



Transitional Supported Accommodation

Lot 22 Stuart Street Mullumbimby

Planning Advice

Prepared for Byron Shire Council
by MikeSvikisPlanning
22 September 2021

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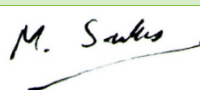
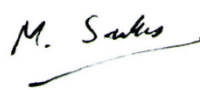
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1 INTRODUCTION

On 5 August 2021, Byron Shire Council resolved as follows:

21-273 Resolved that Council:

1. *Requests staff to prepare a report to Council prior to submitting a development application and any required supporting local approval applications for a “Transitional Supported Accommodation” development made under existing definitions in the Local Environmental Plan 2014, on that part of Lot 22 identified for Affordable Housing in the “Plan of Management Community Land Mullumbimby Sports Fields” that meets the following parameters:*

“Transitional Supported Accommodation” is temporary accommodation to bridge the gap from those in insecure housing or at risk of homelessness to permanent housing and is located as close as possible to existing residential facilities and social support services.

“Temporary accommodation” is a residential use or development for a period of not more than 48 months from the date on which an occupation certificate is issued under the Act.

2. *N/A*
3. *N/A*
4. *Provides a report on any Council land zoned RE1 and the barriers which would prevent it under the current rules from providing emergency accommodation as per 1. above.*
(Lyon/Ndiaye)

1.1 Purpose of this report

The purpose of this report is to outline the planning controls that apply to the subject land and the constraints and opportunities that are relevant in the preparation of a development application for Transitional Supported Accommodation (point 1). It will also assess the planning controls that may limit the use of any land zoned RE1 for emergency accommodation (point 4).

2 SUBJECT LAND

The subject land is a 3.4-hectare part of Lot 22 DP 1073165, Stuart Street Mullumbimby (Figure 1). This is the balance of the larger area that was previously considered for a rezoning to enable residential development. This small piece is located at the eastern end of Lot 22, across the railway line, and is bounded by Saltwater Creek. It was identified in a plan of management for Community land in 2008 as a potential location for affordable housing (Figure 2).

Figure 1: Cadastre for Lot 22 DP 1073165, Stuart Street Mullumbimby

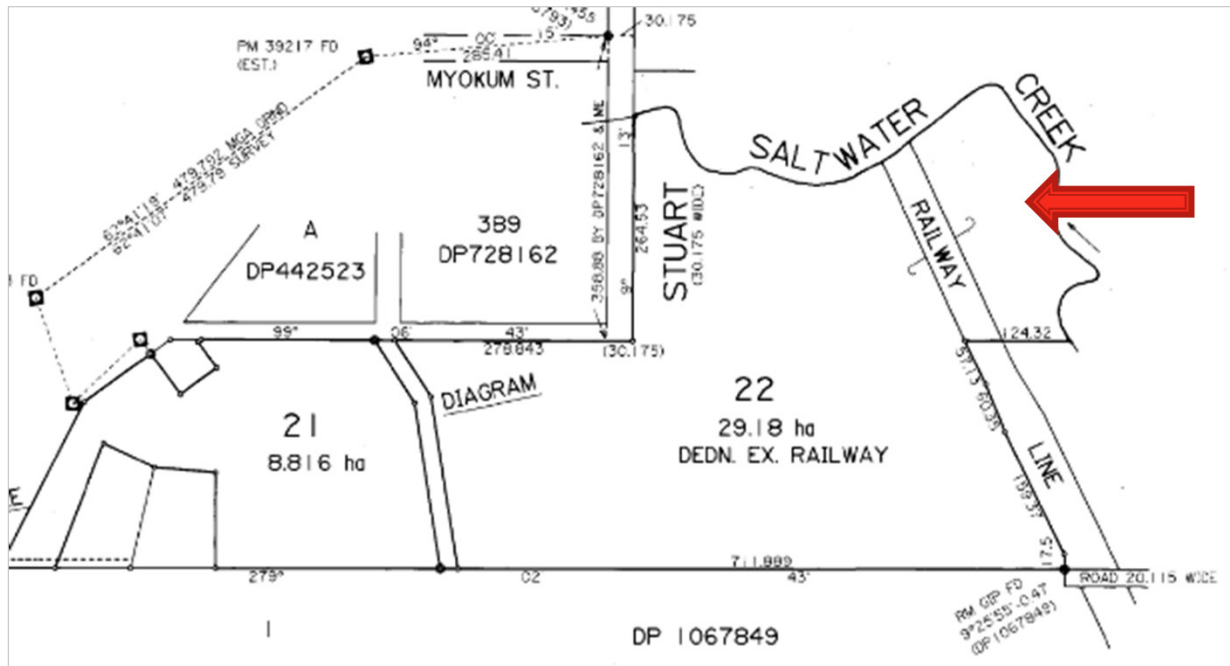


Figure 2: Proposed land use from "Plan of Management – Community Land Mullumbimby Sports Fields" adopted in 2008



3 PLANNING CONTROLS

3.1 What is Transitional Supported Accommodation?

Transitional Supported Accommodation is a term used in a range of circumstances to describe places where people can live for a period of time until a more permanent option becomes available. It may be a place to live for less than three months (typically short term) or for longer than three months, but not forever.

Transitional Supported Accommodation is not a term specifically defined in NSW planning instruments such as Byron LEP 2014. This LEP defines **residential accommodation** as follows:

residential accommodation means a building or place used predominantly as a place of residence, and includes any of the following—

- (a) attached dwellings,
- (b) boarding houses,
- (c) dual occupancies,
- (d) dwelling houses,
- (e) group homes,
- (f) hostels,
- (g) multi dwelling housing,
- (h) residential flat buildings,
- (i) rural workers' dwellings,
- (j) secondary dwellings,
- (k) semi-detached dwellings,
- (l) seniors housing,
- (m) shop top housing,

but does not include tourist and visitor accommodation or caravan parks.

Depending on the style of Transitional Supported Accommodation proposed, it would normally be characterised as a residential use that falls within this definition.

However, it could be argued that Transitional Supported Accommodation can also be undertaken on sites nominated for permanent occupation in an approved **caravan park** and this is a separately defined use as follows:

caravan park means land (including a camping ground) on which caravans (or caravans and other moveable dwellings) are, or are to be, installed or placed.

This definition references **moveable dwellings** and this is defined as follows:

moveable dwelling means—

- (a) any tent, or any caravan or other van or other portable device (whether on wheels or not), used for human habitation, or
- (b) a manufactured home, or
- (c) any conveyance, structure or thing of a class or description prescribed by the regulations (under the Local Government Act 1993) for the purposes of this definition.

3.2 Does Byron LEP 2014 or Byron LEP 1988 permit these land uses on the subject land?

The subject land is zoned mostly RE1 Public Recreation under Byron LEP 2014 (Figure 3). However, a 30-metre-wide strip near Saltwater Creek is a Deferred Matter. This strip is zoned 7B Coastal Habitat under Byron LEP 1988 (Figure 4).

Figure 3: Land zoning under Byron LEP 2014

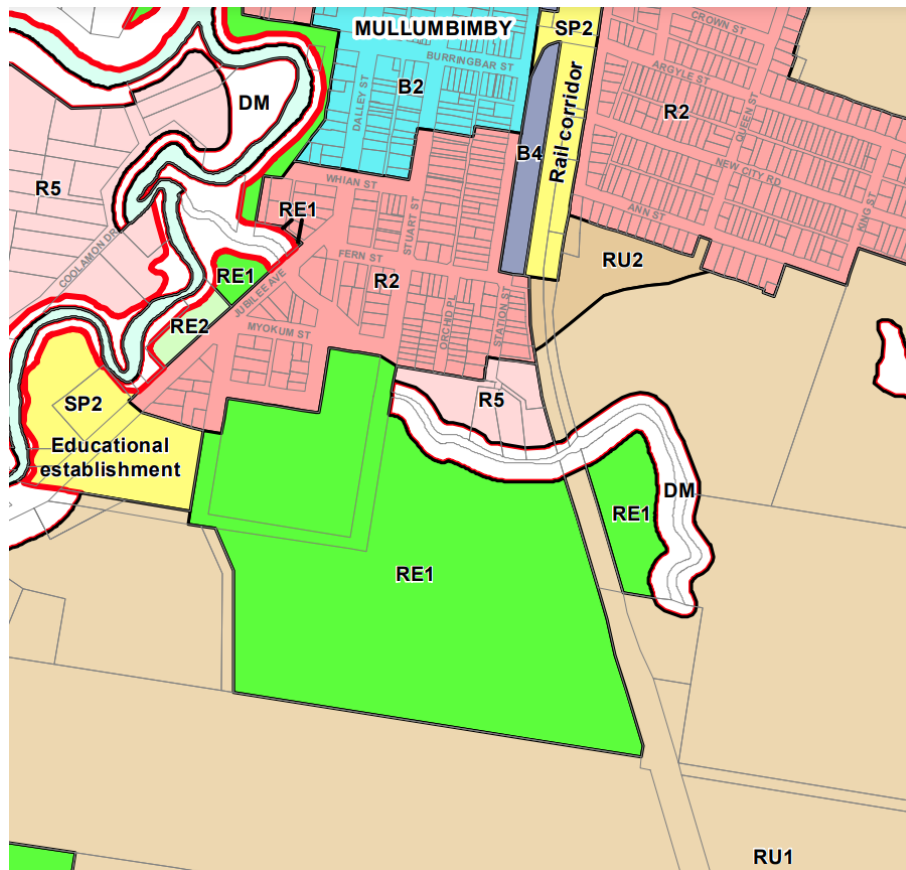
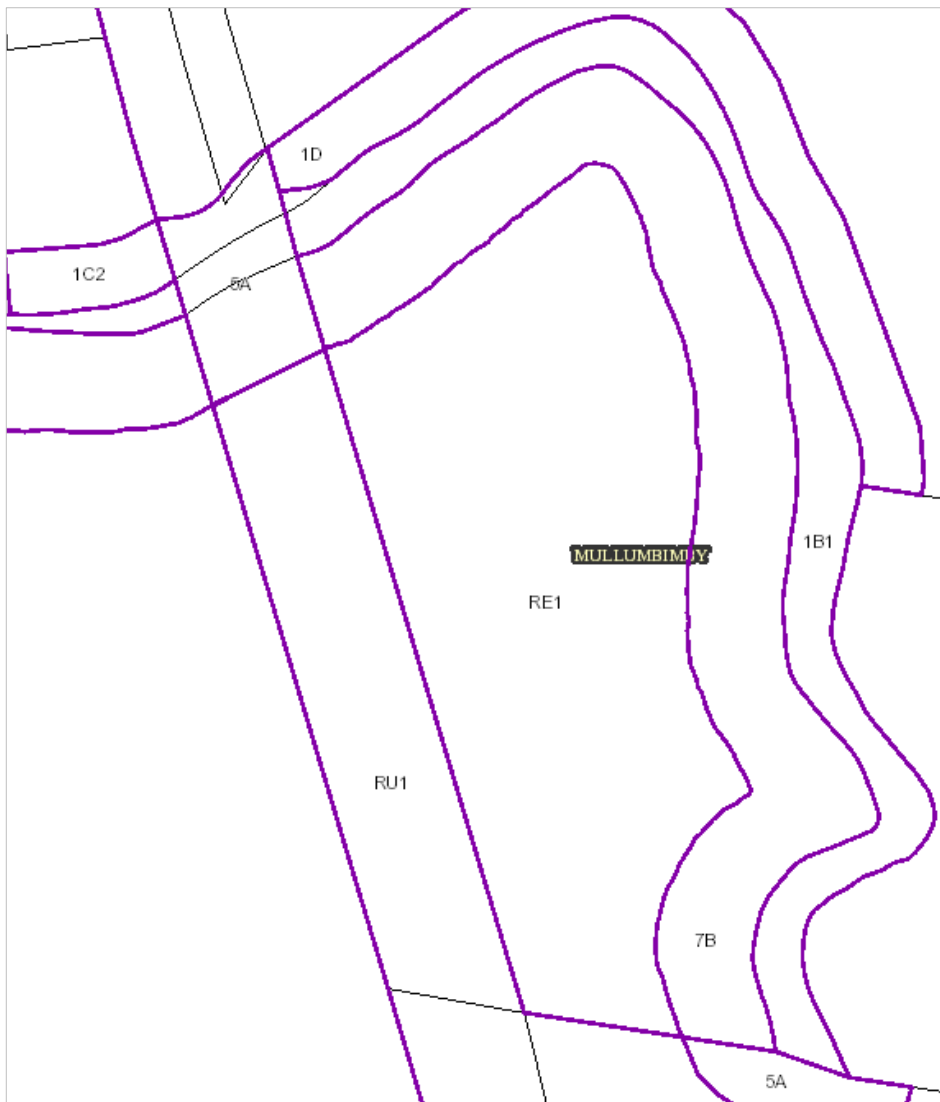


Figure 4: Land zoning under Byron LEP 1988



The land use table for the RE1 zone is as follows:

Zone RE1 Public Recreation

1 Objectives of zone

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

2 Permitted without consent

Environmental protection works

3 Permitted with consent

Aquaculture; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Centre-based child care facilities; Community facilities; Emergency services facilities; Entertainment facilities; Environmental facilities; Flood mitigation works; Function centres; Horticulture; Information and education facilities; Jetties; Kiosks; Markets; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Respite day care centres; Restaurants or cafes; Roads; Signage

4 Prohibited

Any development not specified in item 2 or 3

Within the RE1 Public Recreation zone, **residential accommodation** is a prohibited use but **caravan parks** are permitted with Council consent. Within the 7B Coastal Habitat zone, both **dwelling**s and **caravan parks** are a prohibited use.

It is also useful to consider the objectives of the RE1 zone. These objectives indicate that it is not the intention of this zone to provide residential accommodation. A caravan park aimed at the tourist related market would be more likely to achieve these zone objectives than one dedicated to providing temporary accommodation for singles and families to live in for up to 48 months. Clause 2.3(2) of Byron LEP 2014 states:

The consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.

Although this clause does not require a development to be consistent with the zone objectives, Council would still need to justify the inconsistency on the basis of site suitability and the merits of the development proposed.

A suite of performance criteria for the assessment of caravan parks is included in Byron Shire Development Control Plan 2014 – Chapter D3. An extract is at Appendix A. These need to be addressed in a development application for a caravan park.

3.3 Do any of the SEPPs permit these land uses on the subject land?

SEPP No 21 – Caravan Parks

This SEPP was gazetted in 1992 primarily to ensure that councils require development consent for caravan parks where it is otherwise a permitted land use. It does not enable the use of itself. The SEPP makes it a requirement that the number of long-term and short-term sites be specified and that only long-term sites can be occupied for a period of more than three months. It also sets out matters that a council must consider in assessing a development application for a caravan park as follows:

A Council may grant a development consent required by this Policy only after it has considered the following—

- (a) *whether, because of its location or character, the land concerned is particularly suitable for use as a caravan park for tourists or for long-term residence,*
- (b) *whether there is adequate provision for tourist accommodation in the locality of that land, and whether existing or potential tourist accommodation will be displaced by the use of sites for long-term residence,*
- (c) *whether there is adequate low-cost housing, or land available for low-cost housing, in that locality,*
- (d) *whether necessary community facilities and services are available within the caravan park to which the development application relates or in the locality (or both), and whether those facilities and services are reasonably accessible to the occupants of the caravan park,*
- (e) *any relevant guidelines issued by the Director, and*
- (f) *the provisions of the Local Government (Caravan Parks and Camping Grounds) Transitional Regulation 1993.*

Therefore, SEPP No 21 does not permit the subject land to be used for Transitional Supported Accommodation. It does provide a suite of matters that need to be addressed in a development application for a caravan park.

SEPP No 36 – Manufactured Home Estates

This SEPP was gazetted in 1993. It defines a manufactured home estate and enables it to be approved on any land on which a caravan park is a permitted use, with a number of critical exceptions as follows:

Development for the purposes of a manufactured home estate may be carried out pursuant to this Policy on any land on which development for the purposes of a caravan park may be carried out, except—

- (a) *land within one or more of the categories described in Schedule 2, or*
- (b) *land dedicated or reserved under the National Parks and Wildlife Act 1974, or*
- (c) *land within a Crown reserve.*

Schedule 2 lists the following:

- 6 *Land which under any environmental planning instrument is within an area or zone identified in that instrument by the description—*
 - *open space, other than open space (private recreation)*
 - *environmental protection*
 - *scenic protection*
 - *rural (where the land is not adjacent to or adjoining land zoned for urban use).*

The subject land is zoned mostly RE1 Public Recreation under Byron LEP 2014 and partly 7B Coastal Habitat under Byron LEP 1988. RE1 is the equivalent of an Open Space zone and 7B is equivalent to an Environmental Protection zone.

On this basis, SEPP No 36 cannot be used to permit a manufactured home estate on the subject land and therefore does not enable Transitional Supported Accommodation.

SEPP (Affordable Rental Housing) 2009

This SEPP was gazetted in 2009. It identifies a range of different housing options that might be used for affordable housing for different end users. These uses include infill housing, secondary dwellings, boarding houses, supportive accommodation, residential flat buildings, build-to-rent housing and group homes. However, it stipulates that either the use must already be permitted by another planning instrument or the proposed use is located in a residential zone or for some uses a business zone or special purposes zone.

On this basis, SEPP (Affordable Rental Housing) 2009 cannot be used to permit Transitional Supported Accommodation on the subject land.

SEPP (Housing for Seniors or People with a Disability) 2004

This SEPP was gazetted in 2004. It specifically enables certain housing development even if it is not otherwise permitted by a planning instrument. It applies generally to urban zoned land and to land adjoining urban zoned land. However, it states in clause 4 that:

(6) Land to which Policy does not apply

This Policy does not apply to—

- (a) *land described in Schedule 1 (Environmentally sensitive land),*

Schedule 1 states:

Land identified in another environmental planning instrument by any of the following descriptions or by like descriptions or by descriptions that incorporate any of the following words or expressions—

- (a) coastal protection,*
 - (b) conservation (but not land identified as a heritage conservation area in another environmental planning instrument),*
 - (c) critical habitat,*
 - (d) environment protection,*
 - (e) open space,*
- etc

The subject land is zoned mostly RE1 Public Recreation under Byron LEP 2014 and partly 7B Coastal Habitat under Byron LEP 1988. RE1 is the equivalent of an Open Space zone and 7B is equivalent to an Environmental Protection zone.

On this basis, SEPP (Housing for Seniors or People with a Disability) 2004 cannot be used to permit Transitional Supported Accommodation on the subject land.

4 SITE ASSESSMENT

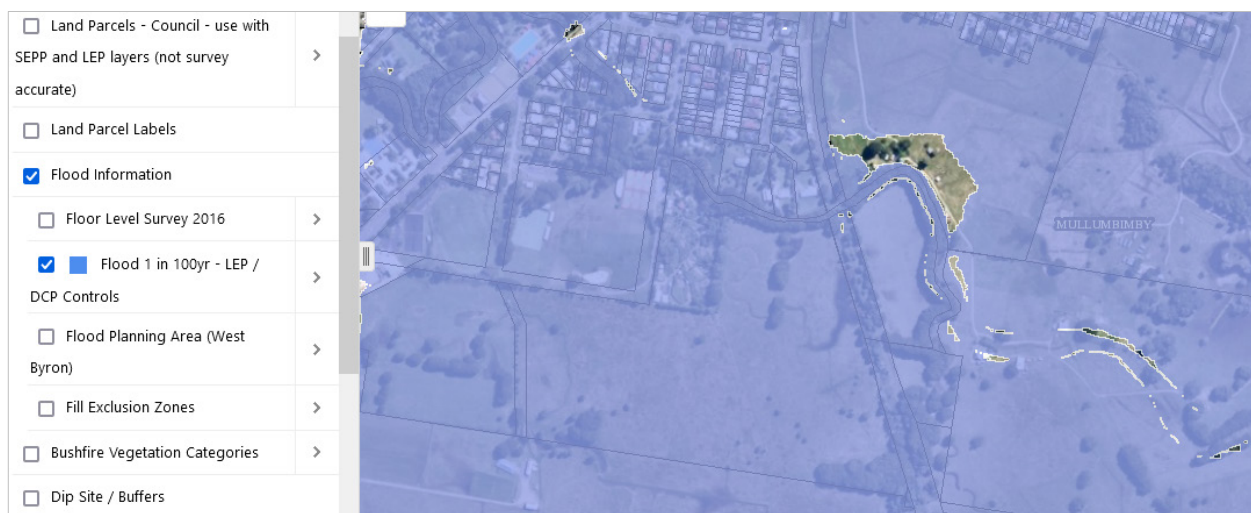
Within the RE1 Public Recreation zone, caravan parks are permitted with Council consent. It could be argued that a caravan park that includes permanent sites on which manufactured homes are located could then be used to supply Transitional Supported Accommodation on the subject land.

However, it is important to assess the merits of this site to gauge if there are other factors that will determine if consent is likely to be issued to undertake the development.

4.1 Flooding

The subject land is entirely affected by flooding in a major (1 in 100-year) event (Figure 5), as is most of Mullumbimby and nearby rural land.

Figure 5: Flood prone land in a 1 in 100-year event



Recently updated flood modelling shows that in a major event the site is subject to:

- A flood depth of approximately 0.5 to 1 metre (Figure 6);
- A flood velocity of 0.2 to 0.75 metres per second (Figure 7); and
- A flood hazard rating of mostly low to intermediate (Figure 8);

The flood modelling also identified a fill exclusion area where it is recommended that the land not be filled (Figure 9). This occupies approximately half of the land between the railway line and Saltwater Creek.

Figure 6: Flood depth modelling for part Lot 22

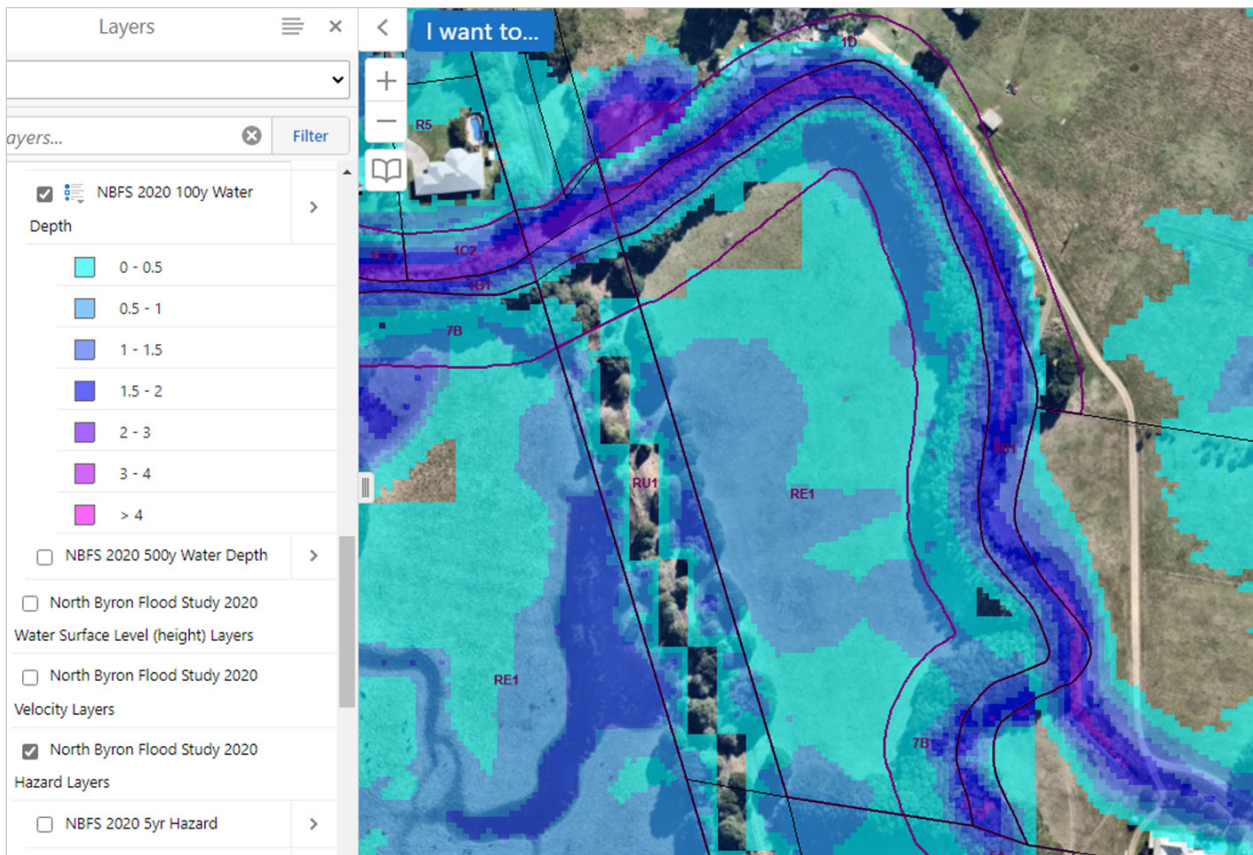


Figure 7: Flood velocity modelling for part Lot 22

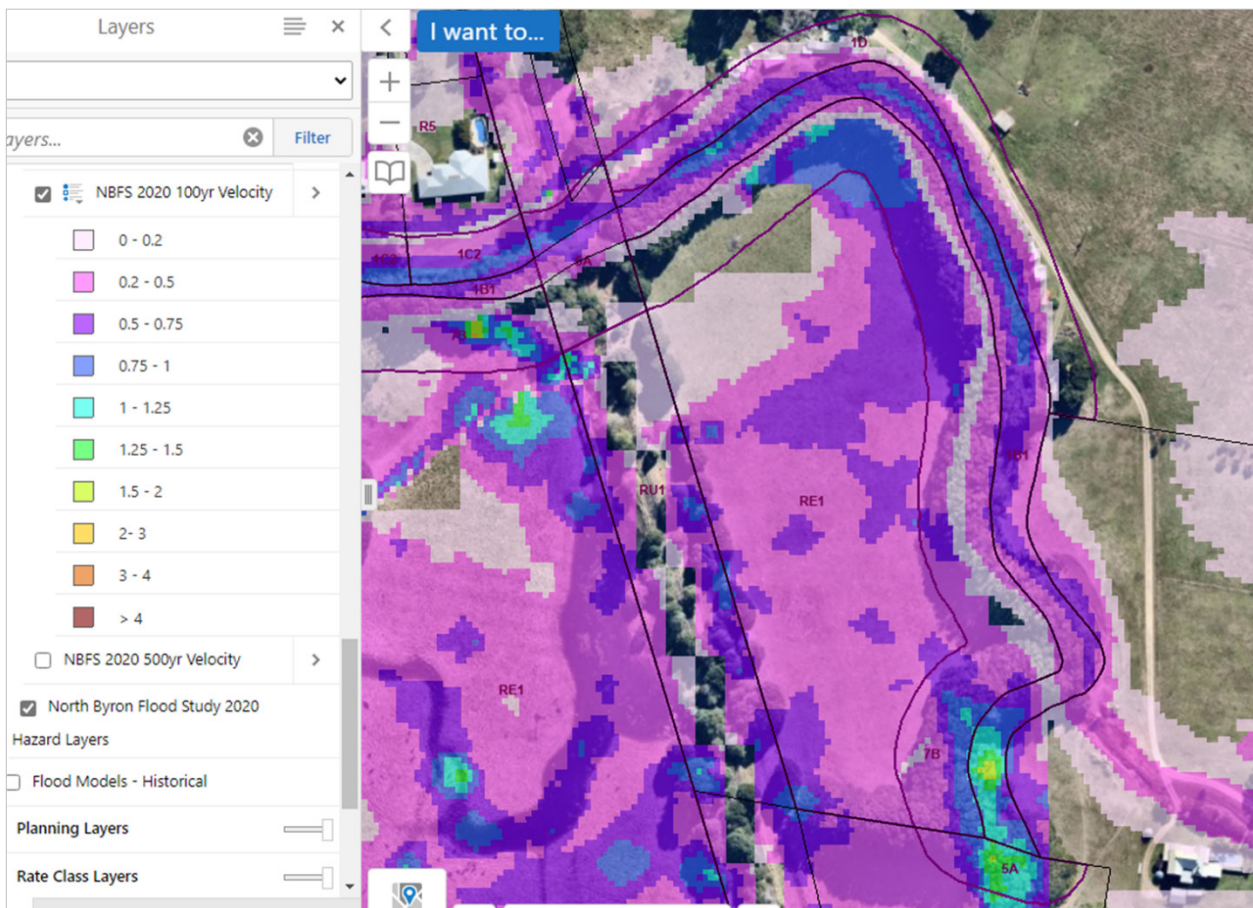


Figure 8: Flood hazard modelling for part Lot 22

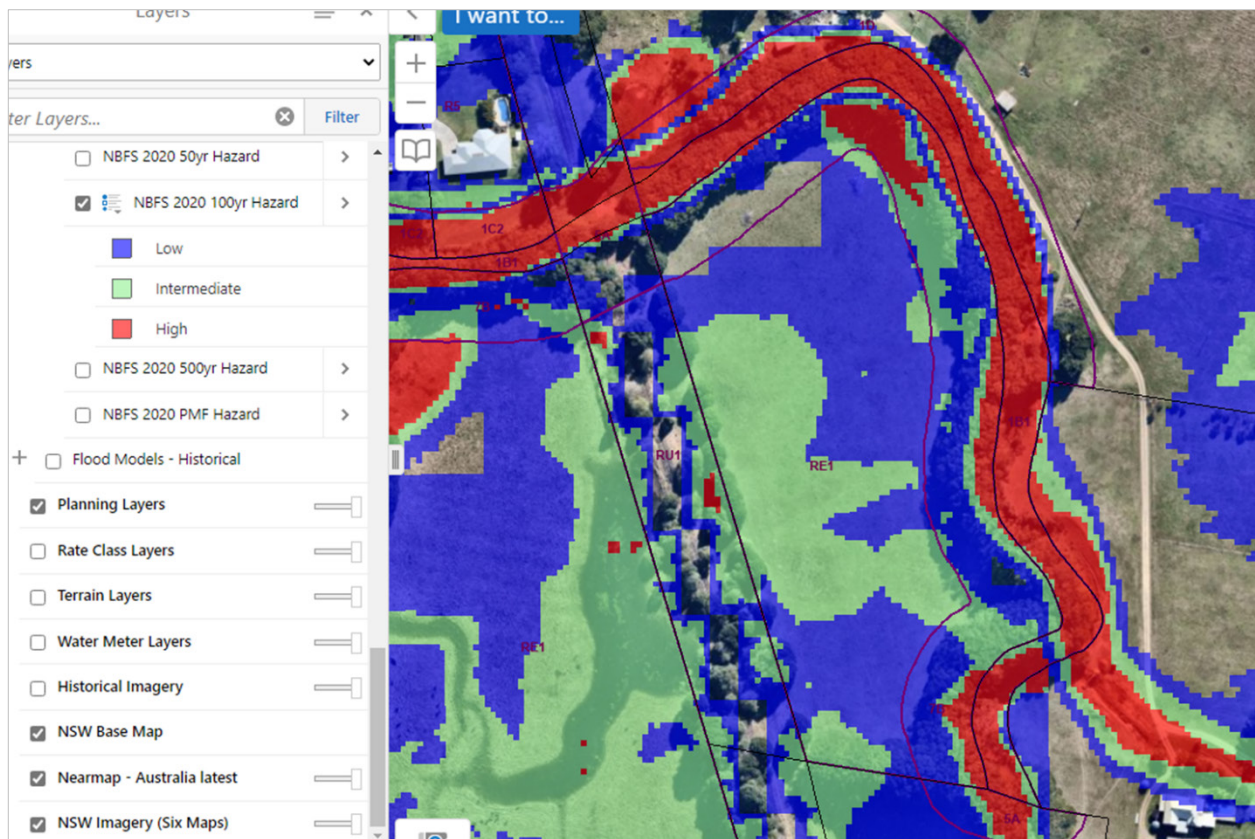
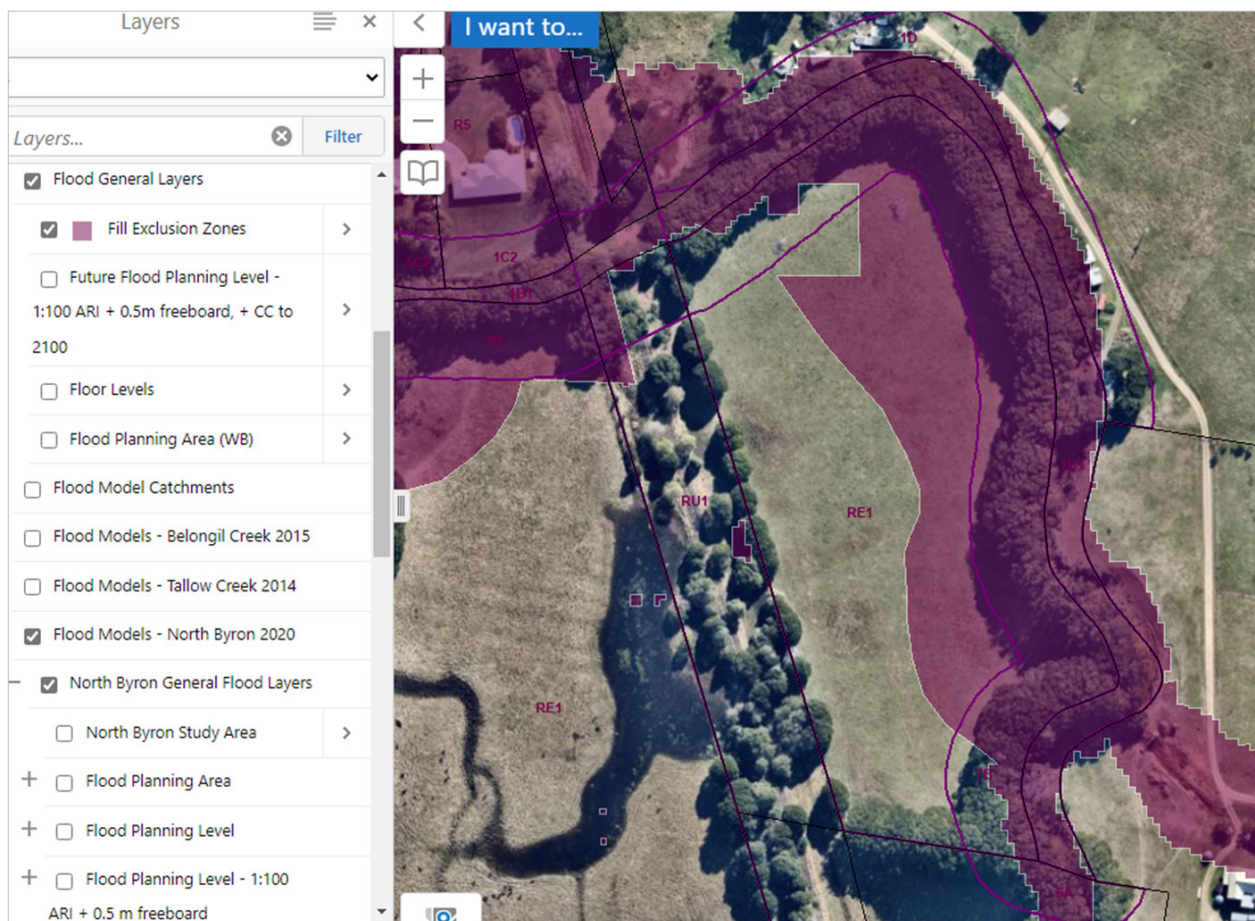


Figure 9: Floodplain fill exclusion modelling for part Lot 22



The subject land is located below the Flood Planning Level and is therefore within the Flood Planning Area. Clause 5.21 of Byron LEP 2014 applies to any development on this land including a caravan park:

Flood planning

- (1) *The objectives of this clause are as follows—*
 - (a) *to minimise the flood risk to life and property associated with the use of land,*
 - (b) *to allow development on land that is compatible with the flood function and behaviour on the land, taking into account projected changes as a result of climate change,*
 - (c) *to avoid adverse or cumulative impacts on flood behaviour and the environment,*
 - (d) *to enable the safe occupation and efficient evacuation of people in the event of a flood.*
- (2) *Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development—*
 - (a) *is compatible with the flood function and behaviour on the land, and*
 - (b) *will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and*
 - (c) *will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and*
 - (d) *incorporates appropriate measures to manage risk to life in the event of a flood, and*
 - (e) *will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.*
- (3) *In deciding whether to grant development consent on land to which this clause applies, the consent authority must consider the following matters—*
 - (a) *the impact of the development on projected changes to flood behaviour as a result of climate change,*
 - (b) *the intended design and scale of buildings resulting from the development,*
 - (c) *whether the development incorporates measures to minimise the risk to life and ensure the safe evacuation of people in the event of a flood,*
 - (d) *the potential to modify, relocate or remove buildings resulting from development if the surrounding area is impacted by flooding or coastal erosion.*
- (4) *A word or expression used in this clause has the same meaning as it has in the Considering Flooding in Land Use Planning Guideline unless it is otherwise defined in this clause.*
- (5) *In this clause—*

Considering Flooding in Land Use Planning Guideline means the Considering Flooding in Land Use Planning Guideline published on the Department's website on 14 July 2021.

flood planning area has the same meaning as it has in the Floodplain Development Manual.

Floodplain Development Manual means the *Floodplain Development Manual* (ISBN 0 7347 5476 0) published by the NSW Government in April 2005.

Normally, the issue of flooding on a site like this would be addressed by filling the land on which long-term accommodation and infrastructure is to be located. This would involve using clean fill to lift the land so that floor levels of habitable structures are at least 500 mm above the 1 in 10-year flood level. In this case, the fill exclusion zone leaves approximately 1.5 hectares of land that can be filled and used for development. However, any fill would need to be flood modelled to ensure it does not adversely alter flood behaviour on other land in the vicinity. Evacuation of the site in a major flood event would also be problematic.

It should be noted that Byron DCP – Chapter D3 (Appendix A) states in D3.3.3: “3. b) [caravan] parks must not disturb water courses and must not be located in low-lying areas with poor drainage, or on flood liable land”. Any application for a caravan park would need to clearly justify the inconsistency with this aspect of the DCP.

4.2 Access and the railway line

An obvious issue with this site is that a disused railway line forms the western boundary of the land. Although not in use, this line has not been abandoned and a train may return to the line at some stage. The reserve in which the line is located is 40 metres wide.

Key areas of potential conflict include danger to pedestrians or vehicles on or crossing the train line; noise from trains; and disturbance from train line repairs/reconstruction or rail trail construction. This would normally be resolved by fencing the line and limiting access to a single crossing. The crossing would need boom gates. A vegetated buffer would also need to be considered as well as sound proofing of any liveable structures.

SEPP (Infrastructure) suggests that development within 25 metres of a rail corridor must be notified to the relevant rail authority. This is a reasonable guide as to what might be imposed as a buffer to the railway reserve. A 25-metre buffer would remove a further 0.5 hectares from the developable area on this site.

There is no formal rail crossing at this point and the NSW rail authority has a policy of not issuing new crossing points easily. It cannot be assumed that the State government will permit a new crossing at this location.

There is discussion that the rail line may become a shared bike and pedestrian path, either permanently or as an interim use (rail trail). This would be a positive outcome for this site, giving it easy access to this facility, removing the potential conflict with an active rail line and creating no new conflict potential.

4.3 Services and infrastructure

Any caravan park proposed for the subject land would need to be adequately serviced with reticulated water, sewerage, flood resilient access road, electricity and communications.

Reticulated water and sewer are not located close to the site and would need to be extended and upgraded to service the site. If this were undertaken in conjunction with residential development of the land to the west of the railway line it would be more cost efficient. Installing water and sewer infrastructure for a small caravan park is likely to be expensive.

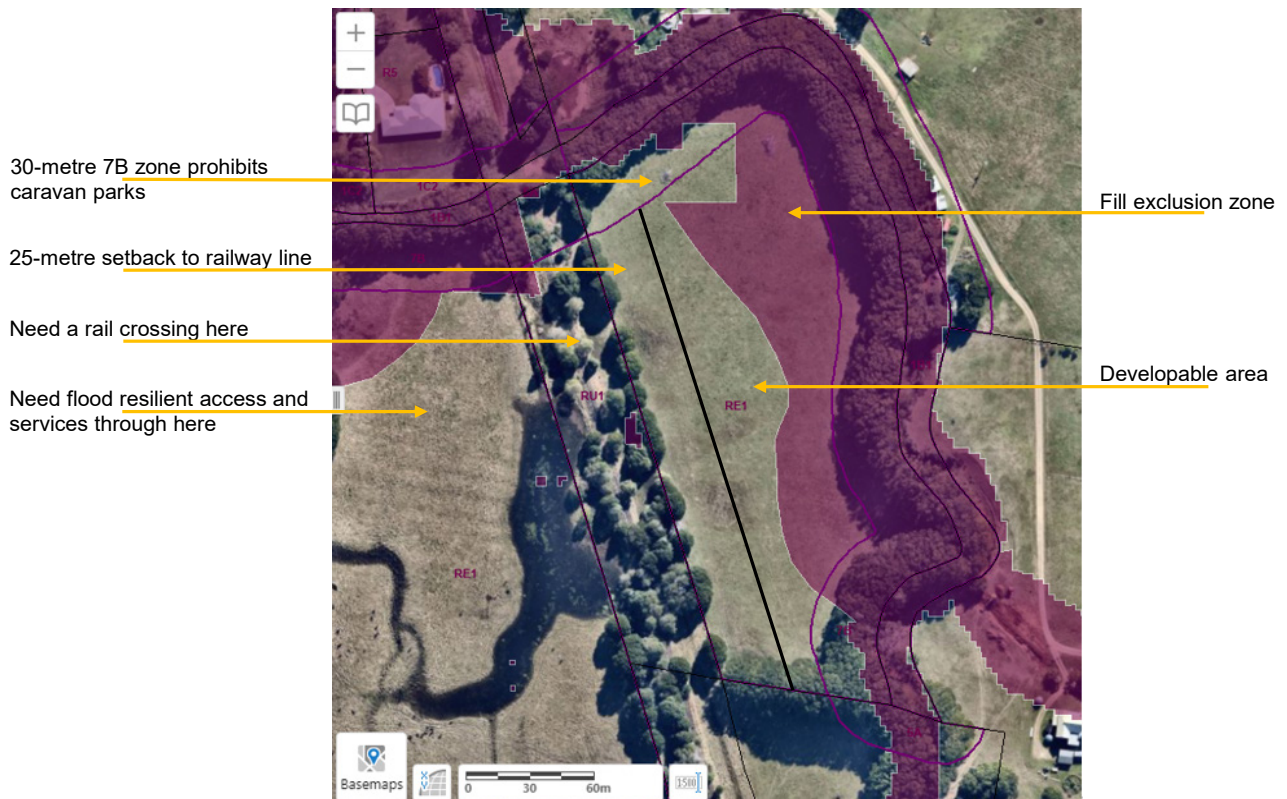
A flood free access (above the flood planning level) is unreasonable in this situation as the urban area of Mullumbimby is also affected in a major flood. It is reasonable that the caravan park is accessible in nuisance flooding and in moderate flooding when Mullumbimby is still substantially accessible. It is assumed that the rail corridor would not be available for a road as it is still required for a train or rail trail. This means that a road would need to be constructed back to Stuart Street, swinging around the southern end of the community garden. This is a distance of approximately 650 metres back to the Stuart Street crossing of Saltwater Creek. This existing low-level crossing has minimal flood immunity and would need to be replaced by a bridge. An alternative would be to construct a 450-metre road to the north, to link up with Ann Street. This would require a new bridge over Saltwater Creek at the site. If it could not be located within the rail corridor then it would require access across private land and this would have to be negotiated with appropriate compensation.

Electricity and modern communications would need to be provided to the subject land. This could be extended from sources in the Stuart Street road reserve, which is located approximately 650 metres to the west.

4.4 Site analysis

A useful way to pull together the site constraints and opportunities is a site analysis that summarises the merit and planning issues. This is included at Figure 10.

Figure 10: Site analysis for part Lot 22



5 CONCLUSION

The purpose of this report is to outline the planning controls that apply to the subject land (part Lot 22) and the constraints and opportunities that are relevant in the preparation of a development application for Transitional Supported Accommodation (point 1).

This report has established that an application for Transitional Supported Accommodation could be prepared for the subject land, but only in the form of a caravan park that includes permanent sites.

However, the subject land is highly constrained and as little as 1 hectare of the 3.4-hectare site is likely to be able to be used as a caravan park. By comparison, the Glen Villa Resort in Byron Bay is located on a 5.5-hectare site with approximately 2.5 hectares allocated to cabins. Moveable dwelling sites are required to be a minimum of 80 m². With fire separation distances and the need for roads, landscaping and other infrastructure, the actual yield is likely to be as low as 40 sites. The cost of extending services to the sites as well as the cost of filling and achieving a flood resilient access across the railway line and back to Stuart Street are likely to be excessive and difficult to balance against the low yield while still achieving low-cost accommodation. It is not certain that access across the rail line would be provided by the NSW government.

A development application for a caravan park to be used for Transitional Supported Accommodation on part Lot 22 would take a long time to prepare and would be expensive. It would have a low probability of success and be expensive to construct and service if it were approved.

It has also been requested to identify the planning controls that may limit the use of any land zoned RE1 for emergency accommodation wherever it may occur (point 4).

Emergency accommodation is not a use defined in Byron LEP 2014 and is therefore a prohibited use in the RE1 zone where all uses not specifically identified as permitted are prohibited. The only potentially useful permitted use is caravan parks.

Although caravan parks are a permitted use in the zone, this does not mean that all land zoned as RE1 is suitable for that use. Being a permitted use means that you can prepare and lodge a development application but it does not mean it has to be approved. The approval process is a merit assessment that is specific to each site.

The objectives of the RE1 zone indicate that it is not the intention of this zone to provide emergency accommodation or residential accommodation. A caravan park that is aimed at the tourist related market (at least in part) is more likely to achieve the zone objectives than one dedicated to providing long-term accommodation for singles and families to live in (long term is greater than three months). Although Byron LEP 2014 does not require a development to be consistent with all of the zone objectives, there is an expectation that Council will still need to justify the inconsistency with the objectives on the basis of the suitability of the site and the merits of the caravan park development proposed. Any application will also need to address the provisions of Byron Shire Development Control Plan 2014 – Chapter D3 section D3.3.3 (Appendix A). Subclause 3. a) to i) provides a good summary of the issues and controls that are likely to limit the use of any land zoned RE1 for a caravan park, including sites for long-term occupation.

The relevant regulation for caravan parks in NSW is the *Local Government (Manufactured Home Estates, Caravan Parks, Camping Grounds and Moveable Dwellings) Regulation 2005*, which sets standards for:

- the design, construction, maintenance and operation of caravan parks and camping grounds;
- the design, construction and installation of manufactured homes and other moveable dwellings; and
- promotion of the health, safety and amenity of the occupiers of those dwellings.

A caravan park would need to comply with this regulation.

An approval under section 68 of the *Local Government Act 1993* is also required to operate a caravan park or camping ground. This must be renewed every five years.

Appendices

Appendix A: Byron Shire Development Control Plan 2014 – Chapter D3

APPENDIX A

Extract from Byron Shire Development Control Plan 2014
Chapter D3

D3.3.3 Caravan Parks and Camping Grounds

Objectives

1. To ensure that the design and operation of **caravan parks** and **camping grounds** will meet the needs of users and will be compatible with the character of existing development in the locality.

Performance Criteria

1. The design of **caravan parks** and **camping grounds** must be compatible with the existing streetscape and character of the precinct in which they are located.
2. **Caravan parks** and **camping grounds** should be designed to avoid adverse effects on the amenity of the precinct in which they are located.
3. The proposed site must be suitable for the development of the **caravan park** or **camping ground**, having particular regard to the following principles:
 - a) steep slopes must be avoided because of drainage, slip and bushfire problems and potential damage to the environment;
 - b) parks must not disturb water courses and must not be located in low-lying areas with poor drainage, or on flood liable land;
 - c) existing vegetation and areas with ecological and conservation values must be protected;
 - d) sites which are difficult to landscape and integrate into the visual environment are unsuitable;
 - e) site layout and landscaping must break up or conceal the repetitive image of caravans and movable dwellings;
 - f) climatically and visually exposed sites such as headlands and ridges are unsuitable;
 - g) location adjacent to incompatible land uses is unacceptable;
 - h) sites must not form a barrier to adjacent public lands (e.g. foreshore areas);
 - i) sites that accommodate or are to accommodate long-term residents must have good access to appropriate services and facilities.
4. A minimum 10% of the total area of the **caravan park** or **camping ground** must be developed for recreation and communal activities. The recreation and communal activities area must not include any caravan site, campsite, roadway or land designated for any other purpose, but may be grassed and landscaped with trees and/ or other plants. A maximum 10% of the recreation area may be used as the site of a building devoted to recreation or communal activities that are appropriate to the proposed mix of occupants and users of the **caravan park**. Any such building must be integrated with the landscape and aesthetic characteristics of the site and the recreation area.
5. Development applications must demonstrate that the proposed development will be consistent with the requirements of Chapters B6 Buffers and Minimising Land Use Conflict, B9 Landscaping, B11 Planning for Crime Prevention and B13 Access and Mobility.
6. Development applications may need to be accompanied by a Social Impact Assessment prepared pursuant to Chapter B12 Social Impact Assessment, where applicable.

Prescriptive Measures

There are no Prescriptive Measures.





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