

DATE OF DETERMINATION	19 August 2025
DATE OF PANEL DECISION	18 August 2025
DATE OF PANEL BRIEFING	11 August 2025
PANEL MEMBERS	Michael Wright (Acting Chair), Bruce Thom, Pamela Dean-Jones, Joe Vescio and Ian Pickles
APOLOGIES	None
DECLARATIONS OF INTEREST	None

Papers circulated electronically on 31 July 2025.

MATTER DETERMINED

PPSNTH-405 – Byron – 10.2023.287.2 – 144 Bayshore Drive, Byron Bay - Review of Determination Development Application (DA) 10.2023.287.1 for Coastal Protection Works, in the form of temporary extension of an existing geobag wall on private property (as described in Schedule 1).

PANEL CONSIDERATION AND DECISION

The Panel considered: the matters listed at item 6, the material listed at item 7 and the material presented at briefings and the matters observed at site inspections listed at item 8 in Schedule 1.

Development application

The Panel determined to approve the development application pursuant to section 4.16 of the *Environmental Planning and Assessment Act 1979*.

The decision was 3:2 in favour of approval. Those against the decision were Bruce Thom and Pamela Dean-Jones.

REASONS FOR THE DECISION

The majority of the Panel determined to approve the application for the reasons outlined in the Council Assessment Report.

In particular, the majority of the Panel was of the view that the amended proposal put forward by the applicant, which was based on the outcome of mediation between the Council and applicant pursuant to the appeal by the proponent in the Land and Environment Court against the previously constituted Panel's decision to not approve the works, dealt with matters raised by that Panel in making its decision.

The majority of the Panel was of the view that the amended proposal achieved this by, amongst other things:

- moving the proposed works two metres landward to ensure no works will be conducted on Crown land
- increasing the proportion of volume of imported nourishment sand located seaward of the proposed works to allow additional sand to enter the coastal system during times of erosion rather than being locked up
- putting in place a maintenance and management plan to adjust the rate of drip feeding of additional sand in response to erosion events over the temporary life of the structure

The majority of the Panel agreed with the Council that under the amended proposal, there were not likely to be impacts on adjacent coastal lands or on beach access.

Bruce Thom and Pamela Dean-Jones disagreed with the majority decision for the reasons set out in Schedule 2.

CONDITIONS

The Development Application was approved subject to the amended conditions in the Council Assessment Report (uploaded on 31 July 2025) with the following amendments:

- Amend Condition A6e to delete '3' and replace with '12' in the second sentence
- Amend Condition B6 to read as follows:

B6 Security Deposits and Bond – Maintenance and Removal

Bond for Maintenance of Geobag Coastal Protection Works

Before the commencement of any works on the site or the issue of a construction certificate, a security deposit (bond) is to be paid to Council as guarantee against damage caused by or to the geobag coastal protection works including damage to any adjoining land.

The proponent will be held responsible for the repair of any damage. The applicant must make all of the following payments to Council and provide written evidence of these payments to the certifier:

Security deposit	\$100,000
Inspection fee	In accordance with the current fees and charges .

The payments will be used for the cost of:

- making good any damage caused by or to the geobag coastal protection works including damage to any adjoining land should the landowner fail to implement the approved Monitoring and Management / Maintenance Plan, and Post Removal Rehabilitation Plan in a timely manner. The post removal rehabilitation works including dune rehabilitation and planting are to be completed within 12 months at the end of the 5-year time limited consent period, and
- any inspection carried out by Council in connection with the completion of the work or the making good any damage.

Note: The amount payable must be in accordance with council's fees and charges at the payment date. The security deposit (bond) will be held by Council for at least 5 years during the time limited consent period and until it is satisfied that this condition is met.

AND

Bond for Removal of Geobag Coastal Protection Works

Prior to the issue of a Construction Certificate, a suitable bond or bank guarantee is to be provided to Council for the removal of the geobag coastal protection works and rehabilitation of the dune in accordance with Conditions A2, F2 and F3.

The bond amount must be 150% of the estimated cost of removal of the works and rehabilitation of the dune and three (3) quotes must be provided for the future removal of these works and all activities associated with dune rehabilitation.

The bond estimate must include all costs, including engineering supervision, appropriate permits, the number of truck movements / loads required, dust mitigation, disposal costs and the rehabilitation of the dune and surrounding area, and any damage to Council's roads and infrastructure.

Upon acceptance of the bond amount, Council will arrange an invoice for the agreed amount.

The bond must be paid prior to the issue of a Construction Certificate.

Reason: To ensure that any required repairs and/or maintenance works are carried out during the lifetime of the consent, and that the geobag coastal protection works will be removed when required and all necessary post removal rehabilitation has occurred within 12 months of the five year time limited consent period ending. Council can use the bond to arrange for removal of the geobag coastal protection works in the event that Condition A2, F2 and F3 are not complied with, in addition to compliance action.

- Insert new Condition B6A to read as follows:

B6A Dilapidation Report

Prior to the issue of a construction certificate (and no earlier than 30 days prior to commencement of works), a pre-construction dilapidation investigation and report is to be submitted to Council and the principal certifying authority and adjoining property owner, detailing the current condition of the site of the approved works and all adjoining land including current vegetation cover on the dune.

Evidence is to be provided in the dilapidation report, indicating the pre development condition of the surrounding public land. Such evidence must include dated photographs.

- Amend Condition C1 to read as follows:

C1 Erosion and Sediment measures

Erosion and sedimentation controls are to be in place in accordance with the [*Guidelines for Erosion & Sediment Control on Building Sites*](#). Particular attention is to be given to the provision of the following sediment and erosion control measures:

- a. Silt fence or sediment barrier;

Sediment and erosion control measures must be maintained at all times until the works has been stabilised by permanent vegetation cover.

Note: Council may impose on-the-spot fines for non-compliance with this condition.

Any such measures that are deemed to be necessary because of the local conditions must be maintained at all times until the site is made stable (i.e. by permanent vegetation cover).

Reason: To ensure that erosion and sedimentation measures are installed and vegetation is planted to ensure dune formation and stability.

- Amend Condition D1 to read as follows:

D1 Construction Hours

The principal certifier must ensure that approved work is only carried out between:

- 7am to 6pm on Monday to Friday.
- 8am to 1pm on Saturday.

The principal certifier must ensure works are not carried out on Sundays and public holidays, except where there is an emergency.

Unless otherwise approved within a construction site management plan, construction vehicles, machinery, goods or materials must not be delivered to the site outside the approved hours of site works.

Note: Any variation to the hours of work requires Council's approval.

Reason: To ensure the amenity of the area is maintained during construction works.

- Amend Condition D2 to remove the word 'building' from the first sentence and the words 'demolition, vegetation removal or' from the second sentence

- Amend Condition E3 to insert 'and Certification' in the condition title and the following as the second sentence:
'A second dilapidation report must be submitted to Council and adjoining property owner, to ascertain if any damage has occurred to the dune on the land or other adjoining land.'
- Amend Condition F3 Post Removal Rehabilitation Plan to insert 'and monitored and maintained for a period of not less than 12 months to the satisfaction of Council' at the end of the condition
- Amend Condition F3 Final Survey to read as follows:

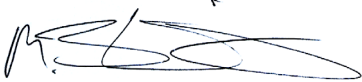




F4 Final Survey / Certification

Upon completion of approved removal works a final survey of the site is to be submitted to Council demonstrating that all removal and rehabilitation works have been undertaken in accordance with the approved removal and rehabilitation plans and that no residual material or structures remain on the land or the adjoining Coastal Reserve. Certification to be provided from the consulting coastal expert to confirm works have been undertaken in accordance with all consent conditions and to the satisfaction of Council.

Reason: To ensure that the works are fully removed, the site is rehabilitated, and no structures are left on the site at the end of the time limited consent period.

CONSIDERATION OF COMMUNITY VIEWS

In coming to its decision, the Panel considered written submissions made during public exhibition. The Panel notes that the submission for the subject application was in support of the application.

PANEL MEMBERS	
 Michael Wright (Acting Chair)	 Joe Vescio
 Bruce Thom	 Ian Pickles
 Pamela Dean-Jones	

SCHEDULE 1		
1	PANEL REF – LGA – DA NO.	PPSNTH-405 – Byron – 10.2023.287.2
2	PROPOSED DEVELOPMENT	Review of determination development Application (DA) 10.2023.287.1 for Coastal Protection Works, in the form of temporary extension of an existing geobag wall on private property
3	STREET ADDRESS	144 Bayshore Drive, Byron Bay
4	APPLICANT/OWNER	Kate Singleton
5	TYPE OF REGIONAL DEVELOPMENT	Certain Coastal Protection Works
6	RELEVANT MANDATORY CONSIDERATIONS	<ul style="list-style-type: none"> • Environmental planning instruments: <ul style="list-style-type: none"> ○ State Environmental Planning Policy (Biodiversity and Conservation) 2021 ○ State Environmental Planning Policy (Planning Systems) 2021 ○ State Environmental Planning Policy (Resilience and Hazards) 2021 ○ Coastal Management Act, 2016 ○ Byron Local Environmental Plan 1988 • Draft environmental planning instruments: Nil • Development control plans: <ul style="list-style-type: none"> ○ Byron Development Control Plan 2010 • Planning agreements: Nil • Relevant provisions of the <i>Environmental Planning and Assessment Regulation 2021</i> • Coastal zone management plan: Nil • The likely impacts of the development, including environmental impacts on the natural and built environment and social and economic impacts in the locality • The suitability of the site for the development • Any submissions made in accordance with the <i>Environmental Planning and Assessment Act 1979</i> or regulations • The public interest, including the principles of ecologically sustainable development
7	MATERIAL CONSIDERED BY THE PANEL	<ul style="list-style-type: none"> • Council Assessment Report: 31 July 2025 • Written submissions during public exhibition: 1 • Total number of unique submissions received by way of objection: 1
8	MEETINGS, BRIEFINGS AND SITE INSPECTIONS BY THE PANEL	<ul style="list-style-type: none"> • Site inspection: 11 August 2025 <ul style="list-style-type: none"> ○ <u>Panel members</u>: Michael Wright (Acting Chair), Pamela Dean-Jones, Bruce Thom, Ian Pickles ○ <u>Council assessment staff</u>: Patrica Docherty ○ <u>Applicant representatives</u>: Jeremy Holmes and Brian Flannery • Applicant Briefing: 11 August 2025 <ul style="list-style-type: none"> ○ <u>Panel members</u>: Michael Wright (Acting Chair), Pamela Dean-Jones, Bruce Thom, Ian Pickles, Joe Vescio ○ <u>Council assessment staff</u>: Patrica Docherty ○ <u>Applicant representatives</u>: Kate Singleton, Greg Britton, Jeremy Holmes and Brian Flannery ○ <u>Department Staff</u>: Carolyn Hunt and Ilona Ter-Stepanova • Final briefing to discuss Council's recommendation: 11 August 2025 <ul style="list-style-type: none"> ○ <u>Panel members</u>: Michael Wright (Acting Chair), Pamela Dean-Jones, Bruce Thom, Ian Pickles, Joe Vescio

		<ul style="list-style-type: none">○ <u>Council assessment staff</u>: Patrica Docherty○ <u>Department Staff</u>: Carolyn Hunt and Ilona Ter-Stepanova
9	COUNCIL RECOMMENDATION	Approval
10	DRAFT CONDITIONS	Attached to the Council Assessment Report

SCHEDULE 2

Reasons for Dissenting Decision in the Determination

Panel Members: Bruce Thom, Pam Dean-Jones

Summary of reasons

This determination is a s8.2 review of a previous decision of the Northern Regional Planning Panel to refuse consent for the proposed coastal protection works on private land near the intermittent entrance to Belongil Creek. The reasons for refusal related to concerns about whether the proposal met s2.12 of the Resilience and Hazards SEPP, and s27 of the Coastal Management Act, and whether the proposed works would compromise the strategic coastal management pathway that is expected to be included in the coastal Management Program(s) for the open coast of Byron Shire and its estuarine creeks.

The amended proposal provides for a better outcome than the previous application. It provides clearer measures to mitigate the potential impacts and risks of the proposed works on land within the coastal zone or other land.

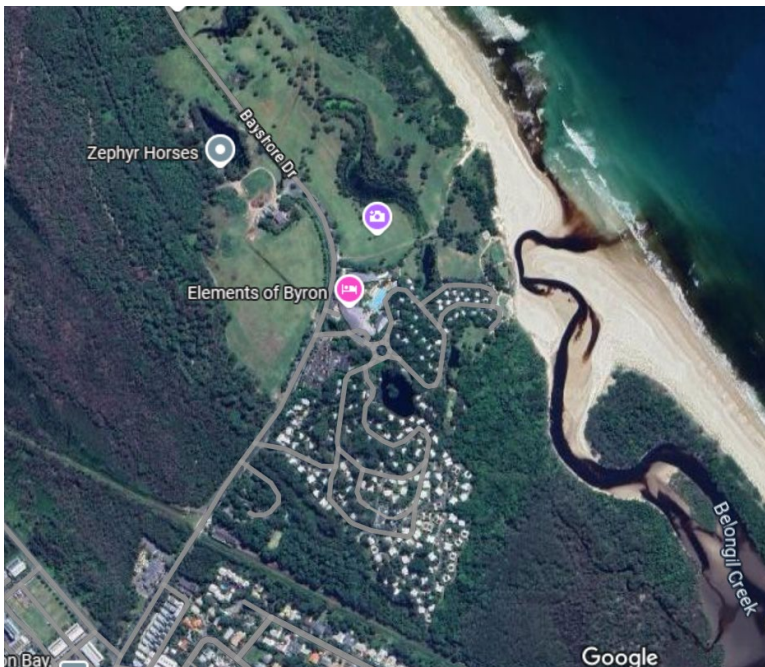
The proposed works are an extension to existing coastal protection works in Belongil Creek. This means that the cumulative impacts of the works on coastal processes, hazards and risks need to be considered. The proposed extension increases the scale of the works in Belongil Creek and brings the works closer to the beach where there is a high likelihood of complex process and hazard interactions. There are no requirements to mitigate increased risk associated with the existing structure (which did not require consent at the time it was constructed) and its contribution to cumulative impacts will continue unmitigated.

In our view, the amended proposal for coastal protection works and the controls proposed in the draft conditions of consent, still leave a level of uncertainty about the extent of interactions between the complex coastal processes and hazards acting at the site and on adjoining land, and the scale of potential increases in risk. This uncertainty means that there is also uncertainty about whether the proposed management and maintenance measures are sufficient for us to be satisfied that increased risks of coastal hazards on adjacent land (other land) will not occur. Over the five-year life of the proposed protection works, the management and maintenance measures are likely to leave residual unmitigated risks which may be significant. We are not confident that the proposed management measures will avoid an increase in the likelihood of hazards on other land or will be sufficient to mitigate the scope of increased hazard interactions and consequences (risks) which could occur over the five-year life of the works.

Evidence and rationale

Geomorphic context

The site inspection conducted on 11 August 2025 confirmed that the coastal processes and hazards operating at this site are complex. The site is located on the western bank of the entrance area of Belongil Creek.



Google image downloaded 13 August 2025

The site and immediately adjoining area are affected by four and likely five coastal hazards:

- coastal lake or watercourse entrance instability
- beach erosion
- shoreline recession. This hazard relates not just to this site but is contiguous with the general recession of the frontal dune to the north leading to loss of Crown land to the sea (as noted in correspondence to Byron Shire Council from the Marine Park Authority) and previous studies and projections of shoreline recession).
- coastal cliff or slope instability. This hazard was not identified in the council assessment report, but it was clear during the site inspection that erosion by other processes and hazards has created an unstable sand cliff, with the potential for collapse. Please see Photo 1.
- erosion and inundation of foreshores caused by tidal waters and the action of waves, including the interaction of those waters with catchment flows. This hazard was not identified in council's assessment report. However, flood flows in Belongil Creek do undercut the banks (in coastal dune landforms). Flood flows interact with tidal flows and storm surge flows. The site of the proposed coastal protection works (and the existing works to which these are an extension) is the outside of a meander bend in the creek, where the migrating channel has undercut the bank.

Slugs of marine sand move in and out of the lower reaches of the creek and affect the plan form of the creek channel, with the potential for highly variable meander channelling leading to sudden changes in the position of the channel. When the entrance is closed, council's entrance management policy requires mechanical opening to be undertaken on the southeastern side of the entrance berm, but the channel frequently occupies other plan form locations.

These processes and hazards interact in complex ways and across different spatial scales and time frames. They all have the potential to affect both the proposed coastal protection structure (i.e. the integrity of the geobags and sand dune cover) and adjacent land.

The stratigraphy of the frontal dune in the immediate vicinity of the proposed works indicates a dynamic geomorphic environment over periods of hundreds to thousands of years. Here the dune face forms an active high erosion cliff, revealing evidence of three separate phases of dune formation and erosion. The most recent of these deposits mantles earlier coastal morphologies. It is a high dune ridge which has no soil profile development, but displaying well-preserved aeolian depositional sedimentary structures (Photo 1). These features suggest relatively recent and dynamic changes to the sedimentary environment. This is

consistent with the known transport of sand along the Byron coast in sand slugs with high supply, separated by periods of sand budget deficit.



Photo1: Site of proposed coastal protection works is the eroded (and grassed) face to the left of the photo. The eroded dune to the right (northwest of the proposed works) has an unstable face approximately 5 metres high, revealing a Pleistocene soil profile at the base of the dune, overlain by cross-bedded sand deposits with no soil profile development. Belongil creek currently flows across the base of this eroded dune face, which continues to slump.

Potential impacts of the proposed works

The complexity of geomorphic processes operating at and immediately adjacent to the proposed site of the works increases the risk of coastal and other geomorphic processes and hazards occurring at rates and scales which are difficult to predict.

The applicant agrees that the proposed coastal protection works has the potential to cause impacts on adjacent land (“end effects”). The existing protection works in Belongil Creek have demonstrably increased the downstream impact of end effect hazards on “other land” namely the site of the proposed extension of the geobag structure. This is the reason that the applicant has proposed the extension to the works, to reduce the impacts of the existing works on their land and assets.

The existing works at Belongil Creek did not have consent conditions requiring ongoing management of impacts on “other land” as defined in s2.12. It is therefore likely that those existing end effects and impacts will continue, and end effects resulting from the proposed works will be cumulative with the existing end effect impacts.

The cumulative impacts of the works will interact with the coastal processes and hazards affecting the site of the protection works and “other land” which is part of a broader recessional trend for the shoreline north of Belongil Creek. It is likely that those impacts will be episodic, with the potential for rapid changes to the landforms, including undercutting of the creek bank, and erosion/retreat and cliffing of dune faces. There is considerable uncertainty as to the extent the proposed works will exacerbate existing erosional trends resulting from the complex interaction of processes and sand mobilisation.

Components of risk to “other land”

The potential impact of the proposed coastal protection works on ‘other land’ (s2.12) are only part of the potential impacts of coastal processes and hazards on that land.

Risk is assessed in terms of likelihood and consequence. The applicant agrees that without mitigation, it is likely that the proposed works will have an impact on coastal hazards affecting ‘other land’.

The challenge here is to determine the consequence of that impact, considering the scale of potential increases to coastal hazards and what assets or values could be affected.

The scale of potential increases of hazards on 'other land', caused by the proposed works, is uncertain, given the variety of potential process and hazard interactions that could occur. However, these potential increases cannot be ignored. It is likely that the most significant increases in hazard will be event driven (not gradual change) and will occur when the site and 'other land' are impacted by coastal storm events and/or high water levels, and/or flood flows, at times when the local sand supply (from slugs of sand moving along the coast) is depleted. 2025 has provided an example of the potential interactions of these conditions.

The consequences of these hazards on the site and on 'other land' include:

- Risks to human safety and human life, from collapse of unstable high sand cliffs, on Crown land, outside the ownership of the applicant (Photos 2 and 3)
- Loss of native coastal vegetation (and collapse of trees onto the beach, with further potential for impacts on safety).
- Public access onto the beach, and into the lower reaches of Belongil Creek.



Photos 2 and 3. Photo 2 shows a large block of sand collapsed from the dune face, and vegetation falling from the eroded crest of the dune. Photo 3 shows a member of the public sitting at the crest of the eroded cross bedded (recent) dune, which is unstable and subject to collapse.

Are the proposed measures to mitigate risk sufficient?

The applicant proposes three primary measures to mitigate the potential impacts and risks of hazards occurring on the site and/or on 'other land':

- Approximately 400m³ of imported sand (from a local sand quarry) will be placed over and seaward of the geobags when they are installed. This is intended to provide a buffer of sand if the coastal protection structure is affected by coastal processes and hazards. The landform created by this sand will be vegetated (grassed – this is the vegetation currently present on the existing structure)
- Over the five-year life of the proposed structure, an additional 450m³ of imported sand (i.e. approximately 112m³ per year) will be placed at the seaward end of the structure, but wholly within land owned by Elements (the owner of the land where the coastal protection structure is to be built). This is described as a 'drip feed' of sand nourishment and is expected to happen at least annually. We have seen no rationale for these nourishment volumes or rates of application.
- Monitoring and maintenance activities, as specified in a Monitoring and Maintenance Plan which is approved by Council. Monitoring of the condition of the structure and the adjoining landforms will be conducted at intervals not exceeding three months, and within two weeks of specified ocean storm or

creek flooding events. On-ground inspections by a coastal engineer may also take place at these times. Reporting will include displacement of geobags, condition of geobags and evidence of erosion above the crest of the works, below the toe of the works and on adjacent land. Reporting will include recommendations for management and/or maintenance activities. The applicant proposes a range of potential management and maintenance activities. These include:

- Repair and replacement of bags
- Grading of erosion scarps to a safe angle where they present an unacceptable risk to public safety. This action is restricted to the private land owned by Elements. It is not proposed that this would occur on the adjacent Crown land, where high and unstable dune scarps currently are present and the proposed works may increase hazard and risk.
- Restoration of any increased erosion caused by the presence of the works using either additional imported sand and/or beach scraping. Both could only occur on the private land or on land controlled by Council.
- Restoration of the public beach access (approximately 160 metres north of the works). We agree that it is unlikely that the proposed works will increase risks to public access at this location.
- Revegetation where vegetation (native vegetation?) has been lost due to the presence of the works.

These are all useful measures to restore a beach and entrance area, and to restore safe public access after an erosion event. We accept that the proposed arrangements, incorporated into conditions of consent, would satisfy s27(1)(b)(ii). We are not convinced that these proposed measures satisfy s27(1)(b)(i).

As noted above, the site and adjacent other land are affected by multiple coastal processes and hazards, which interact at multiple spatial and temporal scales. There is a high level of uncertainty about how the proposed structure will interact with these processes and hazards, especially in large events. It is apparent that the landforms in this location can change rapidly, as the diverse processes and hazards interact with fluctuating sand supply.

It is considered unlikely that a 'drip feed' of sand nourishment (at approximately 112m³ per year) would be sufficient to prevent an increase in coastal hazard risk on the site of the proposed works, but especially on the 'other' (adjacent) land where there is an active unconsolidated sand cliff.

While the applicant proposes to inspect the location regularly and to potentially increase sand nourishment if 'unexpected' erosion occurs, this remedial action would occur after the event, when dunes, vegetation and safety have already been impacted. It cannot be assumed that a drip feed of small volumes of sand will provide sufficient buffer to avoid off site process and hazard impacts which increase risk. The potential for loss of life due to cliff collapse is real now (Photo 3). Over the life of the works the consent authority must be satisfied that the works do not 'pose or likely to pose a threat to public safety' (s 27(1)(a)(i)). We are not satisfied that the applicant will be able to mitigate this risk.

Other matters

Management objectives for the coastal vulnerability area

We note that the site of the proposed coastal protection works is within the coastal use area and coastal environment area. Although it is clearly land affected by coastal hazards (and council and the landowner have a long history of managing diverse hazards to mitigate risks at this location), it is not within the coastal vulnerability area (CVA) because the CVA has not been mapped for the purpose of the Resilience and Hazards SEPP. Nonetheless, we suggest that it is good practice to consider the management objectives for the CVA, as set out in s7(2) and in particular s7(2)(f) and 7(2)(g).

These sections require that for land affected by coastal hazards, the objective is to adopt management strategies that reduce exposure to coastal hazards, in the first instance and wherever possible, by restoring or enhancing natural defences including coastal dunes, vegetation and wetlands. If this is not sufficient,

then by taking other action to reduce exposure to those coastal hazards. S7(2)(g) provides guidance on what is to be protected or avoided when taking other action to reduce exposure to hazards.

S7(2)(g)(ii) is to avoid significant degradation or disruption to ecological, biophysical, geological, and geomorphological coastal processes. S7(2)(g)(iv) is to avoid adverse impacts on adjoining land, resources or assets and S7(2)(g)(v) is to provide for the restoration of a beach or land adjacent to a beach, if increased erosion of the beach or adjacent land is caused by the actions to reduce exposure to coastal hazards.

We do not consider that the applicant has provided information to address s7(2)(f) as to why restoring natural defences would not be sufficient at this location or to demonstrate that the process interactions and impacts (as per s7(2)(g)(ii)) would not be significant. The proposed management and maintenance works will provide a better outcome than previously proposed, but there are uncertainties as to whether the requirements of s7(2)(g)(iv) and s7(2)(g)(v) can be achieved.

Submission from Marine Parks Authority

The submissions from the Department of Primary Industries and the Department of Climate Change, Energy, the Environment and Water (DCCEEW) did not support the original application, because of concerns about increased risk of coastal hazards to 'other land', i.e. unmitigated end effects of the proposed works. The amended proposal is intended to address this concern. There is no correspondence from DCCEEW or the Marine Parks Authority, or Crown lands to demonstrate that they are satisfied that the amended proposal would avoid risks to 'other land' or would reduce risks to 'other land' to negligible.

Interaction with a future Coastal Management Program (CMP)

A reason for the refusal of the original application was that approval could pre-empt the strategic direction for long term coastal management at Belongil Creek, which will be developed through the CMP process. The CMP for the Byron Shire open coast and/or the estuarine creeks such as Belongil Creek is in Stage 3 of preparation. While there is no confirmed timeframe for the completion and certification of the CMP, it is anticipated that the CMP will be certified during the five-year life of the proposed coastal protection works. The application states (and this will be required, as a condition of consent) that the works will be removed after five years and that the site will be remediated to the condition before the installation of the geobags and revegetation with endemic native species. While we have some concerns about the value of restoring the area to its pre protection, eroded condition after five years, we do not consider that the approval of a temporary extension to the existing geobag wall will pre-empt the strategic direction to be developed in the CMP.