



REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

TriCare Hastings Point
87 – 89 Tweed Coast Road, Hastings Point | LOT 1 on DP786570

Prepared for TriCare (Hastings)
By Planit Consulting Pty Ltd

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1 Introduction & Overview

Planit Consulting has been engaged by TriCare (Hastings) Pty Ltd to seek Secretary's Environmental Assessment Requirements (SEARs) for the TriCare Seniors Living Development in Hastings Point.

Originally approved in May 2007 by Tweed Shire Council through a local Development Application process, the Seniors Living development at 87-89 Tweed Coast Road, (Lot 1 DP 786570) Hastings Point comprises housing for all levels of seniors' capabilities, from independent living to high care. The approved Seniors Living Development comprises 7 buildings, each standing at 3 storeys. These buildings, along with other site embellishment works, are approved to be delivered across 4 stages of work. The approved Seniors Living Development has been substantially commenced with Stage 1 completed and occupied since 2009. The original consent has been modified a number of times by Tweed Shire Council, associated with some modifications to the approved built form as well as administrative changes to the consent.

Since this time, prospective seniors living residents and their families have demanded higher levels of amenity and quality of life, by way of increased housing diversity, autonomy, and privacy. Specifically, this includes an ability to age in place, as supported by a building design that meets contemporary standards and expectations, such as larger unit spaces, expanded facilities, and improved care and service.

Accordingly, in June 2020, TriCare sought to alter the building design and layout of the remaining stages of the Seniors Living Development through a Modification Application under Section 4.55(2) of the *Environmental Planning and Assessment Act 1979* (the Act). This application was refused by the consent authority (Tweed Shire Council) in July 2021 as it was determined to not meet the threshold requirements for being considered substantially the same under Section 4.55(2) of the Act. While the development was determined to not meet this threshold requirement, the proposal was generally well received with minimal community objection, no objection from State agencies and reporting from Council that the proposal did meet the objectives of the zone and primary development standards under the Tweed Local Environmental Plan 2014. Site specific matters including stormwater and groundwater management, basement car parking and potential impacts upon an adjacent creek and habitat area were also raised, though given Council determined the proposal could not be considered substantially the same, these matters were not investigated further.

TriCare is now pursuing the proposal through a new Development Application, removing the need to test and determine whether the proposal remains substantially the same, though allowing the proposal to be considered and determined on its merits. This process also allows for the outstanding site-specific concerns to be addressed through further information and clarification. Given the recent changes to the NSW planning framework for seniors housing and rapid assessment, this new Development Application qualifies as a State Significant Development.

It is recognised that Industry-specific SEARs are available for the proposal; however, this Scoping Report has been provided to detail the legislative context for the proposal, and in turn confirm that the proposed development qualifies for Industry-specific SEARs.

A preliminary assessment of key planning and environmental impacts and how they are proposed to be addressed in Environmental Impact Statement (EIS) has also been provided.

2 The Project

2.1 Site Context & Locality

The subject site is located within Hastings Point, a suburb of the Tweed Shire Local Government Area. Situated at 87-89 Tweed Coast Road, Hastings Point, the subject site is comprised of a single 37, 970m² allotment which adjoins Cudgera Creek to the west and council reserves to the north and south. The lot is legally described as Lot 1 on DP 786570.



Figure 1 – The proposed development site at 87-89 Tweed Coast Road, Hasting Point (Source: NearMaps, 2021)

2.2 Project Background

The subject site is owned and operated by market leading seniors housing provider, TriCare. In May 2007, another provider was awarded Development Consent to establish a Seniors Living (84 independent units, 94 supported living units and 67 bed high care facility) development at the subject site. Since this initial approval and TriCare purchasing the site, the Seniors Living development has received a number of modified consent approvals from Tweed Shire Council for minor amendments to the approved form and consent.

In June 2020, TriCare applied to modify the development consent, in accordance with Section 4.55(2) of the Act, to amend the design, siting and staging of the remaining stages ('the proposed development'). This application was refused by Tweed Shire Council on 1st July 2021 as it was determined to have not met the threshold requirements for being 'substantially the same development'.

Subsequently, TriCare are now pursuing a new Development Consent for the development that was the subject of the Modification Application, through the State Significant Development planning pathway.

2.3 Project Overview

Undertaken by the Senior's Living market leading provider TriCare, the proposed development will service the Tweed region with a Senior housing development comprised of 91 independent living units (already constructed), 74 supported living units, and 44 beds within a high care facility / residential aged care facility. Also, the proposed development introduces communal uses that were not previously proposed, such as an indoor pool and bowls green. These measures facilitate an ability for seniors residents to comfortably stay in their homes for longer, which is reflected in contemporary market expectations for individual suites, private space, and facilities of greater proportions.

Stage 1 of the approved development, which incorporated the 91 x independent living units across three buildings with basement car parks, has been constructed and occupied since 2009. A Vegetation Rehabilitation Management Plan has also been implemented and maintained on site in compliance with the original Development Consent.

To be completed over 4 stages and with landscaping dispersed throughout, the proposed Senior Housing Development will provide a redesigned version of the approved development that better reflects the current demand in the Senior's Living market, increases car parking supply onsite and improves moveability within and throughout the site.

A summary of the proposed staging is provided below:

- Stage 1 – Buildings A – C – Independent Living Units (Already Constructed & Operational)
- Stage 2 – Building D - Dual Supported/ Independent Living + Basement Car Park
- Stage 3 – Building E - Dual Supported/ Independent Living + Basement Car Park
- Stage 4 – Building F – Residential Care + Basement Car Park
- Stage 5 – Building G - Dual Supported/ Independent Living + Basement Car Park

Provided as an attachment to this Scoping Report is the Development Plan set which will be submitted as part of the State Significant Development application. Originally produced for the Modification Consent application, the attached plan set provides detailed analysis of the proposed changes.

A snapshot of the proposed changes, with reference to the key development components is provided in Table 1 below.

Table 1: Comparison of the original and proposed key development components

	Approved Development	Proposed Development	Difference
Floor Space Ratio	0.66:1	0.61:1	- 0.05:1
Building Height in storeys	3 storeys	3 storeys	0 storeys
Number of buildings	12 buildings	10 buildings	- 2 buildings
Residential Care	67 beds	44 beds	- 23 beds
Independent Living	91 units	91 Units	0 units
Supported Living	94 units	74 units	- 20 units

	Approved Development	Proposed Development	Difference
No. of Bedrooms across the development	386 bedrooms	365 bedrooms	- 21 beds
Number of Car Spaces	187 spaces	279 spaces	+92 car spaces
Landscape Area	21 754m ²	22 067m ²	+313m ²

3 Legislative Context

This section provides a discussion of the key federal, state, regional and local legislation, and policies relevant to the development of this project. We note that there are other relevant legislative instruments and policies that will require consideration under the EIS, though the list below is provided to confirm the permissibility for the proposal and its qualification as an SSD and for Industry specific SEARs.

3.1 Federal Legislation

3.1.1 Environmental Protection and Biodiversity Conservation Act 1999

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is the central piece of environmental legislation in Australia and provides the legal framework to protect and manage Matters of National Environmental Significance (MNES). Under the EPBC Act, any action (which includes a development) that is considered to have a likely impact on MNES, must be referred to the Minister of Environment.

The proposed development does not have a likely impact on MNES and as such, a referral to the Minister of Environment is not required.

3.2 Key State Legislation

3.2.1 Environmental Planning and Assessment Act 1979 & Associated Regulations

The Act establishes the assessment framework for State Significant Development (SSD). Under Section 4.5(a), the Minister is identified as the consent authority for SSD. Further, Section 4.12 Clause 8, stipulates that SSD is to be accompanied by an Environmental Impact Statement (EIS) in accordance with the requirements of outlined in Division 5 of the *Environmental Planning and Assessment Regulation 2021* (Regulations).

The proposed development is not Designated Development as specified under Schedule 3 of the Regulations.

3.2.2 State Environmental Planning Policy (Planning Systems) 2021

The Planning Systems SEPP identifies development which is declared to be State Significant. Clause 2.6(1) of the SEPP identifies that development is SSD for the purposes of the Act if the development is specified in Schedule 1 or 2 of the SEPP. Clause 28 'Seniors Housing' of Schedule 1 of the SEPP specifies the following development to be SSD.

Development for the purpose of seniors housing if –

- (a) the seniors housing component has a capital investment value of –*
 - (i) for development on land in the Greater Sydney region – more than \$30 million, or*
 - (ii) otherwise – more than \$20 million, and*
- (b) the seniors housing component includes a residential care facility; and*
- (c) other components of the proposed development are not prohibited on the land under an environmental planning instrument.*

An analysis of the proposed development against the Schedule 1 thresholds is provided in Table 2 below.

Table 2 – Analysis of the Proposed Development against the Planning Systems SEPP, Schedule 1 provisions

Schedule 1 – State Significant Development – general	
28 Seniors Housing	
Development for the purpose of seniors housing if -	
(a) the senior's housing component has a capital investment value of -	
<i>(i)</i>	<i>for development on land in the Greater Sydney region – more than \$30 million, or</i>
	The subject site is identified within the Tweed Local Government Area which is located in NSW's North Coast Region.
<i>(ii)</i>	<i>otherwise – more than \$20 million, and</i>
	The proposed development has a minimum Capital Investment Value estimate of \$61 million.
(b) the seniors housing component includes a residential care facility; and	
The proposed development provides a Residential Care Facility, contained within Building F which is located in the centre of the development site on the western boundary (refer attached – DA Plans).	
(c) other components of the proposed development are not prohibited on the land under an environmental planning instrument.	
The proposed development seeks to establish a Seniors Housing on the subject site.	
The Housing SEPP 2021 permits seniors housing on land where seniors housing is permitted with consent under another environmental planning instrument.	
The proposed development is identified within the R1: General Residential zone where, under the Tweed LEP 2014, seniors housing is permitted with consent.	

Given the analysis above, it can be concluded that the proposed development is classified as State Significant Development as it meets the threshold requirement for State Significant Development - Seniors Housing, detailed in *Schedule 1* of the Planning Systems SEPP.

3.2.3 State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 2 of the Resilience and Hazards SEPP identifies the legislative framework for lands identified within the Coastal Wetlands. Clause 2.7 of the SEPP stipulates that “*development for which consent is required by subsection (1), other than development for the purpose of environmental protection works, is declared to be designed development for the purposes of the Act*”.

A western portion of the subject site, where it adjoins Cudgera Creek, is identified on the SEPP's *Coastal Wetlands and Littoral Rainforests Area Map*. The proposed development relates to land outside the area identified within the Coastal Wetland and as such, is not classified as Designated Development. Industry Specific SEARs can be issued in this instance (Figure 2)



Figure 2 – Proposed development with Coastal Wetlands and Littoral Rainforests Area Map overlaid (Source: ePlanning Spatial Viewer, 2021)

3.2.4 State Environmental Planning Policy (Housing) 2021

State Environmental Planning Policy (Housing) 2021 (SEPP Housing) permits the development of Seniors housing on land for which seniors housing is permitted with consent under another environmental planning instrument (Clause 108A(a)).

The proposed development is located in the Tweed Shire Council Local Government Area and is identified within the R1 General Residential zone under the *Tweed Local Environmental Plan 2014*. The Tweed LEP 2014 lists seniors housing as permitted with consent in this zone.

In this regard Seniors housing remains permissible at the subject site, though the proposal will be guided and assessed against the development standards and design requirements of the SEPP.

As informed by the updated SEPP, the new proposal has been modernised by TriCare in relation to meeting changes in seniors lifestyles, attitudes, and choices. This reflects an increased demand to age in place and is supported in the proposal through improved housing diversity, autonomy, privacy, facilities, and support.

3.2.5 Other State Environmental Planning Policies

Other key State Environmental Planning Policy's (SEPP's) which will be considered in the preparation of the EIS include (but not limited to):

- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

- State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021

3.3 Local Planning Regulations

3.3.1 Tweed Local Environment Plan 2014

The *Tweed Local Environment Plan 2014* also applies to the site and provides land use and building design parameters for development in the Tweed Region. The key controls that apply to the site under the TLEP are summarised in **Table 3** below.

Table 3 – Analysis of the key planning controls under the Tweed Local Environmental Plan 2014

LEP Clause	Control	Comments
2.1 – Land Use Zones	R1: General Residential	The development of the subject land for seniors housing is permissible with consent under the R1: General Residential zoning of the subject site.
4.3 – Height of Buildings	Building Height – 8m	It is noted that the building height applied to the subject site has been reduced since the initial development consent was obtained. The proposed development does not exceed the height approved and is consistent with the established buildings on site. The heights proposed are also consistent with the maximum building heights stipulated under the Housing SEPP.
4.4 – Floor Space Ratio	Ratio – 1:1	The proposed development results in a Floor Space Ratio of 0.76:1 and as such is consistent with LEP control and provisions under the Housing SEPP.

3.3.2 Development Control Plans

It is noted that under Clause 2.10 of SEPP (Planning Systems) 2021, the application of Development Control Plans is excluded when assessing SSD projects. Notwithstanding this, the EIS will demonstrate the proposed developments consistency with the surrounding character.

4 Stakeholder Engagement

The proposed development has undergone extensive public and referral agency consultation throughout its lifecycle.

4.1 Community Consultation & Engagement

The development, in its proposed form, was subject to a community consultation and public engagement period as part of the former Modification Application (S4.55(2)), which was refused by Tweed Shire Council on 1st July 2021.

Prior to the lodgement of the Modification Application, TriCare did engage with its residents regarding the built form and layout changes being considered to help inform the proposal.

The proposed development was then publicly exhibited once the application was submitted to Council and in accordance with the Act and the Tweed Shire Council Community Engagement and Participation Plan 2019-2024. It was broadly exhibited from Wednesday 15th July 2020 to Wednesday 29th July 2020. A total of nine (9) submissions were received; seven (7) during the notice period, and two (2) after the notice period.

A summary of the key issues raised in the nine (9) submissions is provided in the table below.

Table 4 – Key Issues raised within the public exhibition period

Key Issue	Detailed Explanation	Applicant Response
Overall Development Outcome/ Design	The submitters expressed concern regarding the suitability of the development outcome and design. These concerns were of varying nature with some questioning the need for the intensity and others concerned with the reduction in intensity.	The redesigned development responds to changes in the aged care industry and market demand. The proposed development provides additional parking and landscape opportunities at the ground level, and an improved level of liveability for residents with dwellings redesigned to maximise coastline, riverfront, and hinterland views.
Waterway Impact	A key concern raised in the exhibition period was the impact construction works were to have on the adjoining waterway.	The existing Development Consent was issued indicating that construction impacts could be appropriately managed, though it requires commissioning additional further studies that confirm the construction methods and practices that will be employed to help manage and minimise potential impacts. It is envisaged that conditions of consent can again be applied for the proposed development to ensure suitable outcomes are achieved at this phase of the project.
Traffic/ Access	Submitters raised safety concerns regarding internal circulation of pedestrians and vehicles within the development. In particular, specific concern was raised regarding the crossing proximate to the Building C basement access.	In response to concerns raised, development plans were amended to reposition the identified crossing to allow for clearer sightlines for pedestrians and vehicles. These modified plans are being submitted for approval under this SSD application.

Stormwater	Concerns were raised regarding stormwater management and its perceived impacts on surrounding development	A Stormwater Management Plan, endorsed by an NER Engineer, will be confirmed within the EIS.
Reduction to Buffer	Submitters raised concern that the proposed development reduces the vegetation buffer to Cudgera Creek.	The proposed development retains the alignment of the core rehabilitation zone and outer buffer approved in the original Development Consent. Greater detail will be provided under the EIS to confirm these outcomes.

4.2 Stakeholder/ Agency Engagement

During the public exhibition period in July 2020, the proposed development was also referred to a number of relevant Government agencies for comment. At that time, no government agencies objected to the proposal, with all providing either 'General Terms of Approval' and/or comments for consideration.

A list of the relevant referral agencies and their response is provided below.

Table 5 – Response from Referral Agencies received during public exhibition

Referral Agency	Response/ Comments
Natural Resources Access Regulator	Issuance of General Terms of Approval
NSW Department of Primary Industries (Fisheries)	Recommended best management practice controls for sediment and erosion be conditioned and confirmed that 20m core buffer and 30m residue buffer are satisfactory.
Rural Fire Service	Issuance of General Terms of Approval
Transport for NSW	Comments for consideration but no objection to the proposed modification.
Water NSW	Issuance of General Terms of Approval

5 Preliminary Environmental Impact Assessment

Based on a preliminary environmental assessment, the following are key environmental assessment and planning issues that will need to be considered within the EIS.

5.1 Consistency with strategic and statutory plans

As detailed in Section 3 above, the proposed development is permissible with consent, and consistent with the key planning controls of the applicable Environmental Planning Instruments.

The EIS will outline the developments consistency with the applicable strategic and statutory planning framework and context of the site.

5.2 Urban Design and Built Form

The overall built form design of the development was approved based on merit under the original development consent.

The proposed development, which seeks to alter the design and siting of the remaining built form has been designed to be sympathetic to the established character whilst simultaneously appealing to the current market demand. Consequently, the proposed development has been reviewed against the provisions of SEPP 65 – Design Quality of Residential Apartments.

As discussed earlier, and as reflected by an increased desire to comfortably age in place, the proposed design addresses a need for larger units and private space, interchangeable and dual use tenancies, access to car parking, and improved facilities and services.

The EIS will demonstrate how the development is consistent with SEPP 65, the established character and the developments successful integration with the landscaped character.

5.3 Ecologically Sustainable Development

The Senior Housing development approved in 2007 was assessed and determined to meet the Ecologically Sustainable Development (ESD) provisions. As such, the proposed development has been designed in accordance with these provisions which will be further demonstrated within the EIS.

5.4 Traffic, Access, and Parking

Access to the development site is contained off Tweed Coast Road which was approved and constructed as part of Stage 1 works. Whilst the proposed development does not seek to alter the main access point it does include revisions to internal road layout to improve manoeuvrability and additional basement car parking.

Specifically, prospective seniors residents and their families desire increased independence, flexibility, and the ability to remain in their homes for longer, with this supported by access to car parking. Accordingly, the proposed outcome ensures that generated parking demand is best managed on-site.

The EIS will address the proposed development's impacts on the traffic network associated with the change in built form, seniors housing composition and its subsequent basement car parking.

5.5 Bushfire Impacts

The subject site is mapped as Bushfire Prone Land and as such, a Bushfire Management Plan (BMP), based on detailed site studies, was prepared by a qualified consultant, and approved as part of the original Development Consent.

Within the Modified Consent application process, this Bushfire Management Plan was reviewed by the consultant to ensure the impacts considered and recommendations provided were relevant, appropriate, and achieved compliance. The BMP was also referred to the New South Wales Rural Fire Service who issued 'General Terms of Approval'.

The EIS will further confirm the effectiveness of the bushfire management practices that have been employed to minimise the risk to built assets, people, ecological assets, and environmental assets.

5.6 Land Contamination

The proposed development is located on lands identified as potentially containing Acid Sulfate Soils. Information obtained from representatives during the initial Development Assessment meetings in 2019, also indicated that radioactive soil assessment was required due to a historical evidence of heavy metal sand extractions on site.

Given the proposed development required extensive earthworks for the construction of basement carparking, an Acid Sulfate Soil Management Plan and Radioactive Sands Assessment was prepared by a qualified consultant and supplied as part of the modified consent application.

The EIS will detail how the proposed development will manage the impact of Acid Sulfate and Radioactive soils and the effectiveness of the recommendations handed down in the consultant report.

5.7 Stormwater and Flooding

The proposed development site is flood liable by virtue of being mapped as being affected by a designated flood level of 2.6m AHD and probable maximum flood level of 5.8m AHD. Located on the banks of the Cudgen Creek along the western boundary, the management of stormwater quality and quantity is also required to ensure the proposed development does not have adverse downstream impacts.

To ensure adequate assessment of the subject site flood risk and stormwater impacts were considered, a suitably qualified Engineer was constructed to provide a Stormwater Management Plan. Provided as part of the original development approval and review and updated for the modified consent application, the Stormwater Management Plan provides considerations and recommendations for the management of flood risk and stormwater on-site.

The EIS will re-evaluate the measures detailed in the Stormwater Management Plan to ensure compliance with current standards and demonstrate that the development does not have significant adverse impacts on flood behaviour.

5.8 Utilities

The subject site is currently improved by Stage 1 which was approved and constructed under the original development consent awarded in 2007. Given Stage 1 is now occupied and operational, the required infrastructure has been established on-site.

The EIS will detail the connection and supply of the proposed development to the existing infrastructure which includes;

- Electricity
- Water
- Sewer

- Communications

5.9 Waste

As detailed in Section 2 of this Scoping Report, the proposed development results in a slight decrease to the scale and intensity of the Seniors Housing development currently approved over the site. Consequently, the comprehensive Waste Management Plan which forms part of the original consent approval will form part of the State Significant Development Application.

The EIS will demonstrate the compliance of the Waste Management Plan with the current guidelines and will detail the effectiveness of the proposed developments waste management practices.

5.10 Construction Impacts

The EIS will address the construction impacts of the development through a preliminary Construction Management Plan, though we note that construction impacts were considered, assessed, and determined to be manageable through conditions of consent which still apply at the site.

6 Conclusion

The purpose of this report is to provide the legislative context for the proposed development and in turn confirm that the Senior Living development at 87-89 Tweed Coast Road, Hastings Point qualifies for Industry-specific SEARs.

This SEARS request outlines the approval pathway, legislative context, and key environmental and planning matters for the consideration in the assessment of the application. The EIS will demonstrate the developments suitability of the site and how key environmental and planning matters will be appropriately mitigated and managed.

We trust that the information detailed in this report is sufficient to enable the Department to issue the Industry Specific SEARs to guide the preparation of the EIS.