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General Manager
Richmond Valley Council
Locked Bag 10
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22 February 2012

Dear Sir

Re Peer Review Development Application No. 2011.223
RSL Lifecare Evans Head Retirement Village
Lot 141 DP 1067639, Memorial Airport Drive, Evans Head, NSW

1 Introduction

I have been requested by Richmond Valley Council's (RVC) Manager Planning and Development to undertake a peer review of Council's processing and reporting of Development Application (DA) No. 2011.223. The reason for the peer review is that RVC owns the land the subject of the DA and has entered into agreement to sell the land to the proponents of the development (RSL Lifecare).

I am a qualified Town Planner with 8 years' experience as a community development officer / town planner, development assessment town planner and strategic town planner in Local Government and 17 years' experience as a consultant Town Planner.

The tasks for the peer review were:

1. review of DA documentation
2. review of exhibition process
3. review of DA file & submissions & to identify key issues in submissions
4. review of DA additional documentation
5. review of concurrence & integrated (GTA) advices
6. consider and determine whether key issues raised in submissions have addressed in DA documentation & additional documentation
7. undertake a site inspection
8. discuss the DA with Council's Development Assessment Officer
9. review the Council's Development Assessment Report to the Joint Regional Planning Panel and
10. prepare a letter report of my review.

I have undertaken the above tasks as part of the preparation of this letter report and the following reports my findings.

2 The Development Application (DA)

DA No. 2011.223 is for:

1. A Torrens Titled subdivision comprising;
 - 24 residential allotments with areas 600-720m² and of a range of 13 house designs to be erected on the allotments and

- 1 x 8.0ha allotment on which the integrated retirement village is to be constructed.
- 2. An integrated retirement village comprising;
 - a residential aged care facility containing 121 x single rooms
 - 41 x 1 room serviced apartments each with ensuite
 - 145 x 2 bedroom (+ study) independent living units
 - a men's and maintenance shed
 - a child-care centre (40 children) and
 - an entry structure and signage to main entrance to Currajong St.
- 3. Ancillary facilities including;
 - a community building (with licensed café/bistro)
 - an in-ground swimming pool
 - a bowling green
 - a mini golf course
 - a croquet lawn & facilities
 - an outdoor chess board and
 - a vegetable garden.
- 4. Provision of infrastructure and landscaping.

The development is to be constructed in 13 stages.

The DA is an 'integrated development' pursuant to s. 91 of the *Environmental Planning and Assessment Act 1979* as the 'general terms of approval' are required pursuant to:

- s. 58 of the *Heritage Act 1977* from the Heritage Council of NSW and
- s. 100B of the *Rural Fires Act 1997* from the NSW Rural Fire Service.

The development plans were prepared by Humel Architects, Dee Why and Statement of Environmental Effects (SEE) prepared by Ardill Payne & Partners, Ballina.

The key events and actions in regard the lodgement, exhibition, processing, assessment and reporting of the DA are as follows.

3 DA lodgement

The Applicant is; Humel Architects, PO Box 1666, Dee Why, NSW.

The DA is on land known as Lot 141 DP 1067639, Memorial Airport Drive, Evans Head. The land has an area of 9ha and forms part of the Evans Head Memorial Aerodrome which is identified as an item of State heritage significance (No. 01649).

The land is owned by Richmond Valley Council (RVC).

The General Manager (Mr B Wilkinson) on behalf of RVC signed the DA form consenting to the lodgement of the DA.

The DA was lodged on 7 February 2011 and RVC issued its acknowledgement letter to the Applicant on 9 February 2011.

4 DA exhibition

RVC, in writing, notified 72 owners of land, both adjoining and in the immediate locality of the subject land of the DA on 9 February 2011.

The DA was publically notified by RVC in its 'news column' in the Northern Star newspaper on 12 February 2011.

Advisory signage was erected on the land.

The RVC letter to adjoining and other landowners, 'news column' in the Northern Star and advisory site signage advised that:

- the DA was on public exhibition from on 12 February 2011 to 18 March 2011
- the DA Statement of Environmental Effects (SEE) was on display at the administration offices of RVC at Evans Head and Casino and
- any person could make a submission in regard the DA.

At the close of the period of public exhibition RVC had received 25 submissions and 2 petitions in regard the DA. Section 5.5 in summary identifies the key issues raised in the submissions.

On 8 February 2011 RVC referred the DA to the Joint Regional Planning Panel and the following State agencies (as existed then) and potential stakeholders:

- NSW Heritage Office
- Department of Environment, Climate Change and Water (now Office of Environment & Water)
- NSW Police
- NSW Rural Fire Service
- NSW Roads and Traffic Authority (RTA)
- NSW National Parks and Wildlife Service (NPWS)
- Department of Primary Industries - Fisheries (now Industry & Investment – Fisheries)
- Junbung Elder Aboriginal Corporation and
- Casino Boolangle Local Aboriginal Land Council.

On 21 February 2011 the DA was also referred by RVC to:

- NSW Fire Brigade and
- NSW Ambulance Service.

In accordance with cl. 61 of the *Environmental Planning and Assessment Regulation 2000* copies of the 25 public submissions and 2 petitions were issued to:

- The Joint Regional Planning Panel
- NSW Heritage Office
- Department of Environment, Climate Change and Water (now Office of Environment & Water)
- NSW Police
- NSW Rural Fire Service
- NSW Roads and Traffic Authority (RTA)
- NSW National Parks and Wildlife Service (NPWS)
- Department of Primary Industries - Fisheries (now Industry & Investment – Fisheries)
- Junbung Elder Aboriginal Corporation and
- Casino Boolangle Local Aboriginal Land Council.

Section 5.3 in summary identifies the responses of State agencies and potential stakeholders.

The DA was referred to the following advisory committees of RVC for comment:

- Richmond Valley Transport Advisory Committee
- 55+ Advisory Committee and

- Women's Advisory Committee.

Section 5.2 in summary identifies the responses of the advisory committees.

5 DA assessment

5.1 Internal council referral and assessment

The DA was referred to the following departments / sections of RVC:

- Development engineering
 - Environmental health
 - Building services and
 - Town Planning
- for specialist assessment.

Summary of responses from departments / sections of RVC

Development engineering raised no objection to the DA and recommended imposition of conditions of development consent relating to the subdivision and development and the provision of the roads, footpaths, water, sewerage, stormwater, telecommunications and electrical infrastructure and services, minimum floor levels, payment of service and community facility developer contributions and construction certificate approvals.

Environmental health initially raised concerns in regard; noise impact, laundry facilities, loading & unloading areas and waste management and requested that further information be sought from the Applicant in regard those concerns. Additional information was sought from the Applicant (refer Section 5.4) and provided in regard these issues. Environmental health recommended imposition of conditions of development consent relating to; noise, food premises, ventilation, rainwater tanks, the swimming pool, external lighting, amenity, stormwater discharge, storage of hazardous substances and waste management.

Building services raised no objection to the DA and recommended imposition of conditions of development consent relating to the Building Code of Australia and construction certificate approvals.

Town Planning initially raised concerns in regard the proposed 24 Torrens Titled allotments 'detached / severed' from the aged care facility and consistency in creating those with the aerodrome Plan of Management and provisions of RVC's Development Control plan (DCP) No. 10, consistency with the 'light industrial' use of part of the land nominated in Figure 1 and with development standards for building setbacks, site coverage, car parking & landscaping) within DCP No. 10, provision of a childcare facility in an aged care facility (relationship to aged care, location in relation to town & industrial area & potential for its change of use), provision and use of the proposed community centre & men's shed and relationship to the aged care facility, consistency with *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (Seniors-SEPP) potential impact on existing facilities and services in Evans Head (demographic change, medical and community facilities, upgrade and connection with existing footpaths, bus access for future residents to town and regional services), prominent site on entry to town and potential for visual impact and landscaping, control of signage, heritage (to be considered by Heritage Office), restriction on use (occupation of aged care facility, dwellings on the 24 allotments, use of community facilities) and car parking (consultation required with RTA pursuant to *State Environmental Planning Policy (Infrastructure) 2007* (I-SEPP), parking for

childcare centre & community building, Airport Dr car parking & connection with footpaths in area).

Additional information was sought from the Applicant (refer Section 5.4) and provided in regard the above issues. The town planning report to the JRPP recommends the imposition of conditions of development consent relating to; the subdivision of the land, occupancy with the integrated retirement village, the standard of construction of the independent living units, provision of a bus, use (placements) within the child care centre, hours of operation of the child care centre, use and hours of operation of the men's shed, use of the community building, acoustic measures to be provided in buildings, erection of dwellings on the 24 Torrens Titled allotments, landscaping and on-site car parking.

5.2 Referral to council committees

The Richmond Valley Transport Advisory Committee at its meeting 23 February 2011 advised RVC of the following matters / concerns / issues:

- That the DA move the crossing back to 3 vehicle lengths, or further, if possible from the roundabout at Currajong St
- That the small bus service also be offered on a regular bus route that matches existing bus times from the connecting bus services
- That any bus shelter also allow space for secure gopher parking
- That the village commit to also providing health/ medical related transport to specialist appointments in-house as existing community transport organisations are unable to take additional results for support on this front and
- Some committee members also made the recommendation the village consider a roundabout for access to and from the village. Not all members of the committee supported this suggestion.

The 55+ Advisory Committee at its meeting 21 February 2011 requested consideration of the following issues:

- The limited number of parking spaces for services such as plumbers, electricians, health outreach staff
- Need for more visitor parking even if in front of the driveways and
- Support and need for the aged care facility in Evans Head.

The Women's Advisory Committee at its meeting 14 March 2011 requested consideration of the following issues:

- The need for a Social Impact Assessment of the proposal and consultation and outline of the impact of the proposal on Health and Ageing, Disability and Home Care as well as others
- Clarification if there was any dementia specific services in the complex and recommendations of the same
- Recommendation that day are facilities and rehabilitation services be offered within the community centre
- Comment that there is need for some partnered care in the high care unit so that elderly couples do not need to split up and
- Confirmation that there is a need to have a scooter way from the facility to Evans Head, more consideration of parking for visitors and servicing organisations and good connections to existing transport services.

RVC also referred the DA to its heritage advisor, Mr Kenneth W. Young. Mr Young in letter dated 24 February 2011 to RVC advised support of the DA as proposed.

5.3 External referrals and assessment

The following in summary identifies the responses made by State agencies and potential stakeholders to the DA.

Office of Water

The Office of Water issued a 'stop the clock' letter on 22 February 2011 to RVC which requested further information in regard the depth of the proposed swimming pool and groundwater, the proposed stormwater management system, groundwater de-watering and potential for stormwater interacting and impacting on groundwater.

Ardill Payne was advised by RVC of the issues of the Office of Water and on behalf of the Applicant in letter dated 21 March 2011 provided additional information to RVC and the Office of Water which included; confirmation of levels of the swimming pool, design and construction of the stormwater management basin, modelling of stormwater infiltration and a groundwater de-watering management plan.

The Office of Water in letter dated 6 April 2011 noted that the modelling for the constructed stormwater system involves the discharge of approximately 46% of the collected stormwater through the basin floor and raised concern that this will be 'short cutting' the polishing process prior to discharge to an external water body (i.e. the water table) and that if the desired water quality at the final discharge point cannot be reached through a closed wetland system then an alternative system should be developed.

The Office of Water in letter on 11 April 2011 requested that its letter of 6 April 2011 be disregarded, reiterated its comments made in the letter 6 April 2011 and advised that no groundwater licence was required for the system proposed and that RVC seek advice from the Fisheries Ecosystems Branch of the Dept. of Primary Industries and EPA in regard parameters for the quality of stormwater discharge.

RVC by letter dated 11 April 2011 consulted with Fisheries Ecosystems Branch of the Dept. of Primary Industries and the Environmental Protection Regulation Group in the Office of Environment & Heritage (see below).

Industry & Investment – Fisheries

Industry & Investment – Fisheries in letter dated 10 May 2011 to RVC advised concurrence with the recommendations of the Office of Water and that provision should be made to ensure stormwater discharged from the development not have the potential to impact on the Pygmy Perch (threatened species) by providing; adequate measures for sediment control, water sensitive urban design, on-site storage & detention, water tanks for dwelling, pollutant traps and permeable pavers. The department made recommendations as to parameters for the quality of discharged stormwater that would not impact on Pygmy Perch.

Office of Environment & Heritage

The Office of Environment & Heritage in letter 10 May 2011 advised that; RVC satisfy itself that provisions of the *Protection of the Environment Operations Act 1997* were achieved, that there was no impact on significant fauna and flora, that the DA sufficiently addressed *Threatened Species Conservation Act 1995*, SEPP No. 44 – Koala Protection, SEPP No. 71 – Coastal Protection and the *Native Vegetation Act 2003*, that the DA adequately assessed potential for impact on Aboriginal cultural heritage, that the remediation of the site be validated by an accredited site auditor as suitable for the intended purpose and that the recommendations of the Office of Water in regard groundwater be satisfied.

RTA

The RTA in letter dated 3 March 2011 to RVC sought additional information including; plans showing traffic circulation and the proposed subdivision and more detailed in regard traffic volumes. The information (SEE) was provided by RVC to the RTA on 15 March 2011.

The RTA in letter dated 11 April 2011 to RVC advised it had no objection to the DA provided there was no direct access by vehicles or pedestrians to MR 153 (Evans Head / Woodburn Rd).

NSW Rural Fire Service

The NSW Rural Fire Service in letter dated 29 March 2011 to RVC provided its bushfire safety requirements ('general terms of approval') which comprised; compliance with s. 4.2.7 of Planning for Bushfire Protection 2006 (PBP 2006), provision and maintenance of an inner protection of in accordance with s. 4.1.3 and Appendix 5 of PBP 2006, provision of water & sewer services in accordance with ss. 4.1.3 & 4.2.7 of PBP 2006, provision of internal access roads in accordance with the bushfire threat assessment and s. 4.2.7 and Table 4.1 of PBP 2006 and standards for level of construction of Building 'V', the dwellings on proposed allotments #1, #2, #3, #4 & #5, the provision of a radiant heat shield for proposed allotment #1 and making adequate provision for ember protection.

NSW Police

The NSW Police in letter dated 28 March 2011 to RVC provided comments which included; the assessment in the DA SEE was generalist without consideration of the key principles of crime prevention through environmental design (CPTED), that the development has a high risk rating because of the density and residential age group, consideration should be given to provision of security fencing, landscaping should be designed not to provide concealment areas, support use of CCTV, security gates and doors should be self-locking and accessed with key or magnet swipe or similar, ground floor doors and windows be able to be secured, a regular vegetation maintenance programme implemented to check growth, no support gates or access from Currajong St lots into complex proper, perimeter fence and childcare centre fence should be a security fence with self-locking gates, dead end roads should have sufficient turning areas, pathways should be well lit and have a high level of casual surveillance and be sufficient for shared use by pedestrians, cyclists and scooters, clothes drying areas and garbage collection stations should not be screened off and should have natural and casual surveillance and provision be made to separate pedestrian and vehicular traffic.

Ardill Payne was subsequently requested by RVC on 29 June 2011 (see section 5.4) to provide a CPTED assessment of the proposed development to address the issues raised by NSW Police and to comply with its Policy 2.1.17 Crime Prevention through Environmental Design.

Ardill Payne provided a CPTED assessment (August 2011) and it was referred by RVC on 17 August 2011 to NSW Police for further comment. NSW Police advised RVC in letter dated 14 September 2011 that it believed the key principles of crime prevention through environmental design had been sufficiently addressed in the CPTED assessment prepared by Ardill Payne.

Heritage Council

The Heritage Council in letter dated 10 March 2011 to the Applicant (copy to RVC) sought draft copy of the agreements / covenants to be prepared to ensure that the

proposed development does not adversely impact on the continued use of the aerodrome. The agreements / covenants cited were the; fly-neighbourly agreement, negative covenants proposed for the new lots, noise disclosure statement and noise management plans together with legal advice regarding the adequacy and enforceability of the agreements / covenants. The Office also sought clarification in regard the separate ownership of the proposed 24 Torrens titled allotments and the overall management by RSL Lifecare of noise and amenity issues.

At its meeting on 7 December 2011, the Heritage Council Approvals Committee considered the DA and resolved to advise the Joint Regional Planning Panel of concerns relating to; the change to the retirement village concept endorsed by the Heritage Council in 2005, the heritage agreement for the site only benefits the site whilst RVC is the owner and that RVC is in discussions with another party for the remainder of the site for a residential airpark, the scale and density of the development at the site and that the nature of the proposal is different from the original concept in that it is no longer a retirement village only but also consists of the separate Torrens title allotments.

The Heritage Council in letter dated 19 December 2011 to RVC issued its terms of approval as 'deferred commencement' pursuant to s. 63 of the *Heritage Act 1977*.

5.4 Council additional information requests

RVC sought additional information from the Applicant on 2 & 24 March and 29 June 2011.

The additional information sought in the 2 March 2011 request related to the following issues:

- connection between the 24 Torrens Title residential allotments and the retirement village
- advice as to how heritage controls will be enforced on the 24 Torrens title residential allotments
- copy of legal advice in regard to the proposed negative covenant as a means to control noise complaints from the aerodrome operations
- advice on the mechanism to ensure the house designs and colours will be enforced on the owners of the Torrens title allotments
- the location of rain water tanks servicing the proposed independent living units in accordance with the BASIX commitments
- provision of further justification in regard non compliance with the controls of DCP10 and development outside the retirement village i.e. Torrens title subdivision
- details of the proposed fencing through-out the development
- a social impact assessment on the Evans Head village with particular attention to impact of this development on existing medical and community services in Evans Head
- provision of an example of the standard exemptions that would be sought from the Heritage Office
- provision of further justification that the proposed child care centre satisfies the Seniors SEPP and evidence of other similar developments
- provision of evidence the staffing numbers proposed in the development meet Commonwealth and State legislative requirements for aged care
- advice how deliveries will be made to the development particularly to the high care building, given no formal loading dock is proposed
- advice of the extent of food preparation and laundry areas proposed in the development as these appear under-sized

- advice on the likely use of the mini bus service to the development and whether the service will be available to visit larger centres in the region
- provision of an assessment of noise impact in accordance with the Industrial Noise Policy in relation to noise from the industrial area potentially impacting on the development
- provision of an assessment / consideration of noise from the retirement village facilities that may potentially affect the proposed dwellings in the 24 Torrens titled allotments
- detail on waste management including; solid waste stream, location for storage and collection
- advice that RVC had allowed 344 EP's from the development of the land in planning for augmentation of the Evans Head sewerage treatment plant, that the sewer loads from the proposed development (as calculated by Ardill Payne) are nearly 3 times which should be modelled to determine whether or not there maybe a necessity for additional up-grade works
- no water conservation performance targets or details have been provided in the Stormwater Management Concept Plan and a request for a water efficiency plan to be included in the stormwater management plan
- provision of the MUSIC and DRAINS modelling used in the Stormwater Management Concept Plan and
- provision of a flow capacity check to confirm that the existing water reticulation system can supply the development's water requirements.

The letter request for additional information also sought a response to the comments of the Richmond Valley Transport Advisory Committee and the 55+ Advisory Committee (refer to Section 5.2) and provided copy of the request for additional information from the Department of Environment, Climate Change and Water.

The additional information sought in the 24 March 2011 request related to the following issues / matters:

- advice of the proposed operating hours for the residents building and bistro, swimming pool and other external facilities such a miniature golf and croquet, men's shed and child care centre
- comments on the issues raised in the 25 submissions and 2 petitions (refer to section 5.5) and
- information requests and advices made by State agencies

The letter request for additional information also sought a response to the comments of the Women's Advisory Committee (refer to Section 5.2).

The additional information sought in the 29 June 2011 request related to the following issues / matters:

- expressing concern that the measures proposed to ensure specific development controls (e.g. nominated house designs) can be maintained to protect the heritage values of the site
- advising that council is not supportive of the proposed 24 Torrens titled residential subdivision and a view that greater control can be maintained with one owner using either community or strata title subdivision
- expressing concern that Torrens titled subdivision will create significant compliance issues for council with individual owners not complying with development consents and that community or strata title subdivision requires individual owners to seek body corporate approval before seeking consent with council and that council can deal with 1 strata manager (not multiple owners) if compliance issues arise

- expressing concern that the number of places in the proposed child care centre does not correlate with the centre placement to occupant numbers at the Narrabeen facility and that council is of a view that a child care placement number of 20 is more appropriate and will cater for staff, occupants and wider community child care needs
- requesting that the author of the Social Impact Assessment (Real Options Consulting Service) provide comment on the impact of the proposed 40 placement centre on existing child care centres and community based day care services and
- provision of a CPTED assessment of the proposed development to address the issues raised by NSW Police and to comply with its Policy 2.1.17 Crime Prevention through Environmental Design.

Ardill Payne, on behalf of the Applicant, in letter dated 3 June 2011 provided the additional information requested by:

- RVC in letter dated 2 March 2011
- Heritage Council in letter dated 14 March 2011 and
- RVC in letter dated 24 March 2011.

The information provided also included:

- legal advice from Price Water Coopers dated 26 May 2011
- comments from Ainsworth Heritage dated 3 June 2011
- amended plans showing location of water tanks, fencing and garbage collection points from Humel Architects
- a Social Impact Assessment (April 2011) prepared by Real Options Consultancy Service together with comments in regard the proposed child care centre in an undated letter and
- comments from Acoustic Logic dated 2 June 2011.

The letter from Ardill Payne noted the advices of:

- NSW Police in letter dated 28 March 2011
- NSW Rural Fire Service in letter dated 29 March 2011
- Office of Water in letters dated 6 April & 11 April 2011
- Office of Environment & Heritage in letter dated 27 April 2011
- Industry and Investment (Fisheries) in letter dated 10 May 2011 and
- provided a response to the key issues they identified in the submissions and petitions.

5.5 Submissions from the public

A total of 25 submissions and 2 petitions were received by Council in regard the DA.

The majority (13) of the submissions and the 2 petitions related to the proposed child care centre and 2 related to the proposed child care centre and swimming pool..

The key issues raised in the submissions relate to:

- scale of development and potential for impact of proposed development including child care facility on exiting community, medical and ambulance services and businesses within Evans Head
- density of development
- shortage of transport services in Evans Head – worsen situation
- land use conflict between retirement village and airfield
- ANEF contour not accurate – noise not properly assessed
- no site compatibility certification (Seniors SEPP)
- council conflict of interest

- inadequate acoustic assessment, noise from industrial estate and effect of noise on human health (aged & children)
- inadequate legal documentation – noise management
- no buffers between development and airfield
- adequacy of heritage assessment and impact on heritage of the aerodrome – use of former runways, density & scale of development incompatible with former WW2 use
- impact on future use of the aerodrome – safety & noise
- lack of integrated planning – proposed airpark development
- contamination and remediation of the site
- negative social impact on area – increased aged population, separation from community ('us-them')
- impacts on electricity, water, sewerage system and stormwater utilities and services
- no need for additional 24 residential allotments – empty houses in village
- driveways of proposed 24 lots onto Currajong St
- no consultation with the Evans Head Memorial Aerodrome Conservation & Heritage Committee, Dept. of Defence, Mid-Richmond Neighbourhood Centre
- impact of proposed pool on existing aquatic centre - competition
- poor location not close to shops or services
- impact on viability and competition with existing childcare centre – increased fees
- location not suitable for a childcare centre – impact on children from adjoining use & incompatibility with aged care facility
- current Plan of Management for aerodrome site is POM 2005 not POM 2009 which has not been formally approved by Heritage Office
- duplication of existing services – swimming pool & men's shed
- impact on Council infrastructure and
- no / lack of consultation

The letter dated 3 June 2011 from Ardill Payne, on behalf of the Applicant, and RVC's development assessment report have identified and properly considered / addressed the key issues raised in the submissions and petitions.

6 Council assessment of DA

RVC's Development Assessment Panel reviewed the draft conditions of development consent at its meeting on 25 January 2012.

I have reviewed the draft determination assessment reports to the Joint Regional Planning Panel provided to me on 31 January 2012 and 16 February 2012 and provided comments on those reports to RVC's Senior Planning and Development Officer.

7 Conclusion

It is my opinion that:

1. The DA has been properly lodged, exhibited and assessed.
2. The RVC determination assessment report (draft 16 February 2012) to the Joint Regional Planning Panel:
 - describes the proposed development
 - identifies and provides a response to the key issues raised in objections to the DA

- identifies the referral of the DA with various State departments which have an approval role in the assessment and determination of the DA
 - provides an assessment of the DA having regard to the considerations of s. 79(C) of the *Environmental Planning and Assessment Act*.
3. The conditions of development consent recommended in the RVC determination assessment report (draft 16 February 2012) are reasonable and appropriate.
 4. It is open to the Joint Regional Planning Panel to consider and determine the DA.

Should you have any queries in regard the above please do not hesitate to contact me.

Section 147 Reportable Political Donations or Gifts made by Person

I have made no reportable political gifts or donations over the period 23 September 2006 to 22 February 2012 to any Councillor or Council employee of Richmond Valley Council.

Yours faithfully

A handwritten signature in black ink, appearing to read 'M Scott', with a stylized flourish at the end.

Malcolm Scott M.P.I.A.