

# NSW Coastal Design Guidelines 2023



## Worked example of using the planning proposal checklist to assess against the guidelines

This document provides an example of the level of detail needed to complete the planning proposal checklist. The checklist helps to demonstrate how a planning proposal in the coastal zone is consistent with and gives effect to the requirements of section 3.2 of the NSW Coastal Design Guidelines 2023.

### How to use the checklist

The checklist contains 4 columns. The proponent should fill the final two columns.

#### Column 1: Requirement

This column replicates the requirements in section 3.2 of the guidelines. Do not modify or remove any text from this column.

#### Column 2: Relevant coastal management area(s)

This column lists the coastal management areas where the requirement must be applied. Do not modify or remove any text from this column.

#### Column 3: Applicable to planning proposal (Y/N)

The answer in this column confirms if any part of the planning proposal site is located in any one of the coastal management areas listed in column 2.

#### Column 4: Planning proposal is consistent with the guidelines (Y/N)

If column 3 is "Yes":

- and the requirement is relevant to the proposal, and the requirement has been addressed, state "Yes" and provide a brief explanation.
- and the requirement is relevant to the proposal, but the requirement has not addressed, state "No" and provide justification for the inconsistency.
- and the requirement is not relevant to the proposal, state "N/A" and provide a brief explanation.

### Managing inconsistency between requirements

If there is an inconsistency between requirements, the hierarchy of coastal management areas applies and the requirement relevant to the higher coastal management area prevails to the extent of any inconsistency.

Hierarchy of coastal management areas:

1. CWLRA = coastal wetlands and littoral rainforests area
2. CVA = coastal vulnerability area
3. CEA = coastal environment area
4. CUA = coastal use area



## Worked example of a completed checklist

The example is based on a planning proposal for a large infill development site in the town centre of an existing coastal town, which has been de-identified for the purposes of copyright and confidentiality.

The planning proposal sought to amend the existing local environmental plan to increase the height of building and floor space ratio (FSR) controls, and facilitate additional land uses within a mixed-use development zone. The proposal was supported by an adopted residential development strategy and an adopted local strategy for the town.

The site has been previously developed, has no significant native vegetation and is highly disturbed.

The site is surrounded by a diverse range of public open space, commercial, retail, medium and high density residential development. The nearest foreshore area is approximately 100m from the site and has been developed historically for a range of waterfront tourist and commercial activities, with public recreation areas and facilities.

### Coastal management areas and hierarchy

The planning proposal site for this worked example:

- is not in the Coastal Wetlands and Littoral Rainforests Area (CWLRA)
- is not in the Coastal Vulnerability Area (CVA)
- is fully within the Coastal Environment Area (CEA)
- is partially within the Coastal Use Area (CUA).

### Addressing the checklist in this location

Column 3: Applicable to planning proposal (Y/N):

- “Yes” for any requirement that lists CEA and/or CUA in column 2; and
- “No” for any requirement that only lists CWLRA or CVA in column 2.

Column 4: Planning proposal is consistent with the guidelines (Y/N):

- Where column 3 is “Yes”, Column 4 states “Yes” with a brief explanation or “No” with justification for the inconsistency.
- Where column 3 is “No”, Column 4 states “N/A” and provides a brief explanation.

# Appendix 1: Assessment checklist for planning proposals

Hierarchy of coastal management areas:

1. CWLRA = coastal wetlands and littoral rainforests area
2. CVA = coastal vulnerability area
3. CEA = coastal environment area
4. CUA = coastal use area

Outcome A. Protect and enhance coastal environmental values			
Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>Outcome A.1 Protect coastal ecosystems</b>			
<b>A.1a</b> Avoid development on undeveloped headlands and significant coastal landforms.	CVA, CEA	Yes	<i>N/A. Not located on a headland or coastal landform.</i>
<b>A.1b</b> Do not increase development or intensify land uses where there is existing development on headlands and significant coastal landforms.	CVA, CEA	Yes	<i>N/A. Not located on a headland or coastal landform.</i>
<b>A.1c</b> Identify, protect and enhance sensitive coastal ecosystems including coastal wetlands, littoral rainforests and other coastal threatened ecological communities that may be affected by development.	CWLRA, CEA	Yes	<i>N/A. Site does not contain, and is not located in close proximity to, coastal wetlands or littoral rainforests or any other threatened ecological communities that are likely to be affected by the proposal.</i>
<b>A.1d</b> Maintain and protect the presence of beaches, rock platforms, coastal dunes, riparian vegetation and the natural features of foreshores, including along estuaries and coastal lakes.	CWLRA, CVA, CEA	Yes	<i>N/A. The site is located more than 100m from the nearest foreshore feature (a lake) and is separated by existing urban built form. Therefore, it will not have any direct impact on natural coastal features.</i>
<b>A.1e</b> Use environmental buffers and limit the number of access points and pathways to protect coastal ecosystems. In some cases, it may not be appropriate to allow public access to areas with highly sensitive ecosystems or animal populations.	CWLRA, CEA, CUA	Yes	<i>N/A. There are no identified sensitive ecosystems or animal populations in this location.</i>
<b>A.1f</b> Consider if the planning proposal is needed or if development zones could be better located to minimise effects on biodiversity.	CWLRA, CEA, CUA	Yes	<i>YES. The site is highly disturbed, has been previously cleared for urban purposes and does not contain natural environmental features. Therefore, there are no anticipated adverse effects on biodiversity.</i>
<b>A.1g</b> Avoid development that may disturb, expose or drain areas of Class 1 and Class 2 acid sulfate soils.	CWLRA, CEA, CUA	Yes	<i>N/A. The land is mapped as Class 3 and Class 4 on the Acid Sulfate Soils Planning Maps.</i>

## Outcome A. Protect and enhance coastal environmental values

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>A.1h</b> Consider direct and indirect effects of development, including any necessary infrastructure, on water quality, water quantity and hydrological flows of waterways and groundwater.	CEA, CUA	Yes	<i>YES. There is suitable capacity in water and sewer systems to cater for development of the site. Specific management measures can be included in the development application stage to avoid or mitigate any adverse impacts.</i>

### Outcome A.2 Protect coastal wetlands and littoral rainforests

<b>A.2a</b> Identify coastal wetlands and littoral rainforests, including areas that could be rehabilitated or restored in the future, and do not increase development or intensify land uses in these areas.	CWLRA	No	<i>N/A. Proposal is not in CWLRA.</i>
<b>A.2b</b> Allow for the adaptive management of stormwater run-off so that the quality of water leaving the site is better than pre-development quality to lessen effects on coastal wetlands or other sensitive receiving environments.	CWLRA, CEA, CUA	Yes	<i>YES. The proposal will not impact on the ability of the site to accommodate appropriate stormwater management measures (at the development application stage).</i>
<b>A.2c</b> Provide environmental buffers and riparian corridors that enable the long-term management and protection of areas of biodiversity and ecosystem integrity.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is highly disturbed and does not contain natural environmental features. Therefore, there are no anticipated impacts on biodiversity or identified need to provide environmental buffers.</i>
<b>A.2d</b> Identify and protect areas that allow for landward migration pathways for coastal wetlands to respond to climate change.	CWLRA, CEA	Yes	<i>N/A. No coastal wetlands on the site or in close proximity.</i>
<b>A.2e</b> Exclude land uses that affect the natural state of coastal wetlands and littoral rainforests or that will make it harder to rehabilitate these ecosystems in the future.	CWLRA	No	<i>N/A. Proposal is not in CWLRA.</i>

### Outcome A.3 Protect marine parks and aquatic reserves

<b>A.3a</b> Avoid development and land uses that affect the environmental, economic, social and cultural values of marine parks and aquatic reserves.	CEA, CUA	Yes	<i>N/A. No marine parks or aquatic reserves in proximity to the site.</i>
<b>A.3b</b> Protect the ecological health of marine parks and aquatic reserves, including providing for riparian vegetation and buffers in their catchments.	CEA, CUA	Yes	<i>N/A. No marine parks or aquatic reserves in proximity to the site.</i>

## Outcome B. Ensure the built environment is appropriate for the coast and local context

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>Outcome B.1 Respond to and protect elements that make the place special</b>			
<b>B.1a</b> Integrate development within the natural topography of the site and ensure land use, building scale and height respond sympathetically to coastal landforms.	CWLRA, CVA, CEA, CUA	Yes	<i>NO. The coastal landforms are generally low lying and flat in proximity to the site. Existing surrounding built form is generally one to two storeys, however this is significantly less than the future desired character reflected in LEP controls. The proposed building heights and floor space ratios will integrate with the future planned urban form for the area, with an increase on the site to provide a landmark status suitable to the area.</i>
<b>B.1b</b> Ensure the intended form and footprint of development does not dominate coastal elements, including foreshores, public spaces and other areas of natural beauty.	CWLRA, CVA, CEA, CUA	Yes	<i>YES. The proposed building heights and floor space controls are generally similar to controls for adjoining land and will integrate with the future planned urban form for the area. Therefore, in the context of surrounding built form, the proposal would not dominate coastal elements.</i>
<b>B.1c</b> Incorporate adaptive, water-sensitive urban design into the development footprint to reduce run-off and manage water quality within receiving environments.	CWLRA, CEA, CUA	Yes	<i>YES. The proposal will not impact on the ability to include WSUD measures (at the development application stage).</i>
<b>B.1d</b> Ensure that lot sizes, building heights and density are appropriate for the coastal settlement, and complement the existing or desired local character, supported by place-based strategies.	CEA, CUA	Yes	<i>YES. The proposed building heights and density controls are generally similar to those for adjoining land and will be consistent with the desired future character for the area. The proposal allows for increased density within the town centre which provides for a compact settlement.</i>
<b>B.1e</b> Avoid development that would harm geological features and geoheritage.	CEA, CUA	Yes	<i>N/A. Site does not contain, or located in close proximity to, any significant geological features or geoheritage.</i>



## Outcome B. Ensure the built environment is appropriate for the coast and local context

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>Outcome B.2 Ensure urban development complements coastal scenic values</b>			
<b>B.2a</b> Limit ribbon development and urban sprawl wherever possible. In certain locations, place-based strategies may support increased development density and building heights as a better response to urban growth.	CEA, CUA	Yes	YES. The proposal provides for increased density within an identified strategic centre.
<b>B.2b</b> Use greenbelts to create, maintain and mark out separation between settlements.	CEA, CUA	Yes	N/A. The site would accommodate an infill development, within an existing town centre.
<b>B.2c</b> Consider effects on scenic values and maintain publicly accessible views to significant landmarks.	CEA, CUA	Yes	YES. Views towards a nearby lake have been assessed and will not be impacted. Views are not available from the adjoining sites due to topography, existing buildings and vegetation.
<b>B.2d</b> Ensure that building heights consider the effect on views from different vantage points.	CEA, CUA	Yes	YES. A view analysis of the proposal from the surrounding demonstrates that there will be no unacceptable impacts on views.
<b>B.2e</b> Retain or create views from public spaces. Prioritise this over creating views from private property.	CEA, CUA	Yes	YES. The proposal does not include any change to land uses, and will not impact on views to or from public spaces, nor prioritise views for private property.
<b>B.2f</b> Provide for active transport links along foreshores, including along estuaries and coastal lakes, and between settlements to increase public access and amenity.	CWLRA, CVA, CEA, CUA	Yes	YES. Significant improvements to the pedestrian and cycle infrastructure in this location can be provided and connected to existing networks along estuary foreshores.

## Outcome C. Protect and enhance the social and cultural values of the coastal zone

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>Outcome C.1 Protect and promote heritage values</b>			
<b>C.1a</b> Ensure development does not harm heritage values or sites.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. There are no heritage items on the site. The nearest heritage item is approximately 100m from the site and is separated from the site by existing built form.</i>
<b>C.1b</b> Work collaboratively with local Aboriginal people before and throughout the planning proposal process.	CWLRA, CVA, CEA, CUA	Yes	<i>YES. The Local Aboriginal Land Council have been engaged, and have visited the site. No particular constraints or opportunities have been identified for development of the site.</i>
<b>C.1c</b> With permission and guidance from local Traditional Custodians, identify and emphasise significant features of coastal land and sea Country.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. Assessment of the site by the Local Aboriginal Land Council did not reveal any significant features of coastal land and sea Country.</i>
<b>C.1d</b> With permission and guidance from local Traditional Custodians, identify and protect sacred and significant areas through the appropriate siting of development.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. Assessment of the site by the Local Aboriginal Land Council did not reveal any sacred or significant areas on the development site.</i>
<b>C.1e</b> Ensure land use, building type, scale and height respond to heritage items and areas.	CEA, CUA	Yes	<i>N/A. The nearest heritage item is approximately 100m from the site and is separated from the site by existing built form.</i>
<b>Outcome C.2 Provide public access to significant coastal assets</b>			
<b>C.2a</b> Protect and, where practical, improve, public amenity, access to and use of beaches, foreshores, rock platforms, geoh heritage sites and headlands, unless you must restrict access for public safety or for environmental or cultural protection. In doing so, consider both current and projected future coastal hazards.	CVA, CEA	Yes	<i>YES. Significant improvements to the pedestrian and cycle infrastructure in this location can be provided and connected to beaches and foreshores.</i>
<b>C.2b</b> Identify opportunities to maintain and improve existing public access to beaches, foreshores, coastal waters and coastal lakes that support active and passive recreation activities, where this does not interfere with existing coastal industries.	CWLRA, CVA, CEA, CUA	Yes	<i>YES. Significant improvements to the pedestrian and cycle infrastructure in this location can be provided and connected to beaches, foreshores, coastal waters, and coastal lakes.</i>

## Outcome C. Protect and enhance the social and cultural values of the coastal zone

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>C.2c</b> Consolidate access points and consider alternative access to protect sacred and significant Aboriginal cultural areas.	CWLRA, CVA, CEA, CUA	Yes	N/A. There are no identified sacred and significant Aboriginal cultural areas on or adjoining the site.
<b>C.2d</b> Maintain and improve foreshore access and connections to existing or proposed networks of public open spaces. This includes waterways, riparian areas, bushland and parks for active and passive recreation.	CWLRA, CVA, CEA, CUA	Yes	YES. The development site can provide for links to the foreshore open space and the CBD, providing strong pedestrian and bicycle connectivity.
<b>C.2e</b> Consider opportunities to protect and improve habitat connectivity through settlements, such as those described in the <i>Greener Places Design Guide</i> .	CWLRA, CEA, CUA	Yes	YES. While the proposal is not located in a significant habitat corridor, there are some existing trees that may contribute to local habitat. The development concept provides for the retention of these trees and additional street tree planting.
<b>C.2f</b> Avoid development on coastal dunes and foreshore reserves unless it is for essential public purposes, such as surf life-saving club buildings. Any building or structure located on dunes must be of lightweight construction and relocatable.	CVA, CEA	Yes	N/A. There are no coastal dunes or foreshore reserves on the site
<b>C.2g</b> Define the boundaries of development sites with a public edge – for example, a pedestrian pathway or public laneway.	CEA, CUA	Yes	YES. A shared path is planned to be provided on one edge of the site.
<b>C.2h</b> Prevent the privatisation of coastal open space by ensuring development next to foreshores is set back, maintains public access and accessibility, and provides links and connections to other public accessways.	CEA, CUA	Yes	N/A. The site is not directly adjacent to coastal open space or the foreshore.



## Outcome D. Support sustainable coastal economies

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>Outcome C.3 Protect public amenity</b>			
<b>C.3a</b> Avoid development that will overshadow the beach, foreshore or public domain. Apply the standard that there must be no overshadowing before 4 pm (midwinter) and 7 pm (Eastern Daylight Saving Time).	CEA, CUA	Yes	YES. The proposal will not result in overshadowing of the foreshore or any public recreational areas.
<b>C.3b</b> Protect the amenity of public spaces from buildings, structures or land uses that may be visually and/or acoustically intrusive or create wind funnels.	CEA, CUA	Yes	YES. Detailed design at development application stage would be required to assess visual, acoustic and wind impacts. However, the site is not located in proximity to public spaces that are likely to be adversely impacted.
<b>Outcome D.1 Support sustainable industries and recreational activities that depend on the coast</b>			
<b>D.1a</b> Ensure that development will not harm sustainable coastal industries needing waterfront access, or recreational use of the coastal environment.	CEA, CUA	Yes	N/A. The proposed development will not impact coastal industries or recreational uses as it is not directly adjacent to the waterfront.
<b>D.1b</b> Protect and improve essential facilities such as access ramps and jetties for sustainable coastal industries needing waterfront access.	CEA, CUA	Yes	N/A. The proposal will not impact upon any waterfront facilities such as access ramps and jetties.
<b>D.1c</b> Ensure access ramps, jetties, pontoons, groynes and other structures do not impede navigation on the water or harm coastal landforms or impair processes such as surf breaks.	CWLRA, CVA, CEA, CUA	Yes	N/A. The proposal does not include any development in waterways.
<b>D.1d</b> Ensure that the proposal considers how development in a waterway may affect the land.	CEA, CUA	No	N/A. The proposal does not include any development in waterways.
<b>Outcome D.2 Promote green infrastructure</b>			
<b>D.2a</b> Do not allow development that is likely to significantly reduce connectivity of existing green infrastructure.	CEA, CUA	No	N/A. The proposal will not impact on or reduce connectivity to nearby green infrastructure.
<b>D.2b</b> Provide for diverse green infrastructure that can support the changing needs of current and future communities, and provide tourism and recreational opportunities.	CEA, CUA	No	YES. The proposal will not limit the opportunities for green infrastructure to be provided (in the detailed design and development application stage).

## Outcome E. Respond to coastal hazards

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>Outcome E.1 Respond to coastal processes</b>			
<b>E.1a</b> Planning proposals that affect land within a coastal hazard and risk area must not alter coastal processes in a way that harms the natural environment or other land.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to any coastal hazard, risk, or erosion.</i>
<b>E.1b</b> Exclude development in areas affected by a current or projected future coastal hazard that is likely to increase the risk of coastal hazards on that land or other land.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to any coastal hazard, risk, or erosion.</i>
<b>E.1c</b> Locate or consolidate development in areas with little or no exposure to current and projected future coastal hazards, to ensure public safety and prevent risks to life.	CWLRA, CVA, CEA, CUA	Yes	<i>YES. The site is not identified as being subject to any coastal hazard, risk, or erosion.</i>
<b>E.1d</b> Do not increase development potential or intensify land uses in a coastal hazard or risk area.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to any coastal hazard, risk, or erosion.</i>
<b>Outcome E.2 Account for natural hazard risks</b>			
<b>E.2a</b> Identify areas on and near the proposal that are affected by current or projected future coastal hazards. Ensure that the proposal is compatible with any identified threat or risk.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. There are no current or projected future coastal hazard areas in the vicinity of the site.</i>
<b>E.2b</b> Account for potential interaction between coastal hazards and other current and future natural hazards. This includes flooding, bushfires, landslip, heatwaves, severe storms, east coast lows and cyclones. Refer to the <i>Strategic Guide to Planning for Natural Hazards</i> .	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. There are no current or projected future coastal hazard areas in the vicinity of the site.</i>
<b>E.2c</b> Manage natural hazard risk within the development site. Avoid using public space or adjoining land to lessen risk.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. There are no current or projected future coastal hazard areas in the vicinity of the site.</i>
<b>Outcome E.3 Account for climate change</b>			
<b>E.3a</b> Demonstrate that the proposal applies a 100-year planning horizon for the full range of climate change projections for coastal hazards. This approach recognises that sea level is projected to continue to rise for centuries because of climate change.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to current or projected future coastal hazards.</i>
<b>E.3b</b> Consider how climate change could affect the risk profile of existing natural hazards and create new vulnerabilities and exposure for the proposal in the future.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to current or projected future coastal hazards.</i>

## Outcome E. Respond to coastal hazards

Requirement	Relevant coastal management area(s)	Applicable to planning proposal (Y/N)	Planning proposal is consistent with guidelines (Y/N) If 'No', justify this
<b>Outcome E.4 Provide sustainable defences to coastal hazards</b>			
<b>E.4a</b> Reduce exposure to coastal hazards by protecting, restoring or improving natural defences. This includes coastal dunes, vegetation, coastal floodplains and coastal wetlands, where suitable.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. There are no natural defences or identified coastal hazards affecting the development site.</i>
<b>E.4b</b> If natural defences are not possible, reduce exposure to coastal hazards without significantly degrading: <ul style="list-style-type: none"> <li>• <b>biological diversity and ecosystem integrity</b></li> <li>• <b>ecological, biophysical, geological and geomorphological coastal processes</b></li> <li>• <b>beach and foreshore amenity, or the social and cultural value of these areas</b></li> <li>• <b>public safety and access to, or use of, beaches or headlands.</b></li> </ul>	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. There are no natural defences or identified coastal hazards affecting the development site.</i>
<b>Outcome E.5 Protect essential infrastructure</b>			
<b>E.5a</b> Locate and design essential infrastructure to reduce vulnerability to current and projected future coastal hazards. Consider the effects of climate change over at least a 100-year planning horizon.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site has access to existing essential infrastructure. The site is not identified as being subject to current or projected future coastal hazards.</i>
<b>E.5b</b> Where exposure to coastal hazards cannot be avoided, prepare adaptation plans for essential service infrastructure. These plans should be consistent with any applicable coastal management program.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to current or projected future coastal hazards.</i>
<b>E.5c</b> Consult local Aboriginal land management experts and emergency management agencies on how to strategically locate access routes and other essential infrastructure.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to current or projected future coastal hazards.</i>
<b>Outcome E.6 Change land uses to manage legacy issues and avoid creating new ones</b>			
<b>E.6a</b> Ensure the proposal will not require coastal management interventions to remain viable over its expected lifespan.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The site is not identified as being subject to current or projected future coastal hazards</i>
<b>E.6b</b> Consider the potential legacy effects of the proposal and if the proposed land uses or development will create a social, environmental, economic or cultural burden for future generations.	CWLRA, CVA, CEA, CUA	Yes	<i>YES. The proposal does not include any change to land use, and will not create a social, environmental, economic, or cultural burden for future generations.</i>
<b>E.6c</b> Consider if the proposed change of land use could remove redundant legacy infrastructure or reduce existing legacy effects.	CWLRA, CVA, CEA, CUA	Yes	<i>N/A. The proposal does not include any change to land use.</i>