



IRF22/1925

## Gateway determination report – PP-2022-1968

---

Amend zoning and development standards to facilitate  
renewal of the Argyll Estate precinct, Coffs Harbour

June 22

Published by NSW Department of Planning and Environment

[dpie.nsw.gov.au](http://dpie.nsw.gov.au)

Title: Gateway determination report – PP-2022-1968

Subtitle: Amend zoning and development standards to facilitate renewal of the Argyll Estate precinct, Coffs Harbour

---

© State of New South Wales through Department of Planning and Environment 2022. You may copy, distribute, display, download and otherwise freely deal with this publication for any purpose, provided that you attribute the Department of Planning and Environment as the owner. However, you must obtain permission if you wish to charge others for access to the publication (other than at cost); include the publication in advertising or a product for sale; modify the publication; or republish the publication on a website. You may freely link to the publication on a departmental website.

Disclaimer: The information contained in this publication is based on knowledge and understanding at the time of writing (June 22) and may not be accurate, current or complete. The State of New South Wales (including the NSW Department of Planning and Environment), the author and the publisher take no responsibility, and will accept no liability, for the accuracy, currency, reliability or correctness of any information included in the document (including material provided by third parties). Readers should make their own inquiries and rely on their own advice when making decisions related to material contained in this publication.

# Acknowledgment of Country

The Department of Planning and Environment acknowledges the Traditional Owners and Custodians of the land on which we live and work and pays respect to Elders past, present and future.

## Contents

<b>1</b>	<b>Planning proposal .....</b>	<b>1</b>
1.1	Overview.....	1
1.2	Objectives of planning proposal .....	1
1.3	Explanation of provisions.....	2
1.4	Site description and surrounding area .....	3
1.5	Mapping.....	6
<b>2</b>	<b>Need for the planning proposal.....</b>	<b>11</b>
<b>3</b>	<b>Strategic assessment.....</b>	<b>12</b>
3.1	Regional Plan .....	12
3.2	Local .....	15
3.3	Section 9.1 Ministerial Directions .....	16
3.4	State environmental planning policies (SEPPs) .....	20
<b>4</b>	<b>Site-specific assessment .....</b>	<b>20</b>
4.1	Environmental.....	20
4.2	Social and economic .....	27
4.3	Infrastructure .....	28
<b>5</b>	<b>Consultation.....</b>	<b>30</b>
5.1	Community .....	30
5.2	Agencies.....	30
<b>6</b>	<b>Timeframe.....</b>	<b>30</b>
<b>7</b>	<b>Local plan-making authority.....</b>	<b>30</b>
<b>8</b>	<b>Assessment summary.....</b>	<b>31</b>
<b>9</b>	<b>Recommendation.....</b>	<b>31</b>
	<b>Appendix 1 The subject land .....</b>	<b>34</b>

**Table 1 Reports and plans supporting the proposal**

Relevant reports and plans
Planning Proposal – Coffs Harbour City Council, Renewal of the Argyll Estate Precinct, Argyll Estate, Coffs Harbour dated May 2022
Ordinary Council Report, 26 May 2022 – SC22/28: Planning Proposal – Argyll Estate Precinct Renewal – Pre-Exhibition
Ordinary Council Meeting Minutes, 26 May 2022 – SC22/28: Planning Proposal – Argyll Estate Precinct Renewal – Pre-Exhibition
Urban Design Report prepared by architectus dated 4 May 2022
Flood Risk Assessment prepared by Cardno dated 20 July 2021
Flood Impact Assessment prepared by Cardno (now Stantec) dated 4 May 2022
Strategic Bushfire Study prepared by Ecological Australia dated 4 May 2022
Flora and Fauna Assessment prepared by Ecological Australia dated 22 April 2022
Traffic and Transport Assessment prepared by GHD dated 4 May 2022
Road Traffic Noise Assessment prepared by SLR dated May 2022

# 1 Planning proposal

## 1.1 Overview

**Table 2 Planning proposal details**

<b>LGA</b>	<b>Coffs Harbour City</b>
<b>PPA</b>	Coffs Harbour City Council
<b>NAME</b>	Amend zoning and development standards to facilitate renewal of the Argyll Estate precinct, Coffs Harbour (263 additional homes)
<b>NUMBER</b>	PP-2022-1968
<b>LEP TO BE AMENDED</b>	Coffs Harbour LEP 2013
<b>ADDRESS</b>	197 allotments within the Argyll Estate Precinct, Coffs Harbour, listed in Appendix 1
<b>DESCRIPTION</b>	197 allotments within the Argyll Estate Precinct, Coffs Harbour, listed in Appendix 1
<b>RECEIVED</b>	30/05/2022
<b>FILE NO.</b>	IRF22/1925
<b>POLITICAL DONATIONS</b>	There are no donations or gifts to disclose and a political donation disclosure is not required
<b>LOBBYIST CODE OF CONDUCT</b>	There have been no meetings or communications with registered lobbyists with respect to this proposal

## 1.2 Objectives of planning proposal

The planning proposal contains objectives and intended outcomes that adequately explain the intent of the proposal.

The objective of the planning proposal is to amend the Coffs Harbour LEP 2013 to facilitate the redevelopment of the Argyll Estate precinct for a range of medium density dwelling types, including residential flat buildings of up to four storeys and dual occupancies.

This proposed planning mechanisms to achieve the intended outcomes are:

- amend the Land Zoning (LZN) Map to rezone 49 allotments from R2 Low Density Residential to R3 Medium Density Residential, being land west of Bradley Street between Kurrajong and Argyll Streets;
- amend the Lot Size (LSZ) Map to introduce a minimum lot size of 1,200 square metres for land zoned R3 Medium Density Residential;
- amend the Height of Building (HOB) Map to introduce a maximum HOB of 15.5 metres for land zoned R3 Medium Density Residential;
- amend the Key Sites Map to identify the Argyll Street precinct; and

- amend Clause 4.1B to remove the minimum lot size requirement for the construction of dual occupancies within the Argyll Street precinct.

The planning proposal indicates due to various constraints that the construction of dual occupancies will be limited to only certain areas of the estate. The proposed Key Sites Map however identifies the entire Argyll Street precinct and will remove the existing minimum lot size requirement for dual occupancies across the entire estate. Prior to public exhibition the Key Sites Map should be amended to illustrate only those allotments that have been identified as being capable of supporting dual occupancy development (i.e. where clause 4.1B(2) of the Coffs Harbour LEP 2013 does not apply) consistent with the 'Renewal areas plan' on page 35 of the Urban Design Report.

The planning proposal notes that Clause 5.22 Special flood considerations of the Standard Instrument LEP will be applied to the precinct. It is noted that Council resolved at its meeting on 28 October 2021 to 'opt-in' to Clause 5.22 being introduced into the Coffs Harbour LEP 2013 by DPE via an amending SEPP. The Department's policy team have advised that it is anticipated that the Explanation of Intended Effect will be placed on public exhibition in June/July 2022 for a four-week period, after which a SEPP will be drafted and made. Prior to public exhibition, the planning proposal is to be amended to clarify that inclusion of Clause 5.22 in the Coffs Harbour LEP 2013 will be completed as part of a separate process unless that process is delayed. In that situation Clause 5.22 will be introduced via this planning proposal.

The planning proposal also indicates an intention to create a Special Flood Considerations map identifying the Argyll Street precinct to accompany Clause 5.22 of the LEP. Clause 5.22 is a standard clause that cannot be modified and does not reference an accompanying LEP map. The planning proposal should be amended prior to community consultation to clarify that any Special Flood Considerations map will sit alongside existing flood mapping outside of the LEP.

The explanation of provisions detailed on page 19 of Council's planning proposal states that a maximum height of buildings of 8.5 metres will apply to land in Zone R3. However, the proposed height of buildings map on page 35 indicates that a 15.5 metre maximum height of buildings will apply. The planning proposal will need to be amended prior to community consultation to clarify that a proposed 15.5 metre maximum height of building will apply to land zoned R3 Medium Density.

The objectives of this planning proposal are clear and adequate.

## 1.3 Explanation of provisions

The planning proposal seeks to amend the Coffs Harbour LEP 2013 per the changes below:

**Table 3 Current and proposed controls**

Control	Current	Proposed
Zone	R2 Low Density Residential	Part R3 Medium Density Residential
Minimum lot size	400 square metres	1,200 square metres for land zoned R3 Medium Density
Maximum height of building	8.5m	15.5m for land zoned R3 Medium Density
Key Sites map		Amend to identify the Argyll Street precinct

Clause 4.1B		Include an additional provision (Clause 4.1B(4)) stating that Clause 4.1B (2) does not apply to the Argyll Estate precinct as demonstrated on the Key Sites map, thereby removing the minimum lot size requirement for the construction of dual occupancies within the precinct
Number of dwellings	197	263 additional dwellings

Council proposes to include site-specific controls for the Argyll Street precinct via an amendment to the Coffs Harbour Development Control Plan 2015. It is anticipated that the amendment will include:

- a structure plan for the site detailing indicative future development;
- removal of the application of dwelling density requirements and inclusion of additional controls for dual occupancy development;
- additional controls for residential flat building development;
- controls to achieve built form that responds to local character and climate;
- requirements to manage flood hazard and ensure safe flood evacuation. It is noted that some areas will be required to design development to maintain an overland flow path.

Council also proposes the preparation of a draft contributions plan to identify required infrastructure upgrades (including footpaths, upgraded open space and planting of street trees) as well as infrastructure costings and development contribution arrangements.

The planning proposal contains an explanation of provisions that adequately explains how the objectives of the proposal will be achieved.

## 1.4 Site description and surrounding area

The subject site includes approximately 19 hectares of land in Coffs Harbour, bounded by commercial uses which front the Pacific Highway to the east, Bray Street to the north, riparian corridors to the north and south and wider low density residential areas to the west.

The area comprises 197 allotments (listed in Appendix 1). Land and Housing Corporation own 118, the Aboriginal Housing Office own 11, and 68 are privately-owned.

There are a number of public reserves within the precinct including those along the northern and southern edges of the site which accommodate two creeks. The only formally developed open space is the local park located between Argyll Street and Kurrajong which features play equipment, picnic tables and tree planting.

The strategic context of the subject land is depicted in Figure 1, while Figure 2 details the extent of the precinct.





Figure 1 - Strategic context of the Argyll Street precinct (Source: Urban Design Report, Architectus)



Figure 2 - Argyll Estate Precinct (Source: Urban Design Report, Architectus)



Argyll and Kurrajong Streets provide east-west travel routes through the precinct, and with a number of north-south orientated streets, form a grid network which connects to Bray Street in the north and the Pacific Highway to the east. A number of cul-de-sacs terminate to the south of the site at a public reserve that accommodates Treefern Creek. This reserve and creek forms a barrier to the south. Three existing creek crossings do provide pedestrian access to the south.

Lot sizes within the precinct range from 580 square metres to 1,025 square metres. Single dwelling houses are the primary typology within the precinct.

The precinct is affected by a number of constraints which have determined the areas within the precinct identified for renewal. Constraints are depicted in Figure 3 and include:

- flooding
- bushfire
- biodiversity
- coastal use and coastal environment area
- acid sulfate soils.



**Figure 3 - Combined constraints map (Source: Urban Design Report, Architectus)**

The following principles have been adopted by the planning proposal (Figure 4):

- areas that have combined flooding, bushfire and ecological constraints are not recommended for density increases. Future development would be limited to renewal of existing single dwellings;
- areas which have a flood depth of generally greater than 1.5m during the probable maximum flood (PMF) are not suitable for redevelopment as it is proposed that floor levels be required to be above the PMF to support a shelter in place strategy;
- land between Kurrajong Street and Argyll Street to the west of Bradley Street is least affected by flooding, bushfire and ecological constraints. This area is considered most suitable for increased density such as apartment buildings of up to four storeys and dual occupancies; and

- the areas along Bray Street which interface with low density neighbourhoods and other land south of Argyll Street that is not highly constrained is suitable for a moderate increase in dwelling density, such as dual occupancies.



**Figure 4 - Renewal plan (Source: Urban Design Report, Architectus)**

## 1.5 Mapping

The planning proposal includes mapping showing the proposed changes to the Coffs Harbour LEP 2013 maps, which are suitable for community consultation.



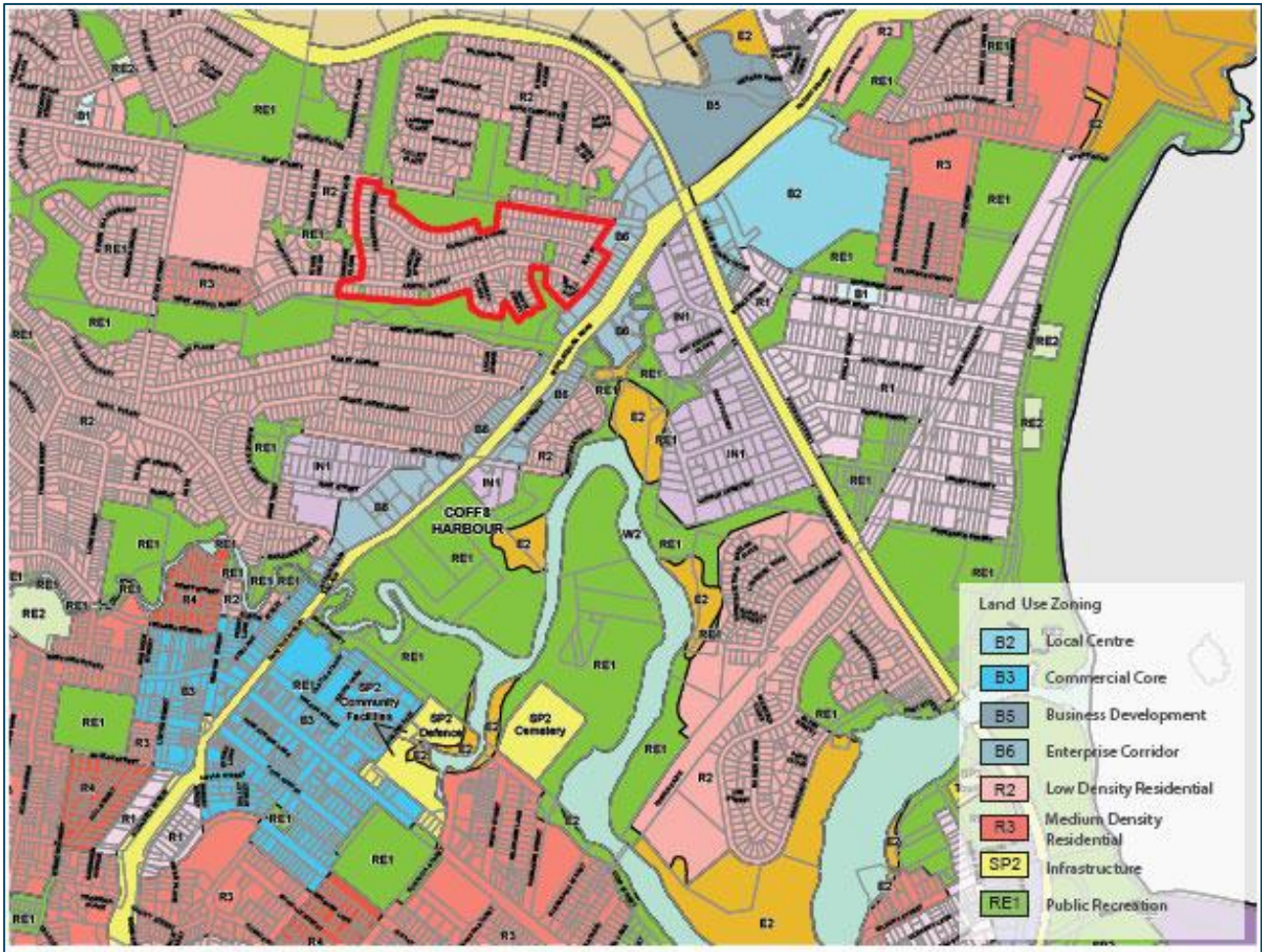


Figure 5 - Existing land zoning map (Source: Planning Proposal)



Figure 6 - Proposal land zoning map (Source: Planning Proposal)



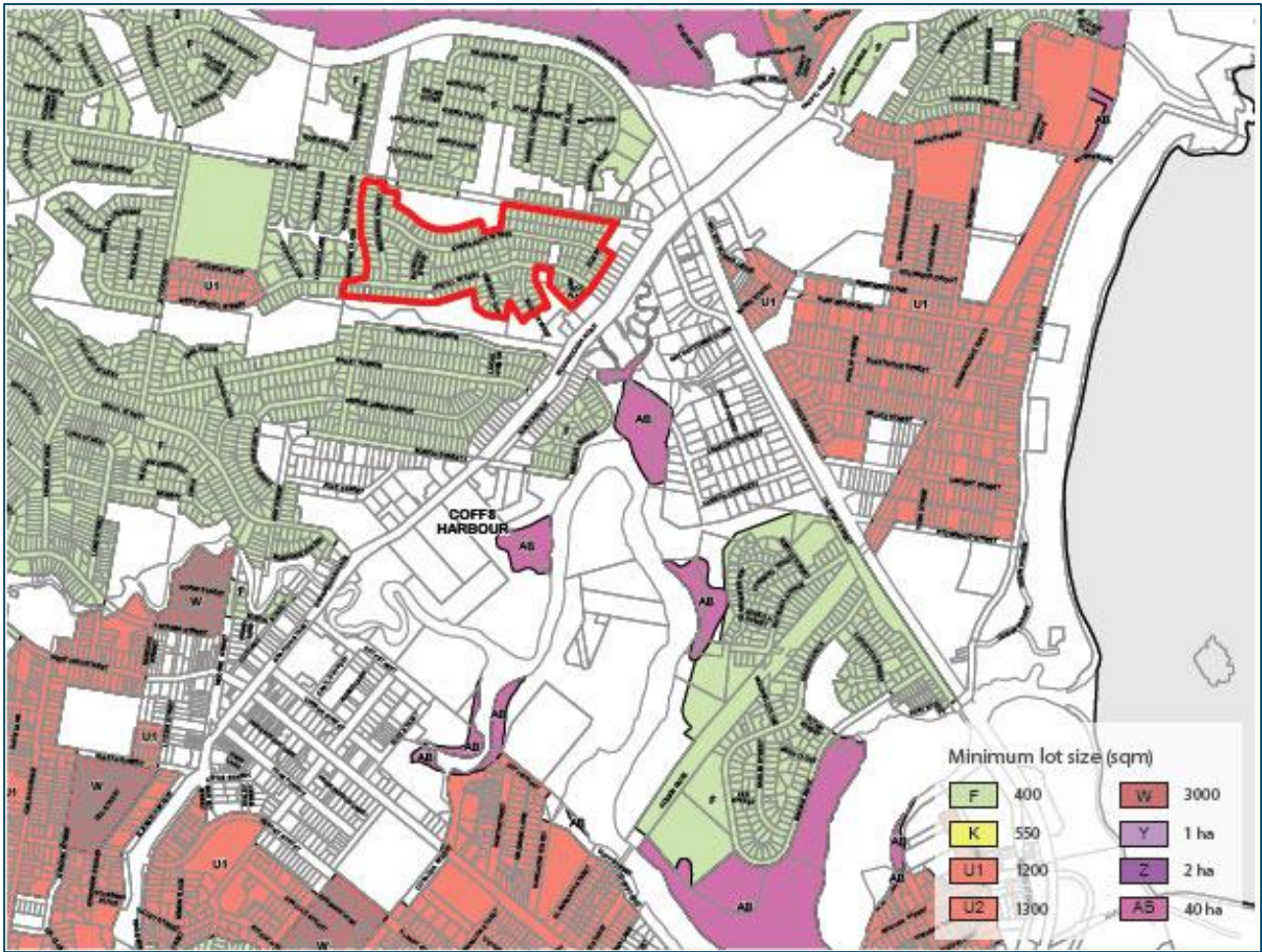


Figure 7 - Existing minimum lot size map (Source: Planning Proposal)



Figure 8 - Proposed minimum lot size map (Source: Planning Proposal)



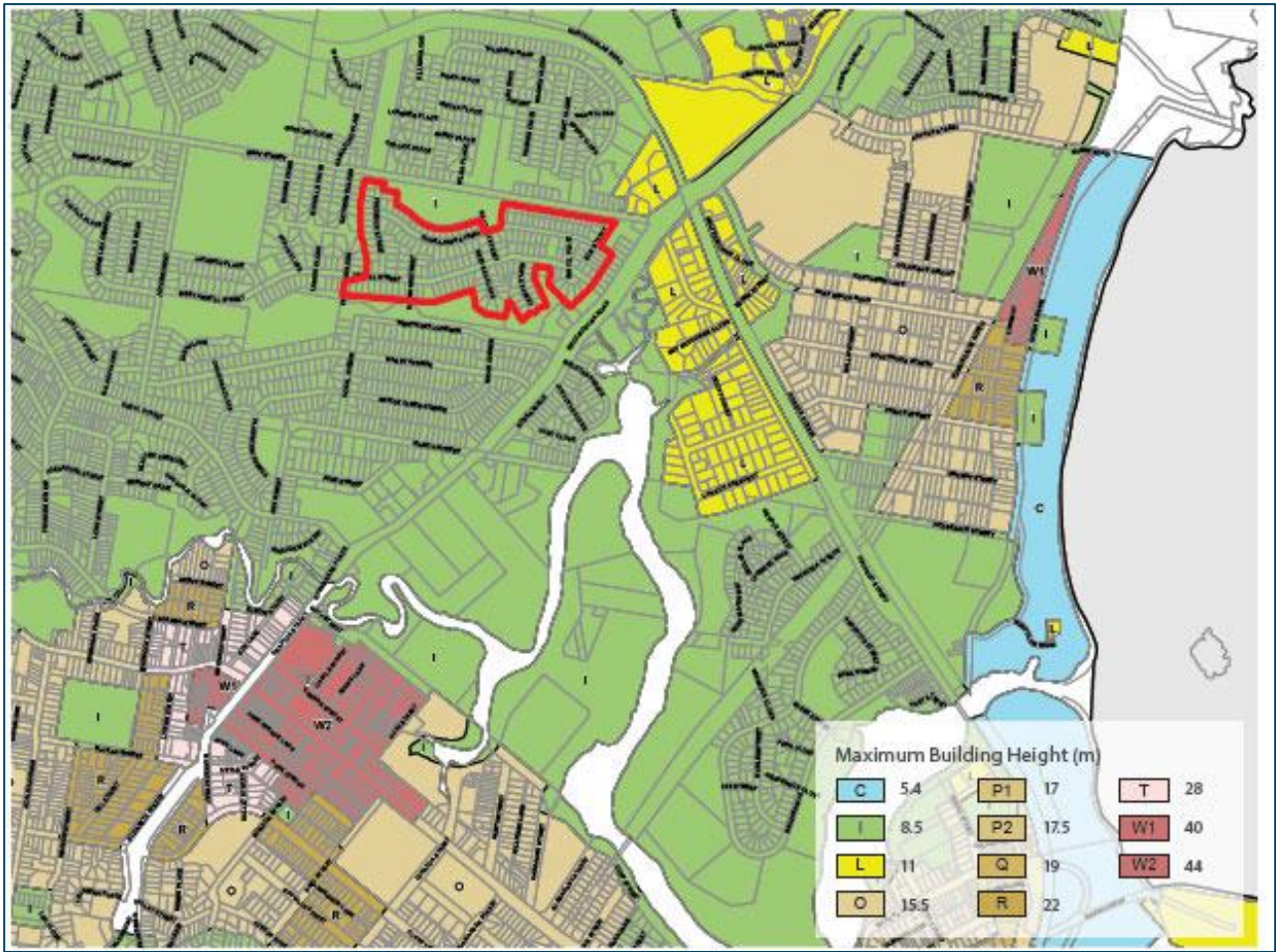
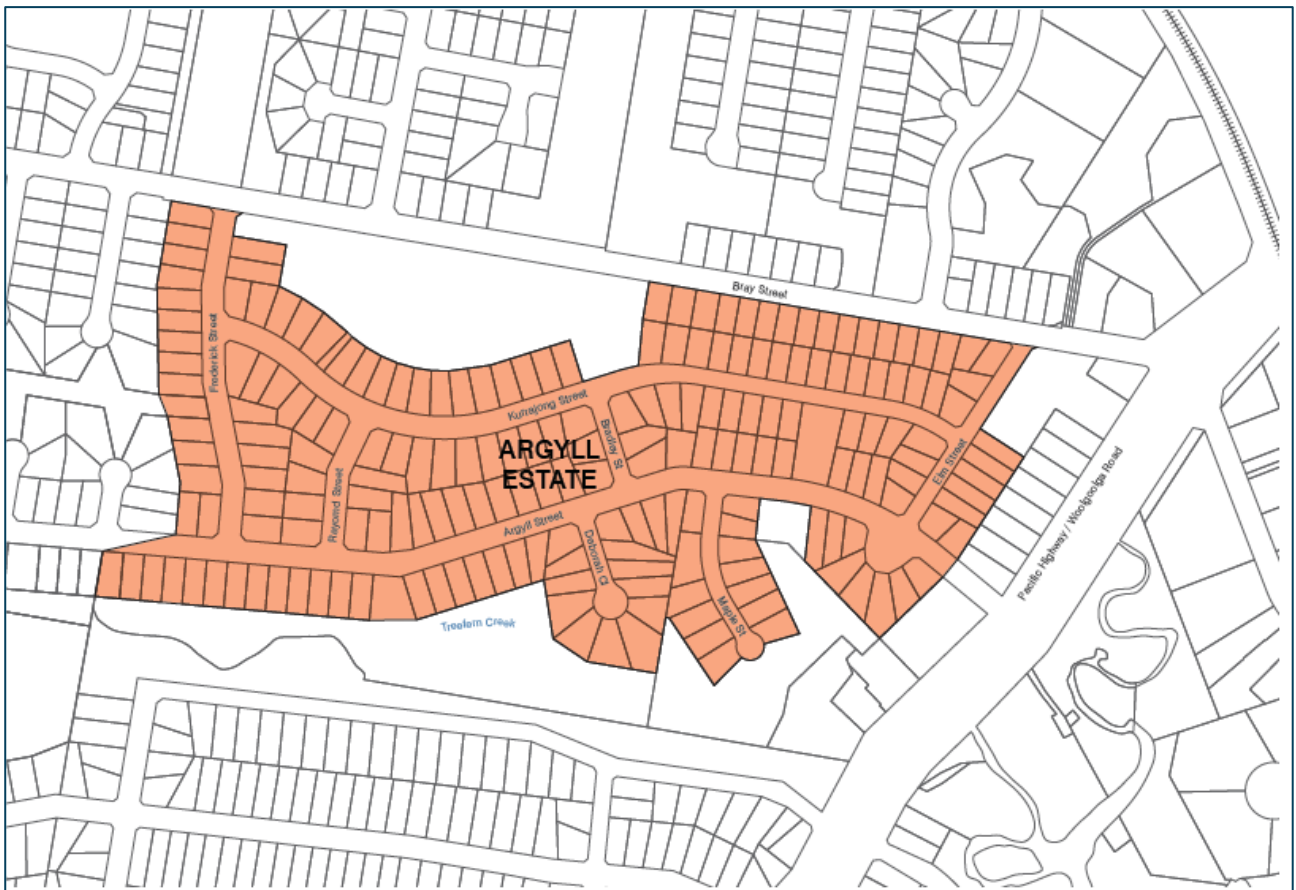


Figure 9 - Existing height of buildings map (Source: Planning Proposal)



Figure 10 - Proposed height of buildings map (Source: Planning Proposal)





**Figure 11 - Proposed key sites map (Source: Planning Proposal)**

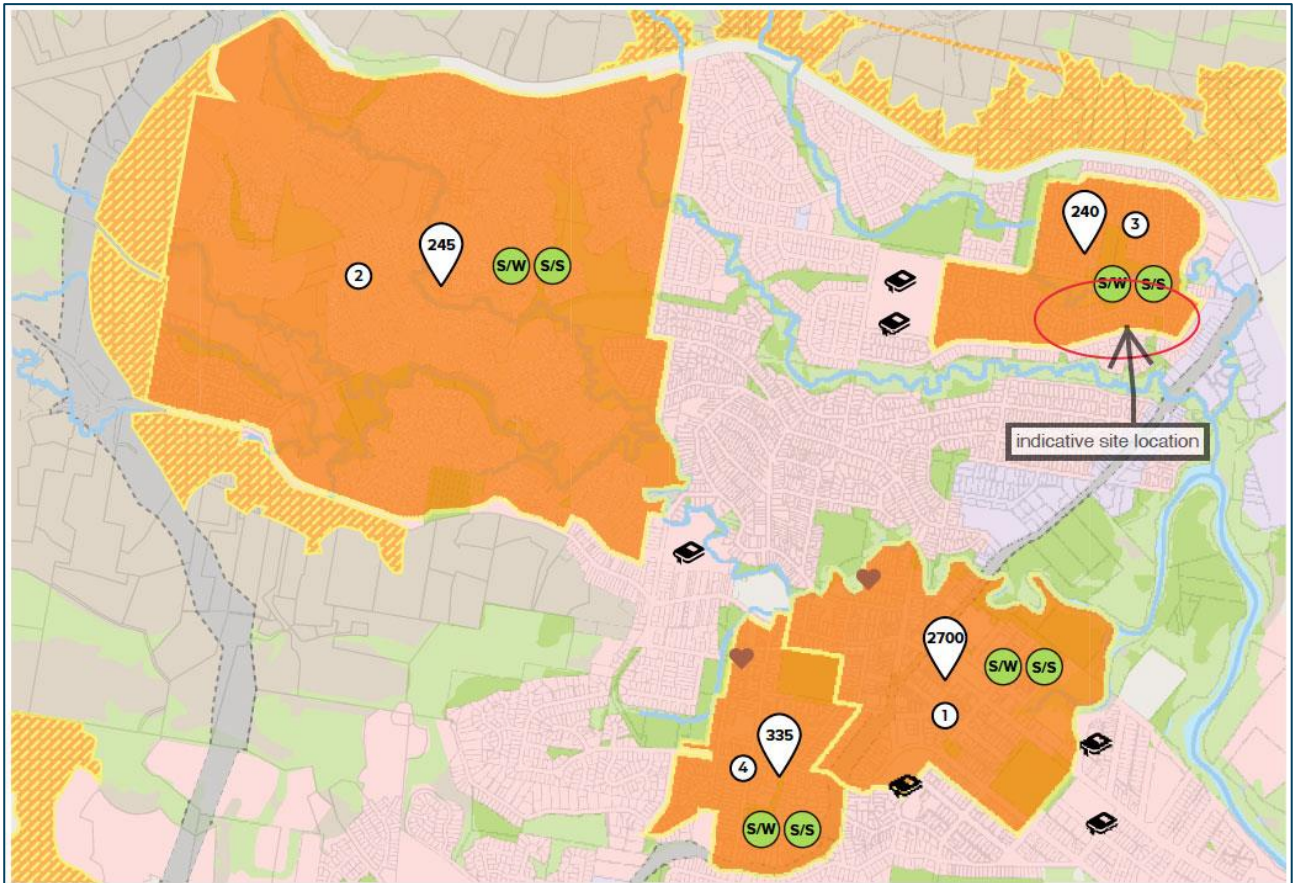
Prior to public exhibition, the Key Sites Map is to be amended to detail only those allotments that have been identified as being capable of supporting dual occupancy development (i.e. where clause 4.1B of the Coffs Harbour LEP 2013 does not apply). It is expected that the map will exclude the areas impacted by combined flooding, bushfire and ecological constraints, as well as the 'Elm Street – localised area impacted by greater flood depths', as detailed by the 'Renewal areas plan' on page 35 of the Urban Design Report (included as Figure 12 below).



**Figure 12 - Renewal areas plan (Source: Urban Design Report, Architectus)**

## 2 Need for the planning proposal

The Argyll Street precinct is identified by Chapter 4 of the Coffs Harbour Local Growth Management Strategy 2020 (LGMS) as being suitable to deliver infill renewal housing. The precinct is located within the West and Central Coffs (Bray Street) Infill Area which is identified as having potential to accommodate approximately 240 new dwellings (Figure 13).



**Figure 13 - Identification of the subject land in the Coffs Harbour LGMS as being suitable for infill development (Source: Planning Proposal)**

The proposal is also consistent with the *NSW Government's Future Directions for Social Housing Strategy* which was released in 2016. Action 1.1 is to 'Increase redevelopment of Land and Housing Corporation properties to renew and grow supply'. This provides a clear directive and strategic justification for the NSW Government to redevelop land to deliver new social housing.

The planning proposal is the best means of achieving the objectives and intended outcomes.

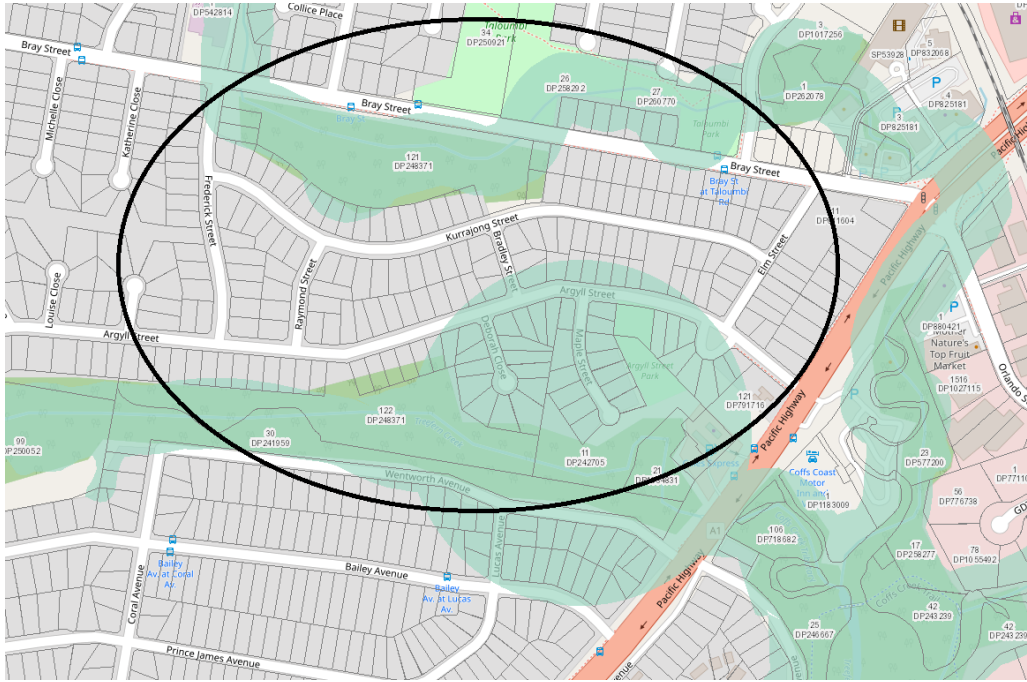
## 3 Strategic assessment

### 3.1 Regional Plan

The following table provides an assessment of the planning proposal against relevant aspects of the North Coast Regional Plan.



Table 4 Regional Plan assessment

Regional Plan Objectives	Justification
Direction 1 - Deliver environmentally sustainable growth	<p>This direction aims to manage growth to protect the conservation and economic value of important coastal landscapes and the natural environment. Directing future growth to locations that can sustain additional development, and are readily serviced, will deliver sustainable growth across the region and help protect the environment.</p> <p>The subject land is located within an existing urban area and has been identified by the LGMS as being capable of accommodating infill development.</p>
Direction 2 - Enhance biodiversity, coastal and aquatic habitats, and water catchments	<p>This direction advocates for development to be appropriately located to limit any adverse impact on the region's biodiversity and water catchments. The direction requires development to be focused to areas of least biodiversity sensitivity in the region and the implementation of the 'avoid, minimise, offset' hierarchy to biodiversity, including areas of high environmental value (HEV).</p> <p>The subject land contains areas of potential HEV as depicted by Figure 14, below.</p>  <p><b>Figure 14 - High environmental value land within the subject site</b></p> <p>Consultation with the NSW Department of Planning and Environment – Biodiversity Conservation Division (BCD) will be required.</p>
Direction 3 - Manage natural hazards and climate change	<p>This direction acknowledges natural hazards that may impact land on the North Coast and aims to reduce the risk from such hazards.</p> <p>The subject land is affected by a number of hazards, including flooding, bushfire and acid sulfate soils. Sufficient information has been submitted with the planning proposal to indicate that these hazards are capable of being addressed at the development application stage subject to agency confirmation during the planning process consultation process.</p>

Direction 14 - Provide great places to live and work	<p>This direction highlights the importance of precinct planning, delivered in accordance with the Precinct Plan Guidelines included as Appendix C to the Regional Plan.</p> <p>The planning proposal is supported by an Urban Design Report which considers the matters detailed in Appendix C.</p>
Direction 15 - Develop healthy, safe, socially engaged and well-connected communities	<p>This direction aims to design the urban environment to help build community health, social wellbeing and cohesion.</p> <p>The planning proposal aims to provide additional housing opportunities in proximity to services and facilities.</p>
Direction 16 - Collaborate and partner with Aboriginal communities	<p>This direction states that consultation on future land use planning should ensure that Aboriginal people have their interests and responsibilities acknowledged, respected and considered.</p> <p>Council has undertaken consultation with the local Aboriginal community regarding the proposal, including:</p> <ul style="list-style-type: none"> <li>• Aboriginal Housing Office</li> <li>• Coffs Harbour and District Local Aboriginal Land Council</li> <li>• Council's Yandaarra Aboriginal Advisory Committee</li> <li>• Garlambirla Guuyu-Girwaa Elders' Group</li> </ul> <p>While Council has undertaken initial consultation with the local Aboriginal community regarding the proposal, it is considered appropriate that formal consultation be undertaken with the Local Aboriginal Land Council during the public exhibition stage in relation to this direction. A condition has been included as part of the Gateway determination to this effect.</p>
Direction 18 - Respect and protect the North Coast's Aboriginal Heritage	<p>This direction aims to avoid harm to Aboriginal objects and places, or areas of significance to Aboriginal people.</p> <p>While Council has undertaken initial consultation with the local Aboriginal community regarding the proposal, it is considered appropriate that formal consultation be undertaken with the Local Aboriginal Land Council during the public exhibition stage in relation to this direction. A condition has been included as part of the Gateway determination to this effect.</p>
Direction 21 - Coordinate local infrastructure delivery	<p>This direction highlights the importance of coordinated local infrastructure delivery.</p> <p>The planning proposal constitutes infill development and as such, it maximises the efficient use of existing infrastructure in accordance with the intent of this direction.</p>
Direction 23 - Increase housing diversity and choice	<p>This direction advocates the provision of housing diversity and choice to improve affordability, help meet the needs of an ageing population and support the reduction of household size.</p> <p>The planning proposal aims to facilitate residential flat buildings and dual occupancies in the Coffs Harbour local government area to support the changing population and dwelling needs.</p>



Direction 25 -  
Deliver more  
opportunities  
for affordable  
housing

This direction acknowledges that the North Coast has a high proportion of low income earners and that housing in many areas is less affordable than the State average.

The intent of the planning proposal is to facilitate redevelopment of the Argyll Estate precinct for a range of medium density dwelling types, including residential flat buildings of up to four storeys and dual occupancies. It is noted that some of these dwelling types may be provided via private investment in social and affordable housing.

## 3.2 Local

The proposal states that it is consistent with the following local plans and endorsed strategies. It is also consistent with the strategic direction and objectives, as stated in the table below:

**Table 5 Local strategic planning assessment**

Local Strategies	Justification
Coffs Harbour Regional City Action Plan 2036 (RCAP)	<p>The RCAP was developed by the NSW Government in collaboration with Coffs Harbour City Council to manage and shape the city's growth to 2036.</p> <p>The planning proposal is consistent with Objective 17 of the RCAP, which aims to deliver a city that promotes a sustainable growth footprint and offers housing choice. Infill development is supported, together with low-rise medium density housing opportunities that maintain the scale and character of existing neighbourhoods while providing a greater variety and supply of affordable housing.</p> <p>Areas of social housing that are capable of being renewed and with good access to services, transport and jobs are specifically identified by the RCAP as being appropriate for consideration for low-rise medium density housing opportunities.</p>
Coffs Harbour Local Growth Management Strategy 2020 (LGMS)	<p>Chapter 4 of the LGMS was endorsed by DPE in January 2020 and adopts a 'compact city' program that directs infill development into appropriate locations in the local government area. These locations have been planned to avoid environmental and other constraints, to provide a good land use mix and high connectivity to services, and to encourage more active living.</p> <p>As outlined in Section 2 of this report, the Argyll Street precinct is located within the West and Central Coffs (Bray Street) Infill Area of the LGMS and is identified as being suitable to deliver infill renewal housing (Figure 13). Adequate sewer and water servicing capacity is available to accommodate approximately 240 new dwellings. Council has advised that it has undertaken a subsequent more detailed review of sewer and water infrastructure in the area and that adequate capacity exists to accommodate the additional 263 dwellings anticipated by this planning proposal.</p> <p>The planning proposal considers the key principles for the West and Central Coffs Infill Area, being:</p> <ul style="list-style-type: none"> <li>• deliver housing diversity and choice;</li> <li>• deliver high quality infill and renewal development to reinforce a sense of place;</li> <li>• support economic and social functions of centres.</li> </ul>


	<p>Chapter 7 of the LGMS constitutes a housing strategy for the Coffs Harbour local government area and was endorsed by DPE in December 2020. It is noted that the planning proposal states that this Chapter has not been endorsed by DPE. This should be updated prior to exhibition.</p> <p>Chapter 7 aims to facilitate the delivery of a greater housing supply, increase housing diversity and choice, and encourage opportunities for affordable housing for the region's changing population. The proposal is consistent with the following Actions:</p> <p><i>1: Implement the Compact City by facilitating infill development</i></p> <p><i>4: Encourage housing diversity and choice to address changing needs</i></p> <p><i>6: Address and influence housing affordability</i></p> <p>The proposal is consistent with the high priority action to review the minimum lot size applicable to dual occupancies in Zone R2 Low Density Residential to facilitate infill development.</p>
Local Strategic Planning Statement (LSPS)	<p>The LSPS supports Council's compact city program as outlined within the LGMS. The planning proposal is broadly consistent with the following priorities:</p> <p><i>P1. Deliver and implement the Compact City Program Key Priorities</i></p> <p><i>P5. Deliver greater housing supply, choice and diversity</i></p> <p><i>P7. Protect and conserve the natural, rural, built and heritage culture of Coffs Harbour</i></p> <p>Specifically, the planning proposal is consistent with the following actions:</p> <p><i>A5.1 Review and amend Council's local planning controls relating to housing supply, choice and diversity as outlined in the Local Growth Management Strategy</i></p> <p><i>A5.4 Work with housing providers to investigate renewal opportunities for social housing within the LGA in consultation with key stakeholders.</i></p>
My Coffs Community Strategic Plan (CSP)	<p>The CSP is a whole-of-community plan that sets out the long-term aspirations of the Coffs Harbour community. The planning proposal is consistent with the following objective:</p> <p><i>C1.2 We undertake development that is environmentally, socially and economically responsible</i></p> <p>The CSP states that an increase in new dwellings on urban infill sites is a measure of success in the achievement of the abovementioned objective.</p>

### 3.3 Section 9.1 Ministerial Directions


The planning proposal's consistency with relevant section 9.1 Directions is discussed below:

Table 6 Section 9.1 Ministerial Direction assessment

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
1.1 Implementation of Regional Plans	Unresolved	<p>The objective of this direction is to give legal effect to the vision, land use strategy, goals, directions and actions contained in Regional Plans.</p> <p>As discussed in Section 3.1 of this report, the proposal requires consultation with government agencies to address matters pertaining to:</p> <ul style="list-style-type: none"> <li>• high environmental value land;</li> <li>• flooding;</li> <li>• Aboriginal objects and places, or areas of significance to Aboriginal people.</li> </ul> <p>The proposal is inconsistent with the North Coast Regional Plan 2036 as it may permit an intensification of development on land that has some of the above values. It is considered appropriate that consistency with this direction remain unresolved until consultation is undertaken with BCD, Flood Management Division and the Local Aboriginal Land Council.</p>
1.4 Site Specific Provisions	Justifiably inconsistent	<p>The planning proposal is inconsistent with this direction as it proposes to remove the minimum lot size requirement for the construction of dual occupancies within the Argyll Street precinct via an amendment to Clause 4.1B of the LEP.</p> <p>The inconsistency is considered to be of minor significance as the proposal will amend an existing local clause and permit an increase in development potential.</p>
3.2 Heritage Conservation	Justifiably inconsistent	<p>This direction states that a planning proposal must contain provisions that facilitate the conservation of heritage and Aboriginal cultural significance.</p> <p>The inconsistency is considered to be of minor significance as the planning proposal does not alter the existing conservation measures of heritage and Aboriginal cultural significance on the subject land.</p>
4.1 Flooding	Unresolved	<p>This direction applies to a planning proposal that creates, removes or alters a zone or provisions that affects flood prone land.</p> <p>The planning proposal is supported by a Flood Risk Assessment and Flood Impact Assessment which consider the principles of the 2005 Floodplain Development Manual and DPE 2021 Flood Prone Land Package.</p> <p>The Risk Assessment includes a specific assessment against the provisions of this direction and notes that the proposal is inconsistent with parts 3(d) and 4(c) as it will permit an increase in dwelling density in the flood planning area as well as on land between the flood planning level and the probable maximum flood (PMF) level. However, the assessment concludes that the planning proposal complies with the intent of the direction and that any provisions that are inconsistent are of minor significance, in part due to the proposed requirement to construct the floor level of dwellings above the PMF level.</p>

Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
		This matter will remain unresolved until formal consultation with NSW Department of Planning and Environment – Floodplain Management Division has been undertaken and a full assessment regarding the appropriateness of the proposal to require the construction of dwellings above the PMF level has been completed.
4.2 Coastal Management	Consistent	<p>A number of allotments within the precinct are within the 'coastal use area' and 'coastal environment area' as detailed in SEPP (Resilience and Hazards) 2021. A portion of the proposed R3 Medium Residential Zone is within the coastal environment area.</p>  <p><b>Coastal Management SEPP</b></p> <ul style="list-style-type: none"> <li>Study Area</li> <li>Coastal Management SEPP</li> <li>Land Application Map</li> <li>Coastal Wetlands</li> <li>Coastal Wetlands Proximity Area</li> <li>Coastal Environment Area Map</li> <li>Coastal Use Area Map</li> </ul> <p>Scale: 0 100 200 400 Meters</p> <p>Source: Service Level Outline © Department of Customer Service 2020</p> <p>eco logical A TERRA TECH COMPANY</p> <p><b>Figure 15 - Coastal Management SEPP (Source: Flora and Fauna Assessment, Ecological)</b></p> <p>The planning proposal considers the objects of the <i>Coastal Management Act 2016</i> as well as relevant guidelines</p>
4.3 Planning for Bushfire Protection	Unresolved	<p>This direction is relevant to the proposal as the application affects or is in proximity to land mapped as bushfire prone.</p> <p>The direction provides that Council must consult with the Commissioner of the NSW Rural Fire Service (RFS) after a Gateway determination is issued and before community consultation is undertaken. Until consultation has been undertaken, the direction remains unresolved.</p>



Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
4.5 Acid Sulfate Soils	Justifiably inconsistent	<p>The land subject to this planning proposal has the potential to be affected by acid sulfate soils (Figure 16).</p> <p>The planning proposal is inconsistent with this direction as it enables intensification of land use on acid sulfate soils and the proposal is not supported by an acid sulfate soils study.</p> <p>The inconsistency is considered to be of minor significance in this instance. Coffs Harbour LEP 2013 contains suitable provisions (Clause 7.1) to ensure that this matter can be appropriately considered and addressed as part of any future development application.</p>  <p><b>Figure 16 – Acid sulfate soils map (Source: Coffs Harbour LEP 2013)</b></p>
5.1 Transport and Infrastructure	Unresolved	<p>This direction is relevant to the planning proposal as it will alter a zone and provisions relating to urban land.</p> <p>The proposal is inconsistent with the terms of this direction as it does not specifically consider <i>Improving Transport Choice – Guidelines for planning and development</i> (DUAP 2001) and <i>The Right Place for Business and Services – Planning Policy</i> (DUAP 2001).</p> <p>Although the proposal is supported by a Traffic and Transport Assessment which gives consideration to the objective of this direction, this matter will remain unresolved until consultation with Transport for NSW is undertaken.</p>



Directions	Consistent/ Not Applicable	Reasons for Consistency or Inconsistency
6.2 Caravan Parks and Manufactured Home Estates	Justifiably inconsistent	<p>The objectives of this direction are to provide for a variety of housing types and provide opportunities for caravan parks and manufactured home estates.</p> <p>The planning proposal is inconsistent with this direction as it does not retain provisions that permit development for the purposes of a caravan park to be carried out on land. Caravan parks are permitted with consent in zone R2 Low Density Residential but are prohibited in zone R3 Medium Density Residential pursuant to the provisions of the Coffs Harbour LEP 2013.</p> <p>The inconsistency is considered to be of minor significance as the planning proposal intends to provide a variety of housing types and will create opportunity for the construction of affordable housing in the local government area, the area being zoned R3 is only 19 hectares in size and large areas of land remain available for caravan parks across the LGA.</p>

### 3.4 State environmental planning policies (SEPPs)

The planning proposal is consistent with all relevant SEPPs. A number of SEPPs will be relevant to future development in the precinct and will require consideration at the development application stage, including but not limited to:

- SEPP (Biodiversity and Conservation) 2021 – Chapter 4 Koala Habitat Protection
- SEPP (Resilience and Hazards) 2021 – Chapter 2 Coastal Management
- SEPP (Resilience and Hazards) 2021 – Chapter 4 Remediation of Land

## 4 Site-specific assessment

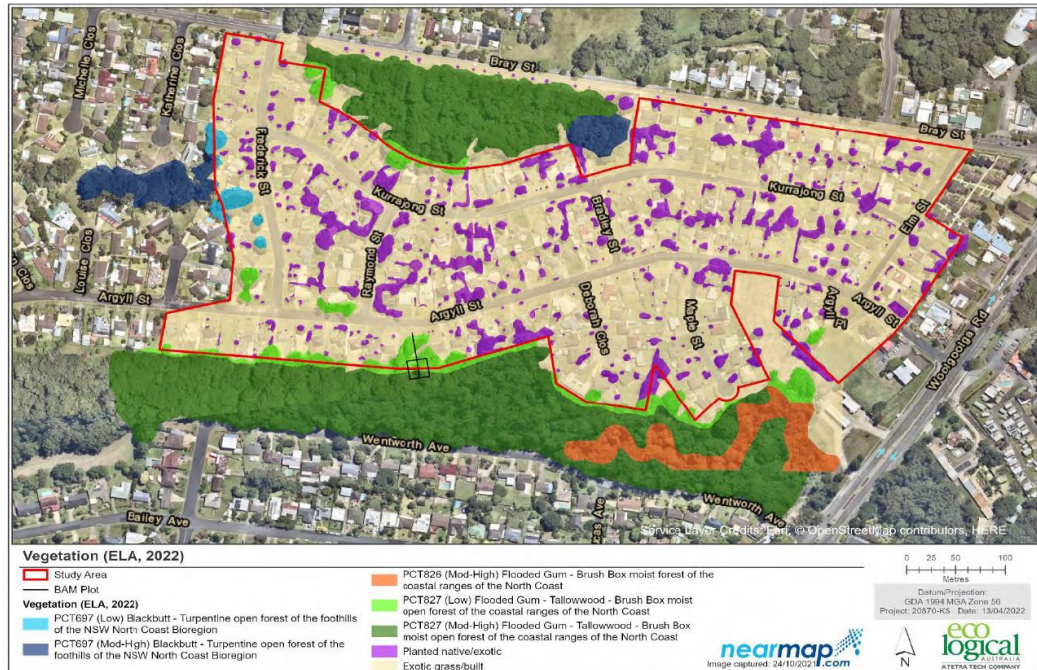
### 4.1 Environmental

The following table provides an assessment of the potential environmental impacts associated with the proposal.

**Table 7 Environmental impact assessment**

Environmental Impact	Assessment
Ecological	A Flora and Fauna Assessment has been completed for the subject land, describing the native vegetation, threatened species, populations and communities listed under the <i>NSW Biodiversity Conservation Act 2016</i> and <i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i> . The Flora and Fauna Assessment informed the proposed amendments.

The Flora and Fauna Assessment identifies that the majority of the land within the study area consists of buildings or exotic grass (15.92 hectares), planted native and exotic vegetation (2.68 hectares) with small areas of native vegetation in low condition (0.67 hectares). Within the area to be zoned R3, buildings or exotic grass comprise 3.43 hectares, planted native and exotic vegetation comprises 0.83 hectares and native vegetation comprises 0.13 hectares (Figure 17).

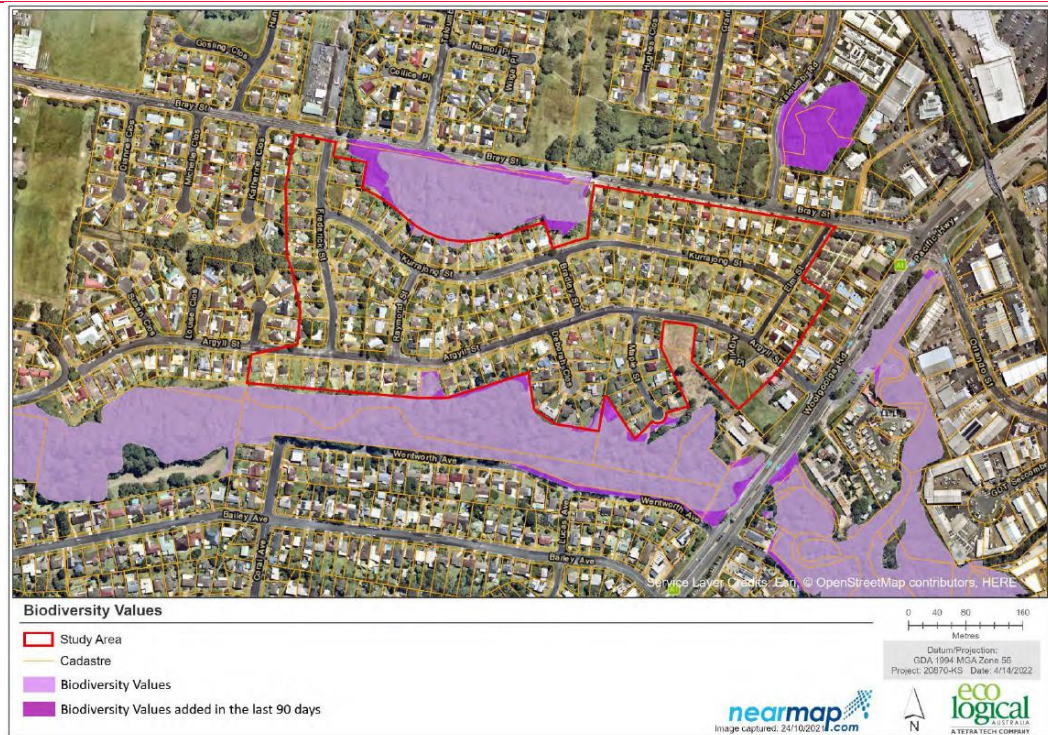


**Figure 17 - Vegetation mapping (Source: Flora and Fauna Assessment, Ecological)**

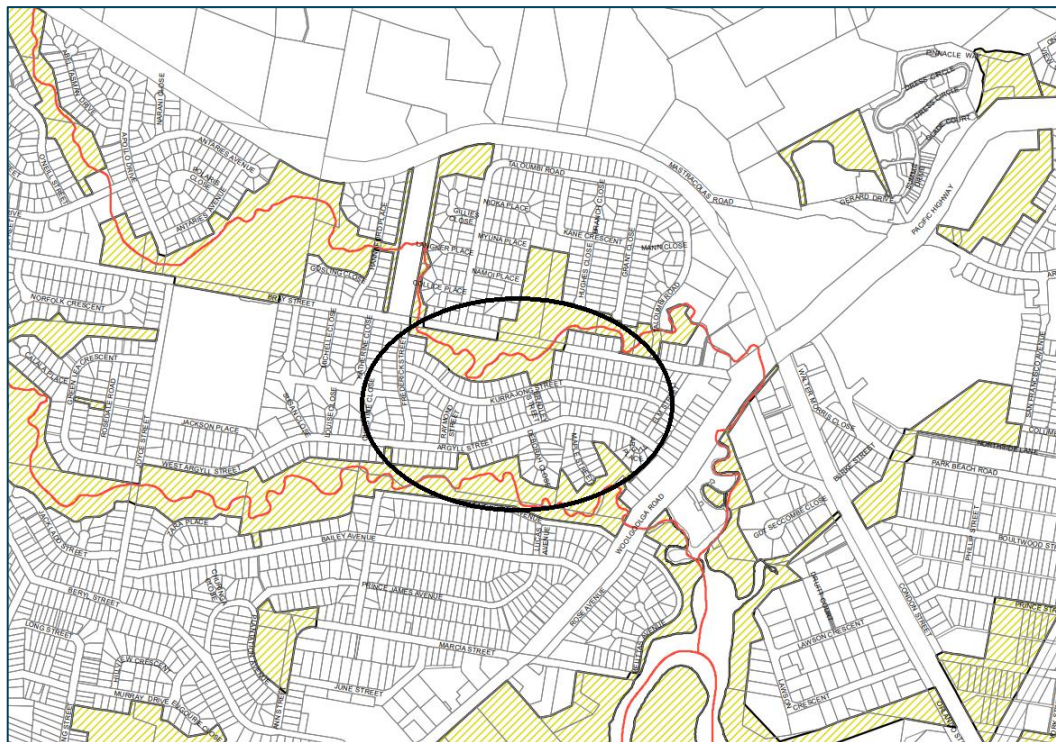
The Flora and Fauna Assessment mapped ecological values within and adjacent to the precinct with the most significant areas being located along the interface with the vegetated riparian corridors in the northern and southern parts of the precinct. Intact vegetation is predominantly external to the proposed development, including areas identified on the NSW Biodiversity Map (Figure 18) and the terrestrial biodiversity map adopted as part of the Coffs Harbour LEP 2013 (Figure 19).

No threatened ecological communities were found in the study area, nor were any hollow bearing trees located or threatened species observed during the field assessment.





**Figure 18 - Biodiversity values map (Source: Flora and Fauna Assessment, Ecological)**



**Figure 19 – Terrestrial biodiversity map (Source: Coffs Harbour LEP 2013)**

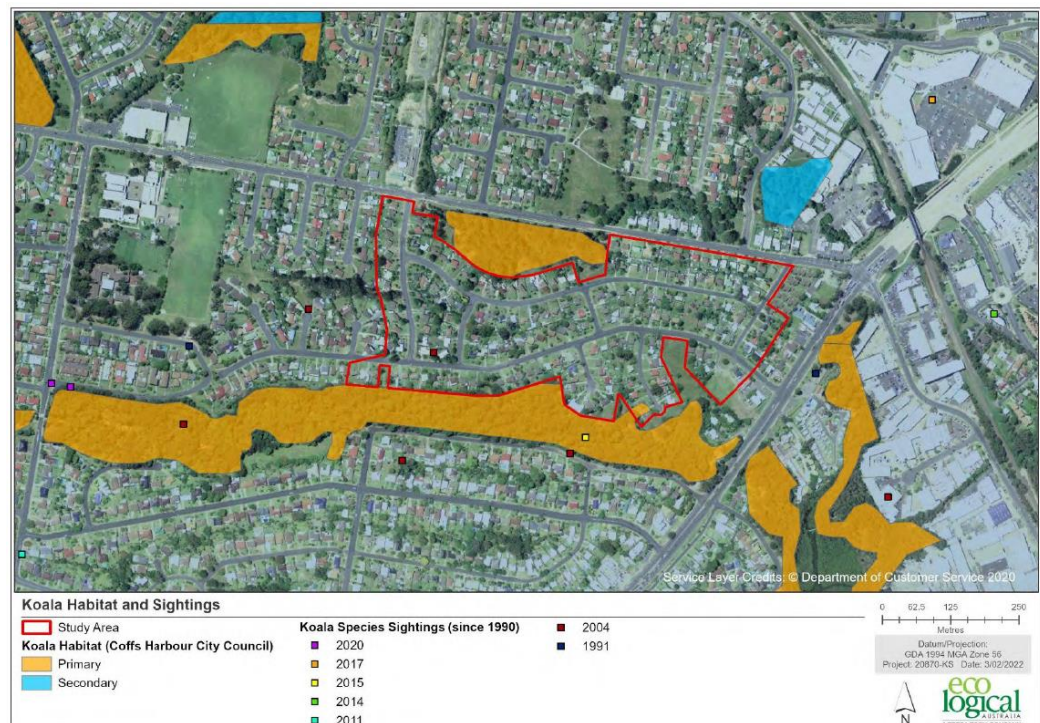
Important area mapping for the Swift Parrot occurs within the northern and southern vegetation adjacent to the study area as well as in small parts of the study area (Figure 20).





**Figure 20 - Swift Parrot habitat (Source: Flora and Fauna Assessment, Ecological)**

'Primary' koala habitat is mapped by the Coffs Harbour Comprehensive Koala Plan of Management as being within the northern and southern vegetation adjacent to the study area as well as in small parts of the study area (Figure 21).



**Figure 21 - Koala habitat (Source: Flora and Fauna Assessment, Ecological)**

Consultation with BCD will be required to confirm the suitability of the proposal.

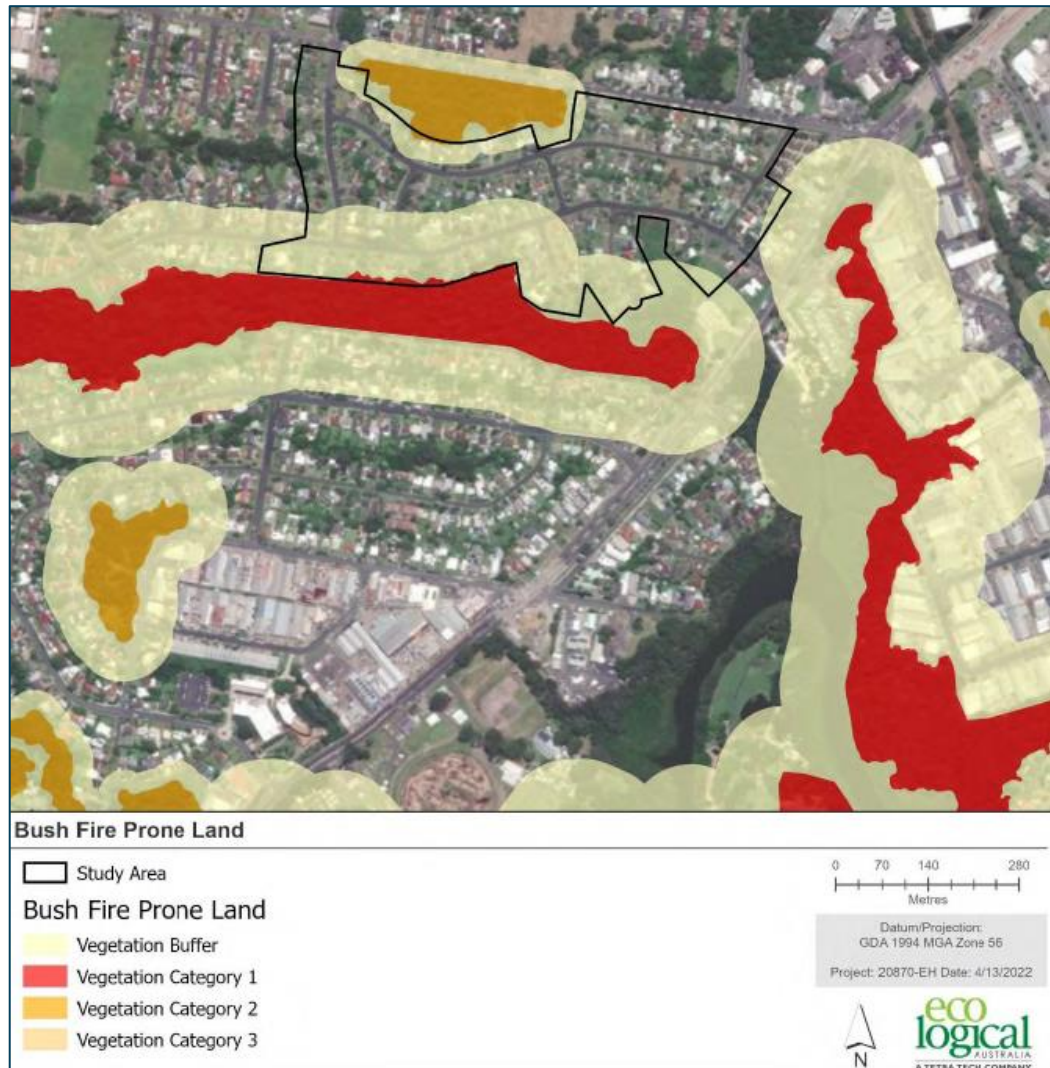
Environmental Impact	Assessment
Flooding	<p>The precinct is subject to inundation by flooding as a result of the two watercourses located to the north and south, as follows:</p> <ul style="list-style-type: none"> <li>• flooding during the 100-year Average Recurrence Interval (ARI) flood affecting parts of the site (Figure 22);</li> <li>• flooding during the Probable Maximum Flood (PMF) event affecting the majority of the site, with the exception of some lots fronting Fredrick Street at the western edge of the site (Figure 23);</li> <li>• limitations on evacuation from the area in certain flood events as a result of flooding of the road network including during the 100-year ARI flood event.</li> </ul> <div data-bbox="379 667 1433 1160"> <p><b>Legend - 1% AEP</b></p> <ul style="list-style-type: none"> <li>Argyll Estate Rezoning Investigation Area</li> <li>Flooding Investigation boundary</li> <li>1% AEP flood extent</li> <li>Flood depth &gt;0.5m Area with greater than 0.5m flood depth (1% AEP)</li> <li>Lots significantly impacted Over 50% of the lot area affected by a flood depth &gt;0.5m (1% AEP)</li> <li>Flood affected lots Lots that are impacted by the 1% AEP</li> <li>Lots minimally impacted Less than 15% of lot area affected by the 1% AEP</li> <li>Lots unaffected by 1% AEP</li> <li>Major break out zones and flood paths</li> <li>Streets impacted by flooding Streets impacted by heavy flooding of more than 0.3m (1% AEP) which constrains evacuation during a flood event</li> </ul> </div> <p><b>Figure 22 - 100-year ARI / 1% Annual Exceedance Probability (AEP) flood constraints map (Source: Urban Design Report, Architectus)</b></p> <div data-bbox="379 1279 1433 1738"> <p><b>Legend - PMF</b></p> <ul style="list-style-type: none"> <li>Argyll Estate Rezoning Investigation Area</li> <li>Flooding Investigation boundary</li> <li>PMF flood extent</li> <li>Flood depth &gt;1.5m Area with greater than 1.5m flood depth (PMF)</li> <li>Lots significantly impacted Over 50% of the lot area affected by a flood depth &gt;1.5m (PMF)</li> <li>Flood affected lots Lots that are impacted by the PMF</li> <li>Lots minimally impacted Less than 20% of lot area affected by the PMF</li> <li>Lots unaffected by flooding</li> <li>Streets impacted by flooding Streets impacted by heavy flooding of more than 0.3m (PMF) which constrains evacuation during a flood event</li> </ul> </div> <p><b>Figure 23 - PMF constraints map (Source: Urban Design Report, Architectus)</b></p>



Environmental Impact	Assessment
	<p>The planning proposal is supported by a Flood Risk Assessment and Flood Impact Assessment.</p> <p>The Argyll Estate precinct is subject to flash flooding with limited warning times. Given the flood affectation within the site and the potential issues around safe evacuation, the proposal manages flooding as follows:</p> <ul style="list-style-type: none"> <li>• areas proposed to be rezoned to R3 Medium Density Housing are limited to land between the flood planning area and the PMF, generally avoiding areas impacted by the 100-year flood level;</li> <li>• all future habitable floor levels will be raised above the PMF level to ensure that residents can shelter-in-place during all flood events up to the probable maximum flood level;</li> <li>• dual occupancies will be limited to areas where the habitable ground floor level would not need to be raised by more than around 1.5m to be above the probable maximum flood level.</li> </ul> <p>The NSW Government Policy Considering Flooding in Land Use Planning (DPE July 2021) allows for the implementation of special flood considerations in areas outside the flood planning area (but below the PMF level) on land that, in the event of a flood, may cause a particular risk to life and require the evacuation of people. Such considerations may apply where vertical evacuation for short duration flooding is required, for example in the scenario where the rate of rise of floodwater prohibits safe evacuation from the land.</p> <p>Accordingly, Clause 5.22 'Special flood considerations' will apply to the site, to enable controls to apply up to the PMF level. It is noted that inclusion of Clause 5.22 in the Coffs Harbour LEP 2013 will be undertaken either by DPE via an amending SEPP or by Council via this planning proposal, whichever occurs first. A site specific DCP provision is proposed to ensure application of Clause 5.22.</p> <p>The flood modelling undertaken indicates that some dual occupancies within the precinct (which would be required to be raised above the probable maximum flood) may need to have voids underneath the ground floor level to ensure that overland flow paths are maintained. This would be addressed at DA stage, and a site specific DCP provision is proposed to ensure this is a matter for consideration.</p> <p>The Planning proposal will not result in significant flood impacts to other properties in the 1% AEP flood which is adopted for flood planning purposes.</p> <p>The proposed requirement to construct the floor level of residential accommodation above the PMF level requires further consideration prior to implementation, as does the proposed shelter-in-place option. Formal consultation with NSW Department of Planning and Environment – Floodplain Management Division and State Emergency Service will be required to confirm the suitability of the proposal as well as the adequacy of the flood risk and assessment plans that have been prepared to support the proposal.</p>

## Bushfire

Portions of the subject land are classified as bushfire prone as indicated by Figure 24. As such, a Bushfire Assessment has been undertaken over the subject land which considers the provisions of *Planning for Bushfire Protection 2019* (PBP).



**Figure 24 - Bushfire prone land (Source: Bushfire Assessment, Ecological)**

The Bushfire Assessment states that the proposed rezoning is suitable considering:

- the lower residual landscape risk exposure of the site;
- the disconnection of the site from extensive bushfire hazards;
- future development being significantly separated from locations with elevated bushfire risk, with separation from adjoining hazards provided by significant public infrastructure and management practices;
- future land uses can meet or exceed bushfire protection measures as per the Acceptable Solutions of PBP, thus allowing the level of residual risk to be reduced to an acceptable level;
- multiple feasible evacuation options; and
- none of the 'inappropriate development exclusions' specified in PBP are triggered by the rezoning.

Environmental Impact	Assessment
	<p>Considering the above, the following conclusions are made:</p> <ul style="list-style-type: none"> <li>• future development facilitated by the rezoning will not pose or be subjected to an unacceptable risk or provide for 'inappropriate development' outcomes;</li> <li>• the rezoning is consistent with the strategic planning principles of PBP;</li> <li>• bushfire protection measures can be accommodated by future development and reduce the residual risk to an appropriate level; and</li> <li>• future development resulting from rezoning will not adversely affect existing development or adjoining landowners and their ability to undertake bushfire management.</li> </ul> <p>Consultation with the RFS regarding the planning proposal will be required.</p>

## 4.2 Social and economic

The following table provides an assessment of the potential social and economic impacts associated with the proposal.

**Table 8 Social and economic impact assessment**

Social and Economic Impact	Assessment
Social	<p>It is expected that the proposed development will provide a positive contribution to the Coffs Harbour local government area. Benefits will include:</p> <ul style="list-style-type: none"> <li>• additional housing stock to cater for anticipated population growth (with the North Coast Regional Plan 2036 estimating an additional 8,950 houses will be needed to cater for population increase to 2036);</li> <li>• housing that will be able to cater for a range of household types;</li> <li>• new social housing. It is noted that housing projects delivered through the <i>NSW Government's Future Directions for Social Housing Strategy</i> will have a target of 30% social housing (generally with an increased number of social housing where practicable), creating integrated and inclusive communities with more opportunities to move beyond social housing;</li> <li>• flow on community/social benefits to the wider Coffs Harbour community.</li> </ul>

Local character and amenity	<p>The proposal seeks to facilitate the redevelopment of an existing low density residential area for a mix of two storey dual occupancy housing and low-rise apartment buildings of up to four storeys. While this is a significant change from the existing typically single storey dwellings on large lots, the proposed residential typologies provide a level of compatibility with the surrounding area to ensure an appropriate transition to surrounding single dwellings. Site specific development controls will be introduced via the Coffs Harbour DCP 2015 to ensure that future development complements and enhances local character.</p> <p>The precinct is located within proximity of a number of parks including:</p> <ul style="list-style-type: none"> <li>• a district scale park to the north of Bray Street (approximately 3ha) which includes active and passive open space and a playground;</li> <li>• the Kurrajong-Argyll Street local park (approximately 2,385sqm) which includes seating, trees and a small playground;</li> <li>• additional unembellished zoned open space is also located within and adjacent to the precinct including a 4,500 square metre area to the south of Kurrajong-Argyll Street local park and a 1,300 square metre area on the south side of Argyll Street within the western portion of the precinct. Both areas connect to the riparian open space corridors and are largely unembellished. They have potential to offer passive recreation opportunities.</li> </ul> <p>Council has indicated an intention to prepare a contributions plan to facilitate streetscape and open space upgrades within the site including open space embellishment, street tree planting and provision of footpaths.</p>
Acoustic	<p>A Road Traffic Noise Assessment was prepared to consider the acoustic impacts of existing and future surrounding vehicle movements on the precinct. The Assessment concludes that external noise intrusion would not preclude residential development across the subject land. Nevertheless, in some instances, non-standard construction may be required to reduce internal road traffic noise levels to acceptable levels. Such matters are capable of being determined at the development application stage.</p>
Economic	<p>It is expected that the proposal will provide a positive economic contribution to the local economy directly as a result of the construction of new dwellings and indirectly through a greater population base to support local business.</p>

## 4.3 Infrastructure

The following table provides an assessment of the adequacy of infrastructure to service the site and the development resulting from the planning proposal and what infrastructure is proposed in support of the proposal.



Table 9 Infrastructure assessment

Infrastructure	Assessment
Local	<p>Council has advised that the Bray Street Infill Area has adequate sewer and water capacity to support infill growth.</p> <p>Utility infrastructure may be required to be upgraded to support future development of the precinct. Council proposes the preparation of a contributions plan to identify required infrastructure upgrades as well as infrastructure costings and development contribution arrangements.</p>
Traffic and Transport	<p>A Traffic and Transport Assessment has been prepared to support the application. The Assessment notes that redevelopment of the subject site is planned to be carried out over a ten-year delivery period, with the bulk of the works proposed to be delivered in the first four years beginning late 2023. Assessment scenarios for the study were set for 2027 (Year 4 of redevelopment) and 2033 (Year 10).</p> <p>The proposal is estimated to generate 99 additional peak hour vehicle trips in 2027 and 122 additional peak hour vehicle trips in 2033. The impacts of other future developments in proximity to the site have been included to estimate future traffic. This includes additional traffic from resulting from the future Bray Street infill development and a reduction in traffic resulting from the operation of the Coffs Harbour Bypass.</p> <p>A comparison of the modelling results for the base 2027 and 2033 “without” and “with” development scenario indicates the following:</p> <ul style="list-style-type: none"> <li>the intersections along the Pacific Highway and Bray Street are expected to operate with lower average delays in 2033, which is associated with the expected decrease in traffic related to the implementation of the proposed Coffs Harbour Bypass;</li> <li>the operation of the Bray Street / Pacific Highway / Orlando Street intersection is expected to improve during the afternoon peak for both the “without” and “with” development scenarios;</li> <li>the Argyll Street / Pacific Highway intersection is expected to continue to operate over capacity during the morning and afternoon peak periods for both the “without” and “with” development scenarios in 2033. However, the critical movements along the Pacific Highway at this intersection are expected to operate satisfactorily. Additionally, an alternative access to the Pacific Highway is provided via the nearby signalised intersection of Bray Street / Pacific Highway, which is noted to operate acceptably during peak periods in 2033;</li> <li>all other intersections are expected to operate acceptably during the weekday morning and weekday evening peak periods;</li> <li>the proposal is expected to have minimal impacts to the operation of intersections in the surrounding road network in 2033.</li> </ul> <p>The Assessment concludes that the planning proposal satisfies the planning requirements on traffic engineering grounds and is not anticipated to have adverse traffic impacts on the surrounding road network.</p> <p>It is considered appropriate that consultation be undertaken with Transport for NSW.</p>

State

No adverse impact on State or regional infrastructure or the requirement for additional funding.

## 5 Consultation

### 5.1 Community

Council does not specify their intended community consultation period in the planning proposal. An exhibition period of 20 working days is considered appropriate and forms a condition of the Gateway determination.

### 5.2 Agencies

Council has nominated the public agencies to be consulted about the planning proposal.

It is recommended the following agencies be consulted on the planning proposal and given 30 days to comment:

- Coffs Harbour and District Local Aboriginal Land Council
- NSW Department of Education
- NSW Department of Planning and Environment – Biodiversity Conservation Division
- NSW Department of Planning and Environment – Floodplain Management Division
- NSW Health
- NSW Rural Fire Service
- State Emergency Service
- Transport for NSW

## 6 Timeframe

Council proposes a six month time frame to complete the LEP.

The Department recommends a time frame of six months to ensure it is completed in line with its commitment to reduce processing times. It is recommended that if the gateway is supported it also includes conditions requiring council to exhibit and report on the proposal by specified milestone dates.

A condition to the above effect is recommended in the Gateway determination.

## 7 Local plan-making authority

Council has advised that it would like to exercise its functions as a Local Plan-Making authority.

As the planning proposal has been identified as an accelerated rezoning the Department recommends that Council not be authorised to be the local plan-making authority for this proposal.

## 8 Assessment summary

The planning proposal is supported to proceed with conditions for the following reasons:

- renewal of the Argyll Estate precinct will deliver opportunities for additional housing as well as a greater housing mix as infill development in accordance with the North Coast Regional Plan 2036, Coffs Harbour Regional City Action Plan 2036, Coffs Harbour Local Strategic Planning Statement and Coffs Harbour Local Growth Management Strategy 2020;
- it considers and responds to site constraints including flooding, bushfire hazards and biodiversity.

As discussed in the previous sections 4 and 5, the proposal should be updated to:

- amend the Key Sites Map to detail only those allotments that have been identified as being capable of supporting dual occupancy development (i.e. where clause 4.1B of the Coffs Harbour LEP 2013 will not apply), consistent with the 'Renewal areas plan' on page 35 of the Urban Design Report;
- clarify that inclusion of Clause 5.22 'Special flood considerations' in the Coffs Harbour LEP 2013 will be undertaken either separately from the planning proposal by DPE or as part of this planning proposal process by Council, whichever occurs first;
- clarify that any Special Flood Considerations flood map will sit alongside existing flood mapping, outside the LEP framework;
- reference the Local Environmental Plan Making Guideline, December 2021 on page 4;
- clarify that a proposed 15.5 metre maximum height of building will apply to land zoned R3 Medium Density on page 19;
- note that Chapter 7 of Council's LGMS was endorsed by DPE in December 2020 on page 24;
- reference section 9.1 Ministerial Directions, rather than section 117 Ministerial Directions on page 25.

## 9 Recommendation

It is recommended the delegate of the Secretary:

- Agree that any inconsistencies with section 9.1 Directions 1.1 Implementation of Regional Plans, 1.4 Site Specific Provisions, 3.2 Heritage Conservation, 4.5 Acid Sulfate Soils, 5.1 Transport and Infrastructure and 6.2 Caravan Parks and Manufactured Home Estates are minor or justified; and
- Note that the consistency with section 9.1 Directions 4.1 Flooding and 4.3 Planning for Bushfire Protection are unresolved and will require justification.

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

1. The planning proposal is to be updated to:

- amend the Key Sites Map to detail only those allotments that have been identified as being capable of supporting dual occupancy development (i.e. where clause 4.1B of the Coffs Harbour LEP 2013 will not apply), consistent with the 'Renewal areas plan' in the Urban Design Report;
- clarify that inclusion of Clause 5.22 'Special flood considerations' in the Coffs Harbour LEP 2013 will be undertaken either by DPE or as part of this planning proposal process by Council, whichever occurs first;



- clarify that any Special Flood Considerations map will sit alongside existing flood mapping, outside the LEP framework;
  - reference the Local Environmental Plan Making Guideline, December 2021;
  - clarify that a proposed 15.5 metre maximum height of building will apply to land zoned R3 Medium Density;
  - note that Chapter 7 of Council's LGMS was endorsed by DPE in December 2020; and
  - reference section 9.1 Ministerial Directions rather than section 117 Ministerial Direction.
2. Consultation is required with the following public authorities:
    - Coffs Harbour and District Local Aboriginal Land Council
    - NSW Department of Education
    - NSW Department of Planning and Environment – Biodiversity Conservation Division
    - NSW Department of Planning and Environment – Floodplain Management Division
    - NSW Health
    - NSW Rural Fire Service
    - State Emergency Service
    - Transport for NSW
  3. The planning proposal should be made available for community consultation for a minimum of 20 working days.
  4. The planning proposal must be exhibited one month from the date of the Gateway determination.
  5. The planning proposal must be reported to council for a final recommendation four months from the date of the Gateway determination.
  6. The timeframe for completing the LEP is to be six months from the date of the Gateway determination.
  7. Given the nature of the proposal, Council should not be authorised to be the local plan-making authority.



\_\_\_\_\_ (Signature)

23/6/22 \_\_\_\_\_ (Date)

Craig Diss

Manager, Northern Region



23/6/2022

\_\_\_\_\_ (Signature)

\_\_\_\_\_ (Date)

Jeremy Gray

Director, Northern Region

Assessment officer

Kate Campbell

Senior Planning Officer, Northern Region

5778 1401

## Appendix 1 The subject land

Property street number	Street name	Property street type	Real property description
4	ARGYLL	STREET	LOT 63 DP 237307
15	ARGYLL	STREET	LOT 55 DP 237307
49	ARGYLL	STREET	LOT 37 DP 239231
50	ARGYLL	STREET	LOT 44 DP 239231
54	ARGYLL	STREET	LOT 83 DP 248371
63	ARGYLL	STREET	LOT 115 DP 248371
81	ARGYLL	STREET	LOT 107 DP 248371
6	BRADLEY	STREET	LOT 13 DP 238407
31	BRAY	STREET	LOT 6 DP 237307
1	DEBORAH	CLOSE	LOT 21 DP 239231
2	DEBORAH	CLOSE	LOT 32 DP 239231
4	DEBORAH	CLOSE	LOT 31 DP 239231
5	DEBORAH	CLOSE	LOT 23 DP 239231
11	DEBORAH	CLOSE	LOT 26 DP 239231
1	ELM	STREET	LOT 41 DP 237307
2	ELM	STREET	LOT 62 DP 237307
4	ELM	STREET	LOT 64 DP 237307
12	FREDERICK	STREET	LOT 97 DP 248371
16	FREDERICK	STREET	LOT 99 DP 248371
18	FREDERICK	STREET	Lot 100 DP 248371
2	KURRAJONG	STREET	LOT 16 DP 237307
4	KURRAJONG	STREET	LOT 17 DP 237307
8	KURRAJONG	STREET	LOT 19 DP 237307
16	KURRAJONG	STREET	LOT 23 DP 237307
23	KURRAJONG	STREET	LOT 30 DP 237307
28	KURRAJONG	STREET	LOT 6 DP 238407
39	KURRAJONG	STREET	LOT 20 DP 238407
43	KURRAJONG	STREET	LOT 58 DP 241934
44	KURRAJONG	STREET	LOT 48 DP 241934
45	KURRAJONG	STREET	LOT 59 DP 241934
46	KURRAJONG	STREET	LOT 49 DP 241934
47	KURRAJONG	STREET	LOT 60 DP 241934
49	KURRAJONG	STREET	LOT 61 DP 241934
53	KURRAJONG	STREET	LOT 63 DP 241934
59	KURRAJONG	STREET	LOT 66 DP 241934
5	MAPLE	STREET	LOT 10 DP 242705
9	MAPLE	STREET	LOT 8 DP 242705
3	RAYMOND	STREET	LOT 1 DP 612302
7	DEBORAH	CLOSE	LOT 24 DP 239231
12	KURRAJONG	STREET	LOT 21 DP 237307
56	KURRAJONG	STREET	LOT 54 DP 241934



3	ARGYLL	PLACE	LOT 61 DP 237307
5	ARGYLL	PLACE	LOT 60 DP 237307
7	ARGYLL	PLACE	LOT 59 DP 237307
9	ARGYLL	PLACE	LOT 58 DP 237307
26	ARGYLL	STREET	LOT 47 DP 237307
44	ARGYLL	STREET	LOT 41 DP 239231
46	ARGYLL	STREET	LOT 42 DP 239231
48	ARGYLL	STREET	LOT 43 DP 239231
62	ARGYLL	STREET	LOT 4 DP 612302
2	BRADLEY	STREET	LOT 11 DP 238407
25	BRAY	STREET	LOT 9 DP 237307
27	BRAY	STREET	LOT 8 DP 237307
61	BRAY	STREET	Lot 92 DP 248371
6	DEBORAH	CLOSE	LOT 30 DP 239231
10-10A	DEBORAH	CLOSE	LOT 28 DP 239231
27	FREDERICK	STREET	LOT 3 DP 612302
11	KURRAJONG	STREET	LOT 35 DP 237307
24	KURRAJONG	STREET	LOT 27 DP 237307
29	KURRAJONG	STREET	LOT 9 DP 238407
48	KURRAJONG	STREET	LOT 50 DP 241934
50	KURRAJONG	STREET	LOT 51 DP 241934
52	KURRAJONG	STREET	LOT 52 DP 241934
57	KURRAJONG	STREET	LOT 65 DP 241934
66	KURRAJONG	STREET	LOT 86 DP 248371
7	MAPLE	STREET	LOT 9 DP 242705
11	MAPLE	STREET	LOT 7 DP 242705
1	RAYMOND	STREET	Lot 2 DP 612302
19	BRAY	STREET	LOT 12 DP 237307
4	MAPLE	STREET	LOT 1 DP 242705
8	MAPLE	STREET	LOT 3 DP 242705
10	MAPLE	STREET	LOT 4 DP 242705
12	MAPLE	STREET	LOT 5 DP 242705
6	MAPLE	STREET	LOT 2 DP 242705
13	MAPLE	STREET	LOT 6 DP 242705
4	BRADLEY	STREET	LOT 12 DP 238407
33	ARGYLL	STREET	LOT 16 DP 238407
45	BRAY	STREET	LOT 2 DP 238407
30	KURRAJONG	STREET	LOT 5 DP 238407
31	ARGYLL	STREET	LOT 15 DP 238407
3	BRADLEY	STREET	LOT 19 DP 238407
32	KURRAJONG	STREET	LOT 4 DP 238407
27	KURRAJONG	STREET	LOT 8 DP 238407
43	BRAY	STREET	LOT 1 DP 238407
35	ARGYLL	STREET	LOT 17 DP 238407

31	KURRAJONG	STREET	LOT 10 DP 238407
32	ARGYLL	STREET	LOT 14 DP 238407
5	BRADLEY	STREET	LOT 18 DP 238407
47	BRAY	STREET	LOT 3 DP 238407
38	KURRAJONG	STREET	LOT 7 DP 238407
9	DEBORAH	CLOSE	LOT 25 DP 239231
8	DEBORAH	CLOSE	LOT 29 DP 239231
41	ARGYLL	STREET	LOT 33 DP 239231
3	DEBORAH	CLOSE	LOT 22 DP 239231
43	ARGYLL	STREET	LOT 34 DP 239231
38	ARGYLL	STREET	LOT 38 DP 239231
47	ARGYLL	STREET	LOT 36 DP 239231
42	ARGYLL	STREET	LOT 40 DP 239231
12	DEBORAH	CLOSE	LOT 27 DP 239231
45	ARGYLL	STREET	LOT 35 DP 239231
40	ARGYLL	STREET	LOT 39 DP 239231
21	BRAY	STREET	LOT 11 DP 237307
9	ELM	STREET	LOT 15 DP 237307
14	KURRAJONG	STREET	LOT 22 DP 237307
22	KURRAJONG	STREET	LOT 26 DP 237307
37	BRAY	STREET	LOT 3 DP 237307
17	KURRAJONG	STREET	LOT 33 DP 237307
7	KURRAJONG	STREET	LOT 37 DP 237307
3	ELM	STREET	LOT 40 DP 237307
18	ARGYLL	STREET	LOT 44 DP 237307
28	ARGYLL	STREET	LOT 48 DP 237307
25	ARGYLL	STREET	LOT 51 DP 237307
8	ELM	STREET	LOT 66 DP 237307
60	KURRAJONG	STREET	LOT 56 DP 241934
55	KURRAJONG	STREET	LOT 64 DP 241934
63	KURRAJONG	STREET	LOT 68 DP 241934
41	BRAY	STREET	LOT 1 DP 237307
17	BRAY	STREET	LOT 13 DP 237307
10	KURRAJONG	STREET	LOT 20 DP 237307
18	KURRAJONG	STREET	LOT 24 DP 237307
26	KURRAJONG	STREET	LOT 28 DP 237307
21	KURRAJONG	STREET	LOT 31 DP 237307
5	ELM	STREET	LOT 39 DP 237307
14	ARGYLL	STREET	LOT 42 DP 237307
24	ARGYLL	STREET	LOT 46 DP 237307
33	BRAY ST	STREET	LOT 5 DP 237307
11	ARGYLL	STREET	LOT 57 DP 237307
12	ELM ST	STREET	LOT 68 DP 237307
40	KURRAJONG	STREET	LOT 46 DP 241934

51	KURRAJONG	STREET	LOT 62 DP 241934
23	BRAY	STREET	LOT 10 DP 237307
15	BRAY	STREET	LOT 14 DP 237307
6	KURRAJONG	STREET	LOT 18 DP 237307
20	KURRAJONG	STREET	LOT 25 DP 237307
25	KURRAJONG	STREET	LOT 29 DP 237307
19	KURRAJONG	STREET	LOT 32 DP 237307
9	KURRAJONG	STREET	LOT 36 DP 237307
35	BRAY	STREET	LOT 4 DP 237307
16	ARGYLL	STREET	LOT 43 DP 237307
2	MAPLE	STREET	LOT 50 DP 237307
17	ARGYLL	STREET	LOT 54 DP 237307
6	ELM	STREET	LOT 65 DP 237307
29	BRAY	STREET	LOT 7 DP 237307
42	KURRAJONG	STREET	LOT 47 DP 241934
58	KURRAJONG	STREET	LOT 55 DP 241934
61	KURRAJONG	STREET	LOT 67 DP 241934
39	BRAY	STREET	LOT 2 DP 237307
7	ELM	STREET	LOT 38 DP 237307
22	ARGYLL	STREET	LOT 45 DP 237307
30	ARGYLL	STREET	LOT 49 DP 237307
3	MAPLE	STREET	LOT 52 DP 237307
13	ARGYLL	STREET	LOT 56 DP 237307
10	ELM	STREET	LOT 67 DP 237307
54	KURRAJONG	STREET	LOT 53 DP 241934
41	KURRAJONG	STREET	LOT 57 DP 241934
65	KURRAJONG	STREET	LOT 69 DP 241934
24	FREDERICK	STREET	LOT 102 DP 248371
83	ARGYLL	STREET	LOT 106 DP 248371
73	ARGYLL	STREET	LOT 110 DP 248371
65	ARGYLL	STREET	LOT 114 DP 248371
53	ARGYLL	STREET	LOT 118 DP 248371
67	KURRAJONG	STREET	LOT 70 DP 248371
23	FREDERICK	STREET	LOT 74 DP 248371
8	RAYMOND	STREET	LOT 79 DP 248371
68	KURRAJONG	STREET	LOT 87 DP 248371
3	FREDERICK	STREET	LOT 91 DP 248371
8	FREDERICK	STREET	LOT 95 DP 248371
28	FREDERICK	STREET	LOT 104 DP 248371
79	ARGYLL	STREET	LOT 108 DP 248371
69	ARGYLL	STREET	LOT 112 DP 248371
61	ARGYLL	STREET	LOT 116 DP 248371
19	FREDERICK	STREET	LOT 72 DP 248371
5	RAYMOND	STREET	LOT 77 DP 248371



58	ARGYLL	STREET	LOT 81 DP 248371
64	KURRAJONG	STREET	LOT 85 DP 248371
7	FREDERICK	STREET	LOT 89 DP 248371
4	FREDERICK	STREET	LOT 93 DP 248371
22	FREDERICK	STREET	LOT 101 DP 248371
76	ARGYLL	STREET	LOT 105 DP 248371
75	ARGYLL	STREET	LOT 109 DP 248371
67	ARGYLL	STREET	LOT 113 DP 248371
59	ARGYLL	STREET	LOT 117 DP 248371
21	FREDERICK	STREET	LOT 73 DP 248371
7	RAYMOND	STREET	LOT 78 DP 248371
56	ARGYLL	STREET	LOT 82 DP 248371
5	FREDERICK	STREET	LOT 90 DP 248371
6	FREDERICK	STREET	LOT 94 DP 248371
14	FREDERICK	STREET	LOT 98 DP 248371
26	FREDERICK	STREET	LOT 103 DP 248371
71	ARGYLL	STREET	LOT 111 DP 248371
51	ARGYLL	STREET	LOT 119 DP 248371
17	FREDERICK	STREET	LOT 71 DP 248371
25	FREDERICK	STREET	LOT 75 DP 248371
6	RAYMOND	STREET	LOT 80 DP 248371
52	ARGYLL	STREET	LOT 84 DP 248371
70	KURRAJONG	STREET	LOT 88 DP 248371
10	FREDERICK	STREET	LOT 96 DP 248371