

PLANNING PROPOSAL

**To Amend Clarence Valley Local Environmental Plan 2011
To Permit an Additional Use (Hotel or Motel Accommodation) on
Part of Lot 11 DP 1269790
(No's 75-79) Spenser St, Iluka**



**Prepared by: Rob Donges Planning Consultant
Date: September 2024**

Declaration

Document name: Planning Proposal – To amend Clarence Valley Local Environmental Plan 2011, to Permit an Additional Use (Hotel or Motel Accommodation) on Part Lot 11 DP 1269790 (No's 75-79) Spenser St, Iluka

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Occupation of document author: *Planning Consultant*

Qualifications of document author: *BA, Master Town and Country Planning*

Declaration: I, Rob Donges, declare that this Planning Proposal constitutes a planning proposal for the purposes of section 3.33 of the Environmental Planning and Assessment Act 1979 (the Act) and further declare that the document complies with the relevant provisions of the Environmental Planning and Assessment Act 1979 and the Department of Planning Industry and Environment's *Local Environmental Plan Making Guideline (August 2023)*.

Date: September 2024

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1. PRELIMINARY

1.1 Introduction

Iluka Bowls Club Ltd (Club Iluka) are investigating the possibility of constructing a motel on part of their property currently used as a croquet court plus an open area to the east in front of the Club building. Other areas of the property have been investigated with the initial idea being to use a level grassed area to the north of the new Ambulance Station, but it is in close proximity to bushfire prone land and so could not meet RFS requirements. The property is zoned RE2 Private Recreation upon which motels are prohibited.

Approval for a motel could be sought as an ancillary use to the Club, ie, limited to visitors to the Club for sporting activities etc, but the Club has had a Market and Financial Assessment (Jenny Rand and Associates, Sept 2022) prepared for the motel which included the following key findings:

- Iluka has a shortage of accommodation at peak periods with no 4+ star options.
- The outlook for Iluka is positive with population growth and the Pacific Motorway opening up the Northern Rivers and South-East Queensland markets.
- Motel located adjacent to Licenced Clubs generally outperform other properties of the same standard and provide motel guests direct access to the Club's food, bar, gaming and entertainment facilities, which will strengthen the Club's trading position, diversify risk and build resilience.

The financial assessment indicates the motel is financially viable on an occupancy rate of between 65% and 75% annually, depending on the size of the motel (20 rooms / 12 rooms), but that this cannot be achieved by Club visitors alone and needs to attract other visitors and holiday-makers who may visit the Club but are not in town for Club-related activities or functions.

1.2 Site and Locality

The land parcel being Lot 11 DP 1269790, located at No. 75-79 Spenser Street, Iluka (Club Iluka), has an area of 1.68ha consisting of:

- Clubhouse
- 2 bowling greens
- 1 croquet lawn
- Outdoor areas
- Carpark
- Vacant land to the north of the new Ambulance Station.

The Club also owns residences on No 81 & 83 Spencer St, both with an area of 1010m² and zoned R2 Low Density Residential upon which tourist and visitor accommodation is prohibited.

The Club has 2000 members, attracts around 20,000 visitors per annum and is a social hub for the town.



Figure 1- Location Map and proposed motel site (Blue hatch)

1.3 Current Zoning & Use

The land parcel is zoned **RE2 Private Recreation** which has the following Land Use Table:

1 Objectives of zone

- To enable land to be used for private open space or recreational purposes.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and enhance the natural environment for recreational purposes.

2 Permitted without consent

Nil

3 Permitted with consent

Advertising structures; Aquaculture; Boat sheds; Car parks; Centre-based child care facilities; Charter and tourism boating facilities; Community facilities; Entertainment facilities; Environmental facilities; Environmental protection works; Flood mitigation works; Function centres; Information and education facilities; Kiosks; Marinas; Markets; Mooring pens; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Respite day care centres; Restaurants or cafes; Roads; Take away food and drink premises; Water recreation structures

4 Prohibited

Any development not specified in item 2 or 3

In respect of the table:

- The proposal will provide financial resilience and diversification for the Club which provides private recreational facilities and is compatible with the Club.
- “Hotel or motel accommodation” is prohibited under 4.

2. PART 1 – OBJECTIVES & INTENDED OUTCOMES

- Objectives - Amend Schedule 1 of the *Clarence Valley Local Environmental Plan 2011* to allow additional permitted uses for hotel or motel accommodation at the Club Iluka located at 75-79 Spencer Street Iluka.
- Intended Outcome – To provide motel accommodation for visitors to Club Iluka and to strengthen the Club’s financial viability to provide important social and recreational services to the community; and to meet an identified need for additional tourist accommodation in Iluka.

3. PART 2 - EXPLANATION OF PROVISIONS

- Amend *Clarence Valley Local Environmental Plan 2011* Schedule 1 Additional Permitted Uses as follows:

“Use of certain land at No. 75-79 Spencer St, Iluka”

- “1. This clause applies to part of No. 75-79 Spencer St Iluka being part Lot 11 DP 1269790 identified as XX on the Additional Permitted Uses Map.*
- 2. Development for the purpose of hotel or motel accommodation is permitted with development consent.”*

- Amend the *“Clarence Valley Local Environmental Plan 2011 Height of Buildings Map”* from no height limit to J-9m, in accordance with the proposed height of buildings map attached at Annexure A.

There is no minimum lot size on the property and none is proposed as it is not intended to subdivide off the subject land.

4. PART 4 - JUSTIFICATION

SECTION A – NEED FOR A PLANNING PROPOSAL

4.1 Is the planning proposal a result of an endorsed Local Strategic Planning Statement (LSPS), strategic study or report?

The Clarence Valley LSPS references the following strategic document:

4.1.1 Clarence Valley Regional Economic Development Strategy

The 2023 REDS updates the initial 2018-2022 Strategy and provides an updated evidence base to guide governments in making policy and investment decisions to enhance resilience and drive sustainable, long-term economic growth in the region.

The tourism industry is identified as an “engine industry” and is referenced throughout the Strategy including the following Strategy:

Develop a visitor economy that best takes advantage of the Clarence River and the coast, leveraging the region's adventure and nature tourism opportunities.

The proposed motel in the riverside village of Iluka will contribute to this Strategy.

4.1.2 Clarence River Way Masterplan II (2021)

The Clarence River Way Masterplan II (2021) identifies the need for new accommodation within the Clarence River corridor, with the LGA needing both budget and 4 to 5 Star accommodation, including boutique / unique accommodation. Direction D3.2 of the Master plan (Encourage development of 4 to 5 Star accommodation), has as actions 'Encourage private sector development of higher end facilities in river town locations' and 'Examine possibilities of longer term development of conference facilities with accommodation'. The proposed Club Iluka Motel will deliver on both actions, with the club already having conference facilities in place.

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

YES

The alternative would be to rezone either the whole property, or the identified motel site to SP3 Tourism which permits hotel or motel accommodation and registered clubs with consent. The concern is that the SP3 zone allows a range of uses with consent such as helipads and residential accommodation while the Additional Use approach restricts it to specifically being a motel or hotel.

SECTION B - RELATIONSHIP TO STRATEGIC PLANNING FRAMEWORK

4.3 North Coast Regional Plan 2041

NCRP 2041 Objectives Checklist is attached at Annexure C.

The relevant objectives are:

Objective 5 Manage and improve resilience to shocks and stresses, natural hazards and climate change

Under Council's current flood model (2013) there is no flood information for the subject property as it is not affected by either the 1 in 100 year level or the Extreme level, but the closest flood prone land, in Queen Street, has a 1 in 100 year flood level is RL2.51m and the extreme flood level is RL3.53m. The level of the subject property is generally RL5.5m and so is not affected by either event – Survey Plan (Annexure L).

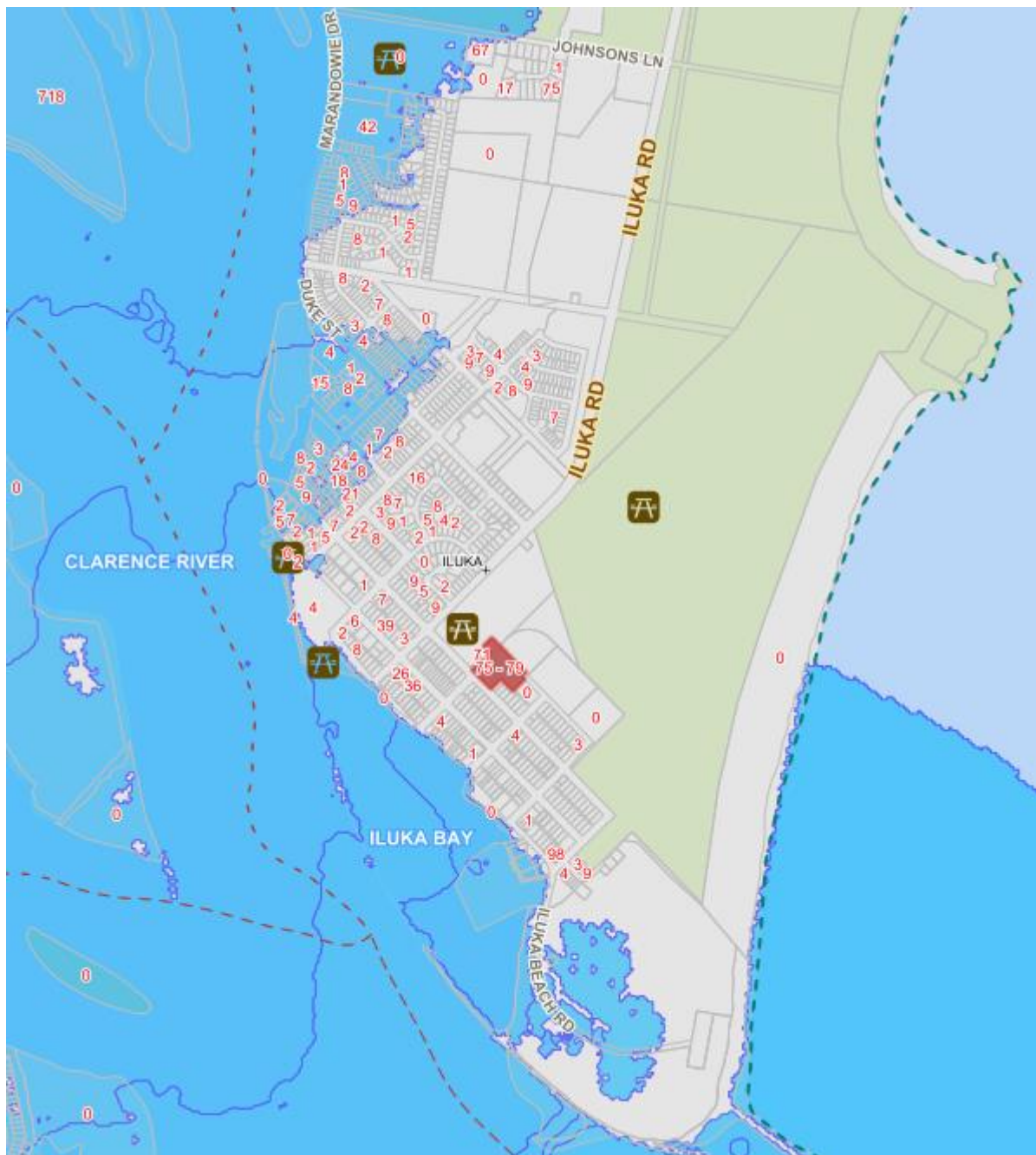


Figure 2 Flood Map 2022 1 in 100 Climate Change Level

Under Council's 2022 Flood Model, the 1 in 100 year interim climate change level for Iluka is generally RL2.9m and the interim Probable Maximum Flood (PMF) is RL6.9m. The property would not be affected by the 1 in 100 year climate change level, but its lower floor would be inundated in a PMF.

The location is not mapped as floodway or flood storage.

The SES Clarence Valley Local Flood Emergency Sub Plan consists of 3 volumes:

- Volume 1 (July 2023)
- Volume 2 Hazard & Risk in Clarence Valley (December 2023)
- Volume 3 Clarence Valley Flood Warning Systems & Arrangement (February 2024)

Volume 3 includes Chapter 2 Clarence Valley: NSW SES Locality Response Arrangements.

The Iluka Sector is addressed at Section 2.8 of Volume 2. Information relevant to this proposal includes:

2.8.3 Flood Behaviour

c. Iluka is at the confluence of the Clarence and the Esk Rivers. The township can become isolated from 20% AEP and will start to experience flooding in a 1% AEP event.

2.8.4 Classification of Floodplain

| OBJECTID | Polygon Name | Gauge Name | Gauge Number | Gauge Height | Population Estimate | Dwelling Estimate | Vehicle Estimate | Comment |
|----------|----------------------------|------------|---------------|--------------|---------------------|-------------------|------------------|-------------------|
| 47291 | Chatsworth Island | Maclean | 204410-558022 | 1.65 | 503 | 258 | 464 | Low Flood Island |
| 47704 | Warregah Island | Maclean | 204410-558022 | 1.65 | 31 | 13 | 23 | High Flood Island |
| 47705 | The Anchorage Holiday Park | Yamba | 204454-558062 | 2.1 | 73 | 45 | 81 | Low Flood Island |
| 47706 | Iluka | Maclean | 204410-558022 | 2.1 | 1595 | 1192 | 2146 | High Flood Island |
| 51605 | Woody Head Campground | Maclean | 204410-558022 | 2.1 | 285 | 95 | 171 | High Flood Island |

2.8.6 Isolation

a. Iluka - Some roads within Iluka can also be cut by flood waters, and access can be cut necessitating large-scale resupply by boat or air (2).

b. Iluka Road is closed at 2.1 m (Maclean gauge (204410-558022)) isolating Iluka in larger floods for periods up to five days; but this is dependent on tidal influences and could be longer (2).

Volume 3 Chapter 2 addresses the Iluka Sector at Section 7.1, a copy of which is attached. It includes the following Evacuation Trigger identified at the Maclean gauge.

2. Prediction to reach and/or exceed 2.1 m (isolation)

The Iluka Road at the Esk River may be cut, causing isolation of the town.

Based on monitoring and assessment known locations of flooding are: Marandowie Drive, Melville Street, Sovereign Street and Conrad Close.

It also states that Iluka Road can be cut at the Esk River (2.1m on Maclean gauge).

The Iluka Community Organisation Planning for Emergencies (ICOPE) Inc. has also prepared an Action Plan for a Community Managed Evacuation Centre in Iluka Village as a supporting document to the Clarence Valley Local Emergency Management Plan. ICOPE's Plan details evacuation procedures within Iluka Village, which includes Woody Head and The Freshwater. It has been endorsed by the Clarence Valley Local Emergency Management Committee. It identifies the Iluka Community Hall as the primary evacuation centre with Club Iluka as backup. Critically, it does not deal with floods approaching and up to the PMF which would inundate the majority of Iluka, including the two evacuation centres.

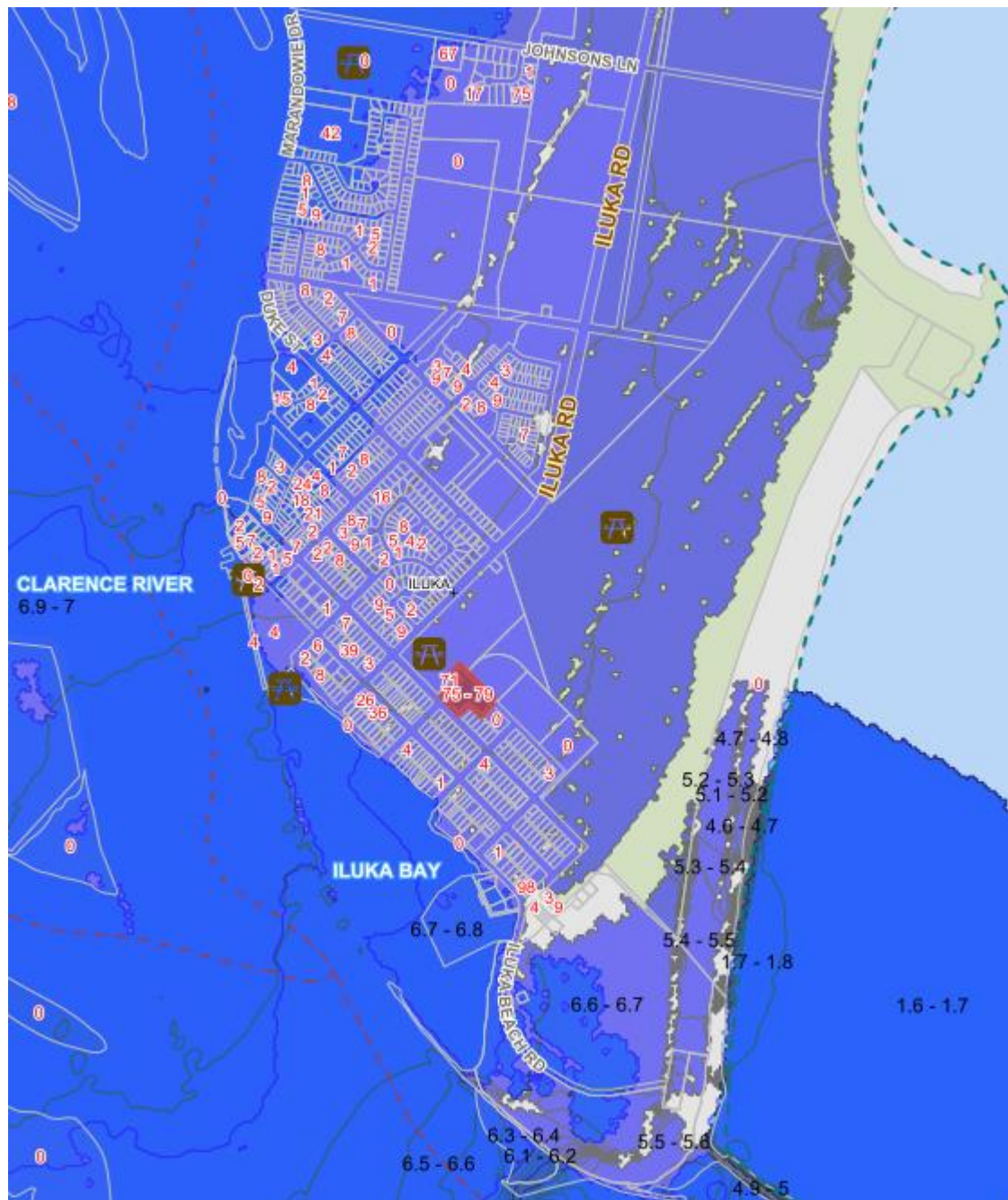


Figure 3 2022 Flood Map PMF

The PMF level in the 2022 Flood Model is RL6.9m. This will flood all of Iluka urban area with the exception of a small elevated area in Thompson Street near the reservoir. A PMF will also cover the majority of Iluka Road to the Pacific Motorway, which in turn is cut at various locations to the south and to a lesser extent to the north.

The depth of water over the motel site and club is approximately 1.1m.

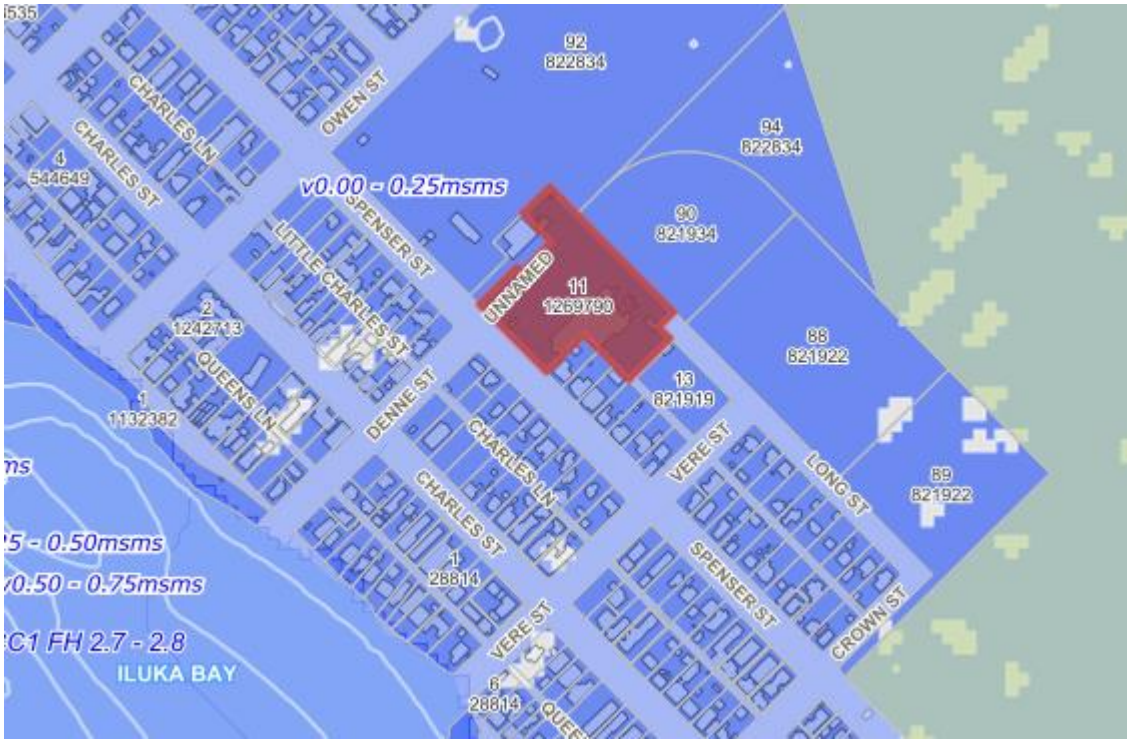


Figure 4 PMF Velocity Map

The PMF velocity in the vicinity of the club is 0.00-0.25m/s.

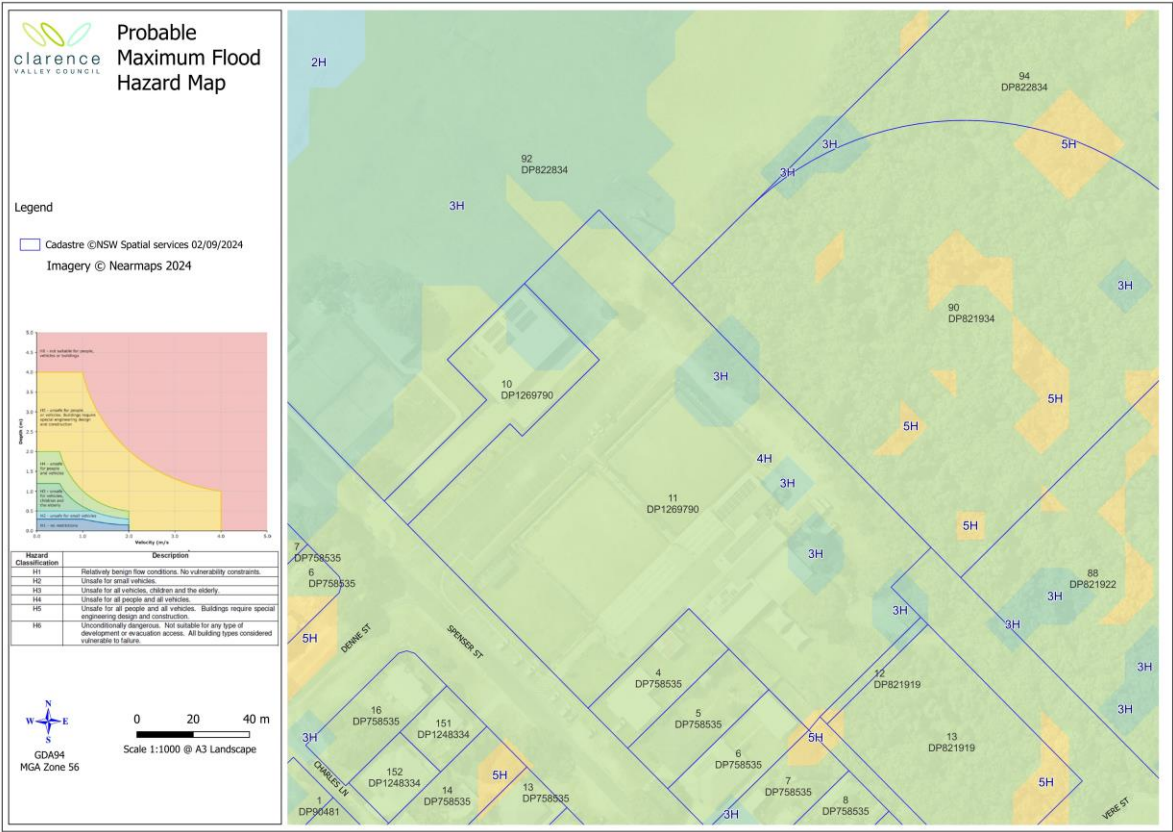


Figure 5 Flood Hazard Map

The motel site on the Club property is mapped as **H4 - unsafe for vehicles and people**. In a PMF all of Iluka village would require evacuation with the exception of the small elevated section. Under the draft evacuation plan (see below) for the motel it will be evacuated if a 1 in 20 year flood event is predicted and rendered uninhabitable by disconnecting power and water. It will therefore not require evacuation for any flood between 1 in 20 year and the PMF as the building will be empty.

In respect of potential adverse impacts on surrounding properties, this would be the subject of a Flood Impact Assessment prepared by a duly qualified engineer accompanying a future development application for the motel.

It is proposed that the motel be subject to an Evacuation Plan, a draft of which is attached. The guiding principles of this Plan are:

- The motel will evacuate and residents directed to leave the village when the Maclean gauge is **predicted** to reach 2.1m. A recent flood evacuation plan for West Yamba (West Yamba Flood Evacuation Plan BMT August 2023) states that Yamba has between 12 and 24 hours' notice of an approaching flood.

While this addresses Yamba only, it should be noted that both Iluka and Yamba are located at the mouth of the river and have an identical predictor for isolation – 2.1m on the Maclean gauge. In accordance with the SES Iluka Sector Plan, motel/club staff will monitor the following if any flooding is predicted in the valley:

- Flood Watch
- Flood Warning
- AWS Advice
- AWS Watch and Act
- AWS Emergency Warning

As soon as there is a **prediction** that the Maclean gauge will reach 2.1m, guests will be directed to leave town and go to either Maclean, Yamba or return home. Evacuation centres are located in both Maclean and Yamba and times from the motel to these centres are 30 minutes and 35 minutes respectively.

According to the Yamba information they will have between 12 hours and 24 hours' notice for a riverine flood. If the prediction is that the 2.1m level will be reached after dark, guests will be directed to leave in daylight hours. If the prediction is issued at night time guests will have ample time to evacuate the next day if they wish.

As an example of how this works in real flood experiences, CVC's Manager Technical Services, has provided the following information on the February/March 2022 flood.

| | |
|---------------|--|
| Thursday 24/2 | Flood Watch No. 1 issued for minor flooding in the Clarence Valley. Four subsequent Flood Watch notices were issued. |
| Saturday 26/2 | Flood Watch No. 5 issued for moderate to major flooding possible from Sunday 27/2 in Clarence Valley. |
| Monday 28/2 | 2.1m on Maclean gauge reached, Yamba Road closed that day. |

These timelines would be similar for Iluka Road, noting that Yamba Road cuts at Harwood Bridge first which is further inland than the Esk River Bridge so Iluka would have marginally greater notice.

Under the evacuation plan, motel staff would have commenced monitoring on the Thursday and advised guests of possible flooding. Guests booked for the weekend would have been contacted and advised that the motel would be closed until further notice.

The evacuation would have been ordered on Saturday 26th and Iluka Road was likely closed on Monday 28 February, 2022.

- All services to the motel will be disconnected at that time which will ensure guests evacuate.
- A copy of the Plan will be available in each room showing evacuation routes to Maclean or north and south on the Pacific Motorway.

The advantage of this approach is that it is wholly managed by the Club and based on information provided by the SES and flood warning announcements. In practice this means the motel will be evacuated and will have safely left the village before Iluka Road is cut at the Esk River, predicted to be during a 1 in 20 year event. Should the flood event be greater than that level, up to a PMF, the motel will be empty and no special evacuation plans for a PMF will be required due to its evacuated state.

It should also be noted that a future development application for the motel would need to be assessed under **Clause 5.22 Special flood consideration** as a “sensitive and hazardous development”.

Objective 12 Create a diverse visitor economy

The Objective includes:

“A key challenge for the region is being able to grow and enhance the tourism sector by having a greater focus on agri-tourism and eco-tourism, while ensuring the impact does not harm the region’s environmental and agricultural qualities.”

The Iluka World Heritage Rainforest Reserve is located adjacent to the Club and contains the Iluka Rainforest walking track which is a premier ecotourism experience in the lower Clarence Valley. The site is in close proximity to beaches and the river which are primary tourist attractions in the town for tourists and residents.

It also identifies prime tourism development areas on the north coast and states:

Medium-to smaller-scale nature-based and coastal tourism accommodation can be provided outside these prime tourism areas.

Strategy 12.1 associated with this Objective includes:

“identify appropriate areas for tourist accommodation and tourism development”

The proposal in its minor way assists both those strategies.

4.4 Is the planning proposal consistent with a Council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?

4.4.1 CVC Local Strategic Planning Statement (July 2020)

A LSPS Assessment Checklist is attached at Annexure D and Council's Strategic Plans Consistency Checklist is at Annexure E.

The statement includes and identifies planning priorities for the Clarence Valley LGA that are consistent with the North Coast Regional Plan, Council's Community Strategic Plan (The Clarence 2032), and any other relevant strategic plans.

The statement contains 21 priorities grouped under Society, Infrastructure, Economy, Environment and Leadership. Under Economy is **Priority 14 – Promote the growth of sustainable tourism**. The following Actions are listed under the Priority.

| Priority 14 – Promote the growth of sustainable tourism | | |
|--|-------------------|-------------------------------------|
| Actions | Timeframe | Partner |
| 14.1 Ensure the land use planning framework enables the progressive implementation of appropriate projects to welcome and sustainably manage visitors to the area particularly to enable appropriate development in Grafton and our river towns and coastal areas. | <i>Immediate</i> | Community |
| 14.2 Update the Clarence Valley LEP and relevant DCPs to build on the strengths of the Clarence River and support appropriate tourism opportunities and help implement aspects of the Clarence River Way Masterplan. | <i>Short term</i> | DPIE, TFNSW, Tourism NSW, community |
| 14.3 Identify opportunities to expand nature-based adventure and cultural tourism by leveraging the Clarence Valleys natural, heritage and community assets. | <i>Short term</i> | Tourism NSW, Community |

The proposed 4 star motel will fill an identified market gap for upper-end accommodation in Iluka, and in the Valley as a whole where only 6% of accommodation is rated as 4 star and above.

4.4.2 Clarence Valley Employment Land Strategy 2022

Does not directly address tourism as an employment driver or analyse the need for additional tourism land. Demand and suitability of sites for tourism purposes is often a factor that is unique to the site, ie, in this instance the Club and the proximity to the Rainforest Reserve.

The proposal will provide financial resilience and variety to the Club which provides private recreational uses and facilities and is compatible with the Club.

4.4.3 Clarence Valley Settlement Strategy

The Strategy contains 26 Specific Area Strategies, including Iluka as a stand-alone area where it states:

“Limited expansion opportunities will ensure that Iluka retains its village character as an important retirement and holiday location. It will also continue to act as a service base providing for local needs. Detailed design controls and two storey height controls are to be included in a DCP to ensure that the future scale of development is appropriate to the village. Any expansion should fully consider koala habitat values including browse trees and management of threats. Potential impacts on the national park and nature reserve should also be considered.”

The proposal fits comfortably into this strategy as it:

- Strengthens the attraction of Iluka as a holiday destination.
- Adopts a 2-storey (9m) height limit.
- No impact on koala habitat, the national park or nature reserve, but its close proximity will encourage visitors to explore the Rainforest Reserve.

The draft Clarence Valley Housing Strategy will most likely supersede this Strategy but it is yet to be adopted. It proposes rezoning sections of Iluka centre to R3 Medium Density with a height limit of 12m, including a strip on the southern side of Spenser Street opposite the club.

4.5 Is the planning proposal consistent with any other applicable State and regional studies or strategies?

4.5.1 NSW Visitor Economy Strategy 2030

This state government tourism strategy aims to make NSW the premier visitor economy of the Asia Pacific. It states:

“Regional NSW will be key to the future of the state’s visitor economy and a focus of the strategy”.

The motel serving all visitors rather than only those involved in activities at the Club will contribute to the Strategy.

4.5.2 A 20 Year Economic Vision for Regional NSW

The North Coast Section of the Vision states:

“The North Coast economy has a strong tourism sector due to its proximity to major centres and the region’s distinctive environmental and heritage endowments”

The proposal will strengthen the Lower Valley’s tourism industry and allow more visitors to experience the areas’ attractions.

4.5.3 NSW Visitor Economy Strategy 2030

This Strategy also highlights the importance of regional NSW to the tourism economy of which the motel will form a part.

4.6 Is the planning policy consistent with applicable SEPPs?

A SEPP Consistency Checklist is attached at Annexure F.

The only applicable Policy is SEPP (Resilience & Hazards) 2021 as the property is in the Coastal Zone and mapped as Coastal Environment Area. In addition, Council is currently developing a Coastal Management Plan for the open coast and river. While the site itself is not affected by coastal hazards, Iluka Road is. This is addressed in Annexure H Clause 2.13. An assessment of the relevant clauses is attached at Annexure H and concludes the proposal is consistent with the Policy. As it is in the Coastal Zone it is also applicable to the relevant provisions of the 2023 NSW Coastal Design Guidelines which are assessed at Annexure K.

4.7 Is the planning proposal consistent with applicable Ministerial Directions (S 9.1 Directions)

A Section 9.1 Directions Consistency Checklist is attached at Annexure G and the majority are not applicable but the following are:

Direction 4.1 Flooding

This direction applies to all relevant planning authorities that are responsible for flood prone land when preparing a planning proposal that creates, removes or alters a zone or a provision that affects flood prone land.

Clause (2) states *“A planning proposal must not rezone land within the flood planning area from Recreation, Rural, Special Purpose or Conservation Zones to a Residential, Employment, Mixed Use, W4 Working Waterfront or Special Purpose Zones.”*

COMMENT: The Floodplain Development Manual (2005) defines the flood planning area as: *the area of land below the FPL and thus subject to flood related development controls. The concept of flood planning area generally supersedes the ‘flood liable land’ concept in the 1986 Manual.*

The Flood Planning Level (FPL) is the 1 in 100 year level plus freeboard, which Council has adopted as 500mm. In Iluka, these levels are:

- RL3.0m, being RL2.5m flood level plus 500mm under the current adopted Flood Model (2013)
- RL3.6m under the 2022 Flood Model, being RL3.1m flood level plus 500mm freeboard, noting that Council is yet to adopt the 2022 level as interim 1 in 100 year climate change level.

The subject site has a level of approximately RL5.5m (see Survey Plan). As a result, it is not subject to this clause.

Clause (3) also only applies to land below the flood planning level and so does not apply.

Clause (4) is relevant as it applies to land between the flood planning area and the probably maximum flood, which is RL6.9m under the 2022 model and, although this has not been adopted as the interim level, it is assessed below.

(a) permit development in floodway areas,

COMMENT: Is not a floodway, complies.

(b) permit development that will result in significant flood impacts to other properties,

COMMENT: Insignificant impact when taken into account at a macrolevel the size of the lower Clarence floodplain and at a more micro level the amount of open space and bushland in the vicinity.

(c) permit a significant increase in the dwelling density of that land,

COMMENT: Does not increase dwelling density but does introduce accommodation into the locality. The inconsistency is justified on the grounds that it is of minor significance due to the proposed evacuation plan. It should be noted that the draft Housing Strategy also increases densities in the vicinity but again it would not be classed as significant.

(d) permit the development of centre-based childcare facilities, hostels, boarding houses, group homes, hospitals, residential care facilities, respite day care centres and seniors housing in areas where the occupants of the development cannot effectively evacuate,

COMMENT: None of these uses proposed and effective evacuation is available in accordance with the evacuation plan.

(e) are likely to affect the safe occupation of and efficient evacuation of the lot, or

COMMENT: No impact on safe occupation and efficient evacuation available in accordance with evacuation plan.

(f) are likely to result in a significantly increased requirement for government spending on emergency management services, and flood mitigation and emergency response measures, which can include but not limited to road infrastructure, flood mitigation infrastructure and utilities.

COMMENT: No impact, evacuation will be managed by motel/club staff.

Direction 4.2 Coastal Management

The property is located in the coastal zone and the proposal will enable increased development on the site, but it is not:

- Inconsistent with any relevant documents listed in 1 of the Direction
- Within a coastal vulnerability area – 2 (a)
- Identified as affected by coastal hazards – 2 (b)
- Within a coastal wetlands or littoral rainforest area – 3
- Proposing to amend maps associated with SEPP (Resilience & Hazards) 2021 - 4

Direction 4.3 Planning for Bushfire Protection

The majority of the property is mapped as bushfire buffer, with the closest forested area 90m to the north and separated from the motel site by the northern carpark and 2 bowling greens. The club engage Geolink to review the site and they advised: *“I don’t see any problems with this. As I’ve previously mentioned, the motel would need to be 67m from the hazard vegetation (based on flat to forest) which the croquet field location would meet.”*

The proposal was forwarded to the RFS who provided a Determination Letter (Annexure B). An assessment of Table 4.2.1 of the Planning for Bushfire Protection 2019 is at Annexure B. The Direction states:

(1) In the preparation of a planning proposal the relevant planning authority must consult with the Commissioner of the NSW Rural Fire Service following receipt of a gateway determination under section 3.34 of the Act, and prior to undertaking community consultation in satisfaction of clause 4, Schedule 1 to the EP&A Act, and take into account any comments so made.

COMMENT: The RFS have supplied a Determination Letter (Annexure J) which advises that they have no objection to the proposal and future development will need to comply with the requirements of *Planning for Bushfire Protection* which will be addressed at DA stage.

(2) A planning proposal must:

(a) have regard to Planning for Bushfire Protection 2019,

(b) introduce controls that avoid placing inappropriate developments in hazardous areas, and (c) ensure that bushfire hazard reduction is not prohibited within the Asset Protection Zone (APZ).

COMMENT: Correspondence from the RFS and comments from bushfire consultants have referred to “Planning for Bushfire Protection 2019”. Chosen location is not hazardous. No prohibition on APZ which already exists in club property.

(3) A planning proposal must, where development is proposed, comply with the following provisions, as appropriate:

(a) provide an Asset Protection Zone (APZ) incorporating at a minimum: i. an Inner Protection Area bounded by a perimeter road or reserve which circumscribes the hazard side of the land intended for development and has a building line consistent with the incorporation of an APZ, within the property, and ii. an Outer Protection Area managed for hazard reduction and located on the bushland side of the perimeter road,

COMMENT: The club, including bowling greens located between forested area and motel site is the APZ and is fully cleared.

(b) for infill development (that is development within an already subdivided area), where an appropriate APZ cannot be achieved, provide for an appropriate performance standard, in consultation with the NSW Rural Fire Service. If the provisions of the planning proposal permit Special Fire Protection Purposes (as defined under section 100B of the Rural Fires Act 1997), the APZ provisions must be complied with,

COMMENT: not applicable, APZ is achieved.

(c) contain provisions for two-way access roads which links to perimeter roads and/or to fire trail networks,

COMMENT: Excellent road network in vicinity.

(d) contain provisions for adequate water supply for firefighting purposes,

COMMENT: Club has booster pump for its own protection.

(e) minimise the perimeter of the area of land interfacing the hazard which may be developed,

COMMENT: Site is not located at perimeter of hazard area.

(f) introduce controls on the placement of combustible materials in the Inner Protection Area.

COMMENT: Combustibles would not be stored on bowling greens which provide de facto APZ.

Accordingly, it is considered the proposal complies with Direction 4.3

Direction 4.5 Acid Sulfate Soils

The property is mapped as Class 4 ASS and as a result this Direction applies. Its objective is to avoid significant adverse environmental impacts which the proposal achieves. Under Clause 7.1 of the Clarence Valley LEP 2011, development consent is required for the following in Class 4:

| Class of Land | Works |
|----------------------|---|
| 4 | Works more than 2 metres below the natural ground surface. Works by which the watertable is likely to be lowered more than 2 metres below the natural ground surface. |

No works associated with the construction of the motel will be more than 2m below natural surface level and the watertable will not be affected. As a result, any inconsistency is justified under “(b) of minor significance” as there is no impact.

SECTION C- ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

4.8 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?

NO

The Biodiversity Values Map shows no values on the property which reflects its long standing development and use. Any values relating to the adjoining Crown Reserve and Nature Reserve will be protected by the distance of the proposed motel site from that area.

4.9 Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

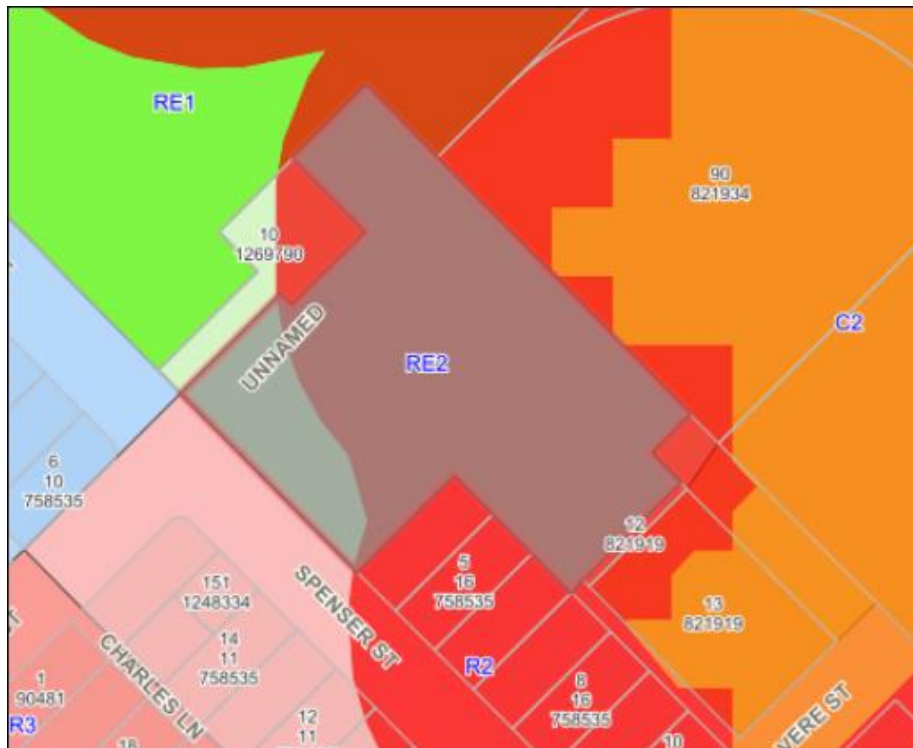


Figure 6- Bushfire prone land map

The majority of the property is mapped as bushfire buffer see Section 4.7 Direction 4.3.

4.10 Has the planning proposal addressed any social and economic effects?

4.10.1 Social Impacts

The Club is an important social and recreational hub in Iluka and the proposed motel will strengthen its financial foundations to allow it, as a non-profit organisation, to invest in its facilities and the community.

4.10.2 Economic Impacts

The General Manager has provided a statement (Annexure J) on the future viability of licensed clubs, and in particular bowling clubs, based on information from sources including a University of NSW academic study and Bowls NSW. It also includes information provided by Yamba Bowling Club and presented to Club Iluka members on 8 October 2023 by Yamba CEO, plus information provided by Maclean Bowling Club.

The picture the information paints is clear. Those clubs that continue to rely overwhelmingly on gaming revenue face a bleak future as governments move to

tighten limits on gambling. Those clubs that have moved to diversify, particularly into accommodation, are developing financial resilience which will protect them against future changes impacting on the bowling industry.

It is this situation that led to the Club commissioning the preparation of “Club Iluka – Proposed Motel Market and Financial Assessment” (Jenny Rand & Associates, September 2022) which concludes that there is an under supply of high end accommodation within Clarence Valley LGA. This accords the Clarence River Masterplan identifying a need for 4+ star tourist accommodation in towns along the Clarence. Specifically, it identified this shortfall in Iluka. It also states that motels adjacent to Licenced Clubs generally outperform other properties of the same standard.

Based on this information, the preliminary financial assessments for 12 and 20 room 4 star motels and the potential risk to its future without diversification, the Club has resolved to proceed with this project for the economic benefits it will realise for the Club and the Iluka community into the future.

SECTION D - STATE AND COMMONWEALTH INTERESTS

4.11 Is there adequate public infrastructure for the planning proposal?

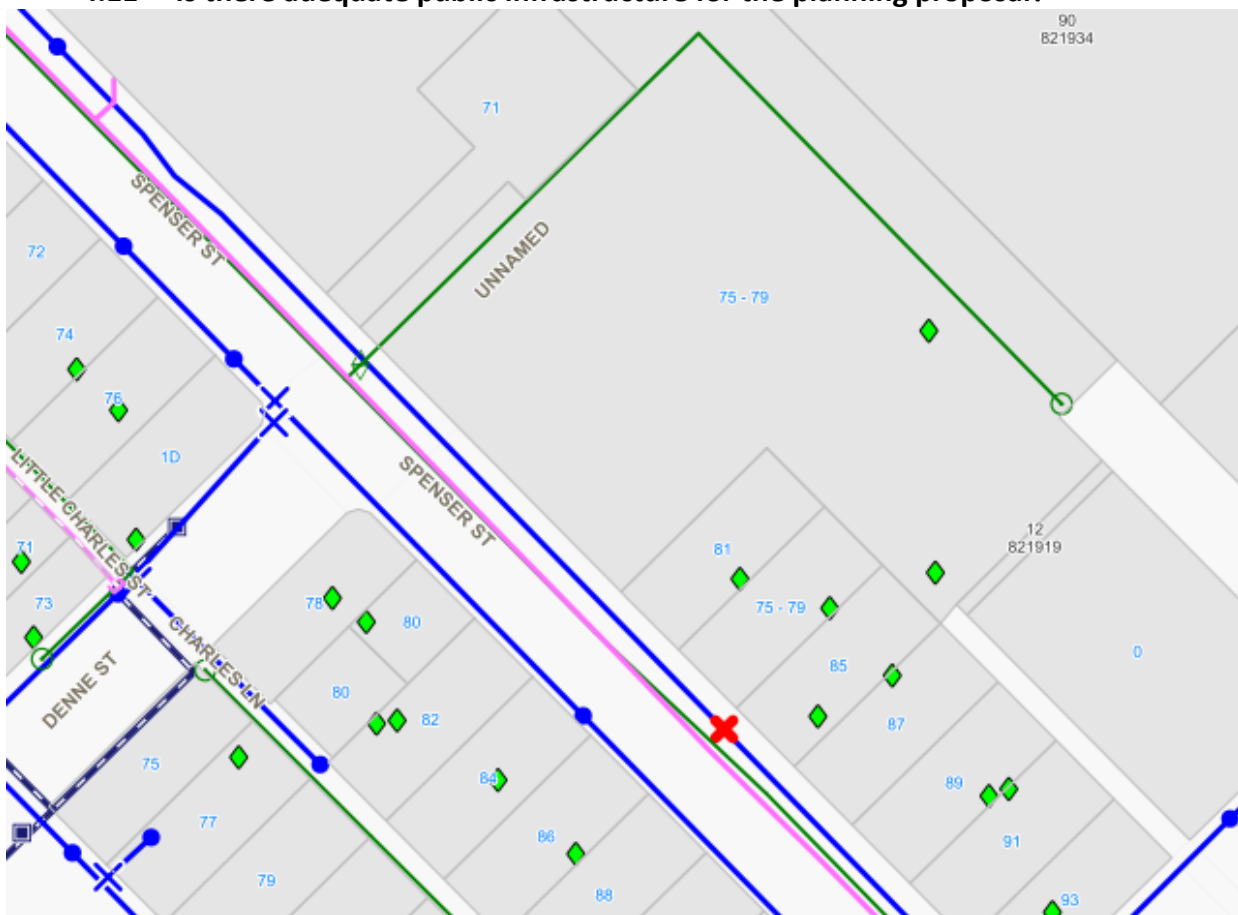


Figure 7 - CVC Assets Map

A 300mm watermain runs past the property in Spenser Street and a pressure sewer line runs along its western boundary servicing the Club. Council’s Development Engineering Section have advised that investigations will be required at detailed design stage to

determine capacity of the watermain and whether an additional pump will be required for the sewer system, and to specify any additional infrastructure that may need to be provided.

Power will be upgraded if required in accordance with Essential Energy requirements.

Spenser Street is fully formed with sufficient capacity to carry traffic generated by the motel.

4.12 What are the views of State and Commonwealth public authorities consulted in accordance with the gateway determination?

A scoping report was prepared and forwarded to Council and then to the Department of Planning & Environment and the comments from both organisations have been taken into account in the preparation of this proposal.

The proposal will be referred to appropriate authorities by Council.

5. PART 5 - MAPPING

Additional Uses Map and existing and proposed Height of Buildings Maps are attached at Annexure A.

6. PART 6 - COMMUNITY CONSULTATION

The proposal is "Standard" under the 2021 Guidelines requiring exhibition for 20 working days.

7. PART 7 - PROJECT TIMELINE

| MILESTONE | DATE/S | COMMENT |
|---|-----------------|---|
| 1. Gateway Determination | 30/8/2024 | Approved to proceed through Gateway following minor amendments. |
| 2. Agency Consultation | 20 Sept - 4 Nov | |
| 3. Public Exhibition | 20 Sept - 4 Nov | |
| 4. Public Hearing | N/A | |
| 5. Consideration of submissions | Nov - Dec 2024 | |
| 6. Post-exhibition consideration of PP | Jan - Feb 2025 | |
| 7. RPA intends to make the Plan | by March 2025 | |
| 8. RPA intends to forward Plan to Dept for notification | by 30 May 2025 | |

ANNEXURE A – ADDITIONAL USES MAP, EXISTING & PROPOSED HEIGHT OF BUILDINGS MAPS

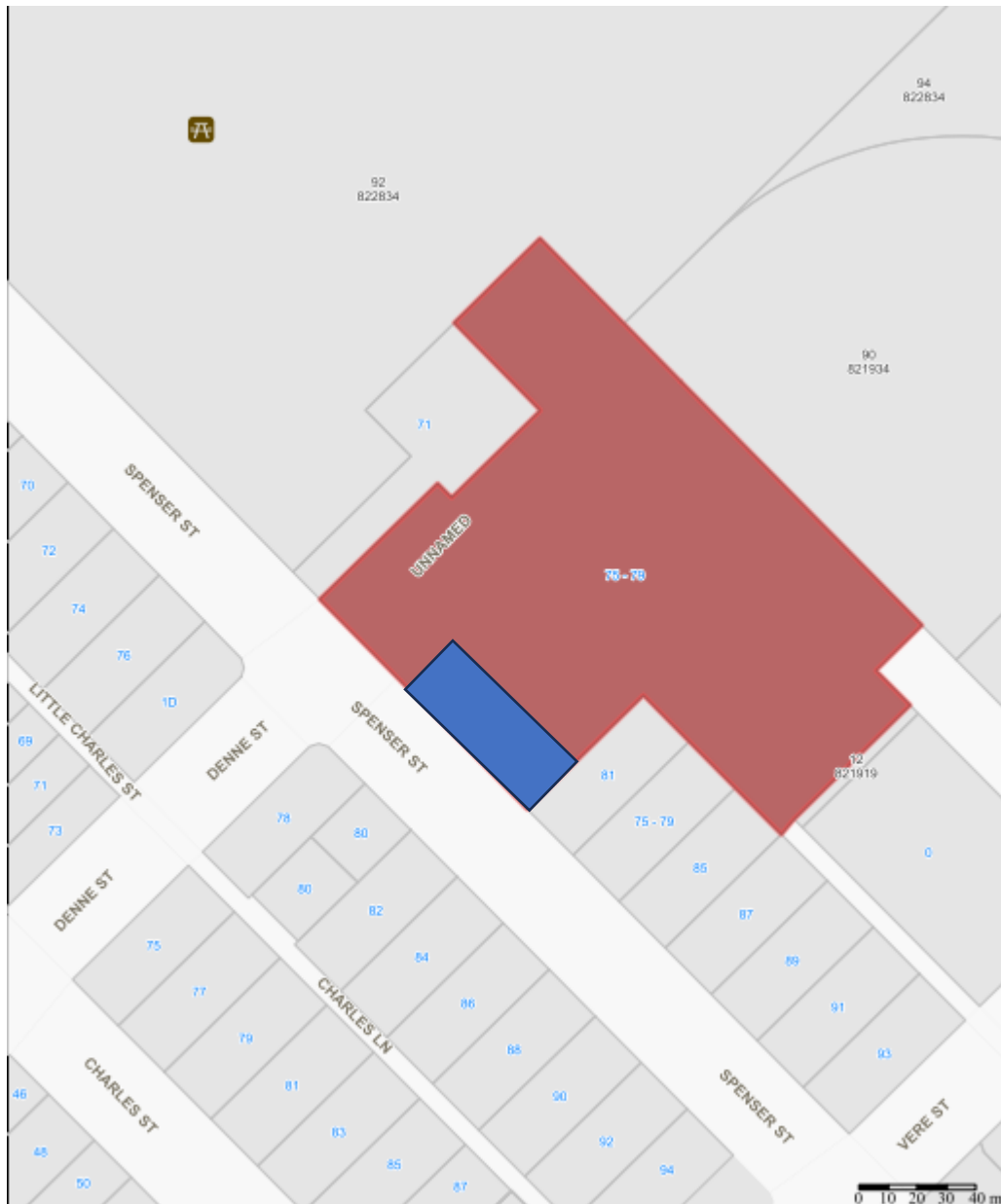


Figure 1 Additional Uses Map

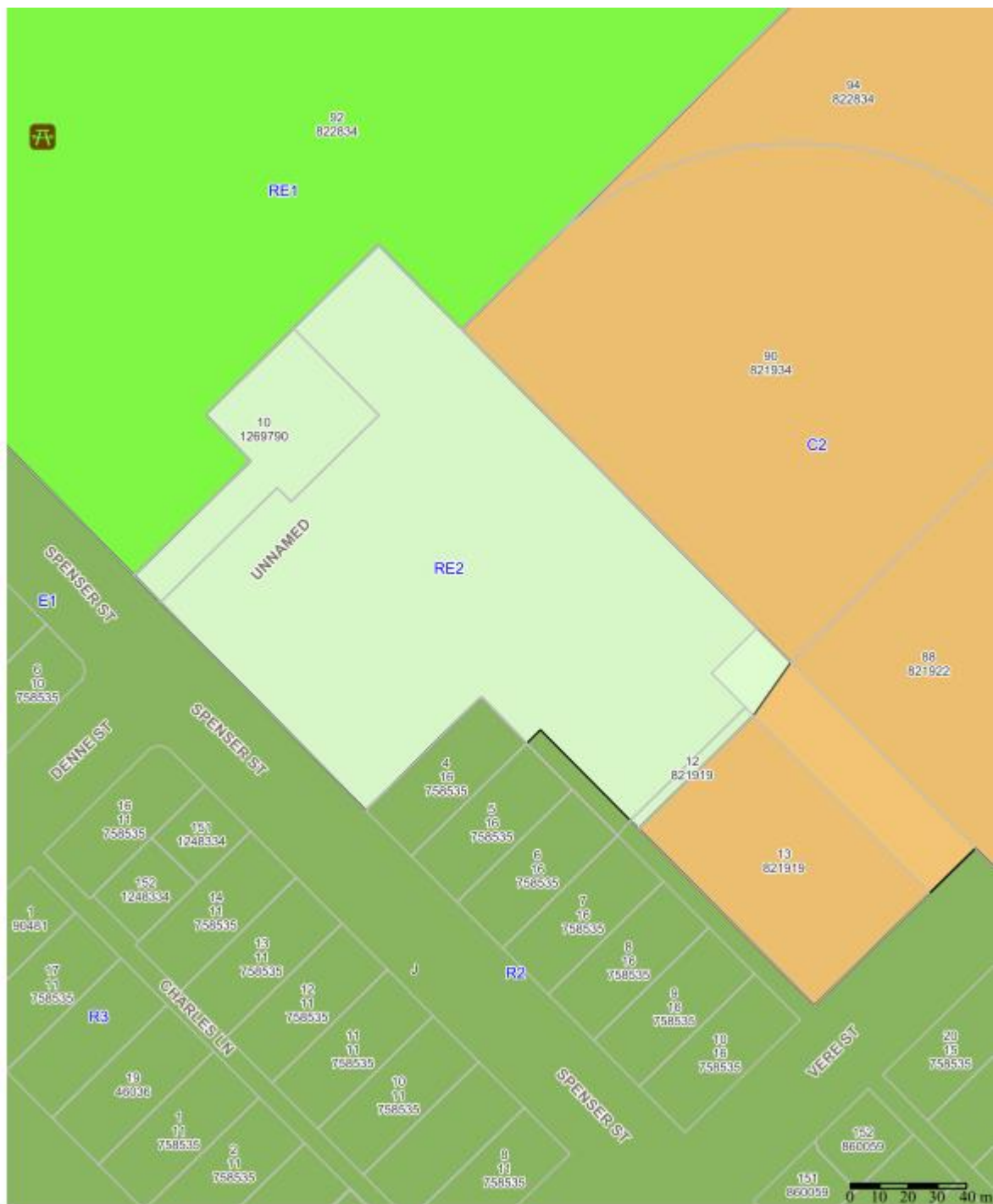


Figure 2 Existing Height of Buildings Map

Height of Buildings Map

Maximum Building Height (m)

| | |
|---|-----|
| F | 6.5 |
| J | 9 |
| K | 10 |
| M | 12 |
| N | 14 |

Cadastre

Cadastre 13/05/2024 ©NSW Spatial services

Planning Proposal

Subject land

This map is for explanation purposes only.
This map is not a legal document.



Projection GDA 1994
MGA Zone 56

0 13 26 m

Scale 1:750 @ A3 Landscape

Map Identification Number:





NSW RURAL FIRE SERVICE

Clarence Valley Council
Locked Bag 23
GRAFTON NSW 2460

Your reference: Dated 30/1/23
Our reference: SPI20230202000014

ATTENTION: Jasmine Oakes

Date: Friday 21 April 2023

Dear Sir/Madam,

**Strategic Planning Instrument
LEP Amendment – Draft Proposal**

Clarence Valley Local Environmental Plan 2011, Schedule 1 'Additional permitted Use' to allow tourist and visitor accommodation

I refer to your correspondence dated 30/01/2023 inviting the NSW Rural Fire Service (NSW RFS) to comment on the above Strategic Planning document.

The NSW RFS has considered the information submitted and provides the following comments.

Iluka nature reserve borders the property to the north and east. The nature reserve promotes a significant fire run towards the land and Iluka village.

The NSW RFS has no objection to the LEP Amendment. Future development shall comply with the requirements of *Planning for Bush Fire Protection*. Any new tourism accommodation development will not be considered as SFPP Infill and will be required to have sufficient setbacks from the bushfire hazard to enable the protection of life and property.

For any queries regarding this correspondence, please contact Alan Bawden on 1300 NSW RFS.

Yours sincerely,

Allyn Purkiss
**Manager Planning & Environment Services
Built & Natural Environment**

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
4 Murray Rose Ave
SYDNEY OLYMPIC PARK NSW 2127

T (02) 8741 5555
F (02) 8741 5550
www.rfs.nsw.gov.au

Table 4.2.1

Bush Fire Strategic Study

| ISSUE | DETAIL | ASSESSMENT CONSIDERATIONS |
|---------------------------------------|---|---|
| Bush fire landscape assessment | A bush fire landscape assessment considers the likelihood of a bush fire, its potential severity and intensity and the potential impact on life and property in the context of the broader surrounding landscape. | <ul style="list-style-type: none"> ➤ The bush fire hazard in the surrounding area, including: <ul style="list-style-type: none"> ➤ Vegetation ➤ Topography ➤ Weather ➤ The potential fire behaviour that might be generated based on the above; ➤ Any history of bush fire in the area; ➤ Potential fire runs into the site and the intensity of such fire runs; and ➤ The difficulty in accessing and suppressing a fire, the continuity of bush fire hazards or the fragmentation of landscape fuels and the complexity of the associated terrain. |
| Land use assessment | The land use assessment will identify the most appropriate locations within the masterplan area or site layout for the proposed land uses. | <ul style="list-style-type: none"> ➤ The risk profile of different areas of the development layout based on the above landscape study; ➤ The proposed land use zones and permitted uses; ➤ The most appropriate siting of different land uses based on risk profiles within the site (i.e. not locating development on ridge tops, SFPP development to be located in lower risk areas of the site); and ➤ The impact of the siting of these uses on APZ provision. |
| Access and egress | A study of the existing and proposed road networks both within and external to the masterplan area or site layout. | <ul style="list-style-type: none"> ➤ The capacity for the proposed road network to deal with evacuating residents and responding emergency services, based on the existing and proposed community profile; ➤ The location of key access routes and direction of travel; and ➤ The potential for development to be isolated in the event of a bush fire. |
| Emergency services | An assessment of the future impact of new development on emergency services. | <ul style="list-style-type: none"> ➤ Consideration of the increase in demand for emergency services responding to a bush fire emergency including the need for new stations/brigades; and ➤ Impact on the ability of emergency services to carry out fire suppression in a bush fire emergency. |
| Infrastructure | An assessment of the issues associated with infrastructure and utilities. | <ul style="list-style-type: none"> ➤ The ability of the reticulated water system to deal with a major bush fire event in terms of pressures, flows, and spacing of hydrants; and ➤ Life safety issues associated with fire and proximity to high voltage power lines, natural gas supply lines etc. |
| Adjoining land | The impact of new development on adjoining landowners and their ability to undertake bush fire management. | <ul style="list-style-type: none"> ➤ Consideration of the implications of a change in land use on adjoining land including increased pressure on BPMs through the implementation of Bush Fire Management Plans. |

ANNEXURE B

BUSHFIRE STRATEGIC STRATEGY TABLE 4.2.1 ASSESSMENT

| ISSUE | COMMENT |
|--------------------------------|---|
| Bush fire landscape assessment | The surrounding area is flat and consists of bowling greens, the club buildings and carpark, recreation fields and forests 90m away to the north and north-east. The club's bushfire consultants (Geolink) have advised by email that <i>'the motel would need to be 67m from the hazard vegetation (based on flat to forest) which the croquet field location would meet.'</i> Forest areas are easily accessible for firefighting purposes as there is a carpark along the northern boundary. |
| Land use assessment | The proposed location is the furthest area from the hazard vegetation on the club property. |
| Access and egress | There is an extensive and well maintained road network in the vicinity suitable for evacuation and responding emergency vehicles. The majority of these lead away from the hazard vegetation, so the motel will not be isolated. |
| Emergency services | If there was a bushfire in the adjoining vegetation the local brigade would respond to protect the club and ambulance station whether the motel was there or not. |
| Infrastructure | The club has booster pumps for its own protection. |
| Adjoining land | No impact on adjoining land from the motel in respect of bushfire issues. |

ANNEXURE C

NORTH COAST REGIONAL PLAN 2041 OBJECTIVES CHECKLIST

| Objective | Applicable | Comment |
|--|------------|---|
| Goal 1: Liveable, sustainable and resilient | | |
| Objective 1: Provide well located homes to meet demand | NO | |
| Objective 2: Provide for more affordable and low cost housing | NO | |
| Objective 3: Protect regional biodiversity and areas of high environmental value. | NO | |
| Objective 4: Understand, celebrate and integrate Aboriginal culture | NO | |
| Objective 5: Manage and improve resilience to shocks and stresses, natural hazards and climate change | YES | The property is mapped a predominately bushfire Buffer. RFS determination letter stating they have no objection to the proposal is attached at Annexure J |
| Objective 6: Create a circular economy | NO | |
| Objective 7: Promote renewable energy opportunities | NO | The motel will include compulsory measures and may incorporate additional measures. |
| Objective 8: Support the productivity of agricultural land. | NO | |
| Objective 9: Sustainably manage and conserve water resources | YES | The motel will be designed to be water efficient. |
| Objective 10: Sustainably manage the productivity of our natural resources. | NO | |
| Goal 2: Productive and connected | | |
| Objective 11: Support cities and centres and coordinate the supply of well-located employment land. | YES | The property is located in a centre and will provide additional employment in the town. |
| Objective 12: Create a diverse visitor economy | YES | Meets the objectives of focussing on ecotourism due to its location and providing smaller scale coastal tourism accommodation, see 4.3 |
| Objective 13: Champion Aboriginal self-determination | NO | |
| Objective 14: Deliver new industries of the future | NO | |
| Objective 15: Improve state and regional connectivity | NO | |
| Objective 16: Increase active and public transport usage. | NO | |
| Objective 17: Utilise new transport technology. | NO | |
| Goal 3: Growth Change and Opportunity | | |
| Objective 18: Plan for sustainable communities. | NO | |
| Objective 19: Public spaces and green infrastructure support connected and healthy communities. | NO | |
| Objective 20: Celebrate local character. | YES | Iluka has a coastal living and tourism character which will be enhanced by the motel. |

ANNEXURE D LSPS ASSESSMENT

| LSPS Action | LSPS Action (guiding Principle) | Applicable | Complies (Y/N or N/A) | Detailed Answer |
|-------------|---|------------|---|--|
| 1.1 | <p>Does the proposal promote the long term liveability, health and resilience of the community, and supporting economic, social and cultural improvement?</p> <p>Particularly through:</p> <p>a) Protecting and enhancing terrestrial and aquatic biodiversity and our natural environment?</p> <p>b) A regenerative landscape planning approach that includes listening to First Nations People and caring for country?</p> <p>c) A hierarchy of avoiding, mitigating and managing natural hazards, as well as considering environmental constraints to be used in planning and design?</p> <p>d) Ensuring a collaborative approach to place making, that engages those who can contribute to making the Clarence Valley a community full of opportunities?</p> <p>e) North Coast Settlement Planning Guidelines 2019?</p> | All | <p>Y</p> <p>Y</p> <p>Y</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> | <p>Supports economic and social improvement with no significant impact on any of the other elements.</p> <p>Will have no impact on terrestrial or aquatic biodiversity.</p> <p>AHIMS Report, attached at Annexure I and no sites or items in vicinity.</p> |
| 1.2 | <p>Does the proposal comply with the North Coast Urban Design Guidelines?</p> <p>Does the proposal comply with the Urban Design for Regional NSW guidelines?</p> | All | N/A | The future motel will reference these guidelines during the design phase. |
| 2.1 | <p>Does the proposal / process help expand existing partnerships with our First Nations communities to be involved in decision making?</p> <p>Have you referred to the NSW Government Architect 'Connecting with Country' and Designing with Country guidelines?</p> | All | N/A | |

ANNEXURE D LSPS ASSESSMENT

| | | | | |
|--------------------|--|------------------------------------|------------------------------|---|
| 2.2 | Are First Nations communities involved in the development of strategic plans, inclusive of local growth management, housing and biodiversity strategies? | Strategic plans | N/A | |
| LSPS Action | LSPS Action (guiding Principle) | Applicable | Complies (Y/N or N/A) | Detailed Answer |
| 2.3 | Has the proposal involved collaboration with Traditional Owners, Local Aboriginal Land Councils and DPIE in identifying sites of cultural significance and assets with economic development potential? | All | Y | AHIMS search attached at Annexure I – no places or items identified. |
| 2.5 | Have you considered the Clarence Valley Aboriginal Heritage Study and relevant studies and planning controls? | All | N/A | |
| 2.6 | Does the proposal incorporate First Nations cultural heritage and design in new developments? | Construction / design projects | N/A | Will be considered in design phase. |
| 3.3 | For any expansion of existing commercial or industrial lands or new development – is appropriate infrastructure that promotes active travel to work options included (walking, cycling, PT, accessibility etc.)? | All | N/A | Is within walking and cycling distance of many facilities and attractions in Iluka. |
| 3.4 | Have you explored options to promote smaller homes in appropriate locations of our existing centres to help achieve a target of 40% infill housing across the Clarence LGA? | Strategic planning | N/A | |
| 4.3 | Does the proposal comply with the Clarence Valley Affordable Housing Strategies, Plans and Policies ? | All | N/A | |
| 5.2 | Does the proposal comply with the Crime Prevention Through Environmental Design (CPTED) and Safer by Design Evaluation? | Construction / design projects | N/A | Will be considered during design phase. |
| 5.5 | Are there opportunities to involve School Infrastructure NSW (SINSW) to explore and implement joint and shared use opportunities where there is mutual benefit for the school and the community? | All | N/A | |
| 6.4 | Is the re-use of Grafton Gaol and the Health Precinct sympathetic to the character of the surrounding streets and aspirations for the economic vitality of the Grafton CBD? | Grafton gaol and hospital precinct | N/A | |

ANNEXURE D LSPS ASSESSMENT

| | | | | |
|--------------------|--|------------------------------------|------------------------------|--|
| 7.3 | Have you explored options with state government (esp. TfNSW) and infrastructure providers to accelerate the provision of infrastructure and availability of residential and employment land to support a growing community and job opportunities in the Clarence Valley, where appropriate? | Strategic plans and major projects | N/A | Proposal will provide facility which will generate employment. |
| LSPS Action | LSPS Action (guiding Principle) | Applicable | Complies (Y/N or N/A) | Detailed Answer |
| 7.4 | Working with State government, do facilities and redevelopment (Hospitals, Education, Corrections etc.) provide supporting infrastructure which will support a healthy, prosperous and sustainable Clarence Valley community, including for walking, cycling and other active travel? Will an 'active travel plan' be prepared to promote walking, cycling and sustainable modes of travel? | NSW Government projects | N/A | |
| 8.1 | Have you checked with TfNSW and other stakeholders to identify any impacts on major transport corridors and ensure they are protected for future transport alignments and avoid the encroachment of incompatible land uses? | Strategic plans and major projects | N/A | |
| 9.2 | Have you checked with SES, RFS and other emergency management authorities that the proposal will help make a more resilient community? | All | Y | RFS determination letter attached at Annexure J |
| 9.3 | Do Infrastructure proposals include the provision of 'green infrastructure' as well as its integration with recreation and open space planning? Have you considered the governments Greener Places guideline? | All | Y | Integrates with the Club's recreational activities. |
| 10.2 | Will the proposal help implement the TfNSW TfNSW Movement and Place Framework ? Have you checked with TfNSW? Will the proposal help to promote active transport, including opportunities to develop an active transport network, through the development of an integrated transport and land use settlement | All | N/A | |

ANNEXURE D LSPS ASSESSMENT

| | strategy for the valley, along with a 'place plan' for key centres such as Grafton, and areas of 'investigation' for urban development? | | | |
|-------------|--|-----------------|-----------------------|---|
| LSPS Action | LSPS Action (guiding Principle) | Applicable | Complies (Y/N or N/A) | Detailed Answer |
| 11.1 | Does the proposal help implement the Clarence Valley Regional Economic Development Strategy ? | All | | Tourism is identified as an 'engine of growth' and the proposal will assist in achieving Strategy 2 dealing with tourism. |
| 11.4 | Will the proposal help promote job opportunities in the marine industries? Does the proposal accord with the Far North Coast & Mid North Coast Marine based Industry Policy ? | All | N/A N/A | |
| 12.1 | Does the proposal help support Grafton CBD as the principal activity centre for business, retail, culture, entertainment and prestige events in the region? | All | N/A | |
| 13.2 | Have you examined opportunities to leverage proximity to Gold Coast Airport and Toowoomba Wellcamp Airport in the supply chain for products from the Clarence Valley? | All | N/A | Pacific Motorway provides access to these facilities. |
| 13.3 | Does the proposal help to protect rural zoned land and productive agricultural land from urban and rural residential development by directing development to identified investigation areas and not adjacent to productive agricultural land? Does the proposal help to implement state government policy, such as the 'right to farm'? | All | N/A | |
| 13.4 | Does the proposal help to implement the North Coast farmland mapping project undertaken by DPI and DPIE, supplemented with local studies? | All | N/A | |
| 13.5 | Have you explored opportunities for artisan food and drink industry developments to be located within existing business zones and centres to improve the vitality and viability of our main streets, particularly in Grafton and Yamba? | Strategic Plans | N/A | |

ANNEXURE D LSPS ASSESSMENT

| LSPS Action | LSPS Action (guiding Principle) | Applicable | Complies (Y/N or N/A) | Detailed Answer |
|-------------|---|------------|--|-----------------|
| 13.6 | <p>Does the proposal help to implement work by relevant agencies to support bushfire recovery and future resilience of the agriculture and food producing sector of the Clarence?</p> <p>Does the proposal help to establish networks and training opportunities for primary producers to work with local First Nations to improve land management, especially cultural burning?</p> | All | N/A | . |
| 13.7 | Does the proposal identify opportunities to increase resilience of rural landscapes and promote regenerative agriculture, especially to increase carbon in soils to improve productive capacity, contribute to reducing atmospheric CO2, increase water holding capacity of soil so reducing drought impact and significantly reducing the effects of runoff and soil erosion on roads, bridges and other infrastructure? | All | N/A | |
| 13.8 | <p>Does the proposal help to:</p> <p>a) reduce the density and proximity of energy dense nutrient poor (ENDP) aka 'fast food' outlets, particularly for vulnerable populations?</p> <p>b) facilitate community gardens and urban agriculture on public and private land, particularly in new land release areas and urban fringes so that neighbourhoods have access to local food growing lands?</p> <p>c) increase access to drinking water through the provision of bubbler/taps in public places, sporting venues and community facilities, and limit/discourage the consumption of sugar sweetened beverages (SSBs)?</p> <p>d) support and encourage community food centres (aka food hubs) which supply and promote locally grown produce and take a social justice approach to food?</p> <p>e) support and encourage local farmers markets which supply local produce thereby reducing food miles and supporting local and regional farmers?</p> | All | <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> <p>N/A</p> | |

ANNEXURE D LSPS ASSESSMENT

| LSPS Action | LSPS Action (guiding Principle) | Applicable | Complies (Y / N or N/A) | Detailed Answer |
|-------------|---|-----------------|-------------------------|--|
| 14.1 | Does the change to the planning framework help to implement the Clarence River Way Masterplan ? Will the proposal help to welcome and sustainably manage visitors to the area, particularly to enable appropriate development in Grafton and our river towns and coastal areas? | All | Y | Yes, will provide higher end tourism facility in the river town as envisaged in Direction D3.2 of this Masterplan. |
| 14.2 | Does the proposal help to update the Clarence Valley LEP and relevant DCPs to build on the strengths of the Clarence River and support appropriate tourism opportunities and help implement aspects of the Clarence River Way Masterplan? | Strategic Plans | Y | Will implement aspects of the Masterplan. |
| 14.3 | Does the proposal help to identify opportunities to expand nature-based adventure and cultural tourism by leveraging the Clarence Valleys natural, heritage and community assets? | All | Y | Proximity to Iluka Nature Reserve and walking track, a prime ecotourism destination in the lower valley. |
| 15.1 | Will the proposal help to protect areas of High Environmental Value (HEV)? Does the proposal take a strategic approach to land use planning, informed by our biodiversity strategy and strategic environmental goals, particularly for corridors and areas of high environmental value? | All | Y N/A | Will have no impact on adjoining Reserves |
| 15.2 | Does the proposal help to achieve waterway health and protect our marine environment? | Strategic plans | N/A | |
| 15.3 | Will the proposal help to ensure that water quality and aquatic biodiversity impacts are considered in planning decisions? Will the changes ensure that the planning framework aligns with our coast and estuary management plans/programs, including to promote the values of riparian vegetation vegetated buffers and permeable surfaces to maintain and improve water quality and hydrology? | All | Y N/A | Stormwater management system will protect water quality, details to be submitted with a DA. |
| 16.2 | Have you checked biodiversity mapping layers and fauna corridors with Council? | All | N/A | No vegetation affected. |

ANNEXURE D LSPS ASSESSMENT

| LSPS Action | LSPS Action (guiding Principle) | Applicable | Complies (Y/N or N/A) | Detailed Answer |
|-------------|--|------------|-----------------------|--|
| 16.6 | Does the proposal help implement Councils Biodiversity Strategy 2020? | All | N/A | |
| 17.1 | Does the proposal help create safer, more disaster resilient communities? Have you had particular regard to the long term social and economic costs of the potential effects of natural hazards and risk to life and evacuation capacity? | All | N/A N/A | Future DA will be referred to RFS but preliminary assessment is that the proposal site has adequate separation from the Bushfire hazard. |
| 18.3 | Does the proposal consider the Clarence Valley Regional Water Efficiency Strategic Plan ? | All | N/A | Future motel may incorporate water efficiency and reuse elements. |
| 19.1 | Does the proposal help to sustainably manage natural, mineral and forestry resources? (e.g. Protecting quarry's from urban encroachment and vice versa) | All | N/A | |
| 20.1 | Does the proposal help to grow regional and sub-regional relationships with adjoining Councils, state government and other organisations? | All | N/A | |
| 21.1 | Does the proposal help increase community participation in decision making and comply with the Councils Community Participation Plan ? | All | Y | Proposal will be put on public exhibition. |
| 22.1 | Will the proposal help Grafton to be recognised as a Regional City in the North Coast Regional Plan? | All | N/A | |
| 23.1 | Will the proposal help achieve the Priorities of the Local Strategic Planning Statement? | All | Y | Refer to Section 4.1 |

ANNEXURE E

COUNCILS STRATEGIC PLANS CONSISTENCY CHECKLIST

| | Strategy/Strategic Plan | Relevant component/statement of consistency |
|----|---|---|
| 1 | The Clarence 2032 | In keeping with the Economy theme, it will provide financial resilience and variety for the Club and add to the stock of tourist accommodation in Iluka and the lower Valley, with economic knock-on benefits for local businesses. |
| 2 | Council's 2022-2025 Delivery Program | The 2022-2025 Delivery program complies with and assists in achieving the strategy under Objective 6 of Economy "Attract new investment and achieve employment growth within the Valley". |
| 3 | Operational Plan 2022/2023 | No direct relevance. |
| 4 | Maclean Urban Catchment Local Growth Management Strategy 2011 | Not Applicable |
| 5 | South Grafton Heights Precinct Strategy | Not Applicable |
| 6 | Clarence Valley Settlement Strategy | See Section 4.4.3 |
| 7 | Lower Clarence Retail Strategy (May 2007) | This Strategy may have been superseded by the Employment Lands Strategy but it does include the following strategy: <ul style="list-style-type: none"> Allow for minor expansion of the Iluka retail sector through improved concentration of retail services and provision of convenience-based retailing. The proposal will not directly involve retailing but will potentially provide additional customers to the retail centre. |
| 8 | Yamba Retail/Commercial Strategy (May 2002) | Not Applicable |
| 9 | Clarence Valley Regional Economic Development Strategic Plan | Addressed in Section 4.1.1 |
| 10 | Clarence Valley Employment Land Strategy 2022 | Addressed in Section 4.4.2 |
| 11 | Clarence Valley Affordable Housing Strategy | Not Applicable |
| 12 | Clarence Valley Council Biodiversity Management Strategy 2010 | Will have no biodiversity impacts |
| 13 | Clarence River Way Masterplan II (2021) | Addressed in Section 4.1.2 |
| 14 | Clarence Valley Open Spaces Strategic Plan 2012 | Not Applicable |
| 15 | Clarence Valley Local Strategic Planning Statement (2020) | Addressed in Section 4.4.1 |

ANNEXURE F

STATE ENVIRONMENTAL PLANNING POLICIES CONSISTENCY CHECKLIST

| Name of SEPP | Relevant/applicable? | Comment/statement of consistency |
|--|----------------------|---|
| <i>The following consolidated State Environmental Planning Policies (SEPPs) are current from March 2022 and whilst not all may be applicable to the Clarence Valley LGA they are all being acknowledged and some are considered in more detail where relevant.</i> | | |
| 1. State Environmental Planning Policy (Primary Production) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 2. State Environmental Planning Policy (Resources and Energy) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 3. State Environmental Planning Policy (Resilience and Hazards) 2021 | YES | No inconsistencies, see Section 4.6 and Annexure H |
| 4. State Environmental Planning Policy (Industry and Employment) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 5. State Environmental Planning Policy (Transport and Infrastructure) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 6. State Environmental Planning Policy (Biodiversity and Conservation) 2021 | NO | No biodiversity or conservation impacts. |
| 7. State Environmental Planning Policy (Planning Systems) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 8. State Environmental Planning Policy (Precincts – Eastern Harbour City) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 9. State Environmental Planning Policy (Precincts – Central River City) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 10. State Environmental Planning Policy (Precincts – Wester Parkland City) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 11. State Environmental Planning Policy (Precincts – Regional) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 12. State Environmental Planning Policy (Housing) 2021 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 13. State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |
| 14. State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 | NO | Will be addressed at DA stage. |
| 15. State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 | NO | Matters addressed in the Policy are not relevant to the site or Proposal. |

ANNEXURE G

SECTION 9.1(2) DIRECTIONS CONSISTENCY CHECKLIST

| SECTION 9.1 DIRECTION | CONSISTENCY | COMMENTS |
|---|----------------|--|
| 1.1 Implementation of Regional Plans | Consistent | The majority of Objectives are not relevant and the proposal is consistent with those that are, see Section 4.3 which refers to Objective 12 – Create a Diverse Visitor Economy. |
| 1.2 Development of Aboriginal Land Council Land | Not Applicable | |
| 1.3 Approval and Referral Requirements | Consistent | The proposal does not include provisions that require the concurrence, consultation or referral of applications to a Minister or public authority. |
| 1.4 Site Specific Provisions | Consistent | In this instance the proposal will allow the additional use the proposal is seeking. |
| 1.5 Parramatta Road Corridor Urban Transformation Strategy | Not Applicable | |
| 1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan | Not Applicable | |
| 1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan | Not Applicable | |
| 1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan | Not Applicable | |
| 1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor | Not Applicable | |
| 1.10 Implementation of the 1.14 Western Sydney Aerotropolis Plan | Not Applicable | |
| 1.11 Implementation of Bayside West Precincts 2036 Plan | Not Applicable | |
| 1.12 Implementation of Planning Principles for the Cooks Cove Precinct. | Not Applicable | |

ANNEXURE G

| SECTION 9.1 DIRECTION | CONSISTENCY | COMMENTS |
|---|----------------|---------------------------------------|
| 1.13 Implementation of St Leonards and Crows Nest 2036 Plan. | Not Applicable | |
| 1.14 Implementation of Greater Macarthur 2040 | Not Applicable | |
| 1.16 North West Rail Link Corridor Strategy | Not Applicable | |
| 1.17 Implementation of the Bays West Place Strategy. | Not Applicable | |
| 1.18 Implementation of the Macquarie Park Innovation Precinct | Not Applicable | |
| 1.19 Implementation of the Westmead Place Strategy | Not Applicable | |
| 1.20 Implementation of the Camellia-Rosehill Place Strategy | Not Applicable | |
| 1.21 Implementation of South West Growth Area Structure Plan | Not Applicable | |
| 1.22 Implementation of the Cherrybrook Station Place Strategy | Not Applicable | |
| 3.1 Conservation Zones | Not Applicable | |
| 3.2 Heritage Conservation | Not Applicable | |
| 3.3 Sydney Drinking Water Catchments | Not Applicable | |
| 3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North coast LEPs | Not Applicable | Does not apply to Clarence Valley LGA |
| 3.5 Recreation Vehicle Areas | Not Applicable | |
| 3.6 Strategic Conservation Planning | Not Applicable | |
| 3.7 Public Bushland | Not Applicable | |
| 3.8 Willandra Lakes Region | Not Applicable | |
| 3.9 Sydney Harbour Foreshore and Waterways Area | Not Applicable | |

ANNEXURE G

| SECTION 9.1 DIRECTION | CONSISTENCY | COMMENTS |
|---|----------------------------|--|
| 3.10 Water Catchment Protection | Not Applicable | |
| 4.1 Flooding | Minor inconsistency | The site is mapped as flood free on Council's Flood Map. Minor inconsistency which relates to dwelling density is justified due to its minor significance. |
| 4.2 Coastal Management | Consistent | See Section 4.7 and Annexure K |
| 4.3 Planning for Bushfire Protection | Consistent | See Section 4.7 and Annexure B |
| 4.4 Remediation of Contaminated Land | Not Applicable | |
| 4.5 Acid Sulfate Soils | Inconsistent but Justified | Mapped as Class 4 ASS, see comments at 4.7 |
| 4.6 Mine Subsidence and Unstable land | Not Applicable | |
| 5.1 Integrating Land Use and Transport | Not Applicable | |
| 5.2 Reserving land for Public Purposes | Not Applicable | |
| 5.3 Development Near Regulated Airports and Defense Airfields | Not Applicable | |
| 5.4 Shooting Ranges | Not Applicable | |
| 6.1 Residential Zones | Not Applicable | |
| 6.2 Caravan Parks and Manufactured Home Estates | Not Applicable | |
| 7.1 Business and Industrial Zones | Not Applicable | Not directly applicable but the Direction objectives includes "encourage employment growth in suitable locations" which the proposal will achieve. |
| 7.2 Reduction in non-hosted short-term rental accommodation period. | Not Applicable | |
| 7.3 Commercial and Retail Development along the Pacific Highway, North Coast. | Not Applicable | |
| 8.1 Mining, Petroleum Production and Extractive Industries | Not Applicable | |
| 9.1 Rural Zones | Not Applicable | |

ANNEXURE G

| SECTION 9.1 DIRECTION | CONSISTENCY | COMMENTS |
|---|----------------|----------|
| 9.2 Rural Lands | Not Applicable | |
| 9.3 Oyster Aquaculture | Not Applicable | |
| 9.4 Farmland of State and Regional Significance on the NSW Far North Coast. | Not Applicable | |

ANNEXURE H

SEPP (RESILIENCE & HAZARDS) 2021 Chapter2 Coastal Management Assessment

The site is located in the Coastal Zone and mapped as Coastal Environment Area and Coastal Use Area.

The relevant clauses are as follows:

2.10 Development on land within the coastal environment area

(1) *Development consent must not be granted to development on land that is within the coastal environment area unless the consent authority has considered whether the proposed development is likely to cause an adverse impact on the following—*

(a) *the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment,*

COMMENT: Will have no impact on the environment due to its location on the current croquet green and the protection of water quality through the stormwater management system which will be provided with the development.

(b) *coastal environmental values and natural coastal processes,*

COMMENT: No impact from or on coastal values or processes.

(c) *the water quality of the marine estate (within the meaning of the [Marine Estate Management Act 2014](#)), in particular, the cumulative impacts of the proposed development on any of the sensitive coastal lakes identified in Schedule 1,*

COMMENT: No Impact

(d) *marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,*

COMMENT: No Impact

(e) *existing public open space and safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,*

COMMENT: No Impact

(f) *Aboriginal cultural heritage, practices and places,*

COMMENT: No impact due to site being located within the Club complex; AHIMS search attached at Annexure I.

(g) *the use of the surf zone.*

COMMENT: No Impact

In respect of Clause 2.10 (2), there are no impacts to avoid or minimise.

2.11 Development on land within the coastal use area

(1) *Development consent must not be granted to development on land that is within the coastal use area unless the consent authority—*

(a) has considered whether the proposed development is likely to cause an adverse impact on the following—

(i) existing, safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,

COMMENT: No impact

(ii) overshadowing, wind funnelling and the loss of views from public places to foreshores,

COMMENT: No impact

(iii) the visual amenity and scenic qualities of the coast, including coastal headlands,

COMMENT: No impact

(iv) Aboriginal cultural heritage, practices and places,

COMMENT: No impact, see AHIMS search. Any sites located in the surrounding Nature Reserve are under the management of NPWS.

(v) cultural and built environment heritage, and

COMMENT: No impact

In respect of Clause 2.11(b), there are no impacts to avoid or minimise.

(c) has taken into account the surrounding coastal and built environment, and the bulk, scale and size of the proposed development.

COMMENT: The bulk and scale of any future motel building will be in keeping with that of the existing club development.

2.12 Development in coastal zone generally—development not to increase risk of coastal hazards

Development consent must not be granted to development on land within the coastal zone unless the consent authority is satisfied that the proposed development is not likely to cause increased risk of coastal hazards on that land or other land.

COMMENT: No coastal hazard risks involved.

2.13 Development in coastal zone generally—coastal management programs to be considered

Development consent must not be granted to development on land within the coastal zone unless the consent authority has taken into consideration the relevant provisions of any certified coastal management program that applies to the land.

COMMENT: No management program applies to the land, though Council is in the process of preparing a CMP that covers the open coast and river. The hazard maps prepared as part of this process indicate that Iluka Road near Woody Head is mapped as subject to coastal inundation. Council has advised that the draft CMP is likely to be made public in mid-2024 for exhibition. This is a 'whole of Iluka' issue that Council will need to address and the addition of the motel will have no impact on the issue or Council's response.

rob donges planning consultant

12 Nautilus Place

yamba New South Wales 2464

Attention: Rob Donges

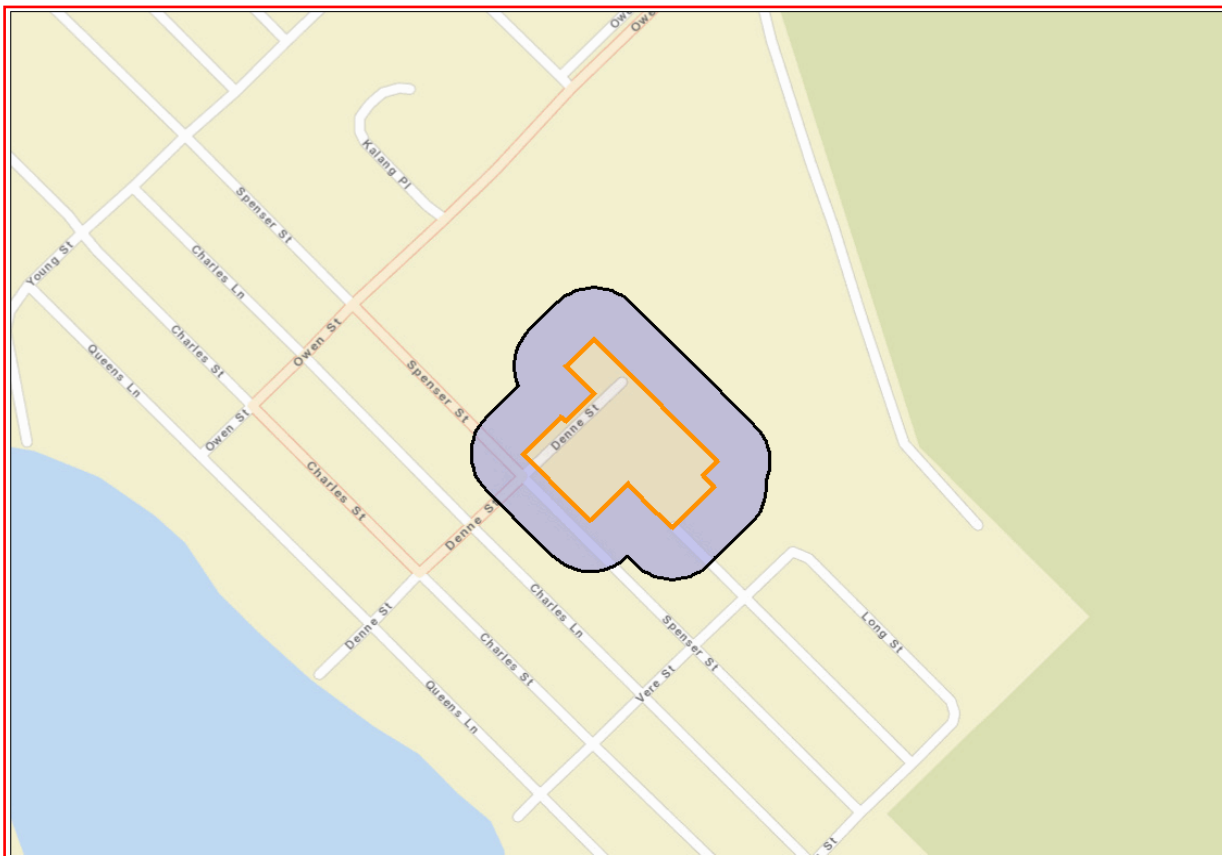
Email: rdongesyamba@icloud.com

Date: 04 August 2023

Dear Sir or Madam:

AHIMS Web Service search for the following area at Lot : 11, DP:DP1269790, Section : - with a Buffer of 50 meters, conducted by Rob Donges on 04 August 2023.

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

| | |
|---|---|
| 0 | Aboriginal sites are recorded in or near the above location. |
| 0 | Aboriginal places have been declared in or near the above location. * |

If your search shows Aboriginal sites or places what should you do?

ANNEXURE I

- You must do an extensive search if AHIMS has shown that there are Aboriginal sites or places recorded in the search area.
- If you are checking AHIMS as a part of your due diligence, refer to the next steps of the Due Diligence Code of practice.
- You can get further information about Aboriginal places by looking at the gazettal notice that declared it. Aboriginal places gazetted after 2001 are available on the [NSW Government Gazette \(https://www.legislation.nsw.gov.au/gazette\)](https://www.legislation.nsw.gov.au/gazette) website. Gazettal notices published prior to 2001 can be obtained from Heritage NSW upon request

Important information about your AHIMS search

- The information derived from the AHIMS search is only to be used for the purpose for which it was requested. It is not be made available to the public.
- AHIMS records information about Aboriginal sites that have been provided to Heritage NSW and Aboriginal places that have been declared by the Minister;
- Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings,
- Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS.
- Aboriginal objects are protected under the National Parks and Wildlife Act 1974 even if they are not recorded as a site on AHIMS.
- This search can form part of your due diligence and remains valid for 12 months.



ANNEXURE J

Iluka Bowls Club Ltd

45 001 060 144

Spencer Street, ILUKA

PO Box 39

Iluka, NSW 2466

Email: admin@ilukabowls.com.au

Phone: (02) 66466188

10th October 2023

As the General Manager of Iluka Bowls Club Ltd (trading as Club Iluka) I would like to make the following statement regarding our proposed Motel development in protecting the future of our Club.

A recent University of NSW study, published on the 29 Nov 2022 by Ben Knight, highlights the following future of Bowling clubs.... *"In total, the number of bowls clubs in Sydney decreased from 210 in 1980 to 128 in 2022. The attrition rate has also increased recently, with 51 club closures in the past decade alone... "Bowling clubs have traditionally been a fixture of the suburban landscape in the big cities, and country towns too. But there has been a notable fall in their numbers over the years. Many that have survived have also significantly changed their operations," says co-author of the study, [Professor Robert Freestone](#).*

Additionally, information supplied by Bowls NSW stated the following, *"approximately 130 clubs have disaffiliated with Bowls NSW since 2008."*

In September 2022 it was announced that the Tasmanian State Government was to introduce *"card-based gaming for electronic gaming machines in Tasmanian hotels, clubs and casinos by December 2024... The default limits will be \$100 per day, \$500 per month and \$5000 per year."* (Matt Maloney, The Examiner, 16th September 2022). Gaming for most Clubs dictates up to 80% of revenue followed by approximately 15% in bar revenue with the remaining 5% in other revenue. (Data supplied by Yamba Bowling Club 2016). This proves true for Iluka Bowls Club.

The above-mentioned legislation and decline in bowling membership has triggered Clubs to look to diversify their revenue streams and become less reliant on gaming in order to survive looming future reform. Whilst NSW is currently under voluntary testing of cashless gaming, it feels inevitable that gaming reform will impact gaming revenue. Clubs are supportive of protecting their members with ClubsNSW introducing the Gaming Code of Conduct which came into effect on 1st July 2023. Additionally new gaming machines now impose a standard \$500 maximum cash limit.

Clubs in the Clarence Valley such as Yamba Bowling Club and Maclean Bowling Club have recently put these mitigative measures in to practice in diversifying into the accommodation/tourism market by purchasing, in Yamba's case two Motels, and in Maclean's case, constructing a Motel on Club owned land. This is not a new concept, with Evan's Head Bowls Club investing in cabins on Club-owned land directly next to the Club many years ago. Cherry Street Sports Club, Ballina, has also now purchased two nearby motels.

The move to invest in accommodation is considered 'related diversification' for Clubs being relevant to the hospitality industry.

Most recent data (2022/2023) supplied by Yamba Bowling Club CEO Phil Boughton, demonstrated a net profit from their Aston Motel of \$296,000 and direct revenue from their motel guests \$77,500. They have now purchased the Twin Pines Motel directly opposite their Club and already direct



ANNEXURE J

Iluka Bowls Club Ltd

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revenue from those motel guests is \$64,000. The Maclean Bowling Club Motel netted approximately \$300,000 profit from their motel last financial year and this does not include direct revenue from Motel guests at their Club.

Maclean Bowling Club made the decision to utilize one of their bowling greens for their Motel project, similarly to our proposal to use under-utilised club-owned land for an alternative revenue stream. Maclean borrowed the entire Motel construction amount and repaid the debt within three years. They have now purchased nearby units, Maclean Stays, and have recently invested profits into upgrading the Clubs facilities at the tune of \$3million without the requirement to borrow funds. Similarly, the Yamba Bowling Club also paid their debt within four-five years for their Aston Motel purchase. The greatest benefit to the Clubs is their net asset worth and the ability to pay their debts should the unthinkable occur as well as being able to sustain the ongoing increasing costs in the general running of the Club.

Our current Club house will be in need of major upgrades in the future, and we believe that the extra income generated from an onsite Motel will be the answer to continue to provide a very important community facility for many years to come.

Nicola Donsworth
General Manager
Iluka Bowls Club Ltd

Annexure K – 2023 NSW Coastal Design Guidelines and Appendix 1 Assessment Checklist

The property is located in the Coastal Environment Area and Coastal Use Area and so is subject to these Guidelines where they are relevant to those management areas. An assessment using Appendix 1 of the Guidelines is below.

The assessment notes that the site is 1.2km from Iluka Beach and 300m from the Clarence River and so is not affected by coastal hazards, though Iluka Road is (see Annexure H, Clause 2.13) nor has any impact on issues such as coastal headlands, coastal views and access etc. It also notes that to its north is the Iluka Koala Reserve and the Iluka Nature Reserve and to the west is the Ken Leeson Oval recreational area, but it will have no impact on these areas as it is located along the southern frontage of the property and is integrated into the existing club development.

Other matters relevant to the Guidelines are

- Stormwater quality and quantity will be managed in accordance with Council's requirements. Details submitted with future DA.
- Future motel height will be in keeping with existing club building and will be integrated.

NSW Coastal Design Guidelines 2023



Appendix 1: Assessment checklist for planning proposals

Hierarchy of coastal management areas:

1. CWLRA = coastal wetlands and littoral rainforests area
2. CVA = coastal vulnerability area
3. CEA = coastal environment area
4. CUA = coastal use area

Note: Requirements relating to coastal hazards must be considered for all coastal hazard and risk areas, regardless of which relevant coastal management area(s) these fall within. 'Coastal hazard and risk areas' mean any mapped coastal vulnerability areas and/or areas affected by (or projected to be affected by) coastal hazards that have been identified in a state environmental planning policy, local environmental plan, development control plan, coastal management program, coastal hazard policy or study adopted by council.

| Outcome A. Protect and enhance coastal environmental values | | | |
|--|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome A.1 Protect coastal ecosystems | | | |
| A.1a Avoid development on undeveloped headlands and significant coastal landforms. | CVA, CEA | Y | Y |
| A.1b Do not increase development or intensify land uses where there is existing development on headlands and significant coastal landforms. | CVA, CEA | Y | Y |
| A.1c Identify, protect and enhance sensitive coastal ecosystems including coastal wetlands, littoral rainforests and other coastal threatened ecological communities that may be affected by development. | CWLRA, CEA | Y | Y |
| A.1d Maintain and protect the presence of beaches, rock platforms, coastal dunes, riparian vegetation and the natural features of foreshores, including along estuaries and coastal lakes. | CWLRA, CVA, CEA | Y | Y |
| A.1e Use environmental buffers and limit the number of access points and pathways to protect coastal ecosystems. In some cases, it may not be appropriate to allow public access to areas with highly sensitive ecosystems or animal populations. | CWLRA, CEA, CUA | N | Not required access points to Reserve managed by NPWS |

Outcome A. Protect and enhance coastal environmental values

| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|--|-------------------------------------|---------------------------------------|--|
| A.1f Consider if the planning proposal is needed or if development zones could be better located to minimise effects on biodiversity. | CWLRA, CEA, CUA | Y | Y - Need to be located on Club property |
| A.1g Avoid development that may disturb, expose or drain areas of Class 1 and Class 2 acid sulfate soils. | CWLRA, CEA, CUA | Y | Y |
| A.1h Consider direct and indirect effects of development, including any necessary infrastructure, on water quality, water quantity and hydrological flows of waterways and groundwater. | CEA, CUA | Y | Y |

Outcome A.2 Protect coastal wetlands and littoral rainforests

| | | | |
|---|----------------------|---|--|
| A.2a Identify coastal wetlands and littoral rainforests, including areas that could be rehabilitated or restored in the future, and do not increase development or intensify land uses in these areas. | CWLRA | N | |
| A.2b Allow for the adaptive management of stormwater run-off so that the quality of water leaving the site is better than pre-development quality to lessen effects on coastal wetlands or other sensitive receiving environments. | CWLRA, CEA, CUA | Y | |
| A.2c Provide environmental buffers and riparian corridors that enable the long-term management and protection of areas of biodiversity and ecosystem integrity. | CWLRA, CVA, CEA, CUA | N | Not required as no impact on biodiversity or ecosystem |
| A.2d Identify and protect areas that allow for landward migration pathways for coastal wetlands to respond to climate change. | CWLRA, CEA | N | Not required, no wetlands in vicinity. |
| A.2e Exclude land uses that affect the natural state of coastal wetlands and littoral rainforests or that will make it harder to rehabilitate these ecosystems in the future. | CWLRA | Y | Y |

Outcome A.3 Protect marine parks and aquatic reserves

| | | | |
|--|----------|---|---|
| A.3a Avoid development and land uses that affect the environmental, economic, social and cultural values of marine parks and aquatic reserves. | CEA, CUA | Y | Y |
| A.3b Protect the ecological health of marine parks and aquatic reserves, including providing for riparian vegetation and buffers in their catchments. | CEA, CUA | Y | Y |

Outcome B. Ensure the built environment is appropriate for the coast and local context

| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|--|-------------------------------------|---------------------------------------|--|
| Outcome B.1 Respond to and protect elements that make the place special | | | |
| B.1a Integrate development within the natural topography of the site and ensure land use, building scale and height respond sympathetically to coastal landforms. | CWLRA, CVA, CEA, CUA | Y | Y |
| B.1b Ensure the intended form and footprint of development does not dominate coastal elements, including foreshores, public spaces and other areas of natural beauty. | CWLRA, CVA, CEA, CUA | Y | Y |
| B.1c Incorporate adaptive, water-sensitive urban design into the development footprint to reduce run-off and manage water quality within receiving environments. | CWLRA, CEA, CUA | Y | Y - Future stormwater plan |
| B.1d Ensure that lot sizes, building heights and density are appropriate for the coastal settlement, and complement the existing or desired local character, supported by place-based strategies. | CEA, CUA | Y | Y |
| B.1e Avoid development that would harm geological features and geoheritage. | CEA, CUA | Y | Y |
| Outcome B.2 Ensure urban development complements coastal scenic values | | | |
| B.2a Limit ribbon development and urban sprawl wherever possible. In certain locations, place-based strategies may support increased development density and building heights as a better response to urban growth. | CEA, CUA | Y | Y |
| B.2b Use greenbelts to create, maintain and mark out separation between settlements. | CEA, CUA | Y | Not required |
| B.2c Consider effects on scenic values and maintain publicly accessible views to significant landmarks. | CEA, CUA | Y | Y |
| B.2d Ensure that building heights consider the effect on views from different vantage points. | CEA, CUA | Y | Y |
| B.2e Retain or create views from public spaces. Prioritise this over creating views from private property. | CEA, CUA | Y | Y |
| B.2f Provide for active transport links along foreshores, including along estuaries and coastal lakes, and between settlements to increase public access and amenity. | CWLRA, CVA, CEA, CUA | Y | Y - Links exist |

Outcome C. Protect and enhance the social and cultural values of the coastal zone

| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|---|-------------------------------------|---------------------------------------|--|
| Outcome C.1 Protect and promote heritage values | | | |
| C.1a Ensure development does not harm heritage values or sites. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.1b Work collaboratively with local Aboriginal people before and throughout the planning proposal process. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.1c With permission and guidance from local Traditional Custodians, identify and emphasise significant features of coastal land and sea Country. | CWLRA, CVA, CEA, CUA | Y | Y- Proposal forwarded to Yaegl Traditional Owners Corp. |
| C.1d With permission and guidance from local Traditional Custodians, identify and protect sacred and significant areas through the appropriate siting of development. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.1e Ensure land use, building type, scale and height respond to heritage items and areas. | CEA, CUA | Y | Y |
| Outcome C.2 Provide public access to significant coastal assets | | | |
| C.2a Protect and, where practical, improve, public amenity, access to and use of beaches, foreshores, rock platforms, geoheritage sites and headlands, unless you must restrict access for public safety or for environmental or cultural protection. In doing so, consider both current and projected future coastal hazards. | CVA, CEA | Y | Y |
| C.2b Identify opportunities to maintain and improve existing public access to beaches, foreshores, coastal waters and coastal lakes that support active and passive recreation activities, where this does not interfere with existing coastal industries. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.2c Consolidate access points and consider alternative access to protect sacred and significant Aboriginal cultural areas. | CWLRA, CVA, CEA, CUA | Y | Y - Access points managed by NPWS |
| C.2d Maintain and improve foreshore access and connections to existing or proposed networks of public open spaces. This includes waterways, riparian areas, bushland and parks for active and passive recreation. | CWLRA, CVA, CEA, CUA | Y | Y Access points managed by NPWS |
| C.2e Consider opportunities to protect and improve habitat connectivity through settlements, such as those described in the <i>Greener Places Design Guide</i> . | CWLRA, CEA, CUA | Y | Y |

Outcome C. Protect and enhance the social and cultural values of the coastal zone

| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|--|-------------------------------------|---------------------------------------|--|
| C.2f Avoid development on coastal dunes and foreshore reserves unless it is for essential public purposes, such as surf life-saving club buildings. Any building or structure located on dunes must be of lightweight construction and relocatable. | CVA, CEA | Y | Y |
| C.2g Define the boundaries of development sites with a public edge – for example, a pedestrian pathway or public laneway. | CEA, CUA | Y | Y - not required |
| C.2h Prevent the privatisation of coastal open space by ensuring development next to foreshores is set back, maintains public access and accessibility, and provides links and connections to other public accessways. | CEA, CUA | Y | Y |
| Outcome C.3 Protect public amenity | | | |
| C.3a Avoid development that will overshadow the beach, foreshore or public domain. Apply the standard that there must be no overshadowing before 4 pm (midwinter) and 7 pm (Eastern Daylight Saving Time). | CEA, CUA | Y | Y |
| C.3b Protect the amenity of public spaces from buildings, structures or land uses that may be visually and/or acoustically intrusive or create wind funnels. | CEA, CUA | Y | Y |

| Outcome D. Support sustainable coastal economies | | | |
|---|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome D.1 Support sustainable industries and recreational activities that depend on the coast | | | |
| D.1a Ensure that development will not harm sustainable coastal industries needing waterfront access, or recreational use of the coastal environment. | CEA, CUA | Y | Y |
| D.1b Protect and improve essential facilities such as access ramps and jetties for sustainable coastal industries needing waterfront access. | CEA, CUA | Y | Y |
| D.1c Ensure access ramps, jetties, pontoons, groynes and other structures do not impede navigation on the water or harm coastal landforms or impair processes such as surf breaks. | CWLRA, CVA, CEA, CUA | Y | Y |
| D.1d Ensure that the proposal considers how development in a waterway may affect the land. | CEA, CUA | Y | Y |
| Outcome D.2 Promote green infrastructure | | | |
| D.2a Do not allow development that is likely to significantly reduce connectivity of existing green infrastructure. | CEA, CUA | Y | Y |
| D.2b Provide for diverse green infrastructure that can support the changing needs of current and future communities, and provide tourism and recreational opportunities. | CEA, CUA | Y | Y |

| Outcome E. Respond to coastal hazards | | | |
|--|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome E.1 Respond to coastal processes | | | |
| E.1a Planning proposals that affect land within a coastal hazard and risk area must not alter coastal processes in a way that harms the natural environment or other land. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.1b Exclude development in areas affected by a current or projected future coastal hazard that is likely to increase the risk of coastal hazards on that land or other land. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.1c Locate or consolidate development in areas with little or no exposure to current and projected future coastal hazards, to ensure public safety and prevent risks to life. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.1d Do not increase development potential or intensify land uses in a coastal hazard or risk area. | CWLRA, CVA, CEA, CUA | Y | Y |
| Outcome E.2 Account for natural hazard risks | | | |
| E.2a Identify areas on and near the proposal that are affected by current or projected future coastal hazards. Ensure that the proposal is compatible with any identified threat or risk. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.2b Account for potential interaction between coastal hazards and other current and future natural hazards. This includes flooding, bushfires, landslip, heatwaves, severe storms, east coast lows and cyclones. Refer to the <i>Strategic Guide to Planning for Natural Hazards</i> . | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments in report |
| E.2c Manage natural hazard risk within the development site. Avoid using public space or adjoining land to lessen risk. | CWLRA, CVA, CEA, CUA | Y | Y |
| Outcome E.3 Account for climate change | | | |
| E.3a Demonstrate that the proposal applies a 100-year planning horizon for the full range of climate change projections for coastal hazards. This approach recognises that sea level is projected to continue to rise for centuries because of climate change. | CWLRA, CVA, CEA, CUA | Y | Y- See flood comments |
| E.3b Consider how climate change could affect the risk profile of existing natural hazards and create new vulnerabilities and exposure for the proposal in the future. | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments |

NSW Coastal Design Guidelines 2023



Appendix 1: Assessment checklist for planning proposals

Hierarchy of coastal management areas:

1. CWLRA = coastal wetlands and littoral rainforests area
2. CVA = coastal vulnerability area
3. CEA = coastal environment area
4. CUA = coastal use area

Note: Requirements relating to coastal hazards must be considered for all coastal hazard and risk areas, regardless of which relevant coastal management area(s) these fall within. 'Coastal hazard and risk areas' mean any mapped coastal vulnerability areas and/or areas affected by (or projected to be affected by) coastal hazards that have been identified in a state environmental planning policy, local environmental plan, development control plan, coastal management program, coastal hazard policy or study adopted by council.

| Outcome A. Protect and enhance coastal environmental values | | | |
|--|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome A.1 Protect coastal ecosystems | | | |
| A.1a Avoid development on undeveloped headlands and significant coastal landforms. | CVA, CEA | Y | Y |
| A.1b Do not increase development or intensify land uses where there is existing development on headlands and significant coastal landforms. | CVA, CEA | | Y |
| A.1c Identify, protect and enhance sensitive coastal ecosystems including coastal wetlands, littoral rainforests and other coastal threatened ecological communities that may be affected by development. | CWLRA, CEA | | Y |
| A.1d Maintain and protect the presence of beaches, rock platforms, coastal dunes, riparian vegetation and the natural features of foreshores, including along estuaries and coastal lakes. | CWLRA, CVA, CEA | | Y |
| A.1e Use environmental buffers and limit the number of access points and pathways to protect coastal ecosystems. In some cases, it may not be appropriate to allow public access to areas with highly sensitive ecosystems or animal populations. | CWLRA, CEA, CUA | N | Not required access points to Reserve managed by NPWS |

Outcome A. Protect and enhance coastal environmental values

| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|--|-------------------------------------|---------------------------------------|--|
| A.1f Consider if the planning proposal is needed or if development zones could be better located to minimise effects on biodiversity. | CWLRA, CEA, CUA | | Y - Need to be located on Club property |
| A.1g Avoid development that may disturb, expose or drain areas of Class 1 and Class 2 acid sulfate soils. | CWLRA, CEA, CUA | Y | |
| A.1h Consider direct and indirect effects of development, including any necessary infrastructure, on water quality, water quantity and hydrological flows of waterways and groundwater. | CEA, CUA | Y | |

Outcome A.2 Protect coastal wetlands and littoral rainforests

| | | | |
|---|----------------------|---|--|
| A.2a Identify coastal wetlands and littoral rainforests, including areas that could be rehabilitated or restored in the future, and do not increase development or intensify land uses in these areas. | CWLRA | N | |
| A.2b Allow for the adaptive management of stormwater run-off so that the quality of water leaving the site is better than pre-development quality to lessen effects on coastal wetlands or other sensitive receiving environments. | CWLRA, CEA, CUA | Y | |
| A.2c Provide environmental buffers and riparian corridors that enable the long-term management and protection of areas of biodiversity and ecosystem integrity. | CWLRA, CVA, CEA, CUA | N | Not required as no impact on biodiversity or ecosystem |
| A.2d Identify and protect areas that allow for landward migration pathways for coastal wetlands to respond to climate change. | CWLRA, CEA | N | Not required, no wetlands in vicinity. |
| A.2e Exclude land uses that affect the natural state of coastal wetlands and littoral rainforests or that will make it harder to rehabilitate these ecosystems in the future. | CWLRA | Y | Y |

Outcome A.3 Protect marine parks and aquatic reserves

| | | | |
|--|----------|---|---|
| A.3a Avoid development and land uses that affect the environmental, economic, social and cultural values of marine parks and aquatic reserves. | CEA, CUA | Y | Y |
| A.3b Protect the ecological health of marine parks and aquatic reserves, including providing for riparian vegetation and buffers in their catchments. | CEA, CUA | Y | Y |

Outcome B. Ensure the built environment is appropriate for the coast and local context

| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|--|-------------------------------------|---------------------------------------|--|
| Outcome B.1 Respond to and protect elements that make the place special | | | |
| B.1a Integrate development within the natural topography of the site and ensure land use, building scale and height respond sympathetically to coastal landforms. | CWLRA, CVA, CEA, CUA | Y | Y |
| B.1b Ensure the intended form and footprint of development does not dominate coastal elements, including foreshores, public spaces and other areas of natural beauty. | CWLRA, CVA, CEA, CUA | Y | Y |
| B.1c Incorporate adaptive, water-sensitive urban design into the development footprint to reduce run-off and manage water quality within receiving environments. | CWLRA, CEA, CUA | Y | Y - Future stormwater plan |
| B.1d Ensure that lot sizes, building heights and density are appropriate for the coastal settlement, and complement the existing or desired local character, supported by place-based strategies. | CEA, CUA | Y | Y |
| B.1e Avoid development that would harm geological features and geoheritage. | CEA, CUA | Y | Y |
| Outcome B.2 Ensure urban development complements coastal scenic values | | | |
| B.2a Limit ribbon development and urban sprawl wherever possible. In certain locations, place-based strategies may support increased development density and building heights as a better response to urban growth. | CEA, CUA | Y | Y |
| B.2b Use greenbelts to create, maintain and mark out separation between settlements. | CEA, CUA | Y | Not required |
| B.2c Consider effects on scenic values and maintain publicly accessible views to significant landmarks. | CEA, CUA | Y | Y |
| B.2d Ensure that building heights consider the effect on views from different vantage points. | CEA, CUA | Y | Y |
| B.2e Retain or create views from public spaces. Prioritise this over creating views from private property. | CEA, CUA | Y | Y |
| B.2f Provide for active transport links along foreshores, including along estuaries and coastal lakes, and between settlements to increase public access and amenity. | CWLRA, CVA, CEA, CUA | Y | Y - Links exist |

Outcome C. Protect and enhance the social and cultural values of the coastal zone

| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|---|-------------------------------------|---------------------------------------|--|
| Outcome C.1 Protect and promote heritage values | | | |
| C.1a Ensure development does not harm heritage values or sites. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.1b Work collaboratively with local Aboriginal people before and throughout the planning proposal process. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.1c With permission and guidance from local Traditional Custodians, identify and emphasise significant features of coastal land and sea Country. | CWLRA, CVA, CEA, CUA | Y | Y- Proposal forwarded to Yaegl Traditional Owners Corp. |
| C.1d With permission and guidance from local Traditional Custodians, identify and protect sacred and significant areas through the appropriate siting of development. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.1e Ensure land use, building type, scale and height respond to heritage items and areas. | CEA, CUA | Y | Y |
| Outcome C.2 Provide public access to significant coastal assets | | | |
| C.2a Protect and, where practical, improve, public amenity, access to and use of beaches, foreshores, rock platforms, geoheritage sites and headlands, unless you must restrict access for public safety or for environmental or cultural protection. In doing so, consider both current and projected future coastal hazards. | CVA, CEA | Y | Y |
| C.2b Identify opportunities to maintain and improve existing public access to beaches, foreshores, coastal waters and coastal lakes that support active and passive recreation activities, where this does not interfere with existing coastal industries. | CWLRA, CVA, CEA, CUA | Y | Y |
| C.2c Consolidate access points and consider alternative access to protect sacred and significant Aboriginal cultural areas. | CWLRA, CVA, CEA, CUA | Y | Y - Access points managed by NPWS |
| C.2d Maintain and improve foreshore access and connections to existing or proposed networks of public open spaces. This includes waterways, riparian areas, bushland and parks for active and passive recreation. | CWLRA, CVA, CEA, CUA | Y | Y Access points managed by NPWS |
| C.2e Consider opportunities to protect and improve habitat connectivity through settlements, such as those described in the <i>Greener Places Design Guide</i> . | CWLRA, CEA, CUA | Y | Y |

Outcome C. Protect and enhance the social and cultural values of the coastal zone

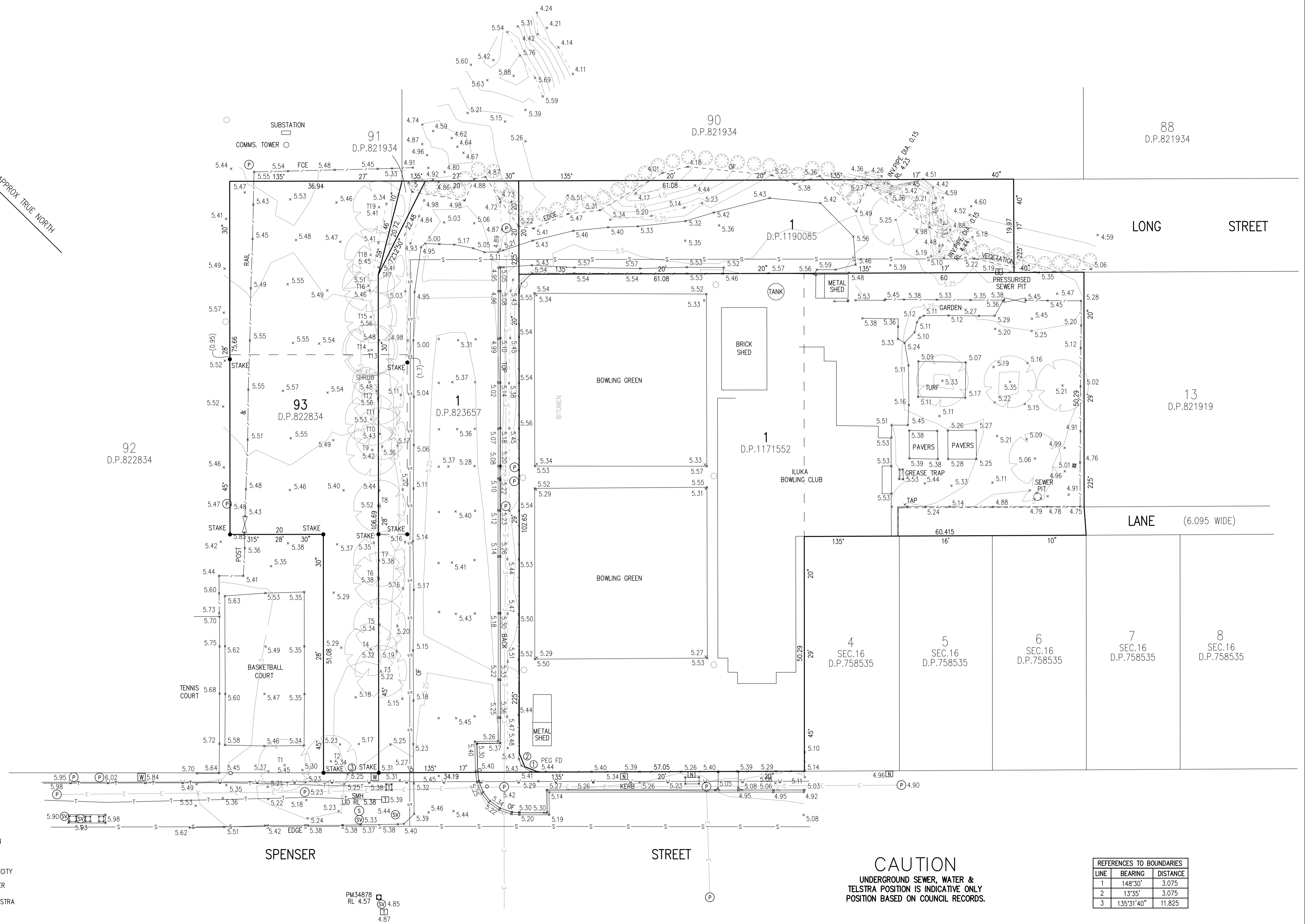
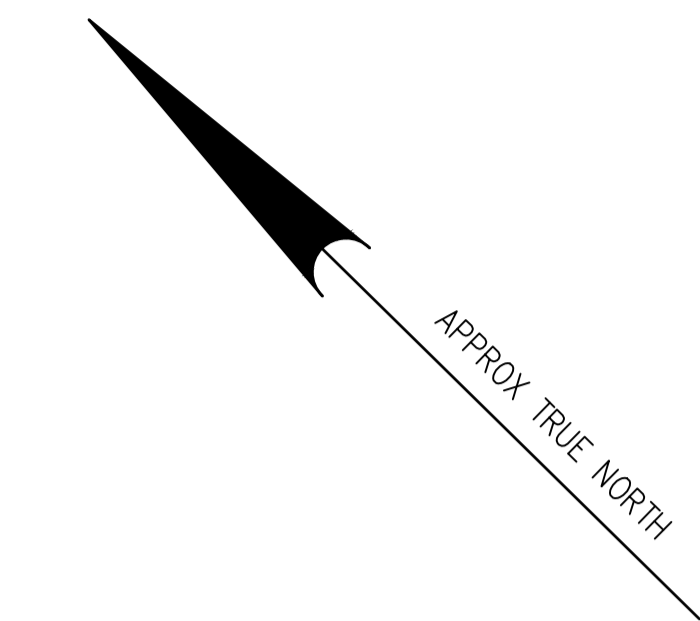
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
|--|-------------------------------------|---------------------------------------|--|
| C.2f Avoid development on coastal dunes and foreshore reserves unless it is for essential public purposes, such as surf life-saving club buildings. Any building or structure located on dunes must be of lightweight construction and relocatable. | CVA, CEA | Y | Y |
| C.2g Define the boundaries of development sites with a public edge – for example, a pedestrian pathway or public laneway. | CEA, CUA | Y | Y - not required |
| C.2h Prevent the privatisation of coastal open space by ensuring development next to foreshores is set back, maintains public access and accessibility, and provides links and connections to other public accessways. | CEA, CUA | Y | Y |
| Outcome C.3 Protect public amenity | | | |
| C.3a Avoid development that will overshadow the beach, foreshore or public domain. Apply the standard that there must be no overshadowing before 4 pm (midwinter) and 7 pm (Eastern Daylight Saving Time). | CEA, CUA | Y | Y |
| C.3b Protect the amenity of public spaces from buildings, structures or land uses that may be visually and/or acoustically intrusive or create wind funnels. | CEA, CUA | Y | Y |

| Outcome D. Support sustainable coastal economies | | | |
|---|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome D.1 Support sustainable industries and recreational activities that depend on the coast | | | |
| D.1a Ensure that development will not harm sustainable coastal industries needing waterfront access, or recreational use of the coastal environment. | CEA, CUA | Y | Y |
| D.1b Protect and improve essential facilities such as access ramps and jetties for sustainable coastal industries needing waterfront access. | CEA, CUA | Y | Y |
| D.1c Ensure access ramps, jetties, pontoons, groynes and other structures do not impede navigation on the water or harm coastal landforms or impair processes such as surf breaks. | CWLRA, CVA, CEA, CUA | Y | Y |
| D.1d Ensure that the proposal considers how development in a waterway may affect the land. | CEA, CUA | Y | Y |
| Outcome D.2 Promote green infrastructure | | | |
| D.2a Do not allow development that is likely to significantly reduce connectivity of existing green infrastructure. | CEA, CUA | Y | Y |
| D.2b Provide for diverse green infrastructure that can support the changing needs of current and future communities, and provide tourism and recreational opportunities. | CEA, CUA | Y | Y |

| Outcome E. Respond to coastal hazards | | | |
|--|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome E.1 Respond to coastal processes | | | |
| E.1a Planning proposals that affect land within a coastal hazard and risk area must not alter coastal processes in a way that harms the natural environment or other land. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.1b Exclude development in areas affected by a current or projected future coastal hazard that is likely to increase the risk of coastal hazards on that land or other land. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.1c Locate or consolidate development in areas with little or no exposure to current and projected future coastal hazards, to ensure public safety and prevent risks to life. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.1d Do not increase development potential or intensify land uses in a coastal hazard or risk area. | CWLRA, CVA, CEA, CUA | Y | Y |
| Outcome E.2 Account for natural hazard risks | | | |
| E.2a Identify areas on and near the proposal that are affected by current or projected future coastal hazards. Ensure that the proposal is compatible with any identified threat or risk. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.2b Account for potential interaction between coastal hazards and other current and future natural hazards. This includes flooding, bushfires, landslip, heatwaves, severe storms, east coast lows and cyclones. Refer to the <i>Strategic Guide to Planning for Natural Hazards</i> . | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments in report |
| E.2c Manage natural hazard risk within the development site. Avoid using public space or adjoining land to lessen risk. | CWLRA, CVA, CEA, CUA | Y | Y |
| Outcome E.3 Account for climate change | | | |
| E.3a Demonstrate that the proposal applies a 100-year planning horizon for the full range of climate change projections for coastal hazards. This approach recognises that sea level is projected to continue to rise for centuries because of climate change. | CWLRA, CVA, CEA, CUA | Y | Y- See flood comments |
| E.3b Consider how climate change could affect the risk profile of existing natural hazards and create new vulnerabilities and exposure for the proposal in the future. | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments |

| Outcome E. Respond to coastal hazards | | | |
|---|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome E.4 Provide sustainable defences to coastal hazards | | | |
| E.4a Reduce exposure to coastal hazards by protecting, restoring or improving natural defences. This includes coastal dunes, vegetation, coastal floodplains and coastal wetlands, where suitable. | CWLRA, CVA, CEA, CUA | Y | Y - not relevant |
| E.4b If natural defences are not possible, reduce exposure to coastal hazards without significantly degrading: <ul style="list-style-type: none"> • biological diversity and ecosystem integrity • ecological, biophysical, geological and geomorphological coastal processes • beach and foreshore amenity, or the social and cultural value of these areas • public safety and access to, or use of, beaches or headlands. | CWLRA, CVA, CEA, CUA | Y | Y - not relevant |
| Outcome E.5 Protect essential infrastructure | | | |
| E.5a Locate and design essential infrastructure to reduce vulnerability to current and projected future coastal hazards. Consider the effects of climate change over at least a 100-year planning horizon. | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments |
| E.5b Where exposure to coastal hazards cannot be avoided, prepare adaptation plans for essential service infrastructure. These plans should be consistent with any applicable coastal management program. | CWLRA, CVA, CEA, CUA | Y | Y -not relevant |
| E.5c Consult local Aboriginal land management experts and emergency management agencies on how to strategically locate access routes and other essential infrastructure. | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments |
| Outcome E.6 Change land uses to manage legacy issues and avoid creating new ones | | | |
| E.6a Ensure the proposal will not require coastal management interventions to remain viable over its expected lifespan. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.6b Consider the potential legacy effects of the proposal and if the proposed land uses or development will create a social, environmental, economic or cultural burden for future generations. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.6c Consider if the proposed change of land use could remove redundant legacy infrastructure or reduce existing legacy effects. | CWLRA, CVA, CEA, CUA | Y | Y |

| Outcome E. Respond to coastal hazards | | | |
|---|-------------------------------------|---------------------------------------|--|
| Requirement | Relevant coastal management area(s) | Applicable to planning proposal (Y/N) | Planning proposal is consistent with guidelines (Y/N) If 'No', justify this |
| Outcome E.4 Provide sustainable defences to coastal hazards | | | |
| E.4a Reduce exposure to coastal hazards by protecting, restoring or improving natural defences. This includes coastal dunes, vegetation, coastal floodplains and coastal wetlands, where suitable. | CWLRA, CVA, CEA, CUA | Y | Y - not relevant |
| E.4b If natural defences are not possible, reduce exposure to coastal hazards without significantly degrading: <ul style="list-style-type: none"> • biological diversity and ecosystem integrity • ecological, biophysical, geological and geomorphological coastal processes • beach and foreshore amenity, or the social and cultural value of these areas • public safety and access to, or use of, beaches or headlands. | CWLRA, CVA, CEA, CUA | Y | Y - not relevant |
| Outcome E.5 Protect essential infrastructure | | | |
| E.5a Locate and design essential infrastructure to reduce vulnerability to current and projected future coastal hazards. Consider the effects of climate change over at least a 100-year planning horizon. | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments |
| E.5b Where exposure to coastal hazards cannot be avoided, prepare adaptation plans for essential service infrastructure. These plans should be consistent with any applicable coastal management program. | CWLRA, CVA, CEA, CUA | Y | Y -not relevant |
| E.5c Consult local Aboriginal land management experts and emergency management agencies on how to strategically locate access routes and other essential infrastructure. | CWLRA, CVA, CEA, CUA | Y | Y - See flood comments |
| Outcome E.6 Change land uses to manage legacy issues and avoid creating new ones | | | |
| E.6a Ensure the proposal will not require coastal management interventions to remain viable over its expected lifespan. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.6b Consider the potential legacy effects of the proposal and if the proposed land uses or development will create a social, environmental, economic or cultural burden for future generations. | CWLRA, CVA, CEA, CUA | Y | Y |
| E.6c Consider if the proposed change of land use could remove redundant legacy infrastructure or reduce existing legacy effects. | CWLRA, CVA, CEA, CUA | Y | Y |



| REFERENCES TO BOUNDARIES | | |
|--------------------------|------------|----------|
| LINE | BEARING | DISTANCE |
| 1 | 148°30' | 3.075 |
| 2 | 13°35' | 3.075 |
| 3 | 135°31'40" | 11.825 |

7. ILUKA SECTOR

| | | | |
|--|---|-----------------------------------|---|
| 7.1. ILUKA SECTOR See Map Attached | | | |
| Sector Description | This sector covers, Iluka, Mororo, The Freshwater, Woody Head, Goodwood, Harwood, Chatsworth, Warregah Island and Woombah. | | |
| Hazard | Clarence River riverine flooding | | |
| Flood Affect Classification | Iluka and Woombah become a high flood islands following the flooding of access roads at 2.1 m on the Maclean gauge. | | |
| At risk properties in a PMF AEP | Iluka – 392 Harwood – 170 Chatsworth Island – 51 Chatsworth - 82 3 Caravan Parks and a Campground | Total number of properties | Iluka – 1314 Harwood – 158 Chatsworth Island 79 (2021 Census) |
| Population | Iluka – 1764 Harwood – 346 Chatsworth Island - 157 | | |
| Sector Control | The Incident Controller will nominate a Sector Commander to control evacuations in this Sector. The NSW SES will conduct evacuations in this sector with assistance from NSW Police, Fire and Rescue NSW, and NSW Rural Fire Service (RFS) volunteers. | | |
| Key Warning Gauge Name: Maclean (204410/558022) | Minor: 1.60 m | Moderate: 2.20 m | Major: 2.50 m |
| Gauge Name: Yamba (204454) | Minor: 1.60 m | Moderate: 2.20 m | Major: 2.50 m |
| General Strategy | <ul style="list-style-type: none"> • Evacuation of at-risk population. • Self-evacuation to friends/family outside of the impact area. • Establishment of an Assembly Area/Evacuation Centre at the Iluka Community Hall 54 Spencer Street, Iluka, or Club Iluka 75-79 Spencer Street, Iluka where evacuees are able to gather while flood situation is monitored. | | |
| Key Risks / Consequences | <ul style="list-style-type: none"> • Potential loss of life from rapid and potentially high velocity inundation. • Potential isolation of hundreds of people estimated to be for a number of days. | | |
| Information and Warnings | <ul style="list-style-type: none"> • Flood Watch • Flood Warning • AWS Advice • AWS Watch & Act • AWS Emergency Warning • Sequenced door knocking of evacuation sub sectors • Media announcements (including social media) • Emergency Alert (SMS, Landlines) • Standard Emergency Warning Signal (SEWS) | | |

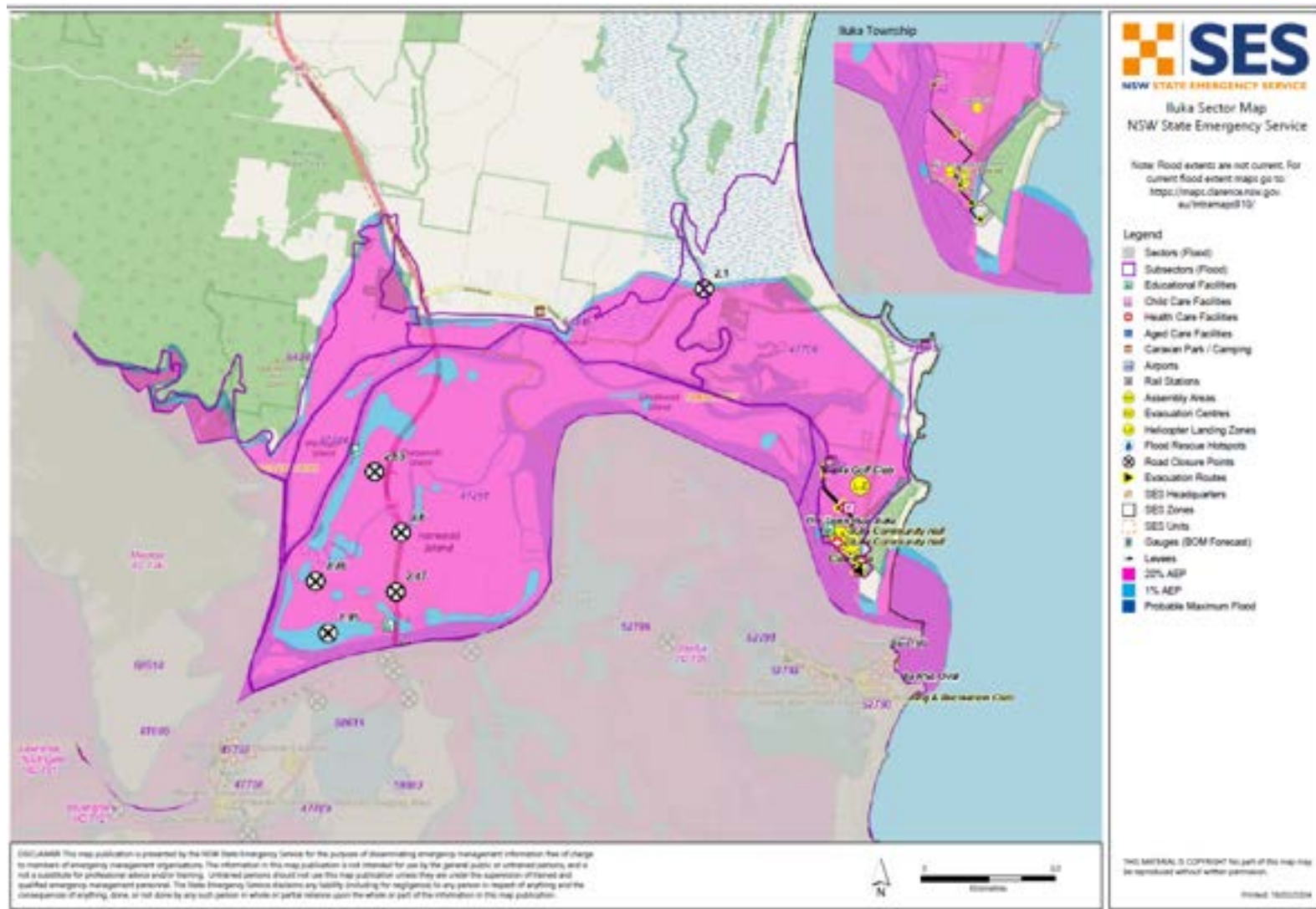
| | |
|----------------------------|--|
| Property Protection | Specific property protection measures: <ul style="list-style-type: none"> • Monitoring rising flood waters. • Relocation of livestock where resources are available. • Relocation of farm machinery and valuable goods where resources are available. • Control of surface water through sandbagging measures. • Assist in the lifting of furniture to residents in need where resources are available. • Monitoring integrity of dwellings surrounded by flood waters. |
| | Protection of essential infrastructure: <ul style="list-style-type: none"> • No identified essential infrastructure requiring protection. • The Sewerage Treatment Plant is located in Johnsons Lane, Iluka. This area is subject to flooding during a PMF event. • Clarence Valley Council Water and Sewerage Flood Plan address procedures for sewerage treatment plant. |

| | |
|---------------------------------|---|
| Evacuation Triggers | <p>The effects on the towns and outlying areas in this sector are very much dependent on tidal influences. Tidal levels will need to be identified at the onset of main Clarence River flooding.</p> <p>Maclean gauge (204410/558022):</p> <ol style="list-style-type: none"> 1. Prediction to reach and/or exceed 2.0 m Local Warnings will commence, including notification to: <ul style="list-style-type: none"> • The Anchorage Holiday Park Iluka • Browns Rocks Caravan Park Goodwood Island 2. Prediction to reach and/or exceed 2.1 m (isolation) The Iluka Road at the Esk River may be cut, causing isolation of the town. Based on monitoring and assessment known locations of flooding are: Marandowie Drive, Melville Street, Sovereign Street and Conrad Close. 3. Prediction to reach and/or exceed 2.4 m Targeted Emergency Warning of a number of houses around Iluka may be considered. 4. Prediction of between 2.5m to 2.7m (Isolation) Targeted Emergency Warning for residents in Harwood. The village of Harwood is totally flooded, most houses in this area are raised preventing over floor flooding. 6. Prediction to reach and/or exceed 3.0 m Extensive flooding of Chatsworth, Harwood and Warregah Islands. Evacuations of low-lying houses may be necessary. 7. Prediction to reach and/or exceed 3.5 m Water starts to flow around Harwood Sugar Mill. 7. Prediction to reach and/or exceed 3.6 m (isolation) The village of Woombah may become isolated; however, land is above the PMF. |
| Sequencing of evacuation | <p>A number of residences and properties may need to be evacuated during periods of significant flooding. In most floods, the evacuation tasks will only involve a small number of people. These properties would be dealt with on a case by case situation in conjunction with Department of Communities and Justice.</p> |
| Evacuation Routes | <ul style="list-style-type: none"> • The local Evacuation Routes will be chosen in consideration of current road conditions. These routes will direct residents to the local Assembly Area/evacuation centres in the town. <p>See Attached Map</p> |

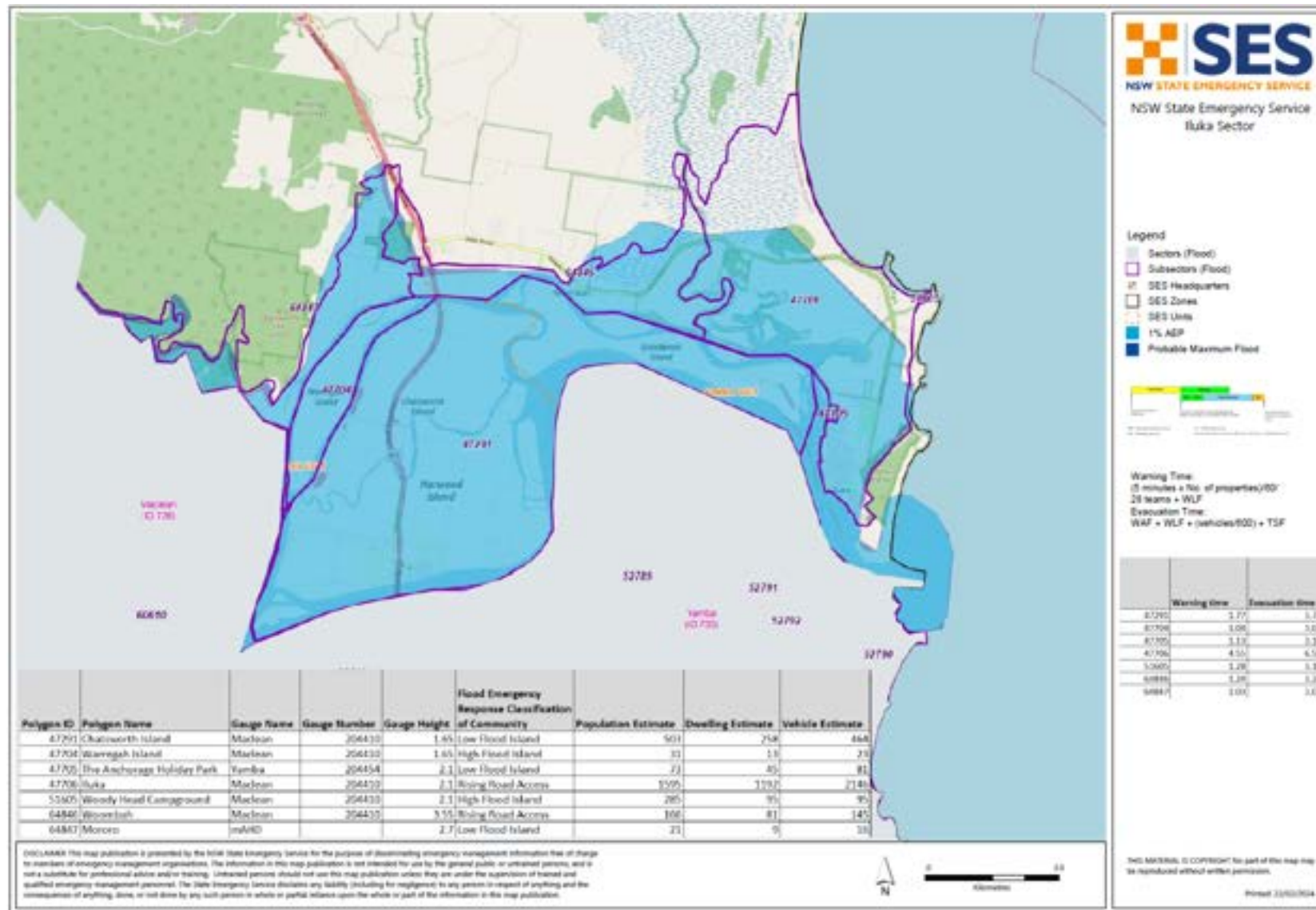
| | |
|---|---|
| Evacuation Route Closures | <p>Road closures which may affect the isolation of the town of Iluka:</p> <ul style="list-style-type: none"> • The closure of local roads will be dependent on local rainfall and tidal conditions. • The only route in and out of Iluka is the Iluka Road which can be cut at the Esk River (2.1 m Maclean gauge 204410/558022). • Yamba Road closes (2.1 m Maclean gauge 204410/558022) at the "Cloverleaf" (Southern approach to Harwood Bridge 5 km north of Maclean). • Big River Way closed at Ferry Park, Maclean (2.5 m Maclean gauge 204410/558022). <p>Road closures which may affect evacuation of the Chatsworth and Harwood Island areas:</p> <ul style="list-style-type: none"> • Watts Lane closes (2.28m Maclean gauge 204410/558022) • Chatsworth Road Closes near the south bound off ramp at Serpentine Channel (2.65m Maclean gauge 204410/558022) • Localised road closures on Chatsworth Road northbound onto the Pacific Highway may also impact evacuation in these areas. <p>Other known road closures:</p> <ul style="list-style-type: none"> • Big River Way Closes (5.4m Grafton (Prince Street) gauge (204400/58178)) at Alipou Creek, Alternate route high level bypass Centenary Drive. • Pacific Highway, Southbound to Grafton remains open up to 2.6m on the Maclean Gauge (204410/558022). Closure at Serpentine Channel. • Pacific Highway Northbound from Iluka road remains open. |
| Method of Evacuation | <ul style="list-style-type: none"> • Primarily self-evacuation by private transport before road closures. • At risk residents will be door knocked by NSW SES, RFS and other emergency personnel and advised on the evacuation details. |
| Evacuation Centre/Assembly Point | <ul style="list-style-type: none"> • Iluka Community Hall 54 Spencer Street, Iluka; and • Club Iluka 75-79 Spencer Street, Iluka. Both of these Evacuation Centres are within the PMF extent. During a PMF event Thompson Street remains accessible and above flood level. Suggest resourcing this area with marquees, water and basic essentials. |
| Large scale evacuations | <ul style="list-style-type: none"> • If large scale evacuations are likely, additional sites will be identified as an Assembly Area/evacuation centres to accommodate residents of Iluka, Woody Head and any outlying areas. |

| | |
|----------------------------|---|
| Rescue | <ul style="list-style-type: none"> The flood rescue management process adopted will be determined by the Incident Controller, based on the scale of the flood rescue operations. The Incident Controller may declare a flood rescue area of operations and establish a flood cell to assist with the management of flood rescues. All Flood Rescue Operations will be undertaken as per the State Rescue Policy |
| Resupply | <ul style="list-style-type: none"> Resupply will be provided by the NSW SES through the 132500 call out system. |
| Aircraft Management | <p>Helicopter Landing Zones:</p> <ul style="list-style-type: none"> Iluka Golf Course (S29° 23' 73.2" E153° 21'39.0") – Flooded in a PMF The Town Oval (S29° 24' 38.9" E153° 21'24.2") - Flooded from 1% AEP |
| Other | <p>Special considerations relating to evacuation:</p> <ul style="list-style-type: none"> Closure of schools - coordinated through the Department of Education and Training. The evacuation of domestic animals, horses and livestock to the appropriate facility to be managed by Department of Primary Industries and Local Land Services. Closure of licensed premises. All hotels and licensed clubs will be closed if required. Security. Police patrols to be established to maintain law and order after evacuation has occurred. The NSW SES will use flood boats, aircraft, community contacts and other agencies to monitor the safety of individuals, where feasible. These arrangements will stay in place until the "Return with Caution" is provided by the NSW SES to residents to return to their premises. <p>Iluka has four peak seasons with a potential population increase of more than 10%:</p> <ul style="list-style-type: none"> School holidays tourist influx late December/January School holidays tourist influx April School holidays tourist influx July School holidays tourist influx September/ October |

7.2. ILUKA SECTOR MAP



7.3 EVACUATION PLANNING



ANNEXURE N

CLUB ILUKA MOTEL FLOOD EVACUATION PLAN

1. Introduction

Iluka village is partially floodprone, but Iluka Road is cut when a level of 2.1m is predicted for the Maclean gauge. Once Iluka Road is cut, the village is isolated potentially for up to 7 days.

In extreme flood events, the village is almost entirely inundated, including the Motel site.

2. Evacuation Plan Principle

The principle underpinning this Plan is that the Motel will be fully evacuated before Iluka Road is cut. This will allow guests to evacuate to Maclean or north and south on the Pacific Motorway depending on flood conditions elsewhere on the north coast.

3. Evacuation Plan Process

- If a Flood Watch is instigated for the Clarence River, Motel management will monitor alerts and keep guests advised.
- If Flood Warnings are issued predicting that a level of at least 2.1m will be reached on the Maclean gauge, management will contact all guests either by door knocking or on their mobile phones and instruct that they evacuate the Motel. At this point there would be a minimum of 12-24 hours notice so evacuation would not need to occur at nighttime if that is when the initial prediction is issued or if the level is predicted to be reached at night time.
- Management will contact all guests with future bookings in the next week advising that the motel is closing due to possible flooding of the Clarence River and will take no new bookings for that week. This duration can be lengthened or shortened depending on the nature of the actual flood if it occurs.
- Management will disconnect power and water to the Motel to ensure there can be no occupation after the initial evacuation.
- The Motel will not be reopened until the SES and Council have advised that Iluka Road is fully operational.

4. Evacuation Route

The Maclean evacuation centre is at Maclean Showgrounds, 12 Cameron Street, Maclean.