

## Gap Analysis Report

### Planning Proposal Greenwood Place Lennox Head

Prepared for Ballina Shire Council

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rob van iersel + environmental planner

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quality + environmental + planning + solutions  
0419 237 988 + PO Box 2135 Byron Bay NSW 2461 Australia + [rvplanning@bigpond.com](mailto:rvplanning@bigpond.com)  
[www.robvaniersel.com.au](http://www.robvaniersel.com.au)

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## 1. INTRODUCTION

*rob van tassel + environmental planner* has been engaged by Ballina Shire Council to undertake a gap analysis and peer review of documentation relating to a rezoning request which proposes an expansion of the existing residential area at Greenwood Place, Lennox Head.

### PURPOSE OF THIS REPORT

The purpose of this report is to:

- summarise the key technical issues associated with the proposal;
- summarise a review of the documentation submitted by the proponent in support of the proposal; and
- identify any gaps or deficiencies in that information and the additional information required in that event.

### BACKGROUND

#### *Resolution and Gateway Determination*

The most recent Council decision regarding the proposal was on 26 March 2015, where Council resolved:

1. *That Council authorises the submission of a planning proposal, to amend the Ballina Local Environmental Plans 1987 and 2012, to apply an R2 Residential zone over Lot 12 DP 581159 and part of Lot 21 DP 1007134, and alter the Strategic Urban Growth Area boundaries including buffer areas, as indicated in maps which form a part of the planning proposal, to the Department of Planning and Environment for review and Gateway determination.*
2. *The planning proposal to make provision for the proposed R2 zone being subject to a minimum lot size of 800m<sup>2</sup> and the ultimate minimum lot size being subject to further investigation and determination by the Council after public exhibition.*
3. *That upon an affirmative Gateway determination being received, the procedural steps associated with the progression of the planning proposal, including public exhibition, be undertaken.*
4. *That a further report be presented to the Council in relation to this matter following the mandatory community consultation.*
5. *That the Department of Planning and Environment be advised that, at this stage of the process, it is the Council's intention to exercise its delegated plan making functions.*

A Gateway Determination was made on 14 April 2015. It provides the following description of the proposal:

*To rezone Lot 12 DP 581159 and part Lot 21 DP 1007134, Greenwood Place, Lennox Head from RU2 Rural Landscape to R2 Low Density Residential (Ballina LEP 2012) and part Lot 21 DP 1007134, Greenwood Place, Lennox Head from 1(d) Rural (Urban Investigation) (Ballina LEP 1987) to R2 Low Density Residential (Ballina LEP 2012) to permit residential development.*

The relevant conditions associated with this determination are listed below. They inform my review of the adequacy of the documentation submitted in support of the proposal:

1. *Prior to undertaking public exhibition the following studies need to be completed:*
  - *Coastal Zone Impacts and Visual Amenity Impacts Assessment;*
  - *Contaminated Land Assessment;*
  - *Due Diligence Aboriginal Heritage Assessment;*
  - *Flora and Fauna Assessment;*
  - *Geotechnical Assessment (Landslip);*
  - *Mosquito Management Assessment;*
  - *Road Noise Assessment;*
  - *Services and Stormwater Management Assessment; and*

- *Land Use Conflict Risk Assessment.*
2. *Following the preparation of the studies in condition (1) Council should determine an appropriate minimum lot size and prepare a map for public exhibition in accordance with the Standard Technical Requirements for LEP Maps. Council is to provide the Department with a copy of the material for community consultation for approval, as required by section 57(2) of the EP&A Act.*
  3. *Prior to undertaking public exhibition the proposal is to be amended to include a draft Land Application Map and Height of Buildings Map incorporating the land to be rezoned from 1(d) Rural (Urban Investigation). These maps are to be prepared in accordance with the Standard Technical Requirements for LEP Maps.*
  4. *Consultation is required with the following public authorities and agencies prior to public exhibition under section 58(2)(d) of the EP&A Act and/or to comply with the requirements of relevant S117 Directions:*
    - *NSW Primary Industries*
    - *Office of Environment and Heritage*

*Each public authority is to be provided with a copy of the planning proposal and any relevant supporting material, and given at least 21 days to comment on the proposal.*

**Relevant Strategic Plans**

Far North Coast Regional Strategy

The subject land is located within a proposed future urban release area and is also indicated as being within an area of high level constraints under the FNCRS. The proposed rezoning for residential purposes is consistent with this strategy, subject to constraints being able to be mitigated. Constraints in this case consist of potential land slip susceptibility and in respect to the seaward side of the hill (not part of this planning proposal) its visual significance.

Ballina Shire Growth Management Strategy 2012

The Ballina Shire Growth Management Strategy 2012 (GMS) provides the strategic planning context for urban development in Ballina Shire.

The subject land is identified as a strategic urban growth area under the GMS. The proposed rezoning for residential purposes is therefore consistent with Council's GMS.

Lennox Head Structure Plan

The subject land forms part of Candidate Release Area H2 within the Lennox Head Structure Plan.

Area H2 referred to the south-western portion of the "the hill behind the Lennox Head Village Centre" site, described as the land located generally between Greenwood Place and the existing stand of Banksia trees. Subject to more detailed assessment (via the rezoning process) to confirm the area H2 as suitable for development, the Lennox Head Structure Plan proposed the following:

*This area was proposed to be a combination of low and medium density residential development (L2 and M1 pursuant to Ballina LCP No.1) is the preferred use for this site. Any such development would need to ensure adequate buffering for road traffic noise and be well screened from the Coast Road. Access to area H2 is to be via Greenwood Place. A built form of light weight construction with little or no excavation to minimise disruption to the landform, is considered appropriate for this site. Any buildings on this site shall have a building height lower than the red roof of the duplex building to north of site at 14 Blue Horizon Drive, so as to minimise the visual impact of development in this area.*

The minimum subdivision lot size applicable within an L2 area was 600m<sup>2</sup>. In an M1 area, the minimum subdivision lot size was also 600m<sup>2</sup> for a dwelling or 800m<sup>2</sup> for dual occupancy.

The area to the east of area H2, designated as being retained / preserved as landscape / open space within the structure plan, has significant scenic amenity value. Those qualities ultimately lead to an environmental zone being applied to this land in the draft Ballina Local Environmental

Plan. This land is currently designated as a deferred matter within Ballina LEP 2012 and retains its 1(d) Rural (Urban Investigation) zoning under the provisions of Ballina LEP 1987.

#### **REZONING SUBMISSION**

The planning proposal is supported by a report, prepared on behalf of the land owner by Planners North, dated October 2015. The report provides an identification and assessment of the site, a description of the rezoning proposal, and a discussion of site development issues. It provides the information required to address the relevant conditions of the Gateway determination (see above).

A Planning Proposal has also been prepared, which examines the proposal in relation to relevant Environmental Planning Instruments, Section 117 Directions and other statutory planning requirements.

The report concludes that rezoning of the land, as proposed, is appropriate, providing the following justification:

*The subject land has been "on the books" for residential rezoning for some three decades. The proposal is consistent with a raft of strategic planning including:*

- *Ballina Local Environmental Plan 1987 1(d) Urban Investigation Zone designation;*
- *Lennox Head Community Aspirations Strategic Land Use Plan, 2002;*
- *Lennox Head Structure Plan of 2004;*
- *Ballina Shire Affordability Housing Strategy of 2010;*
- *Ballina Shire Growth Management Strategy of 2012. This plan sets out Council's framework for managing population growth in the shire and identifies the land as appropriate for residential rezoning. This plan was endorsed by the Department of Planning and Infrastructure in May 2013;*
- *For North Coast Regional Strategy; and*
- *Ballina Shire Community Strategic Plan.*

*Further, zoning amendment as proposed is generally consistent with relevant State Environmental Planning Policies and the Directions issued by the Minister under Section 117 of the Environmental Planning and Assessment Act.*

*Having regard to the above strategic planning context and further research completed post-gateway approval, we respectfully submit that this Planning Proposal is another step forward in the orderly and economic development of the Shire and warrants support.*

## **2. THE PLANNING PROPOSAL**

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The planning proposal relates to land located at Lennox Head, adjacent to the intersection of Byron Bay Road and Greenwood Place. The site comprises Lot 12 DP 581159 and part Lot 21 DP 1007134.

The proposal seeks to amend Ballina Local Environmental Plan 2012 (BLEP 2012) by rezoning the land from RU2 Rural Landscape to R2 Low Density Residential. It also seeks to amend Ballina Local Environmental Plan 1987 (BLEP 1987), which currently applies to a small part of the site at its eastern edge, by including that area within BLEP 2012 with a zoning of R2 Low Density Residential.

In addition to the zoning change, the proposal requests that the following LEP Maps be amended:

- Lot Size Map, with the application of a 600m<sup>2</sup> minimum lots size over the land;
- Building Heights Map, by applying a maximum height of 8.5m over the land; and
- Strategic Urban Growth Area Map, by removing the land from this map.

### 3. RELEVANT PLANNING ISSUES

#### GATEWAY ISSUES

The primary issues associated with the rezoning of the land as proposed are those outlined in the Gateway determination (14 April 2015):

- *Coastal Zone Impacts and Visual Amenity Impacts assessment;*
- *Contaminated Land Assessment;*
- *Due Diligence Aboriginal heritage assessment;*
- *Flora and Fauna assessment;*
- *Geotechnical Assessment (Landslip);*
- *Mosquito Management Assessment;*
- *Road Noise Assessment;*
- *Services and Stormwater Management Assessment, and*
- *Land Use Conflict Risk Assessment.*

These issues have been addressed on behalf of the proponent in the report prepared by Planners North, dated October 2015.

#### Coastal Zone and Visual Amenity

The report notes that, while the site is located within the coastal zone, it is some 500m landward of, and elevated well above, the active beach zone. As such, the site is unlikely to be affected by coastal processes, and visual amenity is the primary consideration.

The rezoning submission is supported by a Visual Amenity Assessment, prepared by design team ink, dated July 2015.

The visual assessment has been completed within the context of SEPP 71 matters for consideration; the NSW Coastal Policy 1997; the NSW Coastal Zone Design Guidelines 2003; and the Lennox Head Structure Plan 2004.

The design team ink report provides a detailed analysis of the existing visual amenity, and analyses the nature of the site as viewed from various public vantage points within the coastal zone. In order to minimise the impact to the proposed development from key viewing locations, the following specific measures have been recommended by design team ink:

- *In addition to compliance with the Ballina Shire Council LEP maximum building heights and DCP building height planes, the maximum finished height of any part of the roof of a building on any lot should not be above the level of the highest part of the roof of the duplex located at 14 Blue Horizon Drive.*
- *The design of the building on proposed lots 7 and 10 should ensure that no parts of the building can be seen from any part of the village centre, Pat Morton Lookout, Lennox Headland, the coastal reserve or above the crest of the hill behind Lennox Head.*
- *Acoustic treatments along the Coast Road should result in a soft landscape outcome where vegetation is the predominant element.*
- *A vegetated screen at least 5m wide should be incorporated along the entire southern edge of the development and wrap up the eastern boundary for a distance of at least 45m. The screen should be planted with locally native species to achieve an overall screening height of at least 8.5m above natural ground level.*
- *Street trees of at least 8m mature height should be included within the subdivision.*
- *Planting of trees and shrubs to visually screen to a height of 6m should be included within the Greenwood Place road reserve in front of Lot 9 to prevent views into the urban lots from the Coast Road.*
- *Strengthen the ecological integrity and potential longevity of the patch of mixed Banksia vegetation to the east of the Site by undertaking weed management and planting over a 2 year period. Fencing of this vegetation to protect from livestock is recommended.*

- *Minimise 'sky-glow' from lighting by selecting luminaires which emit off-white light. Ensure all street lighting is facing downwards and includes glare shields.*
- *A built form of light weight construction with little or no excavation to minimize disruption to the landform, is considered appropriate for the site.*

The report notes that the existing visual character of the site will change from rural to urban, but that, subject to adoption of the recommendations, the urban development of the site will not result in significant detrimental impacts on the visual amenity of the locality. Importantly, the report notes that development within the zoned area will not intrude into the skyline when the hillside is viewed from the Lennox Head Village Centre.

The design team ink report includes the recommendation originally contained within the Lennox Head Structure Plan that:

*Any buildings on this site shall have a building height lower than the red roof of the duplex building to north of site at 14 Blue Horizon Drive, so as to minimise the visual impact of development in this area*

The site levels adjacent to the site at 14 Blue Horizon Drive are at around the same level as that adjoining property, or slightly lower. The remainder of the site is lower in elevation.

The BLEP 2012 Height of Buildings Map specifies a maximum height of 8.5m for buildings on the site. It is considered that this existing control will be adequate to ensure that the objectives regarding visual impact can be achieved. This can be confirmed at development application stage.

On the basis of the assessment, *Coastal Zone Impacts and Visual Amenity Impacts* do not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

#### **Contaminated Land**

The rezoning submission is supported by advice from Coffey Geotechnics Pty Ltd, dated June 2015, addressing both geotechnical and contamination issues. The advice is based on a review of their previous assessments, undertaken in 2008.

The 2008 investigation was a Phase 1 Environmental Site Assessment (ESA) of the whole of the land.

*The Phase 1 FSA found that the site (1 of 21 DP1007134 and 1 of 12 DP581159) has been used for cattle grazing since at least the 1960's to the present day. The larger portion of the site, Lot 21, has been owned by the Condon family since 1964. The smaller portion of the site, Lot 12, has been owned by the Roman Catholic Church since 1976 and the Condon family from 1964 to 1976. Based on information provided by the titles search, it appears that the site has been owned by farmers since being granted between 1880 and 1890.*

The ESA also involved collection and analysis of soils samples from across the site.

*The results of the laboratory testing showed manganese concentrations exceeding the adopted soil investigation levels for human health and provisional phytotoxicity in numerous samples (13 of 19 samples). It is considered that these manganese concentrations are representative of natural background levels and are derived from weathering of the parent basalt rock material common in this area. Generally, basalt contains between 5% and 12% Manganese Oxide (MgO wt%). Manganese is considered to be relatively non-toxic to animals, but can be toxic to plants at higher levels. Manganese is more commonly known for causing nuisance problems in water supplies with the staining of washing and bathroom fixtures*

*The remaining samples showed concentrations of other contaminants below the adopted soil investigation levels.*



*The Phase 1 ESA identified no areas of environmental concern (AECs). Based on the findings of the Phase 1 ESA, and sampling and analysis of the soils, it is considered that the site has a low potential for contamination.*

On the basis of this report, *Contaminated Land* does not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

#### **Aboriginal Heritage**

A Cultural Heritage Due Diligence Assessment was undertaken by Everick Heritage Consultants Pty Ltd in August 2015. The assessment included consultation with the Jali Local Aboriginal Land Council (JALC), including a site walk undertaken with a Jali Sites Officer familiar with the places of significance within the Ballina and Lennox Head areas.

No Aboriginal Objects or places were located during the inspection and Jali LALC did not indicate that any places of significance were known to exist within any parts of the project area.

The assessment also notes:

*The known distribution of Aboriginal sites throughout the region is clustered on the estuary, wetlands, sand dunes and sand sheets of the coastal plain between the Richmond River and Broken Head. Little evidence of Aboriginal cultural heritage has been found on low hills composed of basalt derived soils between the shoreline and Nowrybar wetlands on which the Project Area is located and the vast expanse of low hills broadly described as the Alstonville plateau to the west. The exception within the area defined above has been sand based soil conditions as exist in the Angels Beach estates where Aboriginal cultural heritage has been extensive in terms of the numbers, variety and contents of Aboriginal sites.*

The assessment further notes that the site has a history of high levels of ground disturbance over the majority of its surface. As such, the report suggests that further archaeological works within the site would not be warranted.

They note, however, that the Jali LALC have recommended that their representative be on site during future ground disturbance.

The assessment has been reviewed by the NSW Office of Environment and Heritage (OEH), who support the conclusions of the report.

On the basis of this report, *Aboriginal Heritage* does not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

#### **Flora and Fauna Assessment**

Peter Parker Environmental Consultants Pty Ltd have undertaken the flora and fauna assessment to support the proposed rezoning. The assessment included vegetation surveys undertaken in 2008 and 2015. It concludes:

*The site is dominated by exotic grasses and shrubs and is ecologically insignificant. The rezoning and subsequent subdivision will not have a significant effect on threatened species, their habitats or endangered ecological communities.*

The assessment also included targeted searches for Hairy Joint Grass (*Arthaxon hispidus*), a threatened plant species known in the area. It was not found on the site.

The assessment also examined the potential for fauna habitat and concluded that no significant habitat exists on the site.

In reviewing the assessment, the NSW Office of Environment and Heritage (OEH) noted that the footprint of the planning proposal adjoins a patch of vegetation to the east, but that the report has not identified nor assessed the significance of this vegetation. There is potential that the intensification of land use that will follow a rezoning could result in indirect impacts to this vegetation.

Given that the vegetation is, however, outside of the area proposed to be rezoned, it is considered that the issue relates to the provision of an appropriate buffer, based on an assessment of its biodiversity values. That assessment can be dealt with at development application stage.

Council's Environmental Scientist has also reviewed the ecological assessment, noting:

*In relation to the protection of the vegetation growing in the eastern portion of the development site, it is considered although the vegetation is in a degraded state any future development for the site should ensure the vegetation is retained, buffered and rehabilitated. As a consequence, the applicants preferred subdivision layout that includes Lot 18 is not supported. The proposed acoustic barrier should be designed to ensure it does not have any impact on any native vegetation growing near its alignment. This issue has not been assessed by in the EPR.*

The issues raised regarding lot layout and design of acoustic barrier can be determined at Development Application stage.

It was also noted that *site inspections have confirmed the south western portion of the site represents a surface intersection with the groundwater. The development of this area will require further consideration to ensure the groundwater will not affect the constructability of the subdivision.*

This is also an issue that can be adequately addressed at development application/ design stage, and does not prevent the progress of the planning proposal.

On the basis of the report submitted, therefore, *biodiversity* does not present an impediment to the rezoning of the site, and no further information is required at this stage of the process

#### **Geotechnical**

The rezoning submission is supported by a Geotechnical Investigation Report, prepared by Coffey Geotechnics Pty Ltd. The report notes that a previous detailed assessment of the land was undertaken in 2008, associated with a proposed rezoning of a wider site. Their review of the 2008 report notes that there have not been any changes since 2008 that would warrant further detailed analysis.

The 2008 investigations included the test holes across the site, with laboratory tests carried out to assess the material parameters of the site's soils. It also included a slope hazard assessment.

The review of the 2008 report allowed Coffey geotechnics to conclude that the Assessed Landslide Risk to property is very low

On the basis of this report, *Geotechnical issues* do not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

#### **Mosquito Management**

The rezoning submission is supported by a Mosquito Impact Assessment report prepared by Mosquito Consulting Services Pty Ltd, dated July 2015.

The assessment notes that the site does not contain any mosquito breeding habitat and that the closest known mosquito hazard/ breeding area is located on Henderson land, at least 400m to the west. It further notes that Byron Bay Road provides at least 30m separation from other potential mosquito sites, and concludes that the site is not likely to be subject to significant mosquito risk.

On the basis of this report, *Mosquito Management* does not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

#### **Road Noise Assessment**

CRG Acoustics have provided a report, dated July 2015 to support the proposed rezoning. The report notes:

*In undertaking the detailed assessment, unattended road traffic noise measurements were conducted for the site, and through 3D road traffic noise modelling, future road noise impacts from The Coast Road were produced. The 3D road noise model incorporates the site and surrounding land topography and road grades which play an important role in the propagation of traffic noise to the subject site.*

Based on the noise measurements, future traffic predictions and future noise modelling, the report recommends the construction of an acoustic barrier/ earth mound height of 2.0m along the Coast Road frontage of the site. It notes, however, that appropriate building shell treatment will be required for future dwellings, both at ground and first floor levels.

Based on this report, it is reasonable to conclude that successful noise reduction treatments can be determined, and the detail of such treatment can be developed, based on further detailed assessment, at future subdivision application stage.

On the basis of this report, Road Noise does not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

#### **Services and Stormwater Management**

GeoLINK have provided a Services Report to support the rezoning.

##### Water Supply

The report notes that there is an existing water supply service in the vicinity of the site, with a supply main running in a north-south direction along Greenwood Place, along the western boundary of the site and across the Coast Road to Greenfield Road. Other mains exist within the Coast Road.

The site is within the area proposed to receive recycled water from the Ballina Shire recycled water network. As such, the development needs to be designed and constructed with a dual water supply. The recycled water supply is not yet available at the site.

The 'peak day' water demand has been calculated, based on anticipated subdivision yields, at 36 kL/day for drinking water and 21 kL/day for recycled water. The 'peak instantaneous' water demand is calculated as 2.6 L/s for both drinking water and recycled water.

The potential for future development of the subject site was taken into account in the development of Council's Development Servicing Plan (DSP) – Water Supply Infrastructure. The site was identified as site 'LH6' in the DSP and assigned an estimated demand of 30 ET. The suggested subdivision layouts provided to support the rezoning are significantly less than 30ET.

No upgrades to the existing water supply network are required as a result of the proposed development, aside from those already planned and costed as part of the DSP.

##### Sewerage

There is an existing sewerage network in the area, with three existing sewage pumping stations that could be used. All wastewater from Lennox Head is ultimately transferred to the Lennox Head Sewerage Treatment Plant, located west of Skennars Head.

The proposed development would generate an additional design load of approximately 2.09 L/s to the existing sewerage network. This comprises a peak dry weather flow of 0.91 L/s, groundwater infiltration flow of 0.04 L/s and an inflow and infiltration flow of 1.24 L/s.

The potential for future development of the subject site was taken into account in the development of Council's Development Servicing Plan (DSP) – Wastewater Infrastructure. The site was identified as site 'LH6' in the DSP and assigned an estimated demand of 30 ET. The suggested subdivision layouts provided to support the rezoning are significantly less than 30ET.

Depending on connection to one of the three existing pumping stations, there would either be no or minimal upgrades to existing infrastructure. Details of that connection can be addressed at subdivision stage and do not impede the rezoning of the land.

#### Stormwater

There are existing stormwater pit and pipe networks in the vicinity of the site that could be used to service the site.

In order to gain development approval, subdivision of the site would need to demonstrate that peak stormwater flows leaving the site in the post-development situation do not exceed the predevelopment peak flows.

A standard stormwater collection and conveyance system would be suitable for the proposed development. This would comprise kerb inlet pits and underground pipes for conveyance of minor storm flows, combined with overland flow paths along the roads for conveyance of major storm flows.

Based on the potential allotment layouts prepared in support of the rezoning, the development is likely to have impervious surfaces (i.e. roof, road pavement) covering approximately 35 – 50% of the site.

The potential allotment layouts identify a 'proposed detention' area in the south-western corner of the site. This implies that the proposed approach to stormwater management would be the provision of a stormwater basin to provide detention and treatment of stormwater at this location.

On-Site Stormwater Detention may no longer be required pursuant to Council's contemporary Stormwater Management Standard for Development. It is apparent, however, that stormwater will be able to be managed in accordance with Council's requirements. This can be a matter for design at Development Application stage.

#### Electricity

There is an existing overhead power line running along the western boundary of the site. An electricity pole with a transformer is located approximately in the location of the proposed road connection to Greenwood Place.

It is likely that the existing transformer would need to be upgraded, but there are no apparent impediments to that upgrade.

#### Telecommunications

An existing network is in place and can accommodate the anticipated development.

On the basis of GeoLINK's report, *Servicing and Stormwater* do not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

#### **Land Use Conflict Risk**

The Land Use Conflict Risk Assessment (LUCRA) prepared by Land & Fire Assessments Pty Ltd dated June 2015 considers two potential subdivision layout options and addresses Council's DCP requirements.

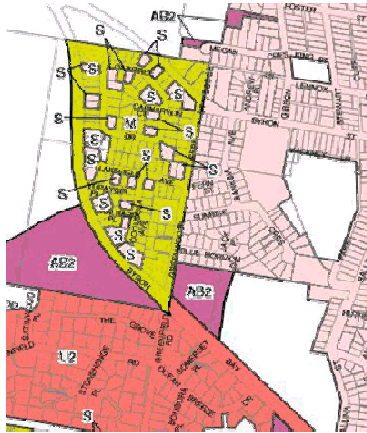
The potential for conflict arises as the residue of Lot 21 (land east of the subject site) will remain as cleared land with low scale cattle grazing. Having residential lots abutting rural lands used for cattle grazing can raise a number of land use conflicts for future residents.

The LUCRA demonstrates that the potential for conflict can be managed through the subdivision design process, to provide appropriate buffers between residential lots and the adjoining rural land.

As such, Land Use Conflict does not present an impediment to the rezoning of the site, and no further information is required at this stage of the process.

**RESIDENTIAL LOT SIZE**

The figure below is an extract from the Ballina Local Environmental Plan 2012 Lot Size Map for this locality.



The relevant existing minimum lot sizes in the locality are:

- S 800m<sup>2</sup> Applies to most of 'The Village' areas; to the area immediately adjoining the site; and nominated lots to the west;
- M 600m<sup>2</sup> Applies to most of the lots west of the site; and
- U2 1200m<sup>2</sup> Applies in the Greenfield Rd subdivision to the south.

Despite a minimum lot size of 800m<sup>2</sup> applying to land north of the site (fronting Blue Seas Parade), the average lot size immediately adjoining the site boundary is approximately 650m<sup>2</sup>.

Lots to the north-west, where a 600m<sup>2</sup> minimum lot size dominates, have an average size of 720m<sup>2</sup>.

Council's resolution of 26 March 2015 suggested a minimum lot size of 800m<sup>2</sup> for the site, but indicated that the ultimate lot size could be considered following public exhibition.

The proponent has provided two concept layout plans, shown below, one based on an 800m<sup>2</sup> lot subdivision approach, which yields 14 lots, and another based on a minimum 600m<sup>2</sup> lot area, yielding 18 lots.

The final subdivision pattern would need to be further refined at Development Application stage.



However, both layouts are considered to be generally consistent with the existing subdivision pattern and residential character of the locality.

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Residential Expansion – Greenwood Place, Lennox Head

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A yield based on 600m<sup>2</sup> minimum lot size optimises the use of the land, and could therefore be supported. It is recommended that both lot size options be included in the public exhibition of the planning proposal, to allow for community comment regarding the issue.

**4. CONCLUSION**

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Based on the assessment of the documentation submitted in support of the planning proposal, no further information is required prior to the public exhibition of the proposed rezoning.

**Rob van Iersel**