

Planning and Assessment

IRF20/5491

Gateway determination report

LGA	Maitland
PPA	Maitland City Council
NAME	Hydro (Gillieston Heights) – Western Precinct (400 homes)
NUMBER	PP_2020_MAITL_002_00
LEP TO BE AMENDED	<i>Maitland Local Environmental Plan 2011</i>
ADDRESS	Cessnock Road, Gillieston Heights
DESCRIPTION	Lots 1, 2, 5 and 8 DP456946, part of lots 3, 4, 7, 9, 10 and 11 DP 456946 that are east of South Maitland Railway, and lots 54, 69, 70, 71 and part of lot 55 DP975994
RECEIVED	27 November 2020
FILE NO.	IRF20/5491
POLITICAL DONATIONS	There are no donations or gifts to disclose and a political donation disclosure is not required
LOBBYIST CODE OF CONDUCT	There have been no meetings or communications with registered lobbyists with respect to this proposal

1. INTRODUCTION

1.1 Site description

The site includes surplus land holdings of the former Hydro Aluminium Smelter east of the South Maitland Railway and west of Cessnock Road, covering approximately 70 hectares. The site contains some existing vegetation generally following the gully lines of the site.



Figure 1: Subject site

1.2 Existing planning controls

The site is zoned RU2 Rural Landscape with a minimum lot size of 40ha (Figure 2a and 2b). The land has no building height controls.

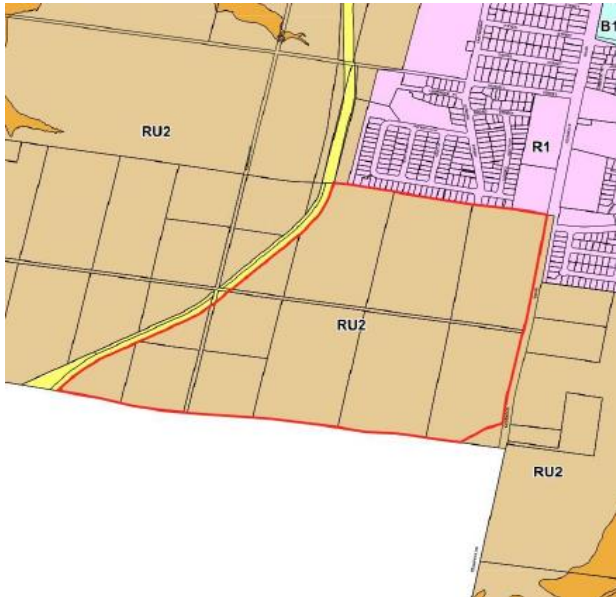


Figure 2a: Existing zones

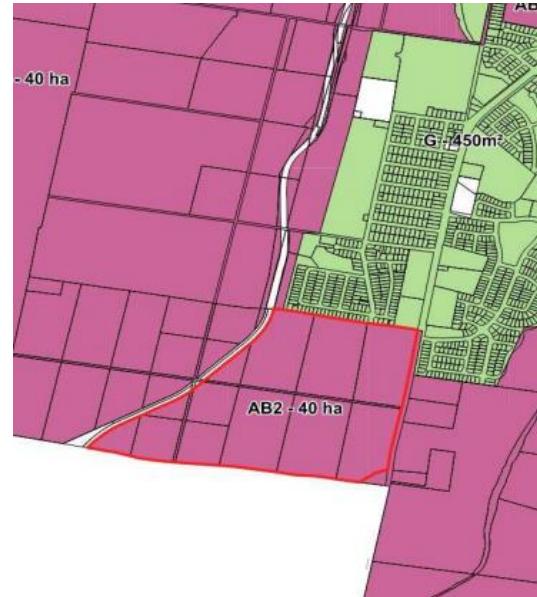


Figure 2b: Existing minimum lot size

1.3 Surrounding area

The site adjoins residential land to the north in the Gillieston Heights urban release area with has a mix of vacant residential land and newly established homes. The site has easy access to both Kurri Kurri (local centre) and Maitland (regional Centre).

West of the South Maitland Railway line is rural lands, including wetland areas which may have biodiversity significance.

To the east of the site fronting Cessnock Road is another planning proposal (PP_2020_MAITL_001_00) that will also extend the urban area of Gillieston Heights further south. This proposal is being considered separately.

South of the site in the Cessnock local government area is a separate planning proposal for the remainder of the Hydro Aluminium Smelter and buffer lands, which proposes to continue the residential zone further south towards the existing urban areas of Cliftleigh and Heddon Greta.

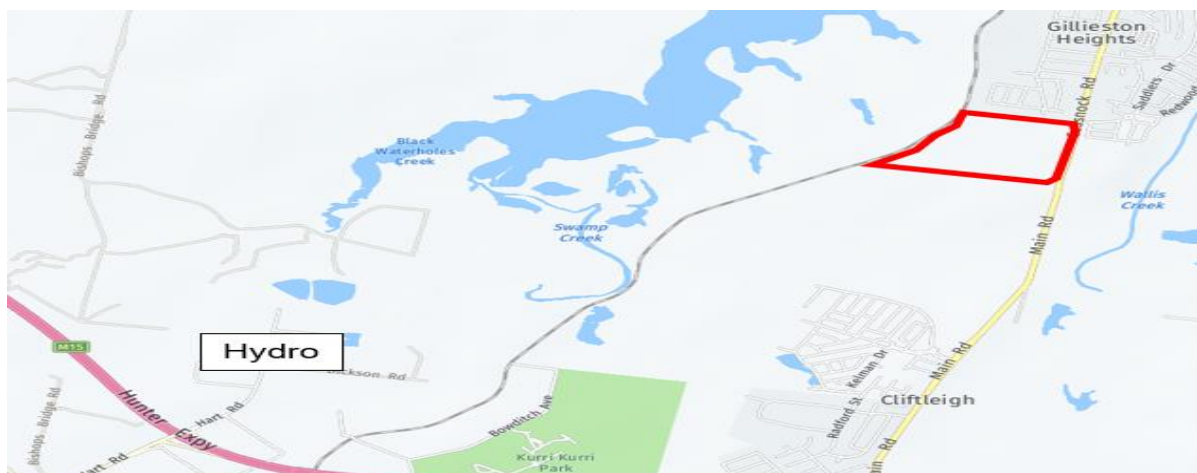


Figure 3: Local context

2. PROPOSAL

2.1 Description of planning proposal

The planning proposal (**Attachment A1**) seeks to rezone the former Hydro Aluminium Smelter and buffer lands east of the South Maitland Railway to permit residential development.

On 23 March 2016, the delegate of the Minister for Planning issued a Gateway determination (PP_2016_MAITL_001_00) for a planning proposal for the site. Since this time, there has been agency consultation and further analysis undertaken. However, the planning proposal has not yet progressed to public exhibition.

The Gateway determination was subject to conditions, and an assessment of the conditions is included in Table 1 to identify any unresolved issues that need to be considered as part of this planning proposal.

Table 1: Gateway determination conditions

Gateway Condition	Topic	DPIE assessment against conditions
1(a)	Flooding	Resolved - The Wallis and Fishery's Creek Flood Study has been completed and has confirmed the flood levels to determine the proposed zone boundaries.
1(b)	Flood Free Access Strategy	Resolved - A flood free access strategy has been completed. It will be incorporated as part of the development control plan for the site.
1(c)	SEPP 55 (Section 9.1 Direction 2.6)	Superseded – Matters of contamination now assessed under section 9.1 Ministerial Direction 2.6 Remediation of Contaminated Land.
1(d)	Agricultural lands study	Completed – An agricultural lands study has been completed, and the planning proposal updated to reflect assessment against section 9.1 Ministerial directions.
1(e)	Lower Hunter Regional Plan	Superseded - The <i>Lower Hunter Regional Plan 2006</i> has been superseded and the new planning proposal has been updated to comply with the <i>Hunter Regional Plan 2036</i> and <i>Greater Newcastle Metropolitan Plan 2036</i> .
1(f)	Heritage	Partly Resolved - European heritage to be included in the development control plan. Impacts to South Maitland Railway heritage item considered acceptable, provided a heritage interpretation strategy is prepared as part of the development control plan for the site. Aboriginal Cultural Heritage investigations have been completed. Updating these studies and further consultation is required and is appropriate to be resolved prior to finalisation.
1(g)	Noise and Vibration	Partially Resolved - The planning proposal states Council has requested a revised noise and vibration impact assessment based on the amended subdivision masterplan and most up-to-date traffic data being prepared by Transport for NSW.

Gateway Condition	Topic	DPIE assessment against conditions
		The proposed zones have been confirmed and the development control plan for the site will manage impacts at the development application stage.
1(h)	Eastern land	Partly resolved - Further studies have been undertaken, noting the Aboriginal cultural heritage analysis methodology was incomplete.
1(i)	Traffic - Cessnock Road	Partly Resolved - Transport for NSW (TfNSW) is drafting a Main Road 195 corridor strategy that considers traffic modelling and capacity analysis to address the requirements of this condition.
1(j)	Amend PP statements regarding traffic	Resolved – planning proposal updated.
1(k)	Confirm zone boundaries	Resolved –Zone boundaries have been confirmed.

Maitland City Council undertook consultation as part of the 2016 planning proposal in February 2020. This included consultation with the following public authorities:

Table 2: Responses from consultation on 2016 planning proposal

AGENCY	RESPONSE
Biodiversity Conservation Division	Advised it will not provide comment on the planning proposal until the biodiversity conservation assessment report is submitted to the agency.
Department of Industry (Resources and Geosciences)	No objection raised. The agency advised it will need to directly liaise with the Biodiversity Conservation Trust in respect to any potential matters with any biodiversity stewardship.
Department of Primary Industries	No issues or concerns raised.
State Emergency Services	No response provided.
NSW Rural Fire Service	A revised bushfire report prepared in accordance with the <i>Planning for Bushfire Protection 2019</i> is required. Advised on emphasis should be placed on deficiencies around access and egress identified in the Kleinfelder report and assessment undertaken in conjunction with traffic impact assessment.
Transport for NSW	The agency advised a Main Road 195 corridor strategy is progress. Of particular note is the location and nature of a future intersection with Main Road 195 providing access to the proposed development. Prior to finalisation of the planning proposal, the Main Road 195 corridor strategy will need to be completed for

AGENCY	RESPONSE
	the agency to understand the traffic and transport implications.
Mindaribba Local Aboriginal Land Council	<p>No response provided to Maitland City Council.</p> <p>The Local Aboriginal Land Council did provide a response to the Cessnock City Council on its planning proposal.</p> <p>Advised a number of lots under current claim were proposed to be rezoned to E2 Environmental Conservation. The Local Aboriginal Land Council advised this was not supported for lands under claim.</p> <p>Also advised it is necessary to undertake a revised and more rigorous Aboriginal cultural heritage assessment that include assessment of areas of Black Waterholes, Black Creek and Swamp Creek.</p> <p>The Local Aboriginal Land Council advised it would like to be consulted during the preparation and finalisation of and biodiversity conservation assessment report.</p>
Subsidence Advisory NSW	<p>Part of the site is in a mine subsidence district.</p> <p>The agency advised there are mine entries near the western boundaries of mine workings. If un-remediated, the entries represent a high risk of mine subsidence, including sinkhole formation.</p>
Hunter Water Corporation	No response provided.

The Department consulted with Council regarding issuing a new Gateway determination for the planning proposal and discontinuing the 2016 planning proposal, taking into consideration the work that has been completed to address the original Gateway conditions. Council agreed to the approach.

2.2 Objectives or intended outcomes

The objectives of the proposal are to:

- Identify a new urban release area to encompass the subject site;
- rezone the site for residential purposes;
- to protect and manage areas of environmental constraints and values; and
- Ensure that future residents have access to adequate local and regional infrastructure.

These objectives are clear and do not require updating.

2.3 Explanation of provisions

The planning proposal outlines the proposed changes to the *Maitland Local Environmental Plan 2011* and they are clear and adequate for community consultation.

In summary the proposal seeks to:

- zone part of the site from RU2 Rural Landscape to R1 General Residential (Figure 4a); and
- amend the minimum lot size (450m²) to reflect the zone boundary (Figure 4b); and
- map as an urban release area.

It is proposed to retain part of the existing RU2 Rural Landscape zone that is subject to potential environmental constraints, including mine subsidence, endangered ecological communities and threatened species.

The planning proposal also includes an explanation of the actions Council intends for its development control plan and local 7.11 infrastructure contributions plan.



Figure 4a: Proposed zoning



Figure 4b: Proposed Minimum lot size

2.4 Mapping

The planning proposal includes maps that show the current and proposed controls that are suitable for community consultation.

The proposal includes amendments to the following local environmental plan maps:

- Land Use Zoning;
- Lot Size; and
- Urban Release Area.

3. NEED FOR THE PLANNING PROPOSAL

The Hydro owned land forms part of the wider land holding of the Hydro Aluminium Smelter and buffer lands. The smelter ceased operation in 2012. As part of the closure, the landowner commenced a range of planning studies to determine the land use capability of the site. The northern extent of the Hydro site is situated in the Maitland local government area and is subject to this planning proposal. The remainder of the site is located in the Cessnock local government area and is subject to a separate planning proposal.

The site in the Maitland local government area was identified in the *Maitland Urban Settlement Strategy 2012* as being suitable for consideration for urban purposes.

The 2016 Gateway determination agreed to the need for the planning proposal. The planning proposal is consistent with regional and local planning strategies including the *Hunter Regional Plan 2036*, *Greater Newcastle Metropolitan Plan 2036* and the *Maitland Local Strategic Planning Statement* (LSPS).

4. STRATEGIC ASSESSMENT

4.1 Regional

Hunter Regional Plan 2036

The planning proposal is consistent with the *Hunter Regional Plan 2036*.

The planning proposal is consistent with the following actions:

Action	Description	Consistency
14.1	Identify terrestrial and aquatic biodiversity values and protect areas of high environmental value	Yes
16.1	Manage the risks of climate change and improve the region's resilience to hazards	Yes
16.2	Review and consistently update floodplain risk and coastal zone management plans	Yes
18.1	Facilitate more recreational walking and cycling paths	Yes
18.2	Deliver connected biodiversity-rich corridors and open space areas for community enjoyment	Yes
21.2	Focus development to create compact settlements in locations with established services and infrastructure, including the Maitland Corridor growth area	Yes
21.4	Create a well-planned, functional and compact settlement pattern that responds to settlement planning principles and does not encroach on sensitive land uses	Yes
21.6	Provide greater housing choice	Yes
21.7	Promote new housing opportunities in urban areas to maximise the use of existing infrastructure	Yes
26.1	Align land use and infrastructure planning to maximise the use and capacity of existing infrastructure and the efficiency of new infrastructure	Yes
26.4	Coordinate the delivery of infrastructure to support the timely and efficient release of land for development	Yes
26.5	Ensure growth is serviced by enabling and supporting infrastructure.	Yes

Greater Newcastle Metropolitan Plan

The *Greater Newcastle Metropolitan Plan 2036* sets out strategies and actions that will drive sustainable growth across Greater Newcastle, which includes Cessnock City, Lake Macquarie City, Maitland City, Newcastle City and Port Stephens Council's.

The site is identified in the *Greater Newcastle Metropolitan Plan 2036* as a housing release area, adjacent to the existing Gillieston Heights Urban Release Area.

The planning proposal is consistent with the following strategies:

Strategy	Description	Consistency
11	Create more great public spaces where people come together	Yes
12	Enhance the Blue and Green Grid and the urban tree canopy	Yes
14	Improve resilience to natural hazards.	Yes
20	Integrate land use and transport planning	Yes
23	Protect major freight corridors	Yes

The planning proposal aligns with Cessnock City Council's LSPS and master planning across the local government area boundary.

4.2 Local Community Strategic Plan

The planning proposal is consistent with the Community Strategic Plan having regard to the key themes of:

- Proud people, great lifestyle – sense of place, local services;
- Our built space – planned, timely and integrated infrastructure, safety and accessibility and affordable housing;
- Our natural environment – managing impacts on the environment, natural resources and flood risks; and
- A prosperous and vibrant city – local character.

Maitland Local Strategic Planning Statement (LSPS)

Council acknowledge the planning proposal is the best way achieve the outcomes as proposed in the Local Strategic Planning Statement. The planning proposal is consistent with the Local Strategic Planning Statement.

Maitland Urban Settlement Strategy 2012 (MUSS)

The site is identified in the MUSS for urban expansion consistent with the sequencing and release of urban land for the Gillieston Heights locality. The site forms part of the remaining developable land in the Gillieston Heights locality.



Figure 5: Extract from Maitland Urban Settlement Strategy

4.3 State environmental planning policies (SEPPs)

The planning proposal assesses the consistency with the applicable state environmental planning policies.

State Environmental Planning Policy (Koala Habitat Protection) 2019

As koalas are identified as a threatened species under the *Biodiversity Conservation Act 2016*, the parallel assessment of the Biodiversity Conservation Assessment Report (BCAR) will consider impacts on biodiversity values.

State Environmental Planning Policy (Primary Production and Rural Development) 2019

The planning proposal states a site assessment has identified there is no State significant agricultural land and only a small part of the site could be considered suitable for agriculture. This is consistent with the statement in the 2016 planning proposal.

4.4 Section 9.1 Ministerial Directions

Council provides a comprehensive assessment against the applicable section 9.1 Ministerial directions. The following assessment includes directions where the planning proposal justifies its potential inconsistency or is inconsistent.

Directions 1.2 Rural Zones and 1.5 Rural Lands

The planning proposal is inconsistent with these directions.

However, the inconsistency is justified as the site is identified in the *Greater Newcastle Metropolitan Plan 2036* and *Hunter Regional Plan 2036*.

Appendix A states that a planning proposal may be inconsistent with the terms of certain Ministerial directions if it is in accordance with the actions of the *Greater Newcastle Metropolitan Plan 2036*.

1.3 Mining, Petroleum Production and Extractive Industries

The planning proposal states it does not cover any known areas to have existing resources. The proposed residential and business zoning would have the effect of prohibiting mining and extractive industries.

Council consulted with the then Department of Industries (Resources and Geosciences). The agency has not raised any concerns in relation to sterilisation of resources and the site is not in a mining lease.

The agency advised it requests to be consulted in relation to any proposed locations for biodiversity offset areas or any supplementary biodiversity measures to ensure there is no consequent reduction in access to prospective land for mineral exploration, or potential for sterilisation of mineral or extractive resources.

2.1 Environmental Protection Zones

The 2016 planning proposal had proposed part of the site E2 Environmental Conservation. Since this planning proposal, land management and biodiversity conservation reforms have commenced under the *Biodiversity Conservation Act 2016*.

The planning proposal is currently inconsistent with this direction as Council has not undertaken a full assessment of the environmental impacts (clause 4).

The proponent is currently preparing a biodiversity conservation assessment report under the *Biodiversity Conservation Act 2016*. The planning proposal states the draft biodiversity conservation assessment report aims to secure 800 hectares of land for biodiversity stewardship.

The *Biodiversity Assessment Method Operational Manual* provides that field surveys more than five years old are not supported. Accordingly, targeted species surveys were required to be undertaken. This body of work was being undertaken over the course of 2019/20 to allow for seasonal variations and environmental conditions.

As the biodiversity conservation assessment report has not been finalised or assessed by the relevant authority, the planning proposal remains inconsistent with this direction. An assessment for consistency with this direction will be undertaken prior to finalisation of the local environmental plan.

2.3 Heritage Conservation

The Aboriginal cultural heritage assessment was prepared for the 2016 the planning proposal and is now five years old. The planning proposal states the assessment at that time identified one recorded artefact site and two areas of high archaeological sensitivity in the area that may be impacted by the proposed development, and requires further archaeological investigation.

It is proposed that further consultation be undertaken with the Mindaribba Local Aboriginal Land Council as part of the Gateway determination.

Further consultation with Heritage NSW and local Aboriginal groups will also be required post exhibition of the planning proposal in order to inform the development control plan for the site.

The planning proposal states that additional consultation is required with local Aboriginal groups to update them regarding the current status of the planning proposal prior to determining consistency with the direction.

2.6 Remediation of Contaminated Land

The planning proposal is currently inconsistent with this direction as Council has concerns over the adequacy of the soil sampling carried out. The proponent has been requested to provide further sampling and analysis consistent with the 'Managing Land Contamination Planning Guidelines' in order to ensure consistent with the requirements of this direction.

An assessment for consistency with this direction will be undertaken prior to the finalisation of the local environmental plan.

3.4 Integrating Land Use and Transport

Transport for NSW has advised it is preparing a Main Road 195 corridor strategy and undertaking modelling for the Hart Road interchange, including investigation of a potential connection between M15 and MR195.

Council is also preparing a site specific development control plan.

The planning proposal is potentially consistent with this direction, and an assessment for consistency will be undertaken the above analysis being undertaken by Transport for NSW is completed.

4.2 Mine Subsidence and Unstable Land

Part of the site has been identified as containing shallow underground mine workings and is located within a Proclaimed Mine Subsidence District. Subsidence Advisory NSW has advised the mine subsidence risk must be effectively eliminated prior to any subdivision/development of the affected land.

Council advised it is not proposed to rezone the area impacted by mine subsidence.

The planning proposal states the development control plan for the site will detail measures to manage mine subsidence risk in accordance with the requirements of Subsidence Advisory NSW. Council recommends the proponent undertake further consultation with the agency during preparation of the draft plan to ensure the risk is adequately mitigated.

Therefore, the planning proposal is consistent with direction.

4.3 Flood Prone Land

The planning proposal advises that the site is not affected by flooding. Urban development on the site (in conjunction with surrounding planning proposal in Cessnock local government area) will facilitate access for Gillieston Heights that is above the 1:100 ARI flood event.

Agency advice from Biodiversity Conservation Division has confirmed the planning proposal is consistent with direction.

4.4 Planning for Bushfire Protection

The planning proposal is potentially inconsistent with this direction.

The 2016 planning proposal predate current standards. A revised bushfire report is being prepared in accordance with the *Planning for Bushfire Protection 2019* and further consultation will be required to be undertaken with the NSW Rural Fire Service..

Therefore, any inconsistency with this direction will be considered following consultation with NSW Rural Fire Service.

5. SITE-SPECIFIC ASSESSMENT

5.1 Social

The planning proposal has considered social and economic impacts. While difficult to quantify, Council conclude that there is a positive net community benefit from the planning proposal considering new housing at different price points to support the creation of additional jobs.

Council identified the need for quality public transport, greater connectivity between development areas and additional community facilities as a result of this planning proposal.

The planning proposal will provide homes close to jobs and existing infrastructure aligning with the Department's policies and regional plans.

5.2 Environmental

As assessed in Section 4.4 of this report there are a number of environmental matters relevant to the planning proposal relating to contamination, biodiversity, heritage and bushfire impacts.

Council's assessment of environmental impacts notes the various specialist studies that address the key environmental attributes of the site. These include:

- Threatened Species (Ecological, March 2015);
- Aboriginal Cultural Heritage Assessment (AECOM, Dec 2014);
- Stormwater Impact Assessment (PCB, Dec 2014);
- Servicing Strategy (PCB, Dec 2014);
- Wallis and Swamp Fishery Creeks Flood Study (WMA, Feb 2019);
- Bushfire (Kleinfelder, Feb 2015);
- Geotechnical Assessment (Douglas, March 2015);
- Heritage Impact Assessment (RPS, March 2015);
- Visual Impact Assessment (Envisage, March 2015)
- Economic (Urbis, March and June 2015)
- Socio and economic (Elton, March 2015)
- Contamination (Phase 2) Assessment Reports (Environ, April 2015);
- Noise and Vibration Impact Assessment (VIPAC, March 2015); and
- Traffic and Transport Study (Hyder, March 2015).

Council have provided information to support their recommendation that other than biodiversity, the abovementioned environmental attributes can be managed through either development control plan and/or development application stage.

The consideration of biodiversity impacts is being undertaken concurrently with the assessment of this planning proposal. The process involves consultation with Council on a draft biodiversity conservation assessment report before the report is finalised and submitted to the Biodiversity Conservation Division for assessment.

Council note in the absence of a biodiversity conservation assessment report and a biodiversity certification order under the *Biodiversity Conservation Act 2016*, it is unable to determine whether there is any likelihood of critical habitat or threatened species impacts.

5.3 Economic

The holistic planning outcomes across the whole Hydro site within both the Maitland and Cessnock local government areas includes significant job creation opportunities and flow on effects for the economy.

This planning proposal provides homes close to jobs within the Greater Newcastle Metropolitan area. The construction of homes and infrastructure will generate economic benefits.

5.4 Infrastructure

The planning proposal includes a servicing strategy for the entire Hydro site and the planning proposal states the supply of water to the site would be based on a staging that provides security of supply in the short-term and adequate main sizes for the ultimate proposed development. The planning proposal also includes information for sewer, electricity, gas and communication connections.

TfNSW are currently preparing the Cessnock Road Corridor Strategy (MR195) and the planning proposal will need to be updated to be consistent with the outcomes of this corridor strategy once exhibited.

Transport for NSW in correspondence to Council has raised objection to the planning proposal on the grounds the traffic assessment is out of date.

There are process currently underway to resolve a number of traffic and transport matters. In particular:

- drafting of the Cessnock Road (MR195) corridor strategy by Transport for NSW is nearing completion and this will satisfy the need to determine the consolidated access points along MR195 and staging/development thresholds for upgrades; and
- Transport for NSW is undertaking additional work on the information needed for a traffic impact assessment for the Hart Road interchange and potential bypass between the Hunter Expressway and Cessnock Road.

The above processes will ensure matters are addressed as part of finalisation of the local environmental plan and enable infrastructure and development contribution matters to be resolved at a subdivision or development application stage.

6. CONSULTATION

6.1 Community

Council propose to undertake community consultation in accordance with their Community Participation Plan.

While the requirements are for a minimum of 28 days, the consultation period may occur during the Christmas period, thus be extended in accordance with Council policy. This approach is considered appropriate.

6.2 Agencies

Public agency consultation has already occurred for the existing planning proposal.

Further consultation with Biodiversity Conservation Division, Mindaribba Local Aboriginal Land Council and NSW Rural Fire Service is required during the public exhibition period to address the matters raised during agency consultation.

Council have identified further agency responses that may require resolution, such as Subsidence Advisory NSW and South Maitland Railway.

7. TIME FRAME

Council have proposed a six (6) month timeframe to complete the LEP process. A 12 month timeframe is recommended to provide additional time should any part of the process be delayed such as resolving the Biodiversity Conservation Assessment Report and transport related matters.

The Department encourages Council to publicly exhibit the planning proposal as soon as possible given agency consultation is largely complete.

8. LOCAL PLAN-MAKING AUTHORITY

Council has requested to be the local plan-making authority.

There remain several inter-related matters that will be required to be resolved prior to finalisation, including Biodiversity Conservation Assessment Report and TfNSW's MR195 corridor strategy. These also relate to several potential inconsistencies with section 9.1 Ministerial directions.

Given these matters, it is not proposed to make Council the local plan-making authority.

9. CONCLUSION

In 2016, a Gateway determination (PP_2016_MAITL_001_00) was issued for this site, and the strategic and site specific merits of the proposal have been supported since 2016.

The current planning proposal recognises the previous work undertaken by Council for PP_2016_MAITL_001_00 and as outlined in Table 1 the majority of the Gateway determination conditions have been resolved.

The planning proposal is consistent with State, regional and local planning policies and strategies, and implements the intention of parts of these strategies through the creation of strategically located dwellings and conservation lands.

10. RECOMMENDATION

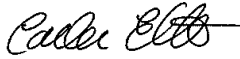
It is recommended the delegate of the Secretary:

1. **agree** that any inconsistencies with following section 9.1 Ministerial directions are minor or justified:
 - 1.2 Rural Zones; and
 - 1.5 Rural Lands.
2. **note** that the consistency with following section 9.1 Ministerial directions is unresolved and will require justification
 - 2.1 Environment Protections Zones;
 - 2.3 Heritage Conservation;
 - 2.6 Remediation of Contaminated Land;
 - 3.4 Integrating Land Use and Transport; and
 - 4.4 Planning for Bushfire Protection.

It is recommended the delegate of the Minister determine that the planning proposal should proceed subject to the following conditions:

1. Prior finalisation of the local environmental plan:
 - (a) comments in Transport for NSW's correspondence to Maitland City Council dated 15 May 2020 are addressed; and
 - (b) consideration is given to an exhibited biodiversity conservation assessment report, preliminary contamination report and revised bushfire report.
2. The planning proposal should be made available for community consultation for a minimum of 28 days.
3. Consultation is required with the following public authorities:
 - Biodiversity Conservation Division;
 - Mindaribba Local Aboriginal Land Council; and
 - NSW Rural Fire Service

4. Council should also consult with the owners of the South Maitland Railway to consider the requirements for the existing level crossing.
5. The time frame for completing the LEP is to be 12 months from the date of the Gateway determination.



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1/12/2020

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