Submission No 105

INQUIRY INTO RURAL HOUSING AND SECOND DWELLINGS REFORM

Organisation: Shoalhaven City Council

Date Received: 24 October 2025

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Council Reference: 31157E (D25/463104)

24/10/2025

By email only: ruralhousing@parliament.nsw.gov.au

Attention: Select Committee on Rural Housing and Second Dwellings Reform

Dear Members of the Committee

Submission - Select Committee Inquiry on Rural Housing and Second Dwellings Reform

Shoalhaven City Council appreciates the opportunity to provide comment on the Select Committee Inquiry on Rural Housing and Second Dwellings Reform. The attached submission has been prepared by staff.

The submission is generally not supportive of the proposed reforms being considered by the Inquiry to the extent that they seek to override Council's local planning framework and instead recommends that provisions seeking to increase rural residential development and housing supply options should not be introduced until relevant strategic planning work has been completed. Under Shoalhaven Local Environmental Plan (LEP) 2014, opportunities are currently provided for the construction of a second dwelling on rural land in certain circumstances. Most of these opportunities/provisions were established through the Rural Plan Amendments to the then Shoalhaven LEP 1985 that were completed in mid-1999 following detailed investigation/consideration and widespread landowner, community and Government Agency consultation and engagement. The provisions were reviewed and continued through the Shoalhaven LEP 2014. It is considered that any changes in this regard, if warranted, are most appropriately considered and implemented at the local level and not through a potential 'one size fits all' approach at a state level. Further matters are also raised and discussed in the submission.

If you need further information about this matter, please contact City Development on . Please quote Council's reference 31157E (D25/463104).

Yours faithfully

Director - City Development (Acting)

Attached: Shoalhaven Staff Submission - Select Committee Inquiry on Rural Housing and Second Dwellings Reform

Shoalhaven City Council – Staff Submission

Inquiry into Rural Housing and Second Dwellings Reform

General Opening Comments

Council appreciates the opportunity to make this submission to the Select Committee on Rural Housing and Second Dwelling Reform.

Like many regional councils in close proximity to Sydney, Shoalhaven City Council faces ongoing pressure to increase rural residential development opportunities and balance this with agricultural land security, protection of natural resources and consideration of natural hazards. Agricultural production, including supporting industries,[1] provide a high proportion of Gross Value Production (GVP) for the Illawarra Shoalhaven Region (76% / $73.9m in 2020/1) and 11% of the state's milk production is produced in the Illawarra / Shoalhaven region. The Shoalhaven's tourism and hospitality industry sector had a total value-added income in 2021/22 of $358m with agritourism being the fastest growing sector,[2] providing primary producers opportunities to supplement income and diversify their business. However, increased pressure on rural land to accommodate residential development is a major risk to retaining rural industries and important rural landscapes, impacting producers, the agricultural industry and the region.

The need to increase housing supply and diversity in the effort to address overall housing affordability is also acknowledged. However, there are reservations about the potential for the proposed reforms to meaningfully help address overall housing supply or affordability needs. In this regard it is important that good planning decisions are also made. Council consistently seeks to enable additional housing in appropriate areas, close to centres, jobs and serviced with existing and planned infrastructure, striking the right balance between increasing supply and diversity of housing whilst minimising negative impacts on rural industries and scenic quality, avoiding natural hazards (e.g. flooding and bushfire), and protecting valued natural assets.

Under Shoalhaven Local Environmental Plan (LEP) 2014, opportunities are currently provided for the construction of a second dwelling on rural land in certain circumstances. For example, *dual occupancy (attached)* is permitted with consent in the RU1, RU2, RU4, RU5, C3 and C4 zones. *Dual occupancies* (*detached)* are also permitted with consent in the RU5 zone. *Rural workers dwellings* are currently permitted with consent in the RU1 zone. *Secondary dwellings* are currently not permitted in any of the applicable zones that are the focus of these reforms. Most of these opportunities/provisions were established

[1] DPI. Agriculture Industry Snapshot for Planning (2020)
[2] Destination Sydney Surrounds South. Agritourism

through the Rural Plan Amendments to the then Shoalhaven LEP 1985 that were completed in mid-1999 and that followed detail landowner, community and Government Agency consultation and engagement. The provisions were reviewed and continued through the Shoalhaven LEP 2014.

The proposed reforms seek to broaden permissibility and simplify approvals of 'second dwellings' on rural land, despite any established local planning provisions. Council generally does not support such a proposal to the extent that it is inconsistent with the local planning framework and cautions against a 'one-size-fits-all' approach to rural residential development for reasons set out in this submission.

In Shoalhaven, it is envisaged that future strategic planning work will consider rural housing opportunities, this includes work on a city-wide Housing Strategy and a Rural Lands Strategy. When these strategies are prepared Council can and will review the types of dwellings currently allowed in rural zones, examine the community's housing needs, and identify opportunities to respond to these needs. This work will allow Council to investigate and determine appropriate ways to enable dwelling supply in rural areas through its strategic land use planning processes to ensure the best overall outcomes for our community.

Recommendations:

- Proposals to increase rural residential development and housing supply should not be introduced until relevant strategic work has been completed by Council.
- Councils hold considerable local knowledge and is best placed to accurately determine land constraints and suitability within their Local Government Areas and as a result any changes to development outcomes on rural land are most appropriately considered/managed through Council's local planning instruments (Local Environmental Plan and/or Development Control Plan).

Additional comments – Terms of Reference

The following comments and recommendations are provided in response to the points (a) to (i) listed in the inquiry Terms of Reference.

(a)	Planning instruments and development controls to facilitate the construction of second dwellings in rural zones in New South Wales, excluding Greater Sydney, with an emphasis on Outer Metropolitan Local Government Areas, and in particular the document entitled "State Environmental Planning Policy (Housing) Amendment (Second Dwellings in Rural Zones) 2025"

Council Response:

The tabled document *State Environmental Planning Policy (Housing) Amendment (Second Dwellings in Rural Zones) 2025* (the draft instrument) does not differentiate between land in the focus area of "Outer Metropolitan LGA's excluding Greater Sydney" and any land in the applicable land use zones throughout NSW, consequently it is unclear where the reforms are intended to apply.

The term *rural zone* is defined in the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* (Codes SEPP) as meaning LEP land zones RU1, RU2, RU3, RU4, RU5 or RU6. However, as the term 'rural' in isolation is not known to be a defined term in any NSW Planning Instrument, it would broadly be interpreted to mean areas of land not densely populated or intensively developed.

Zones C3 Environmental Management and C4 Environmental Living are currently within scope of the proposed reforms but are not defined as *rural zones* in the Codes SEPP, or *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) or the NSW Standard Instrument LEP. The intention to include conservation zones, which have quite distinct planning considerations, in the definition of a *rural zone* requires further clarity and consideration and the resultant implications on other land use planning controls are relevant and necessary.

The proposed new term 'second dwelling' appears to encompass existing land use planning terms, such as a *dual occupancy.* However, it is unclear how 'second dwelling' will relate to other residential accommodation typologies (e.g. *secondary dwelling, rural worker's dwelling*). Introduction of a new residential land use term could increase complexity or uncertainty in existing planning systems. There may also be potential for the proposed amendments to facilitate a reduction in rural workers accommodation in favour of other rural residential development.

In this regard, addition consideration and clarity is needed regarding the circumstances when a 'second dwelling' will be considered or permissible. In Shoalhaven rural dwelling entitlements are complex and not every rural lot benefits from a dwelling entitlement or

an existing legal dwelling. As such it is assumed that to have a 'second dwelling' you will need to have an existing legal dwelling or the potential for one – this needs to clarified and considered more closely should any changes be considered or proposed.

Recommendation:

- Provide clarity on the geographical areas where any proposed amendments are actually intended to apply.
- Carefully consider how any new land use terms will interact with existing land use terms to ensure clarity and consistency through all planning instruments.
- Carefully consider and if needed clarify the circumstances where a 'second dwelling' (or whatever term is ultimately used) is permissible - this should only be in particular circumstances where there are legally permissible dwellings in the appropriate zones.
- References to the Building Code of Australia may instead need to refer to the National Construction Code.

(b) Potential amendments to the State Environmental Planning Policy (Housing) 2021 (Housing SEPP), the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP), and related instruments to enable flexible, streamlined, and liberalised approval pathways for second dwellings on rural-zoned land

Council Response:

The Codes SEPP and Housing SEPP approval process relies on development meeting predetermined standards, removing the requirement for a development application, based on the premise that the impacts are known, low risk and straightforward. Generally, development utilising these pathways is considered by private accredited building certifiers who ensure building work complies with codes and standards. Broadening the scope of development delivered via these pathways means that certifiers are likely to be required to interpretate increasingly complex legislation. The premise of streamlined approvals on some of the state's most valuable resource land or land that is affected by natural hazards is arguably not low risk and straightforward and the reliance on building certifiers to evaluate impacts on agricultural land capability, biodiversity and other complex land constraints though a fast-tracked liberal pathway raises some obvious concerns.

The non-discretionary standards proposed in the draft instrument appear to be inconsistent with other non-discretionary standards that relate to development typologies on rural land, such as the rural land sharing community provisions in the

State Environmental Planning Policy (Primary Production) 2021, the Agritourism and Farm Stay Accommodation Code and Rural Housing Code in the Codes SEPP. Potential inconsistencies at the state policy level may not result in optimal or straightforward development outcomes.

The setbacks proposed in the draft instrument are generally not considered adequate in rural areas and may result in conflicts between existing and proposed development or existing built form. The proposed front and side setback arrangements are more consistent with the setback pattern of development on urban zoned land (e.g. R1, R2, and R3). Introducing such a setback pattern will risk increased land use conflicts with agricultural operations, potentially impacting farmers right to farm and the continuance of primary land use functions. The proposed setbacks may also present an expectation that all rural landholders can construct developments within such a distance to a front or side boundary.

Recommendations:

- Councils are best placed to manage development in sensitive rural and environmental locations that have substantial impact on critical resources and this should ideally be done through the development application process.
- Setback controls and other development standards should be set at the local level and reflect the local context, noting that considerations in rural areas differ greatly from those in urban areas.

(c) The benefits and risks of permitting second dwellings on RU1–RU6, C3 and C4 zoned lands, including via complying development

Council Response:

As stated in the general comments above, a detailed analysis of the benefits and risks of permitting additional dwellings in rural and conservation zones and potential approval pathways should be undertaken through a strategic process. It is also important that the local context or nuances are considered.

However, at a high level some of the key risks that require closer consideration include:

- Lack of alignment with existing strategic plans or positions.
- Safety concerns of existing and future residents during natural hazard events (evacuation and sheltering of residents, loss of life, property loss and damage). The outcomes from recent inquiries following natural hazard events are relevant and should be considered (e.g. 2019/2020 Bushfire Inquiry).

- Increased cost to ratepayers through equitable cost sharing for servicing, maintenance and infrastructure provision which costs more than residential than development in urban centres.
- Increased competition for rural land to accommodate residential uses and impacts on producers, the industry and the region.
- Increased land clearing impacts to habitat loss and fragmentation, as well as loss of heritage and biodiversity.
- Development in unsewered areas without Council oversight presents potential risks to Shoalhaven's valuable waterways (including the Sydney Drinking Water Catchment) and coastal environments and is not consistent with desire to protect and restore unique natural environments.
- Impacts on valuable and acknowledged scenic rural landscapes.
- Rural residential development without merit-based assessment including controls on clustering and coverage limitations fundamentally undermines existing land use planning and zone objectives.
- Ability of private certifiers to interpret legislation and characterise development.
- Lack of resources to monitor compliance.

It is not clear that the proposed reforms have considered consistency with the primary objectives of the relevant land use zones as set out in NSW Planning guidance (e.g. Preparing LEPs using the Standard Instrument: standard zones Practice Note, The Environment Protection Zones LEP practice note). Land use zone objectives for each zone will vary somewhat across different councils. Should rural residential uses increase and become the dominant development outcome in rural or conservation zones, the intent of the zones may be fundamentally undermined.

Land clearing is a major cause of habitat loss and fragmentation, as well as heritage and biodiversity decline. Land clearing can also lead to processes that degrade soils, such as erosion, salinisation, loss of organic matter and depleted fertility. A key finding of the 2021 State of the Environment Report identified that a driver of native vegetation clearing in Australia included expansion of land dedicated to infrastructure (including urban development). The proposed reforms will potentially contribute to unplanned encroachment of urban development or uses in rural areas, putting further pressure on the natural environment and heritage.

Nutrient pollution due to human activities including discharges from wastewater systems can have significant impacts on aquatic environments. The design and management of wastewater systems are carefully managed through the development process to ensure that Shoalhaven's valuable waterways and coastal environments are protected. This includes the Sydney Drinking Water Catchment. Further development in unsewered areas without oversight poses a significant risk, and further expansion of

residential development or uses in these areas is inconsistent with what is important to the community as set out in the Shoalhaven 2035 Community Strategic Plan which includes *Protection and restoration of our unique natural environments.*

The various environmental or natural constraints, sensitivities and hazards in rural areas generally necessitate careful assessment through a development application pathway. Additionally, enabling more development through the complying development pathway may increase risks associated with incorrect characterisation of development. For example, Council is aware of instances misclassification of a building use by a private certifier, or approval of a prohibited use, which then becomes an issue where modifications, changes of use or development applications seeking rebuilds after natural disasters occur. The landowner ultimately is the most impacted where issues arise in certification and occupancy or their ability to rebuild after being subject to natural disasters (further commentary on higher exposure to natural disasters is provided under point (f) below).

Council recognises that the proposed reforms represent efforts to increase dwelling supply by providing opportunities for rural landowners to increase development potential of their land, but it is suggested that there are more effective ways which increase return on investment by increasing the supply of homes in more appropriate urban locations that are serviced by planned and existing infrastructure.

Recommendations:

- Careful analysis of risks and benefits should be undertaken and precede any proposed changes or reforms arising from this Inquiry.
- As a general principle, residential development should remain ancillary to the primary function of the land in rural and conservation zones.
- Development in sensitive rural and environmental locations is generally best managed through a development application assessed by Councils. Importantly, Councils remain best placed to provide oversight over the detailed design of associated stormwater and wastewater systems.

(d)	Suitable interaction between the Housing SEPP and/or Codes SEPP and provisions in Local Environmental Plans under section 3.28 of the Environmental Planning and Assessment Act 1979

Council Response:

A general state-wide approach cannot adequately account for the numerous differences between, and within, Local Government Areas. Development in rural and

environmentally sensitive areas necessitates a careful and locally responsive planning approach.

Recommendations:

- Any new planning pathway for additional residential development in rural or environmentally sensitive areas introduced via a SEPP should only be available where the development is already permissible under an LEP.
- Permissibility and development standards should explicitly include and consider relevant provisions in a council's LEP.

(e)	The impact of removing restrictions on dwelling size, attachment, and internal lot distance and implications of enabling second dwellings to be larger than, or function as, the primary dwelling

Council Response:

Planning controls and restrictions guide development towards meeting the relevant objectives of the zone. For example, rural residential development in the applicable zones needs to consider the appropriate site coverage that ensures each zone still achieves its stated primary function. In this instance, site coverage must consider all ancillary innominate development that supports the use of a dwelling house or ancillary development to a dwelling house (i.e. wastewater management areas, garages, sheds, detached habitable studios and rooms, pool houses, workshops etc.).

Clustering of development (e.g. attached dual occupancies) in rural and sensitive locations helps minimise land use impact/conflicts and visual impacts and provides for a compact and efficient use of land and associated infrastructure. This method provides the best opportunity to retain contiguous rural or environmental lands which provide the highest level of efficiency for consistent agricultural production capability, preserves rural scenic qualities and reduces impact on wildlife and biodiversity.

The draft definition suggested for 'second dwelling' encompasses dual occupancy development (either attached or detached). Under the existing definitions for dual occupancies, neither dwelling is considered 'primary' or 'secondary' to one another. However, this would not be consistent with the definition of a secondary dwelling.

Recommendations:

- Removing existing development controls in this regard is not supported without further detailed and careful analysis.
- New rural residential development should generally be clustered in existing cleared areas to ensure that fragmentation of land is minimised and also assist with bushfire hazard protection.

(f)	the role of elevation criteria and 1-in-100-year flood mapping in determining permissibility and the use of performance-based solutions for flood-prone lands (e.g., elevation certification), other land-based hazards and environmental impacts

Council Response:

The 2022 NSW Flood enquiry noted location of future development must be informed by sound road evacuation modelling to ensure adequate capacity to evacuate current and future populations. Consideration of expansion of rural residential uses must consider the cumulative impact of residential densities or isolated additional dwellings on flood and emergency evacuation routes. The ability for this to be undertaken through a "flexible" and "fast tracked" complying development pathway poses risks to all existing and future residents of rural lands. Consultation should occur with the NSW State Emergency Service in this regard.

It is unclear how the elevation criteria and 1% AEP (1-in-100-year) flood mapping would be applied specifically in determining permissibility. It is noted that each catchment responds differently to flooding so a specific criterion may work well for one catchment but could be detrimental or problematic for another catchment.

Most of the Council's flood mapping covers urban areas as it is the human interactions with floods that result in flood risk. Therefore, due to existing lower levels of human occupancy, the required detailed flood mapping may not exist for many rural areas to identify whether a property is a flood control lot on the section 10.7 planning certificate. As such, the proposal has the potential to inadvertently introduce additional risk in areas with currently unmapped flood risk, which ultimately could substantially increase the number of people and properties at risk.

It is noted that section 3A.38 of the Codes SEPP currently identifies where complying development can occur. However, it does not specify which flood event it is referring to when identifying areas of high hazard, flood storage, floodway etc. It is unclear how risks above these events have been considered. It should be noted that Councils DCP has more specific guidelines and parameters in this regard.

Most of the land in the applicable zones in Shoalhaven is identified as bushfire prone land. Increasing rural residential use and densities, as noted in *Planning for Bushfire Protection 2019*, can impact on the evacuation and sheltering of residents during a bush fire event. The proposed setbacks do not provide sufficient land to enable asset protection zones to be maintained wholly within the land associated with the dwelling. Concerns also exist that the opportunity for dispersed rural residential development (including associated asset protection zones) could lead to adverse biodiversity decline outcomes or isolated development that is difficult to protect or is at risk.

Recommendations:

- Further intensification of rural residential uses or development should not occur in uncategorized flood risk areas or areas mapped as bushfire prone land except through a development application process
- Further clarification is required on elevation criteria to inform application of any future policy.
- Any proposed development standards for flooding should also require consistency with Council's DCP.
- Hazards, and resulting risk, must be considered in accordance with the *NSW Flood Risk Management Manual (2023)*.
- Any proposed reforms resulting from the Inquiry should be considered in detail by the NSW State Emergency Service and NSW Rural Fire Service.

(g)	The interaction between second dwellings and potential impacts on rural activities and productive capacity of land for agriculture, including feasibility and implications of allowing second dwellings without subdivision.

Council Response:

There are concerns about the potential for increased rural residential use or development to impact on existing high quality agricultural land. High capability agricultural land is an invaluable natural resource that provides the capacity to meet the increasing demands of our community for food and other products. In Shoalhaven, *prime crop and pasture land* (PCPL) is land identified as being capable of sustaining high levels of agricultural productivity and having the best quality soil and water resources, favourable topography and other factors. Fragmentation of PCPL will affect future agricultural production capacity and will have social and economic impacts on NSW's food security and economic prosperity.

Development has a larger footprint than its building area, and the impacts of residential development on agricultural uses can often extend well beyond building curtilages and property boundaries, especially where setback provisions to incompatible uses are based on urban residential development thinking. A key conclusion of the Managing farm related land use conflicts in NSW research report prepared by the Australian Farm Institute was the need for acceptance and defence of state-wide acceptable agricultural practices by government, agencies and industry, reinforced by clear planning guidelines.

There are mechanisms in place protect viable areas of PCPL from further fragmentation through controls on subdivision and residential development that is currently permissible in the applicable zones and these need to be recognised and respected.

The NSW Department of Primary Industries has yet to finalise the State Significant Agricultural Land (SSAL) mapping which will identify the highest-grade agricultural land in NSW. The introduction of increased rural residential uses or development prior to the final mapping could undermine this important body of work already substantially progressed. It is important that this mapping is finalised to inform any future reforms in this regard.

Recommendations:

- Do not introduce any increases in rural residential use or development until the State Significant Agricultural Land Mapping (SSAL) is finalised.
- Establish a clear policy position regarding increased rural residential densities (including ancillary development supporting residential uses such as wastewater management areas, etc.) in areas identified as SSAL or PCPL (as defined).
- If needed or appropriate, make representations to help expedite finalisation of the SSAL mapping.
- Take a strategic approach to resource and land use planning that prioritises agricultural production in the relevant zones where agriculture is permissible to required the preservation of productive land for future generations.

(h)	The use of non-discretionary, zone-specific development standards and their interaction with merit-based assessment in complying pathways and legal frameworks for tenancy in common, co-ownership, and strata-like arrangements on rural land

Council Response:

It is unclear how non-discretionary and merit-based assessments interact if the intention of the reforms is to enable *flexible, streamlined, and liberalised approval* mechanisms by certifiers specialising in building compliance, for uses not permitted in LEP's. It is unclear who in this instance will undertake the merit-based assessment, but the limited resources of many councils should be noted/considered.

Increasing rural residential uses or development under individual land ownership appears to be an intended outcome of the proposed reforms. Strata subdivision to create lots under the minimum lot size is not permissible in accordance with Shoalhaven LEP 2014.

It is beyond the remit of planning legislation to investigate legal frameworks, land ownership and tenancy agreements. It is likely that allowing additional rural residential uses or development will inevitably lead to further expectation or pressure for subdivision and this is likely to be concern that will require closer consideration to avoid unintended or undesirable outcomes.

Recommendation:

- Liberalising the ability to subdivide land in sensitive rural and environmental areas is generally not supported given precedent concerns and the potential for associated unintended or undesirable outcomes or consequences.

(i) Mechanisms to streamline the development application and Complying Development Certificate (CDC) processes

Council Response:

As noted in (b) streamlined processes should only be available to development where impacts are known, low risk and straightforward. These reforms seek to enable increased development on some of the most constrained and resource-sensitive lands in the state.

Recommendations:

- Councils remain the most appropriate authority to manage applications in sensitive rural and environmental locations that could have substantial impact on critical natural resources.

- The mechanism to streamline applications through a CDC pathway which may reduce the robust assessment criteria required to ensure minimal risk to valuable resource lands is generally not supported.

(j) The adequacy of existing infrastructure (e.g. sewage, access roads) for servicing second dwellings and potential impacts of reforms on housing affordability, multigenerational living, and rural population growth

Council Responses:

Regional and rural councils face ongoing fiscal challenges related to infrastructure and service provision. These challenges are considered and reflected in local planning outcomes where needed.

Any suggestion that additional housing on rural land comes at no cost to taxpayers is queried/questioned. In practice, urban property owners in rural Council areas subsidise rural residential development through disproportionate cost sharing for Council services.

Rural waste collection incurs substantially higher costs due to longer distances, increased vehicle wear, and logistical challenges. Transfer stations and remote roadside bin placements add further expense and community inconvenience, with increased risks of illegal dumping and environmental harm in un-serviced areas.

Increased rural residential use or density frequently results in community pressure on Councils to upgrade and maintain unsealed roads, further impacting Council's limited resources. These cost burdens are distributed across all ratepayers, increasing household costs and disadvantaging a large proportion of the community for the use and economic benefit of a few. Comparatively, urban densification does not produce the same financial strain and most effectively utilises Council resources. This cumulative impact of subsidising rural residential development threatens the financial stability of rural Councils and their ability to deliver essential services equitably.

It is also unlikely or questionable whether additional housing in rural or environmentally sensitive areas will be that affordable given the costs associated and the premium of some locations.

Recommendations:

- Undertake a thorough analysis of the actual costs to the community, including ratepayers, that may result from any proposed reforms.

(k) Transitional arrangements and monitoring of policy outcomes

Council Response:

Councils have limited resources to undertake monitoring of the policy outcomes should they eventuate. Enforcement responsibilities in rural and remote areas would be particularly stretched especially if a new complying development pathway is introduced. As an example, when compliance inspections relate to non - urban properties, two staff members would generally attend (for safety reasons) in comparison to one staff member in urban areas.

Recommendations:

- If a policy is introduced at the state government level then monitoring responsibilities should also potentially rest with NSW Government Agencies.
- Consider ways to assist rural and regional councils with any additional compliance and enforcement burdens that may emerge from any associated reforms.

(l) any other related matters.

Council Response:

Council would appreciate the opportunity to further engage on this matter as it progresses. If the inquiry recommends reforms to the planning system, further meaningful consultation with Councils will be necessary, particularly to help identify unintended consequences of detailed proposals and ensure that they are resolve before anything become operational.