

PLANNING PROPOSAL 24 CORONATION ROAD CONGARINNI NORTH

This Planning Proposal relates to land located at 24 Coronation Road, Congarinni North (Figure 1). The land is legally described as Lots 155 and 188 in Deposited Plan 755537 (Figure 2).

The land is currently used as a private rural property, containing one homestead and ancillary sheds and is zoned part RU1 Primary Production, Part E2 Environmental Conservation and Part E3 Environmental Management pursuant to the Nambucca Shire Local Environmental Plan 2010 (the LEP). The land is separated from the nearest residentially zoned land by a road (Coronation Drive) and a waterway known as Taylors Arm, flowing south from the Nambucca River. The site is approximately one kilometre northwest of Macksville Town Centre. Figure 3 demonstrates the site within the context of the town centre. Figure 4 provides a survey of the area, including topography, showing the steep incline raising the western portion of the site.

In 2009, a Site Compatibility Certificate application was lodged for the site pursuant to the requirements of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004. This Policy applies to land zoned primarily for urban purposes (of which rural land is excluded) and land adjoining land zoned for primarily residential purposes. The application was lodged under the latter scenario given the land across the waterway is zoned Low Density Residential (R2); however, due to the separation by the waterway and the roadway, the Department of Planning & Infrastructure (DP & I) was not satisfied that the site satisfied the test with respect to being 'land adjoining land zoned for urban purposes'.

The purpose of this Planning Proposal is to allow the subject land to be used for a seniors living development, having been identified for that purpose under the Council's Structure Plan in 2008, and having regard for the critical demand for such housing in the locality. Upon advice taken from the DP & I, it is recommended that the use of the land be permitted by an amendment to Schedule 1 of the LEP. As a result, the zoning of the land will remain unchanged.

Development of the land will be designed having regard to the known significant environmental constraints on the site, namely flooding; bushfire hazard; flora and fauna habitat; acid sulphate soils; and coastal wetlands. These constraints are reflected in the maps under Part 4 of this proposal, including current local planning maps and relevant State and Regional Planning maps. Relying upon these, this document also

includes an indicative Masterplan demonstrating the development capacity of the land. The environmental constraints are confirmed by previously prepared consultant studies, included as annexures.

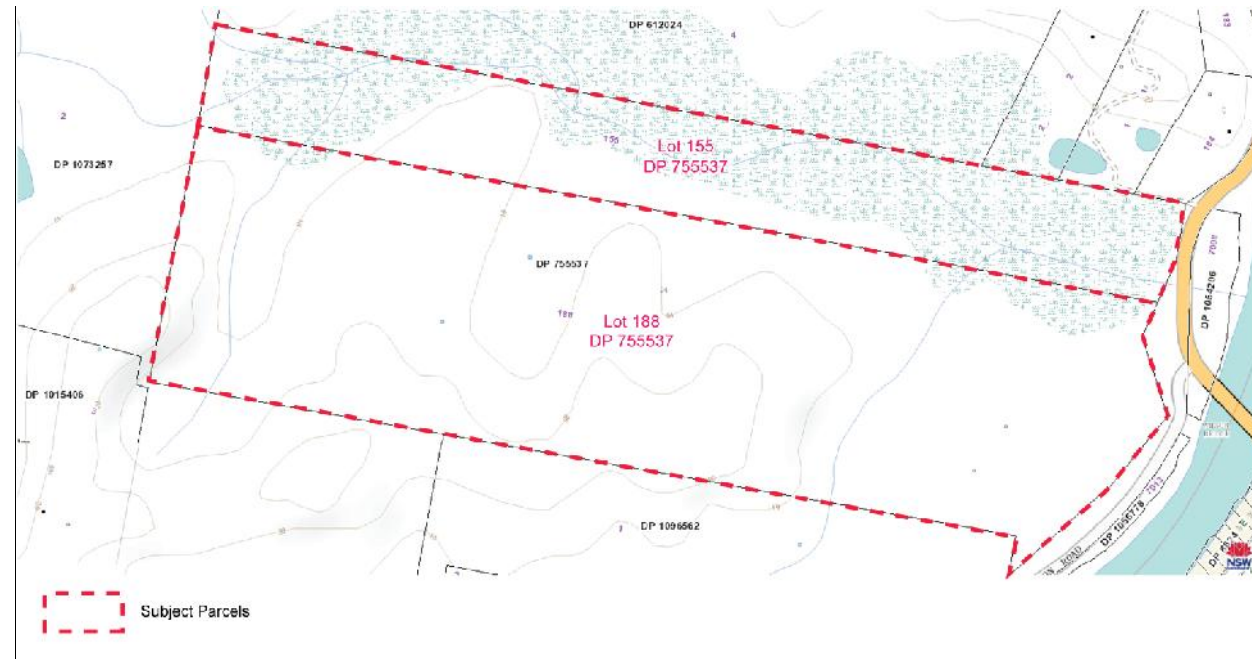
The residual land within the site, that is not environmentally constrained, provides opportunity for the proposed seniors living development that would be facilitated subject to the rezoning of the land. The unique environmental qualities of the curtilage will contribute positively to the amenity of the development, whilst still enabling these to be adequately protected to ensure they remain unaltered. As such, this planning proposal is submitted to Nambucca Shire Council and the DP & I for their consideration.

Figure 1: Aerial



Source: <http://maps.six.nsw.gov.au/>

Figure 2: Lot & DP Plan



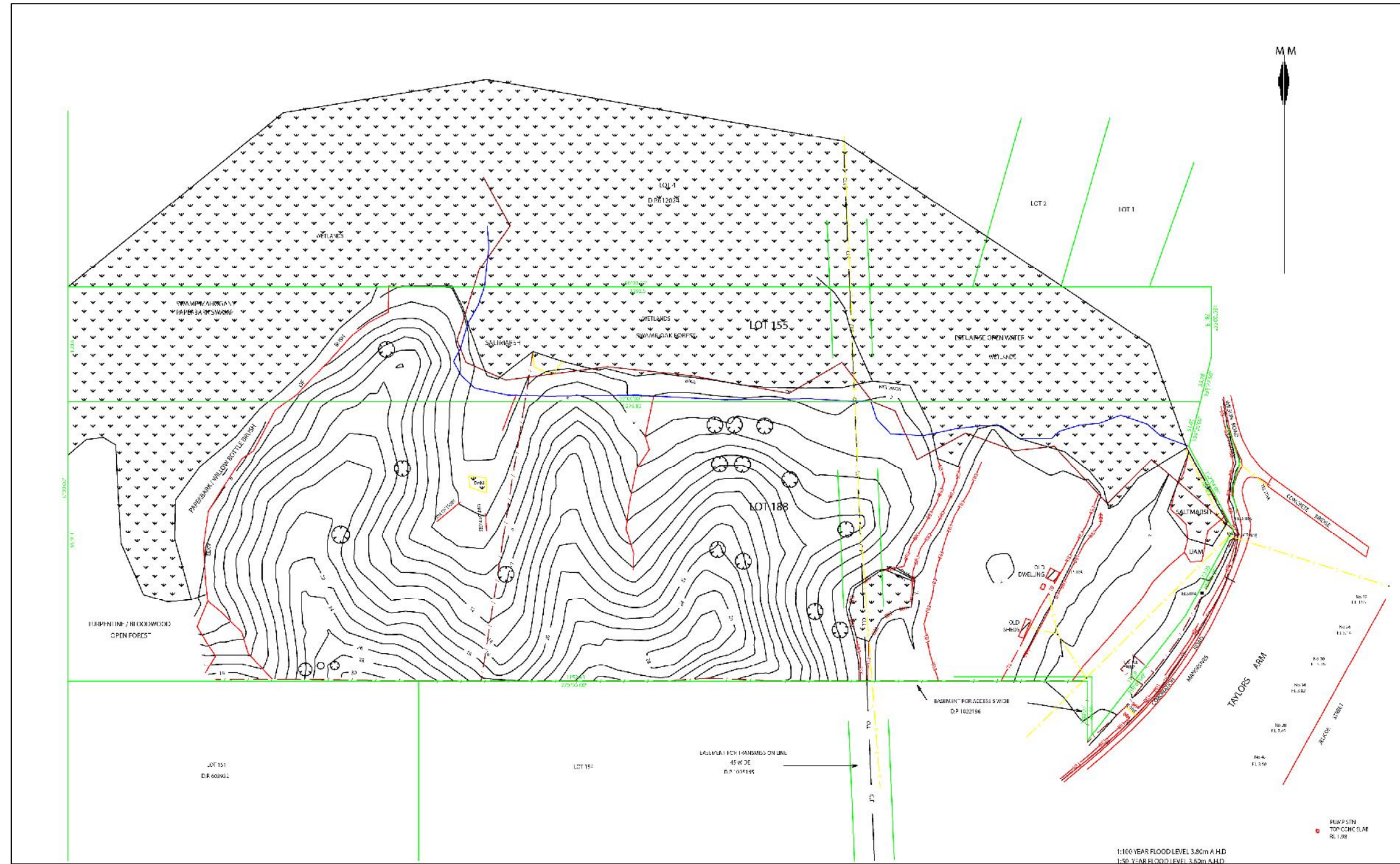
Source: <http://maps.six.nsw.gov.au/>

Figure 3: Local Context Map



Source: www.google.com.au

Figure 4: Site Survey



Source: Amos and McDonald

PART 1

What are the Objectives or Intended Outcomes of the Proposal?

The objectives are:

1. To enable development of the site at 24 Coronation Drive North Congarinni for a seniors living development.
2. To develop the land without detrimental impact upon the adjoining wetland, flora and fauna habitats, and prevalent ecosystems.
3. To ensure that the future use of the land is protected against threats of flooding or bushfire, as well as acid sulphate soils conditions.
4. To ensure the development has adequate access to essential social and health and emergency services.
5. To ensure the development relates appropriately to the surrounding land uses.
6. To respond to the significant demand for seniors housing in the locality.

PART 2

Explanation of the Provisions

To facilitate the Objectives, the following amendment to Schedule 1 of the Nambucca Shire LEP 2010 will be required:

3 Use of certain land at 24 Coronation Drive, North Congarinni

This clause applies to land being Lots 155 and 188, DP 755537, known as 24 Coronation Drive, North Congarinni..

- (1) Despite any other provisions of this plan, development for the purpose of a seniors living development is permitted with development consent from the Council.

PART 3

Justification

Section A – Need for the Planning Proposal

1. Is the Planning Proposal the result of any strategic study or report?

Structure Plan 2008

The proposal is in direct response to the Nambucca Shire 20 Year Structure Plan prepared in March 2008, which identifies the site as a potential 'Business Park, Educational Facility or Seniors Living Development' (Page 205). The Structure Plan refers directly to the need for amendments to the current LEP to enable the recommendations of the Plan to be facilitated.

Despite the environmental considerations for the site, the Structure Plan identifies the land as containing 'manageable environmental constraints for future development' (Page 61). It is considered that the environmental constraints, and its more extreme topography, severely reduce its potential for primary production, despite being zoned for such.

Given the proximity of the site to the Town Centre of Macksville and its associated services, the site lends itself to a more developed use, where such development may be compatible with, and designed to take account, the identified environmental constraints.

With regard to the proposed use as seniors living, the evidence of the demand is prevalent at all levels of Government documentation. The Council's Structure Plan 2008 highlights:

"The area of Aged Care needs special attention due to the growing popularity of Nambucca as a 'sea change and tree change' location and as a retirement area. The large proportion of people within the 60 to 74+ age cohort in Nambucca now, 18.4 %, means that future growth will place an increasing strain on the facilities that exist (ABS, 2006). Future population projections emphasise even greater growth in this age group. (Page 127)

More up-to-date demography can be found in the Council's Socio-Economic Portrait prepared in 2010, which shows that Nambucca Shire's population has noticeably larger proportions aged between 55 and 69, than the corresponding groups across the Mid North Coast region. Between 2004 and 2008, the age group between 60 and 64 years had the largest growth (up 6.9% per year), followed by those over 80 years of age (up approx. 4% per year). It is also evident that the largest proportion of the current population is the group aged between 45 and 64 years, which will be reaching retirement progressively over the next 20 years (Page 6).

Similarly, the Mid North Coast Regional Strategy prepared in 2009, and discussed in more detail below, states that *"the median age for the Region is expected to increase from 44 years in 2006 to 55 years in 2031, and the population aged 65 years and over will more than double"* (Page 6).

Similarly, the NSW Government's 25-year Strategy for Sustainable Centres aims to *"increase opportunities for medium-density housing in key centres to match the ageing of the Region's population"*. (<http://www.planning.nsw.gov.au/mid-north-coast>)

The proposed provision of seniors living accommodation in this locality therefore responds logically to the evident critical demand for such as is documented at the local, regional and State level.

A full assessment of the proposal against the Regional Strategy will follow.

2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there another way?

The proposed changes to the planning instruments are the only means by which change may be affected for the site. There are three means for doing this:

1. Allow for a site-specific re-zoning of land to a less restrictive zoning or a Special Use zone for the purpose;
2. Allow for the specified use to be permissible with consent within the existing RU1, E2 and E3 zones on the site;
3. Amend Schedule 1 of the LEP to allow for the specified use on the land.

As mentioned previously, an application for a Site Compatibility Certificate was lodged with the then Department for Planning in 2009 under the SEPP (Housing for Seniors or People with a Disability) 2004. However, due to the separation of the site from the adjacent urban and residential land by the waterway and roadway, the site was not considered to satisfy the test as land adjoining land zoned for urban purposes, as required under the SEPP.

Having regard for this outcome, advice was then sought from the DP & I as to the best means to permit development for the purpose of seniors living.

In terms of Option 1 and 2 set out above, the DP & I advised that, given the recency of the LEP 2010, a number of the broader issues for zoning had been dealt with at that stage and the required land supply established at the time when those zones were committed. It was also considered that, if the intended use

was permitted within the zones, at a generic level, then ad hoc planning applications may be brought forward to the Council that were not individually appropriate to the site.

Having regard to the level of detailed consideration undertaken of this site, having regard to its environmental considerations, a Schedule 1 amendment to the LEP was determined to be the most appropriate mechanism. The primary reason for this is that a use and development layout has been carefully considered and balanced with the environmental constraints.

This Planning Proposal is therefore prepared on the basis of Option 3.

Section B – Relationship to Strategic Planning Framework

3. Is the planning proposal consistent with the objectives and actions contained within the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)

The land is subject to the Mid North Coast Regional Strategy 2009, prepared by the then NSW Department of Planning. The strategy identifies the key challenges for the Region and then provides the Strategy for which to best overcome these challenges.

Relevant to this proposal are the key environmental challenges that relate to balancing development and urban growth with the significant environmental assets of the area such as the wetlands, estuaries and flora and fauna. Also is the challenge of understanding and managing natural hazards such as flooding, bushfire and acid sulphate soils.

Several expert reports have been undertaken in preparation of the previous application for the site and remain relevant for the purpose of preparing this planning proposal to better inform the environmental constraints and subsequently, the indicative master plan. These expert assessments would also be used to ensure best practice design and management of the site into the future.

With regard to the nature of the development, the Strategy identifies a significant demand for housing for the ageing population, with specific encouragement of multi-unit style accommodation. The Strategy encourages the provision of multi-unit style housing to be increased from the existing 20% of new housing up to 40% of new housing. The Strategy also directs that such housing is to be located within close proximity to one of the four regional centres, or one of the six major towns in the locality, of which Macksville is included.

Under the Strategy, all urban growth is directed to the identified Future Growth Areas for each Town and Centre. The subject site, however, falls just outside this area which, for Macksville, is bound by the waterway adjacent to the site. As this area is also outside the identified 'Coastal Area' In accordance with the Strategy, the proposal must satisfy the Sustainability Criteria found under Appendix 1.

Sustainability Criteria

1. Infrastructure Provision

The site currently has town water connected to the existing homestead. The sewer, it is understood, is connected at the front site boundary, at Coronation Drive. The site also shows

evidence of an existing electricity connection. It is unknown at this time if telephone or internet connections are available. It is understood that utilities capacities would need to be upgraded, at the developers cost, to facilitate necessary augmentation of these as part of future development.

Private open space will form part of the development due to the environmental affectations of the site. These features will become part of the overall design and appeal of the complex.

2. Access

The following assessment of access was made under the previous proposal in 2009 by Innovation Planning Australia:

The entrance to the site is located on a bitumen sealed rural standard road with grass verges. The entrance is less than 100 metres from the 50kph speed zone for the residential area of Macksville. This site is on the school bus route, however, there are no formal bus stops identified between the site and the central business area of Macksville.

The site is some 800 metres from the central business area with a pedestrian footpath constructed from Wilson Road and along Joffre Street, Tilly Willy Street and Mackay Street connecting to the central business area.

Macksville train station is also located at the end of Station Street and is serviced by Countrylink trains. (Page 17)

In addition to the availability of existing services, it is the intention of this proposal that a private Shuttle bus service would also run from the site into town to service the occupants who do not have access to private transport or are unable to walk to town. The road bridge at Joffre Street has also recently been upgraded which will further facilitate access.

3. Housing Diversity

The proposed seniors living would provide an array of smaller sized homes suitable for occupants aged over 55 who may or may not be retired, and who may or may not need additional care facilities. The Council's Structure Plan 2008 and the Mid North Coast Regional Strategy both refer to a need for not only increasing housing for older people, but an increased diversity of housing for older people, as the bulk of the existing housing stock is in the form of detached houses which is less suitable in terms of costs, maintenance and manageability for older people.

The proposed seniors living would provide a more affordable home suitable for smaller households, which are designed to be more adaptable for those who are permanently or

temporarily managing a disability. Such a disability could include recovery from surgery, deteriorating eyesight or mobility difficulties. Home maintenance would also be managed holistically throughout the complex which is of additional benefit to those who are less able to undertake or manage tradespeople and finances for such necessities.

4. Employment Lands

The existing site has been disused for some years and does not provide employment. As discussed previously, the environmental constraints on the land and the topography limit any opportunity the land could provide in terms of primary production. That is, the topography would not easily allow for grain or produce planting and harvesting, and the terrain would not easily lend itself to animal grazing.

The proposed development would provide employment in the form of management and clerical staff, food preparation, cleaning and maintenance roles, as well as professional roles in health services and therefore would assist employment opportunities within the region.

5. Avoidance of Risk

Review of the Nambucca Shire Floodplain Risk Management Plan shows that the subject site is adjacent to a floodway which can swell to a height of 3.8 metres (AHD) in a flood event encroaching part way into the site, as shown at Figure 4. That flood level has an annual exceedence probability (AEP) of 1%, that is each year there is a 1 in 100 chance the level will be reached or exceeded.

Although that part of the site is identified as being unsuitable for new residential development, it is considered that given the extreme slope of the land, the development may be accommodated on areas of higher ground, outside the floodway with a floor level of +0.5m above the identified maximum flood level. An expert report prepared by Cardno Willing Pty Ltd in 2004 concurs with this approach.

The existing high slope of the land will be used to aid flood protection and modified, where necessary, to aid construction and ensure compliance with the accessibility standards applicable to seniors living developments. Lifts and ramps will be incorporated to aid pedestrian mobility throughout the development.

A draft Bushfire Risk Assessment has been undertaken by Steven Ellis. This document has considered the existing vegetation on the site and in the locality, the topography of the land, the possible layout of buildings (under the previous Site Compatibility Application), building materials, and local road connections. The details of fire-proofing, sprinkler systems, emergency contacts etc

cannot be finalised at this stage. However, consideration has been given to the nature of the site and the more limited mobility of the large number of aged residents. The report directs that, *"The facility should be designed and intended to be self-sufficient. The logistics of relocating such a large number of residents makes evacuation undesirable. Mass evacuation should be avoided at all costs."* (Bushfire Evacuation Plan - Appendix C). This means that an area within the development will need to be identified as a safe assembly point in the likely event of an emergency, and from there, in extreme circumstances, residents would be evacuated by bus.

6. Natural Resources

The subject site is currently non-productive land and is significantly environmentally constrained for primary production purposes.

With regard to water resources, the site is connected to town water and the proposal is unlikely to demand any additional quantity of water due to its location outside the identified future growth area. There are insufficient available sites within the identified future growth area to meet the growing demand for aged care within the locality.

7. Environmental Protection

A preliminary report for Flora and Fauna was prepared by OzeECOManagement Pty Ltd for the site in 2004. The report identifies the wetlands along the northern site boundary to be an estuary wetland area protected under State Environmental Planning Policy 14 – Coastal Wetlands,

Furthermore, the Saltmarsh in that area, as well as the forest area in the northwest corner of the site, are respectively listed and preliminarily listed, as endangered ecological communities under the Threatened Species Conservation Act 1995.

That same forest area also contains potential habitat for 25 threatened fauna species, including Koalas, and is therefore protected under State Environmental Planning Policy 44 – Koala Habitat Protection.

There is also a significant nest tree of the White-bellied Sea-Eagle or the Osprey within the forested area, which is required to have a protection zone of 100-metre radius around the tree.

Despite these special and unique ecological aspects which must be protected, the site contains a significant portion of cleared pasture grassland, which is relatively unconstrained from an ecological perspective. It is within this portion that the built development is proposed to be contained within. The environmental quality of the periphery is intended to be completely protected and enhanced so as to be a feature and an attraction of the development.

8. Quality and Equity in Services

The site is excellently placed for access to Macksville and all the shops, services and transport connections it has to offer. Nambucca Heads is also less than half an hour's drive providing further services. A summary is provided below:

Macksville:

BCU Community Bank
Woolworths
Hospital
Bawrunga Medical Services
Hairdressers (2)
Nails / Beautician
Aquatic Centre
Library
Senior Citizens Centre
Veterinarian
RSL Club
Public Hotel
NAB bank
Post Office
Medicare
Pharmacy
Ambulance Station
Funeral Directors
Anglican Church
Catholic Church
Jehovah's Witness
Salvation Army

Nambucca:

Riverside Garden High Care
Retirement Village
RSL Club
Centrelink
Funeral Director
ANZ Bank
NAB Bank
GIO Insurance
C3 Church

4. Is the planning proposal consistent with the local Council's Community Strategic Plan, or other local strategic plan?

As identified above, the site is identified under the Council's Structure Plan 2008 as a potential site for seniors living; however, the site falls outside the mapped future growth area for Macksville under the Mid North Coast Regional Strategy 2009.

Despite this, discussions with the Council and the regional office of the DP & I to date are supportive of the site's ability to accommodate the intended seniors living purpose, particularly having regard to the quality and availability of services within close proximity to the site that make it suitably accessible in this regard.

5. Is the planning proposal consistent with the applicable state environmental planning policies?

The planning proposal is to be considered in the context of the following State environmental planning policies:

State Environmental Planning Policy	Comment
14. Coastal Wetlands	The site contains protected wetlands identified as No.384 under the SEPP. Built development would avoid this area and expert recommendations for safe buffer distance and protection methods for safeguarding any effects from run-off and pollutants would be incorporated into the design. The indicative Masterplan demonstrates that these areas would be protected accordingly.
15. Rural Landsharing Communities	This does not apply due to the existing LEP zonings. Under the proposal these zonings will not alter.
19. Bushland in Urban Areas	This does not apply to the local government area.
30. Intensive Agriculture	This does not apply as the current and proposed use of the land is not for a piggery or cattle feedlot.
44. Koala Habitat Protection	Investigations would be undertaken as part of further studies; however, this is unlikely to be an issue in the event that development occurs only within the identified locations determined suitable.
55. Remediation of Land	Consideration for site contamination must be given for the making of the LEP amendment and under the assessment of any forthcoming development application. Previous uses of the land are unknown at this time. Where necessary, investigations would be undertaken as part of any future development application.
71. Coastal Protection	The site falls within the identified Coastal Protection zone illustrated on the map for this SEPP. Clause 8 which provides Matters for Considerations will be

	dealt with as part of any future development application preparation. Under the proposal, the built development will not encroach upon the identified area, and a further buffer zone will be preserved to ensure the environmental protection of the adjacent wetland and waterway. Further consideration of any environmental concerns regarding the site's flora, fauna and aquatic-life will be addressed as part of a development application. The proposed complex will be designed to be compatible with these unique surroundings.
(Housing for Seniors or People with a Disability) 2004	As discussed above, this SEPP does not apply due to the location of the site being separated from land zoned for urban purposes. The principles of the SEPP have nonetheless been incorporated into the proposal to ensure a comparable level of compliance with the intentions of the policy, having regard for the development's purpose.
(Infrastructure) 2007	Clause 101 pertains to development with frontage to a classified road, and requires that new development upholds the safety, efficiency and on-going operation of that road, as well as being compatible with associated noise and emissions from the road. The accompanying Masterplan includes preliminary consideration of these issues.

6. Is the planning proposal consistent with the applicable Ministerial Directions (Section 117 Directions)

APPLICABLE S. 117 DIRECTIONS	PRELIMINARY COMPLIANCE
2.1 Environment Protection Zones	The planning proposal does not involve any change to land on the site that is located within an Environment Protection Zone, other than preservation works identified as part of any future management plans in association with the development.
2.2 Coastal Protection	Consideration in the preparation of this proposal has

	been given to the coastal policies set out under part (4) of this Direction, as well as to SEPP 14, SEPP 71 and the Regional Strategy, all of which uphold related coastal policy. The proposal is considered compliant with these policies as it will preserve the identified coastal wetland which covers part of the site and allow also for an additional buffer zone to ensure the protection of this wetland. The design of the proposed development is considered consistent with the principles for ecologically sustainable development (ESD) as required under the NSW Coastal Policy 1997 in that the location and design of the development will be guided by expert reporting on the unique environmental constraints of the site.
3.4 Integrating Land Use & Transport	The site is suitably located to local shopping, health and other services. Regarding transport, as the development is for Seniors, or those with a disability, there will be a significant portion of occupants likely to have lesser or limited mobility. The development therefore lends itself chiefly to private transport. A shuttle bus is proposed to service the development. The site is walkable to the Macksville town centre. The accompanying Masterplan highlights adequate compliance with the identified policies.
4.1 Acid Sulfate Soils	As identified on the relevant map, the site contains areas of Class 2, Class 3 and Class 5 soils. The location and layout of potential land to be used for residential purposes is within the safest Class 5 soils area. Appropriate design mitigation controls may also be implemented to deal with likely or potential impacts, such as within areas of maximum excavation.
4.3 Flood Prone Land	The proposed use of land as set out on the indicative master plan is clear of land known to be flood prone.

	Sufficient design controls will be incorporated to ensure that the floor level will be above the required flood level.
4.4 Planning for Bushfire Protection	Similar to flood prone land, the location of future development is clear of areas that are affected by the potential threat of bushfire. Suitable setback zones have been incorporated into the indicative Masterplan to ensure adequate setback distances are incorporated.
5.1 Implementation of Regional Strategies	Compliance of the proposal, having regard for the relevant Regional Strategy is set out in this Planning Proposal and is considered suitable having regard to this direction.
6.3 Site Specific Provisions	The planning proposal will amend Schedule 1 of the Nambucca Shire LEP 2010 to allow the proposed land use on the land without imposing any additional development standards, consistent with the requirements of this Direction.

Section C – Environmental, Social & Economic Impact

7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

As identified under the Masterplan, the built element of the development may be suitably located outside those zones that have been identified as having the potential for these unique environmental conditions.

Further investigations are likely to be required as part of the development application process to ensure that there are no other environmental impediments to development and to ensure adequate safe-guarding.

8. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed

As stated previously, having regard for the existing known environmental constraints of the land, including flora and fauna, wetlands, flooding, acid sulfate soils and bushfire, it is considered that residual land may be managed for development for the intended purpose. Chiefly, this is to locate the built development away from these zones with adequate buffer distances, In addition, there will also be other methods adopted for limiting likely environmental impact on these areas including but not limited to: drainage, run-off, pedestrian access, road access, sediment control, and bushfire hazard management.

Further technical studies relating to flora and fauna, flooding, bushfire protection and other relevant testing, as required would be undertaken, as part of the planning process.

9. How has the planning proposal adequately addressed any social and economic effects?

As discussed earlier in this proposal, a thorough review of planning documentation in this locality and pertaining to this site specifically has been undertaken, upon which this proposal is based. The social need for seniors living accommodation is well documented and the subject site has been identified by the Council as being appropriate.

The development will serve a community need for aged persons housing as well as providing local employment and a potential increase in business for local services as a corollary effect of the increased local population. The facility will also provide a better suited diversity of accommodation for aged persons which will assist in this identified shortage. On this basis, the proposal is considered of social and economic benefit.

Should a full assessment in this regard be required, it can be completed as part of the planning process, at the next stage.

Section D – State & Commonwealth Interests

10. Is there adequate public infrastructure for the planning proposal?

As stated previously, the site is already connected to town water and may be connected to the town sewer with such works to form part of the development application. The site is believed to be connected to electricity but may need additional connection to the telephone network.

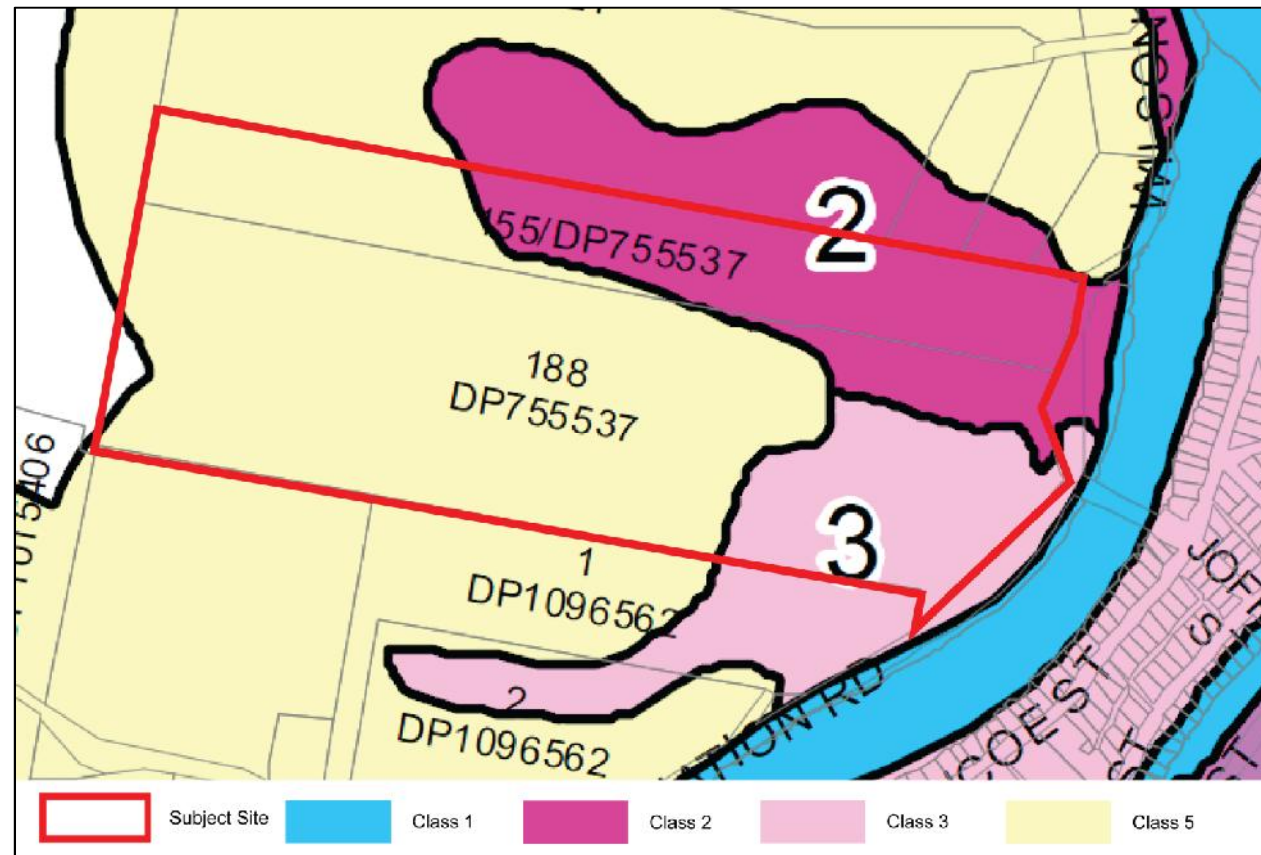
In terms of the road infrastructure surrounding the site, it is acknowledged that, as part of the planning proposal, it would be necessary for further traffic investigations to be completed. As a consequence, some level of upgrading works may be required to the road network in the vicinity of the site. This would be accommodated *via* a voluntary planning agreement, as required.

Further investigations may also be required for bus operators to improve upon the availability of public transport to service the site. The development will include an in-house bus shuttle service to Macksville Town Centre and other necessary locations as required to meet the demands of the future development.

11. What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

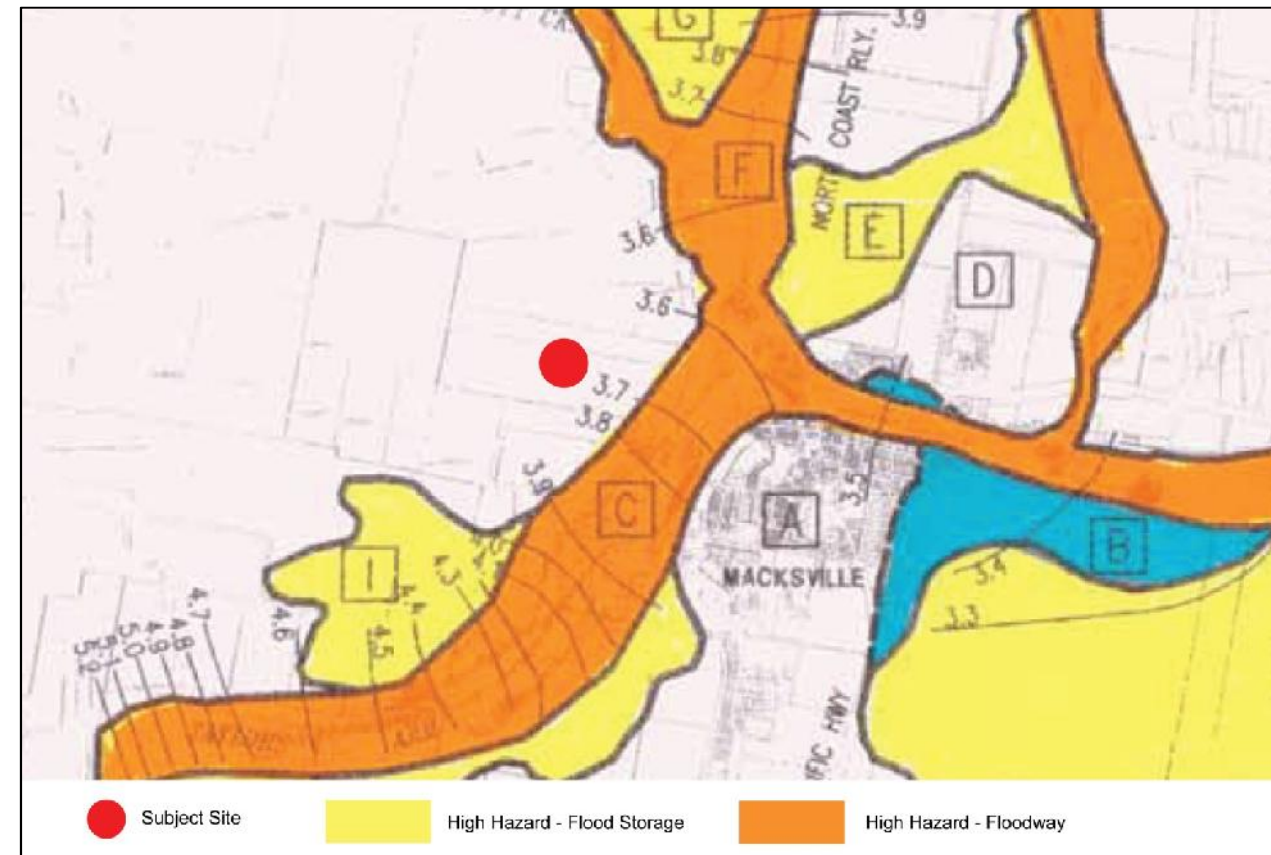
The proponent will be advised of these as part of the DP & I's consideration of this matter. In principle support, has been established at the Local and Regional levels of government.

Figure 7 – LEP Acid Sulphate Soils



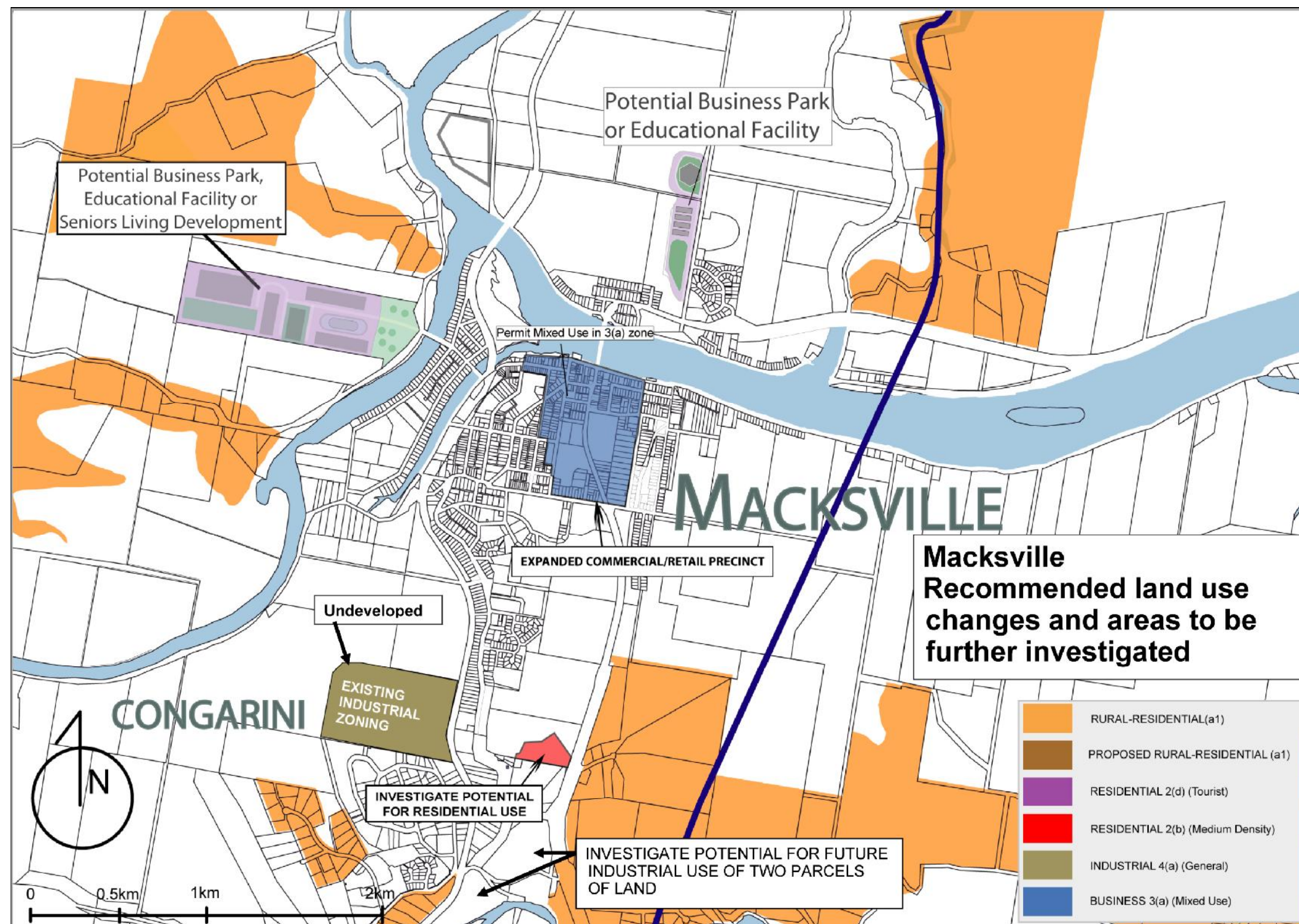
Source: <http://www.legislation.nsw.gov.au>

Figure 8 – Flood Hazard Map



Source: Floodplain Management Plan, Nambucca Valley Council

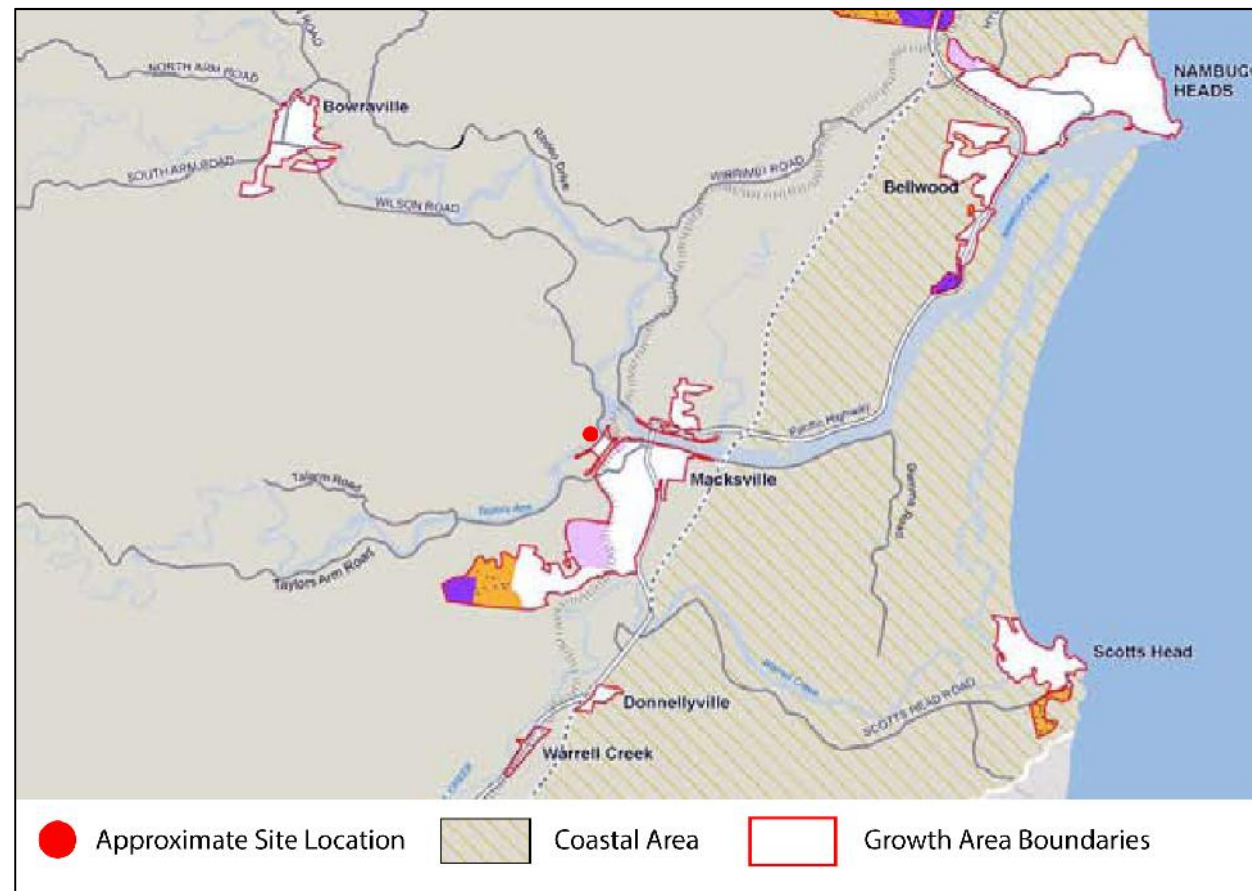
Figure 9 – Structure Plan 2008 Map



Source: Nambucca Valley Council

Mid North Coast Regional Strategy

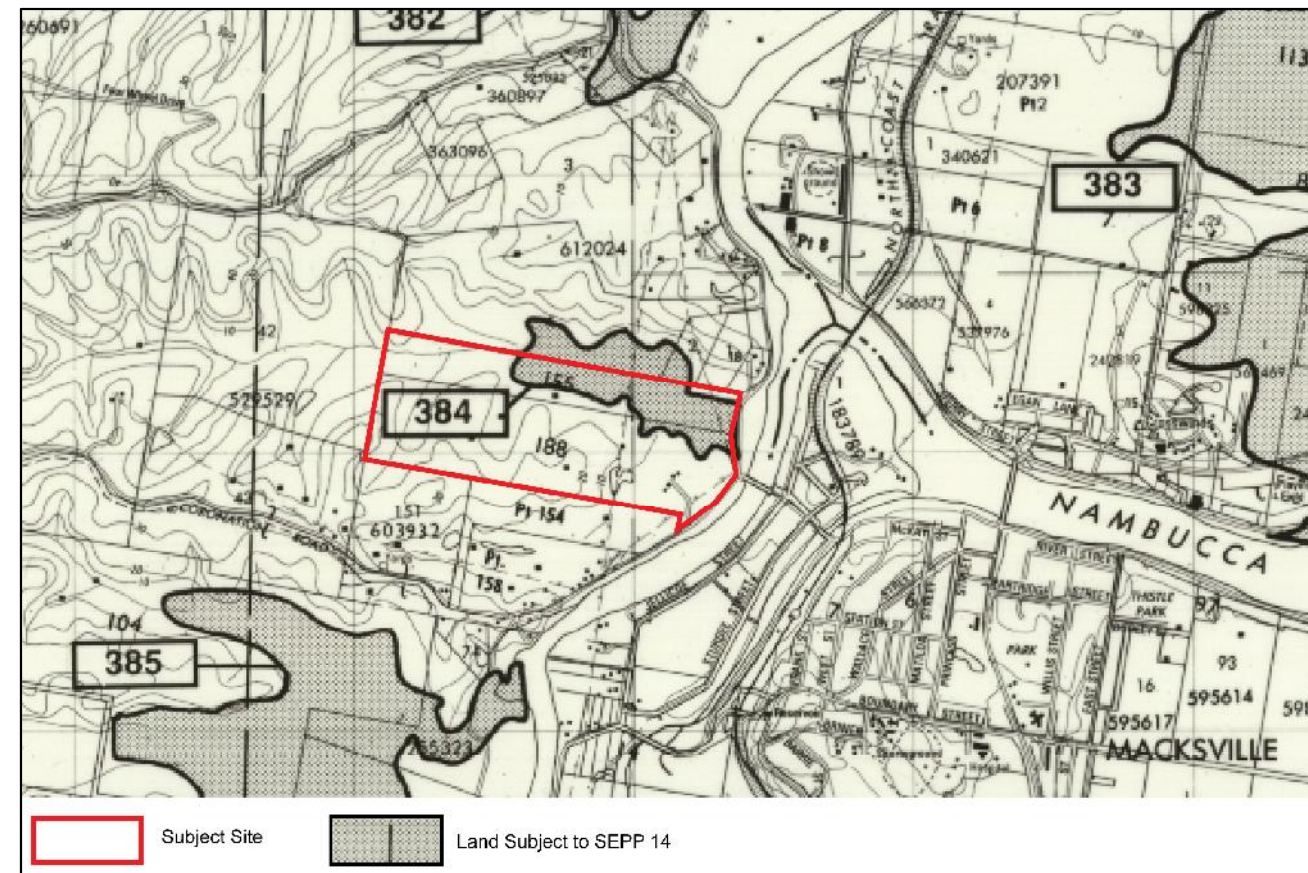
Figure 10 – Growth Areas Map 5



Source: Mid North Coast Regional Strategy, www.planning.nsw.gov.au

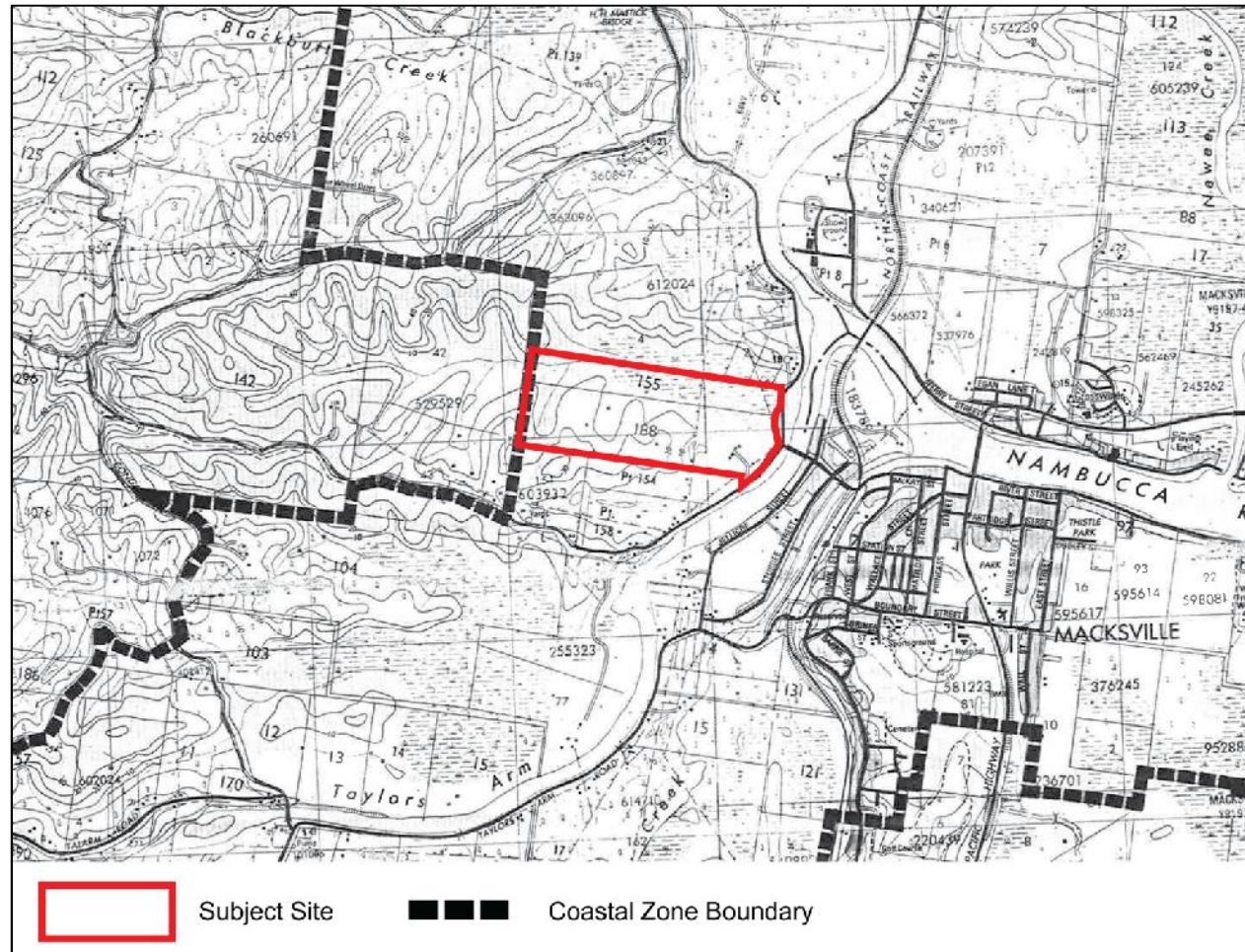
State Planning Maps

Figure 11 – SEPP 14 Map Extract



Source: Department of Planning and Infrastructure

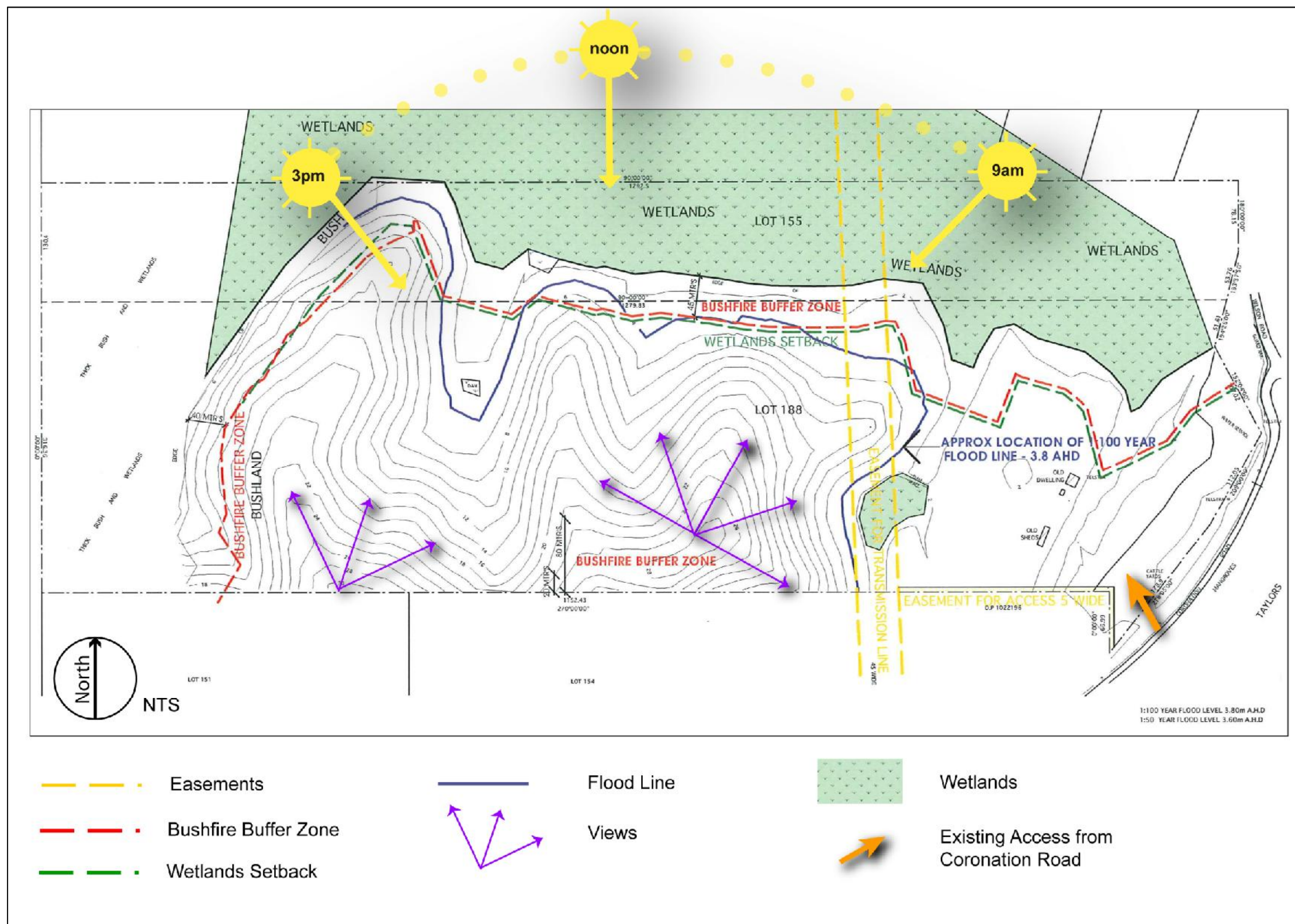
Figure 12 – SEPP 71 Map Extract



Source: Department of Planning and Infrastructure

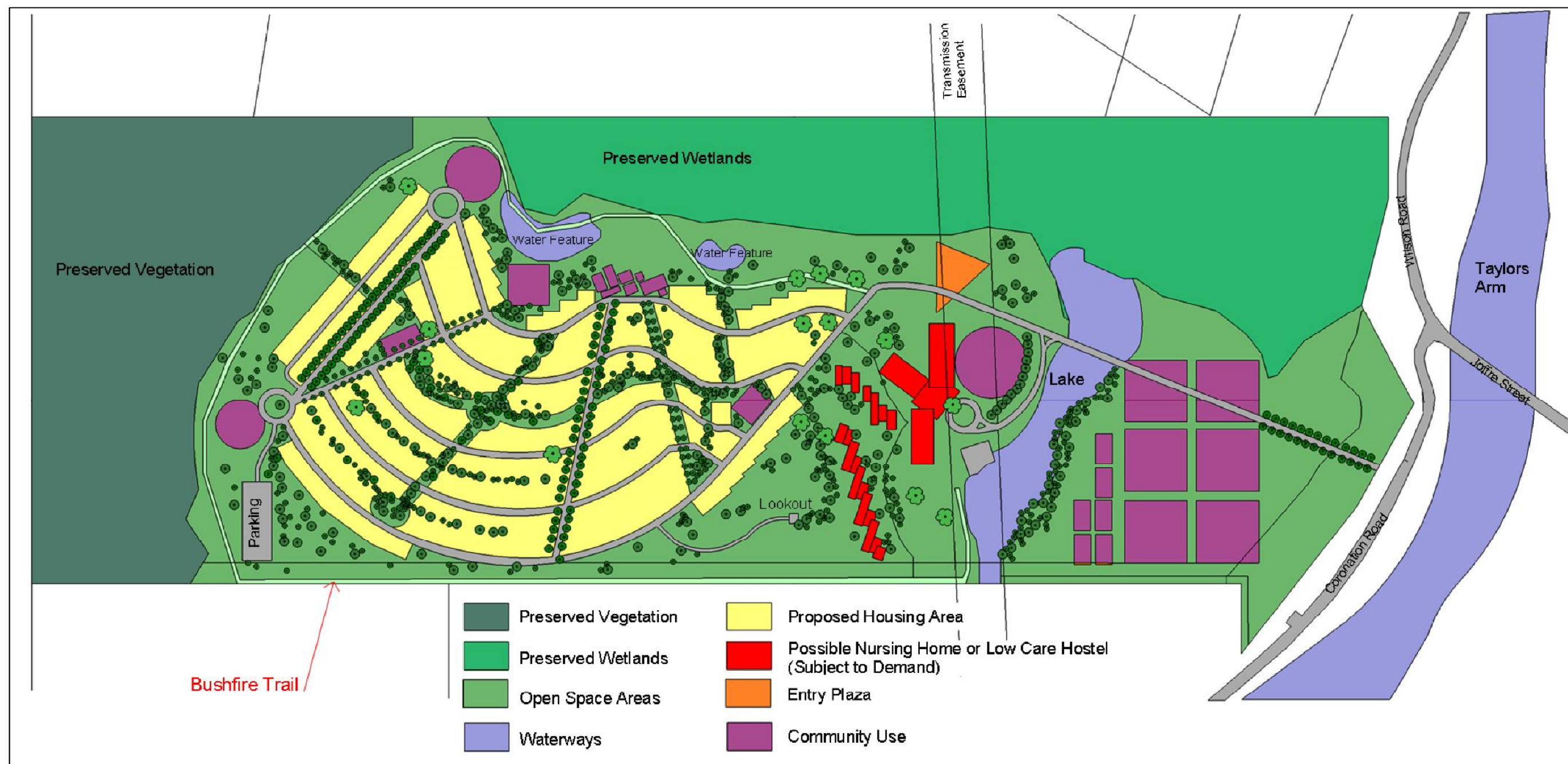
Master Plan Mapping

Figure 13 – Site Constraints Map



Source: Adapted from Campbell Luscombe Folk Lichtman Architects

Figure 14 – Master Plan



Source: Prepared by Hamptons Property Services (Adapted from Campbell Luscombe Folk Lichtman Architects)

Part 5: Community Consultation

It is considered that standard procedures would be implemented for the purpose of community consultation by the Council for the minimum required period of 28 days.

In the event that other forms of consultation are required, including with elected representatives, and possibly the broader community, the Proponent would be willing to pursue such processes as deemed appropriate in conjunction with both the Council and DP & I.