily restrictive site specific controls. The direction is relevant because site specific provisions are proposed for two sites, which Council considers justified, given the benefits of allowing increased density to encourage appropriate development and minor nature of the inconsistency:

134-140 Brighton Avenue, Campsie

As part of the rezoning from R3 to R4, Council proposes to only permit development for RFBs and a 0.75:1 FSR if the site is developed as one whole parcel: otherwise RFBs will not be permitted and the FSR would be 0.5:1. Council is providing this as an incentive to remove a non-conforming service station in a family holding with two residential lots, in a way that avoids the separate development of the residential lots, leaving the service station on a site that may not easily redevelop.

2-16 Sixth Avenue, Campsie

Council proposes to allow a height of 25 m where the site area exceeds 3,000 sqm and site frontage exceeds 50 m to facilitate appropriate development by encouraging amalgamation of eight separate and relatively small lots, as Council does not consider development of this height appropriate on lots under 50 m frontage.

It is recommended that the Director General agree that the proposal is justifiably inconsistent with this direction because the inconsistent provisions are of a minor nature.

7.1 Implementation of the Metropolitan Plan for Sydney to 2036 (Metro 2036)

This direction aims to give legal effect to Metro 2036. A proposal can be inconsistent with Metro 2036 if it is minor or achieves the overall intent of it and doesn't undermine its vision, land use strategy, policies, outcomes or actions. While Council does not address consistency in detail, it is agreed with Council's conclusion that the proposal is generally consistent with Metro 2036.

Residential policy

As discussed above in relation S117 3.1 Residential Zones, the proposal will have positive residential outcomes which will help to meet Canterbury's 7,100 extra dwellings target under the draft South Subregional Strategy, consistent with the policy objectives of Metro 2036.

Employment land policy

The proposal in part involves rezoning 2-12 Harp Street, Campsie (part of the 17.1 ha Clemton Park area classified Category 1 under the draft South Sub-regional Strategy) from IN2 to R4 would, resulting in a relatively small loss of about 3,200 sqm of this industrial land. This raises the question of consistency with Action E3.2 Retain strategically important employment lands under Metro 2036. The Employment Land Team has agreed with Council's explanation that this inconsistency is justified because of the rezoning of the adjoining former Sunbeam site (part of the 17.1 ha Category 1 Clempton Park industrial estate) to B1 and R4 under a 2010 Part 3A concept plan approval (Tag xx).

The Employment Land Team has raised Metropolitan perspective concerns in relation to the introduction of RFBs in the consolidated B5 zone, which has not been adequately assessed, to determine its potential for significantly reducing the amount of land available for employment purposes and potentially setting a precedent. However, these concerns were not in the context of consistency with Metro 2036, as this land was not classed as strategically significant under the draft South Sub-regional Strategy (Tag xx).

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

If No, explain :

INCONSISTENCY WITH S117 DIRECTION 1.1, BUSINESS AND INDUSTRIAL ZONES

This direction encourages employment growth, protects employment land in business and industrial zones and supports the viability of centres. When proposing to affect land within these zones, the RPA is required to:

- give effect to this direction;
- retain existing business and industrial zones;
- not reduce the total potential floor space for industrial uses in these zones;
- ensure new employment areas are in accordance with a strategy approved by the Director General.

Council's submission did not:

- specifically address whether the proposal was consistent, inconsistent or justifiably inconsistent with this direction;
- quantify the overall likely gain or loss of employment land resulting from the proposed changes; and
- conclude whether the proposal sufficiently protects employment land in business and industrial zones to be consistent with this as required under clause 1(b) of the direction.

The submission therefore does not adequately assess or conclude whether the proposal is consistent with respect to:

- 4(b) retaining existing business and industrial zones;
- 4(c) not reducing the total potential floor space area for employment uses and related public services in employment zones;
- 4(d) not reducing the total potential floor space area for industrial uses in industrial zones;
- 4(e) ensuring that proposed new employment areas are in accordance with a strategy approved by the Director General.

As required under the direction, the proposal is not justified by:

- (5)(a)(i) a strategy which gives consideration to the objectives of this Direction;
- (5)(b) justified by a study prepared in support of the proposal which gives consideration to the objective of this direction;
- (5)(c) in accordance with a relevant regional or sub-regional strategy; or
- (5)(d) being of minor significance.

The Employment Lands Team advised (Tag B):

- as the B6 zones are located near the B5 zones and the latter zone will allow Light Industries (encouraging a wider variety of industrial uses along Canterbury Road), this change will not be detrimental to the LGA's long term industrial operations;
- as both B5 and B6 zones have a high employment focus, the Standard LEP Template does not include any form of residential accommodation and the B5 zone already permits Shop Top Housing and residential accommodation as part of mixed use development (via Schedule 1), introducing RFBs would detrimentally impact on the long-term viability of the LGA's industrial uses;
- rezoning 2-12 Harp Street, Campsie (part of the 17.1 ha Clemton Park area classified Category 1 under the draft South Sub-regional Strategy) from IN2 to R4 would result in a loss of 3,200 sqm of industrial land; and
- the 2032 - City of Canterbury Economic Development and Employment Strategy (SGS, 2009) recommended Canterbury must halt employment loss to achieve its 500 jobs target by 2031.

Subsequent information supplied by Council (Tag C) further explaining the rationale for the proposed rezoning of 2-12 Harp Street to R4, due largely to the rezoning of adjoining former industrial land (Sunbeam) for residential, commercial and aged persons' housing under Part 3A of the Act in 2010, satisfied the Employment Lands Team's concerns about this apparent inconsistency.

However, the lack of any further substantial supporting analysis or data on how much land would remain in the LGA exclusively for employment purposes if RFBs were allowed in the B5 zone did not allay concerns about the long-term impact of the proposal on the LGA's employment land, which was not addressed by the RDS.

Mapping Provided - s55(2)(d)

Is mapping provided? **Yes**

Comment : All maps are considered adequate and indicate current and proposed provisions under CLEP 2012

Community consultation - s55(2)(e)

Has community consultation been proposed? **Yes**

Comment : Council proposes to exhibit the proposal for a minimum of 28 days in accordance with standard exhibition and notification procedures.

Additional Director General's requirements

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

If Yes, reasons :

Overall adequacy of the proposal

Does the proposal meet the adequacy criteria? **No**

If No, comment : The explanation of the proposal's provisions is generally adequate, except in relation to providing justification for the inconsistency of the proposed introduction of RFBs in the consolidated B5 zone with S117 Direction 1.1 Business and Industrial Zones.

Proposal Assessment

Principal LEP:

Due Date :

Comments in relation to Principal LEP : The CLEP commenced in January 2012.

A total of \$316,000 of LEP acceleration and Planning Reform funding was allocated to Council to assist with preparing the draft LEP.

Assessment Criteria

Need for planning proposal :

The proposal arises from Council's perceived need to amend CLEP 2012 to implement the recommendations of its 2013 RDS to guide the growth of the LGA's residential community to 2031. The RDS acknowledges that the LGA currently has sufficient capacity to meet its 7,100 dwelling target to 2031 under the draft South Subregional Strategy. However, it concludes additional growth will be needed to address issues including:

- correcting emerging zoning anomalies;
- rezoning larger sites which are no longer suitable for their current zoning;
- fine tuning existing controls to achieve greater efficiencies; and
- meeting higher sub-regional dwelling targets outlined in the draft Metropolitan Strategy for Sydney to 2031.

Consistency with strategic planning framework :

CONSISTENCY OF RESIDENTIAL ASPECTS

Council advised the proposal, as supported by its recently completed RDS, is generally consistent with the draft Metropolitan Strategy for Sydney to 2036, the Metropolitan Plan for Sydney 2036 and the draft South Subregional Strategy (and its 7,100 dwelling target) because it:

- potentially provides about 770 new dwellings through specific site rezonings, plus additional dwellings from the removal of FSR controls on larger sites, which were not possible to quantify at this stage; and
- is generally consistent with the housing and other sub-regional objectives of these policies.

Council also advised the proposal is consistent with its Community Strategic Plan, as it assists its 'Attractive City' and 'Balanced Development' objectives by revitalising the Canterbury Road corridor and facilitating appropriate location of new housing and refinement of planning controls.

It is noted that the agency contributed \$50,000 of funding to the RDS under Round 8 of the Planning Reform Fund and that this work has been satisfactorily completed.

Subject to the acceptability of allowing RFBs in the consolidated B5 zone, it is generally agreed with Council that the proposal is consistent at the Metro-level strategic planning framework in relation to its residential changes.

CONSISTENCY OF EMPLOYMENT LAND ASPECTS

The only comment made by Council in relation to the adequacy of the proposal with respect to employment land policy was that the proposal is justifiably inconsistent with Action E3.2 of the Metropolitan Plan for Sydney to 2036 and Section A of the draft South Subregional Strategy in relation to the rezoning of 3,200 sqm of IN2 zoned land to B4 (2-12 Harp Street Campsie). This is justified by the change in character of the adjoining former Sunbeam industrial site to B1 and R4 mixed use development under a 2010 Part 3A Concept Plan for Clemton Park Village.

The proposal was referred to the Employment Lands Team, which advised (Tag B):

- the amalgamation of B6 zones into the B5 zone is not considered detrimental to long term industrial operations in the LGA;
- the rezoning of the 2-12 Harp Street Campsie IN2 area is consistent with the changing nature and needs of the area;
- given the dominant employment focus of the B5 zone, the introduction of RFBs in all B5 zoned land raises concerns about how much land would remain exclusively for employment purposes; and
- Council should be requested to assess the impact of RFBs on its B5 land land, particularly how much land would remain for employment generation, given the precedent this could set for other councils.

The Employment Lands Team's comments are supported.

Environmental social economic impacts :

Council advised:

- there is no indication that critical habitat or threatened species, populations or ecological communities or their habitats could be adversely affected by the proposal, as all of the sites involved have already been developed for urban purposes;
- there are no other likely environmental, social or economic impacts; and
- any adverse impact on the viability of existing town centres have been controlled by prohibiting retail premises, so as to not adversely draw activity away from centres.

Council's assessment is agreed with except in relation to the introduction of RFBs in the consolidated B5 zone, which has not been adequately assessed to determine its potential for significantly reducing the amount of land available for employment purposes and potentially setting a precedent for other LGAs, as raised by the Employment Lands Team.

Assessment Process

Proposal type : **Precinct** Community Consultation Period : **28 Days**

Timeframe to make LEP : **12 months** Delegation : **RPA**

Public Authority Consultation - 56(2) (d) : **Transport for NSW - Roads and Maritime Services**

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

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

If no, provide reasons :

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

If Yes, reasons :

Identify any additional studies, if required. :

Other - provide details below

If Other, provide reasons :

Prior to deciding whether to allow RFBs in the B5 zone, Council should be requested to undertake an assessment of any potentially adverse impact of this aspect of the proposal on the amount of land available exclusively for employment purposes and its viability to generate jobs to meet sub-regional employment targets, and potential for setting a precedent.

Identify any internal consultations, if required :

Employment Lands (ELDP)

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

If Yes, reasons :

Documents

Document File Name	DocumentType Name	Is Public
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Planning Team Recommendation

Preparation of the planning proposal supported at this stage : **Recommended with Conditions**

S.117 directions:

- 1.1 Business and Industrial Zones**
- 2.3 Heritage Conservation**
- 3.1 Residential Zones**
- 3.4 Integrating Land Use and Transport**
- 4.1 Acid Sulfate Soils**
- 6.3 Site Specific Provisions**
- 7.1 Implementation of the Metropolitan Plan for Sydney 2036**

Additional Information : **It is recommended that the proposal proceed subject to the following conditions:**

- 1. the proposal is exhibited for 28 days; and**
- 2. the planning proposal is completed within 12 months of the gateway determination.**

The RPA should be advised that:

1. The proposal is consistent with S117 Directions 2.3 Heritage Conservation, 3.1 Residential zones, 3.4 Integrating Land Use and Transport;
2. the Director General agrees the inconsistencies with Direction 4.1 Acid Sulfate soils and 6.3 Site Specific Provisions are of minor significance;
3. given the inconsistency of the proposal with S117 Direction 1.1 Business and Industrial Zones, prior to exhibiting the proposal, Council be requested to undertake an assessment the potential impact of allowing RFBs in the consolidated B5 zone, particularly how much land would remain for generating employment uses to meet Council's employment target, and any potential for this to set a precedent for other LGAs; and
4. consultation with Roads and Maritime Services is required.

Supporting Reasons :

The proposal, which is not minor in nature, is generally considered to be the most efficient means of achieving the stated objectives of implementing key aspects of Council's 2013 Residential Development Strategy.

Signature:



Printed Name:

Tim ARCHER

Date:

21/3/14

