

29 October 2021

General Manager
Bega Valley Shire Council
Delivery by email

Attention: Strategic Planning Coordinator, Sophie Thomson

Dear Sophie,

**Subject: Formal request for extension of time for Gateway
(PP_BEAAV_002_00), South Pambula**

Garret Barry Planning Services (GBPS) is consultant planner to Mr Graeme Payten. Mr Payten's property is defined as "site 2" in the Gateway letter from the Department of Planning Industry and Environment (DPIE) of 29 May 2020 (copy attached). It's title detail is lot 711 DP 1128593.

In discussion with Council it has been resolved that Mr Payten attempt a draft planning proposal separate to "Site 1" and that Council will separately deal with the proposed zoning of this deferred site 1.

The Gateway sets a time frame of 29 November 2021 for completion of the planning proposal. Clearly that time is not now achievable and this submission argues the case for an extension of 6 months to be granted by DPIE. Many of the reasons for the delay have been beyond Mr Payten's control and he has now invested or committed to very significant expenditure to progress the proposal, in attempting to satisfy the gateway requirements and very detailed requirements being sought from other State agencies and from Council.

Reasons in support of the 6 month extension:

1. General approach

In discussion with Council it was agreed we seek to split Sites 1 and 2 into separate proposals with Council to address Site 1. We also propose a combined DA and planning proposal as the best method to comprehensively address all planning issues for what is now a stand-alone site, with some environmental sensitivities.

The more detailed requirements for DA level assessment have added to delay.

2. Access delays.

The initial planning proposal had not resolved a satisfactory access to the highway. It took until March 2021 to even identify a possible solution. That solution involves a complex new highway intersection. It is vital for a robust planning proposal that we achieve in principle agreement from Traffic for NSW to such intersection. We have had an engineering team engaged on the design since March involving at least 5 rounds to date of detailed work right down to almost construction level drawings and

Personalised service from a senior planning and development professional

design in attempting to secure TfNSW agreement. Such agreement is now close and has the potential to deliver a considerable public benefit in that a quite dangerous existing intersection (Summer Hill road/ Princes highway) would be able to be closed.

A copy of the current state of the highway intersection design is available in the data link.

3. Natural resources

It took until March 2021 to secure any detailed advice/ requirements from the DPIE Biodiversity and Conservation Division. Their detailed letter of requirements is included in the attachment package.

The natural resource requirements sought by Biodiversity and Conservation and in the Gateway letter are significant and extensive. We support a robust natural resource assessment as the site is in the lower catchment of Pambula Lake and adjoins some areas containing important biodiversity. However almost all consultants are booked out for months and while we now have a full team on board, the current regional boom has generated delays and several reports are some weeks off completion.

To achieve this rigour will involve or has involved:

- Full Biodiversity Development Assessment Report. We have this advanced and preliminary BOS work has influenced the design as presented in the link package. But completion of the full BDAR requires late spring work given species identified that are only able to be surveyed October / November.
 - High standard on site sewerage assessment. We have engaged State recognised experts Martens who are progressing a thorough site evaluation and detailed effluent management plan. Unfortunately they are unlikely to achieve a final before the deadline.
 - Full flood and waterway analysis has been completed and included in the link.
 - Preliminary bushfire input to the design has been achieved but a final formal bushfire report to RFS standards will need to be prepared once the overall concept is finalised.
 - A full Aboriginal Cultural heritage assessment has been effected and consulted with Eden Local Aboriginal Land Council who have agreed with the findings to the effect there are no identified heritage constraints. (Copy of report in the link package).
 - A full assessment of the site in accordance with the contaminated lands guidelines has not identified any constraints and we should have the formal report within 1 week.
 - Engineering design is advancing including focus on high standard soil and water management techniques.
4. We now have preliminary input from all the above consultants giving a high level of confidence the attached draft subdivision plan will meet all reasonable requirements and supports the lot size and zoning proposals of the accompanying draft planning proposal. This proposal is a work in progress for your comments/ advice. GBPS have

work advanced also on the DA Statement of Environmental Effects and a socio-economic assessment.

5. GBPS only took over coordination of the project in May 2021 and have considerably accelerated action since that time to a stage where now we anticipate a full draft DA and planning proposal package is possible to lodge with Council in December.

We seek Council's support for the 6 month extension to end May 2022 and request Council put that request to the Department. We are confident we can achieve submission of a full and satisfactory planning proposal and DA in December and that means good prospects of a superior planning outcome and still time to complete the proposal by June 2022. It would be a considerable hardship for Mr Payten if the Gateway was to lapse next month after such an investment and action to try to meet the Department, other State agencies and Council's requirements. We feel the extra time will deliver a sound planning outcome.

I would be happy to participate in a zoom or similar meeting should Council or the Department desire.

While we have attached much draft information, and comment on same is invited from Council and the Department, the primary purpose is to demonstrate the extent of investment in the planning proposal to date by our client and attempt to secure an additional 6 months for completion. Final versions of all necessary reports and final Planning Proposal can be provided in December.

Yours sincerely,

Garret Barry

Director

Garret Barry Planning Services

ABN 28 123 132 829

T: 02 6494 4145

M: 0408 905 903

E: garret@gbps.com.au

W: www.gbps.com.au

Summary of attachments:

1. Following are copies of the Gateway and BCD letters.
2. The accompanying link is to a data package including:
 - a. Draft planning proposal (work in progress for comment)
 - b. Draft concept design for a 15 lot subdivision.
 - c. Current draft highway intersection currently under review by TfNSW
 - d. Preliminary BOS site mapping
 - e. Flood risk and surface flow assessment.
 - f. Heritage assessment

Gateway Determination

Planning proposal (Department Ref: PP_2020_BEGAV_002_00): to rezone two sites located south of South Pambula and west of the Princes Highway to E4 Environmental Living Zone and E2 Environmental Conservation Zone.

I, the Director Southern Region at the Department of Planning, Industry and Environment, as delegate of the Minister for Planning and Public Spaces, have determined under section 3.34(2) of the *Environmental Planning and Assessment Act 1979* (the Act) that an amendment to the Bega Valley Local Environmental Plan (LEP) 2013 to rezone two sites located south of South Pambula and west of the Princes Highway to E4 Environmental Living Zone and E2 Environmental Conservation Zone should proceed subject to the following conditions:

1. The planning proposal must be revised prior to community consultation to:
 - a. Include a concept development plan for site 1.
 - b. Clarify if sites 1 and 2 will be serviced by reticulated water supply and sewerage.
 - c. Provide a response to Directions 14,15,16 and 28 of the South East Tablelands Regional Plan.
 - d. Delete any reference to State Environmental Planning Policy 62 Sustainable Aquaculture and SEPP (Rural Lands) 2008 and provide an updated response to SEPP (Primary Production and Rural Development) 2019 and Direction 1.5 Rural Lands.
 - e. Remove any reference to State Environmental Planning Proposal 55 Remediation of Land and provide a response to Section 9.1 Direction 2.6 Remediation of Land.
 - f. Provide an updated response to Question 9 under Section C on social and economic impacts, including deleting a reference to the proposed rezoning of the two sites to R2 Low Density development.
 - g. Update the timeframe for completing the plan.
2. The planning proposal is to be amended in consultation with relevant state agencies to include the following additional studies and assessments:
 - a. Flora and fauna impact assessment including an assessment of potential impacts on threatened species, populations and communities under the *Biodiversity and Conservation Act 2016* in consultation with DPIE Biodiversity and Conservation.
 - b. Bushfire Assessment that meets the requirements of section 4.4 of the *Planning for Bushfire Protection 2019* in consultation with the NSW Rural Fire Service.

- c. Stage 1 Preliminary investigation into potential land contamination in accordance with the *Managing Land Contamination: Planning Guidelines* (1998).
 - d. Traffic analysis to identify the preferred vehicular road access/egress with the Princes Highway in consultation with Transport for NSW.
3. Consultation is required with the following public authorities/organisations under section 3.34(2)(d) of the Act prior to community consultation:
 - Transport for NSW
 - DPIE Biodiversity and Conservation
 - DPI Fisheries
 - DPI Agriculture
 - Natural Resources Access Regulator
 - NSW Rural Fire Service (s9.1 Direction 4.4 Planning for Bushfire Protection)
 - DPIE Resources and Geoscience
 - NSW Environmental Protection Authority
 - The relevant Local Aboriginal Land Council

Each public authority/organisation 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.

4. Council must not undertake community consultation until it has;
 - a. provided a revised planning proposal addressing matters identified in conditions 1 and 2 and copies of submissions from agencies to the Director, Southern Region, and
 - b. obtained the approval of the Director, Southern Region on Council's response to matters raised by state agencies.
5. Public exhibition is required under section 3.34(2)(c) and schedule 1 clause 4 of the Act as follows:
 - (a) the planning proposal must be made publicly available for a minimum of **28 days**; and
 - (b) the planning proposal authority must comply with the notice requirements for public exhibition of planning proposals and the specifications for material that must be made publicly available along with planning proposals as identified in section 6.5.2 of *A guide to preparing local environmental plans* (Department of Planning and Environment, 2018).

6. A public hearing is not required to be held into the matter by any person or body under section 3.34(2)(e) of the Act. This does not discharge Council from any obligation it may otherwise have to conduct a public hearing (for example, in response to a submission or if reclassifying land).
7. The time frame for completing the LEP is to be **18 months** following the date of the Gateway determination, expiring on 29 November 2021.

Dated 29th day of May 2020.

A handwritten signature in black ink, appearing to read 'Sarah Lees', is positioned above the printed name and title.

Sarah Lees
Director Southern Region
Local and Regional Planning
Department of Planning, Industry and
Environment

Delegate of the Minister for Planning
and Public Spaces



The General Manager
Bega Valley Shire Council
PO Box 492
BEGA NSW 2550

Our ref: DOC21/85051-3

Your ref:

Attention: Sophie Thomson
council@begavalley.nsw.gov.au

12 March 2021

Dear Sophie

Subject: Planning Proposal Pre-Gateway advice – South Pambula

Thank you for providing this planning proposal to Biodiversity and Conservation Division (BCD) for our pre-gateway advice. We have reviewed the draft planning proposal and provide the following advice.

Although BCD understands that Site 1 will be withdrawn from the final version of this planning proposal, we recommend that future planning proposals for this site should propose the zoning to be E3 Environmental Management with a Minimum Lot Size of 120ha to reflect the validated high environmental values (HEV) of the site.

As the planning proposal for Site 2 will facilitate future development at the site, and will result in biodiversity impacts that trigger the Biodiversity Offset Scheme (BOS), BCD recommends that biodiversity is assessed as part of the planning proposal using Stage 1 (as a minimum) of the Biodiversity Assessment Method (BAM).

To be consistent with the Section 9.1 Planning Direction 4.3 Flood Prone Land and the principles of the Floodplain Development Manual, the implications of the full range of floods up to the Probable Maximum Flood (PMF) should be considered by council. As this proposal is affected by flooding, DPIE recommends that Bega Valley Shire Council augments the information available from the Pambula River, Pambula Lake, Yowaka River Flood Study at Pambula and surrounds with a site specific FIRA to inform its determination.



The Planning Proposal should be updated to reflect the changes to Section 9.1 Ministerial Directions. Ministerial Direction 2.2 Coastal Protection should be replaced with 2.2 Coastal Management and this section of the document updated to consider relevant coastal management areas, coastal hazards and Coastal Zone Management Plans. Please contact the Water Floods and Coast team, John Murtagh on 0242244154 to discuss any aspects of the flooding comments.

For further detailed comments please refer to Attachment 1. Please contact Lyndal Walters on 02 6229 7157 if you would like to discuss our comments.

Yours sincerely,

A handwritten signature in blue ink that reads 'Allison Treweek'.

ALLISON TREWEEK
Senior Team Leader
South East, Biodiversity and Conservation

Cc: Graham Judge – Planning & Assessment, DPIE

Enc: Attachment 1 – Detailed comments on the South Pambula planning proposal

Attachment 1 – Detailed comments on the South Pambula planning proposal**Site 1 – Lots 451-453 DP747031 and Lot 1 DP 1088971, Lloyds Street/Princes Highway, South Pambula**

We understand that the zoning of these Lots is currently a deferred matter and that the landowner has withdrawn from the planning proposal as they no longer wish to develop the site.

We note, however, that these Lots have been described in the Bega Valley Rural Residential Strategy 2020 as constrained land and are not included in the area that has been endorsed by Council and DPIE for future development.

As such, BCD recommends that any future planning proposal for Site 1 would propose to zone it E3 Environmental Management with a Minimum Lot Size of 120ha. As previously advised, these lots contain validated high environmental value (HEV) land, including the presence of threatened species including yellow-bellied gliders, and should be zoned to be consistent with Ministerial Direction 2.1 and 5.10.

LEP Practice Note PN09-002 provides further guidance on the applicability of E zones. In particular, that E3 Environmental Management is for land where there are special ecological attributes that require careful consideration/management and for uses compatible with these values.

BCD has previously objected to the rezoning of the land to E4 with MLS of 1Ha based on the impacts that this would have on the biodiversity values of these lots, and would be likely to object to any similar proposals in future planning proposals.

In addition, we note that the Zenith Report that is attached to this planning proposal is not related to Site 1 or 2, and the correct report should be provided at the Gateway.

Site 2 - Lot 711 DP 1128593, 23 Summerhill Road, Greigs Flat**Ministerial Direction 2.1 Environmental Protection Zones**

This direction requires that a planning proposal must include provisions that facilitate the protection and conservation of environmentally sensitive areas.

It is unclear in the current planning proposal how this will be achieved. Further details addressing this should be provided in the revised planning proposal and are set out below.

Ministerial Direction 5.10 – Implementation of Regional Plans

This direction requires that planning proposals must be consistent with a Regional Plan. The current proposal does not appear to be consistent with the South East and Tablelands Regional Plan 2036 (the Plan).

The plan requires that the 'avoid, minimise and offset' hierarchy be applied to areas identified for new or more intensive development. The hierarchy requires that development avoid areas of

validated high environmental value and considers appropriate offsets or other mitigation measures for unavoidable impacts.

The planning proposal has not addressed how the actions in the Regional Plan will be met. An assessment in accordance with Stage 1 of the Biodiversity Assessment Methodology (BAM) will assist in providing the information required to address these actions, and any inconsistencies will need to be justified in accordance with the following;

(5) A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Secretary of the Department of Planning and Environment (or an officer of the Department nominated by the Secretary), that the extent of inconsistency with the Regional Plan:

(a) is of minor significance, and

(b) the planning proposal achieves the overall intent of the Regional Plan and does not undermine the achievement of its vision, land use strategy, goals, directions or actions.

Stage 1 BAM Assessment

As the planning proposal will facilitate future development at the site, and will result in biodiversity impacts that trigger the Biodiversity Offset Scheme (BOS), BCD recommends that the biodiversity values are assessed as part of the planning proposal using Stage 1 (as a minimum) of the Biodiversity Assessment Method (BAM).

Application of the BAM by an accredited assessor will identify the biodiversity values present on the site. This information can be used to inform decisions to avoid and minimise impacts and will provide the appropriate level of evidence to develop a constraint layer to inform the planning proposal. It will also help to identify the biodiversity values that may require offsets for future development, and this can be further considered in the plan making process. Completion of Stage 1 of the BAM provides a solid foundation for the assessment of biodiversity impacts at the development application stage.

The current planning proposal does not provide sufficient detail to identify the biodiversity values of the site such as plant community type (PCT), mapping of vegetation zones, or Vegetation Integrity Score (VIS).

It is unlikely that BCD would support the planning proposal for Site 2 in its current form without further information on the biodiversity values of the site. In addition, to an assessment in accordance with Stage 1 of the Biodiversity Assessment Method (BAM), the planning proposal should address the suitability of the site for Biodiversity Certification for the following reasons .

- Parts of Lot 711 DP 1128593 have been described in the Rural Residential Strategy 2020 as constrained land due to its high environmental value and is not part of the area that has been endorsed as part of the Strategy by DPIE.
- There is insufficient data provided to describe the biodiversity values of the site including the Plant Community Types (PCT) present on the site, vegetation zone mapping Vegetation Integrity Score (VIS) and threatened species habitat.

- Parts of Lot 711 DP 1128593 are mapped as having high environmental value (HEV), including proposed Lot 1 and 4.
- Figure 3 of the Local Environmental Solutions November 2015 report shows a number of hollow bearing trees within the proposed Lots 3 and 4, and a number of hollow logs on the ground in proposed Lot 1.
- Substantial clearing will be required to provide for Asset Protection Zones which will result in a loss of almost all vegetation on proposed Lot 1 and 4, and given there is insufficient information on the rest of the PCTs on the site it is unknown what impact clearing on other areas of the site will have.

Biodiversity Certification

Biodiversity certification is another tool available under the *Biodiversity Conservation Act 2016* (BC Act) that is designed for strategic planning. The BC Act introduced new provisions for biodiversity certification so that individuals as well as planning authorities can now seek biodiversity certification.

Biodiversity certification can be used at the planning proposal stage to streamline the biodiversity assessment process and provide certainty for areas of land that are proposed for future development.

The process identifies areas that can be developed after they are certified and measures to offset the impacts of development. An accredited assessor will need to apply the BAM to the area subject to the biodiversity certification proposal and produce a Biodiversity Certification Assessment Report (BCAR). Where land is certified, development may proceed without the usual requirement for site by site biodiversity assessment.

This provides upfront certainty to developers and the community about the development potential and conservation outcomes for an area.

Further information on biodiversity certification can be found on our website at <https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/biodiversity-certification>

Vegetation in Non-Rural Areas 2017 SEPP and Bega Valley Development Control Plan (DCP)

The planning proposal should include consideration of the *Vegetation in Non-Rural Areas 2017 SEPP* as if the land is E zoned then this SEPP will apply. This means that the Bega Valley Shire Council DCP will apply to clearing activities.

Bega Valley Shire Council Rural Residential Strategy 2020

The planning proposal refers to the Bega Valley Shire Council Rural Residential Strategy 2020 and states that the subject site is part of the South Pambula rural-residential release area (Pambula Catchment No. 4) and is suitable for rezoning to enable further rural-residential subdivision.

However, DPIE have not endorsed this part of the Rural Residential Strategy 2020 as further information is needed before it can be determined whether it is suitable land. This area was previously numbered Area 5 of the Pambula Catchment prior to the final version of the Rural Residential Strategy 2020 being finalised by Council and has not been endorsed by DPIE.

Floodplain Risk Management

DPIE notes that Bega Valley Shire Council is currently undertaking the Pambula River, Pambula Lake, Yowaka River Flood Study at Pambula and surrounds which incorporates the area subject of the February 2021 pre-gateway consultation on the draft planning proposal (PP) for Lots 451-453 DP 747031 and Lot 117 DP 1128593.

DPIE also notes that the supplied draft PP identifies that the lot contains numerous watercourses many of which have not been the subject of a flood study or flood risk management study or plan. The draft PP identifies that the Section 9.1 Planning Direction 4.3 Flood Prone Land is not applicable. While DPIE acknowledges that the Pambula River, Pambula Lake, Yowaka River Flood Study at Pambula and surrounds identifies limited flood impact on the site from the Yowaka River, the Flood Study provides no information on the flood behaviour of the tributaries draining across the site. Additional analyses in the form of a site specific Flood Impact Risk Assessment (FIRA) of the tributary streams will be required to inform the relevant flood constraints which will need to be considered and managed in the planning proposal assessment process and subsequent determination.

Given the presence of the tributary watercourses there is flood prone land on the sites. The Section 9.1 Planning Direction 4.3 Flood Prone Land states:

“(3) This direction applies when a council prepares a draft LEP that creates, removes or alters a zone or a provision that affects flood prone land.”

As the planning proposal pertains to altering zones pertaining to the land the Section 9.1 Planning Direction 4.3 Flood Prone Land applies.

For the determination of this matter to be consistent with the Section 9.1 Planning Direction 4.3 Flood Prone Land and the principles of the Floodplain Development Manual the implications of the full range of floods up to the Probable Maximum Flood (PMF) should be considered by council.

As this proposal is affected by flooding, DPIE recommends that Bega Valley Shire Council augments the information available from the Pambula River, Pambula Lake, Yowaka River Flood Study at Pambula and surrounds with a site specific FIRA to inform its determination.

As a minimum the FIRA should determine:

- The extent of flood prone land, which is the area inundated by the Probable Maximum Flood as well as peak levels, depths and velocities.
 - This identifies how much of the site is subject to the application of Section 9.1 Planning Direction 4.3 Flood Prone Land
 - It also provides the basis of assessment of the flood range above the 1% AEP flood level and hazard in areas outside the FPA where dwellings will be sited
- The peak levels, depths and velocities across the site in the 1% AEP flood.
- Identification of proposed Flood Planning Levels across the site and the Flood Planning Area
- The impact of flooding on the proposed development;
- The impact of the proposed development on flood behaviour (particularly any offsite flood impacts because of potential encroachment, land use and land form changes);

- The impact of flooding on the safety of people for the full range of floods including issues linked with isolation and accessibility for emergency services; and
- The implications of climate change (particularly increased rainfall intensity) on estimated flood planning levels.
- Pre and post developed flood hazard across the site and adjoining residential areas over the full range of potential floods;
- Pre and post developed floodways within the site and within adjoining residential development for the 1% AEP flood
- Strategies to facilitate flood access and evacuation of residents and other visitors, if there is potential for isolation;
- Trafficability of the proposed road network both on and off site and any culvert structures across watercourses;
- Afflux associated with proposed road and culvert structures over watercourses, including potential implications for proposed lots upstream of structures; .
- Propose and assess the effectiveness of management measures required to minimise the impacts of flooding to the development and to minimise risks on existing and future community due to the proposal

Should Council require any further advice on floodplain risk management matters, please contact the DPIE.

Coast and Estuary Management

Site 1 and Site 2 both drain to Pambula estuary with areas of coastal wetland located downstream. Potential risks to the health of the estuary include sediment runoff, stormwater runoff and effluent. The PP has noted soils with a weak structure that can generate significant volumes of soil near Summerhill Road as well as the presence of steep slopes and drainage gullies in both Sites 1 and 2. The Site 2 REF recommends sediment migration measures to minimise sediment migration off site and into drainage lines and streams. We note that the PP includes provision for riparian buffers across the sites.

Clearing and development will lead to additional runoff and increased risk of erosion, therefore the PP should outline a higher level of stormwater management considering both quality and quantity of run off. Noting that some of the site is steep with high erodibility the PP should outline if the development would have onsite detention and holding of runoff to ensure it doesn't increase velocity and impact quality of flows draining into the estuary.

DPIE note that the south-eastern portion of Site 2 is located with the Coastal Environment and Coastal Use areas with the SEPP (Coastal Management). The Planning Proposal indicates a larger lot size for areas mapped under the SEPP and concept plans suggest that developments could be located within existing cleared areas. The PP includes a brief discussion of considerations under the CM SEPP and considers that the development can be sited and designed to avoid and minimise adverse impacts on coastal environmental values and will not result in effluent discharge, or untreated stormwater discharge that could impact water quality.

It is recommended that further detailed explanation be given to address each of the considerations for development in a Coastal Environment Area. In particular further details on potential threats to consider may be stormwater management, effluent management, and sediment runoff. The PP shows that the majority of the subject site is outside of Developer Serving Plans and will need on site effluent disposal, therefore sewage leachate could be a potential threat to estuary health.

The Planning Proposal should be updated to reflect the changes to Section 9.1 Ministerial Directions (previously Section 177). Ministerial Direction 2.2 Coastal Protection should be replaced with 2.2 Coastal Management and this section of the document updated to consider relevant coastal management areas, coastal hazards and Coastal Zone Management Plans.

As part of Site 2 is located within the coastal zone the PP should also clarify whether any of the area is impacted by coastal hazards, and how any impacts would be avoided or mitigated, if relevant.

DPIE note that Council has a certified Pambula Lake Estuary Coastal Zone Management Plan. Council will need to address Section 9.1 Planning Direction 2.2 Coastal Management (4) (d) "A planning proposal must include provisions that give effect to and are consistent with any relevant Coastal Management Program that has been certified by the Minister, or any Coastal Zone Management Plan under the Coastal Protection Act 1979 that continues to have effect under clause 4 of Schedule 3 to the Coastal Management Act 2016, that applies to that land".

The Pambula CZMP continues to have effect under the Coastal Management Act until the end of 31 December 2021. Threats to the estuary identified in the CZMP that may be relevant to this PP include runoff from unsealed roads, stormwater, catchment clearing, onsite sewage leachate. Strategies within the CZMP have included bank erosion control, rehabilitating riparian buffers, and dirt track sealing.

The PP will need to show how it is consistent the management objectives in the CZMP.