
REPORT OF GENERAL MANAGER

ORDINARY MEETING

TUESDAY, 16 AUGUST 2011

STRATEGIC PLANNING AND INFRASTRUCTURE

- 1. Draft Local Environmental Plan No. LP 130 - Badgee Rezoning Investigations, Sussex Inlet (Lucas Property Group) - Environmental Study and Planning Proposal File36689E (PDR)**
-

Purpose of the Report:

1. Provide an overview and details of the draft Environmental Study; and
2. Obtain Council direction on the adoption of the draft Environmental Study as the basis for forwarding a Planning Proposal to the Department of Planning and Infrastructure and to enable the matter to proceed to formal exhibition.

RECOMMENDATION

Recommended that Council adopt the draft Environmental Study as the basis for forwarding a Planning Proposal to the Department of Planning & Infrastructure, with the intent of progressing to public exhibition.

Community Strategic Plan:

Objective 1.5 Major town centres that are attractive, vibrant and popular destinations.

Strategy 1.5.3 Deliver and ensure high quality city planning and urban and landscape design outcomes for the City.

Delivery Program:

Activity 1.5.3.2 Implement appropriate land use zones and planning controls that reflect endorsed strategic plans/policies and are responsive to the community's needs.

Options and Implications:

Option 1

Adopt the draft Environmental Study as the basis for forwarding a Planning Proposal to Department of Planning and Infrastructure with the intent of progressing the rezoning proposal to public exhibition. This is the preferred option.

Implications

This option is consistent with the implementation of the Sussex Inlet Settlement Strategy and the South Coast Regional Strategy and will progress a long standing rezoning proposal that is supported by Council.

Option 2

Council not adopt the draft Environmental Study as a basis for preparing a Planning Proposal for submission to Department of Planning and Infrastructure.

Implications

This option will lead to the further delay of a long standing rezoning proposal.

Option 3

Defer consideration of this matter to enable Council to be briefed further or to enable the proponent to provide feedback.

Implications

This option will lead to the unnecessary delay of a long standing rezoning proposal, when the relevant information to allow a decision to be made on whether or not to proceed is contained in this report and the draft Environmental Study.

Report Details:

Introduction:

- # The draft Environmental Study covers an area of 235 hectares (owned by Lucas Property Group P/L) adjacent to the existing urban area of Sussex Inlet and the SEPP 14 wetland known as Badgee Lagoon - see **Attachment 'A'** - aerial photo.
- # The subject land comprises Lots 123, 124 & 125 DP 528699, Lot 5 DP 568283, Lots 144 & 145 DP 755937, Lot 156 DP 40207; Lot 2442 DP 1074478 and Lot 51 DP 1033684 (see **Attachment 'A'** - aerial photo and **Attachment 'B'** - existing zoning).

The land contains the existing Sussex Inlet Golf Course and a range of natural environments including forests and wetlands.

- # The subject land is identified in the endorsed Sussex Inlet Settlement Strategy (2007) as a residential investigation area (see **Attachment 'C'** - Sussex Inlet Settlement Strategy extract). The Settlement Strategy is supported by the South Coast Regional Strategy.

Background:

Council resolved on 25 September 2007 (MIN07.1457) to prepare a draft LEP to rezone various parcels of land in the vicinity of Badgee Lagoon at Sussex Inlet, owned by Lucas Property Group. The Council resolution is as follows:

- *Prepare an LEP over the subject land (being Lots 123, 124 & 125 DP 528699, Lot 5 DP 568283, Lots 144 & 145 DP 755937, Lot 156 DP 40207, Lot 2442 DP 1074478 and Lot 51 DP 1033684) that address the provisions of the Sussex Inlet Settlement Strategy.*
- *Seek clarification from the Department of Planning in relation to the concurrent operation in this case of Part 3 of the Environmental Planning & Assessment Act,*

1979 (EP&A Act) and the lodgement of a Part 3A Development Application with the Department.

As a result of the resolution, Council commenced a draft LEP process to rezone the subject land for proposed residential, tourist and golf course development. Concurrent with the rezoning process, a major project (Part 3A) application was lodged by the proponent with the then NSW Department of Planning.

It was agreed following discussion between Council, the proponent and the Department of Planning and Infrastructure, that it would be more resource-effective for the preparation of the rezoning to be based on the Environmental Assessment reports prepared by the proponent's consultants for the major project application, subject to these studies being peer reviewed by an independent consultant for technical correctness and adequacy, in part in relation to meeting Section 62 Consultation (rezoning) requirements. It was agreed that this review process would be funded by the proponent.

The proponent commissioned and undertook a series of consultant studies to inform the Environmental Study which would address the Director General Requirements (DGRs) for the Major Project as well as the planning issues raised during the Section 62 Consultation with government agencies as part of the rezoning process.

An independent consultant was commissioned in September 2009 to undertake the peer review of the Studies and provide recommendations on any additional information needed to adequately prepare an Environmental Study. The Peer Review was completed in February 2010 and as a result the proponent responded to the Peer Review with some additional information as recommended by the consultant. The final set of base studies were received in December 2010.

To continue on with the next phase of the LEP process, an independent consultant (Locale Consulting) was engaged to prepare the Environmental Study to inform the draft LEP, assisted by the major project/ Part 3A Environmental Assessment Studies and subsequent additional information from proponent and/ or other studies resulting from the Peer Review.

Key Issues:

- 1. The draft Environmental Study has now been completed and is submitted to Council for adoption (see Councillors Information Folder) to enable the matter to progress to the next stage.**

The draft Environmental Study has been prepared to determine the suitability of the site for a range of land uses, but not justify the proponent's development concept. It identifies that opportunities do exist for urban development within the site and as an extension of the existing Sussex Inlet urban area, factoring in environmental, economic and social constraints.

The draft Study identifies sensitive environmental areas that should be retained and enhanced through appropriate zoning and protection measures. It also suggests the remaining development footprint should be integrated into the existing urban areas,

providing current and future residents and businesses the opportunity to build a cohesive and well serviced community.

Based on the site's susceptibility to flood events, the draft Study reflects recommendations contained in the Sussex Inlet Settlement Strategy, the State Emergency Service and Planning Focus Meeting outcomes. Therefore, the need for a flood free access road from the existing Badgee area through to Sussex Inlet Road is a key element to be addressed in the Planning Proposal.

Further actions are also required to ensure that the site can continue to progress towards final development such as, but not limited to, a full water balance analysis to demonstrate sewage treatment considerations, adequate provision of other servicing infrastructure and additional public consultation. These steps will ultimately provide the detail and assurances required to implement the project in a sustainable and effective way.

The draft Environmental Study is supported by an 'Information Review and Ecological Advice' prepared by Alison Hunt & Associates Pty Ltd - see **Attachment 'D'**. Alison Hunt and Associates Pty Ltd reviewed the background documents and report, interpreted relevant data and considered the suitability and capacity for development of the subject land, given the conservation significance and distribution of ecological attributes. The draft Environmental Study included 3 areas, identified by the Office of Environment and Heritage as being unlikely to provide development opportunities without impacts on matters of high conservation significance. Alison Hunt & Associates Pty Ltd found that Areas 1 & 2 should be conserved, and provided reasons contained in **Attachment 'C'**, and that Area 3 (most westerly section) may be able to support some development without loss of conservation integrity of the site due to a lower number of threatened species records and movement corridors being currently disrupted by adjacent rural residential lots.

The key recommendations of the draft Environmental Study are that:

- Three precincts within the site are capable of development, generating 620 - 744 additional dwellings, and the central precinct to be zoned for conservation;
- The site be identified on the Urban Release Area map overlay as part of a Standard Instrument LEP;
- A Development Control Plan be prepared for the site, in accordance with requirements of an Urban Release area, to guide future development in terms of its detailed urban design and planning requirements;
- Zones used provide an appropriate level of flexibility to achieve the planning intent as discussed through the precinct planning and land use concept plan and the constraints and opportunities presented by the site;
- Further detailed investigations be undertaken in consultation with Council, the Office of Environment and Heritage, and the NSW Office of Water in relation to:
 - o The identification of the watercourse order and any recommended core riparian zone requirements for waterways through the south-western portion of the site; and
 - o The filling of land within the 1% flood area, and in areas with direct run-off to Badgee Lagoon, given the Section 117 directions with respect to flood liable land, and potential for environmental impact on the Lagoon.

-
- Detailed investigations be undertaken with respect to the local community centre/main street area to ensure an appropriate balance between alternative land uses, economic development and compatibility with the existing Sussex Inlet commercial area;
 - Open space connections be provided to adjoining natural areas to provide a connection and relationship between the urban areas and the surrounding natural environment;
 - The SEPP 14 wetland boundaries be confirmed and mapped in detail to guide the boundary of zones where applicable;
 - Sensitive natural areas be protected by appropriate buffer areas, to be included in environmental conservation zones, at distances of 50m around EEC's and 100m around SEPP 14 wetlands as required by the Office of Environment and Heritage;
 - Water quality treatment devices, including Water Sensitive Urban Design and detention basins, be provided as part of integrated open space areas and in accordance with the principles of Neutral or Beneficial Effect on sensitive receiving waters;
 - A Conservation Management Plan be prepared for all land to be included in conservation zones, as well as an Open Space Management Plan designed to ensure the integration of all publicly accessible open space areas; and
 - In accordance with the Department of Planning & Infrastructure's Section 54 response, Council liaises with the Department to ensure that regional infrastructure can be adequately provided for through the draft LEP.

The "Concept Land Use Plan" that forms part of the draft Environmental Study is provided as **Attachment 'E'**.

The draft Environmental Study was circulated to relevant Council staff and the following comments have been provided:

Natural Resources & Floodplain Unit

- There may be a potential need to significantly upgrade or create fire fighting infrastructure - this is not addressed in the draft Environmental Study.
- Nominating a buffer width for EEC's and SEPP 14 wetlands at this stage needs further consideration. Given climate change consideration, there could be a need to increase the buffers to the EEC and SEPP 14. Consideration needs to be given to whether the draft Environmental Study recommends appropriate buffers of minimal width of 50 m and 100 m respectively for EEC and SEPP 14, with the final buffer width to be determined following detailed assessment.
- The recommendation for detailed flood assessment is supported.

Comments:

The above feedback on the draft Environmental Study is considered to be relevant and the feedback could form the basis for a submission from the Natural Resources & Floodplain Unit when a 'gateway' determination is made and the Planning Proposal progresses to exhibition.

Traffic & Transport Unit

- The traffic information requires additional analysis and reporting in accordance with AUSTROADS and RTA guidelines along with a comprehensive appraisal of the potential impacts of any possible future development. The traffic assessment would benefit from a more comprehensive impact assessment, such as seasonal factoring, 10-year background growth scenarios, impacts on the broader road network and town centre, public transport requirements such as routes and facilities, and traffic generation figures based on land-use, flood free access and evacuation plan and road widths.
- Due to the large nature of development proposals in this area it would be advisable to consider a Structure Plan for Sussex Inlet to ensure that demands for infrastructure and community facilities in Sussex Inlet can be more accurately determined. This rezoning proposal should not be considered in isolation.
- Section 6.2 Noise - The Traffic Noise Intrusion Report indicates that period of assessment was during average daily conditions. Would recommend that any subsequent noise analysis be based on 120th Highest Hour conditions, and also takes background growth into consideration
- Section 6.10 Roads and Access - The Transport Report is based on average conditions which makes the traffic report inadequate. Any subsequent analysis should be based on both average conditions and 120th Highest equivalent annual hour conditions, and include background growth.

Comments:

It is noted that this rezoning proposal is consistent with the Sussex Inlet Settlement Strategy that has been endorsed as the long term strategic planning strategy for the Sussex Inlet area. Other than the 2nd dot point that relates to the Strategy, the above feedback on the draft Environmental Study is considered to be relevant and the feedback could form the basis for a submission from the Traffic & Transport Unit when a 'gateway' determination is made and the Planning Proposal progresses to exhibition, as some of the additional, more detailed, traffic assessment comments can be addressed at a later stage in the rezoning/ future development process.

Shoalhaven Water

Shoalhaven Water support the content and findings of the draft Environmental Study, specifically the requirement for a full water balance analysis to demonstrate sewage treatment considerations.

Comments:

The Study identifies that the current Sussex Inlet Sewerage Scheme does not extend to the subject site and a possible key limiting factor to the rezoning of the land is the capacity of the Sewerage Treatment Plant (STP) and the potential for expansion of the STP and effluent disposal.

Although a review of Shoalhaven Water's Development Servicing Plan (2005) and upgrade of the STP is scheduled for completion by the end of June 2012, there is no guarantee the expansion capability will enable rezoning of the land to be serviced by the STP. Thus, an alternative on-site treatment option will be required to accommodate all of the land proposed to be rezoned.

No water supply network currently exists on the site. Given the potential site development may exceed assumption used in calculating Shoalhaven Water's DSP for Water Supply Services (2005), it is recognised that the water supply infrastructure that is proposed to be installed by Shoalhaven Water to service the area may be inadequate.

Negotiation between the developer and Shoalhaven Water to ensure adequate water supply infrastructure through review of the DSP for Water Supply Services (2005) will need to take place.

2. The “old system” LEP making process was repealed in 2008 and replaced with a new process, known as the ‘gateway process’ for making LEP’s.

Under the new system Council must prepare a "planning proposal" which explains the intended effect of the new LEP and the justification for it, including any relevant maps showing the intended rezoning, and the details of how the authority proposes to carry out community consultation. The Minister then makes a "gateway determination" as to whether the planning proposal should proceed to the next stage (with or without variation).

In making a gateway determination, the Planning Minister can decide the following things:

- Whether the planning proposal should proceed;
- Whether the planning proposal should be resubmitted;
- What community consultation is required, if any;
- Whether any consultation is required with State or Commonwealth public authorities;
- Whether a public hearing must be held into the planning proposal by the Planning Assessment Commission or other body; and
- The timeframe for completing the process.

To progress this draft LEP, under the new “gateway” system, the draft Environmental Study if adopted for Badgee Lagoon will form the basis for a Planning Proposal to be submitted to the Department of Planning and Infrastructure. Should the Department support the Planning Proposal and provide a favourable “gateway” determination then this will enable it to proceed to exhibition.

3. The Environmental Planning and Assessment Amendment (Part 3A Repeal) Act 2011 changed how state significant development is now handled.

The changes have enabled decision making to a greater extent to be returned to Councils and Joint Regional Planning Panels (JRPP) in many circumstances. This means residential, commercial and retail projects with a capital investment greater than \$100 million is no longer identified as a class of development to which Part 3A applied and development applications (DAs) now need to be lodged with Council under Part 4 of the EP&A Act.

At this stage, the Department of Planning & Infrastructure has advised that further advice on the status of the Badgee 3A application (MP07_1026) that relates to the subject land

is imminent. When the rezoning of the subject land proceeds, should a new development application be lodged it would most likely be assessed by Council or the JRPP as the consent authority. It is also noted, a concept plan formed part of the basis for the Part 3A application. The findings of the draft Environmental Study do not support that specific concept plan prepared by the proponents as a development option for the subject land.

Resourcing Implications - Financial, Assets, Workforce:

The proponent has provided funding for the preparation of the Environmental Study for this project.

There are however, ongoing staffing resources involved with the project such as liaising with the proponent and consultant and the intended preparation of the planning proposal.

Future resourcing implications are difficult to ascertain due to the uncertainty of timing and negotiations with Department of Planning and Infrastructure during the Gateway/ Planning Proposal process, and the other major projects such as the draft Citywide LEP and DCP that strategy planning staff are currently working on.

Community, Environment (ESD), Economic and Governance Impact:

The range of Community, ESD, Economic and Governance impacts are identified and considered in the Environmental Study.

Conclusion:

The Badgee LEP is a longstanding rezoning project. The subject land is identified in the endorsed Sussex Inlet Settlement Strategy (2007) as a residential investigation area, which is supported by the endorsed South Coast Regional Strategy.

The draft Environmental Study has now been completed for the Badgee expansion area.

To now progress this draft LEP, under the new 'gateway' system, the Environmental Study if adopted needs to form the basis for a Planning Proposal to be submitted to the Department of Planning and Infrastructure. Should the Department provide a favourable "gateway" determination then this will enable the matter to proceed to exhibition.




 Subject Land -
 LP130
 Lots 123, 124 & 125
 DP 528699
 Lot 5
 DP 568283
 Lots 144 & 145
 DP 755937
 Lot 156
 DP 40207
 Lot 2442
 DP 1074478
 Lot 51
 DP 1033684

Locality : Sussex Inlet
 Parish : Farnham
 Scale: 15,000

All dimensions are in metres

Strategic Planning
 Planner : S. Cooper
 Drawn by : S. Gray
 Date : 4th October, 2007
 Cad File : Dlep130/Working
 Maps/AerialPhoto



Attachment 2
EXISTING ZONING

Shoalhaven LEP 1985
As Amended



Subject Land -
LP130
Lots 123, 124 & 125
DP 528699
Lot 5
DP 568283
Lots 144 & 145
DP 755937
Lot 156
DP 40207
Lot 2442
DP 1074478
Lot 51
DP 1033684

Locality · Sussex Inlet

Parish · Farnham

Scale: NTS

All dimensions are in metres



3.1.4 Badgee Investigation Area

There are two large land holdings located to the west of the existing Badgee residential area and north of Sussex Inlet Road. These holdings have common characteristics in many regards and are shown edged in green on Figure 22. One of these holdings incorporates the existing nine-hole Sussex Inlet golf course as well as land already zoned residential under Shoalhaven LEP 1985 on the western fringe of the existing Badgee residential development north of the River Road bridge.

It has been proposed that part of these sites be developed for mixed residential purposes, a range of community facilities and the expansion of the golf course to 18 holes.

The potential social/economic benefits arising from the development of this land would include:

- provision of additional housing stock in a flood free location adjacent to the existing urban area of Sussex Inlet with associated efficiencies relating to infrastructure provision and staging of development;
- the ability to co-ordinate planning and environmental management (including water quality) across two large sites under one Local Environmental Study and rezoning process;
- a long term increase in population for Sussex Inlet with associated benefits in terms of increased viability for local services and facilities as well as the provision of new facilities;
- sufficient land to provide for an extension of the existing golf course from nine to eighteen holes;
- provision of a flood free road access from the existing residential area to the north of Badgee Lagoon through to Sussex Inlet Road (also discussed in Section 2.2.3); and
- provision of a range of different housing types within the two sites as part of efforts to increase the diversity of housing stock in the study area.

Potential environmental offsets/mitigation measures include:

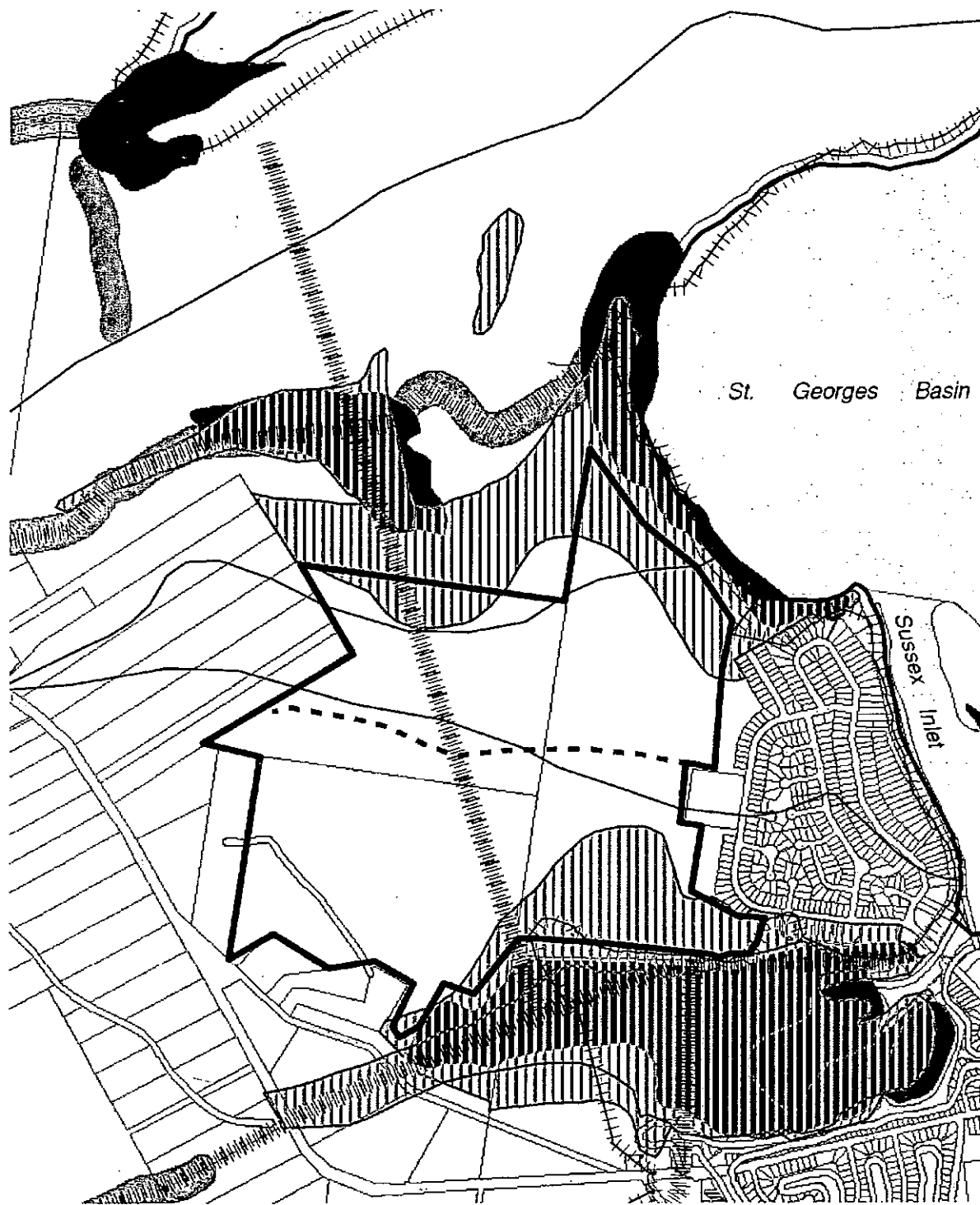
- Subject to further detailed assessment the opportunity to incorporate the habitat corridors through the site in a north-south direction. This includes the opportunity to link Badgee riparian areas to the south of Sussex Inlet Road to the bushland fronting St Georges Basin;
- dedication of Badgee Lagoon (with appropriate buffer) to the community at no cost, thereby protecting the SEPP 14 wetland and rezoning this land to an appropriate environment protection zone;
- public dedication of St Georges Basin foreshore;

As indicated, development of these sites should involve:

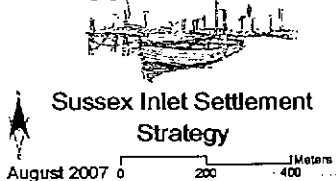
- preparation of a joint Local Environmental Study and rezoning process to ensure maximum integration of planning and environmental outcomes across property ownership;
- provision of flood free road access to Sussex Inlet Road;
- detailed investigations and controls addressing water quality management issues;
- further detailed flora and fauna analysis to establish the appropriate location, width and linkages of the potential habitat corridors, including through the proposed expansion of the golf course.



Figure 22: Badgee Investigation Area – Constraints and Opportunities



Badgee Investigation Area Constraints and Opportunities



Legend

- | | |
|--------------------------------|----------------------------|
| Study Area | Swamp Sclerophyll Forest |
| Badgee Investigation Area | Sepp14 Wetlands |
| Sub - Catchment Boundaries | Category 1 Riparian Buffer |
| Flood Free Access Road | Category 3 Riparian Buffer |
| Potential Wildlife Connections | 1:100 year Floodline |

SUSSEX INLET SETTLEMENT STRATEGY • August 2007
File: 30152

The environmental study is necessary given the nature of the subject land and the need to consider in detail issues such as flora and fauna, water quality and bushfire hazard protection. The environmental study over this land will need to consider its potential high conservation value (defined by the South Coast Regional Strategy). These lots have been mapped by the State as having a combination of threatened flora and fauna habitat, old growth forest, endangered ecological communities and SEPP 14 wetlands. Thus the investigations will need to verify the environmental values of the site.

Given that there are currently only two landowners in this area, substantial potential exists for Council to investigate entering into a planning agreement relating to the delivery of a range of outcomes described above. This agreement could be prepared using the relevant provisions of the *Environmental Planning and Assessment Act 1979*.

Badgee Investigation Area

Actions

1. Provide for the expansion of the Sussex Inlet urban area through the investigation and potential rezoning of this area. The need to provide a mix of residential, community and recreational uses will be considered as part of the investigations.
2. A coordinated and integrated environmental study will be undertaken and controls investigated to support any rezoning proposal, addressing, as a minimum:
 - Land capability and environmental values (SEPP 14 wetlands, Endangered Ecological Communities etc)
 - Locally significant riparian and habitat corridors
 - Aboriginal Cultural heritage
 - Visual impact
 - Bushfire risk and management
 - Water quality including stormwater and soil and water management
 - Traffic impact
 - Required social and community infrastructure
 - Infrastructure servicing
 - Staging of development
3. Should rezoning proceed then an implementation plan (possibly including a Section 94 Plan) will be prepared as part of any draft LEP. The implementation plan will need to address the provision of required infrastructure, any outcomes required to support development and include an appropriate staging plan.
4. The recommendations of the South Coast Sensitive Urban Lands Review must be addressed as part of any subsequent development of this area.
5. Consideration shall be given to incorporating a small neighbourhood shopping centre as part of the overall development of the Badgee Investigation Area given the flooding issues that impact on the existing business area of Sussex Inlet.

Responsibility

Council, Department of Planning in associated with proponents/landowners and other relevant State government Agencies.

Timeframe

Short term



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3 August 2011

Mr S Thompson
Locale Consulting Pty Ltd
33 River Road
Shoalhaven Heads NSW 2535

Dear Steve

**Badgee Lagoon Project
Information Review and Ecological Advice**

1.0 Introduction

Locale Consulting Pty Ltd, on behalf of Shoalhaven City Council (Council), has prepared a Local Environment Study (LES) for the Badgee Lagoon Project. Alison Hunt & Associates Pty Ltd (AH Ecology) was commissioned by Locale Consulting Pty Ltd to provide ecological review and advice in regards to development of the LES for the Badgee Lagoon Project. The brief included review of background information and reports, interpretation of data and consideration of the suitability and capacity for development of the Project area given the conservation significance and distribution of ecological attributes.

2.0 Badgee Lagoon Project

The land associated with the Badgee Lagoon Project occupies a total of 235.9 hectares and is located approximately 3 hours south of Sydney on the South Coast of NSW. The Project area lies adjacent to Badgee Lagoon and to the north-west of the Sussex Inlet urban area, and includes the Sussex Inlet Golf Course. The site supports substantial ecological resources including strong connectivity to the vegetated areas to the north, hollow-bearing trees, eight vegetation communities, three Endangered Ecological Communities, and two flora species and 16 fauna species listed under the NSW *Threatened Species Conservation Act 1995*.

Some areas of proposed development could readily be supported. However, three areas (Areas 1, 2 and 3) were identified by Council and the Office of Environment & Heritage as being unlikely to provide development opportunities without impacts on matters of high conservation significance.

3.0 Background Information Reviewed

The following reports were reviewed:

- a) *Whelans Insites Development Consultants, The Sussex Inlet Golf Course Re-development. Badgee Lagoon, Sussex Inlet. Rezoning for Residential Development and Golf Course. Ecological Issues & Constraints Report. Including Appendices A - L and Figures 1 – 16. Dated 25 February 2011*
- b) *Eco Logical Australia, Supplementary fauna and habitat surveys. Badgee Lagoon, Sussex Inlet. Dated 19 November 2010.*

4.0 Outcome of Review

Area 1

- This area should be conserved for the following reasons:
 - Would allow the northern boundary of the Project areas with St Georges Basin to be strengthened;
 - *Pterostylis ventricosa* should not be managed as a part of a golf course but instead should be protected within intact habitat; and
 - High incidence of microbats within, or near to an area of high density of hollow-bearing trees may indicate the presence of microchiropteran roost sites.

Area 2

- This area should be conserved for the following reasons:
 - The area supports a high density of hollow-bearing trees;
 - The area supports a high density of threatened species records; and
 - Would provide a strengthened movement corridor to the north / north-west.

Area 3 (most westerly section)

- This area may be able to support some development without loss of conservation integrity for the site for the following reasons:
 - There are fewer threatened species records; and
 - Movement corridors are currently disrupted by adjacent rural residential blocks.

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Endangered Ecological Communities

In addition, it is noted that all Endangered Ecological Communities should be protected by buffers.

These issues were discussed with Locale Consulting Pty Ltd for consideration during preparation of the LES. AH Ecology has reviewed the ecological components of the LES and note that these matters have been accurately integrated into the LES.

Yours faithfully
Alison Hunt & Associates Pty Ltd



Dr Alison Hunt
Director

9.8 Land Use Plans

Based on the above precinct concept planning, Figure 24 identifies the envisaged concept land use plan that could be used to provide direction to a DCP or masterplan for the site. These indicative land uses do not constitute fixed zones, and a broad based residential zone, such as the *R1 – General Residential* zone, would be recommended as a blanket zone across the site to enable an appropriate level of flexibility for the site into the future.

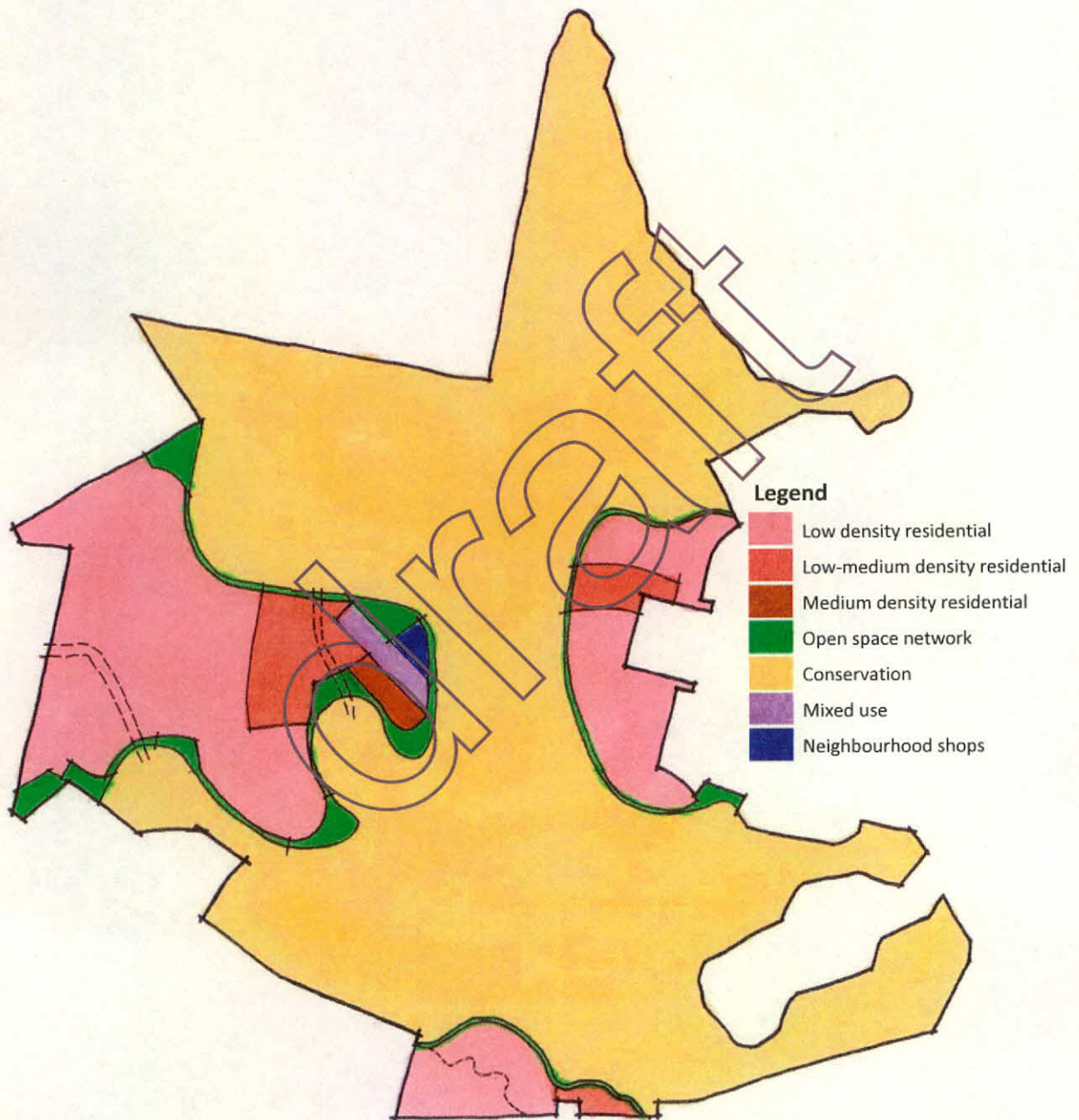


Figure 24: Concept Land Use Plan