

Post-Exhibition Report – PP-2021-6630

The planning proposal (Attachment A-A4) seeks to amend the Georges River Local Environmental Plan (LEP) 2021 to rezone a former public administration building to R4 High Density Residential with additional permitted uses at 143 Stoney Creek Road, Beverly Hills (provision of approx. 38 homes, 0 jobs)

1 Introduction

The planning proposal is at the post exhibition stage, which is the last stage before an LEP may be made and finalised. The Sydney South Planning Panel (the Panel) determined at a rezoning review that the proposal had strategic and site merit (15 December 2022). Subsequently, a Gateway assessment was undertaken, and a Gateway determination was issued on 2 March 2023 for the proposal to proceed, subject to conditions. Consultation with Agencies and the community required by the Gateway determination conditions has now been completed.

The purpose of this report is to provide a summary of the key matters raised by members of the public, Georges River Council, and public agencies during the public exhibition of the planning proposal (**Attachment A**) for 143 Stoney Creek Road, Beverly Hills (the site). The report makes a recommendation to the Panel that it submit the proposal to the Department of Planning and Environment for finalisation.

Timeline of the planning proposal

Element	Description
Date of request to exhibit PP	17 April 2023
Date of panel determination on rezoning review	15 December 2022
Planning Proposal no.	PP-2021-6630
LGA	Georges River
LEP to be amended	Georges River Local Environmental Plan (LEP) 2021
Address	143 Stoney Creek Road, Beverly Hills
Brief overview of the timeframe/progress of the planning proposal	<p>17 November 2021 – Planning proposal lodged with Council</p> <p>February to July 2022 – Council provided advice and requests for additional information. Proponent submitted a revised planning proposal.</p> <p>6 October 2022 – Proponent lodged Rezoning Review request after Council failed to indicate support for the proposal within 90 days.</p> <p>13 December 2022 – The Panel considered the Rezoning Review.</p>

Element	Description
	<p>15 December 2022 – The Panel determined the planning proposal be submitted for Gateway and appointed itself as the PPA.</p> <p>3 February 2023 – Proposal is submitted for Gateway assessment.</p> <p>2 March 2023 – Gateway Determination issued.</p> <p>27 April 2023 to 26 May 2023 – Public exhibition of planning proposal and supporting documents.</p> <p>27 April 2023 - Updated Flood Risk Impact Assessment provided by proponent.</p> <p>19 June 2023 – Proponent provided a response to submissions.</p>
Finalisation date required by Gateway Determination	2 December 2023
Department contact:	Douglas Cunningham, Specialist Planning Officer

1.1 The Site and local context

The planning proposal applies to 143 Stoney Creek Road, Beverly Hills, and comprises Lots 2 and 3 in DP1205598 (**Figure 1**). The site has a total area of approximately 2,454m² and has street frontages to Stoney Creek Road and Cambridge Street.

The site is located approximately 500m south of Beverly Hills train station, 1km south of the Southwestern Motorway/King George's Road intersection, and approximately 3km north of Connells Bay in George's River. The site is also located within 200m of the Beverly Hills town centre.

Existing development on the site comprises of a former Roads and Traffic Authority (RTA) administration centre and carpark, which was vacated approximately four years ago and transferred into private ownership.

Surrounding development is characterised by a mix of residential flat buildings and low density detached and semi-detached dwellings. Heights in the area range from one to three storeys. To the north of the site, on King Georges Road, is the Beverly Hills Town Centre which includes retail, entertainment, commercial and service uses.



Figure 1 – Subject site (source: Sixmaps, July 2023)

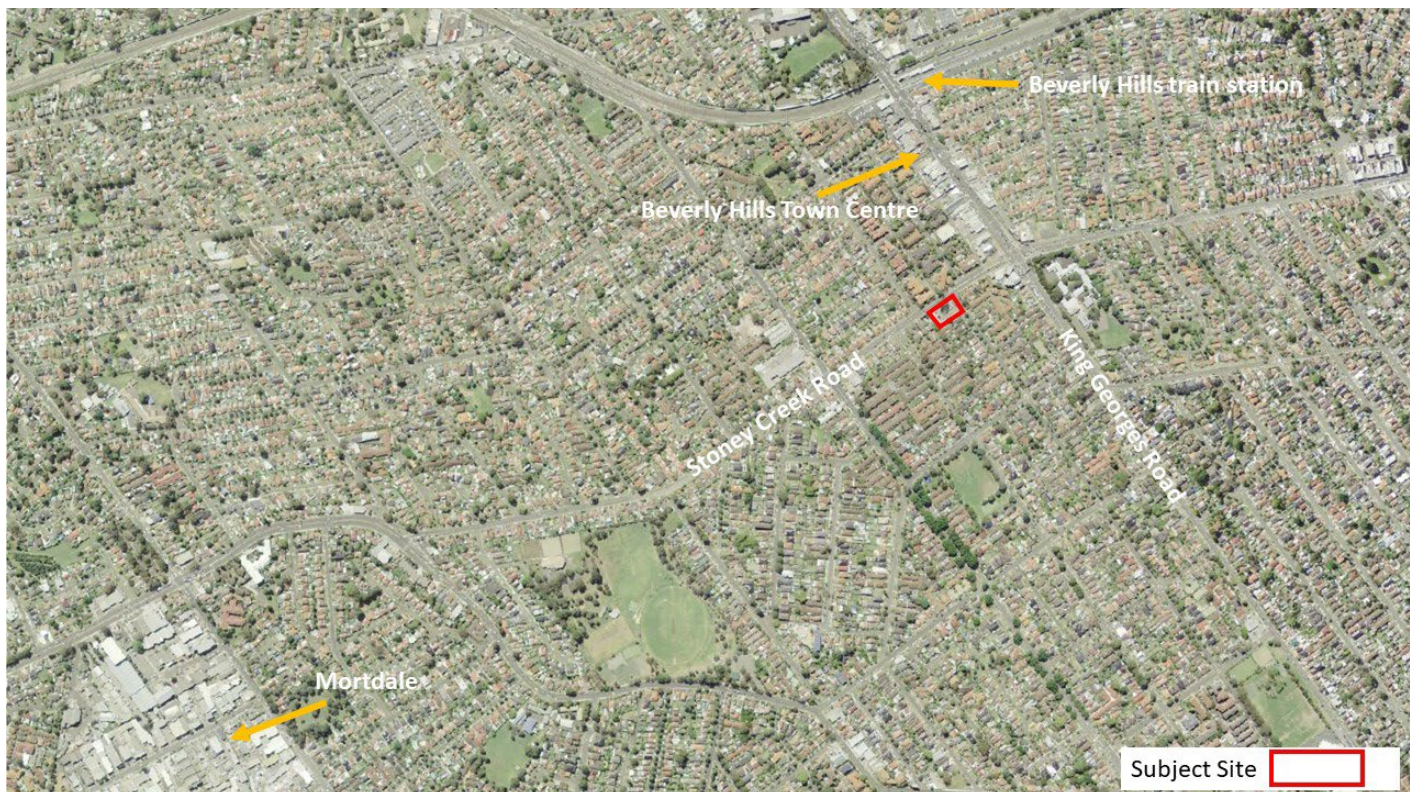


Figure 2 – Context site (source: Nearmap, May 2023)

1.2 Planning Proposal

The planning proposal seeks to amend the Georges River LEP 2021 to rezone the former RTA building to R4 High Density Residential with additional permitted uses (**Attachment A**).

Table 1 – Overview of planning proposal

Element	Description
Site Area	2,454m ²
Site Description	The site is known as 143 Stoney Creek Road, Beverly Hills (Lots 2 and 3, DP1205598).
Proposal summary	<p>The planning proposal seeks to amend the Georges River LEP 2021 by:</p> <ul style="list-style-type: none"> Rezoning the site from part SP2 Public Administration and part R2 Low Density Residential to R4 High Density Residential Amending the Floor Space Ratio (FSR) from 0.55:1 to 1.4:1, increasing the maximum building height from 9m to 16m and increasing the minimum lot size from 450m² to 1,000m² on the former R2 Low Density Residential land Introducing a FSR of 1.4:1, maximum building height of 16m and minimum lot size to 1,000m² on the former SP2 Public Administration land Introducing 'office premises' and 'business premises' as additional permitted uses under Schedule 1.
Relevant State and Local Planning Policies, Instruments	<ul style="list-style-type: none"> Greater Sydney Region Plan (A Metropolis of Three Cities) South District Plan 9.1 Ministerial Direction 4.1 Flooding 9.1 Ministerial Direction 4.4 Remediation of Contaminated Land 9.1 Ministerial Direction 5.1 Integrating Land Use and Transport 9.1 Ministerial Direction 5.2 Reserving land for public purposes 9.1 Ministerial Direction 6.1 Residential Zones State Environmental Planning Policy (Transport and Infrastructure) 2021 State Environmental Planning Policy (Resilience and Hazards) 2021 State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 SEPP No 65 – Design Quality of Residential Apartment Development Georges River LEP 2021 Georges River Local Strategic Planning Statement (LSPS) Georges River Local Housing Strategy (LHS) Georges River Local Infrastructure Contributions (SIC) Plan 2021 Georges River Community Strategic Plan 2022-2032 Draft Beverly Hills Town Centre Master Plan

The planning proposal (**Attachment A** and **Table 1**) seeks to amend the Georges River LEP 2021 per the changes in **Table 2** below.

Table 2 – Current and proposed controls

Control	Current	Proposed
Zone	Part SP2 Government Administration and part R2 Low Density Residential	R4 High Density Residential
Maximum height of the building	No HOB on SP2 zoned portion of the site. 9m HOB on the R2 zoned land.	16m
Floor space ratio	No FSR applies to the SP2 zoned portion of the site. An FSR of 0.55:1 applies to the R2 zoned land.	1.4:1
Minimum lot size	No minimum lot size applies to the SP2 zone. A 450m ² minimum lot size applies to the R2 zone	1,000m ²
Additional Permitted Uses	N/A	“Business premises” and “office premises” to be included as land uses permitted with consent in Schedule 1

The objectives of the planning proposal are to expand the permissible uses on the site. The planning proposal is supported by a concept scheme for a residential development outcome (**Attachment A1**). The concept is for a potential residential flat building on the site, comprising 38 residential dwellings and 71 vehicle parking spaces.

1.2.1 Mapping

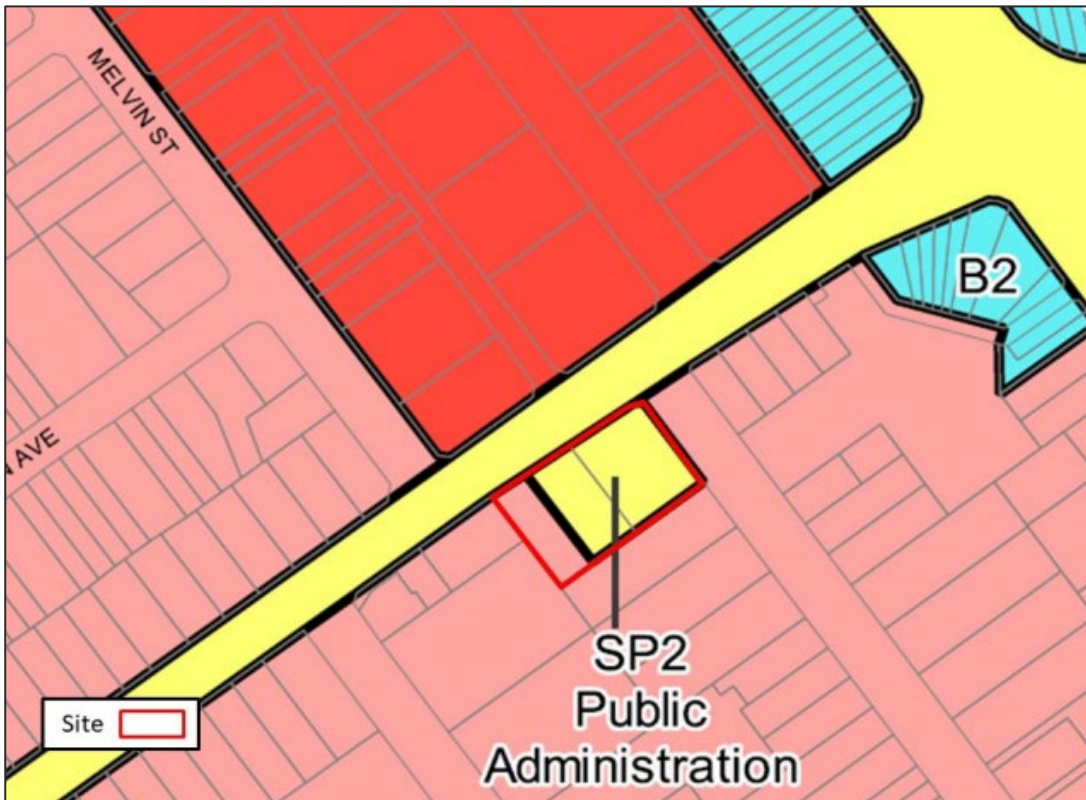


Figure 2. Current land use zoning map (source: Planning Proposal, March 2023)

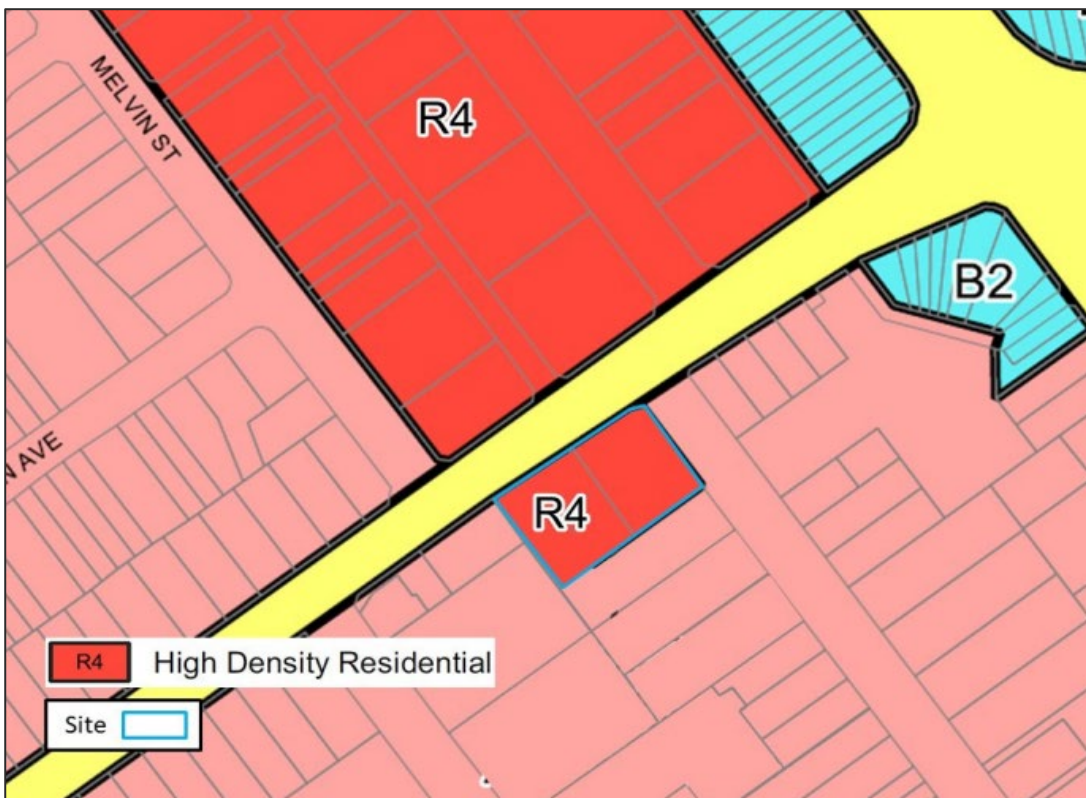


Figure 3: Proposed land use zoning map (source: Planning Proposal, March 2023)

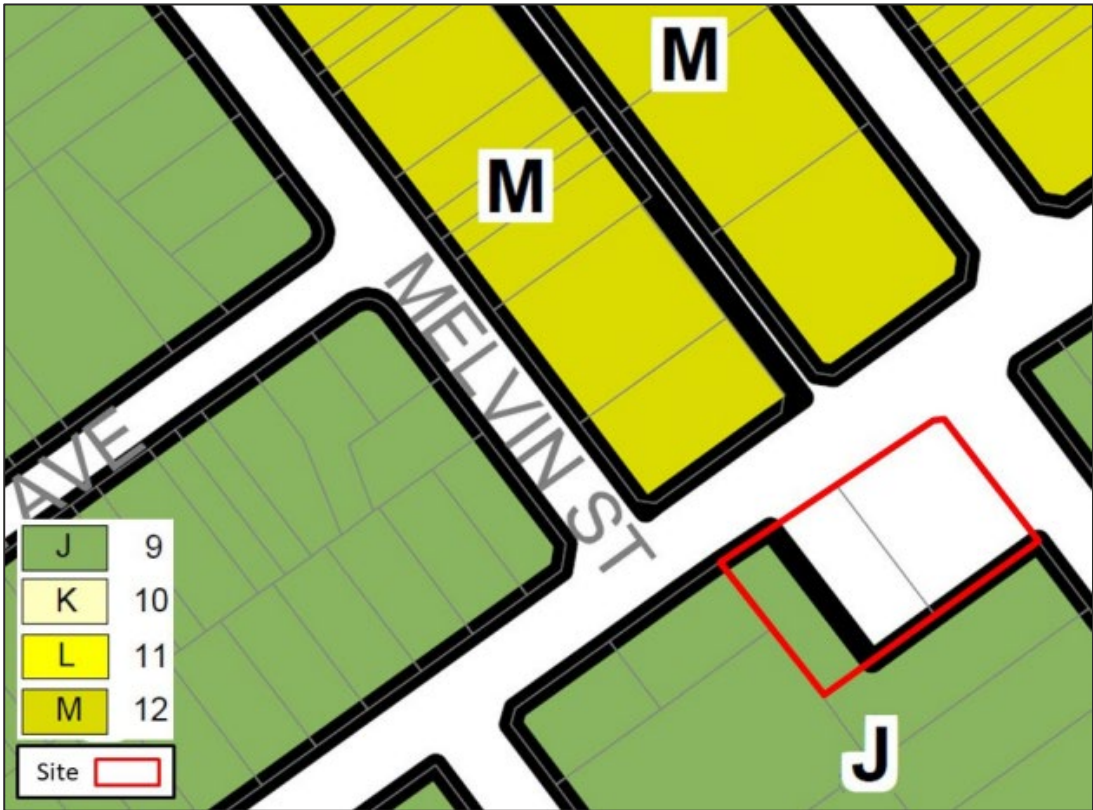


Figure 4: Current height of building map (source: Planning Proposal, March 2023)



Figure 5: Proposed height of building map (source: Planning Proposal, March 2023)

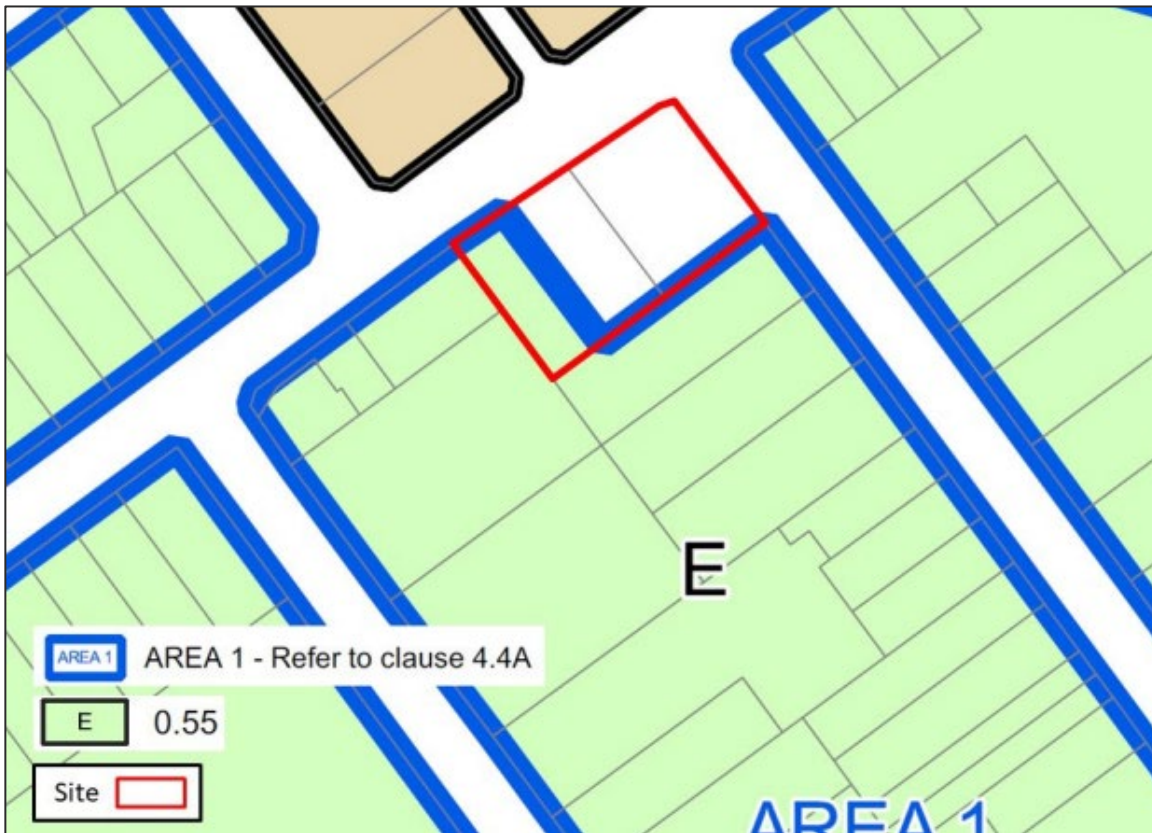


Figure 6: Current FSR map (source: Planning Proposal, March 2023)



Figure 7: Proposed FSR map (source: Planning Proposal, March 2023)



Figure 8: Current minimum lot size map (source: Planning Proposal, March 2023)

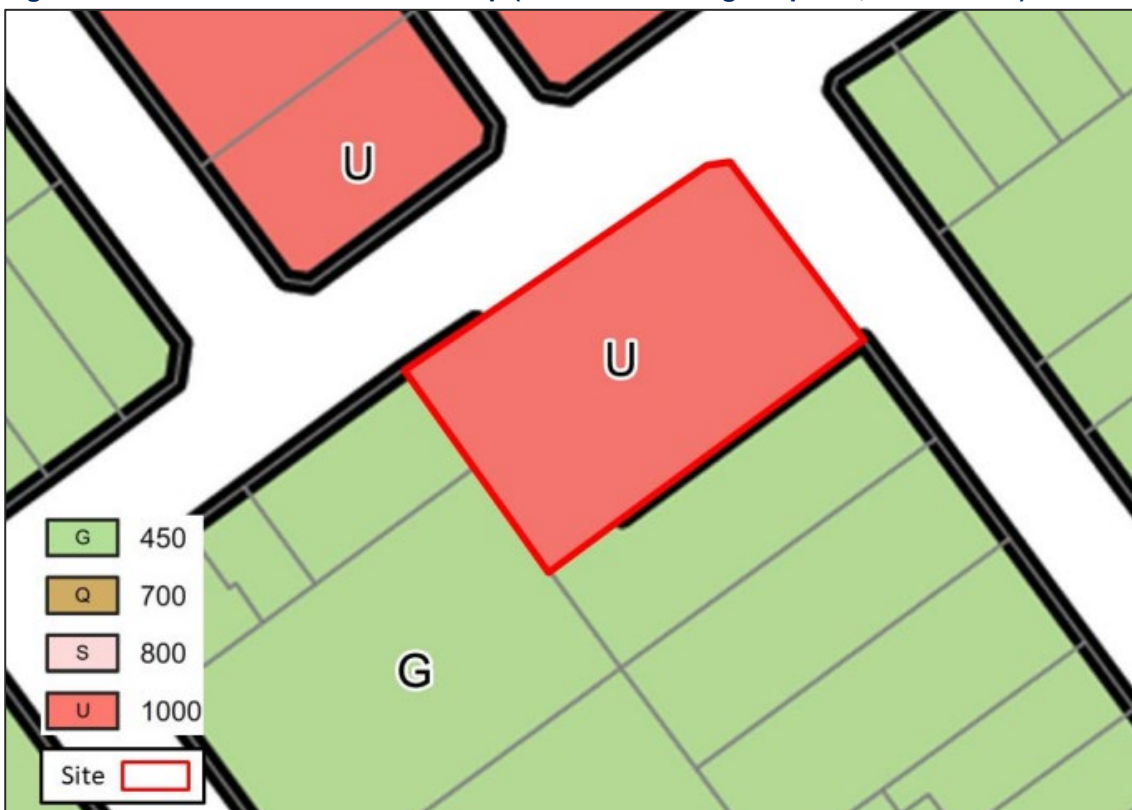


Figure 9: Proposed minimum lot size map (source: Planning Proposal, March 2023)

1.3 Rezoning Review

On 13 December 2022, the Panel considered a rezoning review for this planning proposal because Council failed to indicate support for the proposal within 90 days.

On 15 December 2022, the Panel determined to support the planning proposal because the proposal has demonstrated strategic and site-specific merit and is consistent with State and local strategies, however, should consider a review of its Development Contributions Plan. The Panel also recommended that the LEP amendment and site specific DCP be revised to include a minimum lot size consistent with the R4 zone.

The Panel's determination and reasons for its decision are provided in **Attachment B**.

In making its determination, the Panel appointed itself as the Planning Proposal Authority (PPA).

The proposal was submitted to the Department for a Gateway determination on 3 February 2023.

1.4 Gateway determination

The Gateway determination issued on 2 March 2023 (**Attachment C**) determined that the proposal should proceed subject to conditions. The Gateway conditions are provided in full below:

1. *Prior to community consultation, the planning proposal is to be updated to:*
 - a. *Include reference to 'office premises' as a proposed additional permitted use, to accord with the standard definitions in the Standard Instrument (Local Environmental Plans) Order 2006.*
 - b. *address the consistency of the proposal with the Georges River Community Strategic Plan (Working Together for a better future – Community Strategic Plan 2022-2032)*
2. *Public exhibition is required under section 3.34(2)(c) and clause 4 of Schedule 1 to the Act as follows:*
 - a. *the planning proposal is categorised as standard as described in the Local Environmental Plan Making Guidelines (Department of Planning and Environment, 2022) and must be made publicly available for a minimum of 20 days; and*
 - b. *the planning proposal authority must comply with the notice requirements for public exhibition of planning proposals and the specifications for material that must be made publicly available along with planning proposals as identified in Local Environmental Plan Making Guidelines (Department of Planning and Environment, 2022).*

Exhibition should commence within 3 months following the date of the gateway determination.
3. *Consultation is required with the following public authorities and government agencies under section 3.34(2)(d) of the Act and/or to comply with the requirements of applicable directions of the Minister under section 9 of the EP&A Act:*
 - *Transport for NSW*
 - *Sydney Water*
 - *NSW State Emergency Service*
 - *NSW Department of Planning and Environment's, Environment and Heritage branch*

Each public authority is to be provided with a copy of the planning proposal and any relevant supporting material via the NSW Planning Portal and given at least 30 days to comment on the proposal.
4. *Prior to any finalisation, the proposal and relevant technical studies must be updated (as required and in consideration of agency comments received during consultation) to address the*

following flood matters in the context of potential high density residential development and the land uses permitted in the R4 High Density Residential zone:

- i. Consistency and/or justification with all applicable Direction 4.1 Flooding requirements.*
 - ii. The full range of flooding events on the site, up to a Probable Maximum Flood (PMF) event.*
 - iii. Identify and map all flooding hazards associated with the full range of flooding events up to PMF.*
 - iv. Any flooding impacts which may arise from cut and fill on the site.*
 - v. Any flooding impacts (on and off-site) which may arise from development which may occur within a 1% AEP and PMF impacted area of the site.*
 - vi. Climate change impacts; and*
 - vii. Evacuation management for the site.*
- 5. A public hearing is not required to be held into the matter by any person or body under section 3.34(2)(e) of the EP&A Act. This does not discharge the planning proposal authority from any obligation it may otherwise have to conduct a public hearing (for example, in response to a submission or if reclassifying land).*
 - 6. Given the nature of the proposal, the Sydney South Planning Panel is not authorised to be the local plan-making authority.*
 - 7. The timeframe for completing the LEP is 9 months from the date of Gateway determination.*

1.5 Consistency with Gateway conditions

A full assessment of the proposal's consistency with the Gateway conditions is contained in **Attachment D**. The Gateway determination required the proposal and relevant technical studies must be updated to address the flood matters in the context of potential high density residential development and the land uses permitted in the R4 High Density Residential zone. The proponent has submitted an updated Flood Risk Impact Assessment (FRIA) (Northrop, April 2023) (**Attachment J**) to address the matters listed in condition 4 of the Gateway determination.

The Agile Planning team is satisfied that the proponent has met the Gateway conditions sufficient to proceed to finalisation.

2 Community Consultation

2.1 Public Exhibition

On 17 April 2023 the Agile Planning team advised the Panel Secretariat that the Planning Proposal had been satisfactorily amended to meet the gateway conditions for public exhibition to commence.

In accordance with the Gateway determination, the planning proposal and supporting material were publicly exhibited on the NSW Planning Portal for 20 working days, from 27 April 2023 to 26 May 2023.

3 Submissions

3.1 Submissions during exhibition

There were 11 submissions received from individuals, Council, and government agencies during the exhibition period, including:

- 6 public submissions, comprising of 5 unique submissions and one submission submitted without content
- 4 Agency submissions
- 1 Council submission

During the exhibition of the council led site-specific DCP, a submission was received by Council which was considered to relate to the Planning Proposal and was forwarded to the Department. Whilst this submission has not been officially counted as a submission received during the public exhibition of the Planning Proposal, the issues raised have been captured below and as part of the proponent's response to submissions.

All public submissions containing content objected to the proposal (5 submissions).

A table outlining the Agile Planning Team's response to submissions is provided at **Attachment E** and the Proponent's response to submissions is provided at **Attachment I**.

3.1.1 Submissions from Agencies and Council

In accordance with the Gateway determination, the following agencies were consulted with:

- Transport for NSW (TfNSW).
- Sydney Water
- NSW State Emergency Service (SES)
- NSW Department of Planning and Environment's, Environment and Heritage branch (EHG)

The agencies submissions are provided in full at **Attachment G**.

A submission was also received from Georges River Council (**Attachment F**), which raised issues with the proposal including:

- the importance and need for a site-specific DCP amendment; and
- the necessity for a Voluntary Planning Agreement to address the local demands and cumulative impacts of the new residential population.

No issues were raised in the agencies and council submissions that would preclude the proposal proceeding.

4 Key Issues from submissions

The main concerns raised by the community are as follows:

- Building height and local character
- Traffic and parking
- Proposed business office premises uses
- Flooding

Redacted copies of the public submissions are provided at **Attachment H**.

4.1.1 Building height, density, and local character

The height and scale would adversely impact the local character and residential amenity.

Community submission

Concerns were raised in relation to the scale of the proposed development and lack of connection with the local character of the area. Submissions cited visual impacts from the height and density of the building would impact the area and lead to potential overshadowing.

Proponent response

No height or FSR development standards currently apply to most of the site (SP2 zoned land). To provide certainty around the future built form outcomes on the site and limit the impacts of any future development on the surrounding properties, a 16-metre height of buildings control and 1.4:1 maximum FSR control are sort.

These proposed controls were approved by Council (DA2020/0227) for the site in February 2021. As part of the assessment of the approved three storey medical centre on the site, Council found that the height and FSR of the development was compatible with the surrounding land uses and within its context. In accordance with the planning principle established in *Project Venture Developments v Pittwater Council* [2005] NSWLEC 191 for determining whether a proposal is compatible with its context, Council considered whether:

- The proposal's physical impacts on surrounding development are acceptable. The physical impacts included noise, overlooking, overshadowing, and constraining development potential.
- The proposal's appearance is in harmony with the building around it and the character of the street.

The proposal was found to be acceptable for each of these considerations.

A similar assessment of a preliminary design for a residential flat building on the site has been undertaken by Council. The concept plans demonstrate that a residential flat building of a similar envelope to the medical centre, will result in no greater impacts to the surrounding sites when compared with the approved medical centre building on the site.

Agile Planning team response

The site is across the road from an existing high density residential zone area and within 200m of the Beverley Hills Town Centre. The Beverley Hills Town Centre currently has a FSR of 2:1 for its E1 Local Centre zoned land. Although the height controls that are part of this proposal are slightly higher than the surrounding high density residential zoned land, concept plans demonstrate that a residential flat building of a similar built form to the approved medical centre, will result in similar impacts to development already approved for the site.

Should the site be developed for a residential flat building, it would be subject to detailed assessment against the provisions of scale, height, and compatibility with the surrounding characters at development application stage in accordance with the State Environmental Planning Policy No.65 – Design Quality of Residential Apartment Buildings.

The Agile Planning team is satisfied that the planning proposal provides a suitable response to the issues raised relating to building height and local character and do not prevent the proposal from progressing to finalisation.

4.1.2 Traffic and parking

The proposal will add to the existing traffic congestion problems and impact on-street parking.

Community submission

The community submissions raised concerns that the proposal will add to the existing traffic congestion in the area and will exacerbate pedestrian safety and on-street parking issues.

Transport for NSW submission

TfNSW raised no objection to the proposal, subject to all vehicular access to any proposed development being via Cambridge Street rather than from Stoney Creek Road.

Proponent response

The former RTA use of the site resulted in 130 peak hour trips, the approved medical centre results in 110 peak hour trips, whilst a potential residential flat development of the site will result in approximately 18 peak hour trips.

The planning proposal will allow for alternative development of the site which will result in reduced traffic impacts when compared with the historical and recently approved uses of the site.

The actual traffic impact associated with the redevelopment of the site will be assessed during a future development application.

Car parking associated with the redevelopment of the site will be assessed during a future development application.

Agile Planning Team's response

The proponent has provided traffic modelling in its Traffic Impact Assessment (Ason Group, April 2022) (**Attachment A3**) which concludes that any potential traffic impacts will be minor, and that car parking rates consistent with DCP requirements can be achieved on site. The Traffic Impact Assessment also found that traffic generation resulting from any potential residential flat building would be less than what is expected under the currently approved medical centre.

TfNSW raised no objection subject to all vehicular access to any proposed development being via Cambridge Street rather than from Stoney Creek Road.

Should the site be developed for a residential flat building, it would be subject to further detailed assessment to address traffic generation and the provision of on-site parking at development application stage.

The Agile Planning team is satisfied that the issues relating to traffic and parking have been addressed by the proponent and do not prevent the proposal progressing to finalisation.

4.1.3 Proposed business office premises uses

The rezoning does not reflect the desired future land uses for the local area.

Community submission

Three pro-forma submissions stated that office or retail uses are not in high demand in the area as a result of King George's Road existing retail and commercial areas. The submissions recommend that the proposal is amended to remove the proposed additional permitted uses and prevent office, business, retail or food and drink premises being permitted on site.

Council response

Council supports the planning proposal, including the proposed zoning and additional permitted uses. Council is of the view that the proposal is consistent with the Greater Sydney Region Plan, the South District Plan, the Georges River LSPS and the George River LHS as it seeks to facilitate

housing and employment opportunities on a currently underutilized site near a local centre and transport options.

Proponent response

The SP2 Infrastructure (Public Administration) zone has become redundant since the site is no longer occupied. The reasons for the proposed R4 High Density Residential zone and the additional permitted uses of “office premises” and “business premises” are:

- the proposed R4 zone reflects the residential context of the site.
- the proposed R4 zone reflects the scale and density of the recently approved building on the site.
- the proposed R4 zone allows for the type of development which is compatible with the flood affection of the site, being residential flat buildings and shop top housing which have a large format floorplate capable of accommodating a flood chamber below ground floor; and
- “Office premises” and “business premises” are proposed as additional permitted uses to broaden the range of uses that can occupy the existing building on the site and the approved three storey medical building

Agile Planning team’s response

In making its determination, the Panel determined that the planning proposal, including the proposed zoning and additional permitted uses, demonstrated strategic and site-specific merit.

Council also supports the proposed zoning and additional permitted uses as it is considered an appropriate planning response to its context and the intended land uses within the proposal do not meet the objectives of the current SP2 Infrastructure (Public Administration) zone.

The planning proposal has demonstrated strategic and site-specific merit to support the proposed rezoning and additional permitted uses to justify the progression of the proposal in its current form. It is considered that the proposal is consistent with the overarching State and local strategic documents and that the zoning would permit the site to achieve objectives within these strategic plans, such as the delivery of housing near jobs and homes, and work towards the goal of creating a 30-minute city with improved local access.

The Agile Planning team is satisfied that the issues raised relating to the proposed zoning and land uses have been addressed by the proponent and do not preclude the proposal from proceeding to finalisation.

4.1.4 Flooding

The proposal is located on land that is an area that is affected by flooding.

Community submission

As noted above, the Agile Planning team received one community submission from Council relating to the exhibition of the site-specific DCP that raised matters not covered off in other submissions received on the planning proposal. This submission raised concern regarding flooding on site and whether it had been assessed and mitigated. This submission has not been counted as a public submission on the planning proposal, but the issue of flooding has been addressed by the proponent.

SES submission

In their submission, SES noted that the site is directly in a known overland flow path within the 1% Annual Exceedance Probability (AEP) flood extent, is prone to high velocity flooding on and

immediately surrounding the site and is inconsistent with Ministerial Section 9.1 Direction 4.1– Flooding.

SES identifies that the principles of the NSW Floodplain Development Manual 2005 discourage development that increases risk to people and property in flood events and that flood risk assessments should consider a full range of flood events and consider impacts of the surrounding area and evacuation. SES submission does not support reliance on shelter in place strategies and identified that private flood evacuation plans increase SES responsibilities.

EHG submission

EHG identified the site is in the Bardwell Creek Catchment and would be flood affected under frequent to rare events based on the flood modelling results of the overland flow study.

EHG noted that the supporting Flood Risk Impact Assessment (prepared by Northrop, June 2022) (since updated) (**Attachment A2**) models existing and post development scenarios and that the proposal results in some improvement in flooding conditions however the site would still be subject to high hazards (H5) during PMF events.

Additionally, EHG was concerned with the change in zoning appears to be inconsistent with the Ministerial Directions 4.1 Flooding.

Proponent Response

An updated FRIA (April 2023) has been submitted during the exhibition period and a response to the concerns raised by both SES and EHG has been submitted (**Attachment J**).

The updated FRIA (April 2023) indicates the site is in a low flood hazard area, as determined by the Georges River Council Stormwater Management Policy (2020). The FRIA also noted that a small spike in flow velocities occurs during certain flood conditions, however this occurs as the flows pass around the existing building and that most of the site remains exposed to low flood hazard conditions during the 1% AEP.

The NSW Floodplain Development manual does not support the use of zoning to unjustifiably restrict development simply because land is flood prone and should be based on objective assessments.

The NSW DPE Draft Shelter-in-Place guideline suggests shelter in place may be suitable for flash flood events, where a short warning and inundation time is expected. This is consistent with the type of event that is expected to occur at the subject site.

Furthermore, the flood risk associated with the proposed residential development can be managed through engineered solutions and operational measures. Habitable spaces can be placed at an appropriate height above the flood level and outline additional development controls in a DCP.

Regarding exposing more residents to flood risk, the site is not considered to be an area of high hazard and the proposed changes sought under this proposal do not represent a significant increase in the development of the land, given these controls reflect the recently approved medical centre on the land.

The updated FRIA (April 2023) has been updated to considers various flood events ranging from the 50% AEP to the PMF (included 1% AEP plus climate change). Evacuation strategies have been investigated and the opportunity for greater education and awareness about flooding is also presented with an opportunity to introduce a regional evacuation centre.

Agile Planning Teams Response

The proponent has submitted an updated FRIA to addresses the matters raised by EHG and SES as well as the Gateway determination. This work concludes that there is no significant change to

flood hazard both on and off site compared to existing conditions. They have also identified several flood mitigation measures to address the concerns raised by SES.

The issues raised by SES and EHG related largely for consideration at any subsequent development application stage on the site. Notwithstanding this, the updated FRIA and modelling submitted by the proponent have addressed the development specific issues raised by SES and EHG.

Regarding the proposals inconsistency with Ministerial Direction 4.1 Flooding, the Agile Planning team is satisfied that the proposal has justified its inconsistency with the direction under the terms of the Direction as the planning proposal is supported by a FRIA (April 2023) prepared in accordance with the principles of the Floodplain Development Manual 2005.

The Agile Planning team is satisfied that the issues relating to flooding have been addressed by the proponent sufficient for the proposal to progress to finalisation.

5 Next Steps

The Department is the Local Plan-Making Authority (LPMA) for this planning proposal.

The Panel's decision and the final planning proposal will be submitted to the Department through the NSW Planning Portal for finalisation.

The Department will prepare a finalisation report in accordance with the LEP Making Guidelines (September 2022) and will determine whether to make the LEP, with or without variation. The Department may defer the inclusion of a matter in the proposed LEP or not make the LEP.

In accordance with section 3.36(1) of the EP&A Act, the Department will organise drafting of the LEP and finalisation of maps and will consult the panel on any draft instrument.

6 Recommendation

Based on this post-exhibition report, it is recommended that the Sydney South Planning Panel determine that the planning proposal should be submitted to the Department for finalisation.

The planning proposal is considered suitable for finalisation because:

- The proposal demonstrates strategic and site-specific merit
- The conditions of the Gateway determination have been met
- Agency and community consultation has occurred in accordance with the Gateway determination
- Submissions raised have been adequately addressed and the proposal warrants support.

6.1 Attachments

Attachment A - Planning Proposal (March 2023)

Attachment A1 – Planning Proposal Appendix A - Concept of a Residential Flat Development (May 2022)

Attachment A2 - Planning Proposal Appendix B - Flood and risk impact assessment (June 2022)

Attachment A3 - Planning Proposal Appendix C - Traffic assessment (April 2022)

Attachment A4 - Planning Proposal Appendix D - Detailed Site Investigation (July 2022)

Attachment B – Rezoning Review Record of Decision (December 2022)

Attachment C – Gateway determination (March 2023)

Attachment D – Assessment against Gateway Determination

Attachment E – Summary of submissions and responses

Attachment F – Council submission

Attachment G – Agency submissions

Attachment H – Community submissions (redacted)

Attachment I – Proponent response to submissions (June 2023)

Attachment J – Updated Flood Risk Impact Assessment (April 2023)



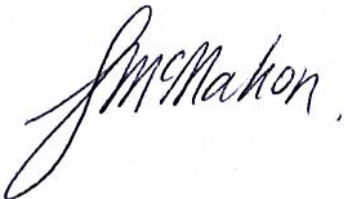
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