

File no: IRF20/4979

# Report to the Northern Regional Planning Panel on an application for a site compatibility certificate under State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

**SITE:** The site compatibility certificate (SCC) (Attachment A1) applies to Lot 1 DP 220319, 47 Darrell Road, Calala (Figure 1). The proposed development is to be located in the south-eastern corner of the allotment (Figure 2).

**APPLICANT:** Perception Planning

**PROPOSAL:** Serviced single-storey self-care housing (Figure 3 and Attachment A2) comprising:

- 20 x self-contained units;
- 30 x 2 bedroom dwellings with 1 car space;
- 19 x 3 bedroom dwellings with 1 2 car spaces;
- café, community centre (with kitchen for on-site provision of meals), shared pool and tennis court; and
- mixed use premises for use as a neighbourhood shop and health services facilities.

### LGA: Tamworth Regional Council



Figure 1 - Location of subject site (source: webmap.environment.nsw.gov.au)



Figure 2 - Location of proposed development within the subject lot (source: SCC application report – Planning Perception)



Figure 3 - Proposed development layout (source: SCC application report - Perception Planning)

### PERMISSIBILITY STATEMENT

The site is zoned RU4 Primary Production Small Lots pursuant to the Tamworth Regional Local Environmental Plan (LEP) 2010.

Seniors housing is not permitted in Zone RU4 Primary Production Small Lots under the Tamworth Regional LEP 2010. Therefore, development for seniors housing purposes on this site requires a SCC pursuant to clause 24 of *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (the SEPP).

Clause 4(1) of the SEPP provides that a SCC can be issued on land zoned for, or adjoining land zoned for urban purposes, but only if specific development types, including dwelling houses are permissible on the land.

The provisions of clause 4(1) of the SEPP provide that an SCC for a residential care facility can be issued for this site because:

- dwelling houses are permissible in Zone RU4 Primary Production Small Lots under the Tamworth Regional LEP 2010;
- the site adjoins land zoned for urban purposes, with the adjoining zone being Zone R2 Low Density Residential (Figure 4); and
- the land to which the SCC applies is not affected by any of the exclusions contained in Schedule 1 Environmentally sensitive land of the SEPP.





Figure 4 - Zoning of Subject lot (source: Tamworth LEP 2010)

### PREVIOUS SITE COMPATIBILITY CERTIFICATE

A Site Compatibility Certificate (SCC) for the site was refused on 17 September 2018 (Attachment C). The SCC related to development of the site for the purpose of serviced self-care housing comprising 20 x independent living units, 30 x twobedroom homes and 19 x three-bedroom homes. The proposed development also included a café, pool, tennis court and medical centre. The same development is now proposed.

The SCC assessment report recommended refusal of the application as the site was considered unsuitable for more intensive development due to unresolved issues with stormwater drainage and water and sewer supplies.

Council advised that they did not support the proposed development at the time for the following reasons:

- <u>New England North West Regional Plan 2036 (NENW RP)</u> The land has not been identified in the NENW RP as a future investigation area for residential development because the site is highly constrained by infrastructure availability and design issues.
- <u>Sewer</u> Council's current sewerage strategy does not provide for a sewer supply to this area. Further, the subject land cannot be serviced by the existing gravity reticulation system and would require a sewerage pumping station to service any future development.
- <u>Water</u> Council's current water strategy does not provide for a water supply to this area from the Calala Pressure Booster system. Investigations would need to be undertaken to determine the capacity of the current system for the additional loading.
- <u>Stormwater</u> The site does not adjoin a natural waterway or suitable stormwater infrastructure. Therefore, the developer would need to secure easements over downstream properties to discharge minor and major stormwater overland flows. In addition, future development of the site would require a detailed stormwater strategy.
- <u>Traffic</u> Calala Lane currently experiences significant volumes of traffic during peak periods. A traffic impact assessment would be required to assess potential impacts on the surrounding road network and to identify if any intersection treatment or road upgrades would be required to accommodate future development.
- <u>Transmission Easements</u> The site is burdened by a transmission easement and consultation with Transgrid and/or Essential Energy would be required if the proposal was to proceed to a development application.

The previous assessment report concluded that although Council's concerns relating to the ability of the site to be adequately serviced were not absolute impediments to development of the land, until those issues were resolved, the site was not suitable for more intensive development.

### PROXMITY OF SITE TO WHICH THERE IS A CURRENT SITE COMPATIBILITY CERTIFICATE, OR AN APPLICATION HAS BEEN MADE BUT NOT YET DETERMINED

There are no other sites within a one kilometre radius of the subject land where there is a current SCC, or an application for a SSC has been made, which is yet to be determined. Therefore, a cumulative impact study pursuant to clause 25(2)(c) of the SEPP is not required.

### CLAUSES 24(2) AND 25(5)

The Panel must not issue a certificate unless it:

- (a) has taken into account any written comments concerning the consistency of the proposed development with the criteria referred to in clause 25(5)(b) received from the General Manager of the council within 21 days after the application for the certificate was made; and
- (b) is of the opinion that:
  - (i) the site of the proposed development is suitable for more intensive development; and
  - (ii) the proposed development for the purposes of seniors housing is compatible with the surrounding environment and surrounding land uses having regard to the criteria specified in clause 25(5)(b).

### CLAUSE 25(2)(C)

As noted previously in the report, a cumulative impact study is not required because there are no other sites within a one kilometre radius of the subject land where there is a current SCC, or an application for a SSC has been made, which is yet to be determined.

### **COUNCIL COMMENTS**

The Panel must not issue a SCC unless it has taken into account any written comments concerning the consistency of the proposed development with the criteria specified in clause 25(5)(b) received from the General Manager of the council within 21 days after the application for the SCC was made (clause 25(5)(a)).

The SCC application was received on 23 October 2020 and the application and supporting information were referred to Tamworth Regional Council on 26 October 2020.

The 21 day period for compulsory consideration of Council comments lapsed on the 24 November 2020. Comments were received from Council on 27 November 2020 and are detailed below (Attachment D). Relevant comments for consideration are also at Attachment A6. Council has indicated their support for the proposal.

Clause	SEPP Requirement	Council Response
(5)(b)(1)(i)	the natural environment (including known significant environmental values, resources or hazards) and the existing uses and approved uses of land in the vicinity of the proposed development,	The proposal is considered to be consistent with the low density and single storey nature of the surrounding land area.
		A Flora and Fauna Assessment Report and Preliminary Site Contamination Report will be required to be lodged with any future development application.
(5)(b)(1)(ii)	the impact that the proposed development is likely to have on the uses that, in the opinion of the relevant Panel, are likely to be the future uses of that land,	The proposal will not impact on the future use of the land. The residue will continue to be utilised for small scale primary production purposes.
		A Traffic Impact Assessment will be required to be lodged with any future development application.
(5)(b)(iii)	the services and infrastructure that are or will be available to meet the demands arising from the proposed development (particularly, retail, community, medical and transport services having regard to the location and access requirements set out in clause 26) and any proposed financial arrangements for infrastructure provisions,	Services are available to the site subject to upgrading/augmentation.
(5)(b)(iv)	in the case of applications in relation to land that is zoned open space or special uses—the impact that the proposed development is likely to have on the provision of land for open space and special uses in the vicinity of the development arrangements for infrastructure provisions,	N/A
(5)(b)(v)	without limiting any other criteria, the impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing uses, approved uses and future uses of land in the vicinity of the development,	The proposal is consistent with the low density and single storey nature of the surrounding land area.

### Council consideration against the SEPP

(5)(b)(vi)	if the development may involve the clearing of native vegetation that is subject to the requirements of section 12 of the <i>Native Vegetation Act 2003</i> —the impact that the proposed development is likely to have on the conservation and management of native vegetation,	The submitted report states the development does not require the removal of any native vegetation as defined by the <i>Native Vegetation Act</i> <i>2003.</i> No evidence has been submitted to support this statement. A Flora and Fauna Assessment Report will be required to be lodged with any future development application.
(5)(b)(vii)	the impacts identified in any cumulative impact study provided in connection with the application for the certificate	N/A

### **General comments from Council**

### <u>Stormwater</u>

A stormwater strategy has been submitted for consideration as part of the SCC application (Attachment A3). Although the on-site management of stormwater has been considered, Council reiterates that the site does not adjoin a natural waterway or suitable stormwater infrastructure. As such, the developer would need to investigate all options for drainage, including acquisition of easements over downstream properties to discharge minor and major stormwater overland flows.

This would need to form part of ongoing investigations and discussions with Council for any future development application.

### Sewer

The subject land cannot be serviced by the existing gravity reticulation system and a sewerage pumping station is required to service the proposed development.

Council has calculated the design loadings based on the proposed number and size of the dwellings having regard to the RPS Sewer Servicing Strategy Report (Attachment A5). The outcome is that there is capacity in the existing Darrell Road Sewerage Pumping Station to accept gravity flows from the proposed development.

The developer would be responsible for all costs associated with investigations and any infrastructure required to service the development.

### Water

Council's consultants have completed an assessment of the capacity of the system to meet the additional demands of the proposed development. The analysis indicates that there is adequate capacity to meet the demands of the current proposal.

The developer would be responsible for all costs associated with investigations and any infrastructure required to service the development.

### <u>Traffic</u>

Council maintains their previous advice that a Traffic Impact Assessment (TIA) would be required to be lodged with any future development application. The TIA should investigate the current capacity of the surrounding road network and if any intersection treatment/road upgrades will be required.

It is noted, that Calala Lane already experiences significant volumes of traffic during peak periods which impacts the operation of the road network. Council would need to consider whether the surrounding road network could cater for the proposed development without significantly reducing the Level of Service and/or capacity.

An assessment of any traffic impacts could be undertaken prior to lodgement of a development application and after a SCC has been obtained.

### Transmission Easements

Council maintains their previous advice relating to transmission easements and advises that consultation would be required between the developer and Essential Energy and/or Transgrid.

An assessment of the transmission easements could be undertaken prior to lodgement of a development application and after a SCC has been obtained.

### SUITABILITY FOR MORE INTENSIVE DEVELOPMENT

The Panel must not issue a certificate unless it is of the opinion that the site of the proposed development is suitable for more intensive development (clause 24(2)(a)).

### 1. The site of the proposed development is suitable for more intensive development (clause 24(2)(a))

The subject site is located in Calala, a residential suburb situated approximately 8.3km south-east of the Tamworth CBD. Lot 1 DP 220319 is approximately 32.71ha in area with the focus area, the site of the Site Compatibility Certificate (SCC) being approximately 9.5ha (Figure 2). Land surrounding the site is zoned R2 Low Density Residential to the north and R5 Large Lot Residential to the east. Land to the west and south is zoned RU4 Primary Production Small Lots (Figure 4). The land slopes to the south west away from Darrell Road and to a low lying rural area to the west. It is generally cleared, with isolated trees, and has a history of cattle grazing.

Calala is an established residential community comprising a mix of low density and large lot residential development. The residential land use is centred around a neighbourhood centre which has a variety of facilities and services such as a supermarket, childcare centre, tavern, butcher, chemist and doctor's surgery. Tamworth CBD contains a full range of retail, commercial, recreational, health, welfare and educational services and facilities (Figure 5).

Subject to the satisfactory resolution of the issues raised by Council regarding sewer, water, stormwater, traffic and transmission easements, it is considered that the site is suitable for more intensive development.



Figure 5 - Location of services and facilities (source: Six Maps)

### Strategic considerations

### New England North West Regional Plan 2036 (NENW RP)

Council previously advised that the subject site was not suitable for the type of development proposed and that it was not identified in the NENW RP as a future investigation area for residential development. Council has indicated that this advice was provided on the basis that the site was highly constrained by significant servicing and design issues.

Council has confirmed that following a review of the additional documentation provided by the proponent they are now satisfied that there are suitable design measures that would alleviate previous servicing concerns.

They have also indicated that these matters could be adequately addressed at the development application stage. Consequently, Council agree that servicing issues should not prevent approval of an SCC for the subject site nor should development opportunities be restricted on the land, even though it is not identified as a future investigation area in the NENW RP (see Attachment C).

With regard to compliance with the NENW RP, the SCC application and proposed development will satisfy the following Directions:

- Direction 18 Provide great places to live. An important component of this Direction focus growth in existing urban centres, or in areas adjacent to existing urban development to foster liveability and a stronger sense of community.
- Direction 20 Deliver greater housing diversity to suit changing needs. This
  Direction identifies the need for local growth management strategies to cater
  for a changing demographic structure by identifying potential locations for
  retirement villages and nursing homes.

It is considered that the proposed development for seniors housing on the subject site does not compromise the strategic intent of the NENW RP.

### Tamworth Blueprint 100

The current local growth management strategy for Tamworth is Tamworth Blueprint 100 which was endorsed by the Department in 2020 as a component of Council's Local Strategic Planning Statement.

Although the site has not been specifically identified for any form of residential growth, the adjoining suburb of Calala has been identified (Figure 6). In addition, the strategy recognises the demographic trend of an ageing population and the need to accommodate these residents with a wider range of health services, improved public transport and more appropriate housing options.



Figure 6 - Growth Strategy Components (source: Tamworth Blueprint 100)

### COMPATIBILITY WITH THE SURROUNDING ENVIRONMENT AND LAND USES

The Panel must not issue a certificate unless it is of the opinion that the proposed development for the purposes of seniors housing is compatible with the surrounding environment and surrounding land uses having regard to the following criteria (clause 25(5)(b)) and clause 24(2)(b)):

### 1. The natural environment (including known significant environmental values, resources or hazards) and the existing and approved uses of land in the vicinity of the proposed development (clause 25(5)(b)(i))

### **Bushfire**

The site is not mapped as bushfire prone.

### Flora and Fauna

The SCC application does not contain a Flora and Fauna Assessment Report. The site has historically been used for grazing and contains limited vegetation. It is considered that any potential ecological impacts could be considered and addressed at the development application stage. Council has advised a Flora and Fauna Assessment Report would need to be prepared to accompany any future development application.

### Flooding

The site is not mapped as flood planning area.

### Contamination

The proponent states that contaminants are not known to exist on the site. However, having regard to the past agricultural use of the land, further investigations in relation to potential contamination would be necessary should this application proceed to a development application.

### Existing and approved uses in the vicinity

The subject site is located adjoining the existing residential suburb of Calala which contains a mix of low density and large lot residential development. No potential impacts on existing and approved uses in the area that could not be adequately considered and addressed at the development application stage have been identified.

## 2. The impact that the proposed development is likely to have on the uses that, in the opinion of the Panel, are likely to be the future uses of that land (clause 25(5)(b)(ii))

The subject site is zoned RU4 Primary Production Small Lots under the Tamworth Regional LEP 2010. It is noted that a range of uses are permitted in this zone including Agricultural produce industries; Cellar door premises; Dual occupancies (attached); Dwelling houses; Farm buildings; Intensive plant agriculture; Kiosks; Landscaping material supplies; Light industries; Markets; Plant nurseries; Roadside stalls and Rural workers' dwellings. It is intended that the residue will continue to be used for low scale agricultural purposes such as cattle grazing.

As noted previously in the report, the current local growth management strategy for Tamworth is Tamworth Blueprint 100 endorsed by the Department in 2020 as a component of Council's Local Strategic Planning Statement. The strategy does not specifically identify the subject site for any form of residential growth, but the adjoining suburb of Calala is identified (Figure 6). The Strategy also recognises and acknowledges the demographic trend of an ageing population.

As seniors housing is a form of residential accommodation, the proposal is considered to be consistent with the existing and likely future residential nature of the area. Residential development of the site has not progressed to date due to the limitations associated with the supply of infrastructure. However, it is considered that sufficient investigation has now been undertaken to enable these matters to be addressed at the development application stage.

# 3. The services and infrastructure that are or will be available to meet the demands arising from the proposed development (particularly, retail, community, medical and transport services having regard to the location and access requirements set out in clause 26) and any proposed financial arrangements for infrastructure provision (clause 25(5)(b)(iii))

### Retail, Community and Medical Services

The SCC application confirms that the proposed development is for serviced selfcare housing. By definition, serviced self-care housing is seniors housing that consists of self-contained dwellings where meals, cleaning services, personal care and nursing care are provided on the site. The proposed development will contain a café, community centre, pool, tennis court and mixed- use premises for a neighbourhood shop and general practitioner premises as well as the on-site provision of meals to the residents. The operational details of these on-site services/facilities have not been provided, but it is considered that this can be adequately addressed at the development application stage. The site is in close proximity to the Calala neighbourhood centre which contains a range of services and facilities. The proponent has committed to servicing the development with a private bus so that all residents are able to access these services and facilities.

It is considered that the retail, community and medical services within close proximity to the subject site are adequate for meeting the needs of future residents and that residents will be able to access various services and facilities through the operation of a private bus service. Council should ensure that any development consent issued for seniors housing on the subject site is conditioned to require the provision of a private bus service for residents.

### Transport Services

The proposed development site is not located on an existing bus route. The closest bus stop is approximately 240m via a roadway that has a gradient in excess of that suitable in accordance with the clause 26(2)(a) of the SEPP.

The SCC application indicates that the proponent has commenced discussions with the operators of Tamworth Buslines to secure a bus stop at the bottom of Darrell Road, outside the main entrance to the proposed development. The location of a bus stop at this site would require a significant road upgrade, an issue that the SCC application has not addressed.

In the absence of agreement from Tamworth Buslines to provide an additional bus stop at the bottom of Darrell Road, the proponent has committed to operate a private bus service for residents to provide access to services and facilities outside the development. As stated above, Council should ensure that any development consent issued for seniors housing on the subject site is conditioned to require the provision of a private bus service for residents.

### **Stormwater**

A stormwater strategy has been submitted for consideration as part of the SCC application (Attachment A3). Council has stated that although management of stormwater onsite has been considered, there are still some outstanding issues. These issues pertain to the discharge of stormwater from the site as there is no natural waterway or stormwater infrastructure present. As such the developer would need to investigate all options, including potentially obtaining easements over downstream properties to suitably discharge minor and major stormwater overland flows.

The proponent has acknowledged that further work is required in relation to stormwater drainage and requested that the additional work be undertaken prior to lodgement of a development application and after a SCC has been obtained. Council recognises that stormwater will be the subject of ongoing investigations and discussions for the future development application and support this approach.

### Water

Council originally identified that the land would need to be serviced by the Calala Pressure Booster system and that Council's current water strategy made no allowance for servicing from this system.

Following further investigations in relation to the demands of the proposal on the Calala Pressure Booster System, Council's consultants have completed an

assessment of the system's capacity. The analysis indicates that there is adequate capacity to meet the demands of the current proposal.

Based on the advice of Council in relation to water supply, the site is considered to be suitable for more intensive development and the specific requirements for the provision of a reticulated water supply can be addressed at the development application stage.

### <u>Sewer</u>

Council previously indicated that the subject land could not be serviced by the existing gravity reticulation system and that a sewerage pumping station would be required to service the proposed development.

Council has now considered the sewer loading calculations provided by the proponent in the RPS Sewer Servicing Strategy Report (Attachment A5) and recalculated the design loadings based on the proposed number and size of the dwellings proposed. The outcome is that there is capacity in the existing Darrell Road Sewerage Pumping Station to accept gravity flows from the proposed development.

Therefore, the site appears to be capable of accommodating more intensive development, and it is considered that the specific requirements for the provision of sewer infrastructure to the site can be addressed at the development application stage.

### **Traffic**

The concept plan for the proposed development indicates that vehicle access will be obtained from Darrell Road which is a collector road within the suburb of Calala. Calala Lane, the main arterial road connecting the suburb with the New England Highway, is located approximately 900m from the subject site.

It is anticipated that the development will generate an increase in daily traffic movements. The SCC application does not contain information in relation to the impact of additional traffic movements on the road network in the vicinity of the development, but states that both Calala Lane and Darrell Road appear to be operating under capacity given the design would have anticipated the eventual extension of Darrell Road.

Council has identified that Calala Lane already experiences significant volumes of traffic during the peak periods which impacts upon the operation of the road network, and that a Traffic Impact Assessment (TIA) would be required to be prepared and lodged with any future development application. The TIA should investigate the current capacity of the surrounding road network and if any intersection treatment/road upgrades would be required.

Council nominates that an assessment of any traffic impacts could be undertaken prior to lodgement of a development application after a SCC has been obtained.

### Transmission Easements

There have been no further investigations undertaken in relation to the potential impact of the proposed development on the transmission easements that traverse the site.

Council nominates that an assessment of the transmission easements could be undertaken prior to lodgement of a development application and after a SCC has been obtained.

4. In the case of applications in relation to land that is zoned open space or special uses—the impact that the proposed development is likely to have on the provision of land for open space and special uses in the vicinity of the development (clause 25(5)(b)(iv))

The subject land is not zoned for open space or special uses.

5. Without limiting any other criteria, the impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing uses, approved uses and future uses of land in the vicinity of the development (clause 25(5)(b)(v))

The surrounding development predominantly consists of low density residential dwellings set on large lots ranging from 1000m<sup>2</sup> to in excess of 1 hectare. The SCC application concept drawing (Figure 3) shows a range of one, two and three bedroom living units located across the focus area.

There no dwellings proposed within 20m the transmission line that runs through the site. There are 20 x one-bedroom living units located on the northern side of the site near the entrance plus six of the proposed 30 x two-bedroom units. These will be terraced into the natural slope of the site. As these units are located along the boundary with the adjoining R2 zoned land, a vegetated buffer is proposed to address privacy issues with the nearby residences. A vegetated buffer is also proposed around the perimeter of the focus area. The centre and south of the site will contain the remaining 24 x two-bedroom and 19 x threebedroom units (Figure 7).



Figure 7 - Lot layout showing transmission easement and proposed vegetation buffer (source: SCC application report – Perception Planning)

It is considered that the proposal is consistent with the low density and single storey nature of the surrounding land and is compatible with the existing, approved and future uses of land.

6. If the development may involve the clearing of native vegetation that is subject to the requirements of section 12 of the *Native Vegetation Act 2003*—the impact that the proposed development is likely to have on the conservation and management of native vegetation (clause 25(5)(b)(vi))

The *Native Vegetation Act 2003* has been repealed and does not apply to the proposal.

The site is generally cleared of native vegetation with only some isolated mature trees remaining. As such, it is not anticipated that the proposed development will result in a significant detrimental impact to existing native vegetation.

Council has stated that although the submitted report indicates that no native vegetation as defined by the *Native Vegetation Act 2003* will be removed, no evidence has been submitted to support this statement. As such, a Flora and Fauna Assessment Report will need to be prepared and lodged with any future development application.

It is considered that native vegetation can be adequately addressed at the development application stage, including any offsets required as a result of clearing in accordance with the requirements of the *Biodiversity Conservation Act 2016*.

### 7. The impacts identified in any cumulative impact study provided in connection with the application for the certificate (clause 25(5)(b)(vii))

As previously discussed in this report, a cumulative impact study pursuant to clause 25(2)(c) of the SEPP is not required as there are no current or undetermined SCCs on land within a one kilometre radius of the subject site.

### CONCLUSION

In order for a Site Compatibility Certificate (SCC) to be issued, the land must be subject to the SEPP, meet the adjoining zone boundary provisions and be considered suitable for more intensive development. In addition, a SCC cannot be issued for that part of the land which is 'environmentally sensitive land' as described in Schedule 1 of the SEPP.

It is considered that the site is suitable for seniors housing for the following reasons:

- dwellings houses are permissible in Zone RU4 Production Small Lots pursuant to the Tamworth Regional LEP 2010;
- the site adjoins land zoned for urban purposes, being Zone R2 Low Density Residential;
- the land to which the SCC applies is not affected by any of the exclusions contained in Schedule 1 of the SEPP;
- the site has no major physical constraints which cannot be mitigated;
- sufficient investigation has been undertaken to confirm infrastructure can be provided to the site;
- the site is within proximity to developed urban land and has accessibility to a full range of retail, commercial, recreational, health, welfare and educational facilities at Calala and Tamworth.

Should an SCC be issued for the site, it is considered appropriate that conditions be imposed requiring the resolution of issues relating to:

- a) stormwater;
- b) water;
- c) sewer;
- d) traffic;
- e) land contamination;
- f) flora and fauna impacts;
- g) operation of a private bus service for residents; and
- h) preparation of meals on-site for residents

### ATTACHMENTS

- A1 SCC Application Applicant's Report
- A2 SCC Application Preliminary Plans
- A3 SCC Application Stormwater Strategy Report
- A4 SCC Application Deposited Plan 47 Darrell Rd, Calala
- A5 SCC Application Servicing Strategy
- A6 SCC Application Council letter to DPIE 28 May 2019
- A7 SCC Application Consultant letter to Council 8 February 2020
- B Site Map
- C Previous refused SCC
- D Council comments

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