



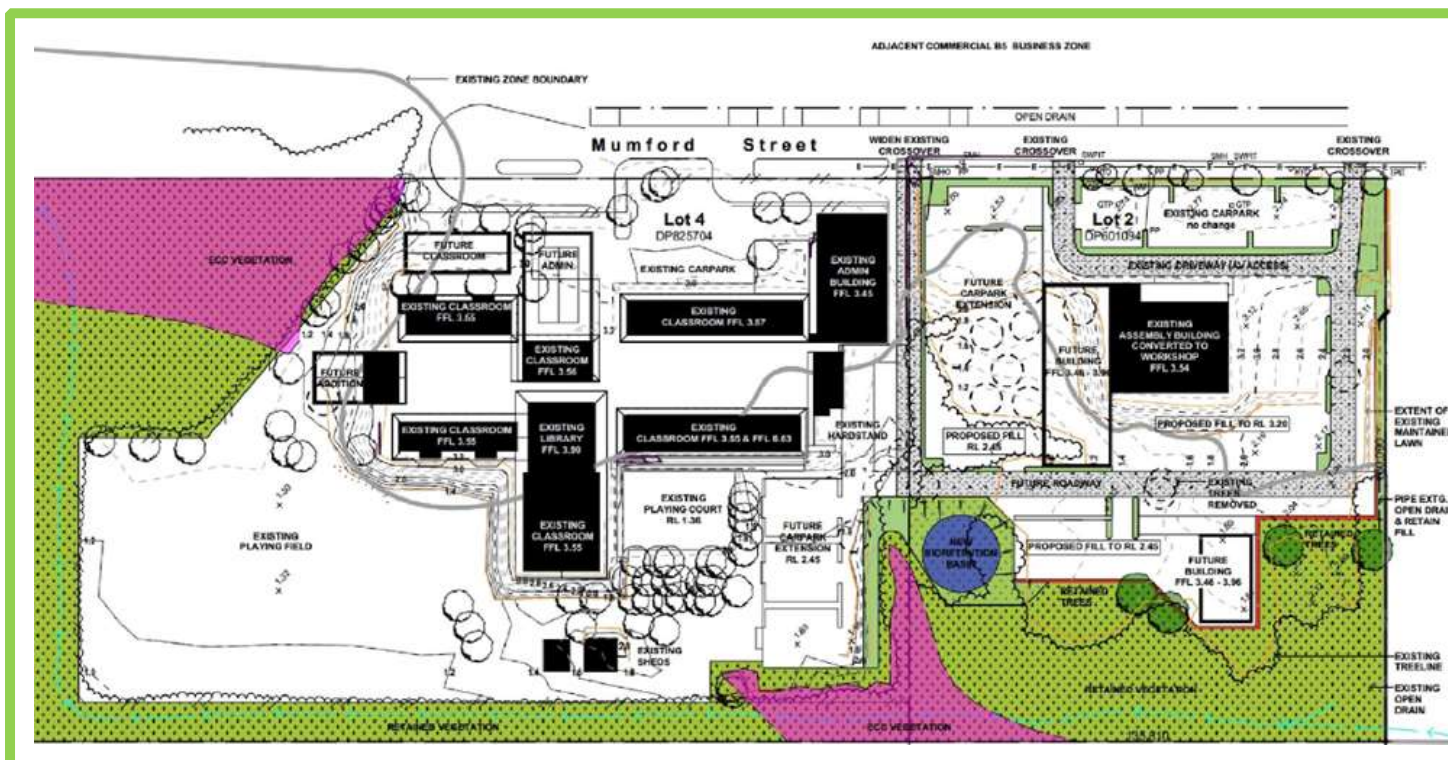
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Planning Proposal Application Mumford Street PORT MACQUARIE



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Document Details

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Executive Summary

This report is a revision and updated report based on the document provided in February 2018. This report refers to the legislation which came into force since the February 2018 reports and assessments were completed and lodged with Council. The legislative change since that time includes the introduction of State Environmental Planning Policy (Coastal Management) 2018. The additional information provided includes a modified concept plan which has reduced the footprint of the proposal and rationalised the stormwater controls. The revised engineering plans address the Coastal SEPP and the comprehensive ecological assessment has been the driving force behind the revised development footprint. Based on these investigations, a zone plan has been included with this information.

Council now has sufficient information to consider the planning proposal and utilise this information to correct the historic inaccuracies that exist in the current planning controls over the subject land.

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1. Introduction & Background

The subject land is comprised of two parcels of land with the western property being a long established primary and secondary school with several buildings and a large sporting area / playground. The eastern property was previously developed as a community church with a sealed carpark. The majority of the land has been maintained as a mown lawn. At the rear of both lots is a manmade drainage channel which drains to the west into a large wetland area.

This Planning Proposal application responds to the apparent discrepancy in the existing landuse zones for the subject land. A large area of the southern section of land is zoned for Environmental Conservation, however this zone boundary does not appear to relate to any physical features of the subject land. The northern area of the land is zoned for residential development.

The sale of the church site based on the ultimate use of the land as an extension of an adjacent vehicle sales and service business operation, led to the need to review the zone boundaries and identify suitable zoning for the land. As part of a comprehensive review of the context, it was noted that the adjoining school needed to also review their zone boundaries due to approvals to increase student numbers and a requirement for additional onsite parking.

Therefore, a Planning Proposal was first discussed with Council in 2014, and property negotiations and discussions commenced. The culmination of the required investigations is now the basis of this Planning Proposal application.

It is noted that the information sought by the Department of Planning at this stage of the Planning Proposal application is not intended to be to the level required for a development application.

The Department of Planning & Environment set out the following in their Guide to Preparing Planning Proposals:

It is not expected that a Council or proponent will provide comprehensive information to support a request for a Gateway determination. As a minimum, a planning proposal before a Gateway determination has been issued must identify relevant environmental, social, economic and other site specific considerations. The planning proposal document may identify the need for investigations and an approach for addressing the issues.

By way of further explanation, the Guidelines provide the following Explanatory Note:

Where vegetation management is an issue for a large site to be rezoned, it would be sufficient for the planning proposal to be submitted to the Gateway to identify the issue and indicate what environmental studies may be necessary to assess and analyse the value and location of the vegetation and how the matter(s) could be addressed.

2. Subject Land & Locality

The subject land may be identified as Lot 2 DP 601094 and Lot 4 DP 825704, 11 – 33 Mumford Street, Port Macquarie. The locality plan is shown in the following figure.

Figure 1: Locality Plan (Source: DavidPensiniReport)



Figure 2: Subject Land outlined in red



The subject land is currently occupied by a primary and high school on Lot 4 (western lot) with associated onsite parking, bus stop at the front of the school, and onsite playgrounds and sporting facilities for students. Lot 2 (eastern lot) is occupied by a large building which has previously been used as a church, with a sealed carpark on the northern side of the property, and mown areas which have been used for overflow parking previously. This western lot has more recently been used for overflow parking by the new owner of the property, in connection with a vehicles sales and repair yard on adjacent land.

The subject land adjoins wetland and low lying scrub vegetation on land to the west and south-western areas. The south-eastern adjoining land is a large lot residential site. The eastern neighbouring properties are currently occupied by a variety of urban uses including boarding kennels, local church, residential development, and a large recreation facility being T's Tennis Centre.

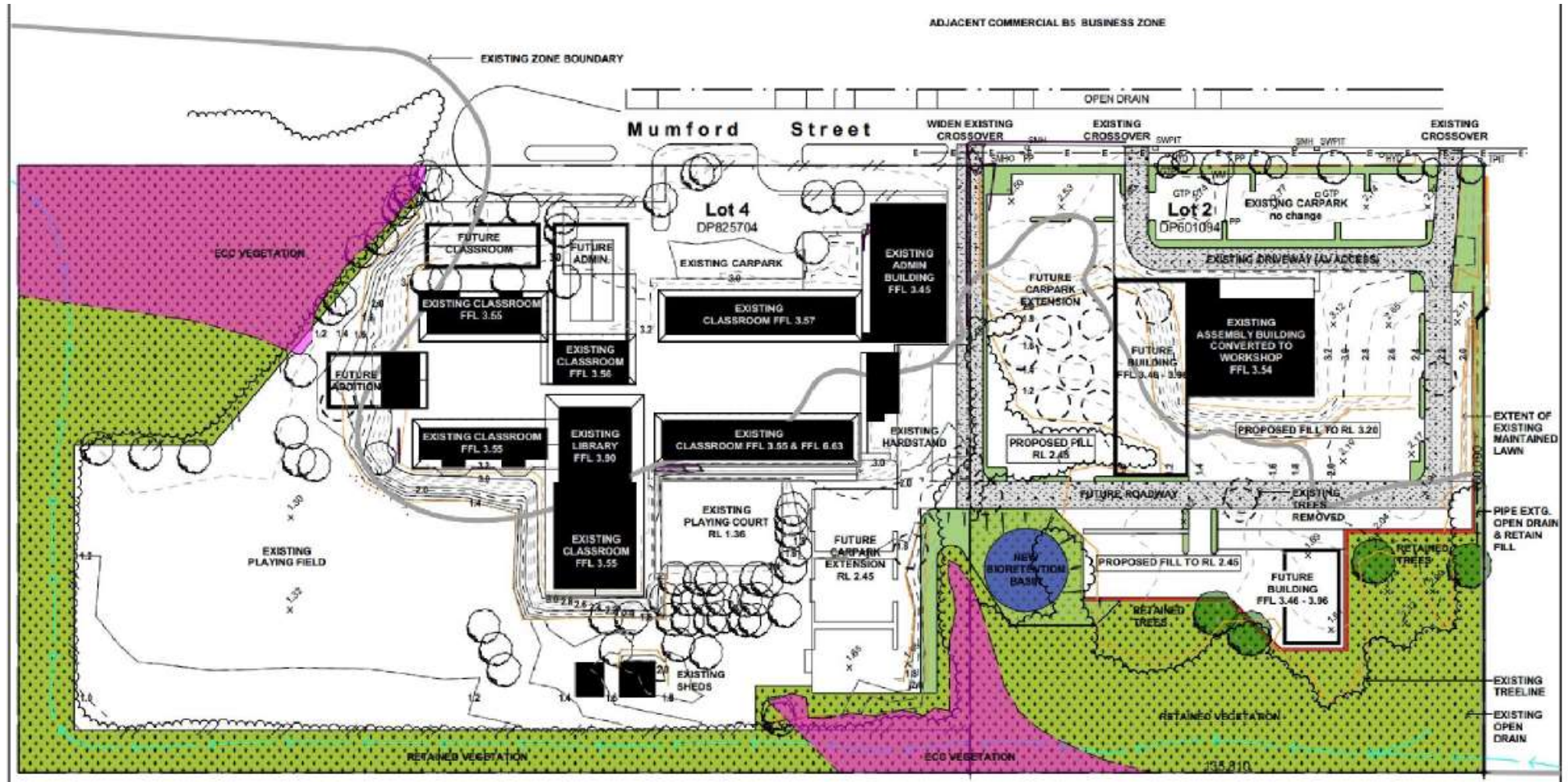
The northern boundary of the land is Mumford Street, with the properties on the other side of this road being the rear of the Melaleuca Village manufactured home park to the very north-western side, and the majority of the northern boundary being the various vehicle sales and repair yards.

Therefore, it may be seen that there is quite a wide variance in landuses in this locality.

3. Proposed Landuse

The proposal is to amend the landuse zones to facilitate additional onsite parking as part of the approved expansion to the existing school, and to rezone the eastern allotment to allow expansion of the vehicle sales and repair operations as currently exist on the adjacent land. The Concept Plan for this proposal is as shown in the following plan. This Concept Plan has been modified a number of times as a result of the site investigations, and particularly in response to flooding and environmental matters.

Figure 3: Concept Plan



The proposal for Lot 4 (School Site) is based on the number of additional students approved for the school. In order to achieve the approved number of students, there is a requirement for additional onsite parking. The school has existing use rights which provides for minor additions, however, in order to achieve the use of the existing cleared area of the school site, changes to the zone boundaries will be required.

The existing zone line is shown on the Concept Plan, and it is obvious that this line does not reflect the environmental significance of the land. There are a number of approved school buildings and playing fields located within the area currently zoned for environment protection. Therefore, the proposal is to map the environment protection zone to align with the areas of Lot 4 which actually contain environmentally significant vegetation and communities. This includes the coastal wetland area in the far north-western corner of the property, and the strip of vegetation along the southern drainage line.

The proposal for Lot 2 (ex Church site) is to utilise this property as part of the vehicle sales and repair business operations which currently exist on the adjacent property. The existing church building is a large hall which may be readily converted to vehicle repairs, and the existing carpark and open lawn areas of the property may be utilised for vehicle storage and parking.

Council's Flood Policy requires the proposed landuses to include filling of floodprone land, and a detailed flood analysis has been undertaken by qualified consultants. The Concept Plan has been modified to reflect the outcome of various flood modelling concepts to ensure the final design was compliant with flood standards such that no adverse impacts on adjoining lands would occur as a result of the filling of the subject land.

The proposal seeks the rezoning of the Lot 2 land to IN2 - Light Industrial, such that the following landuses are permissible with consent: vehicle body repair workshop, vehicle repair station and vehicle sales or hire premises. This would enable Council to consider a development application for such landuses, subject to the proposal is managed and conditioned to ensure it did not have any adverse impact on adjoining landuses.

Both properties require an amendment to the height limit, such that a maximum building height of 11.5m is sought. This reflects the development on the adjacent land in Mumford Street, and also enables the proposed developments to be undertaken with the inclusion of land filling – noting that building height is measured from the existing ground level. The floor space ratio is not proposed to be altered and would remain at 0.65:1 This ensures that the long term development of the subject land will have significant side setbacks and would be required to retain large areas of open space on the land.

4. Analysis of Subject Land & Proposal

The subject land has been investigated in relation to the required filling of the land, the additional traffic demands on the road network, the extension of infrastructure, the building bulk impacts, and the culminative impacts on the environment. The impact on downstream wetland and buffer areas has also been assessed. The Concept Plan has been amended a number of times to address the various modelling required to ensure the correct balance of the site development is achieved.

The outcome of these investigations and modifications is a Concept Plan which satisfies the most current of legislative requirements and data modelling. The separate consultant reports and consultations are attached as appendices to this Planning Proposal application, and discussed in summary as follows.

4.1 Traffic Impact Assessment

The Traffic Impact Assessment was based on criteria set out in the RMS Guide to Traffic Generating Developments, Austroads Guide to Traffic Management, as well as Port Macquarie – Hastings Development Control Plan.

The report notes that Lot 2 contains an existing large assembly building, and an existing sealed carpark for 60 vehicles. The assessment of future impacts was based on a Concept Plan to utilise the existing assembly building as a vehicle repair station comprising a number of workbays and associated staff, plus onsite parking area for vehicle storage.

The development of Lot 4 (School) was based on traffic surveys completed previously, with the most recent being in May 2017. The previous study noted the approval for student numbers to reach 500 students, and that additional onsite carparking would be required when the student numbers exceeded 444 students.

The Traffic Impact Assessment included morning and afternoon peak traffic movements, and the results are included in the report. The report concluded that the proposals would not adversely impact on traffic flows, however the full development of Lot 2 may require an upgrade of the nearest intersection to better manage traffic flows in this location.

4.2 Acid Sulphate Soils Assessment

The Acid Sulphate Soils Assessment report notes the aim is to “*demonstrate that the future development of the land can be undertaken without negative impacts associated with the disturbance of acid sulphate soils beyond that which would be associated with existing conditions*”.

The potential acid sulphate soils mapping for the locality identified the site as containing Classes 2, 3 and 5 soils. Based on the assessment undertaken, it was noted that there was a high probability of Acid Sulphate Soil conditions on the subject land, and thus, an Acid Sulphate Soils Management Plan would be required to address soil disturbance. The report notes that the *“active management of future construction activities will be required in order to respond to the risks associated with the disturbance of ASS on the subject site”*.

The report further notes: *“...based upon the nature and scale of the proposed development it is possible for the future development of the subject site to be undertaken so as to not result in acid sulphate soil impacts which could not be mitigated through the adoption of best practice ASS management principles. In this regard the filling of the subject site to provide for flood free building platforms can significantly reduce the potential impacts associated with ASS”*.

The report concludes: *“Based upon the information contained within this report, there are no Acid Sulphate Soil related constraints to the proposed rezoning of portion of the subject site”*.

4.3 Noise Impact Report

A Noise Impact Report was undertaken with the aim to *“determine the potential noise impacts associated with the future development of the subject site and its impact on sensitive residential receivers in the area”*.

The assessment has been based on the Concept Plan and typical noise level information, as this application relates to a rezoning proposal and not a development application.

The acoustic environment of the locality is not a typical urban residential area, but rather a mixture of commercial, business, light industrial, educational and open space areas of land. The DECC's Noise Policy for Industry was applied, noting that intrusive noise is limited to 5dB(A) above background noise level, as well as protection of amenity.

The report concluded *“It is possible for the future development of the subject site to be undertaken so as to not result in noise related landuse conflicts which could not be mitigated through the adoption of best practice noise management principles. In this regard the acoustic impacts associated with any future development of the subject site should be the subject of development specific noise impact assessment. Based upon the information contained within this report there are no noise related constraints to the proposed rezoning of portion of the subject site”*.

As previously noted, the density of development has been limited by the proposed floor space ratio, and this will assist in ensuring adequate setbacks are achievable to provide separation between landuses, as well as providing adequate area for noise mitigation if required.

4.4 Stormwater Management

The standards for Stormwater Management are that there should not be any increase over predevelopment flows. The development of the land will require the placement of fill material on the land. The period of time during these earthworks will require erosion and sediment controls in place, and this is a standard requirement for any development consent issued by Council. All finished batters will be maintained in a scour free state.

A BioRetention Basin forms part of the Concept Plans and this is included in the Stormwater Management Plan. Gross pollutant traps form part of these structures. The sizing of the area for the BioRetention Basin on site has been modified based on the calculations undertaken by Advisian. The more detailed stormwater management works are included in the Advisian Hydrology Impact Assessment Report.

The Stormwater Management Plan prepared by Alan Taylor & Associates notes that the:

Receiving catchment will be protected from

- (a) Filling works for any hardstand or carpark by Erosion and Sediment Controls to Council standard;*
- (b) Long term carpark / hardstand runoff by a Bio Retention Basin;*
- (c) Roofwater by detention tanks and scour / velocity outlets to Council standard; and*
- (d) Scour and particle loss of batters by concrete kerbs directing runoff to pits.*

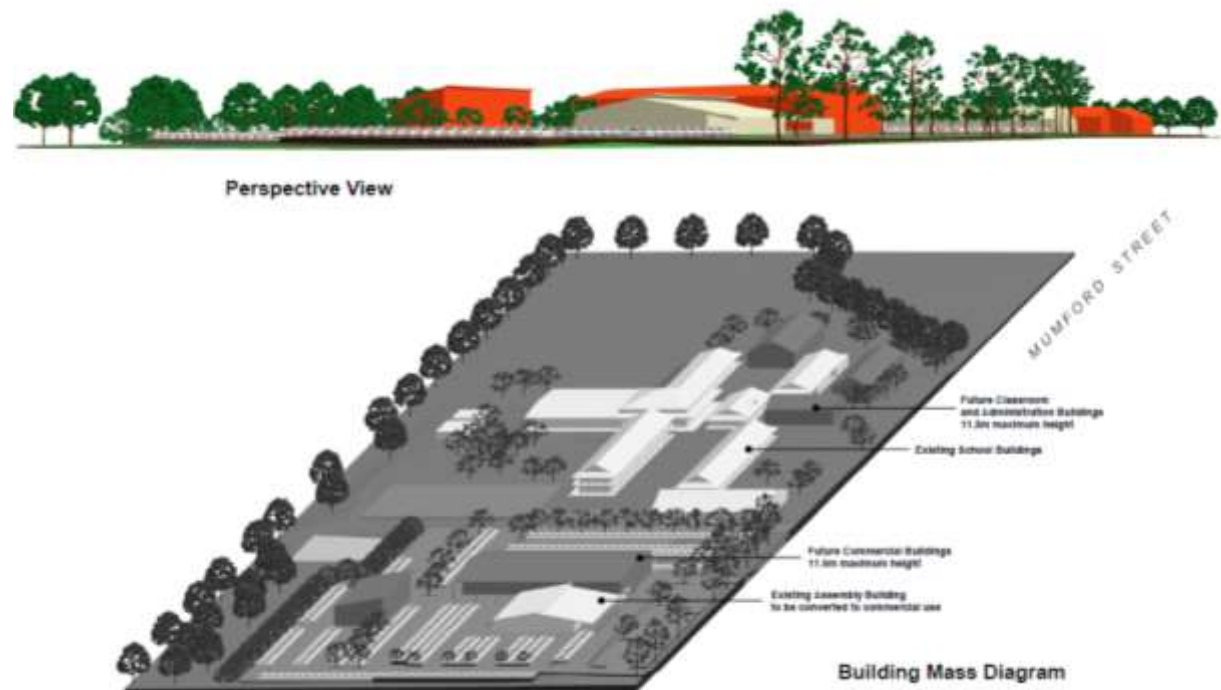
A full copy of the Stormwater Management Plan is included with the appendices to this Planning Proposal application.

4.5 Building Mass

As previously noted, the overall building height for the subject land is to be increased to 11.5 metres. This is the same as the adjacent land on the other side of Mumford Street. This is also reflective of the buildings heights in this locality. The building height will enable the development to be achieved in addition to the required filling works on floodprone land.

The proposal does not involve any change to the floor space ratios. This effectively constrains development on the subject land and minimises building mass. Modelling of the Concept Plan has been undertaken to demonstrate the building mass which would arise from the proposal. It may be seen that the development would not adversely impact on the adjoining sites, and there is sufficient area available to incorporate screen planting.

Figure 4: Building Mass of Concept Plan



4.6 Flood Impact and Risk Assessment

The subject land is identified as flood prone. The Concept Plan requires an extensive area of land filling over the eastern allotment. The school site has been the subject of land filling for the previous developments, and some additional filling will be required for the proposed works on that site. Only minor filling is required for carpark areas.

An analysis of the Concept Plan was undertaken by Advisian (incorporating Worley Parsons). This company has previously been engaged by Port Macquarie – Hastings Council to undertake the flood modelling for the Hastings River, including the increased levels associated with climate change. This data was used to update the current flood maps, as well as update Council's flood policy. Therefore, the data used for this proposal is based on the latest flood information and is compliant with Council's flood policy provisions.

The report considers the impact of the proposed filling on local flood characteristics including peak flood levels and flow velocities. The report also documents the potential mechanisms for evacuating the site during major floods including available warning times and potential evacuation routes.

The report notes the following with regard to Council's Flood Policy Compliance: Minimum 8 hours warning time – the modelling estimates between 8.5 – 13.5 hours warning time available. A safe reliable evacuation route is available and is not cut by the 5% AEP flood level. This evacuation route grades upwards to the approved Flood Evacuation Centre (Westport High School).

The report concludes that the proposal is compliant with Council's requirements and SES evacuation requirements. The proposed development is predicted to cause no change in 1% AEP flood hazards across adjoining properties.

A full copy of the report is included in the Appendices section.

4.7 Hydrology Impact Assessment

The introduction of State Environmental Planning Policy (Coastal Management) 2018, provided additional hydrological matters to be considered for landuses on the subject land. The relevant section 117 Direction for planning proposal matters, requires the consent authority to be satisfied that the future development of the land is likely to be able to satisfy the provisions of the Coastal SEPP.

Therefore, whilst the proposal for the subject land is conceptual only at this stage, the concept plan has been assessed by Advisian in relation to the provisions of the Coastal SEPP, and their Hydrological Assessment is included with the information lodged with this Planning Proposal.

The Hydrological Assessment considered both the provisions of the Coastal SEPP, as well as Council's stormwater controls and setout in the Design Specification D7.

The stormwater controls designed by Advisian were modelled. The reports notes that the function of the bioretention basin *"is to filter stormwater runoff via a densely vegetated layer and sand and loam filter media. As the water moves through the system pollutants are captured by filtration, adsorption and biological processing. Bioretention systems are effective at removing litter, fine sediment, phosphorous, nitrogen, metals and hydrocabons from stormwater. The treated water discharges to groundwater or is conveyed via subsoil pipes to a downstream drainage system or receiving water"*.

In regards to the potential impact of the proposed works on local groundwater and the nearby coastal wetland, the installation of the proposed bioretention / detention basin was found the reduce the impacts of the development by both treating and controlling the discharge of runoff from the site. The assessment determined the following:

- *The post development peak flows do not exceed the pre-development peak flows, and the difference between them has been minimised to reduce the impact on the local groundwater and the downstream wetland;*
- *Both Council's pollutant reduction targets are met, as well as Council's eco-system concentration targets. Therefore, from a quality perspective the impact on local groundwater and the downstream wetland will be minimal.*

Therefore, this assessment by Advisian has demonstrated that the proposal is capable of being compliant with the provisions of the Coastal SEPP.

4.8 Environmental Assessment

A complete environmental assessment has been undertaken for the Concept Plan. The report notes that most of the site is dominated by lawns, with a few remnant native trees and planted native and exotic trees and shrubs. The swamp forest areas are dominated by Broad-leaved Paperbark with a lesser abundance of Swamp Mahogany. No threatened plants were detected. An analysis of soils was somewhat inconclusive in regards to alluvial soil classification, and therefore a precautionary approach has been taken and some areas of the swamp forest have been assumed to qualify as the Endangered Ecological Community – Swamp Sclerophyll Forest on Coastal Floodplains.

The site was identified as having a lack of hollow bearing trees and also very limited connectivity due to the urbanisation of the locality. A 2005 survey identified koala and squirrel glider on site, however these species were not identified in the 2018 fieldwork. The site qualifies as core koala habitat and therefore any future development proposals will require the preparation of a Koala Plan of Management (KPOM), unless Council's coastal KPOM is adopted in the meantime.

The Coastal SEPP provisions with regards to Coastal Wetland and Coastal Wetland Proximity areas was considered in the ecological assessment. It was noted that no works within the wetland areas would be undertaken, and it was considered that the proposal was unlikely to significantly impact the attributes of the wetland.

The Biodiversity Conservation Act 2016 and the Commonwealth Environment Protection Biodiversity Conservation Act 1999 were considered with regard to the Concept Plan. It was determined that referral to the Commonwealth Department of Environment and Energy was not likely to be required under the EPBC Act. The final assessment under the relatively new Biodiversity Conservation Act would depend on the final plans for Lot 2, whilst the development on Lot 4 was considered to only require a five part test.

The Ecological Assessment identified a number of ameliorative measures, which are summarised as follows:

- Offset loss of some areas of swamp forest on Lot 2 and a reduction in the DCP 2013 guideline for EEC buffer, to be offset via bush regeneration works. Control of lantana and winter senna infestation as well as planting current pasture areas on Lot 2 to widen the and of vegetation in the south. These works to be undertaken via a Vegetation Management Plan with any future development approval;
- Two koala food trees to be removed are to be replanted at a 5:1 replacement ratio with a 5m x 5m spacing.
- Retained vegetation to be fenced off and protected during site works;
- Pre clearing koala surveys to be undertaken;
- Erosion and sediment control measures required during construction works, including silt fences and hay bales to protect downstream aquatic habitats.

- Donation of trees to local organisations;
- If security fencing is replaced or upgraded, then the new fencing should be designed to not pose an entanglement risk and include A frame structure to facilitate koala movement;
- Artificial lighting should minimise light spillage onto retained habitat areas and no lighting should be directed towards habitat areas.

These ameliorative measures may be incorporated into any future development approvals on the subject land.

4.9 Aboriginal Cultural Heritage

The Birpai Aboriginal Land Council were engaged to inspect the subject land and provide a response regarding whether the subject land contained any objects or was a place of importance or part of any wider cultural landscape for local Aboriginal people and the area. The consultation was also to determine whether any potential harm would arise to Aboriginal cultural heritage, and if so, the significance of any such potential harm.

Following the site inspection, and consultation with local Aboriginal peoples, the report noted that no sites were known or identified on the subject land. The report conclusion is as follows:

“Based on the site inspection and other investigation, there is no reason from an Aboriginal Cultural and Heritage perspective that this rezoning cannot proceed. However, during any earthworks, in the event of any items of Aboriginal significance being found on the site, work is to cease and a Sites Office from the Birpai Local Aboriginal Land Council is to be engaged to determine how best to proceed”.

The requirement to cease work should any artefacts be identified during site works is a legal and standard requirement for any future development proposal for the subject land.

4.10 Bushfire

A Bushfire Hazard Assessment has been undertaken for the subject land based on the Concept Plan design. The report found that a portion of the subject land was mapped as being bushfire prone. The recommendations include adopting Landscape Principles as set out in the report, adopting the Asset Protection Zones required for existing and future development (particularly the special uses developments – being schools), Preparing and adopting a Vegetation Management Plan for the southern area of vegetation, constructing buildings to the required standards to satisfy the Bushfire Attack Levels identified in the report, and ensuring internal access roads comply with the Bushfire Standards. Any Vegetation Management Plan will need to have regard to the requirements for Asset

Protection Zone maintenance. As noted in the Bushfire Hazard Assessment, the school development is considered infill development, however the buildings will likely require construction to a BAL standard or other mechanisms used to ensure compliance with the provisions of the Planning for Bushfire Protection document.

A full copy of the report is included in the Appendices section.

4.11 Retail Hierarchy / Employment Lands

Council's recently exhibited Urban Growth Management Strategy, included a number of supporting documents including a review and analysis of the retail hierarchy across the Port Macquarie – Hastings area. The strategy is essentially to maintain Port Macquarie as the Regional City and ensure that other retail areas do not usurp this status.

This Planning Proposal is for a minor additional to light industrial land. The landuse proposal is not considered to have any function in reducing the retail hierarchy of the Port Macquarie town centre. This precinct of Hastings River Drive has a long established pattern of containing the majority of vehicle sales and service businesses. This proposal is a reinforcement of this pattern, and will support an existing business operation.

The expansion of the school will not adversely impact on the established retail hierarchy, or create any additional employment lands.

Therefore, the Planning Proposal is not considered to adversely alter or impact on the Retail Hierarchy or location of Employment Lands as set out in Council's most recently exhibited Urban Growth Management Strategy.

5. Purpose of the Planning Proposal (Objectives or Intended Outcomes)

The intended outcome of this Planning Proposal is set out as follows:

The intended outcome is urban development across the subject land that is:

- able to be serviced with essential infrastructure;
- compatible with the local environment;
- well designed to facilitate social wellbeing; and
- compatible with surrounding landuses.

The objective is to provide planning based controls which enable urban development to be undertaken whilst achieving the above outcomes.

The secondary objectives are as follows:

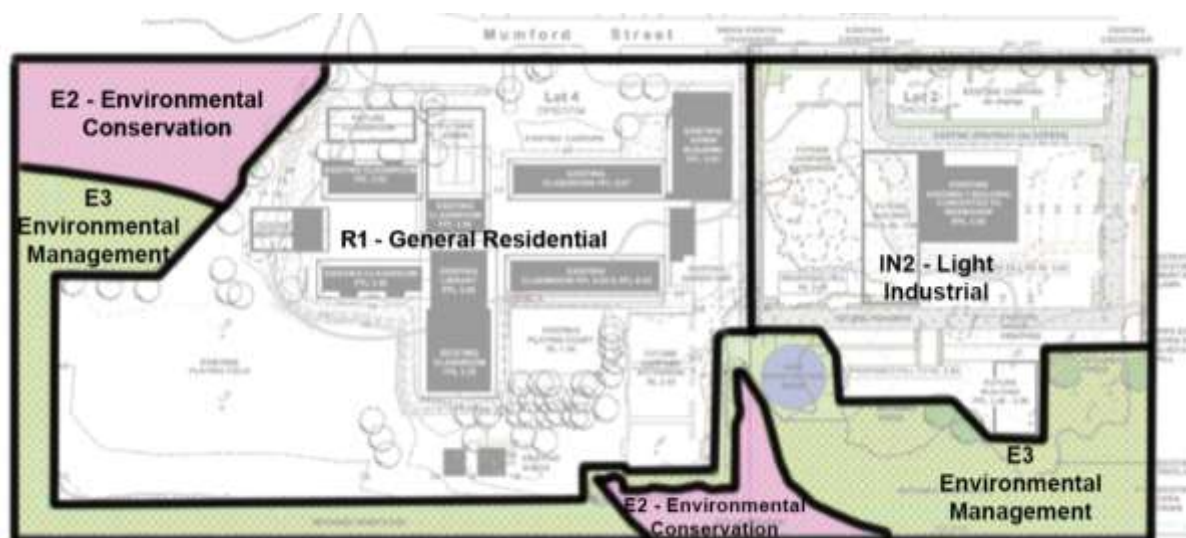
- to apply an E2 – Environmental Conservation zone over the parts of the subject land identified as containing environmental features.

The Planning Proposal will rectify the current anomaly in the alignment of the zone boundaries, and also facilitate the long term use of the subject land.

The Planning Proposal will require amendments to the LEP mapping including the Land Zoning Map, the Lot Size Map, Height of Building Map, and Koala Habitat Map.

The proposed zone map is shown as follows:

Figure 5: Proposed zone map with Concept Plan



6. Strategic Justification of Proposal

The Department of Planning & Environment issued a Guide to Preparing Planning Proposals, which refers to the questions to be considered when demonstrating a justification for the Planning Proposal.

(a) Need for the Planning Proposal

- *Is the planning proposal a result of any strategic study or report?*

The subject land is not specifically identified in Council's Urban Growth Management Strategy, nor in the North Coast Regional Plan map. The proposal makes a correction to a zone map error and a minor change to the zoning of part of the subject land.

- *Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?*

Amending the zone boundaries to reflect the actual attributes and features of the subject land is the only means of achieving the objectives or intended outcomes. Therefore, this Planning Proposal is the best means of achieving the objectives and intended outcomes.

(b) Relationship to strategic planning framework

- *Is the Planning Proposal consistent with the objectives and actions of the North Coast Regional Plan 2036?*

The Planning Proposal is consistent with the objectives and actions of the North Coast Regional Plan.

- *Is the Planning Proposal consistent with Council's Community Strategic Plan and Urban Growth Management Strategy 2010 – 2031?*

The Planning Proposal is not specifically identified in Council's Urban Growth Management Strategy. This is a minor matter which primarily addresses a mapping anomaly.

- *Is the Planning Proposal consistent with applicable State Environmental Planning Policies?*

This Planning Proposal is consistent with the provisions of SEPP 44, and a Koala Plan of Management will form part of the long term management of the subject land.

- *Is the Planning Proposal consistent with applicable Ministerial Directions (s117 Directions)?*

Environment Protection Zones: This direction is to protect and conserve environmentally sensitive areas by aligning the zone boundaries with areas of environmental significance. A Planning Proposal may be inconsistent only if justified by a study prepared in support of the Planning Proposal. The Planning Proposal provides the opportunity to introduce Voluntary Planning Agreements and Vegetation Management Plans for the subject land where there are currently no protections. Thus the Planning Proposal provides a greater overall environmental benefit and rectifies the current mapping error for the zone lines.

(c) Environmental, social and economic impact

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

The environmental investigations undertaken have been a comprehensive investigation of the environmental values of the subject land, which are now clearly

mapped. These investigations are also based on the most up to date (and recently amended) environmental legislation. The report has noted that the proposal is not likely to adversely impact on areas of critical habitat, or threatened species, or coastal wetland areas.

- *Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?*

-

There are no other likely environmental effects which have not already been considered in the environmental assessments undertaken to date.

- *How has the Planning Proposal adequately addressed any social and economic effects?*

The Planning Proposal will allow the school to achieve the approved increase in student numbers. This will have a positive social impact by facilitating access to this educational establishment for additional families who seek a Christian based education for their children. The Planning Proposal will also provide for the use of a parcel of land which was previously occupied by a church and is no longer required by that community organisation. The proposal will have a positive economic benefit by facilitating the long term use of a large parcel of land which otherwise would be under utilised. It will also facilitate the business operations in this locality which require additional land to operate. Thus, the Planning Proposal has adequately addressed the social and economic effects.

7. Conclusion

This Planning Proposal application will rectify an anomaly in the existing zone boundaries. The current zone lines do not reflect the physical features of the subject land. The Planning Proposal has also provided a mechanism to investigate and document the environmental features of the land, and provides a basis for future Vegetation Management Plans which may be implemented via future development applications. There are significant social and economic benefits to this Planning Proposal and the supporting studies and investigations are based on current knowledge and standards, including flood modelling which includes climate change allowances, and the most recent environmental legislation. Therefore, there is no reason not to support the proposal, which will have significant environmental, social and economic benefits.