

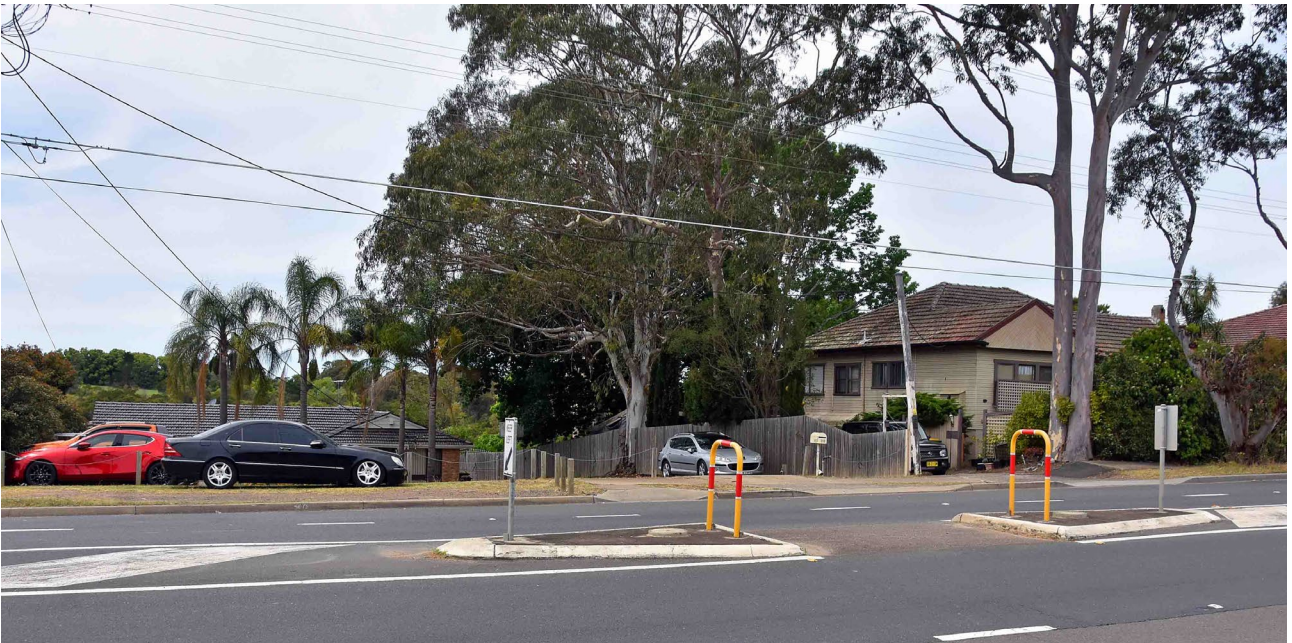
7) Appendix G

**Agricultural Viability Assessment
Prepared by
Edge Land Planning**



Agricultural Viability Assessment

679-685 Old Northern Road, Dural



March 2022

Agricultural Viability Assessment
679-685 Old Northern Road, Dural

Prepared for Healing ONR Pty Ltd

by



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Executive Summary

The site is located at 679-685 Old Northern Road, Dural, on the eastern fringe of the Round Corner Town Centre and is comprised of two lots. The site is zoned as RU2 Rural Landscape with a minor portion zoned SP2 Infrastructure at 679-681 Old Northern Road under the provisions of Hornsby LEP 2013.

The site has an area of approximately 3,500m² and is currently used for residential purposes with dwellings located on both lots.

Hornsby Shire has an extensive rural area which had a value of \$21.7m in 2016. This placed it as number nine in the Sydney peri-urban area. The nurseries contribute 38% of the Hornsby Shire total followed by flowers (25%) poultry meat (23.5%) vegetables (6.1%) and fruit (4.9%). Employment in agriculture is another indicator of an area's agricultural importance. Data from the ABS Census of Population and Housing for 2016 shows that employment in agriculture for the rural lands of the Hornsby Shire is 4.9% which is equal seventh with manufacturing and that for the South Dural area it is 2.1%. This shows that agriculture is not as significant for the people living in the Shire as a whole as well as the South Dural area in particular.

The land surrounding the site is known as the Dural – Kenthurst – Wisemans Ferry region which also includes land in The Hills Shire to the west of Old Northern Road. This has a similar percentage make up of production to the Shire.

The site has a number of constraints to be used for agriculture. They are as follows:

- The size of the land;
- The slope of the land;
- Surrounding land use;
- Soils.

The size of the land is the major constraint because at approximately 3,500m², it severely limits the potential of the land to be used for productive agriculture. The only options are intensive plant growing. This includes protected cropping and potentially nurseries. However, due to the size, protected cropping is considered to be the only type that could earn sufficient income. A minimum size for a greenhouse is 2,000m². In addition to the greenhouse, there is a need for a packing shed and coolroom, office, staff amenities and parking as well as truck parking and manoeuvring. It is not considered that there is sufficient room on the site for the greenhouse and the associated infrastructure.

The cost of construction of the greenhouse is approximately \$400,000. The cost of the internal infrastructure is approximately \$350,000 and the shed, carparking and manoeuvring area is approximately \$100,00. This is an upfront total cost of \$850,000, excluding labour costs, prior to any crop production or financial return.

The land has a fall of approximately 6m from the road frontage to the rear of the lots. A greenhouse requires a flat site and so there would be a need for a significant amount of cut and fill to provide a sufficiently flat area for the greenhouse and associated infrastructure. Having regard to the size of the retaining wall, it is marginal if this would be feasible. The cost of the earthworks and associated drainage would be significant.

The land surrounding the site is residential dwellings to the south, a veterinary clinic and townhouse development to the north. Further north and north-west is the Round Corner Town Centre. To the immediate east is a newly constructed residential aged care

facility by Thompson Health Care. Across the road, to the immediate west, is urban zoned land, known as the Round Corner Town Centre Expansion Site, which has DA approval for a mix of commercial and retail uses and permissibility for residential apartments and townhouses. This land use does not include agriculture. Greenhouses can cause land use conflict from the use of machinery such as forklifts, plant such as high-pressure water cleaning machines, mist blowers and other noise and odour generating equipment. For example, the high-pressure water cleaning machines are used to clean the benches every month and this can take up to 3 hours. Most misters are two-stroke combustion engines and the plant misting (to stimulate plant growth) can take up to one hour to complete and are done two to three times per week. These noises and odours can be characterised as offensive and for that reason, land use conflict will be created. For this reason, it is not considered that a greenhouse will be supported by the surrounding community, adjoining landowners and may not be approved by Council.

The soil landscape is called Glenorie. This soil has low to moderate fertility. However due to the size of the site, soil-based agriculture is not possible.

In reviewing all of the available information, the finding of this report is that the only type of agriculture that is sustainable and can support a family without an appropriate source of off farm income is protected cropping, but this is marginal having regard to the size of the site, its slope and upfront capital costs, all of which make it difficult to construct an adequately large enough greenhouse to be attractive and financially feasible for a future operator.

Chapter 1: Introduction

1.1. Introduction

Healing ONR Pty Limited intends to develop land at 679-685 Old Northern Road, Dural for a health services facility. The site is located on the eastern fringe of the Round Corner Town Centre, comprising of two lots with an area of approximately 3,500m² and is currently used for residential purposes with dwellings located on both lots.

Edge Land Planning has been engaged to provide an assessment of the agricultural land capability of the land.

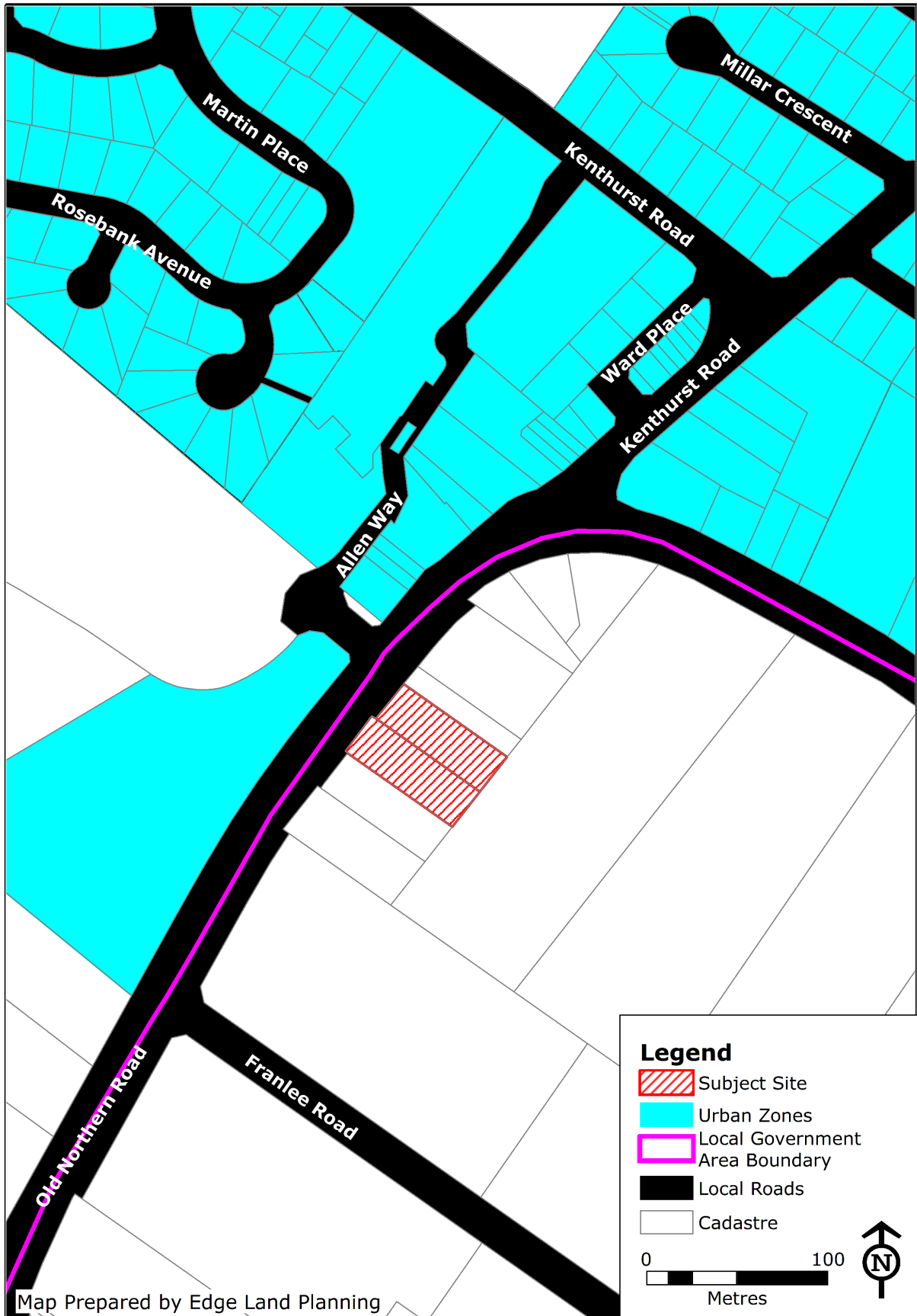
The study will specifically address the Local Planning Section 9.1 Directions 9.2 and 9.5 dealing with rural lands.

This study has been prepared to accompany a planning proposal to be submitted to Hornsby Shire Council and the NSW Department of Planning and Environment to enable an Additional Permitted Use for a health services facility and to increase the height control from 10.5m to 14m.

1.2. Study Area

The study area is shown in Figure 1 and is in the Hornsby Shire on the boundary with The Hills Shire. The figure shows the urban zoned land in The Hills Shire, specifically the Round Corner Town Centre retail precinct. The site is opposite the Round Corner Town Centre Expansion Site.

The site has a frontage to Old Northern Road with residential dwellings and the DA approved 440 seat Maronite Church and community facility site to the south, a veterinary clinic and townhouse development to the north. To the immediate east is the recently completed Thompson Health Care residential aged care facility. To the immediate west, the Round Corner Town Centre Expansion Site (Dural Skyline) is zoned B2 Local Centre and R3 Medium Density Residential with 14m and 18m height controls. A mixed-use development comprising retail, commercial and residential uses (town homes and apartments) is proposed and Stage 1 has recently been approved.



Chapter 2: Site Description

2.1. Introduction

This chapter provides a detailed description of the site and focuses on the slope, drainage, vegetation, soils and the land use of the site.

Figure 2 shows both sites and the dwellings on each lot. It can be seen that the dwelling on 683-685 Old Northern Road (left) is set back from the road.



Figure 3 shows an aerial photo of the site. This shows the two lots with dwellings located on them as well as the surrounding uses. The Thompson Health Care Dural House residential aged care facility is shown as under construction but has been completed.



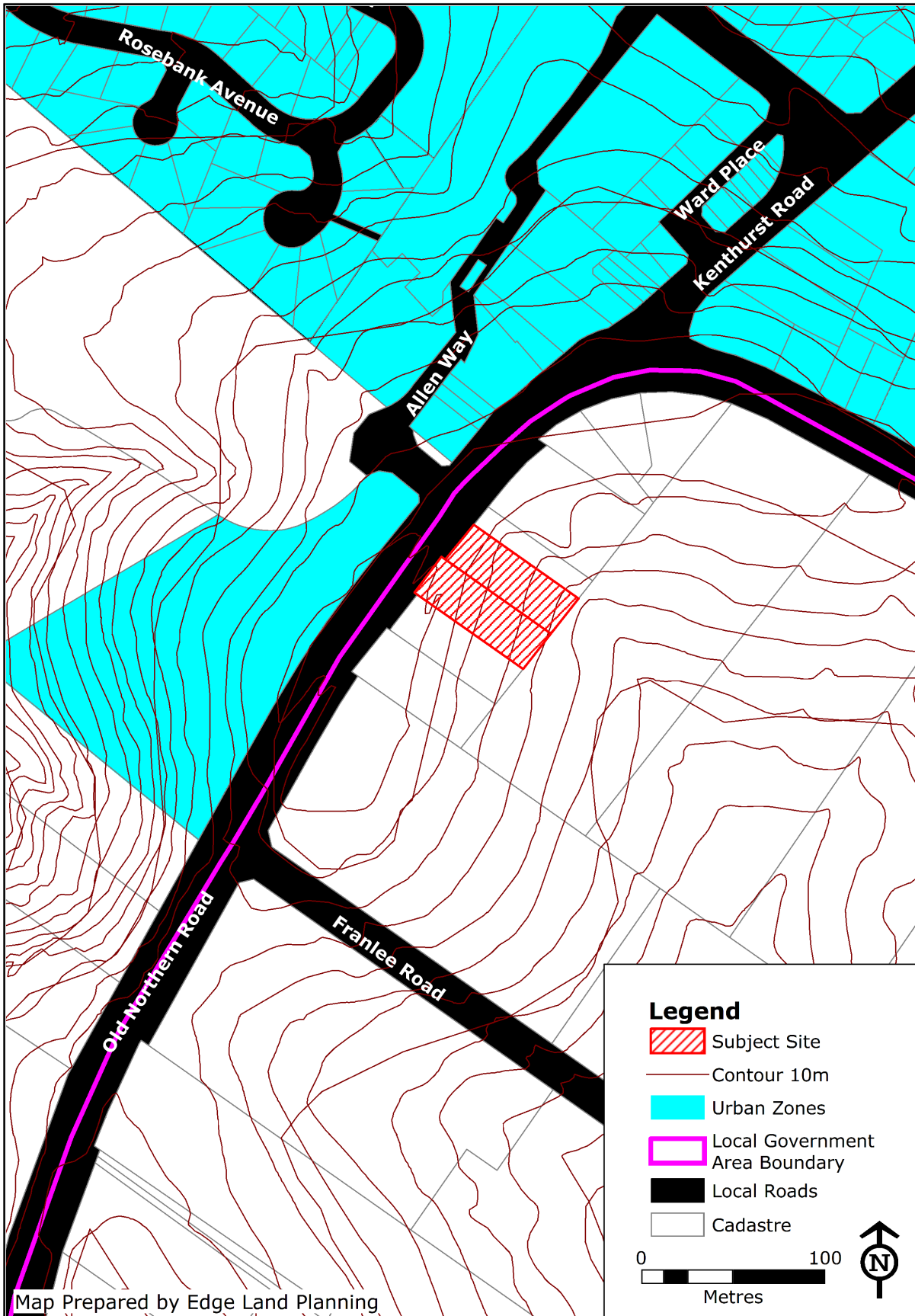
2.2. Slope

The site can be described as sloping land falling away from Old Northern Road. Figure 4 shows the rear of 679-681 Old Northern Road, looking east.



Date of Photo: November 2021

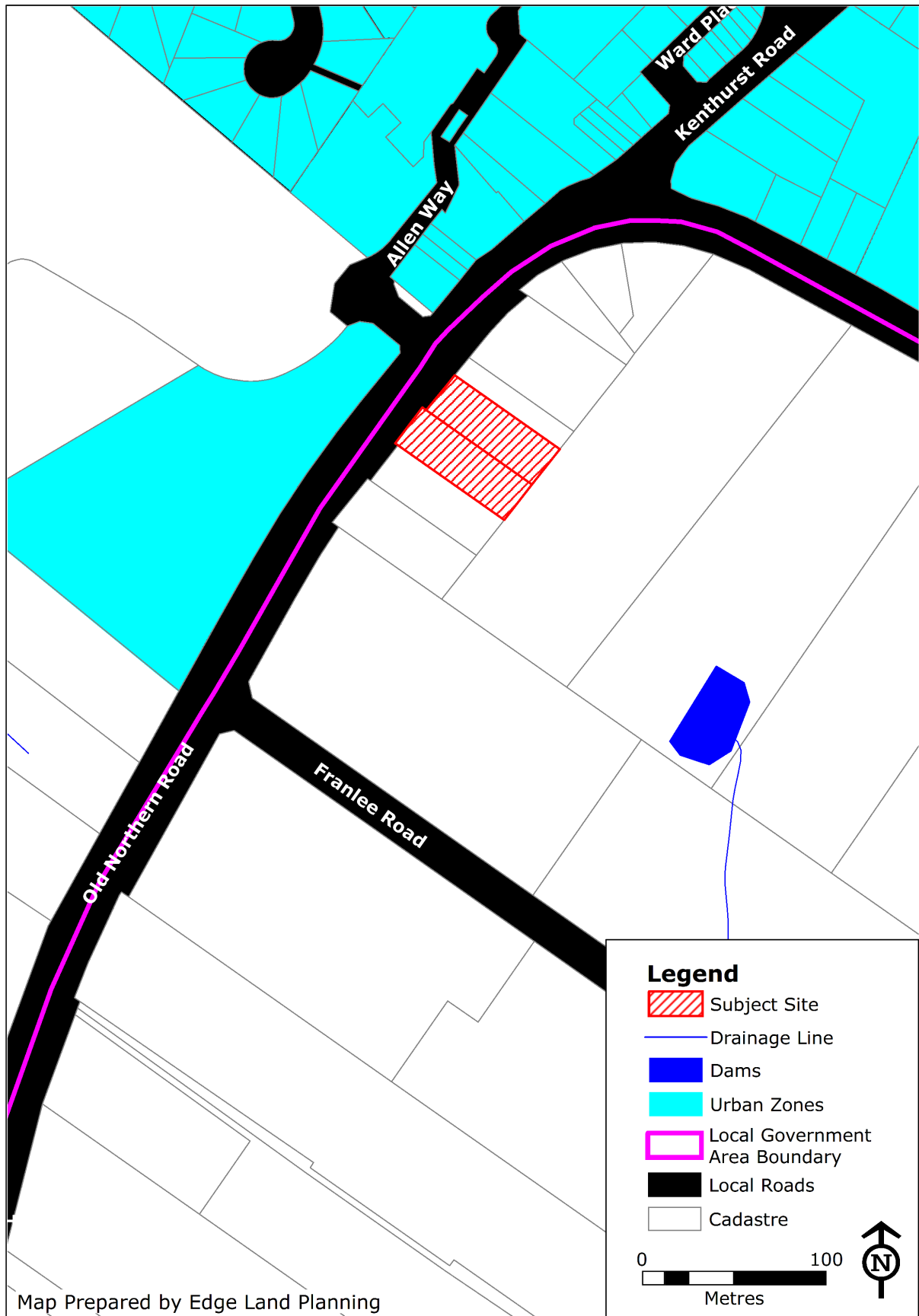
As depicted in Figure 5, the site has a fall of approximately 6m from the road frontage to the rear of the lots. Old Northern Road is on a ridge line and the site falls to the east.



2.3. Drainage

The site has no formal drainage lines on it but it falls from Old Northern Road and drains in an easterly direction.

Figure 6 shows the drainage lines and it can be seen that there are none but there is a dam to the south-east which indicates that drainage would fall to the south-east.



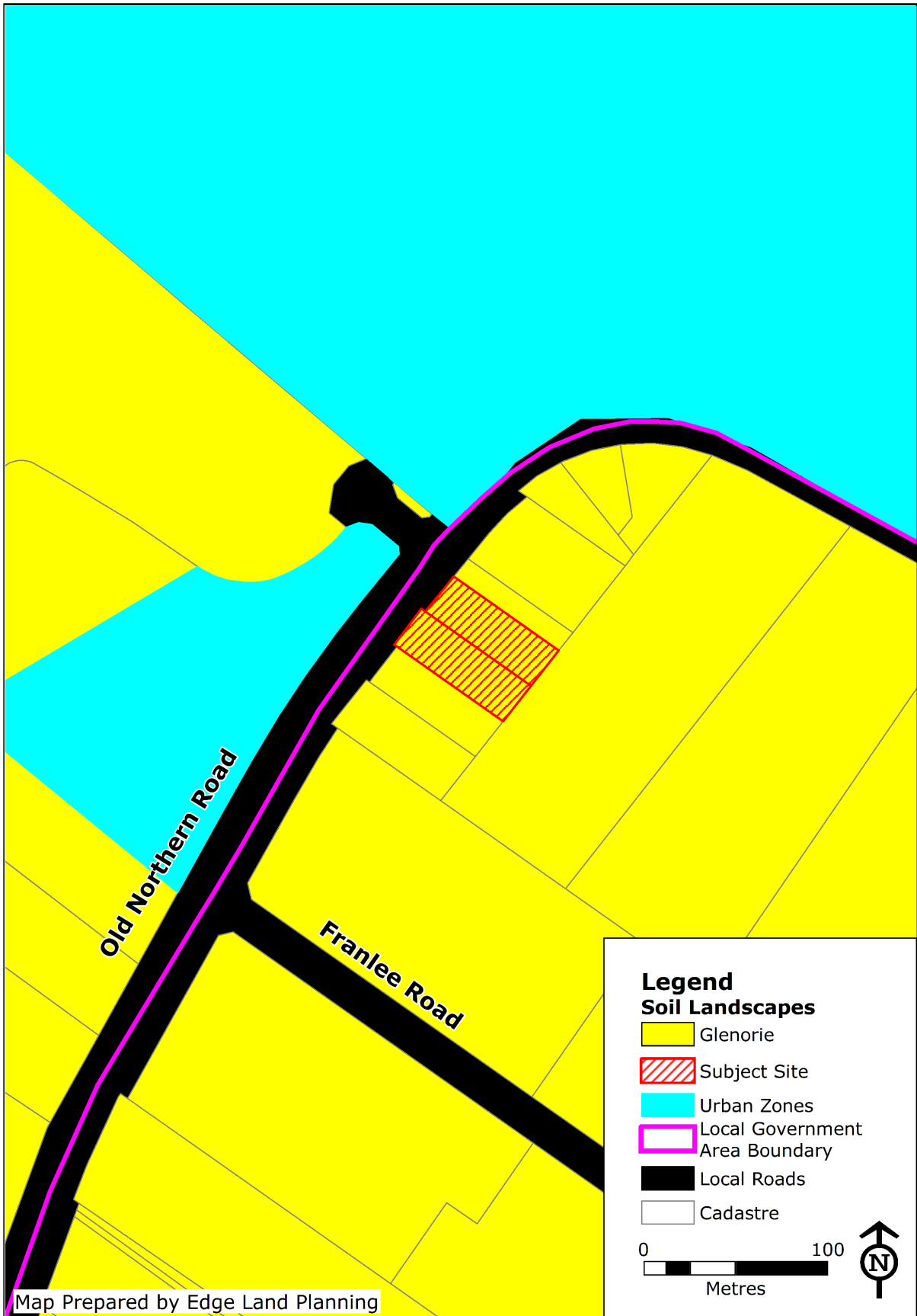
2.4. Soils

The soil landscapes of the Sydney 1:100,000 Map (Chapman, Murphy, Tillie, Atkinson, & Morse, 1989) has been used to derive details about the soils of the site.

There is one soil landscape on the site (Figure 7) detailed below:

- *Glenorie*. This soil landscape covers the entire site. It is described as having undulating to rolling low hills on Wianamatta Group shales with slopes having a gradient of usually less than 5% to 20%. It has low to moderate soil fertility and is extensively cleared tall open forest. The limitations are described as being water erosion hazard, localised steep slopes, localised mass movement hazard, localised surface movement potential, localised impermeable highly plastic soil, moderately reactive. The dominant land use for this landscape is urban with the rural land uses being mostly hobby farms and small rural subdivisions in the Dural area. Its rural capability is for some regular cultivation and grazing.

To summarise, the soils on the site can be described as low to moderate fertility which limit its rural land capability to grazing of cattle and some cultivation.



2.5. Land Use

The land use of the site is residential with large lots of 1,700m² and 1,800m² respectively which is a size more common in residential areas, not rural. However, despite being located on the eastern fringe of the Round Corner Town Centre it is zoned as RU2 Rural Landscape. The land along Old Northern Road to the north and south of the site can be described as urban style ribbon development.

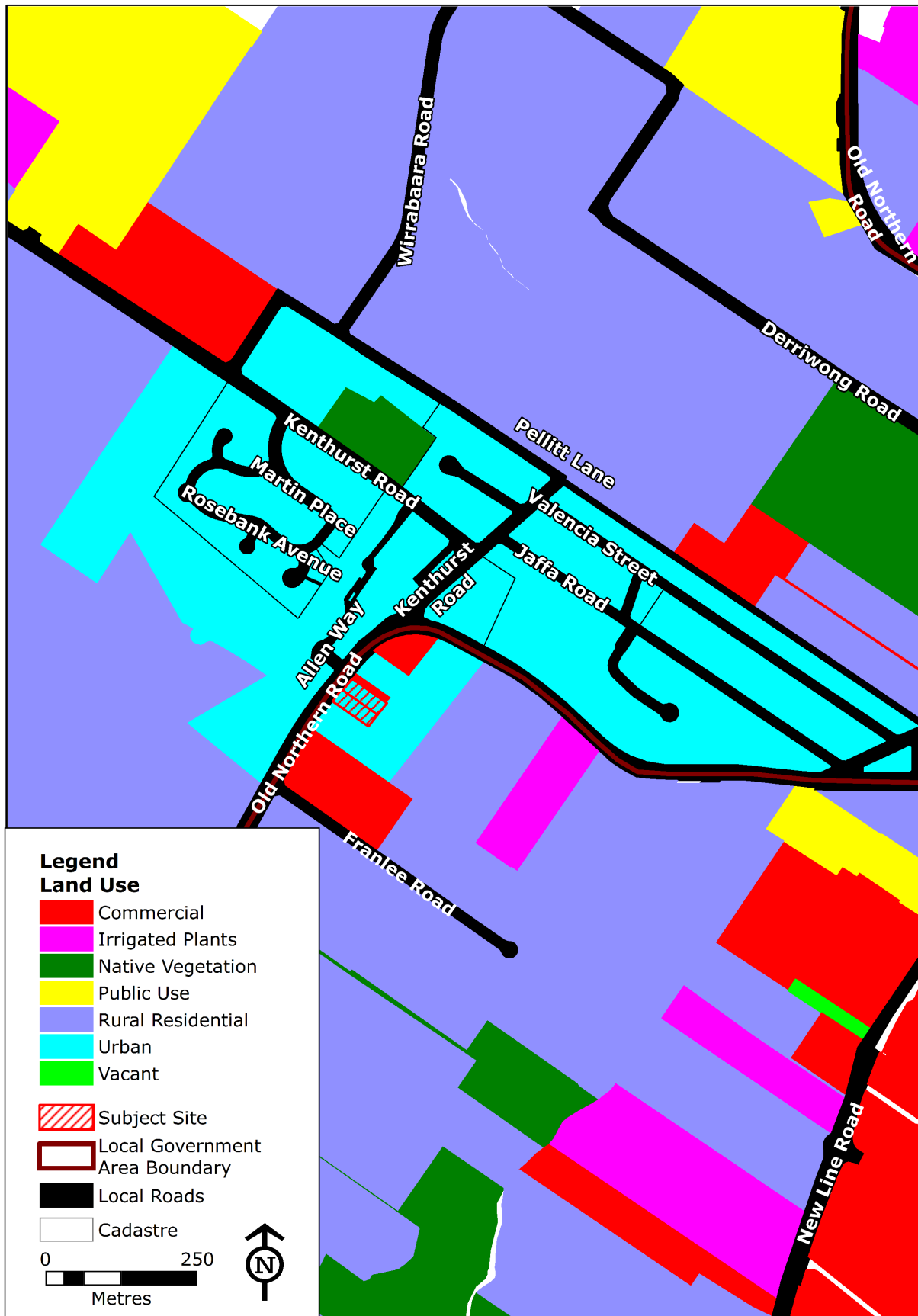
The land use of the land surrounding the site can be seen from Figure 8. The land to the east is the Thompson Health Care Dural House residential aged care facility, to the south is residential and a Child Care Centre with a DA approved 440 seat Maronite Church and community facility on corner of Old Northern and Franlee Roads. To the north is the Dural Veterinary Clinic, residential townhouses and other retail and commercial uses. The land to the west directly opposite the site on Old Northern Road is zoned as urban (B2 Local Centre and R3 Medium Density Residential) and is the Round Corner Town Centre Expansion Site. It is identified in The Hills Shire DCP 2012 as a gateway element to the existing Round Corner Town Centre retail precinct.

Apart from the existing urban area of the Round Corner Town Centre and the urban style ribbon development along Old Northern Road, rural residential development is the most dominant of the surrounding land uses. A definition of this land use can be found in a planning text as follows:

"The residential use of rural land is called rural residential development; that is, people live on rural lots, but use the land primarily for residential rather than agricultural purposes. Although some engage in 'hobby farming', most derive the principal source of their income from pursuits not carried out on the land. The main distinction between urban housing and rural residential housing is bigger lot size and larger distances between dwellings. This creates a sense of openness and of living in the landscape rather than in an urban area. Rural residential dwellings are often large (up to 1000 to 2000 square metres in floor area). They can be found in clusters of new houses and are often mixed with intensive plant and animal uses, which invariably leads to rural land-use conflict. (Sinclair, Docking, Jarecki, Parker, & Saville, 2004) They can have varying degrees of native vegetation cover, from totally covered to totally cleared. This has been termed 'rural sprawl' (Daniels, 2014) because of its pervasiveness over the rural landscape, particularly adjoining the metropolitan areas as well as large cities and towns.

Rural residential development can be divided into two main categories: rural fringe and rural living. Rural fringe development is characterised by single detached houses and dual occupancies on lot sizes of approximately 4000 square metres to two hectares laid out in an estate. This estate usually joins or is in close proximity to an urban area.

Rural living, on the other hand, features single detached houses and dual occupancies on lot sizes between one hectare and 40 to 100 hectares and can adjoin farmland or vegetated areas (it should be noted that there are sometimes lots of less than one hectare). People living on these lots use the land primarily for residential purposes, although they may graze some cattle or have horses. This requires lot sizes of more than two hectares if land degradation is to be avoided. The lots do not adjoin townships or villages and are scattered throughout the rural landscape." (Sinclair & Bunker, 2012)



Chapter 3: Agricultural Suitability

3.1. Introduction

This chapter explores the constraints of the site to assess the current agricultural practices and determine its suitability for agriculture. Information has also been provided on the types of agriculture practiced in the area to gain an understanding of local farming practices and the characteristics of the farming community.

The information contained in this section has been obtained from a number of sources including the ABS Agriculture Census 2016.

3.2. Agriculture in Hornsby Shire

The ABS Agriculture Census 2016 is a good source of information about agriculture in the Hornsby Shire. It outlines the characteristics of farming in the Shire which provide some context to the agriculture suitability of the site. It sits within the Dural – Kenthurst – Wisemans Ferry region which is a Statistical Area Level 2. This also includes land in The Hills Shire to the west of Old Northern Road. This has a similar percentage make up of production to the Hornsby Shire.

The value of agriculture in Hornsby Shire is \$21.7m (ABS, 2018b). The Draft Hornsby Rural Lands Study Background Report (SGS Economics and Planning & RMCG, 2020b) has found that the agriculture includes horticulture (including nurseries, cut flowers and vegetables) and poultry. Agricultural land uses occur mainly north of Dural to Glenorie.

It should be noted that the cut off for those eligible to complete the Agriculture Census is \$40,000 farm gate value and therefore this data only shows an accurate picture of farmers who earn income from the farm. It is also based on farmers who have an Australian Business Number and therefore have a registered business. \$40,000 is a relatively small income given it is less than half of the Australian adult average full time weekly wage of \$1,711.6 (ABS, 2021) which equates to \$89,003.2 per annum.

Table 1 shows the individual commodities which combine to make up the total value of agricultural production. For Hornsby Shire, 75.2% of the value comes from crops (38.0% nurseries, 25.0% flowers, 6.1% vegetables, 4.9% fruit and nuts and 1.2% turf) while livestock makes up the remaining 24.8% (23.5% poultry meat and 1.3% cattle).

The Hornsby Shire's contribution to the Greater Sydney production is 2.7% making it the ninth largest (ABS, 2017b).

Table 1: Value of Agriculture

Commodity	Hornsby	% of LGA
Broadacre Crops	\$157	0.0%
Nurseries	\$8,258,106	38.0%
Flowers	\$5,440,030	25.0%
Turf	\$261,499	1.2%
<i>Nurseries, Flowers & Turf Sub-Total</i>	<i>\$13,959,635</i>	<i>64.2%</i>
Fruit & Nuts	\$1,069,953	4.9%
Vegetables	\$1,328,371	6.1%
Wool	\$1,050	0.0%
Eggs	\$74	0.0%
<i>Livestock Products Sub-Total</i>	<i>\$1,124</i>	<i>0.0%</i>
Sheep	\$1	0.0%
Cattle	\$274,208	1.3%
Pigs	\$1,841	0.0%
Poultry Meat	\$5,106,277	23.5%
<i>Livestock Meat Sub-Total</i>	<i>\$5,382,327</i>	<i>24.8%</i>
Total Agriculture	\$21,741,568	100%

Source: ABS Agriculture Census 2016 (ABS, 2017b)

The Agriculture Census counted 67 farms in the Hornsby Shire having a total area of 1,689 ha making the average farm size in the Shire of 25.2 ha (ABS, 2018a).

Table 2 shows the industry of employment drawn from the ABS Census of Housing and Population (2016) for the rural areas of the Shire, which has been produced by aggregating the Statistical Area Level 1 (SA1) regions for the rural lands. The area covered by these is shown on Figure 9. The table also shows the data for the Shire as a comparison. In the rural area 4.9% of the workforce are employed in agriculture, forestry and fishing which is equal seventh with manufacturing. In the SA1 region around the site, the employment in agriculture is less than that for the rural lands at 2.1% which demonstrates the notion that agriculture is not a significant land use in the South Dural area nor do many people work in the agricultural sector which is also reflected in the Hornsby Shire.

Table 2: Industry of Employment

Industry Sector	Hornsby Shire	% of Total Shire	Rural Land	% of Rural Land
Agriculture, Forestry and Fishing	456	0.6%	197	4.9%
Mining	123	0.2%	19	0.5%
Manufacturing	3,266	4.6%	197	4.9%
Electricity, Gas, Water and Waste Services	526	0.7%	13	0.3%
Construction	4,789	6.8%	565	14.2%
Wholesale Trade	3,047	4.3%	190	4.8%
Retail Trade	6,185	8.7%	391	9.8%
Accommodation and Food Services	3,559	5.0%	190	4.8%
Transport, Postal and Warehousing	1,918	2.7%	121	3.0%
Information Media and Telecommunications	2,539	3.6%	43	1.1%
Financial and Insurance Services	5,017	7.1%	150	3.8%
Rental, Hiring and Real Estate Services	1,256	1.8%	126	3.2%
Professional, Scientific and Technical Services	9,053	12.8%	382	9.6%
Administrative and Support Services	2,232	3.2%	125	3.1%
Public Administration and Safety	3,477	4.9%	127	3.2%
Education and Training	7,600	10.7%	369	9.2%
Health Care and Social Assistance	9,549	13.5%	346	8.7%
Arts and Recreation Services	1,033	1.5%	51	1.3%
Other Services	2,351	3.3%	217	5.4%
Inadequately described/Not stated	2,788	3.9%	171	4.3%
Total	70,791	100.0%	3,990	100.0%

Source: ABS Census of Population and Housing 2016 (ABS, 2017a)

The agriculture situation in Hornsby Shire can be summarised as:

- Two thirds of the agricultural production is nurseries, flowers and turf.
- Nurseries make up 38% of the value of agriculture.
- The rural lands do not have many people who work in farming – only 4.9%% of the rural workforce.

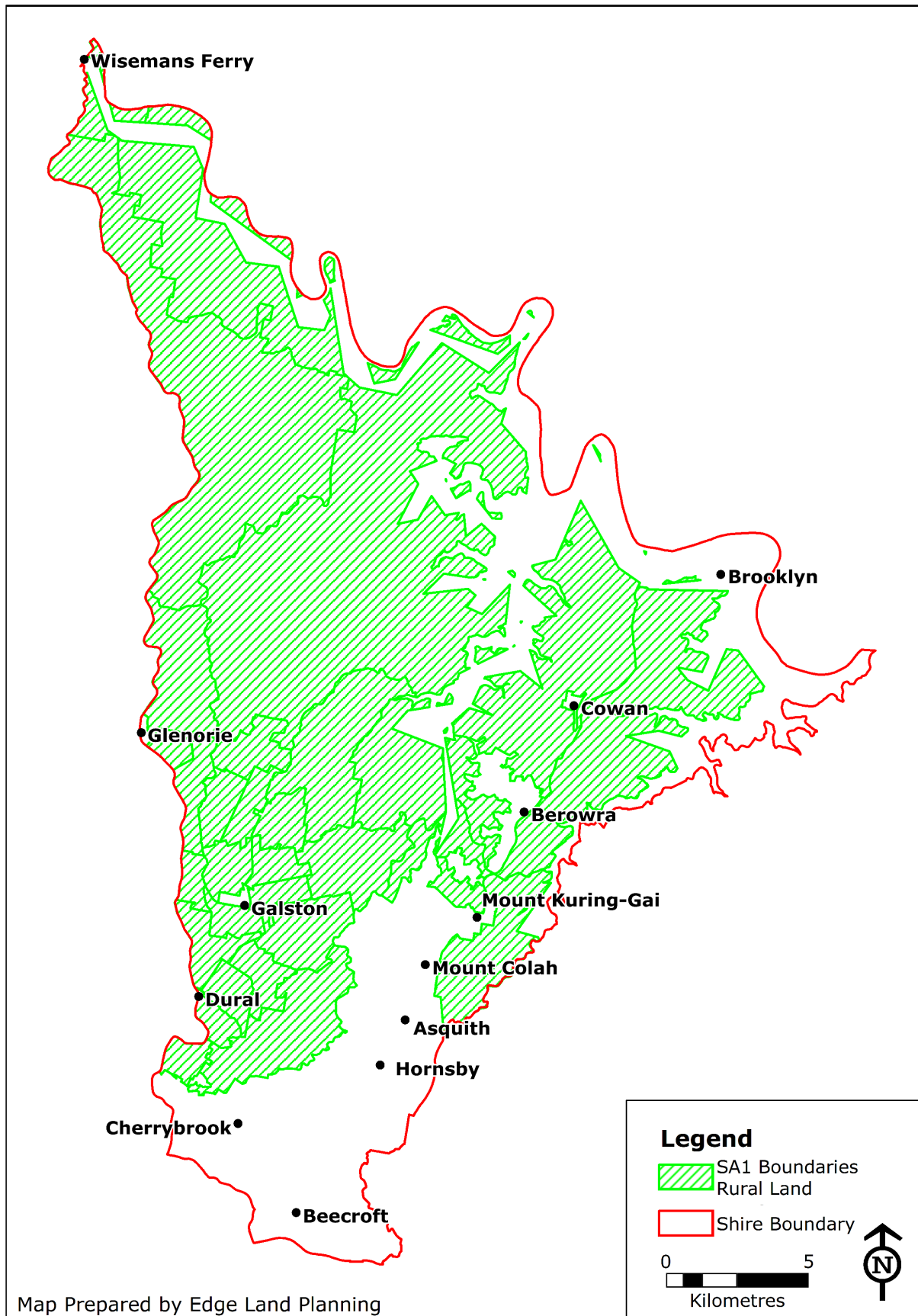


Figure 9: Rural Land SA1 Boundaries

3.3. Constraints for Agriculture

The site has several constraints to be used for agriculture. They are as follows:

- The size of the land.
- The slope of the land.
- Surrounding urban land use.
- Soils.

The major constraint is that it is a parcel of land which does not have any agriculture on it and is used for urban purposes. In addition, the land surrounding the site in all directions has urban uses and any agricultural use of the site would result in land use conflict with the adjoining urban land uses.

3.4. Suitability of the Site for Agriculture

The site is constrained for its use as an agricultural operation by a number of factors, discussed above and outlined further below:

- Size of land;
- Slope of the land; and
- Proximity to surrounding urban development.

The size of the land is the major constraint because at approximately 3,500m², it severely limits the potential of the land to be used for productive agriculture. It is too small for use as intensive livestock agriculture and market gardens.

The only uses which could potentially be on the land are protected cropping and nurseries.

Protected cropping

The site could be used for protected cropping for vegetables or ornamental plants however protected cropping requires structures of 2,000 m² to 2 ha and larger to be profitable depending on the type of technology (NSW Department of Primary Industries, 2018). However, due to the size, protected cropping is the only type that could earn sufficient income. A minimum size for a greenhouse is 2,000m². In addition to the greenhouse, there is a need for a packing shed and coolroom, office, staff amenities and parking as well as truck parking and manoeuvring. It is not considered that there is sufficient room on the site for the greenhouse and the associated infrastructure.

The cost of construction of the greenhouse is approximately \$400,000. The cost of the internal infrastructure is approximately \$350,000 and the shed, carparking and manoeuvring area is approximately \$100,00. This is an upfront total cost of \$850,000, excluding labour costs, prior to any crop production or financial return.

The land has a fall of approximately 6m from the road frontage to the rear of the lots. A greenhouse requires a flat site and so there would be a need for a significant amount of cut and fill to provide a sufficiently flat area for the greenhouse and associated infrastructure. Having regard to the size of the retaining wall, it is marginal if this would be feasible. The cost of the earthworks and associated drainage would be significant. There would also be the need to remove some large native trees and other vegetation

which would require prior approval from Hornsby Shire Council and this would add to the cost of development for a greenhouse.

The land surrounding the site is residential dwellings to the south, a veterinary clinic and townhouse development to the north. Further north and north-west is the Round Corner Town Centre retail precinct. To the immediate east is a newly constructed residential aged care facility by Thompson Health Care. Across the road, to the immediate west, is urban zoned land, known as the Round Corner Town Centre Expansion Site, which has Stage 1 DA approval for a mix of commercial and retail uses and permissibility for residential apartments and townhouses. This land use does not include agriculture. Greenhouses can cause land use conflict from the use of machinery such as forklifts, plant such as high-pressure water cleaning machines, mist blowers and other noise and odour generating equipment. For example, the high-pressure water cleaning machines are used to clean the benches every month and this can take up to 3 hours. Most misters are two-stroke combustion engines and the plant misting (to stimulate plant growth) can take up to one hour to complete and are done two to three times per week. These noises and odours can be characterised as offensive and for that reason, land use conflict will be created. For this reason, it is not considered that a greenhouse will be supported by the surrounding community, adjoining landowners and may not be approved by Council.

The soil landscape is called Glenorie. This soil has low to moderate fertility. However due to the size of the site, soil-based agriculture is not possible.

In reviewing all of the available information, the finding of this report is that the only type of agriculture that is sustainable and can support a family without an appropriate source of off farm income is protected cropping, but this is marginal having regard to the size of the site, its slope and upfront capital costs, all of which make it difficult to construct an adequately large enough greenhouse to be attractive and financially feasible for a future operator.

Chapter 4: Planning Policy Context

4.1. Introduction

The below planning policies and studies apply to the future of the land and will be addressed separately.

- Hornsby LEP 2013;
- State Environmental Planning Policy Primary Production and Rural Development 2019;
- Section 9.1 Local Planning Directions.

4.2. Hornsby LEP 2013

The subject site is covered by Hornsby LEP 2013 which zones the site as RU2 Rural Landscape and partially SP2 Infrastructure.

It has a minimum subdivision size of 2 ha. The zoning table shows that extensive agriculture is permissible without consent and intensive animal livestock and intensive plant agriculture are permitted with consent.

4.3. State Environmental Planning Policy (Primary Production and Rural Development) 2019

This State Environmental Planning Policy (SEPP) came into force in February 2019.

The aims of this Policy are as follows:

- 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 by balancing primary production, residential development and the protection of native vegetation, biodiversity and water resources,
- c) to identify State significant agricultural land for the purpose of ensuring the ongoing viability of agriculture on that land, having regard to social, economic and environmental considerations,
- d) to simplify the regulatory process for smaller-scale low risk artificial waterbodies, and routine maintenance of artificial water supply or drainage, in irrigation areas and districts, and for routine and emergency work in irrigation areas and districts,
- e) to encourage sustainable agriculture, including sustainable aquaculture,
- f) to require consideration of the effects of all proposed development in the State on oyster aquaculture,
- g) to identify aquaculture that is to be treated as designated development using a well-defined and concise development assessment regime based on environment risks associated with site and operational factors.

4.4. Planning Directions

The Department of Planning and Environment have issued a set of Planning Directions pursuant to Section 9.1 of the Environmental Planning and Assessment Act, 1979 which must be followed when a Council is preparing any amendment to its LEP.

The directions that are relevant are:

- Direction 9.1 Rural Zones
- Direction 1.5 Rural Lands

4.4.1. Direction 9.1 Rural Zones

The objective of this direction is as follows:

"The objective of this direction is to protect the agricultural production value of rural land."

This direction states that a Council must not rezone land from a rural zone to a residential, business, industrial, village or tourist zone or increase the density of the land unless it is justified by a study prepared in support of the planning proposal which considers the objectives of the direction.

Comment

This study has demonstrated that due to land size, slope, soil quality and being located on the eastern fringe of the Round Corner Town Centre amongst other reasons outlined in Chapter 3, the site is not suitable for intensive agriculture. The significant upfront capital costs are unlikely to attract a future operator due to the limitations with being able to make an adequate return and to provide a sufficient income to support a family. In considering the findings of the study, the property is not large enough to protect the agricultural production value of the land and there is potential for conflicting land uses in all directions.

4.4.2. Direction 9.2 Rural Lands

The objectives of this direction are as follows:

- (a) protect the agricultural production value of rural land,
- (b) facilitate the orderly and economic use and development of rural lands for rural and related purposes,
- (c) assist in the proper management, development and protection of rural lands to promote the social, economic and environmental welfare of the State,
- (d) minimise the potential for land fragmentation and land use conflict in rural areas, particularly between residential and other rural land uses,
- (e) encourage sustainable land use practices and ensure the ongoing viability of agriculture on rural land
- (f) support the delivery of the actions outlined in the New South Wales Right to Farm Policy.

This direction applies when a Council prepares a planning proposal that affects an existing or proposed rural or environmental protection zone or changes the existing minimum lot size of land in a rural or environmental protection zone.

A planning proposal that affects land in an existing rural zone must:

- (a) be consistent with any applicable strategic plan, including regional and district plans endorsed by the Secretary of the Department of Planning and Environment, and any applicable local strategic planning statement.

Comment

The Greater Sydney Region Plan and the North City District Plan apply to the site. The site is within the Metropolitan Rural Area for the purposes of these plans. The Region Plan states that one of the matters of critical importance is "... the retention of the integrity of the values of the Metropolitan Rural Area and the Protected Natural Area" p12 (Greater Sydney Commission, 2018)

There are a number of Objectives, Planning Priorities and Actions in both documents which are aimed at protecting agriculture and encouraging investment in agriculture and employment. The site is not sui

The Hornsby Shire Local Strategic Planning Statement (LSPS) was adopted in 2020 and sets out several key priorities, one of which relates to rural land as follows:

"7. Protecting and enhancing the environmental value and economic productivity of the Metropolitan Rural Lands in the Shire"

The LSPS has a specific priority related to the rural lands in its Chapter on Sustainability. This is as follows:

SP8. Maintaining and enhancing the environmental, economic and scenic values of the Metropolitan Rural Areas of Hornsby.

The action associated with this priority is to finalise the rural lands study. This was exhibited as a draft document in 2020 and to date has not yet been finalised. The draft Rural Lands Strategy includes a vision and principles which are as follows:

"Hornsby Shire's rural area is valued for its unique landscapes, its biodiversity, and the lives it supports.

Primary production in the rural area is protected and supported by opportunities for value-adding that leverage Hornsby Shire's farming, scenic landscapes, rural amenity and proximity to bushland.

Planning in the rural area manages environmental risk and development constraints." p27 (SGS Economics and Planning & RMCG, 2020a)

There are several principles which support the vision and they are to be considered by Council in any future proposals involving changes to planning controls in rural areas. They are as follows:

*"In the Hornsby Shire rural area:
— Areas for primary production are retained and protected from fragmentation.*

- *Activities on primary production land are flexible, allowing businesses that support productive agriculture to innovate and flourish.*
- *Hornsby Shire's rural area continues to grow as a visitor destination.*
- *Rural scenic landscape values are protected and enhanced.*
- *New development is designed and sited to support and enhance scenic values of the relevant landscape area*
- *The character of rural villages is maintained as important local service and community nodes.*
- *Biodiversity and habitat areas are protected, and conservation measures are enhanced.*
- *Housing choice and housing diversity is provided rural villages.*
- *Housing is provided around villages where it can be connected to services and is supported by appropriate infrastructure.*
- *The transition between rural villages and nearby primary production land is managed.” p28 (SGS Economics and Planning & RMCG, 2020a)*

The draft Strategy adopts a place-based approach and has broken the rural lands of Hornsby Shire into a number of landscape areas. The site is included in the Georges Creek landscape area. The preferred landscape character statement is as follows:

“Georges Creek winds through this landscape area and provides a densely treed backdrop which lends a green and rural feel to the area. In this location, remnant native vegetation is tall, and the dominant vegetation communities are Peppermint-Angophora Forest and Scribbly Gum Open-woodland/Heath.

There is a wide variety of land uses in this landscape area, including urban services (garden centre, auto repairs), retirement living, and rural lifestyle properties. These activities are clustered along Old Northern Road and New Line Road, across from the South Dural Service Centre.

The feel along main roads is one of mixed uses, while travelling down smaller local roads gives a sense of arrival in a rural lifestyle area.

The landscape area abuts nearby urban areas of Glenhaven and Castle Hill. The open space and scattered vegetation, marks a transition to Hornsby Shire's rural area.” p64 (SGS Economics and Planning & RMCG, 2020a)

The draft Strategy then lists four principles which are as follows:

- *“Avoid further land fragmentation on lots covered by an Environmental Management Zone.*
- *Preserve non-urban breaks between villages by avoiding ribbon development along major roads*
- *Recognise and protect productive agricultural land, by limiting further fragmentation and exploring opportunities for rural businesses to value add with activities that are ancillary to, and support, agricultural production*
- *Provide for a range of tourism-related land uses that support the ongoing viability of the agricultural industry” p65 (SGS Economics and Planning & RMCG, 2020a)*

The analysis of the data in Chapters two and three of this report has shown that that the only type of agriculture that could be practiced on the site is protected cropping. However, this is marginal having regard to the size of the site, its slope and upfront

capital costs, all of which make it difficult to construct an adequately large enough greenhouse to be attractive and financially feasible for a future operator. This makes the achievement of the vision, principles and actions of the Greater Sydney Region Plan, the North City District Plan, the Local Strategic Planning Statement and the draft Hornsby Rural Lands Strategy not possible on the site. It is noted that the underlying premise of these visions, strategies and actions is that there is agriculture on the land or that the use of the land will not have a detrimental impact on agriculture. In the case of the site, there is no agriculture on the land nor is there any agriculture on the surrounding land. In fact, the surrounding land is used for a range of mixed urban uses which has been acknowledged in the preferred landscape character statement outlined above.

(b) consider the significance of agriculture and primary production to the State and rural communities

Comment

Agriculture in the Hornsby Shire is not a substantial part of the economy, but it does have some significant nurseries and flower production. However, from an overall standpoint, it is not a significant contributor to the Sydney Region or NSW.

(c) identify and protect environmental values, including but not limited to, maintaining biodiversity, the protection of native vegetation, cultural heritage, and the importance of water resources

Comment

There is limited biodiversity value of the site. A Flora and Fauna Assessment has been prepared by EcoLogical Australia which noted the following about the site:

- It does not contain vegetation mapped as high biodiversity value.
- There are no threatened flora or fauna species records on the site.
- No remnant native vegetation communities will be directly affected by the proposal, and it would not result in the fragmentation or isolation of native vegetation.
- The site is located in a highly disturbed landscape and this limits any use of trees for breeding habitat for threatened microbats or birds.
- The proposed development is unlikely to have a significant impact on any threatened flora and fauna species.

There are not water courses on the site and nor are there any cultural heritage values on the site.

It is therefore concluded that the site does not have any significant environmental values.

(d) consider the natural and physical constraints of the land, including but not limited to, topography, size, location, water availability and ground and soil conditions

Comment

Chapter 2 of this report has outlined the physical characteristics of the site and these have been summarised again in section 3.4 and include the quality of the soils, the

size of the land and the proximity to urban development. These combine to make the land not suitable for ongoing intensive agricultural production which is necessary to derive a suitable income.

- (e) promote opportunities for investment in productive, diversified, innovative and sustainable rural economic activities

Comment

The size of the site and its slope do not allow it to be used for productive agriculture. In addition, the upfront capital costs, and limited return mean that opportunities for investment are restricted as well as conflicting land uses exclude agricultural uses on the site.

- (f) support farmers in exercising their right to farm

Comment

The NSW Right to Farm Policy was published in 2016 and aims to reduce land use conflict by ensuring that agriculture does not cause an impact on adjoining land uses and vice versa. One of the key aspects of this is to ensure that new residential developments do not locate in close proximity to agricultural land uses. It has been noted in section 3.4 that the proximity of the site on the eastern fringe of the Round Corner Town Centre and located adjacent to the existing Round Corner Town Centre retail precinct and the proposed commercial, retail, residential uses on the adjoining lands including the Round Corner Town Centre Expansion Site precludes its use for any form of intensive agriculture. Therefore, any intensive agriculture on the site will not achieve the objectives of the NSW Right to Farm Policy.

- (g) prioritise efforts and consider measures to minimise the fragmentation of rural land and reduce the risk of land use conflict, particularly between residential land uses and other rural land uses

Comment

The land in the vicinity of the site is already fragmented and is surrounded in all directions by urban uses including retail, residential and commercial and that any future agricultural use on the site would result in land use conflicts that would not be supported by adjoining landowners or the community. As a result of this the site is not suited to growing intensive agriculture.

- (h) consider State significant agricultural land identified in State Environmental Planning Policy (Primary Production and Rural Development) 2019 for the purpose of ensuring the ongoing viability of this land

Comment

The land is not identified as State Significant Agricultural Land in the SEPP Primary Production and Rural Development 2019.

- (i) consider the social, economic and environmental interests of the community.

Comment

This is not considered to be applicable because the land is not used for agriculture.

Chapter 5: Conclusion

Healing ONR Pty Limited intends to develop land at 679-685 Old Northern Road, Dural for a health services facility. The site is located on the eastern fringe of the Round Corner Town Centre, comprising of two lots with an area of approximately 3,500m² and is currently used for residential purposes with dwellings located on both lots.

The Hornsby Shire is not known as a significant producer of agriculture. The average size of farms in the region of 25ha ha which is lower than the Sydney Region and NSW. Only 4.9% of the rural workforce is employed in agriculture.

In reviewing all of the available information, the finding of this report is that the only type of agriculture that is sustainable and can support a family without an appropriate source of off farm income is protected cropping. However, this is marginal having regard to the size of the site, its slope and upfront capital costs, all of which make it difficult to construct an adequately large enough greenhouse to be attractive and financially feasible for a future operator.

Bibliography

- ABS. (2017a). *2001.0 Census of Population and Housing 2016 General Community Profile*.
- ABS. (2017b). *7503 Value of Agricultural Commodities Produced, Australia, 2015-16 State, SA4 & SA2 Region*.
- ABS. (2018a). *7121 Agricultural Commodities Australia 2015-16 Australia State & LGA Region*.
- ABS. (2018b). *7503 Value of Agricultural Commodities Produced, Australia, State & Local Government Area 2015-16*.
- ABS. (2021). *6302.0 Average Weekly Earnings Australia, Table 1 Average Weekly Earnings, Australia*.
- Chapman, G., Murphy, C., Tillie, P., Atkinson, G., & Morse, R. (1989). *Soil Landscapes of the Sydney 1:100,000 Sheet*. Sydney: Department of Land and Water Conservation
- Daniels, T. (2014). *The Environmental Planning Handbook for Sustainable Communities and Regions 2nd Edition*. Chicago: Planners Press.
- Ecological Australia. (2021). *679-685 Old Northern Road, Dural – Flora and Fauna Assessment*. Sydney: Ecological Australia
- Greater Sydney Commission. (2018). *Greater Sydney Region Plan A Metropolis of Three Cities - Connecting People*. Sydney: NSW Government
- Hornsby Shire Council. (2020). *Hornsby Local Strategic Planning Statement*. Hornsby: Hornsby Shire Council
- NSW Department of Primary Industries. (2018). *Protected Cropping and the NSW Planning and Approvals Process: A Review*. Orange: NSW Department of Primary Industries
- SGS Economics and Planning, & RMCG. (2020a). *Draft Hornsby Rural Lands Strategy*. Hornsby: Hornsby Shire Council
- SGS Economics and Planning, & RMCG. (2020b). *Draft Hornsby Rural Lands Study - Background Report*. Hornsby: Hornsby Shire Council
- Sinclair, I., & Bunker, R. (2012). Planning for Rural Landscapes. In S. Thompson & P. Maginn (Eds.), *Planning Australia - An Overview of Urban and Regional Planning* (Second ed.). Melbourne: Cambridge University Press.
- Sinclair, I., Docking, A., Jarecki, S., Parker, F., & Saville, L. (2004). *From the Outside Looking In - The Future of Sydney's Rural Land*. University of Western Sydney.